



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

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

In re: )  
United General Title Insurance Co. (NAIC #51624) ) Investigation No. 11017-51624-PC

**ORDER OF THE DIRECTOR**

NOW, on this 24<sup>TH</sup> day of APRIL, 2012, Director John M. Huff, after consideration and review of the market conduct investigation of United General Title Insurance Company (NAIC #51624), (hereafter referred to as "the Company") investigation number 11017-51624-PC, conducted by the Division of Insurance Market Regulation pursuant to §374.190 RSMo, and the Stipulation of Settlement ("Stipulation"), does hereby issue the following orders:

This order, issued pursuant to §374.046.15, RSMo (Cum. Supp. 2010) and §374.280 RSMo, is in the public interest.

IT IS THEREFORE ORDERED that, the Company and the Division of Insurance Market Regulation having agreed to the Stipulation, the Director does hereby approve and agree to the Stipulation.

IT IS FURTHER ORDERED that the Company shall not engage in any of the violations of law and regulations set forth in the Stipulation and shall implement procedures to place the Company in full compliance with the requirements in the Stipulation and the statutes and regulations of the State of Missouri and to maintain those corrective actions at all times.

IT IS FURTHER ORDERED that the Company shall pay, and the Department of Insurance, Financial Institutions and Professional Registration, State of Missouri, shall accept, the Voluntary

Forfeiture of \$23,000, payable to the Missouri State School Fund.

IT IS SO ORDERED.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of my office in Jefferson City, Missouri, this 24<sup>th</sup> day of APRIL, 2012.

A handwritten signature in black ink, appearing to read "John M. Huff", is written over a horizontal line. The signature is stylized with a large initial "J" and a long horizontal stroke.

John M. Huff  
Director

# STATE OF MISSOURI



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## DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION

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

TO: First American Title Insurance Company  
1 First American Way  
Santa Ana, CA 92707

RE: United General Title Insurance Company (NAIC #51624)  
Missouri Market Conduct Investigation #11017-51624-PC

### STIPULATION OF SETTLEMENT AND VOLUNTARY FORFEITURE

It is hereby stipulated and agreed by John M. Huff, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, hereinafter referred to as "Director," and First American Title Insurance Company (NAIC #50814), (hereafter referred to as "First American"), as follows:

WHEREAS, John M. Huff is the Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration (hereafter referred to as "the Department"), an agency of the State of Missouri, created and established for administering and enforcing all laws in relation to insurance companies doing business in the State in Missouri; and

WHEREAS, First American has been granted a certificate of authority to transact the business of insurance in the State of Missouri; and

WHEREAS, in early 2008, United General Title Insurance Company (NAIC#51624) (hereinafter referred to as "United General") informed the Department that it was ceasing business in all states including Missouri and bringing the company dormant.

WHEREAS, the Department conducted a Market Conduct Investigation of United General regarding its business practices prior to dormancy and prepared report number 11017-51624-PC; and

WHEREAS, the report of the Market Conduct Investigation revealed that:

1. In twenty three (23) instances, United General terminated an agency relationship but failed to report the termination and the reasons for the termination to the Director in violation of §381.018.5 RSMo.

WHEREAS, First American hereby agrees to take remedial action bringing it into compliance with the statutes and agrees to maintain those corrective actions at all times including, but not limited to, taking the following actions:


1. First American agrees that if First American decides to resurrect United General and United General commences business in Missouri, United General agrees to take corrective action to assure that the errors noted in the above-referenced market conduct investigation report do not recur, and within 90 days of commencement of business in Missouri, United General will file documentation of all remedial actions taken by it to implement compliance with the terms of this Stipulation.

WHEREAS, First American, after being advised by legal counsel, does hereby voluntarily and knowingly waive any and all rights for procedural requirements, including notice and an opportunity for a hearing, which may have otherwise applied to the above referenced Market Conduct Investigation; and

WHEREAS, First American hereby agrees to the imposition of the ORDER of the Director and as a result of Market Conduct Investigation #11017-51624-PC further agrees, voluntarily and knowingly to surrender and forfeit the sum of \$23,000.

NOW, THEREFORE, in lieu of the institution by the Director of any action for the SUSPENSION or REVOCATION of the Certificate(s) of Authority of First American to transact the business of insurance in the State of Missouri or the imposition of other sanctions, First American does hereby voluntarily and knowingly waive all rights to any hearing, does consent to the ORDER of the Director, and does surrender and forfeit the sum of \$23,000, such sum payable to the Missouri State School Fund, in accordance with §374.280, RSMo.

DATED: April 5, 2012

  
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President  
First American Title Insurance Company  
Dennis J. Gilmore