

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, and John  
Doe aka "Mohammad Younis" aka "Cornello  
Neagu,"

Respondents.

Case Number S-04-047-04-TO02

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

**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 John Doe aka "Mohammad Younis" aka "Cornello Neagu" 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 John Doe aka "Mohammad Younis" aka "Cornello Neagu." The Department also has reason to believe that John Doe aka "Mohammad Younis" aka "Cornello Neagu" has misappropriated the identity of Mohammad Younis of Blacksburg, Virginia and that grounds exist for amending the STATEMENT OF CHARGES, TEMPORARY ORDER TO CEASE

AMENDED STATEMENT OF CHARGES,  
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Securities Division  
PO Box 9033  
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1 AND DESIST, AND NOTICE OF INTENT TO IMPOSE FINES AND COLLECT COSTS, S-  
2 04-047-04-TO01, and dismissing the allegations against Mohammad Younis of Blacksburg,  
3 Virginia.

4 The Department finds as follows:

5 **TENTATIVE FINDINGS OF FACT**

6 **RESPONDENTS**

7  
8 1. Insure-Trades.com claimed to provide online escrow services with an office located in  
9 Blacksburg, Virginia. Insure-Trades.com had a website, viewable to Washington residents, that  
10 held out that it will do business in Washington State.

11 2. John Doe aka “Mohammad Younis” aka “Cornello Neagu” acquired the Insure-  
12 Trades.com website with a credit card in the name of “Mohammad Younis,” the name also used  
13 as the administrative and technical contact for Insure-Trades.com.

14 3. Mohammad Younis is a resident of Blacksburg, Virginia, who has denied any connection  
15 to Insure-Trades.com and has submitted evidence tending to show that his identity has been  
16 assumed by John Doe aka “Mohammad Younis” and aka “Cornello Neagu.”

17 **MISREPRESENTATIONS AND OMISSIONS**

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19 4. Insure-Trades.com and/or John Doe aka “Mohammad Younis” aka “Cornello Neagu”  
20 have maintained a website that claims to provide a “safe” means of transacting business and  
21 making certain payments over the Internet. Specifically, Insure-Trades.com and/or John Doe aka  
22 “Mohammad Younis” aka “Cornello Neagu” have claimed to be a “trusted third party that holds  
23 payment until a transaction is complete” in the context of business-to-business transactions,  
24 website domain name registrations, online vehicle purchases, and other web-based transactions.  
25

1 5. Insure-Trades.com and/or John Doe aka “Mohammad Younis” aka “Cornello Neagu”  
2 have claimed to have certain business partnerships, affiliations, and investors that they do not  
3 and never have possessed. For instance, the website has claimed the business is “backed by”  
4 Fidelity National Financial Inc., although it has never had this relationship. The website has also  
5 claimed to be an affiliate of Internet Escrow Services Inc., a California corporation principally  
6 located in Irvine, California, with its own website at [www.escrow.com](http://www.escrow.com). Internet Escrow  
7 Services Inc. has denied having any relationship with Insure-Trades.com, which it claims has  
8 pirated their website.  
9

10 6. Insure-Trades.com and/or John Doe aka “Mohammad Younis” aka “Cornello Neagu”  
11 have claimed to be licensed by several states, including license #963-1867 from the California  
12 Department of Corporations and license # 602-000-829 from the Washington State Department  
13 of Financial Institutions. Insure-Trades.com does not carry either of these California or  
14 Washington licenses. In fact, # 602-000-829 is not a Washington escrow license number; it is  
15 the Uniform Business Index for Internet Escrow Services Inc.  
16

#### 17 LICENSING STATUS

18 7. Insure-Trades.com and John Doe aka “Mohammad Younis” aka “Cornello Neagu” are  
19 not and never have been licensed with Washington State Department of Financial Institutions as  
20 escrow agents or officers.  
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#### 22 EMERGENCY AND PUBLIC INTEREST

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

1. Insure-Trades.com and/or John Doe aka “Mohammad Younis” aka “Cornello Neagu” constitute an “escrow agent” as defined in RCW 18.44.011.

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

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

4. The conduct described in the Tentative Findings of Fact is in violation of RCW 18.44.301(4) because, in claiming business affiliations and state licenses it does not have, Insure-Trades.com, John Doe aka “Mohammad Younis” aka “Cornello Neagu,” and/or their employees or agents have knowingly made, published, or disseminated false, deceptive, or misleading information in the conduct of escrow business, relating to escrow business, or relating to persons engaged in escrow business.

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**TEMPORARY ORDER TO CEASE AND DESIST**

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Based upon the foregoing:

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NOW, THEREFORE, IT IS HEREBY ORDERED that Insure-Trades.com, John Doe aka “Mohammad Younis” aka “Cornello Neagu,” and their employees and agents each cease and desist from violating RCW 18.44.301(1), which prohibits schemes to defraud any person.

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1 It is further ORDERED that Insure-Trades.com, John Doe aka "Mohammad Younis" aka  
2 "Cornello Neagu," and their employees and agents each cease and desist from violating RCW  
3 18.44.301(2), which prohibits unfair or deceptive practices toward any person.

4 It is further ORDERED that Insure-Trades.com, John Doe aka "Mohammad Younis" aka  
5 "Cornello Neagu," and their employees and agents each cease and desist from violating RCW  
6 18.44.301(4), which prohibits making, publishing, or distributing false, deceptive, or misleading  
7 escrow information.  
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### 9 CONTINUING INVESTIGATION

10 The Department is continuing to investigate the practices of the Respondents and their  
11 principals, employees, and agents to determine the full extent of the violations of the Escrow  
12 Agent Registration Act that have occurred in this matter.

### 13 NOTICE OF INTENT TO IMPOSE FINES AND COLLECT COSTS

14 Pursuant to RCW 18.44.440, and based on the above Tentative Findings of Fact and  
15 Conclusions of Law, the Department intends to ORDER that Insure-Trades.com and John Doe  
16 aka "Mohammad Younis" aka "Cornello Neagu" shall be jointly liable for and shall (1) pay the  
17 Department a fine in the amount of \$9,000; and (2) reimburse the Department the reasonable  
18 costs of investigating this matter.  
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### 20 ORDER DISMISSING RESPONDENT YOUNIS

21 On April 8, 2004, the Department of Financial Institution of the State of Washington  
22 issued a Statement of Charges, Temporary Order to Cease and Desist, and Notice of Intent to  
23 Impose Fines and Collect Costs, S-04-047-04-TO01, (the "Order") against Respondents Insure-  
24 Trades.com and Mohammad Younis. The Order, together with a Notice of Opportunity to Defend  
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26 AMENDED STATEMENT OF CHARGES,  
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1 and Opportunity for Hearing (the “Notice”) and an Application for Adjudicative Hearing (the  
2 “Application”) thereon, were personally served on Respondent Mohammad Younis of  
3 Blacksburg, Virginia on April 23, 2004. The Notice advised the Respondents that they each had  
4 twenty days from the date of receiving it to file a written application for an adjudicative hearing on  
5 the Order. Mohammad Younis waived his right to hearing and submitted a Response to Statement  
6 of Charges in Lieu of Formal Hearing, including exhibits A – D thereto. Younis denied any  
7 connection to Insure-Trades.com and submitted evidence tending to show that John Doe aka  
8 “Mohammed Younis” and aka “Cornello Neagu” had misappropriated his identity in operating  
9 Insure-Trades.com.

11 Therefore, based on the information available at this time, the Department of Financial  
12 Institutions hereby dismisses without prejudice from this matter Respondent Mohammad  
13 Younis, residing in Blacksburg, Virginia.

#### 16 **AUTHORITY AND PROCEDURE**

17 This Order is entered pursuant to the provisions of RCW 18.44.301 and RCW 18.44.440  
18 and is subject to the provisions of chapter 34.05 RCW. The Respondents may each make a  
19 written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND  
20 AND OPPORTUNITY FOR HEARING accompanying this order.

21 If a respondent does not request a hearing, the Department intends to adopt the above  
22 Tentative Findings of Fact and Conclusions of Law as final, to make the temporary order to  
23 cease and desist permanent, and to impose a \$9,000 fine against and to collect reasonable costs  
24 of the investigation from that respondent.

1 DATED this 16 day of August, 2004.

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4 Michael E. Stevenson  
5 Assistant Director  
6 Department of Financial Institutions

7 Approved by:

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9 Martin Cordell  
10 Chief of Enforcement

11 Presented by:

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13 Andrew Ledbetter  
14 Financial Legal Examiner

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