

**ORDER SUMMARY**  
**Consumer Services Division Case Number C-24-3876**

*Consent Orders resolve investigations. In these, companies and individuals work with us to agree to terms that resolve the issues in the investigation.*

<b>Name</b>	<b>Empire Escrow, Inc.</b>
<b>Order Number</b>	C-24-3876-24-CO01
<b>Date issued</b>	January 16, 2025

**What does this Consent Order require?**

- **All terms of this order are complete.**
- **Full cooperation**
- Must pay a fine of \$1,500
- Must pay an investigation fee of \$1,500

**Need more information?**

You can contact the Consumer Services Division, Enforcement unit at (360) 902-8703 or [cseforcecomplaints@dfi.wa.gov](mailto:cseforcecomplaints@dfi.wa.gov). *Please remember that we cannot provide financial or legal advice to members of the public. We also cannot release confidential information.*

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

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IN THE MATTER OF DETERMINING  
Whether there has been a violation of the Escrow  
Agent Registration Act of Washington by:  
EMPIRE ESCROW, INC.,  
Respondent.

No.: C-24-3876-24-CO01  
CONSENT ORDER

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COMES NOW the Director of the Department of Financial Institutions (Director), through his designee Ali Higgs, Division of Consumer Services Director, and Empire Escrow, Inc. (Respondent), and finding that the issues raised in the above-captioned matter may be economically and efficiently settled, agree to the entry of this Consent Order. This Consent Order is entered pursuant to Revised Code of Washington (RCW) 18.44, the Escrow Agent Registration Act (Act), and RCW 34.05, the Administrative Procedure Act, based on the following:

**FINDINGS OF FACT**

**1.1** On or about February 15, 2018, Respondent was approved for an escrow agent license in accordance with the Act from the Department of Financial Institutions of the State of Washington (Department) and continues to be licensed to date.

**1.2** On or about December 4, 2024, Respondent stated to the Department that it had been the victim of fraud, and that it wired substantial amounts of money from Respondent's trust account to the fraudulent party and a legitimate customer before a check from the fraudulent party was cashed. Respondent's actions created a deficit in Respondent's trust account. Respondent further stated that it did not have funds to deposit in the trust account to cover the deficit.

**1.3** On or about December 24, 2024, Respondent deposited funds into the trust account sufficient to cover the full amount of the deficit.

1 **CONCLUSIONS OF LAW**

2 **2.1** Based on the Factual Findings set forth in Section I above, Respondent violated RCW  
3 18.44.301(2) for directly or indirectly engaging in any unfair or deceptive practice toward any person.

4 **2.2** Based on the Factual Findings set forth in Section I above, Respondent violated RCW  
5 18.44.400(3) and WAC 208-680-410(10) for making disbursements on any escrow account without  
6 first receiving deposits directly relating to the account in amounts at least equal to the disbursements.

7 **AGREEMENT AND ORDER**

8 The Department and Respondent have agreed upon a basis for resolution of the Findings of  
9 Fact and Conclusions of Law identified in this Consent Order. Pursuant to RCW 18.44.413 and  
10 RCW 34.05.060, Respondent and the Department agree to entry of this Consent Order and further  
11 agree that the matters alleged herein may be economically and efficiently settled by the entry of this  
12 Consent Order. Respondent hereby admits the Findings of Fact and Conclusions of Law identified in  
13 this Consent Order.

14 Based upon the foregoing:

15 **A. Jurisdiction.** It is AGREED that the Department has jurisdiction over the subject matter of the  
16 activities discussed herein.

17 **B. Waiver of Hearing.** It is AGREED that Respondent hereby waives any right it has to a hearing  
18 and any and all administrative and judicial review of the issues raised in this matter or the resolution  
19 reached herein.

20 **C. Full Cooperation.** It is AGREED that Respondent shall provide full cooperation to the  
21 Department in the production of information and documents requested by the Department in  
22 connection with the Findings of Fact and Conclusions of Law above.  
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1 **D. Fine.** It is AGREED that Respondent shall pay a fine to the Department in the amount of  
2 \$1,500, upon delivery of this Consent Order, properly dated and signed.

3 **E. Investigation Fee.** It is AGREED that Respondent shall pay an investigation fee to the  
4 Department in the amount of \$1,500, upon delivery of this Consent Order, properly dated and signed.  
5 It is further AGREED that the Fine and Investigation Fee shall be paid together in one cashier's  
6 check in the amount of \$3,000, made payable to the "Washington State Treasurer."

7 **F. Non-Compliance with Order.** It is AGREED that Respondent understands that failure to  
8 abide by the terms and conditions of this Consent Order may result in further legal action by the  
9 Director. In the event of such legal action, Respondent may be responsible to reimburse the Director  
10 for the cost incurred in pursuing such action, including but not limited to, attorney fees.

11 **G. Voluntarily Entered.** It is AGREED that Respondent has voluntarily entered into this  
12 Consent Order, which is effective when signed by the Director's designee.

13 **H. Completely Read, Understood, and Agreed.** It is AGREED that Respondent has read this  
14 Consent Order in its entirety and fully understands and agrees to all of the same.

15 **I. Authority to Execute Order.** It is AGREED that the undersigned authorized representative  
16 has represented and warranted that they have the full power and right to execute this Consent Order  
17 on behalf of Respondent.

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1 **RESPONDENT:**

2 **Empire Escrow, Inc.**

3 By:

[Redacted signature]

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5 **TIMOTHY J. KIM**  
6 **President**

1/14/2025  
Date

7 **DO NOT WRITE BELOW THIS LINE**

8 THIS ORDER ENTERED THIS 16th DAY OF January, 2025.



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10 [Redacted signature]

11 **Ali Higgs, Director**  
12 **Division of Consumer Services**  
13 **Department of Financial Institutions**

14 Presented by:

[Redacted signature]

15 **KENNETH J. SUGIMOTO**  
16 **Financial Legal Examiner Supervisor**

17 Reviewed by:

[Redacted signature]

19 **DREW STILLMAN**  
20 **Financial Legal Examiner Supervisor**

21 Approved by:

[Redacted signature]

23 **JAMES R. BRUSSELBACK**  
24 **Acting Enforcement Chief**