

1 RMA ACCOUNTING SERVICES, INC.
2 1509 W Cameron Ave
3 West Covina, California 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 THE COMMISSIONER OF FINANCIAL PROTECTION AND INNOVATION

11 (COMMISSIONER) FINDS THAT:

- 12 1. Axiom Escrow, Inc. (Axiom) is licensed as an escrow agent under the California
13 Escrow Law (Fin. Code, § 17000 et seq.), with license number 96DBO-187619.
- 14 2. Axiom’s president and sole owner is Gassan K. Jaleel (Jaleel). Currently, Axiom’s
15 sole employee is Jayne Mantel (Jayne), an escrow manager.
- 16 3. The Department of Financial Protection and Innovation (DFPI) received a
17 whistleblower complaint regarding Axiom’s misappropriation and embezzlement of trust account
18 funds.
- 19 4. The DFPI commenced a regulatory examination of Axiom on January 6, 2026. As
20 part of that examination, the DFPI requested a copy of Axiom’s escrow books and records. The
21 DFPI received Axiom’s bank reconciliation for its trust account as of December 31, 2025, but the
22 reconciliation had certain items that required adjustments. Thereafter, the DFPI followed up
23 numerous times with Axiom for the missing information.
- 24 5. On March 13, 2026, the DFPI sent a formal demand letter to Axiom for supporting
25 documents and escrow files to clear the reconciling items, but Axiom only provided some of the
26 documents requested.
- 27 6. On April 27, 2026, the DFPI examiner conducting the examination (Examiner) arrived
28 on site at Axiom’s office to review its books and records. Based on the Examiner’s findings, Axiom
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 17415 provides as follows:

5 (a) If the commissioner, as a result of any examination or from any report
6 made to the commissioner, shall find that any person subject to this
7 division is in an insolvent condition, is conducting or has conducted escrow
8 business in such an unsafe or injurious manner as to render further
9 operations hazardous to the public or to customers, is failing or has failed
10 to comply with the provisions of Section 17212.1 or 17414.1, is permitting
11 or has permitted its tangible net worth to be lower than the minimum
12 required by law, is failing or has failed to maintain its liquid assets in
13 excess of current liabilities as set forth in Section 17210, or is failing or has
14 failed to comply with the bonding requirements of Chapter 2 (commencing
15 with Section 17200) of this division, the commissioner may, by an order
16 addressed to and served by registered or certified mail or by personal
17 service on such person and on any other person having in their possession
18 or control any escrowed funds, trust funds, or other property deposited in
19 escrow with said person, direct discontinuance of the disbursement of trust
20 funds by the parties or any of them, the receipt of trust funds, the delivery
21 or recording of documents received in escrow, or other business operations.
22 No person having in their possession any of these funds or documents shall
23 be liable for failure to comply with the order unless they received written
24 notice of the order. Subject to subdivision (b), the order shall remain in
25 effect until set aside by the commissioner in whole or in part, the person is
26 the subject of an order for relief in bankruptcy, or pursuant to Chapter 6
27 (commencing with Section 17621) of this division the commissioner has
28 assumed possession of the escrow agent.

(b) Within 15 days from the date of an order pursuant to subdivision (a), the
person may request a hearing under the Administrative Procedure Act,
Chapter 5 (commencing with Section 11500) of Division 3 of Title 2 of the
Government Code. Upon receipt of a request, the matter shall be set for
hearing to commence within 30 days after such receipt unless the person
subject to this division consents to a later date. If no hearing is requested
within 15 days after the mailing or service of such notice and none is
ordered by the commissioner, the failure to request a hearing shall
constitute a waiver of the right to a hearing. Neither the request for a
hearing nor the hearing itself shall stay the order issued by the
commissioner under subdivision (a).

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1 NOW, BASED UPON THE FOREGOING, AND GOOD CAUSE APPEARING
2 THEREFOR, IT IS HEREBY ORDERED pursuant to Financial Code section 17415, that Axiom
3 Escrow, Inc., and any person having in his or her possession, custody, or control of any escrow funds,
4 trust funds, general account funds, documents, or other property of Axiom Escrow, Inc., shall
5 immediately discontinue the receipt and disbursement of any such funds, documents, or property.

6 This order is to remain in full force and effect until further order of the Commissioner.

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8 Dated: May 15, 2026

KHALIL MOHSENI
Commissioner of Financial Protection and Innovation



By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division