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**STATE OF CALIFORNIA**  
**BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY**  
**DEPARTMENT OF BUSINESS OVERSIGHT**

TO: Guarantee Federal Title  
101 Park Avenue  
Oklahoma City, Oklahoma 73102

**DESIST AND REFRAIN ORDER**

**(For violations of Financial Code sections 17200 and 17403)**

The Commissioner of Business Oversight finds that:

1. From December 2016 to the present, Guarantee Federal Title, a business entity of unknown type, maintained a public website at [www.guaranteefederaltitle.com](http://www.guaranteefederaltitle.com). On its website, Guarantee Federal Title represented that its office was located at 101 Park Avenue, Oklahoma City, Oklahoma 73102.
2. On its website, Guarantee Federal Title advertised that it was in the escrow business. For example, it claimed that it was “one of the largest full service escrow companies worldwide” and was “a premier provider of escrow services.”
3. Guarantee Federal Title also claimed on its website that it was “fully licensed by the Department of Business Oversight.” Guarantee Federal Title has not been issued a license by the Commissioner under the Escrow Law (Fin. Code, § 17000 et seq.) and is not authorized to engage in business as an escrow agent in California. Guarantee Federal Title is not exempt from the licensing requirements of Financial Code section 17200.

Based on the foregoing, the Commissioner is of the opinion that Guarantee Federal Title has engaged in business as an escrow agent in California without obtaining a license in violation of Financial Code section 17200. The Commissioner is also of the opinion that Guarantee Federal Title has advertised that it is in the escrow business without being a licensed escrow agent in violation of Financial Code section 17403, subdivision (a).

Accordingly, under Financial Code section 17416, Guarantee Federal Title is ordered to desist and refrain from engaging in the business of receiving escrows for deposit or delivery without first

1 obtaining a license from the Commissioner or being exempt from the licensing requirement. Further,  
2 under Financial Code section 17403, subdivision (b), Guarantee Federal Title is ordered to desist and  
3 refrain from issuing, circulating, and publishing any advertisement by any means of communication  
4 containing any fictitious or corporate name or other words indicating that it is in the escrow business  
5 without first obtaining a license from the Commissioner.

6 This Order is necessary, in the public interest, for the protection of consumers, and consistent  
7 with the purposes, policies, and provisions of the Escrow Law. This Order shall remain in full force  
8 and effect until further order of the Commissioner.

9  
10 Dated: April 27, 2017  
11 Los Angeles, California

12 JAN LYNN OWEN  
13 Commissioner of Business Oversight

14 By \_\_\_\_\_  
15 MARY ANN SMITH  
16 Deputy Commissioner  
17 Enforcement Division  
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