

**FILED**  
**DEC 30 2020**  
Department of Insurance  
State of Idaho

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE**

**STATE OF IDAHO**

In the Matter of:

NEXTITLE NORTH IDAHO, LLC

Idaho Title Agency License No. 705061

Docket No. 18-3885-20

**ORDER ADOPTING REPORT  
OF EXCEPTION EXAMINATION  
AS OF DECEMBER 31, 2019**

The State of Idaho, Department of Insurance (“Department”), having conducted an examination of the affairs, transactions, assets, tract indexes, abstract records, and any other records of NEXTITLE NORTH IDAHO, LLC (“NEXTITLE”), to ascertain compliance with title 41, Idaho Code, and related rules, pursuant to Idaho Code §§ 41-2710(7) and 41-219(1) and (5), hereby alleges the following facts that constitute a basis for issuance of an order, pursuant to Idaho Code § 41-227(5)(a), adopting the Report of Exception Examination for the Period January 4, 2019, to December 31, 2019, of NexTitle North Idaho, LLC, as of December 31, 2019 (“Report”), as filed.

**FINDINGS OF FACT**

1. NEXTITLE is a title agency licensed by the Department to transact title insurance in Kootenai County, Idaho, under Title Agency License No. 705061.

2. The Department completed an examination of NEXTITLE, pursuant to Idaho Code §§ 41-2710(7) and 41-219(1) and (5) on or about November 4, 2020. The Department's findings are set forth in the Report.

3. Pursuant to Idaho Code § 41-227(4), a copy of the Report was filed with the Department on November 4, 2020, and was transmitted to NEXTITLE on the same date. A copy of the Report is attached hereto as Exhibit A.

4. Pursuant to Idaho Code § 41-2710(7), NEXTITLE had twenty-eight (28) days from service of the Report within which to review, comment, or request a hearing on the Report.

5. No written submissions or rebuttals with respect to any matters contained in the Report were received by the Department from NEXTITLE.

#### **CONCLUSIONS OF LAW**

6. Idaho Code § 41-227(5) provides that, after expiration of "the period allowed for the receipt of written submissions or rebuttals, the Director [of the Department] shall fully consider and review the report, together with any written submissions or rebuttals and relevant portions of the examiner's work papers" and shall enter an order adopting the report of examination as filed or with modifications or corrections, rejecting the report and reopening the examination, or calling for an investigatory hearing.

7. Having fully considered the Report, the Director concludes that, with regard to the matters examined and information provided by NEXTITLE, the comments, findings, and recommendations contained in the Report, including the Examiner's determination of violations or noncompliance by NEXTITLE and corrective actions to be taken identified on pages 12 and 13 of the Report, are appropriate and are incorporated herein as if set forth in full.

**ORDER**

NOW, THEREFORE, based on the foregoing, IT IS HEREBY ORDERED that the Report of Exception Examination for the Period January 4, 2019, to December 31, 2019, of NexTitle North Idaho, LLC, as of December 31, 2019, is hereby ADOPTED as filed, pursuant to Idaho Code § 41-227(5)(a).

IT IS FURTHER ORDERED, pursuant to Idaho Code §§ 41-2710(7) and 41-227(8), that the adopted Report is a public record and shall not be subject to the exemptions from disclosure provided in chapter 1, title 74, Idaho Code.

IT IS FURTHER ORDERED, pursuant to Idaho Code § 41-227(6)(a), that, within thirty (30) days of the issuance of the adopted Report, NEXTITLE shall file with the Department's Examiner Title & Market Insurance Specialist affidavits executed by each of its directors or, if none, its principal officers, stating under oath that they have received a copy of the adopted Report and related orders.

IT IS FURTHER ORDERED that, due to NEXTITLE's violation of IDAPA 18.05.01.014.01<sup>1</sup> by accepting title insurance or escrow orders on four (4) occasions from an applicant who was referred by a producer of title business with a financial interest in NEXTITLE without the required written and signed disclosure, no later than thirty (30) days from the date of entry of the Final Order adopting the Report, NEXTITLE shall revise its processes and fully implement procedures to ensure that such future title insurance or escrow orders will include the required written and signed disclosure.

IT IS FURTHER ORDERED that, due to the failure of producers of title business with a financial interest in NEXTITLE to provide consumers with the above-described written disclosure

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<sup>1</sup> IDAPA 18.01.39.011, as cited in the Report, was re-designated as IDAPA 18.05.01.014, effective March 20, 2020.

at the time of entry into the sale or purchase contract on seven (7) occasions, as required by IDAPA 18.05.01.014.02, no later than thirty (30) days from the date of entry of the Final Order adopting the Report, NEXTITLE shall revise its processes and fully implement procedures to ensure that producers of title business with a financial interest in NEXTITLE shall provide the required written disclosure to consumers at the time of entry into the sale or purchase contract, in compliance with IDAPA 18.05.01.014.

IT IS FURTHER ORDERED that, due to NEXTITLE's providing a food item as a self-promotional item on one (1) occasion, in violation of IDAPA 18.05.01.031.04.a<sup>2</sup>, no later than thirty (30) days from the date of entry of the Final Order adopting the Report, NEXTITLE shall revise its processes and fully implement procedures to ensure that future distributions of self-promotional items are in compliance with IDAPA 18.05.01.031.04.a.

IT IS FURTHER ORDERED that, due to NEXTITLE's providing non-title services to a producer of title business on three (3) occasions without charging for and receiving a commensurate fee, in violation of IDAPA 18.05.01.031.01<sup>3</sup>, no later than thirty (30) days from the date of entry of the Final Order adopting the Report, NEXTITLE shall revise its processes and fully implement procedures to ensure that future non-title services are not provided without charging for and receiving a fee commensurate for the services provided.

IT IS FURTHER ORDERED that, any waiver of penalties for violations or noncompliance set forth above notwithstanding, the Department retains the right to impose new penalties based on any future findings of the same violations.

**IT IS SO ORDERED.**

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<sup>2</sup> IDAPA 18.01.56.014.01, as cited in the Report, was re-designated as IDAPA 18.05.01.031.04 a, effective March 20, 2020.

<sup>3</sup> IDAPA 18.01.56 (Exhibit 1), as cited in the Report, was re-designated as IDAPA 18.05.01.031.01 (Exhibit 1), effective March 20, 2020.

DATED and EFFECTIVE this 25<sup>th</sup> day of December, 2020.

STATE OF IDAHO  
DEPARTMENT OF INSURANCE

  
DEAN L. CAMERON  
Director

## NOTIFICATION OF RIGHTS

This is a final order of the agency. Any party may file a motion for reconsideration of this final order within fourteen (14) days of the service date of this order. The agency will dispose of the motion for reconsideration within twenty-one (21) days of its receipt, or the motion will be considered denied by operation of law. See Idaho Code § 67-5246(4).

Any such motion for reconsideration shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director  
Idaho Department of Insurance  
700 W. State Street, 3<sup>rd</sup> Floor  
P.O. Box 83720  
Boise, ID 83720-0043

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order or orders previously issued in this case may file a petition for judicial review in the district court of the county in which:

- i. A hearing was held;
- ii. The final agency action was taken;
- iii. The party seeking review of the order resides, or operates its principal place of business in Idaho; or
- iv. The real property or personal property that was the subject of the agency action is located.

A petition for judicial review must be filed within twenty-eight (28) days of: (a) the service date of this final order, (b) the service of an order denying motion for reconsideration, or (c) the failure within twenty-one (21) days to grant or deny a motion for reconsideration, whichever is later. See Idaho Code § 67-5273. The filing of a petition for judicial review does not itself stay the effectiveness or enforcement of the order under appeal. Idaho Code § 67-5274.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 30<sup>th</sup> day of December, 2020, I caused a true and correct copy of the foregoing ORDER ADOPTING REPORT OF EXCEPTION EXAMINATION AS OF DECEMBER 31, 2019, to be served upon the following by the designated means:

NexTitle North Idaho, LLC  
608 Northwest Blvd. Ste. 101  
Coeur d'Alene, ID 83814-2174

- first class mail  
 certified mail  
 email

James Galbraith  
General Counsel  
NexTitle North Idaho, LLC  
[jgalbraith@nextitle.com](mailto:jgalbraith@nextitle.com)

- first class mail  
 certified mail  
 email

Edith L. Pacillo  
Lead Deputy Attorney General  
Idaho Department of Insurance  
P.O. Box 83720  
Boise, ID 83720-0043  
[edith.pacillo@doi.idaho.gov](mailto:edith.pacillo@doi.idaho.gov)

- first class mail  
 certified mail  
 email

  
\_\_\_\_\_  
Pamela Murray



REPORT OF EXCEPTION EXAMINATION

For the Period January 4, 2019 to December 31, 2019

Of

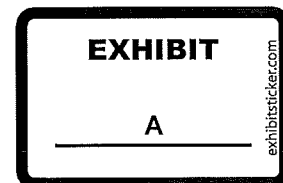
NexTitle North Idaho LLC.

(A title agent corporation - license #705061 – Kootenai County)

As of

December 31, 2019

*Equal Opportunity Employer*





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Boise, Idaho  
November 4, 2020

The Honorable Dean L. Cameron  
Director of the Idaho Department of Insurance  
700 West State Street  
Boise, Idaho 83720

Sir:

Pursuant to your instructions and in conformity with Idaho Code §§ 41-219, 41-220, and 41-2713, an examination has been made of the administrative affairs, books, records and financial condition of;

NexTitle North Idaho LLC.  
608 Northwest Blvd. Ste #101  
Coeur d' Alene, Idaho 83814-2174  
License #705061 – Kootenai County

Hereinafter referred to as the “Agent”.

The following Report of Exception Examination is respectfully submitted.

## **FOREWORD**

This is an exception examination report of the practices and procedures of NexTitle North Idaho, LLC, an Idaho Title Agent licensed in Kootenai County. However, failure to identify or criticize specific products, procedures or files does not constitute approval thereof by the Idaho Department of Insurance (the Department).

The examination was conducted remotely from the offices of the Department located at 700 West State Street, 3<sup>rd</sup> Floor in Boise, Idaho. In performing this examination, the examiner(s) reviewed a sample of the agent's procedures, files, and documentation. Some noncompliant practices may not have been discovered during this examination. As such, this report may not fully reflect all of the procedures and practices of the Agent.

During the examination, the examiner(s) may cite violations made by the Agent. Statutory citations are as of the period under examination unless otherwise noted. The goal of the examination team was to produce an examination report that reflects agreement in content with the agent. The report indicates where agreement was not possible.

The final examination report documents consist of the examiners' report, the Agent's response, and any administrative actions based on the findings of the Idaho Department of Insurance.

## **PURPOSE AND SCOPE OF EXAMINATION**

The purpose of this examination is to determine compliance with applicable Idaho Statutes, Idaho Department of Insurance regulations, and promulgated rules issued by the Department. In addition, examiners may have documented practices and procedures that did not appear to be in the best interest of Idaho insurance consumers.

The period covered by this examination is January 4, 2019 through December 31, 2019. Specific areas examined include operations/management, claims, advertising and marketing, title file review and escrow fiduciary account and file review.

The authority of the Idaho Department of Insurance to perform this examination includes, but is not limited to, Idaho Code §41-2710(7), which grants authority to the Idaho Department of Insurance to regular examination of the tract indexes, abstract records, and any other records to ascertain compliance with title 41, Idaho Code, and related rules, of a title agent not more than every fifth year, unless the agent otherwise requests or the director has cause to believe the same does not comply with this chapter or the rules thereunder.

## **HISTORY AND DESCRIPTION**

NexTitle North Idaho, LLC. was incorporated on June 1, 2018 through the Idaho Secretary of State's office. They were licensed with the Idaho Department of Insurance and began operations on January 4, 2019.

## **PRIOR EXAMINATION**

NexTitle North Idaho, LLC was licensed and began operations on January 4, 2019 so there is no previous examination. No exceptions were noted as a result of this portion of the examination.

## SUMMARY OF FINDINGS AND RECOMMENDATIONS

### I. OPERATIONS AND MANAGEMENT

The examination included a review of the agent's operations and management. The focus of this section of the examination includes review of management and control, contracting authority, surety bond, claims, and financial interests of the title entity management and ownership.

#### A. MANAGEMENT, CONTROL AND FINANCIAL INTERESTS IDAPA 18.01.39.011, 012 & 013

As of August 21, 2020, the Idaho Secretary of State lists Cogency Global, Inc. as the current Registered Agent. Nextitle Holdings is listed as the LLC manager and member. The agent has a 46.7% investor interest by entities and individuals licensed by the Idaho Real Estate Commission.

During the examination, the following exceptions regarding disclosure by producer of title business were noted:

<b>Department File Number</b>	<b>Date Purchase and Sale Agreement Signed</b>	<b>Date Buyer Disclosure Signed</b>	<b>Date Seller Disclosure Signed</b>	<b>Date File Opened</b>
1	February 2, 2019	February 4, 2019	February 6, 2019	February 2, 2019
2	February 13, 2019	February 19, 2019	February 20, 2019	February 14, 2019
3	February 25, 2019	March 2, 2019	March 4, 2019	March 4, 2019
4	March 27, 2019	March 28, 2019	March 28, 2019	March 28, 2019
5	May 6, 2019	May 7, 2019	May 8, 2019	May 6, 2019
6	May 25, 2019	May 28, 2019	May 29, 2019	May 30, 2019
7	July 12, 2019	July 12, 2019	July 17, 2019	July 15, 2019

IDAPA 18.01.39.011<sup>1</sup> states that *"No title entity may accept any order for; issue a title commitment, guarantee, title insurance policy for; or provide services, including but not limited to escrow closing and foreclosure services, to; an applicant if it knows or has reason to believe that the applicant was referred by a producer of title business, where the producer of title business has a financial interest in the title entity to which the business is referred unless the producer of title business has disclosed to the applicant the financial interest of the producer of title business. The disclosure must be made in writing and contain the items required in Section 012 of this rule."* The Title Agent was in violation of IDAPA 18.01.39.011 in files #1, #2, #5 and #7 by accepting an order from an applicant who was referred by a producer of title business, where the producer of title business has a financial interest in the Title Agent, without a written disclosure signed by the applicant.

IDAPA 18.01.39.012.01<sup>2</sup> states in part that the disclosure *"Shall be provided to the applicant at the time the sell and/or purchase contract is entered into."* The Title Agent was in violation of IDAPA 18.01.39.012(01) in all files as the producer of title business with a financial interest in the Title Agent

<sup>1</sup> IDAPA 18.01.39.011 was re-designated as IDAPA 18.05.01.014.01, effective March 20, 2020.

<sup>2</sup> IDAPA 18.01.39.012.01 was re-designated as IDAPA 18.05.01.014.02, effective March 20, 2020.

did not provide the disclosure required in Section 011 at the time the sell and/or purchase contract was entered into.

## **Recommendation**

It is recommended that the Title Agent provide in writing their proposed changes to procedures in order to maintain compliance with disclosure requirements by producers of title business having a financial interest in the Title Entity. No administrative sanctions or penalties are recommended at this time as this is the first instance of these violations noted in an examination for this Title Agent.

### **B. CONTRACTING AUTHORITY** **Idaho Code § 41-2710(2)**

This agent has underwriting contracts with Old Republic National Title Insurance Company (ORNTIC) and Stewart Title Guaranty Company (STGC). The underwriting contracts require a high liability approval of \$1,000,000.00 for ORNTIC and a high liability approval of \$3,000,000.00 for STGC. No exceptions were noted as a result of this portion of the examination.

### **C. SURETY BOND** **Idaho Code §§ 41-2710(6), 2711** **IDAPA 18.01.25.011.08 & 09**

The Idaho Department of Insurance has on file surety bond #106988583 in the amount of \$50,000.00 issued by Travelers Casualty and Surety Company of America on behalf of the agent. We confirmed during the examination that this bond is currently active. No exceptions were noted as a result of this portion of the examination.

### **D. CLAIMS** **Idaho Code § 41-2708(1) & (2)**

The agent reported no claims during the examination period. There does not appear to be any problems with the title plant. No exceptions were noted as a result of this portion of the examination.

## II. ADVERTISING AND MARKETING

**Idaho Code § 41-2708(3) & (4)**  
**IDAPA 18.01.39.014 & 18.01.56**

The examination included a review of the agent's marketing and sales practices. A general ledger for each year under examination for all accounts involving contributions, donations, sales expenses, travel and meal expenses, Title agent/staff function expenses, as well as samples of listing packages or property profiles were requested and received. After a cursory review of the general ledgers, samples were picked within our examination parameters. Supporting documents for the samples were requested, received, and reviewed.

### Self-Promotional Items

During the examination, the following exception regarding distributing self-promotional items was noted:

In June of 2019 staff member Kristy Casley provided an edible gift as a thank you to a client in the amount of \$85.84.

IDAPA 18.01.56.014.01<sup>3</sup> states that "*A title entity may distribute self-promotional items having an acquisition value of less than twenty-five dollars (\$25) to producers of title business, consumers, and members of the general public. These self-promotional items are limited to novelty gifts, advertising novelties, and generic business forms and specifically do not include food, beverages, gift certificates, gift cards, or other items that have a specific monetary value on their face or that may be exchanged for any other item having a specific monetary value.*" The Title Agent was in violation of IDAPA 18.01.56.014.01 by providing a food item as a self-promotional item.

### Providing Non-Title Services

During the examination, the following exceptions regarding providing non-title services, or similar benefit, to a producer of title business, without charging for and receiving a fee commensurate for services provided.

<b>Date of Service</b>	<b>Violation of IDAPA 18.01.56 Exhibit 1(7)</b>
June 2019	The Agent provided 456 printed postcards including mail processing & postage totaling \$362.59 from MinutePress to TJB Real Estate Counselors, a producer of title business, without charging for and receiving a fee until September 2020.
July 2019	The Agent provided 401 printed postcards including mail processing & postage totaling \$330.34 from MinutePress to TJB Real Estate Counselors, a producer of title business,

<sup>3</sup> IDAPA 18.01.56.014.01 was re-designated as IDAPA 18.05.01.031.04(a), effective March 20, 2020.

	without charging for and receiving a fee until September 2020.
August 2019	The Agent provided 353 printed postcards including mail processing & postage totaling \$284.90 from MinutePress to TJB Real Estate Counselors, a producer of title business, without charging for and receiving a fee until September 2020.

IDAPA 18.01.56 Exhibit 1(7)<sup>4</sup> states in part that “A title entity will not provide, or offer to provide, non-title services (example: computerized bookkeeping, forms management, computer programming, trust accounting) or any similar benefit to a producer of title business, without charging for and receiving a fee commensurate for services provided.” The Title Agent was in violation of IDAPA 18.01.56 Exhibit 1(7) by providing a non-title service to a producer of title business without charging for and receiving a fee commensurate for services provided.

**Recommendation**

It is recommended that the Title Agent provide in writing their proposed changes to procedures in order to maintain compliance with permitted advertising and marketing business expenses. No administrative sanctions or penalties are recommended at this time as this is the first instance of these violations noted in an examination for this Title Agent.

**III. TITLE FILE REVIEW  
Idaho Code §§ 41-2702, 2708 & 2709  
IDAPA 18.01.25 & 18.01.56.017 & Exhibit 1(9)**

The title department is managed by Jessica Stephens and consists of one title officer. This location owns its base title plant, and the maintenance and updates are leased from Northwest Title, LLC. A sample of title files were reviewed within the parameters of our examination for the rates charged, the correct insured amount of the owner’s and mortgagee’s policies, proper countersignatures, double sales, proper use of the Standards of Liability and liens and encumbrance rules, cancellation fees, and unique kind or class of risk and proper disclosure of producers of title insurance. No exceptions were noted as a result of this portion of the examination.

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<sup>4</sup> IDAPA 18.01.56 Exhibit 1(7) was re-designated as IDAPA 18.05.01 Exhibit 1(7), effective March 20, 2020.



#### **IV. ESCROW FIDUCIARY ACCOUNTS AND FILE REVIEW**

The Title Agent's Escrow Department is managed by Kristy Anstine and is comprised of her, two (2) escrow officers and two (2) escrow assistants.

##### **A. FIDUCIARY ACCOUNTS IDAPA 18.01.25.011.04, 05 & 10**

This examination included a review of the fiduciary accounts utilized during the examination period. The accounts were reviewed for correct labeling, separation from operating funds, reconciliation and negative balances. The accounts are balanced daily and reconciled on a monthly basis by SoftPro and Jessica Rasmussen. Monthly reconciliations are reviewed by Jace Perry. No exceptions were noted as a result of this portion of the examination.

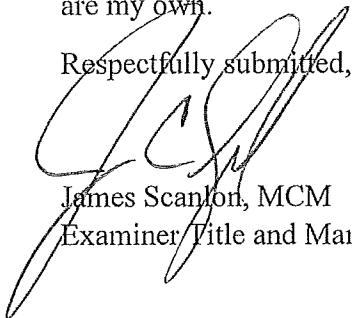
##### **B. ESCROW FILE REVIEW Idaho Code § 41-2705(3) IDAPA 18.01.25.011 & 12, 18.01.56.017**

A sample of the escrow files were reviewed within the parameters of our examination for adequate written instructions conformity to the written instructions, rates charged as filed, signed settlement statements, receipt and disbursement ledgers, evidence of receipts and disbursements made, file overdrafts and business interests of escrow officers. No exceptions were noted as a result of this portion of the examination.

## CONCLUSION

I certify and attest that I have examined the Title Agent's tract indexes, abstract records, as well as other records, and the operation of the Title Agent's business and other matters relevant to the affairs of the Title Agent. I further certify that I have no relationship, other than in my capacity as examiner and/or regulator, with the Title Agent or its employees and that no conflict of interest exists that would prevent me from conducting the examination. I acknowledge the assistance and cooperation of the Title Agent's employees during the examination. Based on my examination, I prepared this Examiner's Report of Exceptions (the "Report") in accordance with Idaho Code § 41-2710(7). I confirm that the findings, conclusions, and recommendations contained in this report are my own.

Respectfully submitted,



James Scanlon, MCM  
Examiner Title and Market Insurance Specialist

## **PENALTY, STIPULATIONS AND APPEAL NOTIFICATION**

This matter comes before the Idaho Department of Insurance (“Department”) as a result of this Report of Exception Examination (“Examination”). The Department has fully considered and reviewed this Examination, any written submissions and rebuttals provided by the Title Agent in response to the Examination and the recommendations of the Examiner.

The Department makes the following findings of fact and imposes penalties and stipulations:

1. The Title Agent, on four (4) occasions, accepted title insurance and/or escrow orders from an applicant who was referred by a producer of title business, where the producer of title business has a financial interest in the Title Agent, without a written disclosure by producer of title business signed by the applicant. These actions constitute violations of IDAPA 18.01.39.011.

No later than thirty (30) days from the date the Final Order is adopted, the Title Agent shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future title insurance and/or escrow orders received from applicants, who were referred by a producer of title business having a financial interest in the Title Agent, have proper written disclosures signed by the applicants.

2. Producers of title business with a financial interest in the Title Agent, on seven (7) occasions, did not provide the disclosure required in IDAPA 18.01.39.011 at the time the sell and/or purchase contract was entered into. These actions constitute violations of IDAPA 18.01.39.012.01.

No later than thirty (30) days from the date the Final Order is adopted, the Title Agent shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that in the future, producers of title business with a financial interest in the Title Agent, provide proper disclosure required in IDAPA 18.01.39.011 at the time the sell and/or purchase contract is entered into.

3. The Title Agent, on one (1) occasion, provided a food item as a self-promotional item. This action constitutes a violation of IDAPA 18.01.56.014.01.

No later than thirty (30) days from the date the Final Order is adopted, the Title Agent shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future distributions of self-promotional items specifically do not include food, beverages, gift certificates, gift cards, or other items that have a specific monetary value on their face or that may be exchanged for any other item having a specific monetary value.

4. The Title Agent, on three (3) occasions, provided non-title services to a producer of title business without charging for and receiving a fee commensurate for services provided. These actions constitute a violation of IDAPA 18.01.56 Exhibit 1(7).

No later than thirty (30) days from the date the Final Order is adopted, the Title Agent shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future non-title services provided to a producer of title business are not provided without charging for and receiving a fee commensurate for services provided.

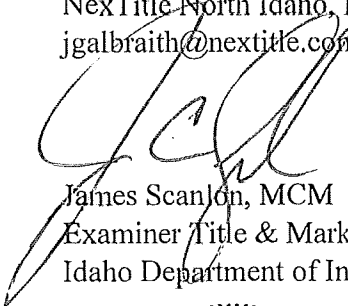
These actions should be considered violations and administrative penalties are appropriate pursuant to Idaho Code §§ 41-117 and IDAPA 18.01.56.018.01 & .03<sup>5</sup>. However, as this is the first examination completed on this Title Agent, administrative penalties will not be imposed at this time with the stipulation and understanding that the Department retains the right to impose new penalties based on any future findings of these same violations.

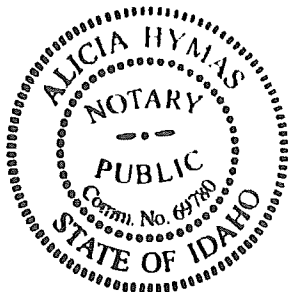
As these actions are troubling should they continue, the Department reserves the right to re-examine this Title Agent, pursuant to Idaho Code §§ 41-2710(7), prior to the next required examination in 2025. The examination period will not begin before (30) days after the date the Final Order for this examination is adopted.

Pursuant to Idaho Code § 41-2710(7), you have twenty-eight (28) days to review, comment and request a hearing regarding these findings. Unless a hearing is requested in accordance with Idaho Code §§ 41-227(5) and (6), 41-232(2)(b), or elsewhere in the Idaho Code within the twenty eight (28) day review period, the Director will issue an order adopting the report and it shall be deemed available to the public.

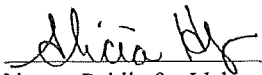
I certify that on this 4<sup>th</sup> day of November 2020, I submitted a final copy of this Report to the Director of the Idaho Department of Insurance and served a final copy of the same by Electronic Mail to:

James Galbraith  
General Counsel  
NexTitle North Idaho, LLC.  
jgalbraith@nextitle.com

  
James Scanlon, MCM  
Examiner Title & Market Insurance Specialist  
Idaho Department of Insurance



SUBSCRIBED AND SWORN to before me this 4<sup>th</sup> day of November, 2020.

  
Notary Public for Idaho  
Residing at: Ada  
Commission Expires: 4/19/2023

<sup>5</sup> IDAPA 18.01.56.018.01 & 03 were re-designated as IDAPA 18.05.01.031.07(a) & (c) effective March 20, 2020.