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DEPT OF INSURANCE,  
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DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION

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MAR 31 2014

P.O. Box 690, Jefferson City, Mo. 65102-0690

MO. DEPT OF INSURANCE,  
FINANCIAL INSTITUTIONS &  
PROFESSIONAL REGISTRATION

IN RE: INVESTORS TITLE COMPANY  
219 SOUTH CENTRAL  
ST. LOUIS, MO 63105

TRACKING ID 162304

VOLUNTARY FORFEITURE AGREEMENT

It is hereby agreed by Investors Title Company ("Investors") and the Consumer Affairs Division of the Department of Insurance, Financial Institutions and Professional Registration, as follows:

WHEREAS, John M. Huff is the duly appointed Director of the Department of Insurance, Financial Institutions and Professional Registration, State of Missouri (hereinafter, "Director" of the "Department") whose duties, pursuant to Chapters 374, 375 and 381 RSMo, include the supervision and regulation of the business of insurance;

WHEREAS, the Consumer Affairs Division of the Department is charged with investigating producers and companies engaged in the business of insurance pursuant to Sections

374.085 and 374.190, RSMo and is authorized by the Director to recommend enforcement action under the laws relating to insurance;

WHEREAS, Investors is licensed as a business entity insurance producer by the Department, pursuant to Chapters 374, 375 and 381, RSMo;

WHEREAS, based on its investigation of Investors file 259619 which closed March 27, 2008 the Department alleges that:

1. In one instance Investor's completed or revised a non-standard note to be secured by an insured deed of trust. The revisions were not based on instructions from an attorney licensed in Missouri, demonstrating incompetence and untrustworthiness in the conduct of business, a ground for discipline pursuant to Section 375.141.1 (8) RSMo (Supp. 2013);
2. In one instance Investors prepared a second deed of trust, which described the debt secured as a note for purchase money. The deed of trust was for the benefit of a party for whom title insurance was not contemplated and the beneficiary's funds were not disbursed through the file, demonstrating incompetence and untrustworthiness in the conduct of business, a ground for discipline pursuant to Section 375.141.1 (8) RSMo (Supp. 2013);
3. In one instance Investors issued a closing protection letter to the seller on the form for an owner/lender demonstrating incompetence and untrustworthiness in the conduct of business, a ground for discipline pursuant to Section 375.141.1 (8) RSMo (Supp. 2013);
4. In one instance Investors failed to issue a paid for closing protection letter to the first lender, demonstrating incompetence and untrustworthiness in the conduct of business, a ground for discipline pursuant to Section 375.141.1 (8) RSMo (Supp. 2013);
5. In one instance Investors disbursed lender's funds without individual written instructions specifying under what conditions and to whom the funds may be disbursed in violation of Section 381.022.3 (4) RSMo (Supp. 2013), a ground for discipline under Section 375.141.1 (2) RSMo (Supp. 2013). This is a level three violation under Section

374.049 RSMo (Supp. 2013) pursuant to Section 381.022.7 RSMo (Supp. 2013);

6. In one instance Investors failed to give the buyer written notice consistent with the requirements of Section 381.022.5 RSMo (Supp. 2013), a ground for discipline under Section 375.141.1 (2) RSMo (Supp. 2013) and a level three violation under Section 374.049 RSMo (Supp. 2013) pursuant to Section 381.022.7 RSMo (Supp. 2013);
7. In one instance Investors failed to maintain a signed copy of the promissory note from the buyer to the insured lender in the file, inconsistent with the requirements of Section 381.038.2 RSMo (Supp. 2013), a level two violation under Section 374.049 RSMo (Supp. 2013) pursuant to Section 381.038.5 RSMo (Supp. 2013) and a ground for discipline pursuant to Section 375.141.1 (2) RSMo (Supp. 2013);
8. In one instance Investors failed to soundly underwrite the owner and loan policies as required by Section 381.071.1 (2) RSMo, a level two violation under Section 374.049 RSMo (Supp. 2013) pursuant to Section 375.145.1 RSMo (Supp. 2013) and a ground for discipline pursuant to Section 375.141.1 (2) RSMo (Supp. 2013); and,
9. In November 2011 Investors failed to inform the Director of the termination of Sharon Midgett, an insurance producer, as required by Section 375.015.5 RSMo (Supp. 2013). This is a level two violation under Section 374.049 RSMo (Supp. 2013) pursuant to Section 375.145.1 RSMo;

subjecting Investors to enforcement action by the Director;

WHEREAS, Investors has been informed of its right to counsel and of its right to contest any attempt by the Department to discipline its producer license, and states that it understands its rights to contest any such actions;

AND WHEREAS, Investors, acknowledges and admits for purposes of this Agreement and for purposes of any future action by the Director or the Consumer Affairs Division based on any additional violation of the insurance laws or regulations by Investors, in

which action the Director or the Consumer Affairs Division alleges that the violations described herein form part of a course of conduct, a business practice, or other such series of similar

violations, or that future violations by Investors are committed knowingly, intentionally or in conscious disregard of the law, that it disbursed lender's funds without individual written instructions, failed to give the buyer written notice consistent with the requirements of Section 381.022.5, RSMo, failed to maintain a signed copy of the promissory note from the buyer to the insured lender in the file, failed to soundly underwrite the owner and loan policies and failed to inform the Director of the termination of an insurance producer, and that such conduct violated Sections 381.022.3(4), 381.022.5, 381.038.2, 381.071.1(2) and 375.015.5, RSMo (Supp. 2013).

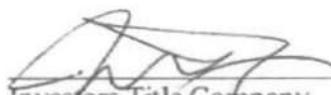
NOW, THEREFORE, in lieu of any recommendation or initiation by the Consumer Affairs Division of any action based on the violations cited in this agreement, and after being afforded the opportunity to consult legal counsel, Investors does hereby voluntarily and knowingly surrender and forfeit the sum of nine thousand dollars (\$9,000.00) such sum to be paid into the Missouri State School Moneys Fund pursuant to Sections 374.046 and 374.280, RSMo.

Investors shall submit this sum to the Department of Insurance, Financial Institutions and Professional Registration by cashier's check or money order made payable to the Missouri State School Moneys Fund no later than April 21, 2014.

The parties agree that, should the Director or the Division in the future allege any additional violation of the insurance laws or regulations by Investors, nothing in this agreement shall preclude the Director or the Consumer Affairs Division from introducing Investors' admissions contained in this Agreement as evidence that the acts described herein form part of a

course of conduct, a business practice, or other such series of similar violations, or for purposes of showing that such later alleged acts were committed knowingly, intentionally or in conscious disregard of the law.

DATED: 3/24/14

  
Investors Title Company  
Producer No. 0042456  
By: Joe Crutchfield  
Is: Pres

DATED: 4.1.14

  
MATT BARTON, Director  
Consumer Affairs Division

DATED: 4-3-14

  
JOHN M. HUFF, Director  
Missouri Department of Insurance, Financial  
Institutions and Professional Registration

Return to:

Kathleen E. Jolly  
Department of Insurance, Financial Institutions  
and Professional Registration  
P O Box 4001  
Jefferson City, MO 65102