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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
CONSUMER SERVICES DIVISION**

IN THE MATTER OF DETERMINING
Whether there has been a violation of the Escrow
Agent Registration Act of Washington by:

C-13-1172-13-TD01

THE ESCROW GROUP, LLC,
JACKLYNN LUDWICK, Member and Escrow
Officer,
ROBERT GARTH LUDWICK, Designated Escrow
Officer,
DAREN HAMILTON, Member and Escrow
Officer,

TEMPORARY ORDER TO
CEASE AND DESIST

Respondents.

13 THE STATE OF WASHINGTON TO: THE ESCROW GROUP, LLC
14 JACKLYNN LUDWICK
15 ROBERT GARTH LUDWICK
16 DAREN HAMILTON

17 COMES NOW the Director of the Washington State Department of Financial Institutions (Director), by
18 and through his designee Deborah Bortner, Division Director, Division of Consumer Services (designee), and
19 finding that the public interest will be irreparably harmed by delay in issuing an order to cease and desist, enters
20 this temporary order to cease and desist pursuant to chapter 18.44 RCW, the Escrow Agent Registration Act (Act),
21 based on the following findings:

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I. FACTUAL FINDINGS

1.1 Respondent.

A. The Escrow Group, LLC (Respondent Escrow Group) was licensed to conduct business as
an Escrow Agent (EA) for calendar year 2012, which expired on December 31, 2012, pursuant to RCW
18.44.151. Respondent Escrow Group failed to renew its EA license prior to the thirtieth day of January

1 following its expiration and the license was cancelled on or about January 31, 2013. The Department received
2 information that Respondent Escrow Group continues to engage in conducting the business of an escrow agent
3 to date.

4 **B. JackLynn Ludwick**, is known to be a member and Escrow Officer for Respondent Escrow
5 Group.

6 **C. Robert Garth Ludwick**, is known to be the Designated Escrow Officer for Respondent
7 Escrow Group.

8 **D. Daren Hamilton**, is known to be a member and Escrow Officer for Respondent Escrow
9 Group.

10 **1.2 Bond Cancellation.** On or about January 9, 2013, the Department received notification from
11 the issuer of the Respondent's fidelity bond that the bond had been cancelled as of November 19, 2012. To date
12 the Department has not received a replacement bond.

13 **II. GROUNDS FOR ENTRY OF ORDER**

14 **2.1 Requirement to Maintain a License.** Based on the Factual Allegations set forth in Section I
15 above, Respondents are in apparent violation of RCW 18.44.021 for engaging in the business of escrow agent
16 without being duly licensed by the Department.

17 **2.2 Requirement to Maintain Bond.** Based on the Factual Allegations set forth in Section I
18 above, Respondents are in apparent violation of RCW 18.44.201 for engaging in the business of an escrow
19 agent without maintaining the required bond.

20 **III. AUTHORITY TO ISSUE TEMPORARY ORDER TO CEASE AND DESIST**

21 **3.1 Authority to Issue Temporary Order to Cease and Desist.** Pursuant to RCW 18.44.440, the
22 Director is authorized to issue a temporary order to cease and desist whenever the Director makes a finding, in
23 writing, that the public interest will be irreparably harmed by delay in issuing a cease and desist order. Based
24 on the Factual Findings and Grounds for Entry of Order set forth above, it appears that Respondents are
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1 engaging in the business of an escrow agent without the proper license and without the proper bond. As a
2 result, the Director finds that the public interest will be irreparably harmed by delay in issuing an order to cease
3 and desist conducting business as an escrow agent.

4 IV. ORDER

5 Based on the above Factual Findings, Grounds for Entry of Order, and Authority to Issue Temporary
6 Order to Cease and Desist, and pursuant to RCW 18.44.440, the Director finds that the public interest will be
7 irreparably harmed by delay in issuing a cease and desist order. Therefore, the Director ORDERS that:

8 4.1 Respondent The Escrow Group, LLC, immediately cease and desist from conducting business
9 requiring an escrow agent license.

10 4.2 Respondents JackLynn Ludwick, Robert Garth Ludwick, and Daren Hamilton immediately cease
11 and desist from conducting any escrow agent business on behalf of The Escrow Group, LLC.

12 4.3 This order shall take effect immediately and shall remain in effect unless set aside, limited, or
13 suspended in writing by an authorized court.

14 NOTICE

15 PURSUANT TO CHAPTER 18.44 RCW, YOU ARE ENTITLED TO A HEARING WITHIN 14 DAYS
16 OF REQUEST TO DETERMINE WHETHER THIS ORDER SHALL BECOME PERMANENT. IF YOU
17 DESIRE A HEARING, THEN YOU MUST RETURN THE ACCOMPANYING APPLICATION FOR
18 ADJUDICATIVE HEARING, INCORPORATED HEREIN BY THIS REFERENCE. FAILURE TO
19 COMPLETE AND RETURN THE APPLICATION FOR ADJUDICATIVE HEARING FORM SO THAT IT IS
20 RECEIVED BY THE DEPARTMENT OF FINANCIAL INSTITUTIONS WITHIN 20 DAYS OF THE DATE
21 THAT THIS ORDER WAS SERVED ON YOU WILL CONSTITUTE A DEFAULT AND WILL RESULT IN
22 THE LOSS OF YOUR RIGHT TO A HEARING. SERVICE ON YOU IS DEFINED AS POSTING IN THE
23 U.S. MAIL, POSTAGE PREPAID, TO YOUR LAST KNOWN ADDRESS. BE ADVISED THAT DEFAULT

1 WILL RESULT IN THIS ORDER TO CEASE AND DESIST BECOMING PERMANENT ON THE 21ST DAY
2 FOLLOWING SERVICE OF THIS ORDER UPON YOU.

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4 WITHIN TEN DAYS AFTER YOU HAVE BEEN SERVED WITH THIS TEMPORARY ORDER
5 TO CEASE AND DESIST, YOU MAY APPLY TO THE SUPERIOR COURT IN THE COUNTY OF
6 YOUR PRINCIPAL PLACE OF BUSINESS FOR AN INJUNCTION SETTING ASIDE, LIMITING, OR
7 SUSPENDING THIS ORDER PENDING THE COMPLETION OF THE ADMINISTRATIVE
8 PROCEEDINGS PURSUANT TO THIS NOTICE.

9 DATED this 5th day of February, 2013.

10 [Redacted Signature]
11 DEBORAH BORTNER
12 Director
13 Division of Consumer Services
14 Department of Financial Institutions

14 Presented by:

15 [Redacted Signature]
16 GREGORY H. SANDOZ
17 Financial Legal Examiner

17 Approved by:

18 [Redacted Signature]
19 CHARLES E. CLARK
20 Enforcement Chief

