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

TO: INNOVATIVE ESCROW SERVICES, INC.
2000A S. Grove Avenue, Suite 109B
Ontario, California 91761

TRACEY WOODEN
2000A S. Grove Avenue, Suite 109B
Ontario, California 91761

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

The California Corporations Commissioner finds that:

1. Innovative Escrow Services, Inc. (“Innovative”) is, and was at all relevant times herein, a California corporation, with its principal place of business located at 2000A S. Grove Avenue, Suite 109B, Ontario, California 91761.
2. Tracey Wooden (“Wooden”) is, and was at all times relevant herein, the escrow officer for Innovative.
3. Innovative and Wooden have engaged in business of an escrow agent from at least March 10, 2011 through the present by representing to the public that they handled escrows and by accepting funds, issuing a receipt and preparing escrow instructions in at least one escrow transaction. In handling the one transaction, Innovative and Wooden represented that Innovative is licensed by the California Department of Corporations and holds license number 3153355.
4. Innovative has not been issued a license by the Commissioner authorizing it to engage in business as an escrow agent under the California Escrow Law (“Escrow Law”) (California Financial Code §§ 17000 et seq.).
5. Neither Innovative nor the escrow transactions handled by Innovative were exempt from the licensing requirements of California Financial Code section 17200.
6. Innovative and Wooden, in handling the escrow(s) described above, made use of and circulated letterheads, escrow instructions, receipts and other documents containing words indicating

1 that it was in the escrow business. Pursuant to California Financial Code section 17403, no person
2 subject to the Escrow Law is allowed to use or circulate documents containing words indicating that
3 it is in the escrow business unless duly licensed under the Escrow Law.

4 By reason of the foregoing, Innovative and Wooden have engaged in unlicensed escrow
5 business in violation of California Financial Code Section 17200 and used words indicating that it is
6 in the escrow business in violation of California Financial Code Section 17403.

7 Pursuant to California Financial Code sections 17403 and 17416, Innovative Escrow
8 Services, Inc. and Tracey Wooden are hereby ordered to desist and refrain from engaging in the
9 business of receiving escrows for deposit or delivery without first obtaining a license from the
10 Commissioner, or otherwise being exempt, and from issuing, circulating, or publishing any
11 advertisement by any means of communication, or making use of or circulating any letterheads,
12 billheads, blank notes, blank receipts, blank escrow instructions, certificates, circulars, or any
13 written, printed, partially written or printed paper containing any name or other words indicating that
14 any of them are in the escrow business.

15 Pursuant to California Financial Code section 17210.2(c), Innovative Escrow Services, Inc.
16 and Tracey Wooden are further ordered to immediately desist and refrain from disseminating, or
17 causing or permitting to be disseminated, in any manner whatsoever, any statement or representation
18 which is false, misleading, or deceptive, or which omits to state material information, or which refers
19 to the supervision of that agent by the State of California or any department or official thereof.

20 This Order is necessary, in the public interest, for the protection of consumers and is
21 consistent with the purposes, policies and provisions of the California Escrow Law. This order shall
22 remain in full force and effect until further order of the Commissioner.

23 California Financial Code section 17210.2(c) provides:

- 24 (a) No escrow agent shall disseminate, or cause or permit to be disseminated,
25 in any manner whatsoever, any statement or representation which is false,
26 misleading, or deceptive, or which omits to state material information, or
27 which refers to the supervision of that agent by the State of California or any
28 department or official thereof.
- (b) The commissioner may order any person to desist from any conduct which
the commissioner finds to be a violation of this section.

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California Financial Code section 17403 provides:

(a) No person subject to this division shall issue, circulate, or publish any advertisement by any means of communication, or make use of or circulate any letterheads, billheads, blank notes, blank receipts, blank escrow instructions, certificates, circulars, or any written, printed, partially written or printed paper containing any fictitious or corporate name or other words indicating that the person is in the escrow business unless the person is a licensed escrow agent.

(b) If, in the opinion of the commissioner any person, except has violated this section, the commissioner may order that person to desist and refrain from that violation. If, within 30 days after such an order is served, a request for a hearing is filed in writing and the hearing is not held within 60 days thereafter, the order is rescinded.

California Financial Code section 17416 provides:

Whenever in the opinion of the commissioner any person, except as named in Section 17006, is engaged, either actually or through subterfuge, in the business of receiving escrows for deposit or delivery as defined in this division, without a license from the commissioner, the commissioner may order that person to desist and refrain from engaging in that business. If, within 30 days after such an order is served, a request for a hearing is filed in writing and the hearing is not held within 60 days thereafter, the order is rescinded.

Dated: April 14, 2011
Los Angeles, CA

PRESTON DuFAUCHARD
California Corporations Commissioner

By _____
Alan S. Weinger
Deputy Commissioner