

What the File Needed to Show

A file-ready standard generated from reviewed escrow-related court-record cards: the question the file later needed to answer, the documents that mattered, the money-movement stage, the record gap, and the source posture that limits the claim.

<p>REVIEWED RECORDS</p> <p>129</p> <p>Public-promoted reviewed cards</p>	<p>FILE-RECORD QUESTIONS</p> <p>6</p> <p>Seller Proceeds</p>	<p>DOCUMENTS THAT MATTERED</p> <p>19</p> <p>129 records use topic inference</p>	<p>PUBLIC RULE</p> <p>Office decides</p> <p>Veto records the review</p>
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File-record questions by issue

Seller Proceeds	92	
Disbursement Authorization	27	
Escrow Instructions	26	
Wire Instructions	21	
Payoff Demands	19	
Post-Closing Evidentiary Disputes	16	

Documents that mattered

Escrow instructions	118	
Seller instructions	92	
Callback log	90	
Closing statement	90	
Authorization request	87	
Wire confirmation	75	
Disbursement authorization	27	
Amendments	20	

Money-movement stages

Seller proceeds stage	83
At release	26
Payoff stage	19
After release	1

Record gaps

Payee gap	59
Release-decision gap	25
Authorization gap	21
Amount gap	18
Source gap	5
Posture gap	1

Complaint vs. finding posture

Court of Appeal opinion	96
Supreme Court opinion	20
Federal court order	7
Complaint filed	6

Source ladder

Published opinion	121
Complaint	4
Court order	2
Federal court order	1
Indictment	1

How to use this

Start with the file-record question, open representative records, read the posture and limitation line, then inspect the source before using the record in a public claim or operator checklist.

Read the methods · Submit a correction

Source and claim boundary

What this standard is	A Veto standard for turning reviewed public escrow court records into file-record questions an operator can answer from a closing file.
What this standard is not	It is not legal advice, not a finding that a party failed to keep the file, and not a substitute for counsel, the docket, or the source record.
Source limit	It uses public-promoted reviewed court-record cards only. It excludes private OCR, raw PDFs, vendor labels, source-platform notes, private review notes, company pages, person pages, and regulatory rows.
How to read it	A file-record question describes what the record later needed to answer. Complaint-stage records remain allegations unless the reviewed source shows a later finding or order.
Corpus limit	The standard does not imply the corpus is complete, does not measure market prevalence, and does not rank companies, escrow holders, banks, buyers, sellers, agents, lenders, or title companies.

Veto receipt field crosswalk

Operative instruction	The signed instruction, amendment, payoff demand, seller-proceeds direction, or hold/release condition that controlled the file.
Authority path	The person or source allowed to give or change the instruction, plus the record showing that authority.
Independent confirmation	The known-contact callback, lender confirmation, beneficiary verification, or other confirmation path when the reviewed record makes that question relevant.

Money-movement decision

Who reviewed the discrepancy, when money was held or released, and what the file preserved before funds moved.

Posture and source

The source type, procedural posture, limitation line, source link, and correction path attached to the record.

Seller Proceeds

WHAT THE FILE NEEDED TO SHOW

Signed authorization for the new destination, evidence the prior instruction was retained, callback or verification record, and a documented hold or release decision by the office.

FILE-RECORD QUESTIONS

- Does the file show whether the seller authorized the destination change?
- Does the file show whether the escrow officer checked the change by callback?
- Does the file show whether prior instructions were retained in the file?
- Does the file show whether the office held or released before authorization?

DOCUMENTS THAT MATTERED

- Seller instructions
- Authorization request
- Callback log
- Wire confirmation
- Closing statement
- Escrow instructions

REPRESENTATIVE RECORDS

United States v. Approximately \$325,690.00 Seized From Bank of America — E.D. Cal. order

E.D. Cal. · Federal court order · January 31, 2024

Original instruction, change request, independent known-contact callback/source, match/gap notes, reviewer, and office action before release.

Tung v. Chicago Title — California Court of Appeal

Cal. Ct. App. 1st Dist. · Court of Appeal opinion · January 1, 2021

Modern appellate guidance on foreseeability of damages after escrow closes on a rescinded residential sale.

Appel v. Boston National Title Agency — S.D. Cal. order

S.D. Cal. · Federal court order · June 10, 2020

Shows why escrow-account deposit records, written escrow instructions, control over release, and interpleader statements matter when funds are not returned promptly.

California Executive Escrow v. Bell et al. — Federal court complaint

C.D. Cal. · Complaint filed · January 1, 2020

Teaches seller-proceeds disbursement review from a federal complaint docket.

This topic section is a source-review aid. It does not say every record has the same facts, outcome, legal rule, or office decision.

Disbursement Authorization

WHAT THE FILE NEEDED TO SHOW

Authorization records, condition checklist, and documented hold or release decision.

FILE-RECORD QUESTIONS

- Does the file show whether conditions precedent were met before release?
- Does the file show whether authorization matched the escrow instructions?
- Does the file show whether funds were released before required signatures?
- Does the file contain authorization records, condition checklist, and documented hold or release decision?

DOCUMENTS THAT MATTERED

- Disbursement authorization
- Escrow instructions
- Condition checklist
- Hold notice

REPRESENTATIVE RECORDS

Rideau v. Stewart Title — California Court of Appeal

Cal. Ct. App. 4th Dist. Div. 1 · Court of Appeal opinion · April 14, 2015

Shows why sale escrow instructions must make the release path for deposited funds explicit and preserve the basis for any disbursement.

Castillo v. Express Escrow — California Court of Appeal

Cal. Ct. App. 2d Dist. Div. 6 · Court of Appeal opinion · January 1, 2007

Teaches statutory dispute-notice duties for California mobile-home escrows and that form escrow instructions cannot waive Health and Safety Code deposit-hold requirements.

Money Store v. Southern California Bank — California Court of Appeal

Cal. Ct. App. 4th Dist. · Court of Appeal opinion · January 1, 2002

Teaches lenders can contract directly with escrow banks via closing instructions — escrow addenda cannot override lender disbursement rules without notice (foundation for Plaza Home Mortgage v. North American Title).

Brown v. Boren — California Court of Appeal

Cal. Ct. App. 2d Dist. · Court of Appeal opinion · January 1, 1999

Teaches 1990s automatic subordination escrows still require lender compliance with escrow caps — excess loan amounts revive the seller's senior purchase-money lien.

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Escrow Instructions

WHAT THE FILE NEEDED TO SHOW

Executed instructions, amendments, and disbursement mapping to signed terms.

FILE-RECORD QUESTIONS

- Does the file show whether the office followed the written instructions?
- Does the file show whether amendments were properly authorized?
- Does the file show whether ambiguous terms were clarified before release?
- Does the file contain executed instructions, amendments, and disbursement mapping to signed terms?

DOCUMENTS THAT MATTERED

- Escrow instructions
- Amendments
- Signature pages
- Closing statement

REPRESENTATIVE RECORDS

Appel v. Boston National Title Agency — S.D. Cal. order

S.D. Cal. · Federal court order · June 10, 2020

Shows why escrow-account deposit records, written escrow instructions, control over release, and interpleader statements matter when funds are not returned promptly.

Attisha Enterprises v. Capital One Bank — S.D. Cal. order

S.D. Cal. · Federal court order · December 7, 2020

Shows the source records needed when a buyer expects escrow funds to reach a title company but the transfer lands in another account: instructions, recipient account, notice, and withdrawal timing.

Ovation v. Chicago Title — S.D. Cal. order

S.D. Cal. · Federal court order · September 23, 2020

Shows the escrow-account proof problem in a liquor-license funding platform: who owned the funds, which escrow accounts held them, and what source records supported return obligations.

SASA Investment v. Chhatrala — S.D. Cal. order

S.D. Cal. · Federal court order · February 19, 2020

Shows the records needed when funds are wired to a title company as escrow agent: transfer authorization, escrow-party status, purpose instructions, notice, and withdrawal accounting.

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Wire Instructions

WHAT THE FILE NEEDED TO SHOW

Prior and revised wire instructions, callback log, and beneficiary verification before release.

FILE-RECORD QUESTIONS

- Does the file show whether wire instructions were changed without authorization?
- Does the file show whether beneficiary names matched account records?
- Does the file show whether callback verification occurred before release?
- Does the file contain prior and revised wire instructions, callback log, and beneficiary verification before release?

DOCUMENTS THAT MATTERED

- Wire instructions
- Beneficiary verification
- Callback log
- Outgoing wire confirmation

REPRESENTATIVE RECORDS

Little Seeds Children's Center v. Citibank — N.D. Cal. order

N.D. Cal. · Federal court order · January 1, 2025

Shows how a court analyzed unauthorized payment-order allegations: authorization, security procedure, normal wire history, bank alerts, and rapid transfer timing.

Thomas v. Corbyn Restaurant Development — California Court of Appeal

Cal. Ct. App. 4th Dist. · Court of Appeal opinion · January 1, 2025

Teaches settlement-fund wire verification and imposter-rule loss allocation when disbursement instructions change midstream.

Ozer Holdings v. Citibank — E.D. Cal. docket

E.D. Cal. · Complaint filed · January 1, 2024

Teaches California UCC wire-transfer refund and bank-knowledge duties after rapid outbound wires from commercial accounts.

United States v. Approximately \$325,690.00 Seized From Bank of America — E.D. Cal. order

E.D. Cal. · Federal court order · January 31, 2024

Original instruction, change request, independent known-contact callback/source, match/gap notes, reviewer, and office action before release.

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Payoff Demands

WHAT THE FILE NEEDED TO SHOW

Checked payoff demand, lender confirmation, and disbursement timing relative to the good-through date.

FILE-RECORD QUESTIONS

- Does the file show whether the payoff demand matched the lender of record?
- Does the file show whether good-through dates were honored before release?
- Does the file show whether the office checked the demand before disbursement?
- Does the file contain checked payoff demand, lender confirmation, and disbursement timing relative to the good-through date?

DOCUMENTS THAT MATTERED

- Payoff demand
- Lender verification
- Good-through date
- Disbursement authorization
- Escrow instructions

REPRESENTATIVE RECORDS

Citrus El Dorado v. Chicago Title — California Court of Appeal

Cal. Ct. App. 4th Dist. · Court of Appeal opinion · January 1, 2019

Clarifies limits on trustee and title-company investigative duties during nonjudicial foreclosure — relevant to payoff and assignment disputes.

Branscomb v. JPMorgan Chase Bank — California Court of Appeal

Cal. Ct. App. 1st Dist. Div. 1 · Court of Appeal opinion · January 31, 2014

Shows how a zero payoff demand, reconveyance request, escrow receipt, and equitable priority fight can turn on what the escrow file showed and who owed duties.

Bedrock Financial v. IRS — E.D. Cal. order

E.D. Cal. · Federal court order · May 21, 2013

Shows refinance escrow proof issues: closing instructions, lien priority, payoff amount, tax-lien notice, disbursement ledger, and whether proceeds were routed to junior claims.

Plaza Home Mortgage v. North American Title — California Court of Appeal

Cal. Ct. App. 4th Dist. · Court of Appeal opinion · January 1, 2010

Teaches post-close escrow disbursement duties and lender reliance on recorded closing instructions after funding.

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Post-Closing Evidentiary Disputes

WHAT THE FILE NEEDED TO SHOW

Retention log, audit trail, and closing file index at time of dispute.

FILE-RECORD QUESTIONS

- Does the file show whether required records were retained after closing?
- Does the file show whether audit trails showed who changed what and when?
- Does the file show whether missing documentation was explainable from the file?
- Does the file contain retention log, audit trail, and closing file index at time of dispute?

DOCUMENTS THAT MATTERED

- Record retention log
- Audit trail
- Closing file index
- Correspondence file

REPRESENTATIVE RECORDS

Branscomb v. JPMorgan Chase Bank — California Court of Appeal

Cal. Ct. App. 1st Dist. Div. 1 · Court of Appeal opinion · January 31, 2014

Shows how a zero payoff demand, reconveyance request, escrow receipt, and equitable priority fight can turn on what the escrow file showed and who owed duties.

Markowitz v. Fidelity National — California Court of Appeal

Cal. Ct. App. 2d Dist. Div. 4 · Court of Appeal opinion · August 30, 2006

Teaches the duty boundary for sub-escrow payoff and reconveyance handling when money and documents are exchanged to clear a deed of trust.

Bartold v. Glendale Federal Bank — California Court of Appeal

Cal. Ct. App. 4th Dist. Div. 3 · Court of Appeal opinion ·
June 19, 2000

Teaches that payoff, reconveyance, trustee, lender,
and escrow correspondence must show who was
supposed to deliver and record post-payoff
documents.

Cathay Bank v. Fidelity National Title — California Court of Appeal

Cal. Ct. App. 2d Dist. Div. 2 · Court of Appeal opinion ·
May 14, 1996

Shows why payoff-demand amounts, sub-escrow
payment, close timing, and release/reconveyance
records matter in title and escrow files.

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This standard is generated from reviewed public card metadata only. It excludes private OCR, raw PDFs, source-platform labels, company pages, person pages, regulatory rows, and unreviewed R2 corpus material. It only uses public-promoted reviewed court-record cards, and it does not imply the corpus is complete.