



## Insurance Department

TODD E. KISER  
*Insurance Commissioner*

### State of Utah

GARY R. HERBERT  
*Governor*

SPENCER J. COX  
*Lieutenant Governor*

September 29, 2015

### PUBLIC LETTER OF ADMONITION

Mr. Matt Sager  
First American Title Insurance Agency, LC  
215 S. State Street, Ste. 280  
Salt Lake City, Utah 84111  
By email to: msager@firstam.com

Re: Investigation no. 63753

Pursuant to a complaint filed with the Utah Insurance Department (“Department”), the Department’s investigation concludes with the issuance of this Public Letter of Admonition to First American Title Insurance Agency, LC, (the “Agency”), for violations of the Unfair Methods of Competition, Acts, and Practices.

#### **Administrative Rule 592-6-4(15)**

“Sponsoring, cosponsoring, subsidizing, contributing fees, prizes, gifts, food or otherwise providing anything of value for an activity of a client, except as allowed under Subsection R592-6-5(6). Activities include open houses at homes or property for sale, meetings, breakfasts, luncheons, dinners, conventions, installation ceremonies, celebrations, outings, cocktail parties, hospitality room functions, open house celebrations, dances, fishing trips, gambling trips, sporting events of all kinds, hunting trips or outings, golf or ski tournaments, artistic performances and outings in recreation areas or entertainment areas.” (*Emphasis added*).

The subject of the complaint is the “Property Feedback” card (“cards”) provided by the Agency and its employee for an activity of a client. The cards were distributed to real estate agents at an Equity Real Estate sales meeting and real estate home tour in St. George, Utah. The cards allowed the touring real estate agents to provide feedback to the listing real estate agents for their respective listings. The cards have no self-promotional characteristics related to the business of title insurance. The tour is an activity of a client and the cards provided value to the client, by way of feedback, in violation of the Rule.

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The distribution of each card could be assessed a forfeiture of \$1,000 each. At this time, the Department is not assessing a forfeiture on the condition the Agency and its employees discontinue the use of the cards as stated in your letter dated August 21, 2015.

This letter is the only action the Department will take. Evidence of any similar activities in the future may be just cause for commencement of an administrative proceeding that may result in the imposition of sanctions or penalties against the Agency.

This Letter of Admonition is public and will be published on the Department's website. In addition and without revealing identity, the facts of this letter may be abstracted and published for educational purposes.

Any questions regarding this action should be directed to the undersigned.

Sincerely,

TODD E. KISER  
UTAH INSURANCE COMMISSIONER

A handwritten signature in cursive script that reads "Suzette Green-Wright". The signature is written in black ink and is positioned below the typed name of the signatory.

By: Suzette Green-Wright, Director  
Market Conduct Division