

Lieutenant Governor

# **Insurance Department**

JONATHAN T. PIKE Insurance Commissioner

# **Title & Escrow Commission Meeting**

(https://insurance.utah.gov/licensees/title/tec/)

<u>Date:</u> July 14, 2025 <u>Place:</u> <u>In Person</u> <u>Virtual</u>
Taylorsville SOB Google Meet

Time: 9:00 AM 4315 S. 2700 W. meet.google.com/ubd-pzpq-tcw

Flaming Gorge Room 573-621-2430 Phone Taylorsville, UT 84129 594 064 849# Password

## **ATTENDEES**

TITLE & ESCROW COMMISSION

Chair, Nathan Sprague (Insurer, Utah County)

Vice Chair, Tina Williams (Agency, Juab County)

Kim Holbrook (Insurer, Davis County)

Jeff Mathews (Public, Morgan County)

Kevin Parke (Agency, Salt Lake County)

DEPARTMENT STAFF

Jon Pike, *Insurance Commissioner* Reed Stringham, *Deputy Comm*. Randy Overstreet, *Licensing Mgr.* Patrick Lee, *Finance Dir.* 

Patrick Lee, Finance Dir. Kelly Christensen, P&C Asst. Dir. Steve Gooch, PIO Recorder Jaimee George, Title Examiner

Tracy Klausmeier, P&C Dir.

## **AGENDA**

General Session: (Open to the Public)

- Welcome / Nathan Sprague, Chair
- Telephone Roll Call

Michael Covington, CE Specialist

- Swear in New Board Members / Jeanine Couser
  - o Kim Cruz
  - Doug Newell
- Thank Outgoing Members for Service / Reed
  - Kim Holbrook
  - Tina Williams
- Adopt Minutes of Previous Meeting
- Concurrence Reports / Nathan
  - Licenses
  - Penalties
    - Reltco of Utah LLC, Docket #2024-4681
    - Olga Sandoval, Docket #2025-4799
    - Secure Title Insurance Agency, Docket #2025-4813
    - P1 Title Insurance Agency LLC, Docket #2025-4814
    - True Concept Title, Docket #2025-4815
    - Endpoint Digital Closings LLC, Docket #2025-4822
  - Continuing education

- Update on 2025 Goals
  - o ULTA report / Kim
- Marketing Questions / Jaimee
  - o Q1: Notice of default homes and sign displays with a real estate office
  - o Q2: Parade of Homes booth clarification
- New Business
- Old Business
- Other Business
  - O Status of construction money rule / Matt/Cort
  - o Elect chair and vice chair
  - o Board member terms / Steve
    - Public member https://boards.utah.gov/s/board-seat/a028y000001ObX0AAK/seat13674
- Hot Topics

#### Executive Session (None)

- Adjourn
- Next Meeting: August 11, 2025 Flaming Gorge Room, Taylorsville State Office Building

#### **2025 Meeting Schedule**

<del>Jan 13**</del>	Feb 10**	<del>Mar 10</del>	Apr 14	May 12*	<del>Jun 9</del>
ONLINE	ONLINE	Flaming Gorge	Flaming Gorge	Flaming Gorge	Flaming Gorge
Jul 14	Aug 11	Sep 8	Oct 20*	Nov 10	Dec 8**
Flaming Gorge	Flaming Gorge	Flaming Gorge	Flaming Gorge	Flaming Gorge	ONLINE

<sup>\*</sup>Proposed TEC/REC meeting immediately following

#### 2025 Goals

- 1. Continue making sure continuing education and testing are relevant
- 2. Continue working with the Real Estate Commission
- 3. Continue working with the ULTA as a liaison
- 4. Increase awareness of cyber and wire fraud's effect on consumers and agencies
- 5. Increase awareness of affiliated business arrangements (ABA)
- 6. Increase consumer awareness of the role a title insurance company plays in a real estate transaction
- 7. Increase industry's awareness of the marketing rule and how to ask questions

<sup>\*\*</sup>Online only

# Title Agency Licensing Jun 2025

New licenses					
Agency ID	Name	Orig. Issue Date	Expire Date	LOA	
(none)					
Renewal Licenses					
Agency ID	Name	Orig. Issue Date	Expire Date	LOA	
203338	CHICAGO TITLE AGENCY OF UTAH, LLC	2023-06-14	2027-06-30	TE	
203338	CHICAGO TITLE AGENCY OF UTAH, LLC	2023-06-14	2027-06-30	TS	
6933	COALITION TITLE AGENCY	1989-06-21	2027-06-30	TE	
6933	COALITION TITLE AGENCY	1989-06-21	2027-06-30	TS	
16790	COVIUS TITLE INSURANCE AGENCY OF UTAH LLC	2007-06-20	2027-06-30	TE	
16790	COVIUS TITLE INSURANCE AGENCY OF UTAH LLC	2007-06-20	2027-06-30	TS	
166570	EAGLE GATE TITLE INSURANCE AGENCY, INC.	2011-06-15	2027-06-30	TE	
166570	EAGLE GATE TITLE INSURANCE AGENCY, INC.	2011-06-15	2027-06-30	TMR	
166570	EAGLE GATE TITLE INSURANCE AGENCY, INC.	2011-06-15	2027-06-30	TS	
6030	FARM AND HOME TITLE INSURANCE AGENCY INC	1997-06-06	2027-06-30	TE	
6030	FARM AND HOME TITLE INSURANCE AGENCY INC	1997-06-05	2027-06-30	TS	
178484	INVICTUS TITLE INSURANCE AGENCY, LLC	2015-06-15	2027-06-30	TE	
178484	INVICTUS TITLE INSURANCE AGENCY, LLC	2015-06-15	2027-06-30	TS	
178387	NOVATION TITLE INSURANCE AGENCY	2015-06-04	2027-06-30	TE	
178387	NOVATION TITLE INSURANCE AGENCY	2018-01-02	2027-06-30	TS	
197823	PROSPECT TITLE INSURANCE AGENCY, LLC	2021-06-28	2027-06-30	TE	
197823	PROSPECT TITLE INSURANCE AGENCY, LLC	2021-06-28	2027-06-30	TS	
Lapsed Licenses					
Agency ID	Name	Orig. Issue Date	Expired Date	LOA	
(none)					
Reinstated Licenses					
Agency ID	Name	Orig. Issue Date	Expire Date	Reinstated	LOA
16784	ORANGE TITLE INSURANCE AGENCY	2007-06-18	2026-11-30	2025-06-13	TS

# Title Agent Licensing Jun 2025

New Licenses				
	Name	Orig Issue Date	Evniro Data	LOA
Agent ID		<b>Orig. Issue Date</b> 2025-06-20	<b>Expire Date</b> 2028-01-31	TE
2178057	GEORGE, CRYSTAL			
2165547	MADISON, OSCAR	2025-06-06	2028-04-30	TS
2179026	ROMERO, LUKAS	2025-06-30	2027-06-30	TMR
2177774	SHOELL, KAMILLE	2025-06-18	2027-10-31	TMR
2177180	STONE, MAX	2025-06-06	2027-10-31	TS
2176735	STUBBS, WILLIAM	2025-06-09	2027-11-30	TS
Renewed Licenses				
	Name	Orig Issue Date	Evniro Data	LOA
<b>Agent ID</b> 1588880		Orig. Issue Date 2014-11-17	<b>Expire Date</b> 2027-06-30	TE
	ANDREWSEN, KURT			
1589381	AOKI, NICOLE	2014-11-18	2027-06-30	TE
97397	ARMSTRONG, MEGAN	2016-05-25	2027-06-30	TS
97397	ARMSTRONG, MEGAN	2004-01-06	2027-06-30	TE
79147	ARVESETH, BRENT	2014-05-08	2027-06-30	TMR
27490	BARTLETT, JON	1984-11-09	2027-06-30	TE
27490	BARTLETT, JON	1984-11-09	2027-06-30	TS
1588349	BETTOLO, SHELLEY	2014-11-17	2027-06-30	TE
1882040	BREMS, LIESL	2020-07-02	2027-06-30	TE
14520	BROWN, RON	1996-04-29	2026-04-30	TS
1616636	BUNKER, DANIELLE	2015-06-09	2027-06-30	TE
90776	BUTTERFIELD, VALERIE	2003-06-04	2027-06-30	TS
90776	BUTTERFIELD, VALERIE	2013-09-16	2027-06-30	TE
114453	CESPEDES, JOSE	2005-06-07	2027-06-30	TE
105542	CRAVENS, SCOTT	2004-09-09	2027-06-30	TS
109933	DEVORE, AMY	2005-01-26	2027-06-30	TS
109933	DEVORE, AMY	2008-02-13	2027-06-30	TE
1348492	DUNFORD, NATHAN	2009-06-02	2027-06-30	TE
53600	GREENING, TAMARA	1994-06-21	2027-06-30	TE
90457	GRESSMEN, CHERRI	2003-05-23	2027-06-30	TMR
39812	GUSTAFSON, DAVID	1992-03-18	2027-06-30	TS
39812	GUSTAFSON, DAVID	1992-03-18	2027-06-30	TE
1617257	HALVORSEN, DALTON	2015-06-25	2027-06-30	TS
1617257	HALVORSEN, DALTON	2016-12-22	2027-06-30	TE
10155	HANLON, PAMELA	1997-12-22	2026-05-31	TE
10155	HANLON, PAMELA	1997-12-22	2026-05-31	TS
1592762	HATCH, CATHERINE	2014-12-18	2027-06-30	TS
1592762	HATCH, CATHERINE	2014-12-18	2027-06-30	TMR
1592762	HATCH, CATHERINE	2014-12-18	2027-06-30	TE
112174	HILL, SHAUNIE	2019-01-25	2027-06-30	TE
112174	HILL, SHAUNIE	2005-03-31	2027-06-30	TMR
112177	THEE, OF IAONIE	2000 00-01	2027 00-00	11/111

#### **Renewed Licenses**

Agent ID Name		Orig. Issue Date	Expire Date	LOA
2070815 JOHNSO	N, DENNISE	2023-01-06	2027-06-30	TS
32508 JOHNSOI	N, DAVID	1993-05-05	2027-06-30	TE
32508 JOHNSOI	N, DAVID	1993-04-07	2027-06-30	TS
1704118 KIDMAN,	BRANDON	2017-04-10	2027-06-30	TE
1704118 KIDMAN,	BRANDON	2017-04-10	2027-06-30	TS
1704118 KIDMAN,	BRANDON	2017-04-10	2027-06-30	TMR
36298 LUNDBEI	RG, J	1992-11-25	2027-06-30	TS
36298 LUNDBEI	RG, J	1992-11-25	2027-06-30	TE
1795928 MARTIN,	KENNALEE	2018-12-18	2027-06-30	TE
1921193 MARTINS	ON, KENADEE	2023-01-06	2027-06-30	TE
1921193 MARTINS	ON, KENADEE	2020-12-29	2027-06-30	TMR
82710 MAUCHL	EY, JILL	2003-03-27	2027-06-30	TS
34218 MECHAM	I, BONNIE	1998-08-31	2027-06-30	TS
1708491 MELTZER	, MELISSA	2017-05-19	2027-06-30	TE
45007 MERRILL	, MARTIN	1982-06-17	2027-06-30	TE
45007 MERRILL	, MARTIN	1982-06-17	2027-06-30	TS
1817198 MILLER, I	PHILLIP	2019-05-02	2027-06-30	TE
86137 MOTZKUS	S, RONALD	2003-01-27	2027-06-30	TMR
1559597 Mitchell,	Amanda	2015-03-09	2027-06-30	TE
36659 OGDEN,	MERRILL	1985-03-22	2027-06-30	TS
36659 OGDEN,	MERRILL	1985-03-22	2027-06-30	TE
42392 OLSEN, E	DEBRA	1995-03-24	2027-06-30	TS
106103 OSTLER,	RYAN	2004-09-28	2027-06-30	TE
81290 PARKER,	RAYNEE	2002-09-12	2027-06-30	TE
134358 PUTNAM	, EVELYN	2006-09-21	2027-06-30	TE
106205 RENGERS	S, JAMIE	2004-09-30	2027-06-30	TE
106205 RENGERS	S, JAMIE	2004-09-30	2027-06-30	TS
36507 SAFFORE	), C	2000-01-13	2027-06-30	TMR
1926122 SCHEID,	JARRAN	2023-05-17	2027-06-30	TE
44836 SIDDOW	AY, DAWN	1986-04-04	2027-06-30	TS
44836 SIDDOW	AY, DAWN	1986-04-04	2027-06-30	TE
1942472 SMITH, A	LAINA	2021-04-09	2027-06-30	TE
1942472 SMITH, A	LAINA	2022-07-20	2027-06-30	TS
108159 SMITH, JO	OHN	2004-12-01	2027-06-30	TMR
45595 SMITH, S	HELDON	2018-05-04	2027-06-30	TE
114564 SMITH, A	SHLIE	2005-06-08	2027-06-30	TE
45595 SMITH, S	HELDON	1998-07-23	2027-06-30	TS
45330 STANLEY	, DOUGLAS	1985-06-20	2027-06-30	TS
2055528 STEARNS	, LORI	2022-11-14	2027-06-30	TE
1598306 STEED, S	PENCER	2015-01-27	2027-06-30	TE
1460825 STEPHEN	IS, CHRISTINE	2011-06-27	2027-06-30	TMR
1460825 STEPHEN	IS, CHRISTINE	2024-07-09	2027-06-30	TE

Renewed Licenses				
Agent ID	Name	Orig. Issue Date	<b>Expire Date</b>	LOA
26587	TAYLOR, WADE	1994-08-18	2027-06-30	TS
26587	TAYLOR, WADE	2003-02-21	2027-06-30	TE
1389647	UTLEY, RYAN	2010-04-16	2027-06-30	TS
1389647	UTLEY, RYAN	2010-04-16	2027-06-30	TE
137901	VROTNEY, BRITTANY	2006-12-28	2027-06-30	TE
131305	WOOLSEY, HEATHER	2006-07-12	2027-06-30	TE
1429742	Wilkey, Jacey	2010-10-18	2027-06-30	TE
94360	ZOUMBERAKIS, MARY	2003-09-23	2027-06-30	TE
Lapsed Licenses				
Agent ID	Name	Orig. Issue Date	<b>Expired Date</b>	LOA
2044709	DORNBUSCH, SARAH	2022-08-10	2025-05-31	TMR
39900	HOLMSTEAD, VICKIE	1990-06-21	2025-05-31	TE
132014	HOUSEAL, BRUCE	2006-08-02	2025-05-31	TS
2037020	HUDSON, JENNIFER	2022-06-22	2025-05-31	TMR
37568	HUNSAKER, DEON	1990-07-11	2025-05-31	TS
37568	HUNSAKER, DEON	1990-07-11	2025-05-31	TE
45878	MC MILLEN, KENT	1988-04-27	2025-05-31	TS
45878	MC MILLEN, KENT	1988-04-27	2025-05-31	TE
1798150	MYERS, KATHLEEN	2018-12-06	2025-05-31	TS
2071771	NEBEKER, CHEYENE	2023-03-03	2025-05-31	TE
39136	NIELSON, MICHAEL	1991-01-09	2025-05-31	TS
33539	PAY, PHILLIP	2015-07-09	2025-05-31	TE
70420	PEHRSON, KRYSTA	2004-11-29	2025-05-31	TS
70420	PEHRSON, KRYSTA	2001-10-17	2025-05-31	TMR
70420	PEHRSON, KRYSTA	2002-07-29	2025-05-31	TE
85778	PENMAN, DANIEL	2003-01-14	2025-05-31	TS
Reinstated Licenses				

Agent ID	Name	Orig. Issue Date	Expire Date	Reinstated	LOA
1842236	DEHAAS, SHELBY	2019-10-29	2026-09-30	2025-06-03	TE
1572805	HALVORSEN, COLTON	2016-04-15	2026-06-30	2025-06-03	TE
1922038	REDDING, MADDI	2021-01-15	2027-05-31	2025-06-09	TE

HELEN A. FROHLICH #8814
Assistant Attorney General
DEREK E. BROWN #10476
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: hfrohlich@agutah.gov

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT, NOTICE OF AGENCY ACTION AND ORDER

Complainant,

VS.

RELTCO OF UTAH LLC, Docket No. 2024-4681

Respondent. Donald H. Hansen
Administrative Law Judge/Presiding Officer

## **NOTICE OF AGENCY ACTION**

The Utah Insurance Department (the "Department") commences this agency action as an informal adjudicative proceeding against Respondent Reltco of Utah LLC ("Respondent") pursuant to Utah Code §§ 31A-2-201 and 63G-4-201 through -203, and to Utah Admin. Code R590-160.

This agency action is based on the facts and law set forth in the attached Declaration and is designated as an informal adjudicative proceeding pursuant to Utah Code § 63G-4-202(1) and Utah Admin Code R590-160-4 and -7.

**ORDER** 

Based on the facts and the law set forth in the attached Declaration, and good cause

appearing, the Utah Insurance Commissioner orders as follows:

1. Respondent's resident producer organization license number 536580 is revoked.

2. Pursuant to Utah Code § 63G-4-203(1)(i) and Utah Admin. Code R590-160-7(1), this

informal adjudicative proceeding shall be closed, and this Order shall become final and take full

effect, 15 days after this Notice of Agency Action and Order is emailed to Respondent unless a

request for a hearing on this matter is received from Respondent prior to that date.

3 A request for a hearing shall be in writing and sent by email to

uidadmincases@utah.gov or by U.S. mail to Office of the Administrative Law Judge, Utah

Insurance Department, 4315 S. 2700 W., Taylorsville, UT 84129.

4. The request for hearing shall state the basis for the relief requested.

5. If you fail to request a hearing you will be bound by this Order. Failure to request a

hearing is a failure to exhaust administrative remedies and precludes any further administrative

or judicial review or appeal of this matter.

DATED this 7<sup>th</sup> day of January 2025.

JONATHAN T. PIKE

**Utah Insurance Commissioner** 

/s/ Donald H. Hansen

DONALD H. HANSEN

Administrative Law Judge/Presiding Officer

Utah Insurance Department

4315 S. 2700 W., Suite 2300

Taylorsville, UT 84129

Telephone: (801) 957-9321

Email: uidadmincases@utah.gov

2

## NOTICE REGARDING ENFORCEMENT OF THE ORDER

Failure to obey the Order may subject you to further penalties that include a forfeiture of up to \$5,000 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 to those jurisdictions.

## **DECLARATION**

Under criminal penalty of Utah law, I, Jaimee George, declare the following:

- 1. I am currently employed as a Title Market Conduct Examiner/Auditor with the Utah Insurance Department ("Department") where my responsibilities include investigating and enforcing Utah insurance laws.
- 2. I submit this Declaration as the basis for issuing the Notice of Agency Action and Order against Reltco of Utah LLC ("Respondent") to which this Declaration is attached.
- 3. Based on my personal knowledge and/or based on the facts appearing in the Department's records and files, the following facts are true:
  - a. Respondent holds resident producer agency license number 536580.
- b. Respondent allowed its license to lapse between August 31, 2023 and September 12,
   2023. When its license lapsed, Respondent's appointments and affiliations to title insurers were cancelled.
- c. Respondent conducted settlements and closings when it did not hold an affiliation or appointment with an underwriter.
- d. In addition, Respondent conducted settlements/closings for the UWM Trac Loan

  Program in which it accepted an Attorney Opinion Letter in lieu of a lender's policy.
- e. The Respondent failed to have a properly licensed agent managing its office between September 30, 2023, and July 27, 2024.
- f. Respondent does not have a physical office, open to the public and staffed during regular business hours on regular business days, in the State of Utah.
- g. On December 2, 2024, a forfeiture of \$750.00 was assessed against Respondent, to be paid in full to the Department within 30 days. *See* Utah Insurance Department vs. Reltco of Utah

LLC, Docket No. 2024-4655.

h. Respondent failed to pay the forfeiture assessed in Docket No. 2024-4655 within 30

days.

4. The above declared facts demonstrate that the following Utah insurance law(s) were

not complied with:

a. Respondent violated Utah Code § 31A-23a-406(2)(b), by failing to maintain

appointments or affiliations with title insurers;

b. Respondent violated Utah Code § 31A-23a-406(2)(c)(ii) by accepting an Attorney

Opinion Letter in lieu of a lender's policy;

c. Respondent violated Utah Code § 31A-23a-204(1)(c)(i)(ii) by failing to have a

properly licensed individual own or manage the agency;

d. Respondent violated Utah Code §§ 31A-23a-406(2)(i) and 31A-1-301(16) by failing

to maintain a physical office in Utah staffed by a person with an escrow subline of

authority; and

e. Respondent violated Utah Code § 31A-2-201 by failing to pay the forfeiture ordered in

Docket No. 2024-4655 within 30 days.

5. Based on Utah Code § 31A-2-308 and other similar enforcement cases, Respondent's

resident producer organization license number 536580 should be revoked.

Signed on this 6<sup>th</sup> day of January 2025 in Salt Lake City, Salt Lake County, State of Utah.

/s/ Jaimee George

Jaimee George

Title Market Conduct Examiner/Auditor

**Utah Insurance Department** 

5

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date a true and correct copy of the foregoing

Notice of Agency Action and Order, with the Declaration attached to it, was emailed to:

Stephenie Kilpatrick Reltco of Utah LLC 7453 South Shay Lane South Weber, UT 84405 dcole@reltco.com

and

Helen A. Frohlich Assistant Attorney General hfrohlich@agutah.gov

DATED this 7<sup>th</sup> day of January 2025.

/s/ Jeanine Couser

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

#### BEFORE THE UTAH INSURANCE COMMISSIONER

#### UTAH INSURANCE DEPARTMENT,

Complainant,

VS.

#### RELTCO OF UTAH, LLC,

Respondent.

## ORDER DISMISSING REQUEST FOR HEARING AND AFFIRMING AGENCY ACTION

Docket No. 2024-4681

Donald H. Hansen Administrative Law Judge/Presiding Officer

On January 15, 2025, Reltco of Utah, LLC (Respondent) filed a timely request for a hearing regarding the Utah Insurance Department's (Department) Notice of Agency Action dated January 7, 2025. In its Notice of Agency Action, the Department sought to revoke Respondent's Utah resident producer organization license, number 536580.

On Wednesday, February 19, 2025, pursuant to notice, a telephonic prehearing conference was conducted in the above-entitled matter. At that time, all parties appeared telephonically and a Scheduling Order was generated, with the parties agreeing to various dates and deadlines, including a date for an evidentiary hearing. Immediately following the prehearing conference, a Scheduling Order was issued, including a setting for an evidentiary hearing (trial) to be conducted on Friday, March 21, 2025, at 9:00 a.m. MDT, by electronic video conference (Google Meet).

On March 21, 2025, at 9:00 a.m. MDT, the evidentiary hearing was opened. However, the Respondent failed to appear. Appearing for the Department was Helen A. Frohlich, Esq.,

Assistant Utah Attorney General, and Jaimee George, Market Conduct Examiner. Respondent did not appear, even after the Presiding Officer waited an additional fifteen minutes for Respondent to join the hearing. Before the hearing, Respondent had not advised either the Department's counsel or the Presiding Officer that it would not appear for the evidentiary hearing, nor did it seek a continuance.

Based upon the foregoing, the Presiding Officer enters the following Order.

#### **ORDER**

- 1. Inasmuch as the Respondent failed to attend the evidentiary hearing and did not request a continuance thereof, Respondent's request for hearing is DISMISSED.
- 2. The Department's Notice of Agency Action, dated January 7, 2025, revoking Respondent's insurance license, is AFFIRMED.

DATED this 21st day of March 2025.

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

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date a true and correct copy of the foregoing

# ORDER DISMISSING REQUEST FOR HEARING AND AFFIRMING AGENCY

**ACTION** was emailed to:

Dani Cole Reltco of Utah LLC dcole@reltco.com

Helen A. Frohlich Assistant Attorney General hfrohlich@utah.gov

DATED this 21st day of March 2025

/s/ Jeanine Couser

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

#### Right to Agency Review

Any party may request agency review of an order in an adjudicative proceeding within 30 days of the date of the order to be reviewed. The request should be sent to <a href="mailto:uidadmincases@utah.gov">uidadmincases@utah.gov</a>. Utah Insurance Department Rule R590-160-8 provides as follows:

- (1)(a) Agency review of an adjudicative proceeding, except an informal adjudicative proceeding that becomes final without a request for a hearing under Subsection R590-160-7(1), is available to a party to a proceeding by filing a request for agency review with the commissioner within 30 days of the date of the order.
- (b) Failure to seek agency review is a failure to exhaust administrative remedies.
- (2) Agency review shall comply with Section 63G-4-301.
- (3)(a) The commissioner or the commissioner's designee shall conduct the review.
- (b) A designee may not be the presiding officer who issued the decision under review.
- (c) If a designee conducts a review, the designee shall recommend a disposition to the commissioner.
- (d) The commissioner will make the final decision and sign the order.
- (4) Content of a request for agency review.
- (a) A request for agency review shall comply with Subsection 63G-4-301(1)(b), and shall include the following:
- (i) a copy of the order that is the subject of the request;
- (ii) the factual basis for the request, including:
- (A) citation to the record of the formal adjudicative proceeding; and
- (B) clear reference to evidence or a proffer of evidence in an informal adjudicative proceeding;
- (iii) the legal basis for the request, including citation to supporting authority;
- (iv) for a challenge to a finding of fact in a formal adjudicative proceeding, the reason that the finding is not supported by substantial evidence based on the entire record; and
- (v) for a challenge to a finding of fact in an informal adjudicative proceeding, the reason that the finding is not supported by substantial evidence based on the evidence received or proffered.
- (b) A party challenging a finding of fact in a formal adjudicative proceeding shall:
- (i) order a transcript of the recording relevant to the finding;
- (ii) certify that a transcript is ordered;
- (iii) file the transcript with the commissioner or the commissioner's designee;
- (iv) serve a copy of the transcript on each party; and
- (v) pay the cost of preparing the transcript.
- (c) The commissioner or commissioner's designee may waive the transcript requirement on motion for good cause shown.
- (5) Memoranda.
- (a)(i) A party requesting agency review shall submit a supporting memorandum with the request.
- (ii) If a transcript is necessary to conduct agency review, a supporting memorandum shall be filed no later than 15 days after the service of the transcript on the opposing party.
- (b) An opposing memorandum shall be filed no later than 15 days after the supporting memorandum is filed.
- (c) A reply memorandum shall be filed no later than five days after the opposing memorandum is filed.

- (d) The commissioner or the commissioner's designee may order a party to submit additional memoranda to assist in conducting agency review.
- (6) Request for a stay.
- (a) On motion by a party and for good cause, the commissioner or commissioner's designee may stay the presiding officer's order during the pendency of agency review.
- (b) A motion for a stay shall be made in writing and may be made at any time during the pendency of agency review.
- (c) An opposition to a motion for a stay shall be made in writing within ten days from the date the motion is filed.
- (7)(a) A party may request oral argument in the party's initial pleading.
- (b) The commissioner or the commissioner's designee may grant oral argument if requested in a party's initial pleading.
- (8) Failure to comply with Section R590-160-8 may result in the commissioner or the commissioner's designee dismissing the request for agency review.

SHELLEY A. COUDREAUT (9663)

Assistant Attorney General

DEREK E. BROWN (10476)

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

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT, NOTICE OF AGENCY ACTION AND CEASE AND DESIST ORDER

Complainant,

vs. Docket No. 2025-4799

OLGA SANDOVAL,

Donald H. Hansen

Respondent.

Administrative Law Judge/Presiding Officer

COMES NOW, Jonathan T. Pike, Utah Insurance Commissioner ("Commissioner"), through his presiding officer, and in support of this Cease and Desist Order states:

### **JURISDICTION**

Pursuant to Utah Code § 31A-2-201(4)(a), the Commissioner shall issue prohibitory orders to secure compliance with Utah Code, Title 31A. Pursuant to Utah Code § 31A-1-105(2), any person purporting to do an insurance business is subject to the jurisdiction of the Commissioner.

Based upon the investigation and file information of the Utah Insurance Department ("Department"), the Commissioner, through his presiding officer, makes and enters the following:

#### **FINDINGS OF FACT**

- 1. Olga Sandoval("Respondent") is an unlicensed individual who previously held Utah resident producer individual title escrow license, number 205046.
  - 2. Respondent's mailing address is
- 3. On October 3, 2021, Respondent pled guilty to one (1) count of Unlawful Dealing of Property By a Fiduciary, a 3<sup>rd</sup> Degree felony. (See State of Utah vs. Olga Sandoval, Case # 211904879, third Judicial District-Salt Lake County District Court, Salt Lake County, State of Utah).
- 4. On February 14, 2023, Respondent surrendered her Utah resident license in lieu of administrative action. As part of the surrender in lieu agreement with the Department, Respondent agreed not to apply for a new Utah insurance license for five years from the date of the surrender.
- 5. Pursuant to Utah Code § 31A-23a-111(5)(b)(xxv) and 18 U.S.C. § 1033(e)(2), Respondent's guilty plea to Unlawful Dealing of Property By a Fiduciary, a Third Degree Felony, qualifies as a felony conviction involving dishonesty or breach of trust, requiring the Respondent to obtain written consent from the Commissioner to engage or participate in the business of insurance, including activities incidental to the business of insurance.
- 6. Pursuant to R.590-281-4(5)(c)(ii), an application for written consent is required even if a felony conviction involving dishonesty or breach of trust has been reduced to a lower degree of offense under Section 76-3-402.
- 7. Respondent currently is, or recently has been, working in the insurance industry at numerous agencies including OnRecord Title and Gateway Title, in violation of 18 U.S.C. Sec. 1033 and Utah Code §§ 31A-23a-111(5)(b) (xxv).

#### **CONCLUSIONS OF LAW**

- 1. Utah Code § 31A-23a-111(5)(b), authorizes the Commissioner to act in compliance with the Violent Crime Control and Law Enforcement Act of 1994, 18 U.S.C. §1033.

  Respondent having been convicted of a felony involving dishonesty or breach of trust and having failed to obtain from the Commissioner the required written consent to engage or participate in the business of insurance, Respondent is prohibited from engaging in the business of insurance pursuant to Utah Code § 31A-23a-111(5)(b)(xxv) and 18 U.S.C. § 1033(e)(2).
- 2. Utah Code § 31A-23a-111(5)(b)(xxv), requires an individual who has been convicted of any criminal felony involving dishonesty or breach of trust to obtained written consent to engage in the business of insurance or participate in such business as required by 18 U.S.C. Sec. 1033.
- 3. Utah Admin. Code R.590-281-4(5)(a)(i), requires an individual who, under 18 U.S.C. Sec. 1033 has been convicted of a felony involving dishonesty or breach of trust to obtain written consent from the commissioner to engage or participate in the business of insurance. Written consent is required even if a felony conviction involving dishonesty or breach of trust has been reduced to a lower degree of offense under Utah Code § 76-3-402.

#### **ORDER**

Based upon the foregoing Findings of Fact and Conclusions of Law, it is hereby ordered that:

- 1. Respondent, Olga Sandoval, shall immediately Cease and Desist from engaging in the business of insurance in Utah, by and through any means, including any and all activities incidental to the business of insurance.
  - 2. Respondent is not eligible to apply for written consent from the Commissioner to

engage or participate in the business of insurance until after February 14, 2028.

3. During this period, Respondent shall not engage in or attempt or profess to engage

in any transaction or business for which a license or appointment is required under the Utah

Insurance Code or directly or indirectly own, control, or be employed in any manner by any

insurance agent or agency or adjuster or adjusting firm.

4. Pursuant to Utah Code § 63G-4-203(1)(i) and Utah Admin. Code R.590-160-7(1),

this Order shall become final and take full effect, 15 days after this Order is emailed to

Respondent unless a request for a hearing on this matter is received from Respondent prior to

that date.

5. A request for a hearing shall be in writing and sent by email to

uidadmincases@utah.gov or by U.S. mail to Office of the Administrative Law Judge, Utah

Insurance Department, 4315 S. 2700 W., Suite 2300, Taylorsville, UT 84129.

6. The request for hearing shall state the basis for the relief requested.

7. Failure to request a hearing will be deemed a failure to exhaust administrative

remedies and will preclude any further administrative or judicial review or appeal of this matter.

DATED this 8<sup>th</sup> day of May 2025.

JONATHAN T. PIKE

**Utah Insurance Commissioner** 

/s/ Donald H. Hansen

DONALD H. HANSEN

Administrative Law Judge/Presiding Officer

Utah Department of Insurance

4315 S. 2700 W., Suite 2300

7313 B. 2700 W., Build 230

Salt Lake City, UT 84129

Telephone (801) 957-9321

Telephone (601) 731 73

Email: <u>uidadmincases@utah.gov</u>

4

## NOTICE REGARDING ENFORCEMENT OF THE ORDER

Failure to obey the 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 being 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 to those jurisdictions.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date a true and correct copy of the foregoing

Cease and Desist Order and Declaration of Jaimee George was emailed to:

Olga Sandoval



and

Jaimee George Utah Insurance Department 4315 S. 2700 W., Suite 2300 Salt Lake City, UT 84129 jaimeegeorge@utah.gov

DATED this 8<sup>th</sup> day of May 2025.

/s/ Tatiana Karaivanova

Tatiana Karaivanova Utah Insurance Department 4315 S. 2700 W., Suite 2300 Salt Lake City, UT 84121 Telephone (801) 957-9321 SHELLEY A. COUDREAUT (9663)

Assistant Attorney General

DEREK E. BROWN (10476)

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

## BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,

Complainant,

vs.

Docket No. 2025-4799

OLGA SANDOVAL,

Respondent.

Donald H. Hansen
Administrative Law Judge/Presiding Officer

Under criminal penalty of Utah law, I, Jaimee George, declare the following:

- 1. I am currently employed as a Market Conduct Examiner with the Utah Insurance
  Department ("Department") where my responsibilities include investigating and enforcing Utah
  insurance laws.
- 2. I submit this Declaration as the basis for issuing the Notice of Agency Action and Order against Olga Sandoval ("Respondent") to which this Declaration is filed contemporaneously.
- 3. Based on my personal knowledge and/or based on the facts appearing in the Department's records and files, the following facts are true:
- a. Olga Sandoval ("Respondent") is an unlicensed individual who previously held Utah resident producer individual license, number 205046.

- b. Respondent's mailing address is
- c. On October 3, 2021, Respondent pled guilty to one (1) count of Unlawful Dealing of Property By a Fiduciary, a 3rd Degree felony. (See State of Utah vs. Olga Sandoval, Case # 211904879, third Judicial District-Salt Lake County District Court, Salt Lake County, State of Utah).
- d. On February 14, 2023, Respondent surrendered her Utah resident license in lieu of administrative action. As part of the surrender in lieu agreement with the Department, Respondent agreed not to apply for a new Utah insurance license for five years from the date of the surrender.
- e. Pursuant to Utah Code § 31A-23a-111(5)(b)(xxv) and 18 U.S.C. § 1033(e)(2), Respondent's guilty plea to Unlawful Dealing of Property By a Fiduciary, a Third Degree Felony, qualifies as a felony conviction involving dishonesty or breach of trust, requiring the Respondent to obtain written consent from the Commissioner to engage or participate in the business of insurance, including activities incidental to the business of insurance.
- f. Pursuant to R.590-281-4(5)(c)(ii), an application for written consent is required even if a felony conviction involving dishonesty or breach of trust has been reduced to a lower degree of offense under Section 76-3-402.
- g. The Department learned that Respondent currently is, or recently has been, working in the insurance industry at numerous agencies including OnRecord Title and Gateway Title, in violation of 18 U.S.C. Sec. 1033 and Utah Code §§ 31A-23a-111(5)(b) (xxv).
- h. Utah Code § 31A-23a-111(5)(b), authorizes the Commissioner to act in compliance with the Violent Crime Control and Law Enforcement Act of 1994, 18 U.S.C. §1033.

  Respondent having been convicted of a felony involving dishonesty or breach of trust and having failed to obtain from the Commissioner the required written consent to engage or participate in the business of insurance, Respondent is prohibited from engaging in the business of insurance

pursuant to Utah Code § 31A-23a-111(5)(b)(xxv) and 18 U.S.C. § 1033(e)(2).

Signed on this 7<sup>th</sup> day of May 2025, in Salt Lake City, Salt Lake County, State of Utah.

/s/ Jaimee George
Jaimee George, Market Conduct Examiner Utah Insurance Department

SHELLEY A. COUDREAUT (9663)

**Assistant Attorney General** 

**DEREK E. BROWN** (10476)

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: <a href="mailto:sacoudreaut@agutah.gov">sacoudreaut@agutah.gov</a>

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,

Complainant,
vs.

Docket No. 2025-4813

SECURE TITLE INSURANCE
AGENCY,
Respondent.

Donald H. Hansen
Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") commences this agency action as an informal adjudicative proceeding for entry of Findings of Fact, Conclusions of Law, and Order to which the Department and Secure Title Insurance Agency have stipulated. Filed contemporaneously with this Notice of Agency Action are the parties' Stipulation and their proposed Findings of Fact, Conclusions of Law, and Order.

The legal authority and jurisdiction under which the proceeding is maintained is

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Utah Code §§ 31A-2-201 and 63G-4-201 through 203 and Utah Admin. Code R.590-160.

# DATED this 10<sup>th</sup> day of June 2025

## 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 Telephone: 801-957-9321

Email: uidadmincases@utah.gov

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on this date a true and correct copy of the foregoing Notice of Agency Action was electronically mailed to:

Secure Title Insurance Agency 7985 South 700 East Sandy, UT 84070-0256 <a href="mailto:stephenie@securetitle.com">stephenie@securetitle.com</a>

and

Shelley A. Coudreaut Assistant Attorney General sacoudreaut@agutah.gov

DATED this \_\_\_\_\_ day of June 2025.

Utah Insurance Department 4315 South 2700 West, Suite 2300 Taylorsville, UT 84129 801-957-9321 SHELLEY A. COUDREAUT (9663)

Assistant Attorney General

**DEREK E. BROWN (10476)** 

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

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT, FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Complainant,

VS.

Docket No. 2025-4813

SECURE TITLE INSURANCE AGENCY,

Respondent. Donald H. Hansen

Administrative Law Judge/Presiding Officer

Complainant, Utah Insurance Department ("Department") and Respondent, Secure Title Insurance Agency, ("Respondent"), have stipulated to entry of the following Findings of Fact, Conclusions of Law, and Order, solely for purposes of resolving this matter.

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, authorized to do the business of insurance in Utah under license number 849822.
  - 2. Respondent's mailing address is 7985 South 700 East, Sandy, UT 84070-0256.
  - 3. Pursuant to Utah Code § 31A-23a-413 and Utah Admin. Code R.592-11-3(1), an

agency title insurance producer shall annually file with the Commissioner, by May 1<sup>st</sup> of each year, a verified statement of the agency title insurance producer's financial condition, transactions, and affairs ("annual report") as of the end of the preceding calendar year.

- 4. The Respondent failed to meet the May 1<sup>st</sup> deadline, submitting its annual report 12 days late, on May 12, 2025.
- 5. As a result of the Respondent's violations, the Department and Respondent have agreed to an administrative forfeiture of \$500.

#### **CONCLUSIONS OF LAW**

- 1. The Utah Insurance 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. Pursuant to Utah Code 31A-23a-413 and Utah Admin. Code R.592-11-3(1), an agency title insurance producer shall annually file with the Commissioner, by May 1<sup>st</sup> of each year, a verified statement of the agency title insurance producer's financial condition, transactions, and affairs ("annual report") as of the end of the preceding calendar year.
- 4. Respondent violated Utah Code § 31A-23a-413 and Utah Admin. Code R.592-11-3(1), when it failed to file its annual report with the Commissioner, by May 1, 2025.
- 5. As a penalty for the violations in this case, the Respondent should be ordered to pay a forfeiture of \$500.

#### **ORDER**

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

- Respondent shall pay a forfeiture of \$500 for the violation described in the
   Conclusions of Law. The forfeiture shall be paid in full to the Department no later than thirty
   (30) days after this order is signed.
- 2. Respondent is ordered not to commit the violations described in the Conclusions of Law in the future.

DATED this 10<sup>th</sup> day of June 2025

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: <u>uidadmincases@utah.gov</u>

### **NOTICE TO RESPONDENT**

Failure to obey this Order may subject you to further penalties that include a forfeiture of up to \$5,000 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 being 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 electronically mailed to:

Secure Title Insurance Agency 7985 South 700 East Sandy, UT 84070-0256 stephenie@securetitle.com

and

Shelley A. Coudreaut Assistant Attorney General sacoudreaut@agutah.gov

DATED this \_\_\_\_\_ day of June 2025.

Utah Insurance Department 4315 South 2700 West, Suite 2300 Taylorsville, UT 84129 801-957-9321 SHELLEY A. COUDREAUT (9663)

Assistant Attorney General

DEREK E. BROWN (10476)

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

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,

**STIPULATION** 

Complainant,

VS.

Docket No. 2025-4813

SECURE TITLE INSURANCE AGENCY,

Respondent.

Donald H. Hansen Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") and Respondent Secure Title
Insurance Agency, ("Respondent"), stipulate as follows:

- 1. The Presiding Officer may enter the Findings of Fact, Conclusions of Law, and Order filed herewith.
- 2. The Findings of Fact, Conclusions of Law, and Order shall not be subject to reconsideration, modification, hearing, agency review or appeal.
- 3. The issuance of the signed and adopted Order is solely for the purpose of disposing of the specific matter entitled therein. Only promises, agreements, and

understandings that the parties have regarding this matter are contained in the Findings of Fact, Conclusions of Law, and Order.

4. The parties enter into this Stipulation voluntarily, knowingly, and free from any coercion of any kind.

DATED: June \_\_\_\_\_\_\_, 2025,

DATED: June 6, 2025

License # 849822

/s/ Shelley A. Coudreaut

Shelley A. Coudreaut

Assistant Utah Attorney General

Attorney for Utah Insurance Department

HELEN A. FROHLICH (8814) Assistant Attorney General DEREK E. BROWN (10476) 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: hfrohlich@agutah.gov

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#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,	NOTICE OF AGENCY ACTION
Complainant, vs.	
P1 TITLE INSURANCE AGENCY,	Docket No. 2025-4814
LLC,	Donald H. Hansen
Respondent.	Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") commences this agency action as an informal adjudicative proceeding for entry of Findings of Fact, Conclusions of Law, and Order to which the Department and Respondent P1 Title Insurance Agency, LLC, have stipulated. Filed contemporaneously with this Notice of Agency Action are the parties' Stipulation and their proposed Findings of Fact, Conclusions of Law, and Order.

The legal authority and jurisdiction under which the proceeding is maintained is

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Utah Code §§ 31A-2-201 and 63G-4-201 through 203 and Utah Admin. Code R590-160.

DATED this 18<sup>th</sup> day of June 2025.

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 Telephone: 801-957-9321

Email: uidadmincases@utah.gov

# **CERTIFICATE OF SERVICE**

The undersigned certifies that on this date a true and correct copy of the foregoing Notice of Agency Action was electronically mailed to:

P1 Title Insurance Agency, LLC 7646 S. Union Park Ave. Midvale, UT 84047-2927 <a href="mailto:tami@pltitle.com">tami@pltitle.com</a>

and

Helen A. Frohlich Assistant Attorney General <a href="mailto:hfrohlich@agutah.gov">hfrohlich@agutah.gov</a>

DATED this \_\_\_\_\_ day of June 2025.

Jeanine Couser Utah Insurance Department 4315 South 2700 West, Suite 2300 Taylorsville, UT 84129 801-957-9321 HELEN A. FROHLICH (8814) Assistant Attorney General DEREK E. BROWN (10476) 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: hfrohlich@agutah.gov

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,

Complainant,

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VS.

P1 TITLE INSURANCE AGENCY, LLC,

Respondent.

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Docket No. 2025-4814

Donald H. Hansen

Administrative Law Judge/Presiding Officer

Complainant, Utah Insurance Department ("Department") and Respondent, P1 Title Insurance Agency, LLC, ("Respondent") 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 resident producer organization holding Utah license number 774382.
- 2. Respondent's mailing address is 7646 S. Union Park Ave., Midvale, UT 84047-2927.
- 3. Pursuant to Utah Code § 31A-23a-413 and Utah Admin. Code R592-11, by May 1 of each year, agency title insurance producers are required to file a verified statement of the agency

title insurance producer's financial condition, transactions, and affairs (the "Title Insurance Producer's Annual Report"), as of the end of the preceding calendar year.

- 4. Respondent failed to file its 2024 Title Insurance Producer's Annual Report by May 1, 2025.
- The Department and Respondent have agreed to an administrative forfeiture of \$500.00

## **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-413 and Utah Admin. Code R592-11 by failing to file its 2024 Title Insurance Producer's Annual Report by May 1, 2025.
- 4. As a penalty for the violations in this case, the Respondent should be ordered to pay a forfeiture of \$500.00.

#### <u>ORDER</u>

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

- Respondent shall pay a forfeiture of \$500.00 for the violations described in the Conclusions of Law.
- 2. The forfeiture shall be paid in full to the Department no later than 30 days after this order is signed.
- 3. Respondent is ordered not to commit the violations described in the Conclusions of

Law in the future.

DATED this 18th day of June 2025.

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

## NOTICE TO RESPONDENT

Failure to obey this Order may subject you to further penalties that include a forfeiture of up to \$5,000 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 being 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 electronically mailed to:

P1 Title Insurance Agency, LLC 7646 S. Union Park Ave. Midvale, UT 84047-2927 tami@p1title.com

and

DATED this \_\_\_\_\_ day of June 2025.

Jeanine Couser Utah Insurance Department 4315 South 2700 West, Suite 2300 Taylorsville, UT 84129 801-957-9321 HELEN A. FROHLICH (8814)
Assistant Attorney General
DEREK E. BROWN (10476)
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: hfrohlich@agutah.gov

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,	STIPULATION
Complainant, vs.	
P1 TITLE INSURANCE AGENCY, LLC,	Docket No. 2025-4814
Respondent.	Donald H. Hansen Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") and Respondent P1 Title Insurance Agency, LLC, ("Respondent"), stipulate as follows:

- 1. The Presiding Officer may enter the Findings of Fact, Conclusions of Law, and Order filed herewith.
- 2. The Findings of Fact, Conclusions of Law, and Order shall not be subject to reconsideration, modification, hearing, agency review or appeal.
- 3. The issuance of the signed and adopted Order is solely for the purpose of disposing of the specific matter entitled therein. Only promises, agreements, and understandings that the parties have regarding this matter are contained in the Findings of Fact, Conclusions of Law, and Order.

4. The parties enter into this Stipulation voluntarily, knowingly, and free from any coercion of any kind.

DATED: June 10, 2025 DATED: June 10, 2025

/s/ Joan Pok /s/ Helen A. Frohlich Joan Pok Helen A. Frohlich

Owner

Assistant Utah Attorney General Attorney for Utah Insurance Department P1 Title Insurance Agency, LLC

SHELLEY A. COUDREAUT (9663)

**Assistant Attorney General** 

**DEREK E. BROWN** (10476)

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

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,

Complainant,
vs.

Docket No. 2025-4815

TRUE CONCEPT TITLE, INC.,

Respondent.

Donald H. Hansen
Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") commences this agency action as an informal adjudicative proceeding for entry of Findings of Fact, Conclusions of Law, and Order to which the Department and True Concept Title, Inc., have stipulated. Filed contemporaneously with this Notice of Agency Action are the parties' Stipulation and their proposed Findings of Fact, Conclusions of Law, and Order.

The legal authority and jurisdiction under which the proceeding is maintained is

/// /// Utah Code §§ 31A-2-201 and 63G-4-201 through 203 and Utah Admin. Code R.590-160.

DATED this 10<sup>th</sup> day of June 2025.

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 Telephone: 801-957-9321

Email: uidadmincases@utah.gov

# **CERTIFICATE OF SERVICE**

The undersigned certifies that on this date a true and correct copy of the foregoing Notice of Agency Action was electronically mailed to:

True Concept Title Inc. 345 East Broadway Salt Lake City, UT 84111-2604 <a href="mailto:swilson@trueconcepttitle.com">swilson@trueconcepttitle.com</a>

and

Shelley A. Coudreaut Assistant Attorney General sacoudreaut@agutah.gov

DATED this \_\_\_\_\_ day of June 2025.

Utah Insurance Department 4315 South 2700 West, Suite 2300 Taylorsville, UT 84129 801-957-9321 SHELLEY A. COUDREAUT (9663)

Assistant Attorney General

**DEREK E. BROWN (10476)** 

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

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,  Complainant,  vs.	FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER  Docket No. 2025-4815	
TRUE CONCEPT TITLE, INC.,  Respondent.	Donald H. Hansen	

Administrative Law Judge/Presiding Officer

Complainant, Utah Insurance Department ("Department") and Respondent, True Concept

Title Inc., ("Respondent"), have stipulated to entry of the following Findings of Fact,

Conclusions of Law, and Order, solely for purposes of resolving this matter.

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, authorized to do the business of insurance in Utah under license number 366050.
  - 2. Respondent's mailing address is 345 East Broadway, Salt Lake City, UT 84111-2604.
  - 3. Pursuant to Utah Code § 31A-23a-413 and Utah Admin. Code R.592-11-3(1), an

agency title insurance producer shall annually file with the Commissioner, by May 1<sup>st</sup> of each year, a verified statement of the agency title insurance producer's financial condition, transactions, and affairs ("annual report") as of the end of the preceding calendar year.

- 4. The Respondent failed to file its 2024 annual report by the May 1<sup>st</sup> deadline. Upon notice by the Department of the outstanding filing, Respondent subsequently filed its 2024 annual report on May 28, 2025.
- 5. As a result of the Respondent's violations, the Department and Respondent have agreed to an administrative forfeiture of \$250.

## **CONCLUSIONS OF LAW**

- 1. The Utah Insurance 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. Pursuant to Utah Code 31A-23a-413 and Utah Admin. Code R.592-11-3(1), an agency title insurance producer shall annually file with the Commissioner, by May 1<sup>st</sup> of each year, a verified statement of the agency title insurance producer's financial condition, transactions, and affairs ("annual report") as of the end of the preceding calendar year.
- 4. Respondent violated Utah Code § 31A-23a-413 and Utah Admin. Code R.592-11-3(1), when it failed to file its annual report with the Commissioner, by May 1, 2025.
- 5. As a penalty for the violations in this case, the Respondent should be ordered to pay a forfeiture of \$250.

#### **ORDER**

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

that:

1. Respondent shall pay a forfeiture of \$250 for the violation described in the

Conclusions of Law. The forfeiture shall be paid in full to the Department no later than thirty

(30) days after this order is signed.

2. Respondent is ordered not to commit the violations described in the Conclusions of

Law in the future.

DATED this 10<sup>th</sup> day of June 2025.

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

# **NOTICE TO RESPONDENT**

Failure to obey this Order may subject you to further penalties that include a forfeiture of up to \$5,000 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 being 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 electronically mailed to:

True Concept Title Inc. 345 East Broadway Salt Lake City, UT 84111-2604 <a href="mailto:swilson@trueconcepttitle.com">swilson@trueconcepttitle.com</a>

and

Shelley A. Coudreaut Assistant Attorney General sacoudreaut@agutah.gov

DATED this \_\_\_\_\_ day of June 2025.

Utah Insurance Department 4315 South 2700 West, Suite 2300 Taylorsville, UT 84129 801-957-9321 SHELLEY A. COUDREAUT (9663)
Assistant Attorney General
DEREK E. BROWN (10476)
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Telephone: (801) 366-0375 Email: sacoudreaut@agutah.gov

#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,	STIPULATION
Complainant, vs.	Docket No. 2025-4815
TRUE CONCEPT TITLE, INC.,	
Respondent.	Donald H. Hansen Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") and Respondent True Concept

Title Inc., ("Respondent"), stipulate as follows:

- The Presiding Officer may enter the Findings of Fact, Conclusions of Law, and Order filed herewith.
- The Findings of Fact, Conclusions of Law, and Order shall not be subject to reconsideration, modification, hearing, agency review or appeal.
- 3. The issuance of the signed and adopted Order is solely for the purpose of disposing of the specific matter entitled therein. Only promises, agreements, and

understandings that the parties have regarding this matter are contained in the Findings of Fact, Conclusions of Law, and Order.

 The parties enter into this Stipulation voluntarily, knowingly, and free from any coercion of any kind.

DATED: June 7, 2025,

DATED: June 6, 2025

Ian Gorman License # 366050 Isl Shelley A. Coudreaut
Shelley A. Coudreaut
Assistant Utah Attorney General
Attorney for Utah Insurance Department

SHELLEY A. COUDREAUT (9663)

**Assistant Attorney General** 

**DEREK E. BROWN (10476)** 

Attorney General

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BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,

NOTICE OF AGENCY ACTION

Complainant,

VS.

Docket No. 2025-4822

ENDPOINT DIGITAL CLOSINGS, LLC,

Respondent.

Donald H. Hansen Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") commences this agency action as an informal adjudicative proceeding for entry of Findings of Fact, Conclusions of Law, and Order to which the Department and Endpoint Digital Closings, LLC have stipulated. Filed contemporaneously with this Notice of Agency Action are the parties' Stipulation and their proposed Findings of Fact, Conclusions of Law, and Order.

The legal authority and jurisdiction under which the proceeding is maintained is

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Utah Code §§ 31A-2-201 and 63G-4-201 through 203 and Utah Admin. Code R.590-160.

DATED this 2<sup>nd</sup> day of July 2025.

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

Telephone: 801-957-9321

Email: uidadmincases@utah.gov

SHELLEY A. COUDREAUT (9663) Assistant Attorney General

DEREK E. BROWN (10476)

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#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,

Complainant,

vs.

PINDINGS OF FACT, CONCLUSIONS OF
LAW AND ORDER

Docket No. 2025-4822

ENDPOINT DIGITAL CLOSINGS, LLC,

Respondent.

Donald H. Hansen

Administrative Law Judge/Presiding Officer

Complainant, Utah Insurance Department ("Department") and Respondent, Endpoint Digital Closings, LLC, ("Respondent"), have stipulated to entry of the following Findings of Fact, Conclusions of Law, and Order, solely for purposes of resolving this matter.

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

## **FINDINGS OF FACT**

- 1. Respondent is a nonresident producer organization, authorized to do the business of insurance in Utah under license number 977821.
  - 2. Respondent's mailing address is

- 3. Pursuant to Utah Code § 31A-23a-413 and Utah Admin. Code R.592-11-3(1), an agency title insurance producer shall annually file with the Commissioner, by May 1<sup>st</sup> of each year, a verified statement of the agency title insurance producer's financial condition, transactions, and affairs ("annual report") as of the end of the preceding calendar year.
- 4. The Respondent failed to file its 2024 annual report by the May 1<sup>st</sup> deadline. Respondent subsequently filed its 2024 annual report on May 15, 2025.
- 5. As a result of the Respondent's violations, the Department and Respondent have agreed to an administrative forfeiture of \$500.

## **CONCLUSIONS OF LAW**

- 1. The Utah Insurance 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. Pursuant to Utah Code 31A-23a-413 and Utah Admin. Code R.592-11-3(1), an agency title insurance producer shall annually file with the Commissioner, by May 1<sup>st</sup> of each year, a verified statement of the agency title insurance producer's financial condition, transactions, and affairs ("annual report") as of the end of the preceding calendar year.
- 4. Respondent violated Utah Code § 31A-23a-413 and Utah Admin. Code R.592-11-3(1), when it failed to file its annual report with the Commissioner, by May 1, 2025.
- 5. As a penalty for the violations in this case, the Respondent should be ordered to pay a forfeiture of \$500.

#### **ORDER**

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

that:

1. Respondent shall pay a forfeiture of \$500 for the violation described in the

Conclusions of Law. The forfeiture shall be paid in full to the Department no later than thirty

(30) days after this order is signed.

2. Respondent is ordered not to commit the violations described in the Conclusions of

Law in the future.

DATED this 2<sup>nd</sup> day of July 2025.

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

## **NOTICE TO RESPONDENT**

Failure to obey this Order may subject you to further penalties that include a forfeiture of up to \$5,000 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 being 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.

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#### BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT,	STIPULATION
Complainant, vs.	Docket No. 2025-4822
ENDPOINT DIGITAL CLOSINGS, LLC,	
Respondent.	Donald H. Hansen Administrative Law Judge/Presiding Officer

The Utah Insurance Department ("Department") and Respondent Endpoint Digital Closings, LLC, ("Respondent"), stipulate as follows:

- The Presiding Officer may enter the Findings of Fact, Conclusions of Law, and Order filed herewith.
- 2. The Findings of Fact, Conclusions of Law, and Order shall not be subject to reconsideration, modification, hearing, agency review or appeal.
- 3. The issuance of the signed and adopted Order is solely for the purpose of disposing of the specific matter entitled therein. Only promises, agreements, and

understandings that the parties have regarding this matter are contained in the Findings of Fact, Conclusions of Law, and Order.

4. The parties enter into this Stipulation voluntarily, knowingly, and free from any coercion of any kind.

DATED: June \_27 , 2025,

DATED: June 26, 2025

Donna Wildes

License # 977821

<sub>Ist</sub>Donna Wildes

/s/ Shelley A. Coudreaut

Shelley A. Coudreaut Assistant Utah Attorney General

Attorney for Utah Insurance Department

Approval Date	2nd Quarter April 2025 -June 2025 Approved Title Courses	Provider Name	Totals
Apr-25			20
4/3/2025	Title Issues Involving Divorce and Transfer of Real Property	Utah Land Title Association	
4/7/2025	Claims - Lessons Learned	First American Title Insurance Company	
4/9/2025	1031 Exchanges: The Fundamentals	Salt CE LLC	
4/9/2025	A Bad Day Phishin': Cyber Fraud Awareness	Salt CE LLC	
4/9/2025	AI Within Title & Real Estate	Salt CE LLC	
4/9/2025	Bye Dirt: Vacant Land & Rental Property Fraud	Salt CE LLC	
4/9/2025	Consumer Protection & Prevention of Elder Abuse	Salt CE LLC	
4/9/2025	Fully Committed: The Title Commitment & Policy	Salt CE LLC	
4/9/2025	This Is Ron: Digital Closings Are Here To Stay	Salt CE LLC	
4/9/2025	Title Insurance FUNdamentals	Salt CE LLC	
4/9/2025	Utah Insurance Dept. Rules: & R592-6	Salt CE LLC	
4/9/2025	Utah's Mechanics Lien Law & SCR	Salt CE LLC	
4/14/2025	AU - Ethics of Generative AI	Old Republic National Title Ins. Co.	
4/15/2025	Underwriting Construction Transactions	Fulghum	
4/16/2025	2025 Data Security Best Practices for Title and Escrow Professionals	Backman Title Services LTD	
4/16/2025	Mastering 1099-S: Avoiding Costly Errors	Backman Title Services LTD	
4/16/2025	2025 Utah Legislative Update	Backman Title Services LTD	
4/24/2025	For the Love of HOA's	Novation Title Insurance Agency	
4/28/2025	ALTA FinCEN Bootcamp	American Land Title Association	
4/28/2025	Title Insurance, Telling Our Story	Fulghum	
May-25			6
5/1/2025	May 2025 Closer Training	Southern Utah Title Insurance Company	
5/5/2025	Coverages and Claims The Joys of Forgery and Impersonation	Utah Land Title Association	
5/9/2025	2025 Victorious Escrow Training Live On-Site Event	Fidelity National Financial Inc.	
5/15/2025	ABD's of Title Insurance	Fulghum	
5/19/2025	2024 Commercial Endorsements	First American Title Insurance Company	
5/19/2025	Mechanics Liens in Title Insurance	First American Title Insurance Company	

Approval Date	2nd Quarter April 2025 - June 2025 Approved Title Courses	Provider Name	Totals
Jun-25			6
6/3/2025	Claims: Tales Through Time!	Utah Land Title Association	
6/4/2025	ALTA Insights: Land Banks and Insurable Title	American Land Title Association	
6/6/2025	FinCEN AML Rules	Fulghum	
6/11/2025	Access Granted! An Advanced Guide to Easements and Title Insurance	Fulghum	
6/11/2025	Understanding the FinCEN Rule on Anti-Money Laundering Regulations	Fulghum	
6/20/2025	Turning Conflict into Cooperation	Westcore Land Title Insurance Co.	

## **TEC Marketing Question 1**

I have couple of questions regarding the Rule of 592.6.2

**Questions 1:** This question adhered towards notice of default homes that are already listed by a listing agent. Can we as Escrow officers travel along with RE agents, door knocking, visiting homeowner's where their mortgage is in default? Also, can we as EO's, during the visit with the homeowners, ask the seller(s) to sign an Authorization Form so we can request their Payoff information? Again, a reminder, the homes are already listed by another agent and the Escrow Company has already been selected by the listing agent.

**Questions 2:** Can a Title and Escrow Company's name be included in a sign displayed, at the Real Estate Brokerage office, as one of that Brokerages partners? The sign includes the Brokerage name, preferred lender, preferred title company and other vendors are also included?

# **TEC Marketing Question #2**

I have been approached with an interesting question.

A group that has a parade of homes entry has indicated that we can have the "privilege" of being at one of their booths (for a fee of course) at their parade of home property. I believe we can pay for a booth at, for example, a Spanish heritage celebration, but I wanted to see what the states view of the above scenario would be.

Thank you in advance for any guidance.

Clarification for "Group" -

The group consists of investors that own the homes in question.