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

TO: Secure-bargain.net
Mark Carlton
Daniella Sabatini
Wolf Valentin
150 High Street North
London, E62HT, United Kingdom

Secure Bargain Ltd.
12 Fountain Place
London, London SW97re, GB

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

The California Corporations Commissioner finds that:

1. Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure Bargain Ltd. have engaged in the business of an escrow agent by advertising escrow services over the internet at www.secure-bargain.net from in or about 2002 to the present as follows:
 - a) Secure-bargain.net represents on its website that the process works as follows: The buyer and seller agree to the terms of a transaction. The buyer then sends payment to Secure-bargain.net, and Secure-bargain.net verifies the funds are good. The seller ships the goods. The buyer accepts the goods, and then Secure-bargain.net pays the seller.
 - b) Secure-bargain.net claims on its website that it protects both buyers and sellers from fraud with this process.

1 c) Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure
2 Bargain Ltd. have represented themselves as intending to “support Internet transactions via an
3 automated, Web-based escrow service holding a buyer’s money until purchased goods are shipped,
4 received, and approved, then paying the seller.”

5 d) Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure
6 Bargain Ltd. have further represented that they provide “the highest quality escrow services to a
7 broad range of companies and government agencies.”
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9 2. Neither Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, nor Secure
10 Bargain Ltd. has been issued a license from the Commissioner authorizing them to conduct business
11 as an escrow agent, as required by California Financial Code section 17200.
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13 3. Neither Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, nor Secure
14 Bargain Ltd. is exempt from the licensing requirements of Section 17200.
15

16 4. Neither Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, nor Secure
17 Bargain Ltd. has been issued a license from the Commissioner authorizing them to use words
18 indicating that they are in the escrow business, as required by California Financial Code section
19 17403.
20

21 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that
22 Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure Bargain Ltd., and
23 their officers directors, partners, agents, employees and/or servants are in violation of California
24 Financial Code sections 17200 and 17403(a). Pursuant to California Financial Code section 17416,
25 Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and Secure Bargain Ltd. 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), Secure-bargain.net, Mark Carlton, Daniella Sabatini, Wolf Valentin, and

1 Secure Bargain Ltd. are further ordered to immediately desist and refrain from issuing, circulating, or
2 publishing any advertisement by means of any communication, including any website, or making use
3 of or circulating any letterheads, billheads, blank notes, blank receipts, blank escrow instructions,
4 certificates, circulars, or any written or printed paper containing any fictitious or corporate name or
5 other words indicating that they are in the escrow business. This Order is necessary, in the public
6 interest, for the protection of investors and consistent with the purposes, policies and provisions of
7 the California Escrow Law. This order shall remain in full force and effect until further order of the
8 California Corporations Commissioner.

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Dated: May 25, 2004
Sacramento, California

WILLIAM P. WOOD
California Corporations Commissioner

By: _____
VIRGINIA JO DUNLAP
Deputy Commissioner
Enforcement and Legal Services