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

**TO:** Safetradedivision.com  
Safe Trade Division  
20969 Ventura Boulevard  
Woodland Hills, CA 91364

Mary Lou Van Arsdel  
9750 Sweetwater Lane  
Carlton, OR 97111

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 17200 and 17403 of the California Financial Code)**

The California Corporations Commissioner finds that:

1. Safetradedivision.com, Safe Trade Division and Mary Lou Van Arsdel have engaged in the business of an escrow agent by advertising escrow services over the internet at www.safetradedivision.com from 2004 to the present as follows:

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

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

c) Safetradedivision.com, Safe Trade Division and Mary Lou Van Arsdel have represented themselves to be licensed escrow agents by advertising that the company is Safe Trade

1 Division, located in Woodland Hills, California, and that it holds Department of Corporations escrow  
2 agents' license number 963-1938. In fact, the Department of Corporations issued escrow license  
3 number 963-1938 to Advanced Escrow Corporation, in Monarch Beach, California, on April 15,  
4 2002. Safetradedivision.com is not a website of Advanced Escrow Corporation.

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6 2. Neither Safetradedivision.com, Safe Trade Division nor Mary Lou Van Arsdel has been  
7 issued a license from the Commissioner authorizing them to conduct business as an escrow agent, as  
8 required by California Financial Code section 17200.

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10 3. Neither Safetradedivision.com, Safe Trade Division nor Mary Lou Van Arsdel is exempt  
11 from the licensing requirements of Section 17200.

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13 4. Neither Safetradedivision.com, Safe Trade Division nor Mary Lou Van Arsdel has been  
14 issued a license from the Commissioner authorizing them to use words indicating that they are in the  
15 escrow business, as required by California Financial Code section 17403.

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

1 escrow business.

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

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7 Dated: July 25, 2005  
8 Sacramento, California

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10 WAYNE STRUMPFER  
11 Acting California Corporations Commissioner

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13 By: \_\_\_\_\_  
14 ALAN S. WEINGER  
15 Acting Deputy Commissioner  
16 Enforcement Division

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