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

**TO:** Trinity-escrow.com  
15 Bath Road  
London, TW6 2AB  
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. Trinity-escrow.com has engaged in the business of an escrow agent by advertising escrow services over the Internet at [www.trinity-escrow.com](http://www.trinity-escrow.com), from 1999 to the present as follows:

a) Trinity-escrow.com represents on its website that the process works as follows:

The buyer and seller agree to the terms of the transaction. The buyer submits a payment to Trinity-escrow.com, which verifies the payment. Trinity-escrow.com notifies the seller to ship its merchandise and then verifies that the buyer receives the shipment. The buyer accepts the goods. Trinity-escrow.com then pays the seller and the transaction is complete.

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

c) Trinity-escrow.com has represented itself to be a licensed escrow agent by advertising that the company is Trinity Escrow, Inc., located in Chino, California, and that it holds Department of Corporations escrow agents' license number 963-1836. In fact, the Department of Corporations issued escrow license number 963-1836 to Trinity Escrow, Inc., in Chino, California, on April 12, 1999. However, Trinity-escrow.com is not a website of Trinity Escrow, Inc.

d) Trinity-escrow.com has represented that the "on-line" escrow services provided by

1 Trinity-escrow.com are provided by Internet Escrow Services (IES), and that IES is “fully licensed  
2 and accredited as an escrow company and is subject to compliance with all applicable escrow  
3 regulations.” In fact, IES is an affiliate of Escrow.com, who is licensed by the Department of  
4 Corporations as an escrow agent authorized to conduct personal property escrows over the Internet,  
5 but Trinity-escrow.com is not affiliated with either IES or Escrow.com.

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

8         3. Trinity-escrow.com is not exempt from the licensing requirements of Section 17200.

9         4. Trinity-escrow.com has not been issued a license from the Commissioner authorizing it to  
10 use words indicating that it is in the escrow business, as required by California Financial Code  
11 section 17403.

12         5. Trinity-escrow.com has disseminated or caused to be disseminated false, misleading and/or  
13 deceptive statements or representations that it is licensed and refer to Trinity-escrow.com’s affiliation  
14 with IES, when, in fact, Trinity-escrow.com is not affiliated with IES in any way.

15         Based upon the foregoing findings, the California Corporations Commissioner is of the  
16 opinion that Trinity-escrow.com and its officers, directors, partners, agents, employees and/or  
17 servants are in violation of California Financial Code sections 17200, 17210.2(a) and 17403(a).  
18 Pursuant to California Financial Code section 17416, Trinity-escrow.com is hereby ordered to desist  
19 and refrain from engaging in the business of receiving escrows for deposit or delivery without first  
20 obtaining a license from the Commissioner. Pursuant to California Financial Code section 17403(b),  
21 Trinity-escrow.com is further ordered to immediately desist and refrain from issuing, circulating, or  
22 publishing any advertisement by means of any communication, including any website, or making use  
23 of or circulating any letterheads, billheads, blank notes, blank receipts, blank escrow instructions,  
24 certificates, circulars, or any written or printed paper containing any fictitious or corporate name or  
25 other words indicating that it is in the escrow business. Pursuant to California Financial Code section  
26 17210.2(c), Trinity-escrow.com is further ordered to immediately desist and refrain from  
27 disseminating, or causing or permitting to be disseminated, in any manner whatsoever, any statement  
28 or representation which is false, misleading, or deceptive, or which omits to state material

1 information, or which refers to the supervision of that agent by the State of California or any  
2 department or official thereof. Trinity-escrow.com is further ordered to immediately desist and  
3 refrain from disseminating or causing or permitting to be disseminated, in any manner whatsoever,  
4 any statement or representation that Trinity-escrow.com is in any manner associated with IES.

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

8 Dated: November 1, 2005  
9 Sacramento, California

10 WAYNE STRUMPFER  
11 Acting California Corporations Commissioner

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13 By: \_\_\_\_\_  
14 ALAN S. WEINGER  
15 Acting Deputy Commissioner  
16 Enforcement Division  
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