DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION

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

IN RE: NETCO TITLE, INC.
733 CROWN INDUSTRIAL CT., STE. A
CHESTERFIELD, MO 63005

TRACKING ID 266566

VOLUNTARY FORFEITURE AGREEMENT

RECEIVED

It is hereby agreed by Netco Title, Inc., ("Netco") 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, Netco currently holds an active license as a business entity producer with the Department, pursuant to Chapter 375, RSMo;

WHEREAS, the Consumer Affairs Division has received information concerning Netco

failure to:

- Timely record deeds and security instruments within five days in violation of Section 381.026.1, RSMo (Supp. 2013);
- Timely deliver insurance policies pursuant to Section 381.038.3, RSMo (Supp. 2013);
- Follow written instructions in violation of Section 381.022.3(3), RSMo (Supp. 2013);
- Document files consistent with the payoff statements and the payoff documented on the HUD-1, when relying on other parties to provide funds for the payoff when in contemplation of a title insurance policy to be issued, such conduct is inconsistent with sound underwriting practices, pursuant to Section 381.071.1(2), RSMo (Supp. 2013);

Additionally, Netco:

- Allowed employees to conduct the business of title insurance without an insurance producer license pursuant to Section 381.115.1 and 381.115.2(2), RSMo (Supp. 2013);
- Materially aided employees to violate Chapter 381 by allowing employees to determine insurability, handle closings, settlements and escrows for the business of title insurance in contemplation of a title insurance policy to be issued pursuant to Section 375.145.1, RSMo (Supp. 2013);

and subjects Netco to enforcement action by the Director;

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

WHEREAS, Netco acknowledges and admits for purposes of this Agreement that it

failed to:

- Timely record deeds and security instruments within five days in violation of Section 381.026.1, RSMo (Supp. 2013);
- Timely deliver the insurance policies to insureds pursuant to Section 381.038.3, RSMo (Supp. 2013);
- Follow written instructions in violation of Section 381.022.3(3), RSMo (Supp. 2013) and failed to document files consistent with the payoff statements and the payoff documented on the HUD-1, when relying on other parties to provide funds for the payoff when in contemplation of a title insurance policy to be issued, such conduct is inconsistent with sound underwriting practices pursuant to Section 381.071.1(2), RSMo (Supp. 2013);

And, that it also:

- Allowed employees to conduct the business of title insurance without an insurance producer license pursuant to Section 381.115.1 and 381.115.2(2), RSMo (Supp. 2013);
- Materially aided employees to violate Chapter 381 by allowing employees to determine insurability, handle closings, settlements and escrows for the business of title insurance in contemplation of a title insurance policy to be issued pursuant to Section 375.145.1, 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, Netco does hereby voluntarily and knowingly surrender and forfeit the sum of one thousand four hundred fifty dollars ($1,450.00), such sum to be paid into the State School Moneys Fund pursuant to Sections 374.046 and 374.280, RSMo.

Netco shall submit this sum to the Department by cashier's check or money order made

payable to the State School Moneys Fund no later than June 9, 2016.

The parties agree that, should the Director or the Division in the future allege an additional violation of the insurance laws or regulations by Netco, nothing in this Agreement shall preclude the Director or the Consumer Affairs Division from introducing Netco's 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 are committed knowingly, intentionally or in conscious disregard of the law.

DATED: 6.20.16

Netco Title, Inc.
By: PAT DONOVAN
Its: SECRETARY
License No. 8004874

DATED: 6/22/16

Carrie Couch, Director
Consumer Affairs Division

DATED: 6/28/16

John M. Huff, Director
Department of Insurance, Financial
Institutions and Professional
Registration

Return original to:
Marjorie Thompson
Missouri Department of Insurance,
Financial Institutions and Professional Registration
PO Box 4001
Jefferson City, MO 65102