

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

<b>TO:</b>	Poescrow.com 38 W. Wrightwood Chicago, IL 60139	PO Inc. P.O. Box 3490 Los Altos, CA 94024
	Wellesley Road 36 London, NW5 4-PN United Kingdom	Rhonda Stratton P.O. Box 3490 Los Altos, CA 94024

**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. Poescrow.com, PO Inc. and Rhonda Stratton have engaged in the business of an escrow agent by advertising escrow services over the Internet at [www.poescrow.com](http://www.poescrow.com), from 2005 to the present as follows:

a) Poescrow.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 Poescrow.com, which verifies the payment. Poescrow.com notifies the seller to ship its merchandise and then verifies that the buyer receives the shipment. The buyer accepts the goods. Poescrow.com then pays the seller and the transaction is complete.

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

c) Poescrow.com, PO Inc. and Rhonda Stratton have represented themselves to be licensed escrow agents by advertising that the company is Prime One Escrow, Inc., located in La Mirada, California, and that it holds Department of Corporations escrow agents' license number 963-

1 2143. In fact, the Department of Corporations issued escrow license number 963-2143 to Prime One  
2 Escrow, Inc., in La Mirada, California, on November 12, 2004. Poescrow.com is not a website of  
3 Prime One Escrow, Inc.

4 d) Poescrow.com, PO Inc. and Rhonda Stratton have represented that the escrow  
5 services provided by Poescrow.com are provided by Internet Escrow Services (IES), and that IES is  
6 “fully licensed and accredited as an escrow company and is subject to compliance with all applicable  
7 escrow regulations.” In fact, IES is an affiliate of Escrow.com and Poescrow.com is not affiliated  
8 with either IES or Escrow.com.

9  
10 2. Neither Poescrow.com, PO Inc. nor Rhonda Stratton has been issued a license from the  
11 Commissioner authorizing them to conduct business as an escrow agent, as required by California  
12 Financial Code section 17200.

13  
14 3. Neither Poescrow.com, PO Inc. nor Rhonda Stratton is exempt from the licensing  
15 requirements of Section 17200.

16  
17 4. Neither Poescrow.com, PO Inc. nor Rhonda Stratton has been issued a license from the  
18 Commissioner authorizing them to use words indicating that they are in the escrow business, as  
19 required by California Financial Code section 17403.

20  
21 5. Poescrow.com, PO Inc. and Rhonda Stratton have disseminated or caused to be  
22 disseminated false, misleading and/or deceptive statements or representations which refer to  
23 Poescrow.com’s affiliation with IES, when, in fact, Poescrow.com is not affiliated with IES in any  
24 way.

25  
26 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that  
27 Poescrow.com, PO Inc. and Rhonda Stratton and their officers, directors, partners, agents, employees  
28 and/or servants are in violation of California Financial Code sections 17200, 17210.2(a) and

1 17403(a). Pursuant to California Financial Code section 17416, Poescrow.com, PO Inc. and Rhonda  
2 Stratton are hereby ordered to desist and refrain from engaging in the business of receiving escrows  
3 for deposit or delivery without first obtaining a license from the Commissioner. Pursuant to  
4 California Financial Code section 17403(b), Poescrow.com, PO Inc. and Rhonda Stratton are further  
5 ordered to immediately desist and refrain from issuing, circulating, or publishing any advertisement  
6 by means of any communication, including any website, or making use of or circulating any  
7 letterheads, billheads, blank notes, blank receipts, blank escrow instructions, certificates, circulars, or  
8 any written or printed paper containing any fictitious or corporate name or other words indicating that  
9 they are in the escrow business. Pursuant to California Financial Code section 17210.2(c),  
10 Poescrow.com, PO Inc. and Rhonda Stratton are further ordered to immediately desist and refrain  
11 from disseminating, or causing or permitting to be disseminated, in any manner whatsoever, any  
12 statement or representation which is false, misleading, or deceptive, or which omits to state material  
13 information, or which refers to the supervision of that agent by the State of California or any  
14 department or official thereof. Poescrow.com, PO Inc. and Rhonda Stratton are further ordered to  
15 immediately desist and refrain from disseminating or causing or permitting to be disseminated, in any  
16 manner whatsoever, any statement or representation that Poescrow.com is in any manner associated  
17 with IES.

18  
19 This Order is necessary, in the public interest, for the protection of investors and consistent with the  
20 purposes, policies and provisions of the California Escrow Law. This order shall remain in full force  
21 and effect until further order of the California Corporations Commissioner.

22 Dated: July 25, 2005  
23 Sacramento, California

24 WAYNE STRUMPFER  
25 Acting California Corporations Commissioner

26 By: \_\_\_\_\_  
27 ALAN S. WEINGER  
28 Acting Deputy Commissioner  
Enforcement Division