

Consumer Services Division Case Number C-24-3879

Statements of Charges allege wrongdoing by a company or individual. DFI issues Statements of Charges to tell the company or individual:

- They have been investigated
- DFI is making allegations against them
- What the allegations are
- What consequences could follow

DFI informs the company or individual of their rights at this time. The company or individual can respond to the Charges. They also have the right to contest the Charges at an administrative hearing.

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|--------------------|---|
| Name(s) | WRIGHT ESCROW, INC RAYELL ANN WRIGHT |
| Number | C-24-3879-25-SC01 |
| Date issued | January 15, 2025 |

Questions?

You can contact the Consumer Services Division, Enforcement unit at (360) 902-8703 or 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.

1 STATE OF WASHINGTON
2 DEPARTMENT OF FINANCIAL INSTITUTIONS
3 DIVISION OF CONSUMER SERVICES

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

5 WRIGHT ESCROW, INC., and
6 RAYELL ANN WRIGHT,

7 Respondents.

No.: C-24-3879-25-SC01

STATEMENT OF CHARGES and
NOTICE OF INTENT TO ENTER AN
ORDER TO CEASE AND DESIST, TAKE
AFFIRMATIVE ACTION, REVOKE
LICENSES, PROHIBIT FROM INDUSTRY,
IMPOSE FINE, COLLECT INVESTIGATION
FEE, and MAINTAIN RECORDS

8 INTRODUCTION

9 Pursuant to RCW 18.44.410, the Director of the Department of Financial Institutions of the
10 State of Washington (Director) is responsible for the administration of chapter 18.44 RCW, the
11 Escrow Agent Registration Act (Act). After having conducted an investigation pursuant to RCW
12 18.44.420 and WAC 208-680-620, and based upon the facts available as of the date of this Statement
13 of Charges, the Director, through his designee, Consumer Services Division Director Ali Higgs,
14 institutes this proceeding and finds as follows:

15 I. FACTUAL ALLEGATIONS

16 1.1 Respondents.

17 A. **Wright Escrow, Inc.** The Washington State Department of Financial Institutions
18 (Department) licensed Wright Escrow, Inc. (Respondent Wright) to conduct business as an escrow
19 agent on or about January 18, 2022, and Respondent Wright continues to be licensed to date.

20 B. **Rayell Ann Wright.** The Department licensed Rayell Ann Wright (Respondent
21 Rayell) to conduct business as an escrow officer on or about September 6, 2017, and Respondent
22 Rayell continues to be licensed to date.

23 1.2 **Did not Comply with Director's Authority.** On or about October 24, 2024, the Department
24 sent at least two directives that required Respondents to file written statements and provide

1 documents and books and records to be sent to the Department. The Department did not receive a
2 response from Respondents and on or about November 18, 2024, sent at least two more letters to
3 Respondents requesting the written statements, documents, and books and records. As of the date of
4 this Statement of Charges, the Department has not received a response from Respondents.

5 **1.3 On-Going Investigation.** The Department’s investigation into the alleged violations of the
6 Act by Respondents continues to date.

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

8 **2.1 Definition of Escrow.** Pursuant to RCW 18.44.011(7), “Escrow” means any transaction
9 wherein any person or persons, for the purpose of effecting and closing the sale, purchase, exchange,
10 transfer, encumbrance, or lease of real or personal property to another person or persons, delivers any
11 written instrument, money, evidence of title to real or personal property, or other thing of value to a
12 third person to be held by such third person until the happening of a specified event or the
13 performance of a prescribed condition or conditions, when it is then to be delivered by such third
14 person, in compliance with instructions under which he or she is to act, to a grantee, grantor,
15 promisee, promisor, obligee, obligor, lessee, lessor, bailee, bailor, or any agent or employee thereof.

16 **2.2 Definition of Escrow Agent.** Pursuant to RCW 18.44.011(8), “Escrow Agent” means any
17 person engaged in the business of performing for compensation the duties of the third person referred
18 to in RCW 18.44.011(7).

19 **2.3 Requirement to Comply with Director’s Authority.** Based on Factual Allegations set forth
20 in Section 1.2 above, Respondents are in apparent violation of RCW 18.44.400(1) and RCW
21 18.44.420 by failing to provide documents and other materials required by the Director.

22 **III. AUTHORITY TO IMPOSE SANCTIONS**

23 **3.1 Authority to Issue an Order to Cease and Desist and Take Affirmative Action.** Pursuant
24 to RCW 18.44.440(1) and (3) and WAC 208-680-630, if the Director determines after notice and

1 hearing that a person has violated any provision of the Act, the Director may issue an order requiring
2 the person to cease and desist from the unlawful practice and to take such affirmative action as in the
3 judgment of the Director will carry out the purposes of the Act.

4 **3.2 Authority to Revoke Licenses.** Pursuant to RCW 18.44.430, the Director may revoke the
5 license of any escrow agent or escrow officer if the Director finds that the applicant or any partner,
6 officer, director, controlling person, or employee has committed any of the following acts or engaged
7 in (b) violating any provisions of the Act; (f) failing, upon demand, to disclose any information
8 within his or her knowledge to, or to produce any document, book, or record in his or her possession
9 for inspection of, the director or his or her authorized representatives; or (i) committing acts or
10 engaging in conduct that demonstrates the applicant or licensee to be incompetent or untrustworthy,
11 or a source of injury and loss to the public.

12 **3.3 Authority to Prohibit from Industry.** Pursuant to RCW 18.44.430(3) and WAC 208-680-
13 640(1)(b), the Director may prohibit from participation in the conduct of the affairs of any licensed
14 escrow agent, any officer, controlling person, director, employee, or licensed escrow officer.

15 **3.4 Authority to Impose Fine.** Pursuant to RCW 18.44.430(3) and WAC 208-680-640(1)(d), the
16 Director may impose a fine up to \$100 per day for each violation of this Act.

17 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 18.44.121, RCW 18.44.410,
18 WAC 208-680-620, and WAC 208-680-650, every licensee investigated by the Director shall pay for
19 the cost of the investigation, calculated at the rate of \$62.50 per hour devoted to the investigation.

20 **3.6 Requirement to Maintain Records.** Pursuant to RCW 18.44.400(1), every licensed escrow
21 agent shall keep adequate records, as determined by rule by the director, of all transactions handled
22 by or through the agent including itemization of all receipts and disbursements of each transaction.

23 These records shall be maintained in this state, unless otherwise approved by the director, for a period
24 of six years from completion of the transaction.

1 **IV. NOTICE OF INTENT TO ENTER ORDER**

2 Respondents' violations of the provisions of chapter 18.44 RCW and chapter 208-680 WAC,
3 as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose
4 Sanctions, constitute a basis for the entry of an Order under RCW 18.44.400, RCW 18.44.410, RCW
5 18.44.430, RCW 18.44.440, and WAC 208-680-630. Therefore, it is the Director's intent to ORDER
6 that:

7 **4.1** Respondent Wright Escrow, Inc. cease and desist from engaging in the business of an
8 escrow agent.

9 **4.2** Respondent Rayell Ann Wright cease and desist from engaging in the business of an
10 escrow officer.

11 **4.3** Respondents Wright Escrow, Inc. and Rayell Ann Wright take the affirmative action
12 of responding to the Department's directives referenced in Section 1.2 above.

13 **4.4** Respondent Wright Escrow, Inc.'s license to conduct the business of an escrow agent
14 be revoked.

15 **4.5** Respondent Rayell Ann Wright's license to conduct the business of an escrow officer
16 be revoked.

17 **4.6** Respondents Wright Escrow, Inc. and Rayell Ann Wright be prohibited from the
18 participation in the conduct of the affairs of any escrow agent subject to licensure by
19 the Director, in any manner, for a period of five years.

20 **4.7** Respondents Wright Escrow, Inc. and Rayell Ann Wright jointly and severally pay a
21 fine that as of the date of this Statement of Charges totals \$9,300.00.

22 **4.8** Respondents Wright Escrow, Inc. and Rayell Ann Wright jointly and severally pay an
23 investigation fee that as of the date of this Statement of Charges totals \$240.62.

24 **4.9** Respondents Wright Escrow, Inc. and Rayell Ann Wright, its officers, employees, and
agents maintain all records involving Washington State escrow transactions within the
state of Washington for a period of six years from completion of the escrow
transactions.

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1 **V. AUTHORITY AND PROCEDURE**

2 This Statement of Charges and Notice of Intent to Enter an Order to Cease and Desist, Take
3 Affirmative Action, Revoke Licenses, Prohibit from Industry, Impose Fine, Collect Investigation Fee,
4 and Maintain Records (Statement of Charges) is entered pursuant to the provisions of RCW
5 18.44.410, RCW 18.44.430, and RCW 18.44.440, and is subject to the provisions of chapter 34.05
6 RCW (the Administrative Procedure Act). Respondents may make a written request for a hearing as
7 set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING
8 accompanying this Statement of Charges.

9
10 Dated this 15th day of January, 2025.



11 [Redacted Signature]
12 _____
13 ALI HIGGS, Director
14 Division of Consumer Services
15 Department of Financial Institutions

16 Presented by:

17 [Redacted Signature]

18 _____
19 MEGAN GUTHRIE
20 Financial Legal Examiner

21 Reviewed by:

22 [Redacted Signature]

23 _____
24 DREW STILLMAN
Financial Legal Examiner Supervisor

Approved by:

[Redacted Signature]

_____ JAMES R. BRUSSELBACK
Acting Enforcement Chief