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

**TO:** RAPTOR CONSULTING, INC.  
ROGER D. HANCE  
9440 Reseda Boulevard, Suite 200  
Northridge, California 91324

**DESIST AND REFRAIN ORDER**  
**(For violations of California Financial Code sections 17200)**

The California Corporations Commissioner finds that:

1. Raptor Consulting, Inc. (“Raptor”) is, and was at all relevant times herein, a California corporation, with its principal place of business located at 9440 Reseda Boulevard, Suite 200, Northridge, California 91324.
2. Roger D. Hance, (“Hance”) is, and was at all times relevant herein, the president of Raptor.
3. Commencing in or about November 2007 and continuing through at least June 20, 2011, Raptor and Hance have engaged in the business of an escrow agent as described below.
4. An examination of Raptor commenced on or about February 4, 2010 by the California Corporations Commissioner (“Commissioner”) disclosed that Raptor and Hance were processing escrow transactions on behalf of the following six (6) licensed real estate brokers: VIP on 99 Enterprises, Inc. dba Closing Solutions; LF Associates, Inc. dba Los Feliz Escrow; Dream Team Real Estate Consultants, Inc. dba Mulholland Escrow; VIP Enterprise, Inc. dba Victory Escrow; Forward Beverly Hills, Inc. dba Canon Hills Closings; and AGL Brentwood, Inc. dba San Vicente Escrow. The instructions for the escrow transactions represented that the real estate companies were processing the escrow transactions, and such processing was being done pursuant to the exemption provided for in Financial Code section 17006(d) (sic). However, Raptor and Hance were actually processing the escrows as follows:
  - (a) Raptor had entered into a contract with each of the real estate brokers to provide escrow staff to open, process, and close escrow transactions for the brokers;

1 (b) The persons processing the escrow transactions were paid employees of  
2 Raptor;

3 (c) The escrow transactions were processed at the offices of Raptor and under  
4 the supervision of Raptor;

5 (d) Raptor employees were simultaneously processing escrow transactions for  
6 all six (6) real estate brokers;

7 (e) The network and software used to process the escrow transactions was  
8 owned by R.R. Gable Real Estate Group, Inc., a corporation, owned by Hance; and

9 (f) The email address for which escrow customers and others were to contact  
10 the escrow officers regarding escrow transactions for each of the six (6) real estate brokers was  
11 registered to Hance;

12 5. Financial Code section 17006(a)(4) provides an exemption from the licensing  
13 provisions of the Escrow Law for “[a]ny broker licensed by the Real Estate Commissioner while  
14 performing acts in the course of or incidental to a real estate transaction in which the broker is an  
15 agent or party to the transaction in which the broker is performing an act for which a real estate  
16 license is required.” Financial Code section 17006 goes on to provide at subsection (b) that  
17 “[t]he exemptions provided for in paragraphs . . . (4) are personal to the persons listed, and those  
18 persons shall not delegate any duties other than duties performed under the direct supervision of  
19 those persons. Notwithstanding the provisions of this subdivision, the exemptions provided for  
20 in paragraphs . . . (4) are not available for any business arrangement entered into for the purpose  
21 of performing escrows for more than one business.”

22 6. A follow up examination of Raptor commenced on or about June 21, 2011,  
23 disclosed that Raptor and Hance were continuing to process escrow transactions on behalf of  
24 numerous licensed real estate brokers; to wit: VIP on 99 Enterprises, Inc. dba Closing Solutions;  
25 LF Associates, Inc. dba Los Feliz Escrow; Dream Team Real Estate Consultants, Inc. dba  
26 Mulholland Escrow; VIP Enterprise, Inc. dba Victory Escrow; Forward Beverly Hills, Inc. dba  
27 Canon Hills Closings; Forward Wilshire, Inc. dba Larchmont Escrow; and Forward Calabasas,  
28 Inc. dba Parkway Escrow, as follows:

1 (a) Raptor had entered into a contract with each of the real estate brokers to  
2 provide escrow staff to open, process, and close escrow transactions for the brokers;

3 (b) The escrow officers continued to receive the majority of their pay for  
4 processing escrow transactions from Raptor;

5 (c) The escrow support staff were paid employees of Raptor;

6 (d) The escrow transactions were processed at the offices of Raptor and under  
7 the supervision of Raptor;

8 (e) Raptor employees were simultaneously processing escrow transactions for  
9 all seven (7) real estate brokers;

10 (f) The network and software used to process the escrow transactions  
11 continued to be owned by Hance’s company, R.R. Gable Real Estate Group, Inc.;

12 (g) The email address for which escrow customers and others were to contact  
13 the escrow officers regarding escrow transactions for each of the seven (7) real estate brokers  
14 was registered to Hance; and

15 (h) A sign on the front door of Raptor stated “Escrow Services – Suite 200 –  
16 We are Open”.

17 7. Neither Raptor nor Hance has been issued a license by the Commissioner  
18 authorizing it to engage in business as an escrow agent under the California Escrow Law  
19 (“Escrow Law”) (California Financial Code §§ 17000 et seq.).

20 8. Neither Raptor, Hance, nor the escrow transactions were exempt from the  
21 licensing requirements of California Financial Code section 17200.

22 By reason of the foregoing, the California Corporations Commissioner is of the opinion that  
23 Raptor and Hance and their officers, directors, partners, agents, employees and/or servants have  
24 engaged in unlicensed escrow business in violation of California Financial Code Section 17200.

25 Pursuant to California Financial Code section 17416, Raptor Consulting, Inc. and Roger D.  
26 Hance are hereby ordered to desist and refrain from engaging in the business of receiving escrows  
27 for deposit or delivery without first obtaining a license from the Commissioner, or otherwise being  
28 exempt.

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

California Financial Code section 17416 provides:

Whenever in the opinion of the commissioner any person, except as named in Section 17006, is engaged, either actually or through subterfuge, in the business of receiving escrows for deposit or delivery as defined in this division, without a license from the commissioner, the commissioner may order that person to desist and refrain from engaging in that business. If, within 30 days after such an order is served, a request for a hearing is filed in writing and the hearing is not held within 60 days thereafter, the order is rescinded.

Dated: November 30, 2011  
Los Angeles, CA

PRESTON DuFAUCHARD  
California Corporations Commissioner

By \_\_\_\_\_  
Alan S. Weinger  
Deputy Commissioner  
Enforcement Division