

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

TO: Mark D. Zarubi, aka Mark Dzarubi, aka Mark D. Squires
X-Change Reciprocal Services, LLC
P.O. Box 60334
Reno, Nevada 89506

Mark D. Zarubi, aka Mark Dzarubi, aka Mark D. Squires
X-Change Reciprocal Services, LLC
c/o Wells Fargo Bank
Wells Fargo Bank
200 Lemon Drive
Reno, Nevada 89506

Mark D. Zarubi, aka Mark Dzarubi, aka Mark D. Squires
X-Change Reciprocal Services, LLC
2900 Vassar Way #307
Reno, Nevada 89502

DESIST AND REFRAIN ORDER

The California Corporations Commissioner finds that:

1. Classified ads have been and currently are placed on the Internet at such sites as Yahoo.com, Infospace.com and Classifieds2000.com offering for sale products including computers and computer-related equipment such as docking stations. When members of the public contact the purported sellers by email and express interest in purchasing the items advertised, the purported sellers suggest that the buyers use the escrow services of a company located at the Internet site Secure-Escrow.com in connection with the transaction.

2. The Internet site of Secure-Escrow.com represents that the company is located in Montgomery, Alabama and that it provides escrow services through a subsidiary called Hardfort Escrow, Inc. The Internet site claims that Hardfort Escrow, Inc. "is fully licensed and accredited as an escrow company" and that it possesses license number #8237136 issued by the California Department of Corporations.

3. In fact, Hardfort Escrow, Inc. is not a company licensed by the California Department of Corporations, and the Department of Corporations has no outstanding escrow license numbered 8237136.

4. Members of the public who have registered with Secure-Escrow.com have been instructed to wire funds for the purchase of computers and computer-related equipment to bank account number 0403954282 at the Wells Fargo Bank branch located at 200 Lemmon Drive in Reno, Nevada 89506, ABA # 321-270-742. The prospective purchasers have been told that the account is held in the name of X-Change Reciprocal Services, LLC, a business purportedly located at 2900 Vassar Way #307 in Reno, Nevada 89502. Prospective purchasers have wired funds to that account as instructed, based upon assurances that the products will then be shipped to them. Thereafter, the products have not been shipped to the purchasers.

5. Prospective purchasers who have wired funds to account number 0403954282 and not received the products they have attempted to purchase have contacted the Wells Fargo branch at 775-677-6060 and have been directed by bank personnel to Mark Zarubi of X-Change Reciprocal Services, LLC, phone number 775-846-9191.

6. According to records of the Nevada Secretary of State, X-Change Reciprocal Services, LLC is a limited liability company with its registered office at 675 Fairview Drive #246, Carson City, NV 89701. According to records of the Nevada Secretary of State, Mark Zarubi is the president of X-Change Reciprocal Services and his address is P.O. Box 60334, Reno, Nevada 89506.

Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that Mark D. Zarubi, aka Mark Dzarubi, aka Mark D. Squires, and X-Change Reciprocal Services, LLC are engaged either actually or through subterfuge, in the business of receiving escrows for deposit and/or delivery as defined in the California Escrow Law without a license from the Commissioner. Accordingly, it is hereby ordered pursuant to Corporations Code section 17416 that Mark D. Zarubi, aka Mark Dzarubi, aka Mark D. Squires, and X-Change Reciprocal Services, LLC hereby desist and refrain from engaging in that business.

Dated: March 14, 2002
Sacramento, California

DEMETRIOS A. BOUTRIS
California Corporations Commissioner

By _____
VIRGINIA JO DUNLAP
Acting Supervising Counsel
Enforcement and Legal Services Division