

1 4. Respondent has not maintained a trust account check register that chronologically lists all
2 deposits and disbursements in the account. Respondent has not, on a monthly basis, reconciled the
3 trust account check register to the trust account bank statement. Respondent also has not maintained
4 client ledgers that clearly summarize all receipts and disbursements for each client.

5 III. Unlicensed Escrow Agent

6 5. Neither Doohan nor Escrow Integrity are or have ever been licensed with the Department
7 of Financial Institutions as an escrow agent, escrow officer, or designated escrow officer.

8 Based upon the above Findings of Fact, the following Conclusions of Law are made:

9 **CONCLUSIONS OF LAW**

10 1. The conduct described in the Findings of Fact constitutes an escrow transaction under RCW
11 18.44.011.

12 2. The conduct described in the Findings of Fact is in violation of RCW 18.44.021 because
13 Escrow Integrity and/or Doohan have engaged in business as, and performed functions of, an
14 escrow agent in the State of Washington or with respect to transactions involving property in
15 Washington without a valid license issued by the director of the Department of Financial
16 Institutions.

17 3. The conduct described in the Findings of Fact is in violation of RCW 18.44.071 because
18 Escrow Integrity and/or Doohan have not ensured that a licensed escrow officer has supervised all
19 escrow transactions.

20 4. The conduct described in the Findings of Fact is in violation of RCW 18.44.071 because
21 there has been no designated escrow officer at Escrow Integrity responsible for handling its escrow
22 transactions, managing its trust account, and supervising all other licensed escrow officers it
23 employs.

1 IT IS FURTHER AGREED AND ORDERED that Escrow Integrity and Kristin Doohan shall
2 reimburse the Securities Division \$1,500 for its costs incurred in investigating this matter, of which
3 \$1,000 is suspended based on future compliance with this Order and based on Doohan's
4 supplemental filings with the Division demonstrating an inability to pay. The remaining \$500
5 payment is to be made to the Securities Division prior to the entry of this Order. In the event this
6 Order is violated, the Securities Division will seek enforcement of the Order pursuant to RCW
7 18.44.490 and/or other provisions of the Escrow Agent Registration Act.

8 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent
9 Order.

10 IT IS FURTHER AGREED that in consideration of the foregoing Escrow Integrity and
11 Kristin Doohan each waive their right to a hearing on this matter and to judicial review of this
12 Order.


13 SIGNED this 16th day of March, 2004

14 Signed by:

15 Kristin Doohan
16 Kristin Doohan, individually


Kristin Doohan
Kristin Doohan, owner
Escrow Integrity


17
18 THIS ORDER ENTERED THIS 24th DAY OF March, 2004 BY:

19 
20 DEBORAH R. BORTNER
Assistant Director, DFI

21 Approved by:

Presented by:

22 
23 Michael E. Stevenson
24 Michael E. Stevenson
Chief of Enforcement


25 Andrew Ledbetter
Andrew Ledbetter
Financial Legal Examiner

CONSENT ORDER

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CONSENT ORDER