

STATE OF MISSOURI



DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION

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

In re:)
Stewart Title Guarantee Company (NAIC #50121)) Investigation No. 11014-50121-PC

ORDER OF THE DIRECTOR

NOW, on this 19 day of July, 2012, Director John M. Huff, after consideration and review of the market conduct investigation of Stewart Title Guarantee Company (NAIC #50121), (hereafter referred to as "the Company") investigation number 11014-50121--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. 2011) 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.

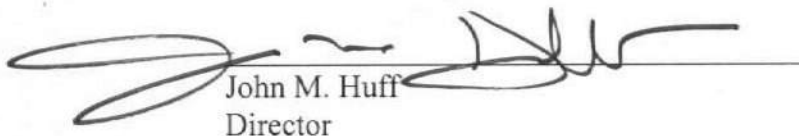
IT IS FURTHER ORDERED that the Company shall not engage in any of the violations of law and regulations set forth in the Stipulation and shall implement procedures to place the Company in full compliance with the requirements in the Stipulation and the statutes and regulations of the State of Missouri 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 \$128,000, 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 19th day of JULY, 2012.


John M. Huff
Director



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

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

TO: Stewart Title Guaranty Company
1980 Post Oak Blvd.
Suite 710
Houston, TX 77056

RECEIVED
JUL 03 2012

RE: Stewart Title Guaranty Company (NAIC #50121)
Missouri Market Conduct Investigation #11014-50121-PC

MO. DEPT. OF INSURANCE,
FINANCIAL INSTITUTIONS &
PROFESSIONAL REGISTRATION

**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 Stewart Title Guaranty Company. (NAIC # 50121), (hereafter referred to as "Stewart Title"), 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, Stewart Title has been granted a certificate of authority to transact the business of insurance in the State of Missouri; and

WHEREAS, the Department conducted a Market Conduct Investigation of Stewart Title and prepared report number 11014-50121--PC; and

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

1. In eighty seven (87) instances, Stewart Title terminated an agency relationship but failed to report the termination and the reasons for the termination to the Director in seven days in violation of §381.018.5¹;

¹ All references, unless otherwise noted, are to Missouri Revised Statutes 2000, as amended.

2. In six (6) instances, Stewart Title terminated an agency relationship and reported the termination to the Director, but failed to report the termination within 7 days in violation of §381.018.5;

3. In forty one (41) instances, Stewart Title failed to perform on-site audits of its agents for 2009 and/or provide copies of the audit reports to the Director within 120 days in violation of §§381.023.1 and .4;

4. In twenty five (25) instances, Stewart Title failed to perform an on-site audit of its agent for 2010 and/or provide copies of the audit reports to the Director within 120 days in violation of §§381.023.1 and .4;

5. In twenty four (24) instances, Stewart Title performed on-site audits of its agents for 2010 but failed to provide those audits to the Director within 120 days of the completion of the audit in violation of §381.023.4 and 20 CSR 500-7.080 (3) (B).

WHEREAS, Stewart Title 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. Stewart Title agrees to take corrective action to assure that the errors noted in the above-referenced market conduct investigation report do not recur; and

2. Stewart Title agrees to file documentation with the Director within 90 days of the entry of a final order closing this investigation of all remedial actions taken by it to implement compliance with the terms of this Stipulation.

WHEREAS, Stewart Title, 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, Stewart Title hereby agrees to the imposition of the ORDER of the Director and as a result of Market Conduct Investigation #11014-50121-PC further agrees, voluntarily and knowingly to surrender and forfeit the sum of \$128,000.

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 Stewart Title to transact the business of insurance in the State of Missouri or the imposition of other sanctions, Stewart Title 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 \$128,000, such sum payable to the Missouri State School Fund, in accordance with §374.280.

DATED: 6/29/12



President
Stewart Title Guaranty Company