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

**TO:** California-trade.com  
Robert Shipley  
1210 E. 27th Street  
Tulsa, OK 74114

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

The California Corporations Commissioner finds that:

1. California-trade.com and Robert Shipley have engaged in the business of an escrow agent by advertising escrow services over the internet at [www.california-trade.com](http://www.california-trade.com) from in or about 2002 to the present as follows:

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

b) California-trade.com claims on its website that it protects both buyers and sellers from fraud with these procedures.

c) California-trade.com and Robert Shipley have represented themselves to be licensed escrow agents by advertising that the company is California Escrow Service, Inc., located at 618 S. Serrano Ave., 2nd Floor, Los Angeles, CA 90005, license number 9631948

d) Although the Department of Corporations issued escrow license number 963-1948

1 to California Escrow Service, Inc., at the above-listed Los Angeles address, neither Robert Shipley  
2 nor California-trade.com are affiliated with California Escrow Service, Inc. California Escrow  
3 Service, Inc., does not have a website and does not process escrows involving personal property over  
4 the internet.

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

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10 4. Neither California-trade.com nor Robert Shipley is exempt from the licensing  
11 requirements of Section 17200.

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13 5. Neither California-trade.com nor Robert Shipley has been issued a license from the  
14 Commissioner authorizing them to use words indicating that they are in the escrow business, as  
15 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 California-trade.com and Robert Shipley and their officers directors, partners, agents, employees  
19 and/or servants are in violation of California Financial Code sections 17200 and 17403(a). Pursuant  
20 to California Financial Code section 17416, California-trade.com and Robert Shipley are hereby  
21 ordered to desist and refrain from engaging in the business of receiving escrows for deposit or  
22 delivery without first obtaining a license from the Commissioner. Pursuant to California Financial  
23 Code section 17403(b), California-trade.com and Robert Shipley are further ordered to immediately  
24 desist and refrain from issuing, circulating, or publishing any advertisement by means of any  
25 communication, including any website, or making use of or circulating any letterheads, billheads,  
26 blank notes, blank receipts, blank escrow instructions, certificates, circulars, or any written or printed  
27 paper containing any fictitious or corporate name or other words indicating that they are in the  
28 escrow business. This Order is necessary, in the public interest, for the protection of investors and

1 consistent with the purposes, policies and provisions of the California Escrow Law. This order shall  
2 remain in full force and effect until further order of the California Corporations Commissioner.

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Dated: May 11, 2004  
Sacramento, California

WILLIAM P. WOOD  
California Corporations Commissioner

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