

FILED

MAY 25 2023

**Department of Insurance
State of Idaho**

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

In the Matter of:

BLAINE COUNTY TITLE, INC.

License No. 477261

Docket No. 18-4291-23

**ORDER ADOPTING REPORT
OF EXCEPTION EXAMINATION
AS OF DECEMBER 31, 2022**

The Idaho Department of Insurance (“Department”), in accordance with Idaho Code §§ 41-219(1) and (5) and 41-2710(7), has examined the affairs, transactions, assets, tract indexes, abstract records, and other records of Blaine County Title, Inc. (“Blaine County Title”) for the period of January 1, 2018, through December 31, 2022. The Department’s verified Report of Examination (“Report”), reflecting the examiner’s findings, was then filed with the Department per Idaho Code § 41-227.

Having reviewed the Report and record, the Director enters this Order adopting the Report as filed. A copy of the Report is attached to this Order as Exhibit “A”.

FINDINGS OF FACT

1. Blaine County Title is a title agency licensed by the Department to transact title insurance in Blaine County, Idaho, under License No. 477261.

2. On or about May 4, 2023, the Department completed an examination of Blaine County Title’s practices and procedures, per Idaho Code §§ 41-2710(7) and 41-219(1) and (5), to determine whether they complied with title 41, Idaho Code, and any related rules. The examiner’s findings are documented in the Report. In summary, the examiner found that Blaine County Title violated the

Department's rules as follows:

- In August 2019, Blaine County Title violated IDAPA 18.05.03.011¹ on one occasion by purchasing and distributing three (3) gift cards and providing them to individual consumers as gifts to make an apology for unintentional errors.
and

In August 2021, Blaine County Title violated IDAPA 18.05.01.022 by charging and collecting an escrow fee less than the fees filed with the Department.

3. Based on these findings, the examiner recommended that Blaine County Title:

- Be assessed an administrative penalty of \$900.00 for having violated IDAPA 18.05.03.011; provided, however, that such penalty is deferred subject to the understanding that the Department retains the right to enforce the deferred penalty of \$900.00 and impose additional penalties should there be a finding of future violations of these rules;
- Revise its procedures to ensure future items of value and escrow fees are compliant with IDAPA 18.05.01.031 and IDAPA 18.05.01.022.

4. Per Idaho Code § 41-227(4), the Department's examiner-in-charge filed the Report with the Department on May 4, 2023, and transmitted a copy to Blaine County Title on May 10, 2023.

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

6. On May 10, 2023, the Department received a Waiver from Blaine County Title signed by Daryl Fauth, Blaine County Title's President, County Manager and authorized signatory. A copy of the Waiver is attached hereto as Exhibit "B". By executing the Waiver, Blaine County Title

¹ In August 2019, when this violation occurred, IDAPA 18.05.03.11 (6-30-19)T a temporary rule was applicable, this rule was consolidated and re-designated as IDAPA 18.05.01.031.01, effective March 20, 2020.

consented to the Director's immediate entry of a final order adopting the Report without modification. Blaine County Title 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

7. 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.

8. Blaine County Title's actions are considered violations and administrative penalties are appropriate per Idaho Code §§ 41-2708(3), 41-117, 41-2710(7), IDAPA 18.05.03.11, and IDAPA 18.05.01.022. As noted above, while the company violated IDAPA 18.05.03.11, and imposing a penalty for that violation would be appropriate, such penalty is deferred subject to the understanding that the Department retains the right to enforce the deferred penalty of \$900.00 and impose additional penalties should there be a finding of future violations of these rules;

9. 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:

1. The Report is adopted as filed;
2. Per Idaho Code §§ 41-227(5)(a); 41-227(8) and 41-2710(7), the adopted Report is a public record and shall not be subject to the exemptions from disclosure in chapter 1, title 74, Idaho Code;

3. Per Idaho Code § 41-227(6)(a), within 30 days of the service date of this Order, Blaine County Title 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.

4. Within 30 days of the service date of this Order, Blaine County Title must submit to the Department, in writing, what proposed procedures will be implemented to ensure future items of value and escrow fees are compliant with IDAPA 18.05.01.03 and IDAPA 18.05.01.22.

DATED AND EFFECTIVE this 25th day of May, 2023.

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 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:

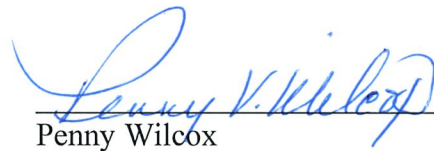
- i. A hearing was held;
- ii. The final agency action was taken;
- iii. The party seeking review of the order resides, or operates its principal place of business in Idaho; or
- iv. The real property or personal property that was the subject of the agency action is located.

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 25th day of May, 2023, I caused a true and correct copy of the foregoing ORDER ADOPTING REPORT OF EXCEPTION EXAMINATION AS OF DECEMBER 31, 2022, to be served upon the following parties by the designated means:

BLAINE COUNTY TITLE, Inc. Daryl Fauth, President 360 E. Sun Valley Road Ketchum, ID 83340	<input type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <u>daryl@blainecountytitle.com</u>
John Keenan Deputy Attorney General IDAHO DEPARTMENT OF INSURANCE 700 W. State Street, 3 rd Floor P.O. Box 83720 Boise, ID 83720-0043	<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: <u>john.keenan@doi.idaho.gov</u>



Penny Wilcox



REPORT OF EXCEPTION EXAMINATION

For the Period January 1, 2018 through December 31, 2022

Of

BLAINE COUNTY TITLE, INC.

(a title agent corporation - license #477261 – Blaine County)

As of

December 31, 2022

Equal Opportunity Employer

EXHIBIT

A

exhibitsticker.com

Table of Contents

SALUTATION.....	3
FOREWORD.....	4
PURPOSE AND SCOPE OF EXAMINATION.....	5
EXECUTIVE SUMMARY	5
HISTORY AND DESCRIPTION.....	6
PRIOR EXAMINATION.....	6
EXAMINATION FINDINGS AND RECOMMENDATIONS	6
I. OPERATIONS AND MANAGEMENT	6
A. MANAGEMENT, CONTROL AND FINANCIAL INTERESTS.....	6
B. CONTRACTING AUTHORITY.....	6
C. SURETY BOND.....	7
D. CLAIMS.....	7
II. ADVERTISING AND MARKETING	7
III. TITLE FILE REVIEW	8
IV. ESCROW FIDUCIARY ACCOUNTS AND FILE REVIEW	8
A. FIDUCIARY ACCOUNTS	8
B. ESCROW FILE REVIEW	9
SUMMARY OF RECOMMENDATIONS.....	10
AFFIDAVIT OF EXAMINER.....	11
PENALTY, STIPULATIONS AND APPEAL NOTIFICATION	12

Boise, Idaho
May 3, 2023

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;

Blaine County Title, Inc.
360 E. Sun Valley Road
Ketchum, Idaho 83340-3121
License #477261 – Blaine 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 Blaine County Title, Inc., an Idaho Title Agent licensed in Blaine 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. In addition, the examiner(s) may have documented practices and procedures that did not appear to be in the best interest of Idaho insurance consumers. However, failure to identify or criticize specific practices, products, or files does not constitute approval thereof by the Department.

It should be understood that 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 recognized that these comments should not be regarded as reflecting 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.

The period covered by this examination is January 1, 2018 through December 31, 2022. 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 found the following areas of concern:

- **1 Exception**

IDAPA 18.05.03.011¹ – Prohibited Things of Value

A title entity shall not provide things of value to a producer of title business, consumer or member of the general public except as permitted . . . If a providing of things of value does not clearly fit into the rules . . . then it is a prohibited act. . . .

The Agent purchased and distributed three (3) \$100.00 gift cards, a prohibited thing of value, for three (3) consumers as gifts to apologize for unintentional errors.

The above exception is noted herein Section II. Advertising and Marketing, pages 7-8.

- **1 Exception**

IDAPA 18.05.01.022 – Escrow Fees

Title insurers and title insurance agents will not charge less than the fees filed with the Department of Insurance for a specified escrow service . . .

The Agent charged and collected an escrow fee of \$407.50, which is less than the \$500.00 minimum fee as filed with the Department of Insurance.

The above exception is noted herein Section IV.B. Escrow File Review, page 9.

¹ On August 28, 2019, when this violation occurred, IDAPA 18.05.03.011 (6-30-19)T a temporary rule was applicable, this rule was consolidated and re-designated as IDAPA 18.05.01.031.01, effective March 20, 2020.

HISTORY AND DESCRIPTION

Blaine County Title, Inc., was formed and incorporated with the Idaho Secretary of State on November 19, 1981. On May 4, 1984, Blaine County Title Associates, a subsidiary, was licensed with the Idaho Department of Insurance as a Title Agent in Blaine County. On February 19, 2014, Blaine County Title Associates changed their name to its parent and current name, Blaine County Title, Inc., and were issued a new license number by the Idaho Department of Insurance. They conduct business in Blaine County out of offices in Ketchum and Hailey, Idaho.

PRIOR EXAMINATION

Our examination included a review to determine if the one (1) exception noted in the preceding report of exception examination dated April 5, 2017, which covered the period of January 1, 2013 through December 31, 2017 were addressed. We determined that the Agent satisfactorily addressed this exception.

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 October 3, 2022, the Idaho Secretary of State shows Daryl Fauth as Registered Agent and President, Kathy Seal as Vice President, and Gary Oyen as Secretary. As of October 1, 2019, the Idaho Secretary of State shows the Directors as Michael Donovan, William Rutter, Roger Crist, Jack Bariteau, Erik Doyle, SpeyBro LLC, Zach Crist, Danielle Carruth, and Roger W. Crist. The stockholders are listed as Gary Oyen, William Rutter, Daryl Fauth, Michael Donovan, Reggie Crist, Danielle Carruth, Zach Crist, Kathy Seal, SpeyBro LLC, Dove Spangler, Doyle Family Trust, and Jack Bariteau. Daryl Fauth is President and County Manager at the Agent. 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 Stewart Title Guaranty Company (STGC) and Old Republic National Title Insurance Company (ORNT). The underwriting contract with STGC

requires high liability approval for risks in excess of \$5,000,000.00 with a \$5,000.00 deductible for loss. The underwriting contract with ORNT requires high liability approval for risks in excess of \$1,000,000.00 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 #70573632 in the amount of \$50,000.00 issued by Western Surety Company 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 one (1) claim was filed within the examination period. The claim appears to be a purported missed easement and/or an oversight on the part of employees of the Agent. There does not appear to be any material problems with 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.

- The following exception was noted as a result of this portion of the examination:

Date of Expense	Violation of IDAPA 18.05.03.011²
August 28, 2019	On one (1) occasion, the Agent purchased three (3) \$100.00 gift cards, a total expenditure of \$300.00, and provided them to three (3) individual consumers as gifts to apologize for unintentional errors.

² On August 28, 2019, when this violation occurred, IDAPA 18.05.03.011 (6-30-19)T a temporary rule was applicable, this rule was consolidated and re-designated as IDAPA 18.05.01.031.01, effective March 20, 2020.

IDAPA 18.05.03.011 states in relevant part: *“Prohibited Things of Value. A title entity shall not provide things of value to a producer of title business, consumer or member of the general public except as permitted in Sections 012, 013, 014, and 015 of this chapter. If a providing of things of value does not clearly fit into the rules in Sections 012, 013, 014, and 015, then it is a prohibited act.”*

The Agent was in violation of IDAPA 18.05.03.011 for providing prohibited things of value, three (3) \$100.00 gift cards to consumers as a gift of apology.

Recommendations: It is recommended the Agent submit to the Department in writing what proposed procedures will be implemented to ensure future items of value are compliant with IDAPA 18.05.01.031.

Furthermore, it is recommended that the Director enter an order for administrative penalty as a result of violating IDAPA 18.05.03.011 in the amount of \$900.00; however, as this is the first instance of this violation, it is also recommended that the Director waive this penalty with the stipulation and understanding that the Department retains the right to impose new penalties based on any future findings of this same violation.

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 both Terry Washburn and Daryl Fauth and is comprised of two (2) Title Officers. The title plant is posted and maintained by the Agent in Ketchum, Idaho. 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 both Kathy Seal and Daryl Fauth and is comprised of two (2) Escrow Officers and one (1) Escrow Assistant.

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 by Daryl Fauth and reconciled on a monthly basis by Stewart Financial Services. The monthly

reconciliations reports are reviewed by Daryl Fauth, the President and County Manager at the Agent. 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.

- The following exception was noted as a result of this portion of the examination:

Violation of IDAPA 18.05.01.022			
Closing Date	File Number	Escrow Fee Charged	Rate Filed with the Department
August 30, 2021	2123989	\$407.50	\$500.00

Idaho Code § 41-2705(3) states: *“The escrow fees of title insurers and title insurance agents shall be filed in accordance with rules promulgated by the director of the department of insurance.”*

IDAPA 18.05.01.022 states in relevant part: *“Escrow Fees. Title insurers and title insurance agents will not charge less than the fees filed with the Department of Insurance for a specified escrow service, as such service is defined in the title insurer's or title insurance agent's filed schedule of fees.”*

The Agent was in violation of IDAPA 18.05.01.022 for charging and collecting an escrow fee less than the fees as filed with the Department of Insurance.

Recommendations: It is recommended the Agent submit to the Department in writing what proposed procedures will be implemented to ensure future escrow fees are compliant with IDAPA 18.05.01.022.

Furthermore, this violation appears to be a miscalculation rather than an inducement; therefore, no administrative penalty is recommended at this time.

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 7-8)

It is recommended the Agent submit to the Department in writing what proposed procedures will be implemented to ensure future items of value are compliant with IDAPA 18.05.01.031.

Furthermore, it is recommended that the Director enter an order for administrative penalty as a result of violating IDAPA 18.05.03.011³ in the amount of \$900.00; however, as this is the first instance of this violation, it is also recommended that the Director waive this penalty with the stipulation and understanding that the Department retains the right to impose new penalties based on any future findings of this same violation.

2) (Section IV.B. Escrow File Review, page 9)

It is recommended the Agent submit to the Department in writing what proposed procedures will be implemented to ensure future escrow fees are compliant with IDAPA 18.05.01.022.

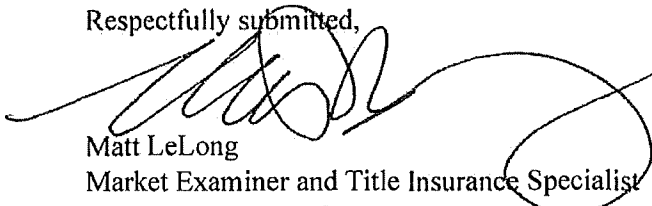
Furthermore, this violation appears to be a miscalculation rather than an inducement; therefore, no administrative penalty is recommended at this time.

³ Ibid., pp. 5, 7.

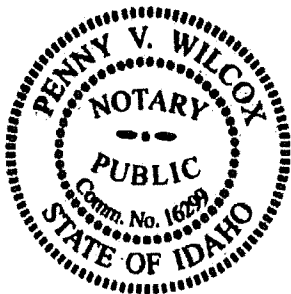
AFFIDAVIT OF EXAMINER

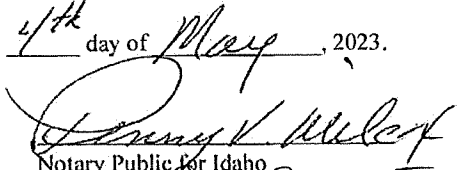
I certify and attest that I have examined the Agent's tract indexes, abstract records, as well as other records, and the operation of the Agent's business and other matters relevant to the affairs of the Agent. I further certify that I have no relationship, other than in my capacity as examiner and/or 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 4th day of May, 2023.




Notary Public for Idaho

Residing at:

Commission Expires:

Ada County
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, purchased and distributed three (3) \$100.00 gift cards for three (3) consumers as gifts, a total expenditure of \$300.00, to apologize for unintentional errors. This action constitutes a violation of IDAPA 18.05.03.011⁴.

No later than thirty (30) days from the date the Final Order is adopted the Agent is required to submit to the Department in writing what proposed procedures will be implemented to ensure future items of value are compliant with IDAPA 18.05.01.031.

The Department shall assess a penalty in the amount of nine hundred dollars (\$900.00) for violation of IDAPA 18.05.03.011. However, the Department waives this penalty with the stipulation and understanding that the Department retains the right to impose new penalties based on any further findings of this same violation.

2. The Agent, on one (1) occasion, charged and collected an escrow fee that was less than the minimum escrow fee as filed with the Department. This action constitutes a violation of IDAPA 18.05.01.022.

No later than thirty (30) days from the date the Final Order is adopted the Agent is required to submit to the Department in writing what proposed procedures will be implemented to ensure future escrow fees are compliant with IDAPA 18.05.01.022.

These actions are considered violations and administrative penalties are appropriate pursuant to Idaho Code §§ 41-2708(3), 41-117, IDAPA 18.05.03.011 and IDAPA 18.05.01.022.

⁴ Ibid., pp. 5, 7.

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, 2022, of:

**Blaine County Title, Inc.
360 E. Sun Valley Road
Ketchum, Idaho 83340-3121
License #477261 – Blaine County**

By executing this Waiver, the Agent hereby acknowledges receipt of the above-described examination report, verified as of the 4th day of May 2023, 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 10th day of May, 2023

Blaine County Title, Inc.

[Signature]

Name (print)

[Signature]

Name (signature)

President

Title

EXHIBIT

B