

ORDER SUMMARY
Consumer Services Division Case Number C-25-3908

Temporary Orders to Cease and Desist require individuals or companies to temporarily stop doing things, usually things that could harm or have harmed consumers. The individual or company has the right to contest the Order at an administrative hearing. If the individual or company does not contest the temporary order, it will become permanent when DFI issues a Final Order.

Name	EscrowLink LTD
Order Number	C-25-3908-25-TD01
Date issued	2/3/2025

What does this Temporary Order to Cease and Desist require?

- Immediately deposit funds into the trust account sufficient to cover the full amount of the deficit.
- Disburse funds to pay off one consumer's mortgage and reimburse additional mortgage payments made
- Immediately cease and desist from accepting any new business from customers.
- Continue to process escrow transactions for existing customers only and ensure that existing customers are not harmed as a result of the deficit in the trust account.

Need more information?

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.

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

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

ESCROWLINK LTD,

Respondent.

No. C-25-3908-25-TD01

TEMPORARY ORDER TO
CEASE AND DESIST

THE STATE OF WASHINGTON TO: ESCROWLINK, LTD

COMES NOW the Director of the Washington State Department of Financial Institutions,
by and through his designee Ali Higgs, Division of Consumer Services Director, and finding that
the public interest will be irreparably harmed by delay in issuing a cease and desist order, enters this
Temporary Order to Cease and Desist pursuant to chapter 18.44 RCW, the Escrow Agent
Registration Act (Act), based on the following findings:

I. FACTUAL FINDINGS

1.1 Respondent. EscrowLink LTD (Respondent) was licensed by the Department
of Financial Institutions of the State of Washington (Department) to conduct business as an
escrow agent on or about January 18, 2001, and continues to be licensed to date.

1.2 Fraud and Deficit in Trust Account. On or about January 31, 2025 Respondent
represented to the Department that in or around August 2024 Respondent unknowingly wired
substantial amounts of money from Respondent’s trust account to a fraudulent party.
Respondent further stated that Respondent in or around September 2024 discovered the
fraudulent activity and that Respondent did not have funds to deposit in the trust account to cover
the deficit and to pay off a seller’s mortgage as required by the escrow instructions for a

1 transaction. As of the date of this Temporary Order to Cease and Desist, Respondent is
2 operating with a substantial deficit in its trust account.

3 **1.3 Substantial Injury to Public.** An escrow agent operating with a deficit in its
4 trust account poses a substantial risk to its customers that it will not be able to make required
5 disbursements to them. The effect of the above-described conduct is that the public interest will
6 be irreparably harmed by delay in issuing an order to cease and desist.

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

8 **2.1 Prohibited Practices.** Based on the Factual Findings set forth in Section I
9 above, Respondent is in violation of RCW 18.44.301(2) for directly or indirectly engaging in
10 any unfair or deceptive practice toward any person.

11 **2.2 Disbursements of Funds to Fraudulent Party.** Based on the Factual Findings
12 set forth in Section I above, Respondent is in violation of RCW 18.44.430(1)(e) and WAC
13 208-680-560(1) for failing to disburse funds as set forth in the escrow instructions.

14 **III. AUTHORITY TO ISSUE OF ORDER**

15 **3.1** Pursuant to RCW 18.44.440, if the Director makes a finding of fact in writing
16 that the public interest will be irreparably harmed by delay in issuing an order to cease and
17 desist, the Director may issue a temporary cease and desist order and require the person to
18 cease and desist from unlawful practices and to take such affirmative action as in the judgment
19 of the Director will carry out the purposes of the Act.

20 **IV. ORDER**

21 Based on the above Factual Findings, Grounds for Entry of Order, and Authority to Issue
22 Temporary Order to Cease and Desist, and pursuant to RCW 18.44.410, the Director determines
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1 that the public interest will be irreparably harmed by a delay in entering a cease and desist order.
2 Therefore, the Director ORDERS that:

3 **4.1** Respondent EscrowLink LTD shall immediately deposit funds into the trust
4 account sufficient to cover the full amount of the deficit identified in Section 1.2, including
5 amounts sufficient to pay off the seller's current outstanding mortgage balance and funds
6 sufficient to reimburse the seller for all additional mortgage payments made by the seller since
7 August 1, 2024.
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9 **4.2** Respondent EscrowLink, LTD shall disburse funds pursuant to the escrow
10 instructions to pay off the seller's current outstanding mortgage balance and shall disburse funds
11 to the seller to reimburse for additional mortgage payments made since August 1, 2024.

12 **4.3** Respondent EscrowLink, LTD shall immediately cease and desist from accepting
13 any new business from customers.

14 **4.4** Respondent EscrowLink, LTD shall continue to process escrow transactions for
15 existing customers only and ensure that existing customers are not harmed as a result of the
16 deficit in the trust account identified in Section 1.2.

17 **4.5** This order shall take effect immediately and shall remain in effect unless set
18 aside, limited, or suspended in writing by an authorized court.
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20 **NOTICE**

21 PURSUANT TO CHAPTER 18.44 RCW, RESPONDENT IS ENTITLED TO A
22 HEARING TO DETERMINE WHETHER THIS ORDER SHALL BECOME PERMANENT.
23 IF RESPONDENT DESIRES A HEARING, RESPONDENT MUST RETURN THE
24 ATTACHED APPLICATION FOR ADJUDICATIVE HEARING.
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1 FAILURE TO COMPLETE AND RETURN THE APPLICATION FOR
2 ADJUDICATIVE HEARING SO THAT IT IS RECEIVED BY THE DEPARTMENT OF
3 FINANCIAL INSTITUTIONS WITHIN TWENTY (20) DAYS OF THE DATE THIS ORDER
4 WAS SERVED ON RESPONDENT WILL CONSTITUTE A DEFAULT AND WILL RESULT
5 IN THE LOSS OF RESPONDENT'S RIGHT TO A HEARING.

6 SERVICE ON RESPONDENT IS DEFINED AS POSTING IN THE U.S. MAIL,
7 POSTAGE PREPAID, TO RESPONDENT'S LAST KNOWN ADDRESS, OR PERSONAL
8 SERVICE. DEFAULT WILL RESULT IN THIS TEMPORARY ORDER TO CEASE AND
9 DESIST BECOMING PERMANENT ON THE TWENTY-FIRST (21ST) DAY FOLLOWING
10 SERVICE OF THIS ORDER.
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13 Entered this 3rd day of February, 2025.



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16 ALI HIGGS, Director
17 Division of Consumer Services
18 Department of Financial Institutions

19 Presented by:

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21 KENDALL FREED
22 Financial Legal Examiner Supervisor

23 Reviewed by:

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25 JAMES R. BRUSSELBACK
Acting Enforcement Chief