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

**TO:** TraderOnlineEscrow.com  
Rebecca Mazzaro  
5014 Station Road  
Grantville, PA 17028

**DESIST AND REFRAIN ORDER**

**(For violations of sections 17200 and 17403 of the California Financial Code)**

The California Corporations Commissioner finds that:

1. TraderOnlineEscrow.com and Rebecca Mazzaro have engaged in the business of an escrow agent by advertising escrow services over the internet at [www.traderonlineescrow.com](http://www.traderonlineescrow.com) from in or about 1999 to the present as follows:

a) TraderOnlineEscrow.com represents on its website that the process works as follows: The buyer and seller agree to the terms of a transaction. The buyer then sends payment to TraderOnlineEscrow.com, and TraderOnlineEscrow.com verifies the funds are good. The seller ships the goods. The buyer notifies TraderOnlineEscrow.com that he or she is satisfied with the goods, and then TraderOnlineEscrow.com pays the seller.

b) TraderOnlineEscrow.com claims on its website that it protects both buyers and sellers from fraud with this process.

c) TraderOnlineEscrow.com and Rebecca Mazzaro have represented themselves to be

1 “a federally-incorporated US business corporation registered with the governments of US,” and “in  
2 full compliance with all laws and regulations governing its business activities.”

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4 2. Neither TraderOnlineEscrow.com nor Rebecca Mazzaro has been issued a license from the  
5 Commissioner authorizing them to conduct business as an escrow agent, as required by California  
6 Financial Code section 17200.

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8 3. Neither TraderOnlineEscrow.com nor Rebecca Mazzaro is exempt from the licensing  
9 requirements of Section 17200.

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11 4. Neither TraderOnlineEscrow.com nor Rebecca Mazzaro has been issued a license from the  
12 Commissioner authorizing them to use words indicating that they are in the escrow business, as  
13 required by California Financial Code section 17403.

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

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

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Dated: May 20, 2004  
Sacramento, California

WILLIAM P. WOOD  
California Corporations Commissioner

By: \_\_\_\_\_  
VIRGINIA JO DUNLAP  
Deputy Commissioner  
Enforcement and Legal Services