

1 MARY ANN SMITH
Deputy Commissioner
2 SEAN M. ROONEY
Assistant Chief Counsel
3 DANIELLE A. STOUMBOS (State Bar No. 264784)
Senior Counsel
4 Department of Business Oversight
320 West 4th Street, Ste. 750
5 Los Angeles, California 90013-2344
Telephone: (213) 576-7591
6 Facsimile: (213) 576-7181

7 Attorneys for Complainant

8
9 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT
10 OF THE STATE OF CALIFORNIA

11 In the Matter of:) ESCROW LICENSE NO. 963-2059
12)
13 THE COMMISSIONER OF BUSINESS)
OVERSIGHT,) ORDER TO DISCONTINUE VIOLATIONS
14) PURSUANT TO FINANCIAL CODE
Complainant,) SECTION 17602
15)
16 v.)
17 CITADEL ESCROW INC)
18 Respondent.)
19)
20)

21
22 TO: Citadel Escrow, Inc.
17100 Pioneer Blvd., Suite 312
23 Artesia, California 90701
24

25 The Commissioner of Business Oversight (“Commissioner”) finds that:

26 Citadel Escrow Inc (“Citadel Escrow”) operated an unlicensed branch, processed escrows
27 opened in the unlicensed branch at a licensed branch, and used a non-approved business name in
28 violation of Financial Code sections 17213, subdivision (a), 17213.1, subdivision (a), and 17213.5;
paid non-employee real estate agents and brokers referral fees for soliciting escrow customers in

1 violation of Financial Code section 17420; misrepresented these real estate agents' and brokers'
2 employment status to the Commissioner in violation of Financial Code section 17702; failed to
3 submit, or submitted late fingerprint images and related information of persons seeking employment
4 to the Commissioner in violation of Financial Code section 17414.1, subdivision (d); failed to report
5 employees to the Commissioner before giving them access to Citadel Escrow's trust account in
6 violation of Financial Code section 17419, and Title 10 California Code of Regulations ("CCR"),
7 section 1726; failed to file complete and timely reports with the Commissioner in violation of
8 Financial Code section 17405; failed to disclose Citadel Escrow's sole owner, sole director, and
9 president, Peter Hom's affiliation with Citadel Escrow in escrow instructions in a transaction in
10 which he was the seller, in violation of CCR section 1740.1; and failed to maintain books, records,
11 and accounts in accordance with good business practices in violation of CCR section 1732.

12 NOW, BASED ON THE FOREGOING, AND GOOD CAUSE APPEARING, it is hereby
13 ORDERED under the provisions of the Financial Code sections 17602 and 17604, that Citadel
14 Escrow Inc discontinue the violation(s) set forth above.

15 Dated: August 5, 2016
16 Los Angeles, CA

JAN LYNN OWEN
Commissioner of Business Oversight

17
18 By _____
19 Mary Ann Smith
20 Deputy Commissioner
21 Enforcement Division
22
23
24
25
26
27
28