

1 **STATE OF CALIFORNIA**
2 **BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY**
3 **DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION**

4 TO: JAMES DELGADO
5 1201 Puerta Del Sol., C6
6 San Clemente, California 92673

7 **DESIST AND REFRAIN ORDER**
8 **(For violations of section 17403 of the California Financial Code)**

9 The Commissioner of Financial Protection and Innovation finds that:

10 1. James Delgado (Delgado) is, and was at all times relevant herein, the only known
11 principal or employee of a business entity of an unknown type with its principal place of business at
12 1201 Puerta Del Sol, #C6, San Clemente, California, 92673; which business is, and was at all times
13 relevant herein, posing as a California licensed escrow company.

14 2. During December of 2024, Delgado provided at least one California consumer with a
15 PDF document entitled "Buyer Opening Package" consisting of "Additional Escrow Instructions and
16 General Provisions." This document referenced an "escrow number" and listed Delgado as an
17 "escrow officer."

18 3. During December of 2024, Delgado provided at least one California consumer with a
19 "Wire Transfer Instructions" document. The document listed a licensed California escrow company
20 as the "beneficiary [sic]" of a "Wel Bank, NA" account and referenced the same "escrow number"
21 Identified in the "Buyer Opening Package."

22 4. The above-mentioned documents were sent to at least one California consumer from
23 the email address heritageescrow.co@gmail.com.

24 5. These documents and communications by Delgado indicated that he was in the escrow
25 business.

26 6. Neither Delgado nor any business located at 1201 Puerta Del Sol, #C6, San Clemente,
27 California, 92673, is licensed or authorized by the Commissioner to engage in business as an escrow
28 agent.

1 7. Under California Financial Code section 17403(a), no person subject to the Escrow
2 Law (Fin. Code §§ 17000 -_17703) is allowed to use or circulate documents containing words
3 indicating that it is in the escrow business unless duly licensed under the Escrow Law.

4 By reason of the foregoing, the Commissioner of Financial Protection and Innovation finds
5 that Delgado, through the above-described conduct, indicated that he was engaged in the business of
6 an escrow agent without first obtaining an escrow agent’s license from the Commissioner of
7 Financial Protection and Innovation, in violation of Financial Code section 17403.

8 Pursuant to Financial Code section 17403(b), Delgado is hereby ordered to desist and refrain
9 from issuing, circulating, or publishing any advertisement by means of any communication, including
10 any Internet websites; or making use of or circulating any letterhead, billhead, blank notes, blank
11 receipts, blank escrow instructions, certificates, circulars, or any written or printed paper containing
12 any fictitious or corporate name or other words, indicating that he is in the escrow business.

13 This Order is necessary, in the public interest, for the protection of consumers and consistent
14 with the purposes, policies, and provisions of the Escrow Law (Fin. Code, §§ 17000 - 17703).

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16 DATED: March 27, 2025
17 Sacramento, California

KHALIL MOHSENI
Commissioner of Financial Protection and Innovation



18
19 By: _____
20 MARY ANN SMITH
21 Deputy Commissioner
22 Enforcement Division
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