



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

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

RECEIVED

NOV 24 2015

IN RE: WFG LENDER SERVICES, LLC  
183 INDUSTRY DRIVE  
PITTSBURGH, PA 15275

TRACKING ID 250566  
DEPT OF INSURANCE,  
FINANCIAL INSTITUTIONS &  
PROFESSIONAL REGISTRATION

VOLUNTARY FORFEITURE AGREEMENT

It is hereby agreed by WFG Lender Services, LLC ("WFG Lender") 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, WFG Lender 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 WFG Lender's failure to notify the Director of a change of business status pursuant to Section 375.018.7, RSMo (Supp. 2013); failure to timely record the deed pursuant to Section 381.026.1, RSMo (Supp. 2013); failure to conduct a date-down prior to closing the transaction, recording the deed and issuing the Owner's Title Insurance policy, which is inconsistent with sound underwriting practices pursuant to Section 381.071.1(2), RSMo (Supp. 2013); failed to provide Notice of Closing or Settlement Risk (T-3 form) pursuant to 20 CSR 500-7.060(2)(A) and Section 381.022.5, RSMo (Supp. 2013); and WFG Lender materially aiding two employees to violate Chapter 381 pursuant to Section 375.145.1, RSMo (Supp. 2013) when the employees handling escrows, settlements or closings, tasks requiring a valid insurance producer license pursuant to Section 381.115, RSMo (Supp. 2013), subjecting WFG Lender to an enforcement action by the Director;

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

AND WHEREAS, WFG Lender, acknowledges and admits for purposes of this Agreement and for purposes of any future action by the Director or the Consumer Affairs Division based on any additional violation of the insurance laws or regulations by WFG Lender, in which action the Director or the Consumer Affairs Division alleges that the violations described herein form part of a course of conduct, a business practice, or other such series of similar violations, or that future violations by WFG Lender are committed

negligently, inadvertently and without a conscious disregard of the law, that it failed to notify the Director of a change of business status pursuant to Section 375.018.7, RSMo (Supp. 2013); failed to timely record the deed pursuant to Section 381.026.1, RSMo (Supp. 2013); failed to conduct a date-down prior to closing the transaction, recording the deed and issuing the Owner's Title Insurance policy pursuant to Section 381.071.1(2), RSMo (Supp. 2013); failed to provide Notice of Closing or Settlement Risk (T-3 form) pursuant to 20 CSR 500-7.060(2)(A) and Section 381.022.5, RSMo (Supp. 2013); and WFG Lender materially aiding two employees to violate Chapter 381 pursuant to Section 375.145.1, RSMo (Supp. 2013) when the employees handling escrows, settlements or closings, tasks requiring a valid insurance producer license pursuant to Section 381.115, 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, WFG Lender does hereby voluntarily and knowingly surrender and forfeit the sum of one thousand four hundred dollars (\$1,400.00), such sum to be paid into the State School Moneys Fund pursuant to Sections 374.046 and 374.280, RSMo.

WFG Lender 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 November 20, 2015.

The parties agree that, should the Director or the Division in the future allege an additional violation of the insurance laws or regulations by WFG Lender, nothing in this Agreement shall preclude the Director or the Consumer Affairs Division from

introducing WFG Lender'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: November 17, 2015

WFG Lender Services, LLC

By: Donald A. O'Neill  
Its: SVP, Chief Compliance Officer  
License No. 8022437

DATED: 11/25/15

Carrie Couch

Carrie Couch, Director  
Consumer Affairs Division

DATED: 11/30/15

John M. Huff

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