Consumer Services Division Case Number C-25-3983

Final Orders *resolve investigations where companies or individuals have been charged and then the Department has imposed sanctions.*

Once DFI serves the Final Order on the individual or company, the company or individual has 10 days to petition (formally ask) the Director of DFI to reconsider. The company or individual can appeal in superior court.

Names	**Surrogacy Escrow Account Management LLC d/b/a SEAM LLC** **Dominique Side**
Number	C-25-3983-25-FO01
Date issued	November 25, 2025

What does this Final Order require?

- Must pay a fine of $217,900.00.
- Must pay an investigation fee of $1,856.25. (Investigation fees cover the cost of DFI staff time working on the investigation.)
- Respondents must cease and desist performing escrow services in the state of Washington until they obtain a license to provide escrow services in the state of Washington or meet an exclusion from licensing.
- Must pay restitution of a minimum of $171,020.98 to 2 members of the public.
- Respondents Dominique Side isn't allowed to participate in escrow services in Washington until November 25, 2035.

Questions?

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

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: SURROGACY ESCROW ACCOUNT MANAGEMENT, LLC d/b/a SEAM, LLC, and DOMINIQUE SIDE, Respondents.	No.: C-25-3983-25-FO01 FINAL ORDER

I. DIRECTOR'S CONSIDERATION

A. Default. This matter has come before the Director of the Department of Financial Institutions of the State of Washington (Director), through his designee, Consumer Services Division Director Ali Higgs (Director's designee), pursuant to RCW 34.05.440(1). On September 25, 2025, the Director, through the Director's designee, issued a Statement of Charges and Notice of Intent to Enter an Order to Cease and Desist, Prohibit from Industry, Order Restitution, Impose Fine, Collect Investigation Fee, and Maintain Records (Statement of Charges) against Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC and Dominique Side (Respondents). A copy of the Statement of Charges is attached and incorporated into this order by this reference. The Statement of Charges was accompanied by a cover letter dated September 26, 2025, a Notice of Opportunity to Defend and Opportunity for Hearing, and a blank Application for Adjudicative Hearing for each Respondent (collectively, accompanying documents).

On September 25, 2025, the Department served Respondents with the Statement of Charges and accompanying documents by First-Class mail and Federal Express overnight delivery. On September 29, 2025, the documents sent by Federal Express overnight delivery were delivered. The

documents sent by First-Class mail were not returned to the Department by the United States Postal Service.

Respondents did not request an adjudicative hearing within twenty calendar days after the Department served the Notice of Opportunity to Defend and Opportunity for Hearing, as provided for in WAC 208-08-050(2).

B. Record Presented. The record presented to the Director's designee for his review and for entry of a final decision included the following:

1. Statement of Charges, cover letter dated September 26, 2025, Notices of Opportunity to Defend and Opportunity for Hearing, and blank Applications for Adjudicative Hearing for Respondents, with documentation for service.

C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(1), the Director's designee hereby adopts the Statement of Charges, which is attached hereto.

II. FINAL ORDER

Based upon the foregoing, and the Director's designee having considered the record and being otherwise fully advised, NOW, THEREFORE:

A. IT IS HEREBY ORDERED, That:

1. Respondent Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC cease and desist from performing escrow services in the state of Washington until such time as Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC obtains a license from the Department to provide escrow services in the state of Washington or meets an exclusion from licensing as delineated in the Act.

2. Respondent Dominique Side cease and desist from performing escrow services in the state of Washington until such time as Dominique Side obtains a license from the Department to provide escrow services in the state of Washington or meets an exclusion from licensing as delineated in the Act.

3. Respondent Dominique Side is prohibited from participation in the conduct of the affairs of any escrow company subject to licensure by the director, in any manner, for a period of ten (10) years.

4. Respondents Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC and Dominique Side refund all funds received from Washington consumers and

refund all fees paid by all consumer related to Respondents' escrow activities in the state of Washington.

5. Respondents Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC and Dominique Side jointly and severally pay a fine of $217,900.

6. Respondents Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC and Dominique Side jointly and severally pay an investigation fee of $1,856.25.

7. Respondent Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC, 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.

B. Reconsideration. Pursuant to RCW 34.05.470, Respondents have the right to file a Petition for Reconsideration stating the specific grounds upon which relief is requested. The Petition must be filed in the Office of the Director of the Department of Financial Institutions by courier at 150 Israel Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200, Olympia, Washington 98504-1200, within ten (10) days of service of the Final Order upon Respondents. The Petition for Reconsideration shall not stay the effectiveness of this order nor is a Petition for Reconsideration a prerequisite for seeking judicial review in this matter.

A timely Petition for Reconsideration is deemed denied if, within twenty (20) days from the date the petition is filed, the agency does not (a) dispose of the petition or (b) serve the parties with a written notice specifying the date by which it will act on a petition.

C. Stay of Order. The Director's designee has determined not to consider a Petition to Stay the effectiveness of this order. Any such requests should be made in connection with a Petition for Judicial Review made under chapter 34.05 RCW and RCW 34.05.550.

D. Judicial Review. Respondents have the right to petition the superior court for judicial review of this agency action under the provisions of chapter 34.05 RCW. For the requirements for filing a Petition for Judicial Review, see RCW 34.05.510 and sections following.

E. Non-compliance with Order. If you do not comply with the terms of this order, **including payment of any amounts owed within 30 days of receipt of this order,** the Department may seek its enforcement by the Office of the Attorney General to include the collection of the fines, fees, and restitution imposed herein. The Department also may assign the amounts owed to a collection agency for collection.

F. Service. For purposes of filing a Petition for Reconsideration or a Petition for Judicial Review, service is effective upon deposit of this order in the U.S. mail, declaration of service attached hereto.

DATED this 25th day of November, 2025.

STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS

[redacted]
Ali Higgs, Director
Division of Consumer Services

Consumer Services Division Case Number C-25-3983

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.

Names	**Surrogacy Escrow Account Management LLC d/b/a SEAM LLC** **Dominique Side**
Number	C-25-3983-25-SC01
Date issued	September 25, 2025

Questions?

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

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: SURROGACY ESCROW ACCOUNT MANAGEMENT, LLC d/b/a SEAM, LLC, and DOMINIQUE SIDE, Respondents.	No.: C-25-3983-25-SC01 STATEMENT OF CHARGES and NOTICE OF INTENT TO ENTER AN ORDER TO CEASE AND DESIST, PROHIBIT FROM INDUSTRY, ORDER RESTITUTION, IMPOSE FINE, COLLECT INVESTIGATION FEE, AND MAINTAIN RECORDS

INTRODUCTION

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

I. FACTUAL ALLEGATIONS

1.1 Respondents.

a. Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC (SEAM) has never been licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as an escrow agent.

b. Dominique Side, is the owner of SEAM and has never been licensed by the Department to conduct business under the Act.

1.2 Unlicensed Activity. In 2023 and 2024, Respondents performed escrow functions in at least

two (2) transactions related to Washington consumers.

1.3 Failed to Fulfill Escrow Obligations. In 2023 and 2024, Respondents failed to complete the escrow transactions as obligated pursuant to the agreement entered with at least two (2) Washington consumers. In those two escrow transactions, the two Washington consumers deposited funds of at least $171,020.98 into escrow with Respondents to pay surrogates. Respondents failed to distribute funds collected to the surrogates and did not refund the funds collected to the two Washington consumers.

1.4 Failed to Respond. On or about March 20, 2025, the Department issued a Subpoena to Provide Documents and Explanation to Respondents with a response deadline of April 4, 2025. To date, the Department has not received a response from Respondents.

1.5 On-Going Investigation. The Department's investigation into the alleged violations of the Act by Respondents continues to date.

II. GROUNDS FOR ENTRY OF ORDER

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

2.2 Definition of Escrow Agent. Pursuant to RCW 18.44.011(8) "Escrow Agent" means any person engaged in the business of performing for compensation the duties of the third person referred to in RCW 18.44.011(7).

2.3 Requirement to Obtain and Maintain License. Based on Factual Allegations set forth in Sections 1.1 through 1.3 above, Respondents are in apparent violation of RCW 18.44.021 for engaging in the business of an escrow agent by performing escrows or any of the functions of an escrow agent within the state of Washington without first obtaining a license.

2.4 Prohibited Practices. Based on the Factual Allegations set forth in Section 1.3 above, Respondents are in apparent violation of RCW 18.44.301(1) & (2), and WAC 208-680-560(1) for failing to disburse the funds as agreed and directly or indirectly employing any scheme, device, or artifice to defraud or mislead any person, and for engaging in any unfair and deceptive practice toward any person.

2.5 Requirement to Respond to the Department. Based on the Factual Allegations set forth in Section 1.4 above, Respondents are in apparent violation of RCW 18.44.301(10) and WAC 208-680-590(10) for failing to make any report or statement lawfully required by the director.

III. AUTHORITY TO IMPOSE SANCTIONS

3.1 Authority to Issue an Order to Cease and Desist. Pursuant to RCW 18.44.440 and WAC 208-680-630, if the Director determines after notice and hearing that a person has: violated any provision of the Act; or engaged in any false, unfair and deceptive, or misleading advertising or promotional activity or business practices; the director may issue an order requiring the person to cease and desist from the unlawful practice and to take such affirmative action as in the judgment of the director will carry out the purposes of the Act.

3.2 Authority to Prohibit from Industry. Pursuant RCW 18.44.430(3), WAC 208-680-630, and WAC 208-680-640, the director may prohibit any officer, controlling person, director, employee, or licensed escrow officer, or any person subject to licensing under the Act from participating in the conduct of the affairs of any licensed escrow agent.

3.3 Authority to Order Restitution. Pursuant to RCW 18.44.430(4), WAC 208-680-630, and

WAC 208-680-640, the director may order an escrow agent, officer, controlling person, director, employee, or licensed escrow officer to pay restitution to an injured party.

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

3.5 Authority to Collect Investigation Fee. Pursuant to RCW 18.44.410, WAC 208-680-620, and WAC 208-680-650, every person examined or investigated by the Director shall pay for the cost of the examination or investigation, calculated at the rate of $62.50 per hour devoted to the examination or investigation.

IV. NOTICE OF INTENT TO ENTER ORDER

Respondents' violations of the provisions of chapter 18.44 RCW as set forth in the above Factual Allegations and Grounds for Entry of Order constitute a basis for the entry of an Order under RCW 18.44.410, RCW 18.44.430, and RCW 18.44.440, which authorize the Director to enforce all laws, rules, and regulations related to the registration of escrow agents and licensing of escrow officers. Therefore, it is the Director's intent to ORDER that:

4.1 Respondent Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC cease and desist from performing escrow services in the state of Washington until such time as Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC obtains a license from the Department to provide escrow services in the state of Washington or meets an exclusion from licensing as delineated in the Act.

4.2 Respondent Dominique Side cease and desist from performing escrow services in the state of Washington until such time as Dominique Side obtains a license from the Department to provide escrow services in the state of Washington or meets an exclusion from licensing as delineated in the Act.

4.3 Respondent Dominique Side be prohibited from participation in the conduct of the affairs of any escrow company subject to licensure by the director, in any manner, for a period of 10 years.

4.4 Respondents Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC and Dominique Side refund all funds received from Washington consumers and fund all fees paid by all consumer related to Respondents' escrow activities in the state of Washington.

4.5 Respondents Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC and Dominique Side jointly and severally pay a fine. As of the date of this Statement of Charges, the fine totals $217,900.

4.6 Respondents Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC and Dominique Side jointly and severally pay an investigation fee. As of the date of this Statement of Charges, the investigation fee totals $1,856.25.

4.7 Respondent Surrogacy Escrow Account Management, LLC d/b/a SEAM, LLC, 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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V. AUTHORITY AND PROCEDURE

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

Dated this 25th day of September, 2025.

[redacted]
ALI HIGGS, Director
Division of Consumer Services
Department of Financial Institutions

Presented by:

[redacted]
SANDRA MÉNDEZ
Financial Legal Examiner

Approved by:

[redacted]
KENDALL FREED
Enforcement Chief