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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

**TO:** Escrow-time.com  
Laurel Stauske  
54175 Indian Lake Road  
Mason, WI 54856

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 17200, 17210.2 and 17403 of the California Financial Code)**

The California Corporations Commissioner finds that:

1. Escrow-time.com and Laurel Stauske have engaged in the business of an escrow agent by advertising escrow services over the Internet at [www.escrow-time.com](http://www.escrow-time.com) from 2003 to the present as follows:

a) Escrow-time.com represents on its website that the process works as follows: The buyer and seller agree to the terms of the transaction. The buyer pays Escrow-time.com, which verifies the payment. Escrow-time.com notifies the seller to ship its merchandise and then verifies that the buyer receives the shipment. The buyer accepts the goods. Escrow-time.com then pays the seller and the transaction is complete.

b) Escrow-time.com and Laurel Stauske represent on the Escrow-time.com website that their process protects both the buyer and the seller from fraud.

c) Escrow-time.com and Laurel Stauske have represented themselves to be licensed escrow agents by advertising that the company holds Department of Corporations escrow agents' license number 963-2030. In fact, the Department of Corporations issued escrow license number

1 963-2030 to Escrow Time, Inc., in Los Angeles, California, on October 15, 2003. Escrow-time.com  
2 is not a website of Escrow Time, Inc.

3 d) Escrow-time.com and Laurel Stauske have represented that Escrow-time.com is  
4 affiliated with Internet Escrow Services (IES). In fact, IES is an affiliate of Escrow.com and Escrow-  
5 time.com is not affiliated with either IES or Escrow.com.

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7 2. Neither Escrow-time.com nor Laurel Stauske has been issued a license from the  
8 Commissioner authorizing them to conduct business as an escrow agent, as required by California  
9 Financial Code section 17200.

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11 3. Neither Escrow-time.com nor Laurel Stauske is exempt from the licensing requirements of  
12 Section 17200.

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14 4. Neither Escrow-time.com nor Laurel Stauske has been issued a license from the  
15 Commissioner authorizing them to use words indicating that they are in the escrow business, as  
16 required by California Financial Code section 17403.

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18 5. Escrow-time.com and Laurel Stauske have disseminated or caused to be disseminated  
19 false, misleading and/or deceptive statements or representations which refer to Escrow-time.com's  
20 affiliation with IES, when, in fact, Escrow-time.com is not affiliated with IES or Escrow.com.

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22 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that  
23 Escrow-time.com and Laurel Stauske, and their officers, directors, partners, agents, employees and/or  
24 servants are in violation of California Financial Code sections 17200, 17210.2(a) and 17403(a).  
25 Pursuant to California Financial Code section 17416, Escrow-time.com and Laurel Stauske are  
26 hereby ordered to desist and refrain from engaging in the business of receiving escrows for deposit or  
27 delivery without first obtaining a license from the Commissioner. Pursuant to California Financial  
28 Code section 17403(b), Escrow-time.com and Laurel Stauske are further ordered to immediately

1 desist and refrain from issuing, circulating, or publishing any advertisement by means of any  
2 communication, including any website, or making use of or circulating any letterheads, billheads,  
3 blank notes, blank receipts, blank escrow instructions, certificates, circulars, or any written or printed  
4 paper containing any fictitious or corporate name or other words indicating that they are in the  
5 escrow business. Pursuant to California Financial Code section 17210.2(c), Escrow-time.com and  
6 Laurel Stauske are further ordered to immediately desist and refrain from disseminating, or causing  
7 or permitting to be disseminated, in any manner whatsoever, any statement or representation which is  
8 false, misleading, or deceptive, or which omits to state material information, or which refers to the  
9 supervision of that agent by the State of California or any department or official thereof. Escrow-  
10 time.com and Laurel Stauske are further ordered to immediately desist and refrain from  
11 disseminating or causing or permitting to be disseminated, in any manner whatsoever, any statement  
12 or representation that Escrow-time.com is in any manner associated with IES.

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14 This Order is necessary, in the public interest, for the protection of investors and consistent with the  
15 purposes, policies and provisions of the California Escrow Law. This order shall remain in full force  
16 and effect until further order of the California Corporations Commissioner.

17 Dated: April 14, 2005  
18 Sacramento, California

19 WAYNE STRUMPFER  
20 Acting California Corporations Commissioner

21  
22 By: \_\_\_\_\_  
23 ALAN WEINGER  
24 Acting Deputy Commissioner  
25 Enforcement Division  
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