

1 MARY ANN SMITH  
Deputy Commissioner  
2 BORYANA ARSOVA  
Assistant Chief Counsel  
3 SONIA SINGH (State Bar No. 311080)  
4 Senior Counsel  
5 Department of Financial Protection and Innovation  
320 W. 4th Street, Suite 750  
6 Los Angeles, CA 90013-2344  
(310) 759-3912  
7

8 Attorneys for Complainant  
9

10 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION  
11 OF THE STATE OF CALIFORNIA  
12

13	In the Matter of:	)	ESCROW LICENSE NO: 96DBO-187619
14	THE COMMISSIONER OF FINANCIAL	)	
15	PROTECTION AND INNOVATION,	)	
16		)	NOTICE AND SUMMARY OF FINDINGS
17	Complainant,	)	PURSUANT TO FINANCIAL CODE
18	v.	)	SECTION 17621
19	AXIOM ESCROW INC.,	)	
20		)	
21	Respondent.	)	

22  
23 TO: AXIOM ESCROW, INC.  
3914 Murphy Canyon Road Suite A144  
24 San Diego, California 92123  
25 Attn: Gassan Jaleel

26 COMERICA BANK  
2307 Fenton Pkwy, Suite C109  
27 San Diego, CA 92108  
28

1 RMA ACCOUNTING SERVICES, INC.  
2 1509 W Cameron Ave  
3 West Covina, CA 91790

4 EXCEPTIONAL FINANCIAL INC. DBA EXCEPTIONAL MORTGAGE  
5 303 E. Main Street  
6 El Cajon, California 92020

7 ADAM'S INCOME TAX & ACCOUNTING SERVICES LLC  
8 311 E. Main Street  
9 El Cajon, California 92020

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

- 11 1. Axiom Escrow, Inc. (Axiom) is licensed as an escrow agent under the California  
12 Escrow Law (Fin. Code, § 17000 et seq.), with license number 96DBO-187619.
- 13 2. Axiom’s president and sole owner is Gassan K. Jaleel (Jaleel). Currently, Axiom’s  
14 sole employee is Jayne Mantel (Jayne), an escrow manager.
- 15 3. The Department of Financial Protection and Innovation (DFPI) received a  
16 whistleblower complaint regarding Axiom’s misappropriation and embezzlement of trust account  
17 funds.
- 18 4. The DFPI commenced a regulatory examination of Axiom on January 6, 2026. As  
19 part of that examination, the DFPI requested a copy of Axiom’s escrow books and records. The  
20 DFPI received Axiom’s bank reconciliation for its trust account as of December 31, 2025, but the  
21 reconciliation had certain items that required adjustments. Thereafter, the DFPI followed up  
22 numerous times with Axiom for the missing information.
- 23 5. On March 13, 2026, the DFPI sent a formal demand letter to Axiom for supporting  
24 documents and escrow files to clear the reconciling items, but Axiom only provided some of the  
25 documents requested.
- 26 6. On April 27, 2026, the DFPI examiner conducting the examination (Examiner) arrived  
27 on site at Axiom’s office to review its books and records. Based on the Examiner’s findings, Axiom  
28 transferred money between several different accounts without authorization. The following are a few

1 examples of Axiom’s unauthorized disbursements:

- 2 a. On March 28, 2026, Jayne made disbursements of trust funds from Escrow No.  
3 26-1089 to Escrow No. 24-1039 in the amount of \$100,000.00 via trust check  
4 numbers 3240 and 3241. On the same day, Jayne disbursed \$100,000.00 from  
5 Escrow No. 24-1039 as “Buyer Refunds.” Thereafter, on April 3, 2026, trust  
6 check numbers 3240 and 3241 were cancelled, causing a trust account shortage  
7 of \$100,000.00 in Escrow No. 24-1039. These escrow files do not share a  
8 common principal or property, and despite the Examiner’s requests, Axiom has  
9 failed to provide any instructions authorizing the \$100,000.00 transfer between  
10 the escrow files. By issuing the payments between the unrelated escrow files  
11 without written authorization, Axiom knowingly or recklessly disbursed trust  
12 funds not in accordance with escrow instructions which caused a trust  
13 shortage, in violation of Financial Code section 17414, subdivision (a)(1) and  
14 10 CCR sections 1738 and 1738.1.
- 15 b. On December 30, 2025, Jayne made a disbursement of trust funds from  
16 Escrow No. 24-1027 to Escrow No. 25-1145 for \$20,000.00 via trust check  
17 number 3050. These escrow files do not share a common principal or  
18 property. When the Examiner requested instructions authorizing the  
19 \$20,000.00 transfer between the escrow files, Jayne tried to ask the principals  
20 of Escrow No. 24-1027 to sign instructions after the fact on May 1, 2026. The  
21 seller signed the instructions, but the borrower did not. By issuing the  
22 payments between the unrelated escrow files without written authorization,  
23 Axiom knowingly or recklessly disbursed trust funds not in accordance with  
24 escrow instructions, in violation of Financial Code section 17414, subdivision  
25 (a)(1) and 10 CCR section 1738.
- 26 c. Jayne made numerous disbursements of trust funds from Escrow No. 25-1145  
27 to the following escrow files: (1) \$50,000.00 to Escrow No. 25-1121 on  
28 December 22, 2025 via wire number 1953; (2) \$242,000.00 to Escrow No. 25-

1 1146 on August 11, 2025 via wire number 1812; (3) \$150,000.00 to Escrow  
2 No. 25-1158 on August 12, 2025 via wire number 1816; (4) \$150,000.00 to  
3 Escrow No. 25-1144 on August 20, 2025 via wire number 1824; (5)  
4 \$500,000.00 to Escrow No. 25-1158 on August 27, 2025 via wire number  
5 1834; (6) \$850,000.00 to Escrow No. 25-1150 on August 28, 2025 via wire  
6 number 1836; (7) \$136,500.00 to Escrow No. 25-1076 on September 11, 2025  
7 via wire number 1854; (8) \$116,017.27 to Escrow No. 24-1050 on November  
8 4, 2025 via wire number 1906; and (9) \$50,387.50 to Escrow No. 24-1057 on  
9 November 4, 2025 via wire number 1905. Despite the Examiner's requests,  
10 Axiom has failed to provide any instructions authorizing any of these transfers  
11 between the escrow files. By issuing the payments between the unrelated  
12 escrow files without written authorization, Axiom knowingly or recklessly  
13 disbursed trust funds not in accordance with escrow instructions, in violation  
14 of Financial Code section 17414, subdivision (a)(1) and 10 CCR section 1738.

- 15 d. On or about April 30, 2026, Jayne admitted to the Examiner that prior to  
16 receiving certain loan proceeds in Escrow No. 26-1089, she had made  
17 disbursements from the escrow file prematurely. When the loan was cancelled,  
18 Jayne's premature disbursements caused an escrow trust account shortage of  
19 \$186,050.00 in Escrow No. 26-1089, in violation of 10 CCR section 1738.1.

20 7. On April 28, 2026, DFPI sent a demand letter by email requiring Axiom to replenish  
21 the trust account, either in the amount of \$299,154.72 (the estimated trust account shortage at the  
22 time) or any updated amount per further findings in the interim. The deadline to comply or respond  
23 was April 30, 2026. To date, Jayne has been the primary individual communicating with the DFPI  
24 regarding Axiom's attempts to address the trust accountant shortage.

25 8. To date, Axiom's attempts to replenish the trust account shortage have been improper,  
26 as follows:

- 27 a. On or about May 4, 2026, Axiom transferred \$113,000.00 from its general  
28 account to its trust account. After this transfer, Axiom only had a \$7,963.83

1 balance in its general account, in violation of liquid asset and tangible net  
2 worth requirements of Financial Code section 17210.

3 b. On or about May 5, 2026, Jayne advised that a borrower obtained a loan from  
4 Jayne’s “other client” to “add an additional [\$\$\$]98,000.00.” Jayne provided a  
5 copy of a note signed by Allen Zoura, Zoura Family Trust, dated May 5, 2026,  
6 in favor of Powell Equities LLC for \$98,000.00. Notably, despite the  
7 Examiner’s requests, Jayne failed to provide proof that the funds were received  
8 and deposited in Axiom’s trust account. Instead, the checks and receipts Jayne  
9 did provide contained contradicting information regarding the transfer of funds  
10 between different escrow files, as follows:

- 11 i. Trust check no. 3396 dated May 5, 2026 provided for \$38,000.00  
12 posted in Escrow No. 26-1118, and stated “transfer to **26-1039**  
13 [emphasis added].” However, Receipt 2200 dated May 5, 2026 was  
14 issued for \$38,000.00 in Escrow No. **26-1089** transferred from Escrow  
15 No. 26-1118.
- 16 ii. Trust check no. 3395 dated May 5, 2026 provided for \$60,000.00  
17 posted in Escrow No. **26-1118**, and stated “*transfer to pay gernal [sic]*  
18 *a...*” However, Receipt 2201 dated May 5, 2026 was issued for  
19 \$60,000.00 in Escrow No. **26-1089** transferred from Escrow No. **26-**  
20 **1116**.

21 9. Based on the Examiner’s findings, it appears that Axiom is engaging in a type of  
22 accounts receivable fraud whereby Axiom is continually using newer escrow trust funds to pay for  
23 older trust fund shortages. The DFPI’s investigation is ongoing, as the Examiner continues to  
24 discover additional instances of suspicious activity by Axiom. Given the complicated nature of the  
25 accounts receivable fraud, which involves a high volume of unauthorized transfers between a  
26 significant number of escrow files, the total trust shortage amount will likely be higher than  
27 \$299,154.72. Currently, Jayne, who is responsible for the unauthorized transfers of trust funds as  
28 detailed above, is the only employee at Axiom.

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

4           11.    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 required by  
12 law;

13                   ...

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

18    ///

19    ///

20    ///

21    ///

22    ///

23    ///

24    ///

25    ///

26    ///

27    ///

28    ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

Dated: May 15, 2026

KHALIL MOHSENI  
Commissioner of Financial Protection and Innovation



By \_\_\_\_\_  
MARY ANN SMITH  
Deputy Commissioner  
Enforcement Division