

STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
SECURITIES DIVISION

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

Insure-Trades.com, Mohammad Younis,  
Respondents.

Case Number S-04-047-04-TO01

STATEMENT OF CHARGES,  
TEMPORARY ORDER TO CEASE AND  
DESIST, AND NOTICE OF INTENT TO  
IMPOSE FINES AND COLLECT COSTS

**STATEMENT OF CHARGES**

Please take notice that the Department of Financial Institutions of the State of Washington (“Department”) has reason to believe that the Respondents, Insure-Trades.com and Mohammad Younis, have each violated the Escrow Agent Registration Act and that their violations justify the Department in entering an order under RCW 18.44.440 that they each cease and desist from such violations. The Department finds that delay in entering this order would result in irreparable harm to the public interest and that a Temporary Order to Cease and Desist should be entered immediately. The Department also has reason to believe that grounds exist for imposing fines against and collecting costs from Insure-Trades.com and Mohammad Younis.

The Department finds as follows:

**TENTATIVE FINDINGS OF FACT**

**RESPONDENTS**

1. Insure-Trades.com claims to provide online escrow services with an office located in Blacksburg, Virginia.

1 2. Mohammad Younis owns the Insure-Trades.com website and is the administrative and  
2 technical contact for it.

3 3. Insure-Trades.com has a website, viewable to Washington residents, that holds out that it  
4 will do business in Washington State.

5 MISREPRESENTATIONS AND OMISSIONS

6 4. Insure-Trades.com and/or Mohammad Younis have maintained a website that claims to  
7 provide a “safe” means of transacting business and making certain payments over the Internet.  
8 Specifically, Insure-Trades.com and/or Mohammad Younis have claimed to be a “trusted third  
9 party that holds payment until a transaction is complete.” Insure-Trades.com and/or Mohammad  
10 Younis claimed this ability in the context of business-to-business transactions, website domain  
11 name registrations, online vehicle purchases, and other web-based transactions.

12 5. Insure-Trades.com and/or Mohammad Younis have claimed to have certain business  
13 partnerships, affiliations, and investors that they do not and never have possessed. For instance,  
14 the website has claimed the business is “backed by” Fidelity National Financial Inc., although it  
15 has never had this relationship. The website has also claimed to be an affiliate of Internet  
16 Escrow Services Inc., a California corporation principally located in Irvine, California, with its  
17 own website at [www.escrow.com](http://www.escrow.com). Internet Escrow Services Inc. has denied having any  
18 relationship with Insure-Trades.com, which it claims has pirated their website.

19 6. Insure-Trades.com and/or Mohammad Younis have claimed to be licensed by several  
20 states, including license #963-1867 from the California Department of Corporations and license  
21 # 602-000-829 from the Washington State Department of Financial Institutions. Insure-  
22 Trades.com does not carry either of these California or Washington licenses. In fact, # 602-000-  
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1 829 is not a Washington escrow license number; it is the Uniform Business Index for Internet  
2 Escrow Services Inc.

3 LICENSING STATUS

4 7. Insure-Trades.com and Mohammad Younis are not and never have been licensed with  
5 Washington State Department of Financial Institutions as escrow agents or officers.  
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7 EMERGENCY AND PUBLIC INTEREST

8 8. Based on the above Tentative Findings of Fact, the Department finds that delay in issuing  
9 an order will irreparably harm the public interest.

10 CONCLUSIONS OF LAW

11 1. Insure-Trades.com and/or Mohammad Younis constitute an “escrow agent” as defined in  
12 RCW 18.44.011.

13 2. The conduct described in the Tentative Findings of Fact is in violation of RCW  
14 18.44.301(1) because Insure-Trades.com, Mohammad Younis, and/or their employees and agents  
15 have employed a scheme, device, or artifice to defraud or mislead borrowers, lenders, or other  
16 persons by claiming business affiliations and state licenses they do not have.  
17

18 3. The conduct described in the Tentative Findings of Fact is in violation of RCW  
19 18.44.301(2) because Insure-Trades.com, Mohammad Younis, and/or their employees and agents  
20 have engaged in an unfair or deceptive practice toward a person by claiming business affiliations  
21 and state licenses they do not have.

22 4. The conduct described in the Tentative Findings of Fact is in violation of RCW  
23 18.44.301(4) because, in claiming business affiliations and state licenses it does not have, Insure-  
24 Trades.com, Mohammad Younis, and/or their employees or agents have knowingly made,  
25

1 published, or disseminated false, deceptive, or misleading information in the conduct of escrow  
2 business, relating to escrow business, or relating to persons engaged in escrow business.

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4 **TEMPORARY ORDER TO CEASE AND DESIST**

5 Based upon the foregoing:

6  
7 NOW, THEREFORE, IT IS HEREBY ORDERED that Insure-Trades.com, Mohammad  
8 Younis, and their employees and agents each cease and desist from violating RCW 18.44.301(1),  
9 which prohibits schemes to defraud any person.

10 It is further ORDERED that Insure-Trades.com, Mohammad Younis, and their  
11 employees and agents each cease and desist from violating RCW 18.44.301(2), which prohibits  
12 unfair or deceptive practices toward any person.

13 It is further ORDERED that Insure-Trades.com, Mohammad Younis, and their  
14 employees and agents each cease and desist from violating RCW 18.44.301(4), which prohibits  
15 making, publishing, or distributing false, deceptive, or misleading escrow information.  
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18 **CONTINUING INVESTIGATION**

19 The Department is continuing to investigate the practices of the Respondents and their  
20 principals, employees, and agents to determine the full extent of the violations of the Escrow  
21 Agent Registration Act that have occurred in this matter.  
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23  
24 **NOTICE OF INTENT TO IMPOSE FINES AND COLLECT COSTS**

25 Pursuant to RCW 18.44.440, and based on the above Tentative Findings of Fact and  
26 Conclusions of Law, the Department intends to ORDER that Insure-Trades.com and Mohammad  
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1 Younis shall be jointly liable for and shall (1) pay the Department a fine in the amount of \$9,000;  
2 and (2) reimburse the Department \$500 for the costs of investigating this matter.  
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4 **AUTHORITY AND PROCEDURE**

5 This Order is entered pursuant to the provisions of RCW 18.44.301 and RCW 18.44.440  
6 and is subject to the provisions of chapter 34.05 RCW. The respondents may make a written  
7 request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND  
8 OPPORTUNITY FOR HEARING accompanying this order.  
9

10 If a respondent does not request a hearing, the Department intends to adopt the above  
11 Tentative Findings of Fact and Conclusions of Law as final, to make the temporary order to  
12 cease and desist permanent, and to impose a \$9,000 fine against and to collect \$500 in costs from  
13 that respondent.  
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15 DATED this 8<sup>th</sup> day of April, 2004.  
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19 Deborah R. Bortner  
20 Assistant Director  
21 Department of Financial Institutions

22 Approved by:

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24 Michael E. Stevenson  
25 Chief of Enforcement

22 Presented by:

23   
24 Andrew Ledbetter  
25 Financial Legal Examiner