



DEPARTMENT OF COMMERCE & INSURANCE

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


ORDER

After full consideration and review of the report of the financial examination of Agents National Title Insurance Company for the period ended December 31, 2018 together with any written submissions or rebuttals and any relevant portions of the examiner's workpapers, I, Chlora Lindley-Myers, Director of the Missouri Department of Commerce and Insurance¹ pursuant to section 374.205.3(3)(a), RSMo, adopt such examination report. After my consideration and review of such report, workpapers, and written submissions or rebuttals, I hereby incorporate by reference and deem the following parts of such report to be my findings and conclusions to accompany this order pursuant to section 374.205.3(4), RSMo: summary of significant findings, subsequent events, company history, corporate records, management and control, territory and plan of operation, reinsurance, accounts and records, financial statements, comments on financial statement items, analysis of changes to surplus and general comments and/or recommendations.

Based on such findings and conclusions, I hereby ORDER that the report of the financial examination of Agents National Title Insurance Company as of December 31, 2018 be and is hereby ADOPTED as filed and for Agents National Title Insurance Company to take the following action or actions, which I consider necessary to cure any violation of law, regulation or prior order of the Director revealed by such report: (1) implement and verify compliance with each item mentioned in the Comments on the Financial Statement and/or Summary of Recommendations section of such report; and (2) account for its financial condition and affairs in a manner consistent with the Director's findings and conclusions.

So ordered, signed and official seal affixed this 19th day of September, 2019.




Chlora Lindley-Myers, Director
Department of Commerce and Insurance

¹ Pursuant to Executive Order #19-02, effective August 28, 2019, the department name was changed from the Department of Insurance, Financial Institutions and Professional Registration to the Department of Commerce and Insurance.

REPORT OF
FINANCIAL EXAMINATION

AGENTS NATIONAL TITLE INSURANCE COMPANY

AS OF DECEMBER 31, 2018

FILED
SEP 30 2019
DIRECTOR OF
MISSOURI DEPARTMENT OF
COMMERCE AND INSURANCE



STATE OF MISSOURI
DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS
AND PROFESSIONAL REGISTRATION

JEFFERSON CITY, MISSOURI

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July 3, 2019
Columbia, MO

Honorable Chlora Lindley-Myers, Director
Missouri Department of Insurance, Financial
Institutions and Professional Registration
301 West High Street, Room 530
Jefferson City, MO 65101

Director Lindley-Myers:

In accordance with your financial examination warrant, a comprehensive financial examination has been made of the records, affairs and financial condition of

AGENTS NATIONAL TITLE INSURANCE COMPANY

hereinafter also referred to as “ANTIC” or the “Company.” The Company’s main office is located at 1207 West Broadway, Suite C, Columbia Missouri, 65203; phone number (573) 442-3351. Examination fieldwork began on March 18, 2019, and concluded on the above date.

SCOPE OF EXAMINATION

Period Covered

We have performed a multi-state examination of ANTIC. The last examination of ANTIC was completed as of December 31, 2014. This examination covers the period from January 1, 2015 through December 31, 2018. This examination also includes material transactions or event occurring subsequent to December 31, 2018.

Procedures

We conducted our examination in accordance with the National Association of Insurance Commissioners (NAIC) Financial Condition Examiners Handbook (Handbook), except where practices, procedures and applicable regulations of the Department of Insurance, Financial Institutions and Professional Registration (Department) or statutes of the state of Missouri prevailed. The Handbook requires that we plan and perform the examination to evaluate the financial condition, assess corporate governance, identify current prospective risks of the Company and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer’s surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This includes assessing significant estimates made by management and evaluating management’s compliance with Statutory Accounting Principles. The examination does not attest to the fair presentation of the financial statements included herein. If during the course of the examination an adjustment is identified, the impact of such adjustment will be documented separately following the Company’s financial statements. Key activities identified were Investments, Capital and Surplus, Premiums and Underwriting and Claims and Reserving.

This examination report includes significant findings of fact, as mentioned in Section 374.205 RSMo (Examination, director may conduct, when...) and general information about the insurer and its financial condition. There may be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), are not included within the examination report but were separately communicated to other regulators or the Company.

SUMMARY OF SIGNIFICANT FINDINGS

The Board of Director meeting minutes did not document the election of officers or the approval of intercompany agreements for the current examination period. The shareholder meeting minutes did not document the appointment of directors in 2018.

Upon receipt of an updated appraisal, the Company's reported value for its property held for sale at year-end 2018 was adjusted. The adjustment reduced the reported value of the property to its fair value of \$165,000, as determined by an independent appraisal.

During the examination, multiple instances of non-compliance with Missouri statutes and regulations, NAIC Annual Statement Instructions and Statements of Statutory Accounting Principles were identified. Individually these items were immaterial. However, if not addressed and corrected, these items could become material and adversely impact the Annual Statement.

SUBSEQUENT EVENTS

On December 31, 2018, the Company's shareholder voted to amend the Articles of Incorporation, changing the par value of the Company's stock from \$2.50 per share to \$5.00 per share, effective January 1, 2019. This change increased the Company's common capital stock by \$1 million while decreasing gross paid-in and contributed surplus by the same amount. The Department approved the amendment on February 28, 2019.

COMPANY HISTORY

General

The Company originally incorporated on October 26, 2005, as Farmer's National Title Insurance Company and began business on March 31, 2006. On December 19, 2008, the Company changed its name to Agents National Title Insurance Company.

Dividends and Capital Contributions

There were no dividends declared or paid during the current examination period.

On September 4, 2018, Incenter, LLC (Incenter) contributed four mortgage participation agreements to the Company through ANTIC's immediate parent, Agents National Title Holding Company. The Company reported the transaction as a contribution to paid-in surplus in the amount of \$2,060,733. The Department approved the transaction on August 30, 2018. On December 14, 2018, ANTIC sold the four mortgage participation agreements. The proceeds of the sale, net of the Company's realized gain, continued to be reported as paid-in surplus.

Acquisitions, Mergers and Major Corporate Events

On December 8, 2015, the Company completed the sale of its subsidiary Founders Title Insurance (Founders), a Wyoming-domiciled entity, for \$1.2 million. The Company had acquired Founders in 2012 for a purchase price of \$800,000. Founders did not write any direct business while being owned by ANTIC.

On August 22, 2016, the Company completed its purchase of Gulf Coast Title Insurance Company (Gulf Coast), an Alabama-domiciled entity, for \$283,219. Gulf Coast has not written direct premiums since 2010. At year-end 2018, the carrying value of Gulf Coast was reported as \$330,130, based on statutory equity.

On February 1, 2018, ANTIC's parent, Agents National Title Holding Company, was acquired by Incenter, a wholly-owned subsidiary of UFG Holdings, LLC. The Department approved the transaction on December 22, 2017. On January 4, 2018, the Alabama Department of Insurance approved the transaction. The acquisition was finalized on February 1, 2018.

On September 5, 2018, ANTIC formed a wholly-owned subsidiary, Ava 2025, LLC (Ava). Ava's sole holding is a property acquired through foreclosure on December 19, 2018.

CORPORATE RECORDS

The Company's Articles of Incorporation and Bylaws were reviewed. The Articles of Incorporation were amended May 18, 2018, changing the Company's registered agent. The Bylaws were restated December 6, 2017, to add a Chief Strategy Officer to the Company's list of elected officers.

The minutes of the Board of Directors meetings were reviewed. Following the acquisition by Incenter, the Board of Directors began meeting annually instead of quarterly. The minutes generally appeared to support the approval of major corporate transactions and events for the period under examination. However, the minutes did not document the election of officers or the approval of intercompany agreements effected during the examination period. Further, the shareholder meeting minutes did not document the appointment of directors in 2018.

MANAGEMENT AND CONTROL

Board of Directors

Management of the Company is vested in a Board of Directors consisting of nine members. Directors serving at year-end 2018, as reported on the Annual Statement jurat page, were as follows:

Name	Affiliation	Address
David Townsend	President and Chief Executive Officer	Columbia, MO
Lori Dorman	Secretary	Columbia, MO
Brent Scheer	Treasurer and Chief Financial Officer	Columbia, MO
Patrick Carney	Chief Strategy Officer	Denver, NC
Graham Fleming	Chief Administrative Officer	Irvine, CA
Cheryl Cowherd	Underwriting Counsel	Kansas City, MO
Bruno Pasceri	President, Finance of America	Rydal, PA
Kevin Thomas	Senior Vice President, Underwriting Counsel	Winter Park, FL
John Keratsis	CEO, Boston National Title Agency	Charlotte, NC

Officers

Officers of the Company serving and reported on the Annual Statement jurat page at year-end 2018 were as follows:

Name	Office
David Townsend	President and Chief Executive Officer
Lori Dorman	Secretary
Brent Scheer	Treasurer and Chief Financial Officer
Patrick Carney	Chief Strategy Officer
Graham Fleming	Chief Administrative Officer

Committees

Following the acquisition of the Company's parent by Incenter, an audit committee was no longer designated. Therefore, in accordance with Section 375.1025 RSMo (Definitions), the Company's entire board constitutes its audit committee.

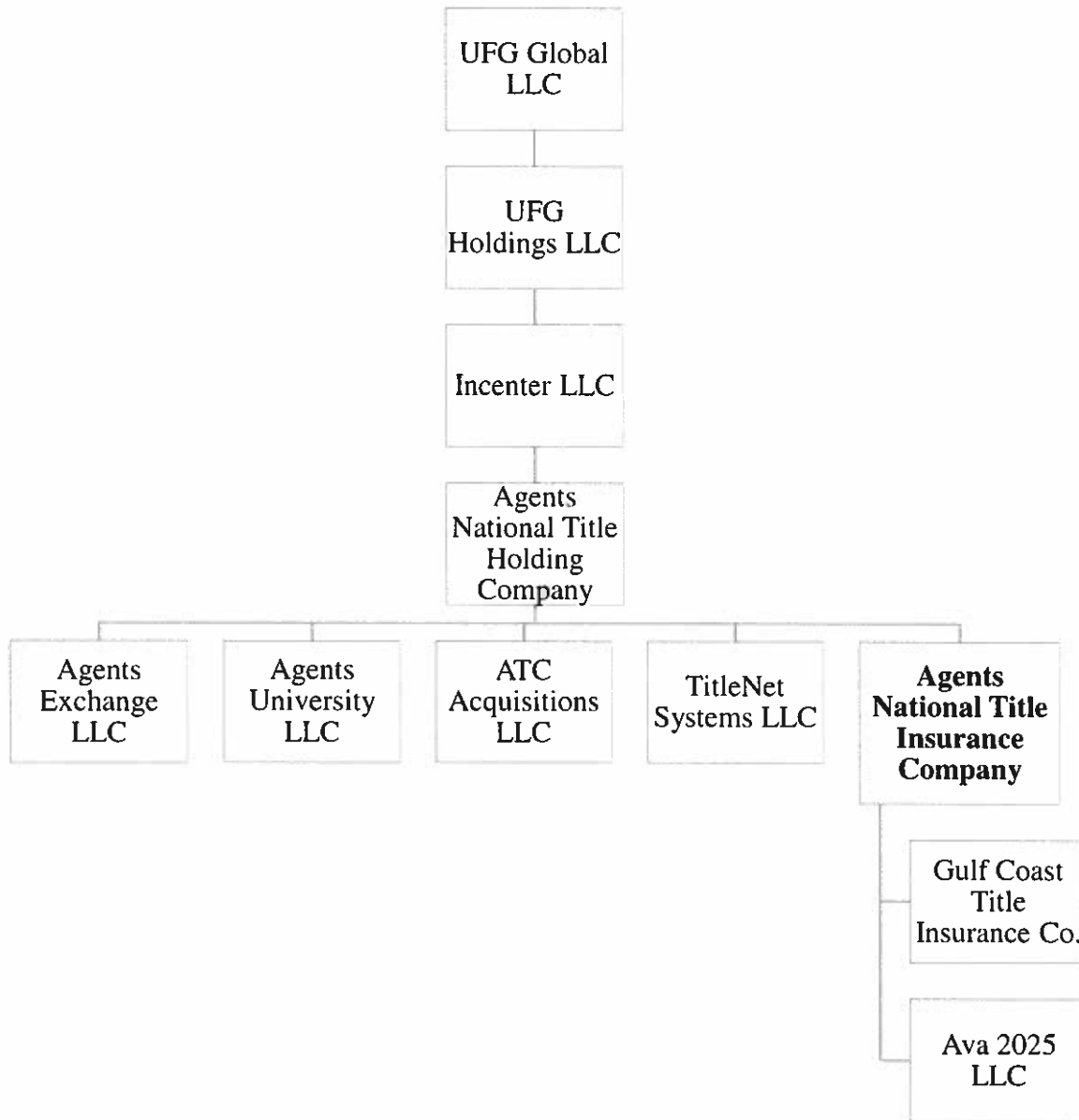
Holding Company, Subsidiaries and Affiliates

The Company is a member of an insurance holding company system as defined by Section 382.010 RSMo (Definitions). The ultimate controlling entity in the insurance holding company system is UFG Global, LLC, a Delaware limited liability company. BTO Urban Holdings LLC and Libman Family Holdings, LLC co-own UFG Global, LLC with shares of 68.59% and 31.10%, respectively.

UFG Global, LLC owns UFG Holdings, LLC, which is the sole owner of Incenter. Incenter is the sole owner of Agents National Title Holding Company, the immediate parent of Agents National Title Insurance Company.

Organizational Chart

The following is a truncated organizational chart depicting the insurance holding company system at year-end 2018. All subsidiaries are wholly-owned unless otherwise noted.



Affiliated Transactions

As of December 31, 2018, the Company was party to the following intercompany agreements.

Software Licensing Agreement

Parties: ANTIC and TitleNet Systems, LLC (TitleNet)

Effective: December 1, 2008

Terms: Under the agreement, TitleNet grants ANTIC a non-exclusive, non-transferable license to use its software, a web-based operating system. ANTIC pays TitleNet the allocated costs for maintaining the software application. In 2018, ANTIC incurred \$296,826 in costs under the agreement.

Tax Sharing Agreement

Parties: Agents National Title Holding Company and its subsidiaries, including ANTIC

Effective: January 1, 2011

Terms: Agents National Title Holding Company prepares and files a consolidated federal income tax return for itself and its subsidiaries. Each subsidiary's tax liability is determined as if the subsidiary filed on a separate company basis.

Cost Sharing Agreement

Parties: Incenter, Agents National Tile Holding Company and its subsidiaries, including ANTIC

Effective: February 1, 2018

Terms: Parties to the agreement provide services to each other including, but not limited to accounting, auditing, tax, claims administration, underwriting, investments, legal and functional support. Fees for services are to be reasonable and in conformity with Statutory Accounting Principles. Shared expenses are apportioned as if the expense were paid solely by the incurring party. Services are billed monthly with payment due within 30 days. In 2018, the Company incurred \$3,012,274 in costs under the agreement.

TERRITORY AND PLAN OF OPERATION

The Company is licensed in Missouri as a title insurer under Chapter 381 RSMo (Title Insurance Law). At year-end 2018, the Company was also licensed in thirty-two other states and the District of Columbia. The states with the largest percentage of direct written business in 2018 were as follows: Missouri (35.1%), Texas (19.6%), Indiana (17.4%) and Florida (14.0%).

The Company's only insurance line of business is title insurance. In addition to title insurance premiums, the Company also has revenue from Closing Protection Letters (CPLs). A CPL is generally issued by ANTIC to a bank providing a mortgage loan in a real estate transaction. The CPL covers any theft or improper use of escrow funds by one of the Company's title agents. Revenues from CPLs represented 6.6% of total revenue in 2018.

Prior to its acquisition by Incenter, the Company had used only independent agents to produce and underwrite policies. Since the acquisition, the Company has relied upon an independent agency force and the affiliated agency operations at Boston National Title. Affiliated agency operations accounted for 35.2% of total operating revenue in 2018. There were 138 active agencies, as of December 31, 2018. The largest single independent agent produced 3% of 2018 direct written premiums. The 10 independent agencies with the largest premium volume accounted for 22.1% of total direct premiums for 2018.

REINSURANCE

General

The Company uses excess-of-loss reinsurance to limit its exposure to catastrophic loss. The Company relies upon Integro Insurance Brokers, a Missouri-licensed reinsurance intermediary, to help manage its reinsurance program. Premiums reported during the current examination period were as follows:

	2015	2016	2017	2018
Direct premiums written	\$ 9,165,383	\$ 8,938,540	\$ 7,725,884	\$ 10,823,697
Premiums ceded	(339,414)	(422,676)	(403,967)	(303,578)
Net premiums written	<u>\$ 8,825,969</u>	<u>\$ 8,515,864</u>	<u>\$ 7,321,917</u>	<u>\$ 10,520,119</u>

Ceded

Excess of Loss (Layer 1)

The Company's first layer of reinsurance provides coverage up to two million, five hundred thousand dollars (\$2.5 million) per risk in excess of the Company's five hundred thousand (\$500,000) retention. This agreement became effective January 1, 2018. The eight counter-parties to the agreement are Lloyds of London participating syndicates or other reinsurers.

Excess of Loss (Layer 2)

ANTIC's second layer of reinsurance provides coverage up to seven million dollars (\$7 million) per risk in excess of three million dollars (\$3 million) with an aggregate treaty limit of twenty-one million dollars (\$21 million). This agreement became effective January 1, 2018. The seven counter-parties to the agreement are Lloyds of London participating syndicates or other reinsurers.

Excess of Loss (Layer 3)

ANTIC's third layer of reinsurance provides coverage up to ten million dollars (\$10 million) per risk in excess of ten million dollars (\$10 million) with an aggregate treaty limit of thirty million dollars (\$30 million). This agreement became effective January 1, 2018. The seven counter-parties to the agreements are Lloyds of London participating syndicates or other reinsurers.

The Layer 2 and Layer 3 agreements are multi-cedant treaties. ANTIC's initial premium is determined by its proportionate share of the total premium written by all cedants. In the event the treaty liability limit is exhausted, a reinstatement premium is required to maintain the treaty coverage. The reinstatement premium is allocated proportionately among the cedants whose claims exhausted the treaty limit. Each treaty is limited to two reinstatements.

Facultative

ANTIC arranges facultative coverage for policies with limits in excess of twenty million dollars (\$20 million). At year-end 2018, the Company had one facultative agreement in place. Under this agreement, Fidelis Underwriting Limited (UK) provides up to \$13,555,000 in coverage in excess of ANTIC's \$20 million retention.

The Company is contingently liable for all reinsurance losses ceded to others. This contingent liability would become an actual liability in the event that an assuming reinsurer fails to perform its obligations under the reinsurance agreement.

ACCOUNTS AND RECORDS

Independent Accountant

For the period under examination, the Company's financial statements were audited by the certified public accounting firm Clifton Larson Allen LLP. The 2017 and 2018 audit workpapers were reviewed and used in the course of the examination as deemed appropriate.

Actuarial Opinion

On October 24, 2018, Paul J. Struzzieri, FCAS, MAAA, a consulting actuary from Milliman, Inc. was appointed by the Board of Directors to review and certify the claims-related reserves and other actuarial items. Mr. Struzzieri found the claims-related reserves and other actuarial items to be reasonable.

FINANCIAL STATEMENTS

The following financial statements are based on the statutory financial statements filed by the Company with the Department and present the financial condition of the Company for the period ending December 31, 2018. The accompanying comments on financial statements reflect any examination adjustments to the amounts reported in the financial statements and should be considered an integral part of the Annual Statement.

There may have been additional differences found in the course of this examination, which are not shown in the "Comments on Financial Statements." These differences were determined to be immaterial in relation to the financial statements, and therefore were only communicated to the Company and noted in the workpapers for each key activity.

ASSETS

As of December 31, 2018

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	\$6,776,045	\$0	\$6,776,045
Common stocks	495,270	0	495,270
First liens - mortgage loans on real estate	292,000	55,200	236,800
Other than first liens - mortgage loans on real estate	102,105	7,184	94,921
Properties held for sale (NOTE 1)	425,976	0	425,976
Cash, cash equivalents and short-term investments	4,364,896	0	4,364,896
Investment income due and accrued	37,995	0	37,995
Uncollected premiums and agents' balances	422,524	7,102	415,422
Amounts recoverable from reinsurers	99,478	0	99,478
Net deferred tax asset	308,600	114,932	193,668
Electronic data processing equipment and software	35,517	0	35,517
Furniture and equipment	3,928	3,928	0
Receivables from parent, subsidiaries and affiliates	237,047	0	237,047
Prepaid expenses and retainers	418,036	418,036	0
Other receivables	48,659	0	48,659
Deposit	8,619	0	8,619
Totals	\$14,076,695	\$606,382	\$13,470,313

LIABILITIES, SURPLUS AND OTHER FUNDS

As of December 31, 2018

Known claims reserve	\$ 112,930
Statutory premium reserve	5,224,567
Other expenses	160,801
Taxes, licenses and fees	126,117
Borrowed money	2,602,058
Premiums and other consideration received in advance	23,459
Amounts withheld or retained by company	600
Payable to parent, subsidiaries and affiliates	13,952
Total liabilities	\$ 8,264,484
Common capital stock	1,000,000
Surplus notes	596,965
Gross paid in and contributed surplus	3,419,342
Unassigned funds (surplus)	189,522
Total capital and surplus	\$ 5,205,829
Total Liabilities, Capital and Surplus	\$ 13,470,313

SUMMARY OF OPERATIONS

For the Year Ending December 31, 2018

Title insurance premiums earned	\$10,246,144
Other title fees and service charges	1,571,720
Total operating income	<u>\$11,817,864</u>
Losses and loss adjustment expenses incurred	299,580
Operating expenses incurred	11,694,912
Total operating expenses	<u>\$11,994,492</u>
Net operating gain	(176,628)
Net investment income earned	86,426
Net realized capital gains (NOTE 1)	43,911
Net investment gain	<u>\$130,337</u>
Miscellaneous income	(24,036)
Net income (pre-tax)	<u>(\$70,327)</u>
Federal and foreign income taxes incurred	0
Net income	<u><u>(\$70,327)</u></u>

RECONCILIATION OF SURPLUS

As of December 31, 2018

	2015	2016	2017	2018
Capital and surplus, prior year	\$3,026,550	\$3,325,617	\$3,715,359	\$3,394,563
Net income	309,454	452,667	(332,050)	(70,327)
Change in net unrealized capital gains	(47,966)	12,879	22,155	74,359
Change in net deferred income tax	57,300	15,100	(111,500)	62,500
Change in nonadmitted assets	(19,721)	(90,904)	100,599	(315,999)
Change in surplus notes	23,483	(46,965)	23,482	23,482
Paid in	0	0	0	2,060,733
Change in accrued interest	(23,483)	46,965	(23,482)	(23,482)
Change in surplus	<u>299,067</u>	<u>389,742</u>	<u>(320,796)</u>	<u>1,811,266</u>
Capital and surplus, current year	<u><u>\$3,325,617</u></u>	<u><u>\$3,715,359</u></u>	<u><u>\$3,394,563</u></u>	<u><u>\$5,205,829</u></u>

COMMENTS ON FINANCIAL STATEMENT ITEMS

NOTE 1:	Properties held for sale	\$165,000
	Net realized capital loss	217,065

Statements of Statutory Accounting Principles (SSAP) 40R, *Real Estate Investments*, governs the reporting of real estate, including properties held for sale. SSAP 90, *Impairment or Disposal of Real Estate Investments*, governs the reporting of real estate impairments. SSAP 40R requires that properties held for sale be reported at the lower of depreciated cost or fair value. SSAP 90 requires that a realized loss be reported in the Summary of Operations when the carrying value of properties held for sale exceeds the fair value. On December 18, 2018, the Company acquired a property through foreclosure and recorded its value as \$425,976. An appraisal of the property assessed its value at \$165,000. An examination change was made in the amount \$260,976 to reduce the reported value of the property held for sale to its fair value.

ANALYSIS OF CHANGES TO SURPLUS

Reported surplus at December 31, 2018		\$ 5,205,829
	<u>Increase</u>	<u>Decrease</u>
Properties held for sale		\$ 260,976
Net realized capital loss	\$ 260,976	
Net decrease to surplus		<u>(260,976)</u>
Adjusted surplus at December 31, 2018		<u>\$ 4,944,853</u>

GENERAL COMMENTS AND/OR RECOMMENDATIONSCorporate Records (page 3)

The Board of Director meeting minutes did not document the election of officers or the approval of intercompany agreements for the current exam period. The shareholder meeting minutes did not document the appointment of directors in 2018. The Company should ensure that all significant corporate events are documented in the appropriate meeting minutes.

Assets (page 9)/Summary of Operations (page 10)

The reported value of the Company's property held for sale was adjusted in accordance with the requirements of SSAP 40R, *Real Estate Investments* and SSAP 90, *Impairment or Disposal of Real Estate Investments*. The Company should ensure that it complies with the requirements of SSAP 40R, *Real Estate Investments*, and SSAP 90, *Impairment or Disposal of Real Estate Investments*, when reporting real estate investments.

Reporting Errors

During the examination, multiple instances of non-compliance with Missouri statutes and regulations, NAIC Annual Statement Instructions and Statements of Statutory Accounting Principles were identified. The Company should ensure that it fully complies with the reporting requirements of applicable statutes, regulations, NAIC Annual Statement Instructions and Statements of Statutory Accounting Principles.


ACKNOWLEDGMENT

The assistance and cooperation extended by the officers and staff of Agents National Title Insurance Company during the course of this examination is hereby acknowledged and appreciated. In addition to the undersigned, Andy Balas, CFE, AES, CPA; Doug Daniels, CFE, CPA; and, Josh Nash, AFE, CPA; examiners for the Department, participated in this examination.

VERIFICATION

State of Missouri)
)
County of St. Louis)


I, Thomas J. Cunningham, on my oath swear that to the best of my knowledge and belief the above examination report is true and accurate and is comprised of only facts appearing upon the books, records or other documents of the Company, its agents or other persons examined or as ascertained from the testimony of its officers or agents or other persons examined concerning its affairs and such conclusions and recommendations as the examiners find reasonably warranted from the facts.



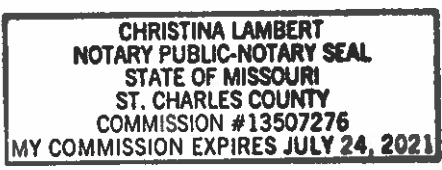
Thomas J. Cunningham, CFE, CPA
Examiner-in-Charge
Missouri Department of Insurance,
Financial Institutions and Professional Registration

Sworn to and subscribed before me this 14th day of August 2019

My commission expires:
7/24/21



Notary Public



SUPERVISION

The examination process has been monitored and supervised by the undersigned. The examination report and supporting workpapers have been reviewed and approved. Compliance with NAIC procedures and guidelines as contained in the Financial Condition Examiners Handbook has been confirmed.

A handwritten signature in blue ink, appearing to read "Michael Shadowens", is written over a horizontal line.

Michael Shadowens, CFE
Assistant Chief Financial Examiner, St. Louis
Missouri Department of Insurance, Financial
Institutions and Professional Registration