

1 STATE OF CALIFORNIA
2 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
3 DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

4 TO: FieldNation, LLC
5 FieldNation.com
6 733 Marquette Avenue S, #800
7 Minneapolis, Minnesota 55402

8 **DESIST AND REFRAIN ORDER**
9 **(Violation of Financial Code section 17200)**

10 The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

11 1. At all relevant times herein, FieldNation, LLC (FieldNation) is a Minnesota limited
12 liability company with its principal place of business at 733 Marquette Avenue S, #800, Minneapolis,
13 Minnesota 55402.

14 2. At all relevant times herein, FieldNation engaged in the business of an escrow agent
15 over the Internet at <https://FieldNation.com> (FieldNation.com) by offering the following terms on its
16 website:

17 (a) "A Provider who performs work for a Buyer under a Work Order through the Platform
18 will be paid by Field Nation on behalf of the Buyer. As a condition of being allowed to post and accept
19 Work Orders between Buyers and Providers via the Platform, Buyer must deposit funds with Field
20 Nation or meet Field Nation's credit requirements. Any Buyer funds held by Field Nation will be held
21 in a custodial account and will be commingled with the funds of other Buyers."

22 (b) "Once the Buyer authorizes its acceptance of a completed Work Order through the
23 Platform in accordance with the Work Order Terms and Field Nation facilitates Buyer's payment for
24 services under the Work Order to the Provider, Field Nation shall have no further financial obligation
25 with respect to Buyer or Provider under that Work Order."

26 (c) "Payment from Buyer will only be released to Provider by Field Nation after Provider:
27 (a) has completed all services stated in a Work Order, (b) has verified, via the Platform, that the services
28 have been completed, and (c) the Buyer has accepted, via the Platform, the services."

1 (d) "Provider will receive payment for the services provided by Provider to the Buyer as
2 stated in any applicable Work Orders, less any fees payable to Field Nation for use of the Platform as
3 published from time to time. Field Nation will process payments from Buyers to Providers for
4 completed Work Orders. Provider will be paid with funds deposited with Field Nation by Buyers. No
5 other fees, benefits, or payments of any kind will be payable to Provider."

6 3. The Commissioner has not issued a license to FieldNation LLC or FieldNation.com to
7 conduct business as an escrow agent, as required under Financial Code section 17200.

8 Based upon the foregoing findings, the Commissioner of Financial Protection and Innovation
9 is of the opinion that FieldNation, LLC and FieldNation.com have engaged in the business of an
10 escrow agent without first obtaining a license from the Commissioner of Financial Protection and
11 Innovation, in violation of Financial Code section 17200.

12 Under Financial Code section 17416, FieldNation LLC and FieldNation.com are ordered to
13 desist and refrain from engaging in the business of receiving escrows for deposit or delivery without
14 first obtaining a license from the Commissioner of Financial Protection and Innovation.

15 This Order is necessary, in the public interest, and consistent with the purposes, policies, and
16 provisions of the Escrow Law.

17 Dated: November 18, 2020
18 Los Angeles, California

MANUEL P. ALVAREZ
Commissioner of Financial Protection and Innovation



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21 By: _____
22 MARY ANN SMITH
23 Deputy Commissioner
24 Enforcement Division
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