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7 Attorneys for Complainant  
8

9 BEFORE THE DEPARTMENT OF CORPORATIONS  
10 OF THE STATE OF CALIFORNIA  
11

12 In the Matter of the Statement of ) File Nos.: 963-2486  
Issues/Accusation of THE CALIFORNIA )  
13 CORPORATIONS COMMISSIONER, ) ORDER DENYING ONLINESCROW, INC.’S  
14 ) APPLICATION FOR ESCROW AGENT’S  
Complainant, ) LICENSE  
15 )  
16 vs. )  
17 ONLINESCROW, INC. and BARBARA LYNN )  
BROWN aka BOBBI BROWN, )  
18 )  
19 Respondents. )  
20

21 The California Corporations Commissioner (“Commissioner”) finds that:

22 1. On July 6, 2007, Respondent Onlinescrow, Inc., a California corporation, (“Online”)  
23 filed an application for an escrow agent's license with amendments on August 7, 2007 and August  
24 29, 2007 (File Nos. 963-2486 hereinafter "application") with the California Corporations  
25 Commissioner (“Commissioner”) pursuant to the California Escrow Law (Financial Code sections  
26 17000 et. seq.), in particular, Financial Code Section 17209.

27 2. Respondent Barbara Lynn Brown aka Bobbi Brown (“Brown”) was identified in the  
28 application as the president, vice-president, secretary, treasurer, escrow manager, sole shareholder

1 and director of Online and verified the application on behalf of Online. At all times relevant to the  
2 Statement of Issues/Accusation issued in this matter, Brown had been the manager and an escrow  
3 officer of the Pacific Palisades branch of Brentwood Escrow, Inc. (“Brentwood”), an escrow agent  
4 licensed by the Commissioner.

5 3. On October 5, 2007, the Commissioner, by and through his staff, commenced a  
6 special examination of the books and records of Brentwood to review numerous escrow transactions  
7 handled by Brown while employed at Brentwood. The special examination was commenced after  
8 the Department of Corporations (“Department”) received information from Brentwood that Brown  
9 had been involved in numerous suspicious transactions involving trust funds, which Brentwood  
10 believed had created a trust account shortage. The special examination revealed that between March  
11 26, 2006 and August 27, 2007, Brown had made at least forty-seven (47) unauthorized  
12 disbursements of trust funds and/or escrow fees from the Brentwood Pacific Palisades branch trust  
13 account to herself, on behalf of herself or otherwise, totaling \$190,581.79 in violation of Financial  
14 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. Of  
15 the \$190,581.79 embezzled by Brown, \$108,369.60 was escrow fees due Brentwood from specific  
16 escrow transactions and the remaining \$82,212.19 were trust funds due escrow parties or on behalf  
17 of escrow parties. The special examination further revealed that Brown had failed to disclose the  
18 unauthorized disbursements to or on behalf of herself on the closing statements or otherwise falsified  
19 the closing statement in violation of Financial Code section 17414(a)(2) in order to hide the  
20 unauthorized disbursements.<sup>1</sup> The unauthorized disbursements resulted in a trust account shortage  
21 and numerous ongoing debit balances in violation of California Code of Regulations, title 10, section  
22 1738.1. Brown returned at least \$38,259.06 of the amount she embezzled and Brentwood cured the  
23 remaining trust account shortage.

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28 <sup>1</sup> Unless otherwise noted, Brown characterized the unauthorized disbursements as paid escrow fees on the closing statements despite that such fees were not paid to Brentwood.

1           4.       The violations discovered during the special examination of Brentwood are described  
2 as follows:

3           **A.       Escrow No. 6646 – closed 3-29-06**

4           (1)       On or about March 29, 2006, Brown made an unauthorized disbursement of trust  
5 funds to herself in the amount of \$8,000.00 via a wire transfer in violation of Financial Code section  
6 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.

7           (2)       On or about April 5, 2006, Brown made an unauthorized disbursement of trust funds  
8 to herself in the amount of \$1,700.00 via trust check number 69170 in violation of Financial Code  
9 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.

10          (3)       On or about April 18, 2006, Brown made an unauthorized disbursement of trust funds  
11 to herself in the amount of \$2,746.49 via trust check number 69376 in violation of Financial Code  
12 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.

13          (4)       Brown attempted to hide the unauthorized disbursements by describing them as paid  
14 disbursements on the closing statement in violation of Financial Code section 17414(a)(2).

15           **B.       Escrow No. 6900 – closed 2-16-07**

16          (1)       On or about February 16, 2007, Brown made an unauthorized disbursement of trust  
17 funds in the amount of \$1,110.00 to her mother Frances Brown (“F. Brown”), via a wire transfer in  
18 violation of Financial Code section 17414(a)(1) and California Code of Regulations, title 10,  
19 sections 1738 and 1738.2. The trust funds disbursed to F. Brown represented escrow fees due  
20 Brentwood from this escrow.

21          (2)       Brown attempted to hide the unauthorized disbursement by describing it on the  
22 closing statement as having been paid for cleaning services in violation of Financial Code section  
23 17414(a)(2).

24           **C.       Escrow No. 6927 – closed 12-15-06**

25          (1)       On or about August 10, 2007, Brown made an unauthorized disbursement of trust  
26 funds in the amount of \$38,159.06 to be made to her landscaper, My Backyard, Inc. (“landscaper”)  
27 via trust check number 76374 in violation of Financial Code section 17414(a)(1) and California  
28 Code of Regulations, title 10, sections 1738 and 1738.2. The trust funds disbursed to the landscaper

1 represented monies being held in escrow to pay a potential homeowner association special  
2 assessment, which if no special assessment became occurred or was in a lesser amount, the monies  
3 would refunded to the seller.

4 (2) The unauthorized disbursement was made months after the escrow closed. Thus, the  
5 closing statement was correct when issued.

6 **D. Escrow No. 6951 – closed**

7 (1) On or about March 9, 2007, Brown made an unauthorized disbursement of trust funds  
8 to herself in the amount of \$1,900.00 via trust check number 74295 in violation of Financial Code  
9 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.

10 (2) On or about March 9, 2007, Brown made an unauthorized disbursement of trust funds  
11 to a Nancy Buker (“Buker”) in the amount of \$141.94 via trust check number 74294 in violation of  
12 Financial Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and  
13 1738.2.

14 (3) Brown attempted to hide the unauthorized disbursements by describing them as paid  
15 disbursements on the closing statement in violation of Financial Code section 17414(a)(2).

16 **E. Escrow No. 6958 – closed 1-31-07**

17 (1) On or about February 1, 2007, Brown made an unauthorized disbursement of trust  
18 funds in the amount of \$500.00 to Buker via trust check number 73745 in violation of Financial  
19 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
20 The trust funds disbursed to Buker represented escrow fees due Brentwood from this escrow.

21 (2) On or about February 1, 2007, Brown made an unauthorized disbursement of trust  
22 funds in the amount of \$525.00 to a Mark Yapelli (“Yapelli”) via trust check number 73773 in  
23 violation of Financial Code section 17414(a)(1) and California Code of Regulations, title 10,  
24 sections 1738 and 1738.2. The trust funds disbursed to Yapelli represented escrow fees due  
25 Brentwood from this escrow.

26 **F. Escrow No. 6973 – closed 1-19-07**

27 (1) On or about January 17, 2007, Brown made an unauthorized disbursement of trust  
28 funds to her brother, Warren Brown (“W. Brown”), in the amount of \$1,600.00 via trust check

1 number 73573 in violation of Financial Code section 17414(a)(1) and California Code of  
2 Regulations, title 10, sections 1738 and 1738.2. The trust funds disbursed to W. Brown represented  
3 escrow fees due Brentwood from this escrow.

4 (2) On or about January 18, 2007, Brown made an unauthorized disbursement of trust  
5 funds to her brother, Warren Brown, (“W. Brown”) in the amount of \$3,000.00 via trust check  
6 number 73604 in violation of Financial Code section 17414(a)(1) and California Code of  
7 Regulations, title 10, sections 1738 and 1738.2. The trust funds disbursed to W. Brown represented  
8 escrow fees due Brentwood from this escrow.

9 **G. Escrow No. 6979 – closed 2-21-07**

10 (1) On or about February 22, 2007, Brown made an unauthorized disbursement of trust  
11 funds in the amount of \$800.00 to Yapelli via trust check number 74038 in violation of Financial  
12 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
13 The trust funds disbursed to W. Brown represented escrow fees due Brentwood from this escrow.

14 (2) On or about March 9, 2007, Brown made an unauthorized disbursement of trust funds  
15 to herself in the amount of \$1,200.00 via trust check number 74290 in violation of Financial Code  
16 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
17 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

18 **H. Escrow No. 6980 – closed 3-16-07**

19 (1) On or about March 19, 2007, Brown made an unauthorized disbursement of trust  
20 funds to herself in the amount of \$1,656.00 via trust check number 74325 in violation of Financial  
21 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
22 The trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

23 **I. Escrow No. 6991 – closed 3-21-07**

24 (1) On or about March 23, 2007, Brown made an unauthorized disbursement of trust  
25 funds to herself in the amount of \$9,000.00 via trust check number 74402 in violation of Financial  
26 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
27 The trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.  
28

1           **J.       Escrow No. 7006 – closed 4-9-07**

2           (1)       On or about April 4, 2007, Brown made an unauthorized disbursement of trust funds  
3 to herself in the amount of \$673.00 via trust check number 74607 in violation of Financial Code  
4 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
5 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

6           **K.       Escrow No. 7022 – closed 4-03-07**

7           (1)       On or about April 4, 2007, Brown made an unauthorized disbursement of trust funds  
8 in the amount of \$1,050.00 to a Jerel Taylor via trust check number 74603 in violation of Financial  
9 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
10 The trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

11          (2)       On or about April 4, 2007, Brown made an unauthorized disbursement of trust funds  
12 to herself in the amount of \$120.00 via trust check number 74604 in violation of Financial Code  
13 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
14 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

15          **L.       Escrow No. 7027– closed 3-29-07**

16          (1)       On or about May 18, 2007, Brown made an unauthorized disbursement of trust funds  
17 to herself in the amount of \$4,235.00 via trust check number 75211 in violation of Financial Code  
18 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
19 trust funds disbursed to Brown represented a monies being held by escrow for payment to the  
20 California Franchise Tax Board.

21          (2)       Brown failed to disclose this disbursement on the closing statement in violation of  
22 Financial Code section 17414(a)(2).

23          **M.       Escrow No. 7036 – closed 4-18-07**

24          (1)       On or about April 18, 2007, Brown made two unauthorized disbursements of trust  
25 funds to herself in the respective amounts of amount of \$1,600.00 and \$3,700.00 via trust check  
26 numbers 74825 and 74826 in violation of Financial Code section 17414(a)(1) and California Code of  
27 Regulations, title 10, sections 1738 and 1738.2.

28          (2)       Brown did not divert trust funds to herself in this transaction, but instead overdraw

1 the escrow through her unauthorized disbursements. Thus, there was no need for Brown to falsify  
2 the closing statement in this transaction. However, in an attempt to hide the overdraft, Brown  
3 wrongfully transferred trust funds to this escrow from escrow number 7069. See paragraph S below.

4 **N. Escrow No. 7038– closed 6-26-07**

5 (1) On or about July 2, 2007, Brown made an unauthorized disbursement of trust funds to  
6 herself in the amount of \$7,100.00 via trust check number 75727 in violation of Financial Code  
7 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
8 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

9 (2) Brown attempted to hide the unauthorized disbursement by describing it simply as  
10 paid disbursements on the closing statement in violation of Financial Code section 17414(a)(2).

11 **O. Escrow No. 7046– closed 6-21-07**

12 (1) On or about June 21, 2007, Brown made an unauthorized disbursement of trust funds  
13 in the amount of \$250.00 to Buker via trust check number 75598 in violation of Financial Code  
14 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
15 trust funds disbursed to Buker represented escrow fees due Brentwood from this escrow.

16 (2) On or about June 21, 2007, Brown made an unauthorized disbursement of trust funds  
17 in the amount of \$175.28 to pay her Wells Fargo Visa bill via trust check number 75602 in violation  
18 of Financial Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738  
19 and 1738.2. The trust funds disbursed for Brown represented escrow fees due Brentwood from this  
20 escrow.

21 (3) On or about June 21, 2007, Brown made an unauthorized disbursement of trust funds  
22 in the amount of \$300.91 to pay an unknown Bank of America Visa bill via trust check number  
23 75603 in violation of Financial Code section 17414(a)(1) and California Code of Regulations, title  
24 10, sections 1738 and 1738.2. The trust funds disbursed to Bank of America represented escrow  
25 fees due Brentwood from this escrow.

26 (4) On or about June 21, 2007, Brown made an unauthorized disbursement of trust funds  
27 in the amount of \$638.81 to pay an unknown American Express Card bill via trust check number  
28 75604 in violation of Financial Code section 17414(a)(1) and California Code of Regulations, title

1 10, sections 1738 and 1738.2. The trust funds disbursed to American Express represented escrow  
2 fees due Brentwood from this escrow.

3 **P. Escrow No. 7048– closed 5-02-07**

4 (1) On or about May 3, 2007, Brown made an unauthorized disbursement of trust funds  
5 to herself in the amount of \$3,000.00 via trust check number 75014 in violation of Financial Code  
6 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
7 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

8 (2) Brown attempted to hide the unauthorized disbursement by describing it simply as a  
9 disbursement paid to Wells Fargo Bank on the closing statement with a corresponding escrow fee  
10 discount to offset the disbursement in violation of Financial Code section 17414(a)(2).

11 **Q. Escrow No. 7056 – closed 5-11-07**

12 (1) On or about May 18, 2007, Brown made an unauthorized disbursement of trust funds  
13 to herself in the amount of \$7,420.00 via trust check number 75222 in violation of Financial Code  
14 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
15 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

16 (2) Brown attempted to hide the unauthorized disbursement by describing it simply as a  
17 paid disbursement on the closing statement with a corresponding escrow fee discount to offset the  
18 disbursement in violation of Financial Code section 17414(a)(2).

19 **R. Escrow No. 7068 – closed 5-03-07**

20 (1) On or about May 3, 2007, Brown made an unauthorized disbursement of trust funds  
21 to herself in the amount of \$100.00 via trust check number 74985 in violation of Financial Code  
22 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
23 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

24 (2) Brown attempted to hide the unauthorized disbursement by describing it simply as  
25 paid disbursement on the closing statement in violation of Financial Code section 17414(a)(2).

26 **S. Escrow No. 7069 – closed 6-11-07**

27 (1) On or about June 6, 2007, Brown made an unauthorized disbursement of trust funds  
28 to Brentwood Escrow number 7036 in the amount of \$5,060.30 via trust check number 75398 in

1 violation of Financial Code section 17414(a)(1) and California Code of Regulations, title 10,  
2 sections 1738 and 1738.2. The trust funds disbursed to escrow number 7036 represented escrow  
3 fees due Brentwood from this escrow and were transferred to escrow number 7036 to cover the  
4 shortage created by Brown when she wrongfully disbursed trust funds to herself from that escrow.

5 **T. Escrow No. 7076 – closed 6-14-07**

6 (1) On or about June 14, 2007, Brown made an unauthorized disbursement of trust funds  
7 in the amount of \$1,500.00 to a Carlos Avila via trust check number 75521 in violation of Financial  
8 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
9 The trust funds disbursed to Avila represented escrow fees due Brentwood from this escrow.

10 (2) On or about June 14, 2007, Brown made an unauthorized disbursement of trust funds  
11 to herself in the amount of \$4,000.00 via trust check number 75524 in violation of Financial Code  
12 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
13 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

14 **U. Escrow No. 7089 – closed 6-19-07**

15 (1) On or about June 18, 2007, Brown made an unauthorized disbursement of trust funds  
16 to herself in the amount of \$2,500.00 via trust check number 75553 in violation of Financial Code  
17 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
18 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

19 (2) Brown attempted to hide the unauthorized disbursements by describing it as a  
20 disbursement to Wells Fargo Bank on the closing statement in violation of Financial Code section  
21 17414(a)(2).

22 **V. Escrow No. 7090 – closed 6-15-07**

23 (1) On or about June 21, 2007, Brown made an unauthorized disbursement of trust funds  
24 in the amount of \$3,600.00 to her landscaper via trust check number 75599 in violation of Financial  
25 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
26 The trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

27 (2) On or about June 15, 2007 and June 26, 2007, Brown made two unauthorized  
28 disbursements of trust funds to Buker in the respective amounts of \$400.00 and \$20.00 via trust

1 check numbers 75538 and 75634 in violation of Financial Code section 17414(a)(1) and California  
2 Code of Regulations, title 10, sections 1738 and 1738.2. The trust funds disbursed to Buker  
3 represented escrow fees due Brentwood from this escrow.

4 **W. Escrow No. 7092 – closed 7-24-07**

5 (1) On or about July 31, 2007, Brown made an unauthorized disbursement of trust funds  
6 in the amount of \$5,075.00 to Brentwood Escrow number 7106 via trust check number 76237 in  
7 violation of Financial Code section 17414(a)(1) and California Code of Regulations, title 10,  
8 sections 1738 and 1738.2. The trust funds disbursed to escrow number 7106 represented escrow  
9 fees due Brentwood from this escrow and were transferred to escrow number 7106 to help cover the  
10 shortage created by Brown in that escrow when she wrongfully disbursed trust funds to herself and  
11 others from that escrow.

12 **X. Escrow No. 7095 – closed 6-27-07**

13 (1) On or about June 27, 2007, Brown made an unauthorized disbursement of trust funds  
14 in the amount of \$3,800.00 to her landscaper via trust check number 75655 in violation of Financial  
15 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
16 The trust funds disbursed to the landscaper represented escrow fees due Brentwood from this  
17 escrow.

18 (2) On or about June 27, 2007, Brown made an unauthorized disbursement of trust funds  
19 to herself in the amount of \$2,000.00 via trust check number 75660 in violation of Financial Code  
20 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
21 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

22 (3) Brown attempted to hide the unauthorized disbursements on the closing statement by  
23 describing the disbursement to her landscaper as work done on the property for the escrow parties  
24 and the disbursement to herself as funds paid to Washington Mutual per lender’s instructions in  
25 violation of Financial Code section 17414(a)(2).

26 **Y. Escrow No. 7106 – closed 7-20-07**

27 (1) On or about July 23, 2007, Brown made an unauthorized disbursement of trust funds  
28 to herself in the amount of \$18,500.00 via trust check number 76046 in violation of Financial Code

1 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.

2 (2) On or about July 25, 2007, Brown made an unauthorized disbursement of trust funds  
3 to herself in the amount of \$5,650.00 via trust check number 76128 in violation of Financial Code  
4 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
5 trust check was written for a wire to Brown’s Washington Mutual bank account, but was returned by  
6 the bank.

7 (3) On or about July 26, 2007 and August 27, 2007, Brown made two unauthorized  
8 disbursements of trust funds in the respective amounts of \$5,650.00 and \$5,650.00 to her landscaper  
9 via trust check numbers 76172 and 76436 in violation of Financial Code section 17414(a)(1) and  
10 California Code of Regulations, title 10, sections 1738 and 1738.2.

11 (4) Brown attempted to hide the unauthorized disbursements by describing them as loans  
12 on the closing statement in violation of Financial Code section 17414(a)(2).

13 **Z. Escrow No. 7108 – closed 7-26-07**

14 (1) On or about July 13, 2007 and July 26, 2007, Brown made two unauthorized  
15 disbursements of trust funds in the respective amounts of \$10,000.00 and \$4,225.00 to her  
16 landscaper via trust check numbers 75884 and 76180 in violation of Financial Code section  
17 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The trust funds  
18 disbursed to the landscaper represented escrow fees due Brentwood from this escrow.

19 **AA. Escrow No. 7121 – closed 7-03-07**

20 (1) On or about July 2, 2007, Brown made an unauthorized disbursement of trust funds to  
21 herself in the amount of \$550.00 via trust check number 75736 in violation of Financial Code  
22 section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2. The  
23 trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

24 (2) On or about July 3, 2007, Brown made an unauthorized disbursements of trust funds  
25 in the amount of \$10,000.00 to her landscaper via trust check number 75746 in violation of Financial  
26 Code section 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.  
27 The trust funds disbursed to Brown represented escrow fees due Brentwood from this escrow.

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1           5. Pursuant to Financial Code section 17209.3, the Commissioner may deny a license  
2 application(s) if “any incorporator, officer, or director of the applicant has, within the last 10 years,  
3 . . . (2) committed any act involving dishonesty, fraud, or deceit, which crime or act is substantially  
4 related to the qualifications, functions, or duties of a person engaged in business in accordance with  
5 the provisions of this division” and/or “the applicant, any officer, director, general partner, or  
6 incorporator of the applicant, or any person owning or controlling, directly or indirectly, 10 percent  
7 or more of the outstanding equity securities of the applicant has violated any provision of this  
8 division or the rules thereunder . . . .”

9           6. The above-described violations involve acts of dishonesty and deceit and are  
10 substantially related to the qualifications, functions, or duties of a person engaged in business in  
11 accordance with the Escrow Law and constitute grounds under Financial Code section 17209.3 to  
12 deny license application(s) under the Escrow Law.

13           7. On November 25, 2008, the Commissioner issued a Notice of Intention to Issue Order  
14 Denying Application For Escrow Agent’s License and to Issue Order Pursuant to California  
15 Financial Code Section 17423 (Bar From Employment, Management or Control of Any Escrow  
16 Agent), Statement of Issues/Accusation and accompanying documents against Online and Brown  
17 based upon the above, and Online was personally served with those documents on December 2,  
18 2008. The Department has received no request for a hearing or any other response from Online and  
19 the time to request a hearing has expired.

20           NOW GOOD CAUSE APPEARING THEREFORE, it is hereby ordered that the application  
21 for an escrow agent's license filed by Onlinescrow, Inc. on July 6, 2007 is denied.

22 Dated: December 18, 2008  
23 Los Angeles, CA

PRESTON DuFAUCHARD  
California Corporations Commissioner

24 By \_\_\_\_\_  
25 Alan S. Weinger  
26 Lead Corporations Counsel