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MAY 10 2018

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

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

IN RE: GREAT AMERICAN CLOSING COMPANY, TRACKING ID 310550
LLC DBA GREAT AMERICAN TITLE
INSURANCE AGENCY
510C W. BATTLEFIELD
SPRINGFIELD, MO 65807

VOLUNTARY FORFEITURE AGREEMENT

It is hereby agreed by Great American Closing Company, LLC dba Great American Title Insurance Agency and the Division of Consumer Affairs of the Department of Insurance, Financial Institutions and Professional Registration, as follows:

WHEREAS, Chlora Lindley-Myers, 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 Division of 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, Great American Closing Company, LLC dba Great American Title Insurance Agency ("GAT") has a business entity insurance producer license with the Department, pursuant to Chapter 375, RSMo;

WHEREAS, the Division has received information concerning GAT's failure to:

- Protect consumer's non-public information ("NPI"), private identifiable information ("PII") and personal private information ("PPI") pursuant to 20 CSR 100-6.100 (3) (B) 1;
- Disclose the findings of the search and examination of records relating to a title or inspections or survey of the property insured for use of blanket exceptions on the title insurance policy to insured that were not filed with Department and violating Section 381.085.4, RSMo (Supp. 2013); and
- State premium on the title insurance policy issued inconsistent with rates filed with the Department in violation of Section 381.181.2, RSMo (Supp. 2013);

Additionally, the Division has received information that suggests GAT, materially aided an affiliated entity to solicit an insurance product after GAT shared NIP, PII and PPI from a non-affiliated financial institution received for real estate settlement services without proper notice or request from the consumer consistent with 20 CSR 00-6.100(3)(B)1 pursuant to Section 381.045.1, RSMo (Supp. 2013) and such conduct subjects GAT to discipline by the Director;

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

NOW, THEREFORE, in lieu of any recommendation or initiation by the Division of any action based on the violations cited in this Agreement, and after being afforded the opportunity to consult legal counsel, GAT does hereby voluntarily and knowingly surrender and forfeit the sum of one thousand dollars (\$1,000.00), such sum to be paid into the State School Moneys Fund pursuant to Sections 374.046 and 374.280, RSMo.

GAT 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 May 11, 2018.

The parties agree that, nothing in this Agreement shall preclude the Director or the Division from offering the alleged conduct by GAT contained in this Agreement in any future allegation of a different violation by GAT of 20 CSR 100-6.100(3) (B) 1; Sections 381.045.1; 381.085.4; and 381.181.2, RSMo (Supp. 2013) as evidence for the purpose of showing that:

- a) the acts described herein, together with such additional violations, form part of a conduct, a business practice, or other such series of similar violations; or
- b) that such additional violations are committed knowingly, intentionally or in conscious disregard of the law.

DATED: 5-8-18

Great American Closing Company,
LLC dba Great American Title
Company, LLC
License No. 8020841
By: [Signature]
Its: President

DATED: 5/16/18

[Signature: Carrie Couch]
Carrie Couch, Director
Division of Consumer Affairs

DATED: 17 May 2018

[Signature: Chlora Lindley-Myers]
Chlora Lindley-Myers, 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