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

**TO:** California-safetrade.com  
Jose Sterling  
517 Woodland Drive  
Rossford, Ohio 43460

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

The California Corporations Commissioner finds that:

1. California-safetrade.com and Jose Sterling have engaged in the business of an escrow agent by advertising escrow services over the internet at [www.California-safetrade.com](http://www.California-safetrade.com) from 2002 to the present as follows:

a) California-safetrade.com represents on its website that the process works as follows: the buyer pays California-safetrade.com the amount of the purchase price plus any shipping and escrow fees. The seller then ships the goods. Once the buyer has received the goods and is satisfied, California-safetrade.com pays the transaction price, less its fee, to the seller.

b) California-safetrade.com claims on its website that its process protects both buyers and sellers from fraud.

c) California-safetrade.com and Jose Sterling have represented themselves to be licensed escrow agents by claiming that the company is California Escrow Service, Inc., located at 618 S. Serrano Avenue, Second Floor, Los Angeles, California, 90005, license number 9631948.

d) In fact, the Department of Corporations issued escrow agent's license number 963-1948 to California Escrow Service, Inc., located at the above-referenced Serrano Avenue address on

1 June 25, 2002. California-safetrade.com is not a website of California Escrow Service, Inc., and  
2 California Escrow Service, Inc., does not process escrows involving personal property over the  
3 internet.

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5 2. Neither California-safetrade.com nor Jose Sterling has been issued a license from the  
6 Commissioner authorizing them to conduct business as an escrow agent, as required by California  
7 Financial Code section 17200.

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9 3. Neither California-safetrade.com nor Jose Sterling is exempt from the licensing  
10 requirements of Section 17200.

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

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

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: October 6, 2004  
Sacramento, California

WILLIAM P. WOOD  
California Corporations Commissioner

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