



## State of Utah

SPENCER J. COX  
Governor

DEIDRE M. HENDERSON  
Lieutenant Governor

## Insurance Department

JONATHAN T. PIKE  
Insurance Commissioner

### Title & Escrow Commission Meeting

(<https://insurance.utah.gov/licensee/title/tec>)

**Date:** **November 14, 2022**

**Place:** **In Person**

**Virtual**

**Time:** **9:00 AM**

Taylorsville SOB  
4315 S. 2700 W.  
Big Cottonwood Room  
Taylorsville, UT 84129

Google Meet  
[meet.google.com/npx-ysqy-jof](https://meet.google.com/npx-ysqy-jof)  
260-702-9425 Phone  
348 003 603# Password

### ATTENDEES

#### TITLE & ESCROW COMMISSION

Chair, Kim Holbrook (*Insurer, Davis County*)

Darla Milovich (*Agency, Salt Lake County*)

Vice Chair, Chase Phillips (*Agency, Weber County*)

Cal Robinson (*Agency, Iron County*)

Jeff Mathews (*Public Member, Morgan County*)

Perri Babalis, *AG Counsel - TEC*

#### DEPARTMENT STAFF

Jon Pike, *Insurance Commissioner*

Reed Stringham, *Deputy Comm.*

Tracy Klausmeier, *P&C Dir.*

Randy Overstreet, *Licensing Dir.*

Patrick Lee, *Finance Dir.*

Adam Martin, *MC Examiner*

Shelley Coudreaux, *AG Counsel - UID*

Michael Covington, *CE Specialist*

Steve Gooch, *PIO Recorder*

### AGENDA

#### General Session: (*Open to the Public*)

- **Welcome** / Kim Holbrook, Chair
- **Telephone Roll Call**
- **Adopt Minutes of Previous Meeting**
  - October 17 TEC
  - October 17 TEC/REC
- **Concurrence Reports** / Kim
  - Licenses
  - Penalties
    - William Justin Fry (Docket #2022-4438)
    - First Integrity Title Insurance Agency (Docket #2022-4439)
  - Continuing education
- **Board Duties & Responsibilities** / Perri
- **Update on 2022 Goals**
  - ULTA report / Kim
- **New Business**
- **Old Business**
  - R592-18 update / Reed
- **Other Business**
- **Hot Topics**

*Executive Session* (None)

- **Adjourn**
- **Next Meeting: December 19, 2022** — Big Cottonwood Room, Taylorsville State Office Building

**2022 Meeting Schedule**

Jan 10	Feb 14	Mar 14	Apr 11	May 9	<b>Jun 13</b>
Jul 11	Aug 22	Sept 12	Oct 17*	Nov 14	Dec 19

\*Proposed TEC/REC meeting immediately following

**2022 Goals**

1. Continue making sure testing is relevant
2. Continue working with the Real Estate Commission
3. Continue working with the ULTA as a liaison
4. Increase awareness of wire fraud's effect on consumers and agencies
5. Increase awareness of affiliated business arrangements (ABA)

**Title Agency Licensing  
October 2022**

**New Licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
202196	MORTGAGE CONNECT TITLE INSURANCE AGENCY OF UTAH, LLC	2022-10-13	2024-10-31	TE
202196	MORTGAGE CONNECT TITLE INSURANCE AGENCY OF UTAH, LLC	2022-10-13	2024-10-31	TS

**Renewal Licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
176409	AMERICAN FIRST ESCROW AND TITLE INSURANCE AGENCY	2014-10-30	2024-10-31	TE
176409	AMERICAN FIRST ESCROW AND TITLE INSURANCE AGENCY	2014-10-30	2024-10-31	TS
159323	AMROCK UTAH, LLC	2008-10-07	2024-10-31	TE
159323	AMROCK UTAH, LLC	2008-10-07	2024-10-31	TMR
159323	AMROCK UTAH, LLC	2008-10-07	2024-10-31	TS
11811	INTEGRATED TITLE INSURANCE SERVICES LLC	2002-10-08	2024-10-31	TE
11811	INTEGRATED TITLE INSURANCE SERVICES LLC	2002-10-08	2024-10-31	TS
170486	LEGAL TITLE INSURANCE AGENCY, LLC	2012-10-22	2024-10-31	TE
170486	LEGAL TITLE INSURANCE AGENCY, LLC	2012-10-22	2024-10-31	TMR
170486	LEGAL TITLE INSURANCE AGENCY, LLC	2012-10-22	2024-10-31	TS
7626	MT. OLYMPUS TITLE INSURANCE AGENCY INC	1998-10-07	2024-10-31	TE
7626	MT. OLYMPUS TITLE INSURANCE AGENCY INC	1998-10-07	2024-10-31	TS
189121	OASIS TITLE, LLC	2018-10-03	2024-10-31	TE
189121	OASIS TITLE, LLC	2018-10-03	2024-10-31	TS
170365	SOLIDIFI TITLE AGENCY OF UTAH LLC	2012-10-11	2024-10-31	TE
170365	SOLIDIFI TITLE AGENCY OF UTAH LLC	2012-10-11	2024-10-31	TS
7610	UNLIMITED TITLE INSURANCE & ESCROW INC	1998-08-28	2024-10-31	TE
7610	UNLIMITED TITLE INSURANCE & ESCROW INC	1998-08-28	2024-10-31	TS
7430	WASATCH LAND & TITLE INSURANCE AGENCY INC	1996-02-22	2024-05-31	TE
7430	WASATCH LAND & TITLE INSURANCE AGENCY INC	1996-02-22	2024-05-31	TS

**Lapsed Licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expired Date</b>	<b>LOA</b>
(none)				

**Reinstated Licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>Reinstated</b>	<b>LOA</b>
6223	SECURITY TITLE INSURANCE AGENCY OF UTAH, INC	1982-04-08	2024-09-30	2022-10-04	TE
6223	SECURITY TITLE INSURANCE AGENCY OF UTAH, INC	1982-04-08	2024-09-30	2022-10-04	TMR
6223	SECURITY TITLE INSURANCE AGENCY OF UTAH, INC	1982-04-08	2024-09-30	2022-10-04	TS

**Title Agent Licensing  
October 2022**

**New Licenses**

<b>Individual ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
2046960	HENDER, LINDSAY	2022-10-31	2025-09-30	TMR
2059890	HERRERA, STEPHANIE	2022-10-06	2025-08-31	TE
2059523	LUU, PHIMTRA	2022-10-14	2025-04-30	TE
2053649	MCCLLOUD, MALIA	2022-10-12	2025-07-31	TE
2032859	OLSEN, MATTHEW	2022-10-12	2025-09-30	TE
2032859	OLSEN, MATTHEW	2022-10-12	2025-09-30	TS
2062445	TWITCHELL, HUNTER	2022-10-18	2025-03-31	TE
2059536	WALKER, DALLEN	2022-10-06	2025-04-30	TMR

**Renewed Licenses**

<b>Individual ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
42860	AVERETT, DANA	1998-10-29	2024-10-31	TE
18207	BATES, ROBERT	2000-05-03	2024-10-31	TS
1857716	BEALL, TANYA	2020-02-27	2024-10-31	TE
1662686	BENNETT, KATY	2018-10-25	2024-10-31	TE
37532	CAZIER, KAYE	1991-12-23	2024-10-31	TE
74317	CHATELAIN, BRIGITTE	2002-02-14	2024-10-31	TE
103725	COLTER, KRISTIN	2004-07-13	2024-10-31	TE
39289	CRANDALL, MICHAEL	1996-01-16	2024-10-31	TE
39289	CRANDALL, MICHAEL	2019-01-30	2024-10-31	TS
63711	DE LA MARE, MICHAEL	2001-03-13	2024-10-31	TE
37195	DRIGGS, MAX	1999-10-01	2024-10-31	TE
1507016	FREELAND, TERESA	2012-10-19	2024-10-31	TE
1883689	GOLDEN, KAHRI	2020-08-06	2024-10-31	TE
1883689	GOLDEN, KAHRI	2021-07-28	2024-10-31	TS
34837	GOODMAN, MELINDA	1997-12-10	2024-10-31	TE
132707	GRIM, ROBERT	2006-08-14	2024-10-31	TE
1644797	HARPER, TOM	2016-02-05	2024-10-31	TS
1644797	HARPER, TOM	2015-12-28	2024-10-31	TMR
1644797	HARPER, TOM	2016-02-05	2024-10-31	TE
33614	HASKELL, KRISTIN	1996-04-11	2024-10-31	TE
38762	HOLLIDAY, BRENDA	1992-09-28	2024-10-31	TE
30858	HOUGHTON, JERRY	1988-01-19	2024-10-31	TE
30858	HOUGHTON, JERRY	1988-01-19	2024-10-31	TS
52571	IMBODEN, CHARLES	1992-12-18	2024-10-31	TS
52571	IMBODEN, CHARLES	1990-05-14	2024-10-31	TE
1876690	JOHNSON, CHELSEA	2020-10-09	2024-10-31	TE
26268	Johnson, Marta	1991-11-20	2024-10-31	TE
39243	KOLB, KLAYTON	1999-12-17	2024-10-31	TS
25610	KUEHNDAHL, KRIS	1991-12-27	2024-10-31	TE
1368793	LAMOREAUX, DALLAS	2008-08-05	2024-10-31	TE
32572	LARSEN, MITCH	1994-06-13	2024-10-31	TMR
76971	LEWIS, BRADLEY	2019-05-08	2024-10-31	TS
76971	LEWIS, BRADLEY	2002-05-08	2024-10-31	TE

**Renewed Licenses**

<b>Individual ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
81905	MILOVICH, DARLA	2002-09-30	2024-10-31	TE
42657	MOON, BONNIE	1994-06-20	2024-10-31	TE
97251	MORGAN, HILERY	2004-02-04	2024-10-31	TE
44794	NEWMAN, STEVEN	1986-10-17	2024-10-31	TE
44794	NEWMAN, STEVEN	1986-10-17	2024-10-31	TS
45134	OWENS, BRANDON	2002-01-24	2024-10-31	TS
30347	PERKINS, TINA	1984-09-21	2024-10-31	TS
40935	PURSER, HEATHER	1994-06-09	2024-10-31	TE
1421394	Parry, Braundie	2010-05-11	2024-10-31	TMR
1757866	QUINTEROS, LIZETH	2018-04-12	2024-10-31	TE
32425	RASBAND, LARRY	2000-10-17	2024-10-31	TS
32425	RASBAND, LARRY	2000-10-17	2024-10-31	TE
127975	RICHARDS, ANGELA	2006-04-18	2024-10-31	TE
105983	RODMAN, CRAIG	2005-10-26	2024-10-31	TE
105983	RODMAN, CRAIG	2004-09-23	2024-10-31	TMR
1468701	ROEDER, PATRICK	2011-12-14	2024-10-31	TE
45335	ROEDER, WILLIAM	1991-12-27	2024-10-31	TE
1681475	SANDGREN, ROBYN	2016-10-25	2024-10-31	TS
1784137	SMITH, DEANN	2018-09-25	2024-10-31	TE
33044	SMITH, LAUREL	1996-05-28	2024-10-31	TE
98894	SMITH, KAREN	2005-06-07	2024-10-31	TE
98894	SMITH, KAREN	2004-02-20	2024-10-31	TMR
1640806	SMITH, RUSS	2015-11-24	2024-10-31	TMR
1682848	SPENCER, JENNIFER	2016-10-19	2024-10-31	TS
52903	STUART, CHARLES	1981-06-17	2024-10-31	TS
52903	STUART, CHARLES	1992-01-24	2024-10-31	TE
1680549	TOYN, MATTHEW	2016-10-11	2024-10-31	TE
64059	VEST, MARK	2001-03-16	2024-10-31	TS
38328	WALTON, JAMES	1996-08-20	2024-10-31	TS
44979	WATKINS, STEPHEN	1990-10-22	2024-10-31	TE
44979	WATKINS, STEPHEN	1990-10-22	2024-10-31	TS
51024	WILSON, MARK	1994-05-27	2024-10-31	TE
51024	WILSON, MARK	1994-05-27	2024-10-31	TS

**Lapsed Licenses**

<b>Individual ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expired Date</b>	<b>LOA</b>
1890670	Campbell, Crystal	2020-08-12	2022-09-30	TE
39019	EASTBURN, DANNY	2002-02-07	2022-09-30	TS
39019	EASTBURN, DANNY	2003-09-11	2022-09-30	TE
1878011	MERRILL, RAYNIE	2020-08-13	2022-09-30	TE
39946	OLSEN, CHRISTINA	1996-04-04	2022-09-30	TE
1357235	OMAN, PETREA	2018-03-20	2022-09-30	TE
1885130	SELVAGE, HEATHER	2020-09-22	2022-09-30	TE
105892	WATSON, ANGIE	2004-09-20	2022-09-30	TE

**Reinstated Licenses**

<b>Individual ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>Reinstated</b>	<b>LOA</b>
98618	WOOLF, BENJAMIN	2004-02-11	2024-08-31	2022-10-03	TE

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**BEFORE THE UTAH INSURANCE COMMISSIONER**

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UTAH INSURANCE DEPARTMENT,

Complainant,

vs.

WILLIAM JUSTIN FRY,

Respondent.

**IMPOSITION OF PENALTY IN  
COMPLIANCE WITH UTAH CODE  
§ 31A-2-404(1)(b)(ii)**

Docket No. 2022-4438

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Pursuant to Utah Code § 31A-2-404(1)(b)(ii), I Jonathan T. Pike, Utah Insurance Commissioner consulted with and sought the concurrence of the Title and Escrow Commission, in an open meeting, regarding the imposition of the penalty set forth in the Findings of Fact, Conclusions of Law and Order in this matter. I hereby agree with and impose said penalty.

Dated: \_\_\_\_\_, 2022.

\_\_\_\_\_  
Jonathan T. Pike  
Utah Insurance Commissioner

**NOTICE**

Pursuant to Utah Code § 63G-4-203(1)(i) and Utah Admin. Code R590-160-8(1), an Order shall become final and take full effect, 15 days after the Notice of Agency Action and Order is emailed to Respondent unless a request for a hearing is received from Respondent prior to that date. A respondent's failure to timely request a hearing in an informal adjudicative proceeding will be considered a failure to exhaust administrative remedies pursuant to Utah Admin. Code R590-160-7(2).



**CERTIFICATE OF SERVICE**

The undersigned certifies that on this date a true and correct copy of the foregoing Imposition of Penalty in Compliance with Utah Code § 31A-2-402(1)(b)(ii) were emailed to:

Shelley A. Coudreaut  
Assistant Attorney General  
[sacoudreaut@agutah.gov](mailto:sacoudreaut@agutah.gov)

William Justin Fry  
[jfriz86@gmail.com](mailto:jfriz86@gmail.com)

DATED this @day of @2022.

/s/  
Utah Insurance Department  
4315 S. 2700 W., Suite 2300  
Taylorsville, UT 84129  
801-957-9321

SHELLEY A. COUDREAUT (9663)  
Assistant Attorney General  
SEAN D. REYES (7969)  
Attorney General  
Attorneys for Utah Insurance Department  
160 East 300 South, 5th Floor  
P.O. Box 140874  
Salt Lake City, Utah 84114-0874  
Telephone: (801) 366-0375  
Email: sacoudreaut@agutah.gov

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**BEFORE THE UTAH INSURANCE COMMISSIONER**

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<p style="text-align: center;">UTAH INSURANCE DEPARTMENT,  Complainant,  vs.  FIRST INTEGRITY TITLE INSURANCE AGENCY, LLC.,  Respondent.</p>	<p style="text-align: center;">FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER</p> <p>Docket No. 2022-4439</p> <p>Donald H. Hansen Administrative Law Judge/Presiding Officer</p>
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Complainant, Utah Insurance Department ("Department") and Respondent, First Integrity Title Insurance Agency, LLC. have stipulated to entry of the following Findings of Fact, Conclusions of Law, and Order.

Based upon that stipulation, and good cause appearing, the Presiding Officer makes and enters the following:

**FINDINGS OF FACT**

1. Respondent is a Utah resident producer organization holding Utah license number 707793.
2. Respondent's mailing address is 134 North 200 East, STE 203, St. George, UT 84770.

3. Pursuant to Utah Admin. Code R592-11-3, an agency title insurance producer is required to file annually with the commissioner, no later than April 30<sup>th</sup> of each year, a Title Insurance Producer Annual Report that includes the number and location of each title or escrow trust account; proof of financial protection under subsection § 31A-23a-204(2)(a); the name of the individual title insurance producer designated as the “qualifying licensee” under subsection §31A-23a-204 (1); the physical address in Utah maintained by an agency title insurance producer under subsection 31A-23a-406(1)(e)(g); and the physical address of each Utah branch office maintained by an agency title insurance producer.

4. On April 20, 2022, Respondent filed its annual report. While conducting a review of the agency for compliance, the Department discovered the following violations:

- a. The Respondent did not have an active title escrow licensee to process the title escrow;
- b. The Respondent did not have an active designated producer for title escrow;
- c. The Respondent did not have an active title escrow qualifying licensee;
- d. The Respondent was using a bank that did not have an office in Utah; and
- e. The Respondent’s business address was in an executive virtual style office location.

5. On May 5, 2022, an audit review of the agency was initiated by the Department and Respondent was requested to provide numerous documents as part of the audit.

6. Pursuant to Utah Code § 31A-23a-103(1)(c), a person may not utilize the services of another as a producer... if that person knows or should know that the other does not have a license as required by law. Closing settlement documents provided by the Respondent show that between October 17, 2019, through June 16, 2022, the Respondent used Michelle Elder, an unlicensed producer, to conduct its escrow closings on properties located in Utah. The

Respondent disclosed that 615 escrow closings were conducted on Utah properties by Michelle Elder, acting on behalf of the Respondent, during that time.

7. Pursuant to Utah Code § 31A -23a-302(1), an agency shall designate an individual that has an individual producer license... to act on the agency's behalf in order for the licensee to do business for the agency in this state. In reviewing the settlement documents referred to in paragraph 5, it was determined that between October 17, 2019, through June 16, 2022, the Respondent also used an unassociated producer when it failed to designate Michelle Elder, an unlicensed producer, as a designee to the agency, to conduct business on the agency's behalf.

8. Pursuant to Utah Code § 31A -23a-409(2), trust money required to be deposited under subsection (1) shall be deposited: (a) in a federally insured trust account in a depository institution, as defined in Section 7-1-103, which: (i) has an office in this state, if the licensee depositing the money is a resident licensee.

9. Pursuant to Utah Code § 31A-23a-406(1)(d) an agency title insurance producer may do escrow involving real property transactions if ... money deposited with the agency title insurance producer in connection with any escrow is deposited: (i) in a federally insured depository institution, as defined in Section 7-1-103, that: (A) has an office in this state, if the agency title insurance producer depositing the money is a resident licensee.

10. On May 18, 2022, the Respondent provided the Department with a copy of its trust account bank statements showing trust account deposits with First Western Trust, a bank that does not have an office in Utah. The Respondent disclosed that 615 escrow closings on Utah properties were conducted utilizing First Western Trust.

11. Pursuant to Utah Code § 31A-23a-406(1)(i) an agency title insurance producer may

do escrow if ... the agency title insurance producer maintains a physical office in Utah, staffed by a person with an escrow subline of authority who processes the escrow.

12. On June 13, 2022, Adam Martin (Martin), an examiner with the Department's Property & Casualty Division, conducted an office visit to the Respondent at the Respondent's business address on record with the Department. Upon arrival, Martin noticed that there was no physical office staffed by a licensed producer. The receptionist, who is not a licensed producer with an Escrow subline of authority, explained that the Respondent did not have a physical office but an executive virtual style suite with no staff.

13. Pursuant to Utah Code § 31A-23a-204(1)(c), a person licensed as an agency title insurance producer shall at all times during the term of the licensure be owned or managed by at least one individual who is licensed for at least three years within the proceeding five-year period with both, (i) a title examination line of authority; and (ii) an escrow line of authority. This is known to the Department as a "qualifying licensee".

14. Between October 17, 2019, through June 16, 2022, the Respondent conducted insurance related business without an active title escrow qualifying licensee for the agency. On May 16, 2022, a review of Department SIRCON records, showed that John Lish, the "Qualifying Active Officer (Title Escrow)" designation with the Respondent was terminated on October 17, 2019. The Respondent had no other designated escrow licensed producers.

15. Based on the violations outlined above, the Department and Respondent have agreed to an administrative forfeiture of \$5,000.00.

## **CONCLUSIONS OF LAW**

1. The Utah Insurance Commissioner (“Commissioner”) has jurisdiction over the parties and this adjudicative proceeding pursuant to Utah Code §§ 31A-1-105 and 31A-2-201.

2. The Commissioner has legal authority to impose penalties on the Department's licensees who violate the Utah Insurance Code pursuant to Utah Code § 31A-2-308.

3. Respondent violated Utah Code § 31A-23a-103(1)(c) when it used the services of Michelle Elder, an unlicensed producer, to conduct 615 escrow closings on properties located in Utah. Respondent had no active title escrow producer from October 17, 2019, through June 16, 2022.

4. Respondent violated Utah Code § 31A-23a-302(1) when it used an unlicensed producer, Michelle Elder, who was not designated to the agency by the Respondent, to conduct business on the agency’s behalf. Department records show that from October 17, 2019, through June 16, 2022, Elder performed 615 escrow closings on Utah properties on behalf of Respondent, but Respondent had failed to designate a Title Escrow producer to act on the Respondent’s behalf.

5. Respondent violated Utah Code §§ 31A-23a-409(2) and 31A-23a-406(1)(d) when it placed trust funds in First Western Trust, a bank that does not have an office in Utah. Respondent disclosed that 615 escrow closings on Utah properties were conducted utilizing First Western Trust.

6. Respondent violated Utah Code § 31A-23a-406(1)(i) when it failed to have a physical office in Utah staffed by an escrow licensee. Respondent utilized an executive virtual style suite, staffed by a receptionist who is not an escrow licensee.

7. Respondent violated Utah Code § 31A-23a-204(1)(c) by conducting insurance related business from October 17, 2019, through June 16, 2022, without an active title escrow qualifying licensee for the agency.

8. As a penalty for the violations in this case, Respondent should be ordered to pay a forfeiture of \$5,000.00.

### **ORDER**

Based on the foregoing Findings of Fact and Conclusions of Law, it is hereby Ordered that:

1. Respondent shall pay a forfeiture of \$5,000.00 for the violations described in the Conclusions of Law.

2. Payment in full is due, by the Respondent to the Department, no later than thirty (30) days after the date this Order has been signed. The parties further agree that if the full payment amount is not paid within the specified time, the Department may, at its option, either: (a) pursue legal collection action to recover the forfeiture amount, in which case Responded shall be liable to pay, in addition to the forfeiture amount, any costs and expenses, including court costs and reasonable attorney fees, incurred by the Department in attempting to recover said forfeiture; or (b) rescind the settlement agreement reflected in this Findings of Fact, Conclusions of Law and Order, and reinstate the Notice of Agency Action issued in this case, and proceed with the agency action against Respondent proposed therein.

3. Respondent is ordered not to commit any of the violations described in the Conclusions of Law in the future.

DATED this 28<sup>th</sup> day of October, 2022.

JONATHAN T. PIKE  
Utah Insurance Commissioner

/s/ Donald H. Hansen  
Donald H. Hansen  
Administrative Law Judge/Presiding Officer  
Utah Insurance Department  
4315 South 2700 West, Suite 2300  
Taylorsville, UT 84129  
801-957-9321  
Email: [uidadmincases@utah.gov](mailto:uidadmincases@utah.gov)

### **NOTICE TO RESPONDENT**

Failure to obey this Order may subject you to further penalties that include a forfeiture of up to \$2,500 per violation, with each day of the violation constituting a separate violation. Other penalties for failing to obey this Order may include license suspension, probation, refusal to renew, or revocation. Failure to obey this Order may also result in an action taken against you in a court of competent jurisdiction where forfeitures of up to \$10,000 for each day the failure to comply continues until judgment is rendered. If you are licensed in other jurisdictions, you may be required to report this proceeding in those jurisdictions



**CERTIFICATE OF SERVICE**

The undersigned certifies that on this date a true and correct copy of the foregoing Findings of Fact, Conclusions of Law and Order was emailed to:

First Integrity Title Insurance Agency, LLC  
Attention: Monica DiGeronimo, Associate General Counsel  
[MDiGeronimo@firstintegritytitle.com](mailto:MDiGeronimo@firstintegritytitle.com)

and

Shelley A. Coudreaut  
Assistant Attorney General  
[sacoudreaut@agutah.gov](mailto:sacoudreaut@agutah.gov)

DATED this @ day of @, 2022.

/s/  
Jeanine Couser  
Utah Insurance Department  
4315 South 2700 West, Suite 2300  
Taylorsville, UT 84129  
801-957-9321

SHELLEY A. COUDREAUT (9663)  
Assistant Attorney General  
SEAN D. REYES (7969)  
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Salt Lake City, Utah 84114-0874  
Telephone: (801)366-0375  
Email: [sacoudreaut@agutah.gov](mailto:sacoudreaut@agutah.gov)

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**BEFORE THE UTAH INSURANCE COMMISSIONER**

UTAH INSURANCE DEPARTMENT,  Complainant,  vs.  FIRST INTEGRITY TITLE INSURANCE AGENCY, LLC.,  Respondent.	<b>COMPLIANCE WITH UTAH CODE § 31A-2-404(1)(b)(ii)</b>  Docket No. 2022-4439
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Pursuant to Utah Code § 31A-2-404(1)(b)(ii) the Utah Insurance Commissioner consulted with and sought the concurrence of the Title and Escrow Commission (“Commission”), in an open meeting, regarding the imposition of the penalty set forth in the Findings of Fact, Conclusions of Law and Order in this matter.

By a vote of 5 to 0, the Commission:

5 concurred

0 did not concur

with the imposition of the penalty.

Dated: 11-14, 2022.

  
Kim Holbrook, Chair  
Title and Escrow Commission

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**BEFORE THE UTAH INSURANCE COMMISSIONER**

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UTAH INSURANCE DEPARTMENT,

Complainant,

vs.

FIRST INTEGRITY TITLE INSURANCE  
AGENCY, LLC.,

Respondent.

**IMPOSITION OF PENALTY IN  
COMPLIANCE WITH UTAH CODE  
§ 31A-2-404(1)(b)(ii)**

Docket No. 2022-4439

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Pursuant to Utah Code § 31A-2-404(1)(b)(ii), I Jonathan T. Pike, Utah Insurance Commissioner consulted with and sought the concurrence of the Title and Escrow Commission, in an open meeting, regarding the imposition of the penalty set forth in the Findings of Fact, Conclusions of Law and Order in this matter. I hereby agree with and impose said penalty.

Dated: \_\_\_\_\_, 2022.

\_\_\_\_\_  
Jonathan T. Pike  
Utah Insurance Commissioner

**NOTICE**

Pursuant to Utah Code § 63G-4-203(1)(i) and Utah Admin. Code R590-160-8(1), an Order shall become final and take full effect, 15 days after the Notice of Agency Action and Order is emailed to Respondent unless a request for a hearing is received from Respondent prior to that date. A respondent's failure to timely request a hearing in an informal adjudicative proceeding will be considered a failure to exhaust administrative remedies pursuant to Utah Admin. Code R590-160-7(2).

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this date a true and correct copy of the foregoing  
Imposition of Penalty in Compliance with Utah Code § 31A-2-402(1)(b)(ii) were emailed to:

First Integrity Title Insurance Agency, LLC  
Attention: Monica DiGeronimo, Associate General Counsel  
[MDiGeronimo@firstintegritytitle.com](mailto:MDiGeronimo@firstintegritytitle.com)

and

Shelley A. Coudreaut  
Assistant Attorney General  
[sacoudreaut@agutah.gov](mailto:sacoudreaut@agutah.gov)

DATED this @day of @, 2022.

/s/  
Jeanine Couser  
Utah Insurance Department  
4315 S. 2700 W., Suite 2300  
Taylorsville, UT 84129  
801-957-9321

Approval Date	3rd Quarter Aug 2022 - Oct 2022 Approved Title Courses	Provider Name	Totals	Comments
<b>Aug-22</b>			<b>4</b>	
8/2/2022	Cyber Security - The Jungle that is Cyberspace	First American Title Ins. Co.		
8/10/2022	So You Want Us To Insure Your Easement	Fulghum		
8/19/2022	Sunny with a Chance of Fraud	First American Title Ins. Co.		
8/29/2022	Claims - Looks Can Be Revealing	First American Title Ins. Co.		
<b>Sep-22</b>			<b>20</b>	
9/5/2022	Threat Actors and the Evolution of Business Email Compromise	American Land Title Association		
9/5/2022	Getting To Yes: Tips for Submitting Approval Requests For Complex Issues	American Land Title Association		
9/5/2022	The Value of Integrating RON into Your Workflow	American Land Title Association		
9/5/2022	Navigating Commercial Liens	American Land Title Association		
9/5/2022	Claims-opoly: Best Practices to Avoid Title Claims in the Changing Economy	American Land Title Association		
9/5/2022	Entity Authority Issues for Commercial Transactions	American Land Title Association		
9/5/2022	Navigating FIRPTA	American Land Title Association		
9/5/2022	Cyber Security Best Practices	American Land Title Association		
9/5/2022	Riding the Commercial Real Estate Business Cycle	American Land Title Association		
9/5/2022	Regulatory Hot Topics	American Land Title Association		
9/5/2022	On the Horizon: How the New Rules of Data Privacy Can Impact	American Land Title Association		
9/5/2022	Moving Money at the Speed of Light	American Land Title Association		
9/5/2022	Digital Closings: How Far Have We Come and How Far Do We Have To Go	American Land Title Association		
9/7/2022	The Essentials of Section 1031 Exchanges	Doma Title Insurance Inc.		
9/8/2022	A Forensic Review of Escrow In Utah	Utah Land Title Association		
9/13/2022	Defending What Matters	Westcor Land Title Insurance Co.		
9/16/2022	Ethical Considerations, Fraud and Forgery	Fulghum		
9/20/2022	Title 101	Silver Leaf Title Insurance Agency		
9/29/2022	ALTA Forms Update	Westcor Land Title Insurance Co.		
9/29/2022	Ethical Responsibility of Title Agents	Westcor Land Title Insurance Co.		
<b>Oct-22</b>			<b>38</b>	
10/5/2022	Cyber Security - The Jungle that is Cyberspace	First American Title Insurance Co		
10/7/2022	2022 Claims and Ethics Refresher	Fulghum		
10/12/2022	Cannabis in Real Estate- Legal and Practical Considerations	Doma Title Insurance Inc.		
10/12/2022	Fighting Fraud Masterclass: Ripped from the Headlines	Doma Title Insurance Inc.		
10/12/2022	AU - Foreclosures	Old Republic National Title Ins. Co.		
10/13/2022	Tales of Title Terror	US Title Insurance Agency LLC		
10/13/2022	Title Policy Claims Chronicles - Class 1	US Title Insurance Agency LLC		

Approval Date	3rd Quarter Aug 2022 - Oct 2022 Approved Title Courses	Provider Name	Totals	Comments
<b>Oct-22</b>	<b>continued</b>			
10/14/2022	Ethical Responsibilities of Title Agents	Utah Land Title Association		
10/25/2022	Commercial Title & Escrow	Metro National Title		
10/25/2022	Assumptions and Seller Financing	Metro National Title		
10/27/2022	1031 Tax Deferred Exchanges	Chandler & Association LLC		
10/27/2022	Seller Financing	Chandler & Association LLC		
10/27/2022	Working With Builders	Chandler & Association LLC		
10/27/2022	Clearing Title to Real Property	Chandler & Association LLC		
10/27/2022	Contracts the Basics	Chandler & Association LLC		
10/27/2022	Covenants Conditions & Restrictions	Chandler & Association LLC		
10/27/2022	Death & Title	Chandler & Association LLC		
10/27/2022	Death, Debt & Divorce	Chandler & Association LLC		
10/27/2022	Deeds & Conveyancing of Real Property	Chandler & Association LLC		
10/27/2022	Easements: Legal & Practical Perspective	Chandler & Association LLC		
10/27/2022	Encumbering Real Property	Chandler & Association LLC		
10/27/2022	Entities & Authority Issues	Chandler & Association LLC		
10/27/2022	Flips, Flops & Assignments	Chandler & Association LLC		
10/27/2022	Foreclosures (1 hour)	Chandler & Association LLC		
10/27/2022	Foreclosure (2 hour)	Chandler & Association LLC		
10/27/2022	Goofy Ways to Screw Up Your Property Titles	Chandler & Association LLC		
10/27/2022	Judgments, Liens & Attachments on Real Property	Chandler & Association LLC		
10/27/2022	Legal Description, Easements, Boundaries & Surveys	Chandler & Association LLC		
10/27/2022	Mechanic' Liens	Chandler & Association LLC		
10/27/2022	Mortgages Trust Deeds & Contracts	Chandler & Association LLC		
10/27/2022	Ownership & Vesting of Real Property	Chandler & Association LLC		
10/27/2022	Short Sales	Chandler & Association LLC		
10/27/2022	Title Coverages	Chandler & Association LLC		
10/27/2022	Wire Fraud	Chandler & Association LLC		
10/27/2022	Searching & Examining Real Estate Title	Chandler & Association LLC		
10/27/2022	Understanding RESPA	Chandler & Association LLC		
10/27/2022	Bankruptcy & Real Estate Transaction	Chandler & Association LLC		
10/28/2022	Claims - Looks Can Be Revealing	First American Title Insurance Co		