



State of Washington

DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES

P.O. Box 41200 ● Olympia, Washington 98504-1200
Telephone (360) 902-8700 ● TDD (360) 664-8126 ● <http://www.dfi.wa.gov>

March 18, 2011

Susan Chang, Managing Attorney
Metropolitan Law Group, Inc.
12900 NE 180th St., Suite 120
Bothell, WA 98011

RE: No Action Letter for Metropolitan Law Group under the Escrow Agent Registration Act

Dear Ms. Chang,

The Department of Financial Institutions, Consumer Services Division (“the Division”) received and reviewed your email of March 17, 2011, requesting a no-action letter regarding Metropolitan Law Group, Inc. and the Escrow Agent Registration Act, RCW 18.44 (the Act). As you know, Substitute House Bill 2564 (chapter 34, Laws of 2010) made changes to the attorney exception in the Act, and DFI has adopted rules at WAC 208-680-045 to implement those changes.

An escrow is a transaction where a person (the escrow agent) receives any written instrument, money, evidence of title to real or personal property, or other thing of value from a person or persons and transfers it to another person or persons, based on instructions from the principal parties to the transaction. This transaction must be for the purpose of effecting and closing the sale, purchase, exchange, transfer, encumbrance, or lease of real or personal property. Escrow does not include activities that require the exercise of legal discretion by an attorney. The Division considers an escrow transaction that involves exercise of legal discretion by an attorney as incidental to the practice of law and not subject to licensing under the Act.

In your request for a no action letter, you assert that your firm does not principally provide escrow services, that it only advertises as a law firm, that it only receives compensation for escrow services through the law firm, and that you (or another attorney) conduct or directly supervise all escrow transactions conducted by your firm.

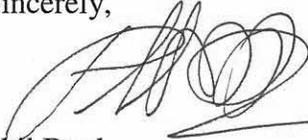
Based on the facts as you present them, the Division will not require your firm to submit an application for an escrow license and will take no action against you for unlicensed escrow activity. Because this determination is based upon the representations set forth in your letter, it should be noted that any different facts or conditions might result in a different conclusion. The Division reserves the right to make a different determination in the future, should either your firm’s circumstances or the law change.

This is a determination based on your firm’s specific circumstances, and has no effect or precedential value for persons in similar situations. Attorney exceptions from licensure are

individual exceptions based on admission to practice law in Washington, and do not apply to any non-attorney employee that might conduct escrow transactions independent of an attorney's oversight.

Thank you for contacting DFI. If you have any questions, please let me know. I may be reached at (360) 902 – 8755 or pbrady@dfi.wa.gov.

Sincerely,



Phil Brady
Staff Attorney