

FILED

AUG 30 2022

PW

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. 18-4149-22

**ORDER ADOPTING REPORT
OF EXCEPTION EXAMINATION
AS OF DECEMBER 31, 2021**

The Idaho Department of Insurance ("Department"), in accordance with Idaho Code §§ 41-2710(7) and 41-219(1) and (5), has examined the affairs, transactions, assets, tract indexes, abstract records, and other records of NexTitle North Idaho, LLC ("NexTitle") for the period of January 1, 2020, through December 31, 2021. The Department has also prepared a verified Report of Examination ("Report") per Idaho Code § 41-227. A copy of the Report is attached to this Order as Exhibit "A".

Having reviewed the Report and record, the Director enters this Order adopting the Report as filed, penalizing NexTitle in the total amount of \$354.24, and requiring NexTitle to revise its policies and procedures as noted below.

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. On or about August 11, 2022, the Department completed an exception examination of the practices and procedures of NexTitle under Idaho Code §§ 41-2710(7) and 41-219(1) and (5). The Report sets forth the Departments findings. *See* Exhibit "A", hereto.

3. Per Idaho Code § 41-227(4), on August 11, 2022, the Department's examiner-in-charge filed the Report with the Department, and the Department transmitted a copy of the Report to NexTitle on August 12, 2022.

4. Per Idaho Code § 41-2710(7), NexTitle had 28 days from the receipt of the Report to make a written submission or rebuttal with respect to matters in the Report.

5. On August 15, 2022, the Department received a Waiver from NexTitle signed by David E. Fennell, NexTitle's general legal counsel and authorized signatory. A copy of the Waiver is attached hereto as Exhibit "B." By executing the Waiver, NexTitle consented to the Director's immediate entry of a final order adopting the Report without modification. NexTitle also waived its rights to: (1) examine the Report for not more than 28 days; (2) make a written submission or rebuttal to the Report prior to entry of a final order; (3) request a hearing; and (4) seek reconsideration or appeal from the Director's final order.

CONCLUSIONS OF LAW

6. Idaho Code § 41-227(5) requires the Director to fully consider and review the Report, together with any written submissions or rebuttals and any relevant portions of the examiner's work papers and enter an order adopting the Report 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 and record, the Director concludes that, regarding the matters examined, the Report's comments, findings, and recommendations are appropriate and should be incorporated herein as if set forth in full.

ORDER

NOW, THEREFORE, IT IS ORDERED that the Report is adopted as filed.

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

74, Idaho Code.

IT IS FURTHER ORDERED, per Idaho Code § 41-227(6)(a), that within 30 days of the service date of this Order adopting the Report, NexTitle must file, with the Department's chief examiner, 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 NexTitle is penalized in the amount of \$225 for having violated IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01-Exhibit 1(4)(h)¹ in March, 2020, by providing a \$75.00 gift card to a producer of title business for their use in a promotional giveaway. Within 30 days of the service date of this Order, NexTitle must (1) pay this penalty to the Department and (2) revise its policies and procedures to ensure that any future self-promotional gift items comply with IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01- Exhibit 1(4)(h).

IT IS FURTHER ORDERED that NexTitle is additionally penalized in the amount of \$129.24 for having violated IDAPA 18.05.01.031.05 in May, 2021, by providing business entertainment to more than what the maximum number of allowed people. Within 30 days of the service date of this Order, NexTitle must (1) pay this additional penalty to the Department and (2) revise its policies and procedures to ensure that any future business entertainment expenses comply with IDAPA 18.05.01.031.05.

IT IS SO ORDERED.

DATED AND EFFECTIVE this 29th day of August, 2022.

STATE OF IDAHO
DEPARTMENT OF INSURANCE



DEAN L. CAMERON
Director

¹ Exhibit 1(4)(h) is an attachment to IDAPA 18.05.01 and is available on the Idaho Department of Insurance's website at: <https://doi.idaho.gov/wp-content/uploads/info/rules/18.05.01.pdf>

NOTIFICATION OF RIGHTS

This is a final order of the agency. Any party may file a motion for reconsideration of this final order within 14 days of the service date of this order. The agency will dispose of the motion for reconsideration within 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, 3rd 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 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 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 30th day of August, 2022, I caused a true and correct copy of the foregoing ORDER ADOPTING REPORT OF EXCEPTION EXAMINATION AS OF DECEMBER 31, 2021, to be served upon the following parties by the designated means:

<p>Randall Szabo Compliance Manager NEXTITLE NORTH IDAHO, LLC 608 Northwest Blvd., Suite 101 Coeur d'Alene, ID 83814</p> <p>David Fennell General Counsel NEXTITLE NORTH IDAHO, LLC</p>	<p><input type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Certified Mail (NexTitle only) <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: rszabo@nextitle.com dfennell@rrlgps.com</p>
<p>Karl T. Klein Deputy Attorney General IDAHO DEPARTMENT OF INSURANCE 700 W. State Street, 3rd Floor P.O. Box 83720 Boise, ID 83720-0043</p>	<p><input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: karl.klein@doi.idaho.gov</p>


Penny Wilcox



REPORT OF EXCEPTION EXAMINATION

For the Period January 1, 2020 to December 31, 2021

Of

NexTitle North Idaho, LLC.

(A title agent limited liability company - license #705061 – Kootenai County)

As of

December 31, 2021

Equal Opportunity Employer



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Boise, Idaho
August 3, 2022

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, Suite 101
Coeur d'Alene, Idaho 83814-2174
License #705061 – Kootenai County

Hereinafter referred to as “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. The examination was conducted remotely from the offices of the Idaho Department of Insurance (the "Department") located at 700 West State Street, 3rd 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. However, failure to identify or criticize specific practices, products, or files does not constitute approval thereof by the Department.

It should be recognized that the examination comments are restricted to areas of concern and are not intended as commentary on the various favorable aspects of the Agent's operations. It should be further understood that these comments should not be regarded as reflecting on the integrity or capabilities of individuals at the Agent. As such, this report may not fully reflect the procedures and practices of the Agent.

This examination report cites Idaho Statute and administrative rules promulgated by the Department. Statute and rule citations are current unless otherwise noted.

The final examination report documents consist of the examiners' report, the Agent's response, and any administrative actions based on the findings of the Department. 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 or was not possible.

PURPOSE AND SCOPE OF EXAMINATION

The purpose of this examination is to determine compliance with applicable Idaho Statutes, 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 1, 2020 through December 31, 2021. Specific areas examined include operations/management, claims, advertising and marketing, title file review and escrow fiduciary account and file review.

The authority of the Department to perform this examination includes, but is not limited to, Idaho Code § 41-2710(7), which grants authority to the Department to regular examinations 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 said title or the rules thereunder.

EXECUTIVE SUMMARY

The examination noted exceptions in the area of Advertising and Marketing (pages 7-9). The following two (2) exceptions were noted:

- **One (1) Exception**
IDAPA 18.05.01.031.04(a) – Self-Promotional Advertising
IDAPA 18.05.01 - Exhibit 1(4)(h)

The Agent provided a \$75.00 gift card to a producer of title business for their use in a promotional giveaway gift basket.

- **One (1) Exception**
IDAPA 18.05.01.031.05 – Permitted Business Entertainment

The Agent provided business entertainment for six (6) persons who are employed by or agents of a single producer of title business.

HISTORY AND DESCRIPTION

On June 1, 2018, NexTitle North Idaho, LLC., filed as a limited liability company with the Idaho Secretary of State. They were licensed with the Department and began operations in Kootenai County on January 4, 2019. They conduct business in Kootenai County out of offices in Coeur D'Alene, Idaho.

PRIOR EXAMINATION

Our examination included a review to determine if the fifteen (15) exceptions noted in the November 4, 2020 examination, which covered the period of January 4, 2019 to December 31, 2019 were addressed. We determined that the Agent satisfactorily addressed these exceptions in December of 2020.

EXAMINATION 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 18.05.01.014 & 015**

As of August 20, 2021, the Idaho Secretary of State lists Corporation Service Company as the current Registered Agent. As of May 3, 2021, the Idaho Secretary of State list Nextitle Holdings as the LLC Manager and Member. The Agent has a 42.8% investor interest by entities and individuals licensed by the Idaho Real Estate Commission. No exceptions were noted as a result of this portion of the examination.

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

The Agent has underwriting contracts with Old Republic National Title Insurance Company, Stewart Title Guaranty Company and Westcor Land Title Insurance Company. The underwriting contracts high liability approval requirements range from \$1,000,000.00 to \$3,000,000.00 with a \$5,000.00 deductible for loss. No exceptions were noted as a result of this portion of the examination.

C. SURETY BOND **Idaho Code §§ 41-2710(6), 2711** **IDAPA 18.05.01.021.07 & 08**

The Department 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 five (5) claims during the examination period. The claims appear to be purported missed easements and/or oversights by employees of the Agent. There does not appear to be any problem 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 18.05.01.031 & Exhibit 1

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, 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. A total of two (2) exceptions were noted as a result of this portion of the examination.

- **One (1) Exception**
IDAPA 18.05.01.031.04(a) – Self-Promotional Advertising
IDAPA 18.05.01 - Exhibit 1(4)(h)

During the examination the following exception regarding a gift card was noted:

Date of Gift Card Expense	Violation of IDAPA 18.05.01.031.04(a) & 18.05.01 - Exhibit 1(4)(h)
March 2020	The Agent provided a \$75.00 gift card to Idaho Central Credit Union, a producer of title business, for their use in a promotional giveaway gift basket.

IDAPA 18.05.01.031.04(a) states: *“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. Self-promotional items will not contain the name, logo or any reference to a producer of title business, trade association or donee.”*

IDAPA 18.05.01 Exhibit 1(4)(h) states: *“A title entity will not pay or offer to pay, either directly or indirectly, with respect to any producer of title business for: Money, prizes, or other items of value in any kind of a contest or promotional endeavor.”*

The Agent was in violation of IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01 - Exhibit 1(4)(h) for providing a \$75.00 gift card to a producer of title business for their use in a promotional giveaway gift basket.

Recommendations: It is recommended the Agent revise its procedures to ensure self-promotional gift items are compliant with IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01 - Exhibit 1(4)(h).

Furthermore, the November 4, 2020 prior examination noted Advertising and Marketing exceptions without an administrative penalty; therefore, it is also recommended that the Director enter an order for administrative penalty as a result of violating IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01 - Exhibit 1(4)(h), in the amount of two hundred twenty-five dollars (\$225.00).

- **One (1) Exception**
IDAPA 18.05.01.031.05 – Permitted Business Entertainment

During the examination the following exception regarding business entertainment was noted:

Date of Business Entertainment	Violation of IDAPA 18.05.01.031.05
May 2021	Staff member Kristy Casley expended \$129.24 for business entertainment on six (6) persons who are employed by or agents of a single producer of title business.

IDAPA 18.05.01.031.05 states in relevant part: *“A title entity will not expend more than one hundred dollars (\$100) per person per day for all meals and/or events. Meals and events will include, but not be limited to, breakfast, brunch, lunch, dinner, cocktails, sporting events, sporting activities, trips and music and art events. These meals or events may occur on or off the title entity's premises. In addition, a title entity may entertain no more than four (4) persons who are employed by or agents of any single producer of title business in a single day. Spouses and/or guests of the producers of title business or employees or agents are included in the count for purposes of determining the four (4) person maximum...”*

The Agent was in violation of IDAPA 18.05.01.031.05 for providing business entertainment on six (6) persons who are employed by or agents of a single producer of title business.

Recommendations: It is recommended the Agent revise its procedures to ensure business entertainment matters are compliant with IDAPA 18.05.01.031.05.

Furthermore, the November 4, 2020 prior examination noted Advertising and Marketing exceptions without an administrative penalty; therefore, it is also recommended that the Director enter an order for administrative penalty as a result of violating IDAPA 18.05.01.031.05, in the amount of one hundred twenty-nine dollars and twenty-four cents (\$129.24).

III. TITLE FILE REVIEW

Idaho Code §§ 41-2702, 2708 & 2709

IDAPA 18.05.01.012, 013 & Exhibit 1(9)

The title department is managed by Janaya Carter and is comprised of two (2) Title Officers and one (1) Title Assistant. Title plant ownership, maintenance, and posting are set forth in an automatically extendable lease agreement between Northwest Title, LLC, and the Agent. 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, and unique kind or class of risk. No exceptions were noted as a result of this portion of the examination.

IV. ESCROW FIDUCIARY ACCOUNTS AND FILE REVIEW

The escrow department is managed by Kristy Anstine and is comprised of three (3) Escrow Officers and three (3) Escrow Assistants.

A. FIDUCIARY ACCOUNTS

IDAPA 18.05.01.021.04, 05 & 09

The 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 fiduciary accounts are balanced on a daily basis and reconciled on a monthly basis by Stacy Blackman, Compliance Officer at the Agent's corporate office. Monthly reconciliations are reviewed by Jace Perry, CFO. No exceptions were noted as a result of this portion of the examination.

B. ESCROW FILE REVIEW

Idaho Code § 41-2705(3)

IDAPA 18.05.01.021 & 022

The examination included a review of the escrow files opened during the examination period. 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 the escrow officers. No exceptions were noted as a result of this portion of the examination.

SUMMARY OF RECOMMENDATIONS

The recommendations made below identify corrective measures the Department finds necessary as a result of the exceptions noted in this Report of Exception Examination ("Report"). Location in the Report is referenced in parenthesis.

1. (Section II. Advertising and Marketing, pages 7-9)

It is recommended the Agent revise its procedures to ensure self-promotional gift items are compliant with IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01 - Exhibit 1(4)(h).

It is also recommended that the Director enter an order for administrative penalty as a result of violating IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01 - Exhibit 1(4)(h), in the amount of two hundred twenty-five dollars (\$225.00).

2. (Section II. Advertising and Marketing, pages 7-9)

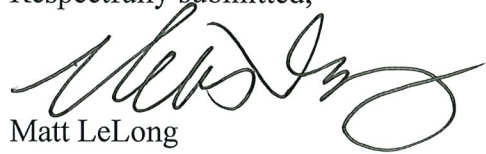
It is recommended the Agent revise its procedures to ensure business entertainment matters are compliant with IDAPA 18.05.01.031.05.

It is also recommended that the Director enter an order for administrative penalty as a result of violating IDAPA 18.05.01.031.05, in the amount of one hundred twenty-nine dollars and twenty-four cents (\$129.24).

AFFIDAVIT OF EXAMINER

I certify and attest that I have examined the Agent's tract indexes, abstract records, as well as other records, and the operation of the Agent's business and other matters relevant to the affairs of the Agent. I further certify that I have no relationship, other than in my capacity as examiner and/or regulator, with the 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 Agent and its 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,



Matt LeLong

Market Examiner and Title Insurance Specialist

Idaho Department of Insurance

SUBSCRIBED AND SWORN to before me this 11th day of August, 2022.




Notary Public for Idaho

Residing at: Ceda County

Commission Expires: 07/02/2027

PENALTY, STIPULATIONS AND APPEAL NOTIFICATION

This matter comes before the 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 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 Agent, on one (1) occasion, provided a seventy-five-dollar (\$75.00) gift card to a producer of title business for their use in a promotional giveaway gift basket. This action constitutes a violation of IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01 - Exhibit 1(4)(h).

The Department shall assess a penalty in the amount of two hundred twenty-five dollars (\$225.00) for violation of IDAPA 18.05.01.031.04(a) and IDAPA 18.05.01 - Exhibit 1(4)(h). No later than thirty (30) days from the date the Final Order is adopted, the Agent shall remit penalty payment of two hundred twenty-five dollars (\$225.00) to the Department.

2. The Agent, on one (1) occasion, provided business entertainment for six (6) persons who are employed by or agents of a single producer of title business. This action constitutes a violation of IDAPA 18.05.01.031.05.

The Department shall assess a penalty in the amount of one hundred twenty-nine dollars and twenty-four cents (\$129.24) for violation of IDAPA 18.05.01.031.05. No later than thirty (30) days from the date the Final Order is adopted, the Agent shall remit penalty payment of one hundred twenty-nine dollars and twenty-four cents (\$129.24) to the Department.

These actions are considered violations and administrative penalties are appropriate pursuant to Idaho Code §§ 41-2708(3), 41-117, IDAPA 18.05.01.031.04(a), IDAPA 18.05.01 - Exhibit 1(4)(h), and IDAPA 18.05.01.031.05.

State of Idaho
DEPARTMENT OF INSURANCE

BRAD LITTLE
Governor

700 West State Street, 3rd Floor
P.O. Box 83720
Boise, Idaho 83720-0043
Phone 208-334-4250
Fax 208-334-4398
Website: <https://doi.idaho.gov>

DEAN L. CAMERON
Director

WAIVER

In the matter of the Report of Exception Examination as of December 31, 2021, of:

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

By executing this Waiver, the Agent hereby acknowledges receipt of the above-described examination report, verified as of the 11th day of August 2022, and by this Waiver hereby consents to the immediate entry of a final order by the Director of the Department of Insurance adopting said report without any modifications.

By executing this Waiver, the Company also hereby waives:


1. its right to examine the report for up to twenty-eight (28) days as provided in Idaho Code section 41-2710(7),
2. its right to make additional written submissions or rebuttals to the report prior to entry of a final order as provided in Idaho Code section 41-2710(7) and,
3. any right to request a hearing under Idaho Code sections 41-227(5) and (6), 41-232(2)(b), or elsewhere in the Idaho Code, and
4. any right to seek reconsideration and appeal from the Director's order adopting the report as provided by section 41-227(6), Idaho Code, or elsewhere in the Idaho Code.

Dated this 15th day of August, 2022

NexTitle North Idaho, LLC.

David E. Fennell

Name (print)



Name (signature)

Authorized Signatory

Title

