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

**TO:** Paul R. Anderson  
1849 51<sup>st</sup> Street N.E.  
Cedar Rapids, IA 52402

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

Pursuant to Section 17400 of the California Escrow Law (Financial Code Section 17000, et seq.), the California Corporations Commissioner (Commissioner) hereby rescinds its Desist and Refrain Order issued on September 22, 2006, as to Paul R. Anderson only. The Order, pertaining to the unlicensed escrow activity of Bwescrow.com in violation of section 17200, the unlawful advertising practices of Bwescrow.com in violation of section 17403, and Bwescrow.com’s practice of disseminating false, misleading or deceptive information in violation of section 17210.2, remains in effect as to all other persons and/or entities named.

Based on information received after the issuance of the September 22, 2006, Order, the Commissioner is satisfied that Paul R. Anderson is not nor has ever been associated with Bwescrow.com. The Commissioner is satisfied that Paul R. Anderson’s identity was used without his consent by an unknown person(s) creating a fictitious relationship between Paul R. Anderson and Bwescrow.com.

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1           The Commissioner finds that the rescission of this Order as to Paul R. Anderson is necessary  
2 and appropriate, in the public interest, and consistent with the purposes of the policy and provisions  
3 of the Escrow Law.

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5 Dated:           November 6, 2006  
6                    Sacramento, California

7                                   PRESTON DuFAUCHARD  
8                                   California Corporations Commissioner

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10                                   By: \_\_\_\_\_  
11                                   SHARON A. LUERAS  
12                                   Lead Corporations Counsel  
13                                   Enforcement Division

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

**TO:** Bwescrow.com  
5640 S. Maryland  
Chicago, Illinois 60637

Paul R. Anderson  
5842 SW Caldletree Drive, Apt. 3  
Topeka, Kansas 66614

**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. Bwescrow.com and Paul R. Anderson have engaged in business as escrow agents by advertising escrow services over the Internet at [www.bwescrow.com](http://www.bwescrow.com), from 2006 to the present as follows:

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

b) Bwescrow.com claims to protect both the buyer and the seller from fraud with this process.

c) Bwescrow.com and Paul R. Anderson have represented themselves to be licensed escrow agents by advertising that they hold Department of Corporations escrow agents' license number 963-2266. In fact, the Department of Corporations issued escrow license number 963-2266

1 to Beverly West Escrow, Inc., in Whittier, California. However, Bwescrow.com is not a website of  
2 Beverly West Escrow, Inc.

3 d) Bwescrow.com and Paul R. Anderson have represented that the “on-line”  
4 escrow services provided by Bwescrow.com are provided by Internet Escrow Services (IES), and that  
5 IES is “fully licensed and accredited as an escrow company and is subject to compliance with all  
6 applicable escrow regulations.” In fact, IES is an affiliate of Escrow.com, who is licensed by the  
7 Department of Corporations as an escrow agent authorized to conduct personal property escrows over  
8 the Internet, but Bwescrow.com is not affiliated with either IES or Escrow.com.

9 2. Neither Bwescrow.com nor Paul R. Anderson has been issued a license from the  
10 Commissioner authorizing either to conduct business as an escrow agent, as required by California  
11 Financial Code section 17200.

12 3. Neither Bwescrow.com nor Paul R. Anderson is exempt from the licensing requirements of  
13 Section 17200.

14 4. Neither Bwescrow.com nor Paul R. Anderson has been issued a license from the  
15 Commissioner authorizing either to use words indicating that it is in the escrow business, as required  
16 by California Financial Code section 17403.

17 5. Bwescrow.com and Paul R. Anderson have disseminated or caused to be disseminated  
18 false, misleading and/or deceptive statements or representations that they are licensed by the  
19 Department of Corporations.

20 Based upon the foregoing findings, the California Corporations Commissioner is of the  
21 opinion that Bwescrow.com and Paul R. Anderson and their officers, directors, partners, agents,  
22 employees and/or servants are in violation of California Financial Code sections 17200, 17210.2(a)  
23 and 17403(a). Pursuant to California Financial Code section 17416, Bwescrow.com and Paul R.  
24 Anderson are hereby ordered to desist and refrain from engaging in the business of receiving escrows  
25 for deposit or delivery without first obtaining a license from the Commissioner. Pursuant to  
26 California Financial Code section 17403(b), Bwescrow.com and Paul R. Anderson are further  
27 ordered to immediately desist and refrain from issuing, circulating, or publishing any advertisement  
28 by means of any communication, including any website, or making use of or circulating any

1 letterheads, billheads, blank notes, blank receipts, blank escrow instructions, certificates, circulars, or  
2 any written or printed paper containing any fictitious or corporate name or other words indicating that  
3 it is in the escrow business. Pursuant to California Financial Code section 17210.2(c),  
4 Bwescrow.com and Paul R. Anderson are further ordered to immediately desist and refrain from  
5 disseminating, or causing or permitting to be disseminated, in any manner whatsoever, any statement  
6 or representation which is false, misleading, or deceptive, or which omits to state material  
7 information, or which refers to the supervision of that agent by the State of California or any  
8 department or official thereof.

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

12 Dated:           September 22, 2006  
13                   Sacramento, California

14                                   PRESTON DuFAUCHARD  
15                                   California Corporations Commissioner

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17                                   By: \_\_\_\_\_  
18                                   SHARON A. LUERAS  
19                                   Lead Attorney  
20                                   Enforcement Division

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