

1 MARY ANN SMITH
Deputy Commissioner
2 SEAN ROONEY
Assistant Chief Counsel
3 MARLOU de LUNA (State Bar No. 162259)
4 Senior Counsel
5 Department of Financial Protection and Innovation
6 320 W. 4th Street, Suite 750
7 Los Angeles, CA 90013-2344
8 (213) 503-3360
9 Attorneys for Complainant

10 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION
11 OF THE STATE OF CALIFORNIA

12 In the Matter of:) ESCROW LICENSE NO.: 9631157
13)
14 THE COMMISSIONER OF FINANCIAL)
PROTECTION AND INNOVATION,)
15)
16 Complainant,) NOTICE AND SUMMARY OF FINDINGS
17 v.) PURSUANT TO FINANCIAL CODE
18) SECTION 17621
19)
20 ESCROW TECHNOLOGIES, INC.)
21)
22)
23 Respondent.)

23 TO: ESCROW TECHNOLOGIES, INC.
9440 Reseda Boulevard #203
24 Northridge, CA 91324
25 CITY NATIONAL BANK
525 S. Flower St.
26 Los Angeles, CA 90071
27
28

1 PLEASE TAKE NOTICE that the Commissioner of Financial Protection and Innovation
2 (Commissioner) finds that:

3 1. Escrow Technologies, Inc. (Escrow Technologies) is licensed as an escrow agent
4 under the California Escrow Law (Escrow Law) (Fin. Code, § 17000 et seq.). Escrow Technologies
5 maintains three licensed locations in California: (1) its main office in Northridge, license no.
6 9631157; (2) a branch office in Studio City, license no. 96DBO-85468; and (3) a branch office in
7 Newport Beach, license no. 8631632.

8 2. Robert Hance (Hance) is the president of Escrow Technologies.

9 3. On November 20, 2025, the Department of Financial Protection and Innovation
10 (Department or DFPI) commenced a special examination of Escrow Technologies following the
11 company’s report that its trust account at City National Bank had been hacked. The circumstances
12 reported to the Department include the following:

13 a. On the morning of November 17, 2025, administrative manager Paula Gomez
14 (Gomez) received a call from an individual identifying himself as a member of City National Bank’s
15 fraud department (Caller #1). The caller ID displayed a phone number matching City National
16 Bank’s, which Gomez recognized based on her regular handling of the company’s banking.

17 b. Caller #1 advised Gomez of two suspicious wire transactions in the amounts of
18 \$68,000.00, and 298,000.00 that appeared to have been initiated from Texas. Gomez checked
19 Escrow Technologies’ internal system and confirmed that no such wires had been initiated by the
20 company. Caller #1 then transferred Gomez to the fraud-department representative (Caller #2).

21 c. Caller #2 informed Gomez that multiple fraudulent wire transactions were allegedly
22 being generated and requested her assistance in in cancelling them. Caller #2 stated that additional
23 verification was required and directed that a second Escrow Technologies employee participate.
24 Gomez therefore involved Terri Eden (Eden), manager of the Newport Beach branch. Caller #2 then
25 contacted Eden directly and provided instructions purportedly necessary to “cancel” the wires, while
26 stating that additional wires continued to be generated.
27
28

1 d. During these events, the Studio City branch manager received notices of new outgoing
2 wires and forwarded them to Gomez and Hance. Gomez advised that she was on the phone with the
3 bank at the time and believed she was taking appropriate action.

4 e. On November 18, 2025, Escrow Technologies confirmed with City National Bank that
5 no legitimate fraud-prevention outreach had occurred. The company determined that a total of
6 \$4,281,686.00 had been fraudulently transferred out of its trust account. The bank initiated recall
7 requests for 40 wires at 11 financial institutions. Of these, 35 had been processed, resulting in an
8 estimated shortage of \$3,804,686.00. Five wires were rejected due to clerical errors.

9 f. A list of the fraudulent outbound wire transfers is as follows:

Transaction Date	Transaction Number	Receiving Bank	Beneficiary Name	Amount
11/17/2025	20251117-0012115	PNC Bank	Mike Bowen	\$105,000.00
11/17/2025	20251117-0012469	Navy Federal C.U.	Kajhad Washington	\$78,000.00
11/17/2025	20251117-0012468	Navy Federal C.U.	Jasmane Williams	\$88,000.00
11/17/2025	20251117-0012859	Regions Bank	Bobg Collection	\$50,670.00
11/17/2025	20251117-0012860	Wells Fargo Bank	Rasheem Berry	\$55,547.00
11/17/2025	20251117-0012876	Chase Manhattan Bank	Alexis Myles	\$68,970.00
11/17/2025	20251117-0012874	Chase Manhattan Bank	The Best Cuts 100LLC	\$95,000.00
11/17/2025	20251117-0013572	Bank of America	Exotic Celebrity	\$205,000.00
11/17/2025	20251117-0014146	Chase Manhattan Bank	Noah Canup	\$58,000.00
11/17/2025	20251117-0014147	Chase Manhattan Bank	Felicia Seay	\$105,000.00
11/17/2025	20251117-0014194	PNC Bank	Labrieshia Thomas LLC	\$135,000.00
11/17/2025	20251117-0014468	TD Bank	Adiel Thompson	\$85,000.00

1	11/17/2025	20251117-0014467	Navy Federal C.U.	Janae Hall	\$89,000.00
2	11/17/2025	20251117-0014976	Space Coast C.U.	Emmanuel Robinson	\$67,000.00
3	11/17/2025	20251117-0014975	Bank of America	Wedsky Saint	\$75,000.00
4	11/17/2025	20251117-0015466	Chase Manhattan Bank	Michael Field	\$74,999.00
5	11/17/2025	20251117-0015465	Comerica Bank	Leo Capital BW Delaware LLC	\$222,000.00
6	11/17/2025	20251117-0015497	Chase Manhattan Bank	Mandie Bryant	\$85,000.00
7	11/17/2025	20251117-0017189	PNC Bank	Jasmane Williams	\$89,000.00
8	11/17/2025	20251117-0017188	Bank of America	Limited Edition Communication LLC	\$105,000.00
9	11/17/2025	20251117-0018109	Discover, Capital One	Eddie Griffin	\$101,000.00
10	11/17/2025	20251117-0018110	Bank of America	Done Right Window Tint Inc	\$107,000.00
11	11/17/2025	20251117-0018153	Citibank	Hisshara Dandridge	\$103,000.00
12	11/17/2025	20251117-0018944	Bank of America	Medaly Simon	\$88,000.00
13	11/17/2025	20251117-0018945	Navy Federal C.U.	Chaddrick Daniels	\$96,000.00
14	11/17/2025	20251117-0018978	PNC Bank	Whytwokayy LLC	\$64,000.00
15	11/17/2025	20251117-0018976	TD Bank	Ashley Pierre	\$87,900.00
16	11/17/2025	20251117-0020384	Wells Fargo Bank	Greenline Property Service	\$102,000.00
17	11/17/2025	20251117-0020383	Bank of America	Brorough of Shenandoah	\$103,000.00
18	11/17/2025	20251117-0020390	Bank of America	Set The Mood Recording LLC	\$103,900.00
19	11/17/2025	20251117-0020389	Citibank	Jamill Jackson	\$130,000.00
20	11/17/2025	20251117-0020406	Wells Fargo Bank	Kayla Reddick	\$67,000.00
21	11/17/2025	20251117-0020999	Bank of America	Express Jewelry LLC	\$526,700.00
22					
23					
24					
25					
26					
27					
28					

11/17/2025	20251117-0021006	Navy Federal C.U.	Ashante Deris	\$89,000.00
11/17/2025	20251117-0021005	Navy Federal C.U.	Guanesha Collier	\$100,000.00
			TOTAL	\$3,804,686.00

g. As a result of the unauthorized wire transfers described above, Escrow Technologies’ trust account at the Studio City branch reflected a shortage of \$3,804,686.00 as of November 20, 2025, in violation of Escrow Law (Fin. Code, § 17000 et seq.), including Financial Code section 17414, subdivision (a)(1).

4. On November 25, 2025, the DFPI directed Escrow Technologies, by email to Hance, to replenish the trust account shortage no later than November 26.

5. On November 26, 2025, DFPI staff spoke with Hance, who stated that Escrow Technologies was unable to replenish the shortage. Hance indicated he would provide a written plan describing potential avenues for addressing the shortage but did not provide any confirmed source of funds or a concrete replenishment timeline.

6. On December 1, 2025, Hance submitted a formal letter responding to the DFPI’s November 25 directive. The response did not commit to replenishing the shortage or identify any verifiable funding source. Escrow Technologies requested a short DFPI-supervised continuation of operations, citing pending escrow closings, recovery efforts, and potential acquisition discussions. To date, only \$500,000.00 in frozen funds has been independently verified.

7. On December 2, 2025, DFPI counsel emailed Hance confirming that the DFPI was granting a brief extension through Friday, December 5, solely for the purpose of verifying frozen-funds data required under a court order. The email also reiterated that Escrow Technologies must replenish the trust account shortage by close of business on December 5, 2025, and advised that failure to do so would result in further Department action. Hance confirmed receipt.

8. As of December 5, 2025, Escrow Technologies has failed to cure the trust account shortage. The company has not replaced the missing funds or provided verified recovery sufficient to eliminate the deficiency, thereby triggering the DFPI’s authority to take further action.

1 9. Based on the foregoing, the Commissioner finds that Escrow Technologies is
2 conducting escrow business in an unsafe or injurious manner such that further operations are
3 hazardous to the public or its customers.

4 10. Financial Code section 17621 provides in relevant part:
5 Whenever it appears to the Commissioner that any escrow agent subject to this
6 division:

- 7 (a) Is in an insolvent condition;
- 8 (b) Is conducting escrow business in an unsafe and unauthorized manner;
- 9 (c) Has violated its charter or any law of the State of California . . .
- 10 . . .
- 11 (h) Has permitted its tangible net worth to be lower than the minimum
12 required by law;
- 13 . . .

14 the commissioner shall dispatch a written notice and summary of findings, as
15 referred to in Section 17415, to the principal officer of the escrow agent
16 involved or to its manager of record; and such escrow agent shall be afforded a
17 reasonable opportunity to comply or otherwise effect such remedies as the
18 commissioner may deem acceptable. However, should the escrow agent so
19 notified fail to comply within five days of receipt of the notice, or as soon as it
20 appears to the commissioner that no compliance is possible, or in the event
21 prompt delivery of the prescribed written notice is impossible, the
22 commissioner may forthwith take possession of the property and business of
23 such escrow agent and retain possession until such escrow agent resumes
24 business or its affairs be finally liquidated as provided in this chapter. The
25 escrow agent, with the consent of the commissioner, may resume business
26 upon such conditions as the commissioner may prescribe.

21 11. Pursuant to Financial Code sections 17621 and 17630, it is necessary to appoint a
22 conservator, as set forth in the accompanying Order Appointing Blake C. Alsbrook as Conservator
23 Pursuant to Financial Code Section 17630.

24 Dated: December 5, 2025
25 Los Angeles, California

KHALIL MOHSENI
Commissioner of Financial Protection and Innovation

26 By _____
27 MARLOU de LUNA
28 Senior Counsel
Enforcement Division