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

TO: Lacy Bryant
1808 Brayless
Baytown, TX 77520

RESCISSION OF DESIST AND REFRAIN ORDER
(For violations of sections 17200, 17210.2 and 17403 of the California Financial Code)

Pursuant to Section 17400 of the California Escrow Law (Financial Code Section 17000, et seq.), the California Corporations Commissioner (Commissioner) hereby rescinds its Desist and Refrain Order issued on December 31, 2004, as to Lacy Bryant only. The Order, pertaining to the unlicensed escrow activity of Escrow-tripledeals.com in violation of section 17200, the unlawful advertising practices of Escrow-tripledeals.com in violation of section 17403, and Escrow-tripledeals.com’s practice of disseminating false, misleading or deceptive information in violation of section 17210.2, remains in effect as to all other persons and/or entities named.

Based on information received after the issuance of the December 31, 2004, Order, the Commissioner is satisfied that Lacy Bryant is not now and has never been associated with Escrow-tripledeals.com. The Commissioner is satisfied that Lacy Bryant’s identity was used without her consent by an unknown person(s) creating a fictitious relationship between Lacy Bryant and Escrow-tripledeals.com.

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The Commissioner finds that the rescission of this Order as to Lacy Bryant is necessary and appropriate in the public interest, and consistent with the purposes of the policy and provisions of the Escrow Law.

Dated: May 16, 2005
Sacramento, California

WAYNE STRUMPFER
Acting California Corporations Commissioner

By: _____
ALAN WEINGER
Acting Deputy Commissioner
Enforcement Division

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

TO: Escrow-tripledeals.com
Lacy Bryant
1808 Brayless
Baytown, TX 77520

DESIST AND REFRAIN ORDER
(For violations of sections 17200, 17210.2 and 17403 of the California Financial Code)

The California Corporations Commissioner finds that:

1. Escrow-tripledeals.com and Lacy Bryant have engaged in the business of an escrow agent by advertising escrow services over the internet at www.escrow-tripledeals.com from 1999 to the present as follows:

a) Escrow-tripledeals.com represents on its website that the process works as follows: The buyer and seller agree to the terms of the transaction. The buyer pays Escrow-tripledeals.com. Escrow-tripledeals.com verifies payment and then notifies the seller to ship its merchandise. The buyer receives and inspects the merchandise, and once the buyer accepts the goods, Escrow-tripledeals.com pays the seller.

b) Escrow-tripledeals.com claims to protect both the buyer and the seller from fraud with this process.

c) Escrow-tripledeals.com and Lacy Bryant have represented themselves to be licensed escrow agents by claiming to be “fully licensed and accredited as an escrow company” and

1 “subject to compliance with all applicable escrow regulations.”

2 d) Escrow-tripledeals.com and Lacy Bryant have represented that Escrow-
3 tripledeals.com is affiliated with Internet Escrow Services (IES) and that it is a subsidiary of Fidelity
4 National Financial, Inc. In fact, IES is an affiliate of Escrow.com and Escrow.com is a subsidiary of
5 Fidelity National Financial, Inc. Escrow-tripledeals.com is not affiliated with either IES, Fidelity
6 National Financial, Inc., or Escrow.com.

7
8 2. Neither Escrow-tripledeals.com nor Lacy Bryant has been issued a license from the
9 Commissioner authorizing them to conduct business as an escrow agent, as required by California
10 Financial Code section 17200.

11
12 3. Neither Escrow-tripledeals.com nor Lacy Bryant is exempt from the licensing
13 requirements of Section 17200.

14
15 4. Neither Escrow-tripledeals.com nor Lacy Bryant has been issued a license from the
16 Commissioner authorizing them to use words indicating that they are in the escrow business, as
17 required by California Financial Code section 17403.

18
19 5. Escrow-tripledeals.com and Lacy Bryant have disseminated or caused to be disseminated
20 false, misleading and/or deceptive statements or representations which refer to Escrow-
21 tripledeals.com’s affiliation with IES and Fidelity National Financial, Inc., when, in fact, Escrow-
22 tripledeals.com is not affiliated with either IES or Fidelity National Financial, Inc.

23
24 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that
25 Escrow-tripledeals.com and Lacy Bryant and their officers directors, partners, agents, employees
26 and/or servants are in violation of California Financial Code sections 17200, 17210.2(a) and
27 17403(a). Pursuant to California Financial Code section 17416, Escrow-tripledeals.com and Lacy
28 Bryant are hereby ordered to desist and refrain from engaging in the business of receiving escrows

1 for deposit or delivery without first obtaining a license from the Commissioner. Pursuant to
2 California Financial Code section 17403(b), Escrow-tripledeals.com and Lacy Bryant are further
3 ordered to immediately desist and refrain from issuing, circulating, or publishing any advertisement
4 by means of any communication, including any website, or making use of or circulating any
5 letterheads, billheads, blank notes, blank receipts, blank escrow instructions, certificates, circulars, or
6 any written or printed paper containing any fictitious or corporate name or other words indicating that
7 they are in the escrow business. Pursuant to California Financial Code section 17210.2(c), Escrow-
8 tripledeals.com and Lacy Bryant are further ordered to immediately desist and refrain from
9 disseminating, or causing or permitting to be disseminated, in any manner whatsoever, any statement
10 or representation which is false, misleading, or deceptive, or which omits to state material
11 information, or which refers to the supervision of that agent by the State of California or any
12 department or official thereof. Escrow-tripledeals.com and Lacy Bryant are further ordered to
13 immediately desist and refrain from disseminating or causing or permitting to be disseminated, in any
14 manner whatsoever, any statement or representation that Escrow-tripledeals.com is in any manner
15 associated with IES or Fidelity National Financial, Inc.

16
17 This Order is necessary, in the public interest, for the protection of investors and consistent with the
18 purposes, policies and provisions of the California Escrow Law. This order shall remain in full force
19 and effect until further order of the California Corporations Commissioner.

20
21 Dated: December 31, 2004
22 Sacramento, California

23
24 WILLIAM P. WOOD
25 California Corporations Commissioner

26 By: _____
27 WAYNE STRUMPFER
28 Acting Deputy Commissioner
Enforcement and Legal Services