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

**TO:** Safely-trade.net  
Chastity A. Guevara  
P.O. Box 752  
Arizona City, AZ 85223

**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. Safely-trade.net and Chastity A. Guevara have engaged in the business of an escrow agent by advertising escrow services over the internet at [www.safely-trade.net](http://www.safely-trade.net) from 2000 to the present as follows:

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

b) Safely-trade.net and Chastity A. Guevara have represented themselves to be licensed escrow agents by claiming that Safely-trade.net is “fully licensed and accredited as an escrow company” and is “subject to compliance with all applicable escrow regulations.”

c) Safely-trade.net and Chastity A. Guevara have represented that Safely-trade.net is affiliated with Internet Escrow Services (IES). In fact, IES is an affiliate of Escrow.com and Safely-

1 trade.net is not affiliated with either IES or Escrow.com.

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3 2. Neither Safely-trade.net nor Chastity A. Guevara has been issued a license from the  
4 Commissioner authorizing them to conduct business as an escrow agent, as required by California  
5 Financial Code section 17200.

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7 3. Neither Safely-trade.net nor Chastity A. Guevara is exempt from the licensing  
8 requirements of Section 17200.

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10 4. Neither Safely-trade.net nor Chastity A. Guevara has been issued a license from the  
11 Commissioner authorizing them to use words indicating that they are in the escrow business, as  
12 required by California Financial Code section 17403.

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14 5. Safely-trade.net and Chastity A. Guevara have disseminated or caused to be disseminated  
15 false, misleading and/or deceptive statements or representations which refer to Safely-trade.net's  
16 affiliation with IES, when, in fact, Safely-trade.net is not affiliated with IES in any way.

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18 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that  
19 Safely-trade.net and Chastity A. Guevara and their officers directors, partners, agents, employees  
20 and/or servants are in violation of California Financial Code sections 17200, 17210.2(a) and  
21 17403(a). Pursuant to California Financial Code section 17416, Safely-trade.net and Chastity A.  
22 Guevara are hereby ordered to desist and refrain from engaging in the business of receiving escrows  
23 for deposit or delivery without first obtaining a license from the Commissioner. Pursuant to  
24 California Financial Code section 17403(b), Safely-trade.net and Chastity A. Guevara are further  
25 ordered to immediately desist and refrain from issuing, circulating, or publishing any advertisement  
26 by means of any communication, including any website, or making use of or circulating any  
27 letterheads, billheads, blank notes, blank receipts, blank escrow instructions, certificates, circulars, or  
28 any written or printed paper containing any fictitious or corporate name or other words indicating that

1 they are in the escrow business. Pursuant to California Financial Code section 17210.2(c), Safely-  
2 trade.net and Chastity A. Guevara are further ordered to immediately desist and refrain from  
3 disseminating, or causing or permitting to be disseminated, in any manner whatsoever, any statement  
4 or representation which is false, misleading, or deceptive, or which omits to state material  
5 information, or which refers to the supervision of that agent by the State of California or any  
6 department or official thereof. Safely-trade.net and Chastity A. Guevara are further ordered to  
7 immediately desist and refrain from disseminating or causing or permitting to be disseminated, in any  
8 manner whatsoever, any statement or representation that Safely-trade.net is in any manner associated  
9 with IES.

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

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15 Dated: December 31, 2004  
16 Sacramento, California

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18 WILLIAM P. WOOD  
19 California Corporations Commissioner

20 By: \_\_\_\_\_  
21 WAYNE STRUMPFER  
22 Acting Deputy Commissioner  
23 Enforcement and Legal Services  
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