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

**TO:** 3rdpartyonline.com  
Emmanuel Quentin  
18 Rue Saint Gilles  
Paris, 75003, France

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

The California Corporations Commissioner finds that:

1. 3rdpartyonline.com and Emmanuel Quentin have engaged in the business of an escrow agent by advertising escrow services over the internet at [www.3rdpartyonline.com](http://www.3rdpartyonline.com) from on or about April 19, 2004, to the present as follows:

a) 3rdpartyonline.com represents on its website that the process works as follows:

The buyer and seller agree to the terms of a transaction. The buyer then sends payment to 3rdpartyonline.com, and payment is verified. 3rdpartyonline.com notifies the seller to ship the goods. The buyer receives, inspects, and approves the goods, and notifies 3rdpartyonline.com. 3rdpartyonline.com then sends the funds to the seller after all conditions of the transaction have been met.

b) 3rdpartyonline.com claims on its website that it protects both buyers and sellers from fraud with its “simple trust process.”

c) 3rdpartyonline.com and Emmanuel Quentin have represented themselves to be a

1 “competitive escrow service” with a staff to “assist with all your escrow transactions.”

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3 2. Neither 3rdpartyonline.com nor Emmanuel Quentin has been issued a license from the  
4 Commissioner authorizing them to conduct business as an escrow agent, as required by California  
5 Financial Code section 17200.

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7 3. Neither 3rdpartyonline.com nor Emmanuel Quentin is exempt from the licensing  
8 requirements of Section 17200.

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10 4. Neither 3rdpartyonline.com nor Emmanuel Quentin has been issued a license from the  
11 Commissioner authorizing them to use words indicating that they are in the escrow business, as  
12 required by California Financial Code section 17403.

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14 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that  
15 3rdpartyonline.com and Emmanuel Quentin and their officers directors, partners, agents, employees  
16 and/or servants are in violation of California Financial Code sections 17200 and 17403(a). Pursuant  
17 to California Financial Code section 17416, 3rdpartyonline.com and Emmanuel Quentin are hereby  
18 ordered to desist and refrain from engaging in the business of receiving escrows for deposit or  
19 delivery without first obtaining a license from the Commissioner. Pursuant to California Financial  
20 Code section 17403(b), 3rdpartyonline.com and Emmanuel Quentin are further ordered to  
21 immediately desist and refrain from issuing, circulating, or publishing any advertisement by means of  
22 any communication, including any website, or making use of or circulating any letterheads, billheads,  
23 blank notes, blank receipts, blank escrow instructions, certificates, circulars, or any written or printed  
24 paper containing any fictitious or corporate name or other words indicating that they are in the  
25 escrow business.

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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: May 24, 2004  
Sacramento, California

WILLIAM P. WOOD  
California Corporations Commissioner

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