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

**TO:** Escrowamericainc.com  
St. Johns Avenue 34  
London SW156-AN  
United Kingdom

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 17200, 17210.2 and 17403 of the California Financial Code)**

The California Corporations Commissioner finds that:

1. Escrowamericainc.com has engaged in the business of an escrow agent by advertising escrow services over the internet at [www.escrowamericainc.com](http://www.escrowamericainc.com) from 2004 to the present as follows:

a) Escrowamericainc.com represents on its website that the process works as follows: The buyer and seller agree to the terms of the transaction. The buyer pays Escrowamericainc.com, which verifies the payment. Escrowamericainc.com notifies the seller to ship its merchandise and then verifies that the buyer receives the shipment. The buyer accepts the goods. Escrowamericainc.com then pays the seller and the transaction is complete.

b) Escrowamericainc.com claims to protect both the buyer and the seller from fraud with this process.

c) Escrowamericainc.com has represented itself to be a licensed escrow agent by advertising that the company holds Department of Corporations escrow agents' license number 963-2109. In fact, the Department of Corporations issued escrow license number 963-2109 to Escrow America, Inc., in Los Angeles, California, on April 1, 2004. Escrowamericainc.com is not a website

1 of Escrow America, Inc.

2 d) Escrowamericainc.com has further represented that the escrow services provided  
3 by Escrowamericainc.com are provided by Internet Escrow Services (IES), and that IES and  
4 Escrowamericainc.com are “fully licensed and accredited as an escrow company and is subject to  
5 compliance with all applicable escrow regulations.” In fact, IES is an affiliate of Escrow.com and  
6 Escrowamericainc.com is not affiliated with either IES or Escrow.com.

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8 2. Escrowamericainc.com has not been issued a license from the Commissioner authorizing it  
9 to conduct business as an escrow agent, as required by California Financial Code section 17200.

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11 3. Escrowamericainc.com is not exempt from the licensing requirements of Section 17200.

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13 4. Escrowamericainc.com has not been issued a license from the Commissioner authorizing it  
14 to use words indicating that it is in the escrow business, as required by California Financial Code  
15 section 17403.

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17 5. Escrowamericainc.com has disseminated or caused to be disseminated false, misleading  
18 and/or deceptive statements or representations which refer to Escrowamericainc.com’s affiliation  
19 with IES, when, in fact, Escrowamericainc.com is not affiliated with IES or Escrow.com.

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21 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that  
22 Escrowamericainc.com and its officers directors, partners, agents, employees and/or servants are in  
23 violation of California Financial Code sections 17200, 17210.2(a) and 17403(a). Pursuant to  
24 California Financial Code section 17416, Escrowamericainc.com is hereby ordered to desist and  
25 refrain from engaging in the business of receiving escrows for deposit or delivery without first  
26 obtaining a license from the Commissioner. Pursuant to California Financial Code section 17403(b),  
27 Escrowamericainc.com is further ordered to immediately desist and refrain from issuing, circulating,  
28 or publishing any advertisement by means of any communication, including any website, or making

1 use of or circulating any letterheads, billheads, blank notes, blank receipts, blank escrow instructions,  
2 certificates, circulars, or any written or printed paper containing any fictitious or corporate name or  
3 other words indicating that it is in the escrow business. Pursuant to California Financial Code section  
4 17210.2(c), Escrowamericainc.com is further ordered to immediately desist and refrain from  
5 disseminating, or causing or permitting to be disseminated, in any manner whatsoever, any statement  
6 or representation which is false, misleading, or deceptive, or which omits to state material  
7 information, or which refers to the supervision of that agent by the State of California or any  
8 department or official thereof. Escrowamericainc.com is further ordered to immediately desist and  
9 refrain from disseminating or causing or permitting to be disseminated, in any manner whatsoever,  
10 any statement or representation that Escrowamericainc.com is in any manner associated with IES.

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12 This Order is necessary, in the public interest, for the protection of investors and consistent with the  
13 purposes, policies and provisions of the California Escrow Law. This order shall remain in full force  
14 and effect until further order of the California Corporations Commissioner.

15 Dated: February 11, 2005  
16 Sacramento, California

17 WILLIAM P. WOOD  
18 California Corporations Commissioner

19  
20 By: \_\_\_\_\_  
21 WAYNE STRUMPFER  
22 Acting Deputy Commissioner  
23 Enforcement Division  
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