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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

**TO:** Secure-bargain.net  
Mark Carlton  
Daniella Sabatini  
Wolf Valentin  
150 High Street North  
London, E62HT, United Kingdom

Secure Bargain Ltd.  
12 Fountain Place  
London, London SW97re, GB

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 17200 and 17403 of the California Financial Code)**

The California Corporations Commissioner finds that:

1. Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure Bargain Ltd. have engaged in the business of an escrow agent by advertising escrow services over the internet at [www.secure-bargain.net](http://www.secure-bargain.net) from in or about 2002 to the present as follows:

- a) Secure-bargain.net represents on its website that the process works as follows: The buyer and seller agree to the terms of a transaction. The buyer then sends payment to Secure-bargain.net, and Secure-bargain.net verifies the funds are good. The seller ships the goods. The buyer accepts the goods, and then Secure-bargain.net pays the seller.
- b) Secure-bargain.net claims on its website that it protects both buyers and sellers from fraud with this process.

1 c) Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure  
2 Bargain Ltd. have represented themselves as intending to “support Internet transactions via an  
3 automated, Web-based escrow service holding a buyer’s money until purchased goods are shipped,  
4 received, and approved, then paying the seller.”

5 d) Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure  
6 Bargain Ltd. have further represented that they provide “the highest quality escrow services to a  
7 broad range of companies and government agencies.”

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9 2. Neither Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, nor Secure  
10 Bargain Ltd. has been issued a license from the Commissioner authorizing them to conduct business  
11 as an escrow agent, as required by California Financial Code section 17200.

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13 3. Neither Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, nor Secure  
14 Bargain Ltd. is exempt from the licensing requirements of Section 17200.

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16 4. Neither Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, nor Secure  
17 Bargain Ltd. has been issued a license from the Commissioner authorizing them to use words  
18 indicating that they are in the escrow business, as required by California Financial Code section  
19 17403.

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21 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that  
22 Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure Bargain Ltd., and  
23 their officers directors, partners, agents, employees and/or servants are in violation of California  
24 Financial Code sections 17200 and 17403(a). Pursuant to California Financial Code section 17416,  
25 Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure Bargain Ltd. are  
26 hereby ordered to desist and refrain from engaging in the business of receiving escrows for deposit or  
27 delivery without first obtaining a license from the Commissioner. Pursuant to California Financial  
28 Code section 17403(b), Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and

1 Secure Bargain Ltd. are further ordered to immediately desist and refrain from issuing, circulating, or  
2 publishing any advertisement by means of any communication, including any website, or making use  
3 of or circulating any letterheads, billheads, blank notes, blank receipts, blank escrow instructions,  
4 certificates, circulars, or any written or printed paper containing any fictitious or corporate name or  
5 other words indicating that they are in the escrow business. This Order is necessary, in the public  
6 interest, for the protection of investors and consistent with the purposes, policies and provisions of  
7 the California Escrow Law. This order shall remain in full force and effect until further order of the  
8 California Corporations Commissioner.

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Dated: May 25, 2004  
Sacramento, California

WILLIAM P. WOOD  
California Corporations Commissioner

By: \_\_\_\_\_  
VIRGINIA JO DUNLAP  
Deputy Commissioner  
Enforcement and Legal Services