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Department of Insurance
State of Idaho

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

In the Matter of:

NORTH IDAHO TITLE INSURANCE, INC
[Kootenai County]

License No. 31783

Docket No. 18-4504-24

**ORDER ADOPTING REPORT
OF EXCEPTION EXAMINATION
AS OF DECEMBER 31, 2023**

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 NORTH IDAHO TITLE INSURANCE, INC (“North Idaho Title”) 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 of North Idaho Title for the Period of January 1, 2019 to December 31, 2023 (“Report”), as filed.

FINDINGS OF FACT

1. North Idaho Title is a title agency licensed by the Department to transact title insurance in Kootenai County, Idaho, under Title Agency License No. 31783.
2. The Department completed an examination of North Idaho Title pursuant to Idaho Code §§ 41-2710(7) and 41-219(1) and (5) on or about October 2, 2024. The Department’s findings are set forth in the Report. In summary, the examiner found that North Idaho Title violated the Department’s rules as follows:

- a. From January 1, 2019, through December 31, 2023, North Idaho Title

violated IDAPA 18.05.01.031.01 and 18.05.01.031.04(a) on one (1) occasion by purchasing and distributing \$332.26 in self-promotional items to producers of title business.

b. From January 1, 2019, through December 31, 2023, North Idaho Title violated IDAPA 18.05.01.031.01, IDAPA 18.05.01.031.04(a), and Exhibit 1 to IDAPA 18.05.01, on one (1) occasion by providing an item of value, specifically a \$125.00 financial sponsorship to The Easy Home Buyer, LLC, a producer of title business.

c. Based on these findings, the examiner recommended North Idaho Title revise its procedures to ensure future self-promotional items comply with the Department's rules

3. Pursuant to Idaho Code § 41-227(4), a copy of the Report was filed with the Department on October 17, 2024, and was transmitted to North Idaho Title on the same date. A copy of the Report is attached hereto as Exhibit A.

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

5. On October 28, 2024, the Department received a Waiver from North Idaho Title, signed by Darrell Martin, its Executive Vice President and Secretary. By execution of such Waiver, a copy of which is attached hereto as Exhibit B, North Idaho Title consented to the immediate entry of a final order by the Director of the Department ("Director") adopting the Report without any modifications; waived its right to make a written submission or rebuttal to the Report; and waived its right to request a hearing and to seek reconsideration or appeal for the Director's final order.

CONCLUSIONS OF LAW

6. Idaho Code § 41-227(5)(a) provides that, after expiration of "the period allowed

for the receipt of written submissions or rebuttals, the Director 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.

7. North Idaho Title's actions are considered violations, and administrative penalties are appropriate per Idaho Code §§ 41-2708(3), 41-117, and IDAPA 41-1016. However, administrative penalties will not be imposed at this time with the stipulation that the Department retains the right to impose new penalties should there be a finding of future violations of these rules.

8. 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, based on the foregoing, IT IS HEREBY ORDERED that the Report of Exception Examination of North Idaho Title [Kootenai County] for the period of January 1, 2019, to December 31, 2023, is hereby ADOPTED as filed, pursuant to Idaho Code § 41-227(5)(a).

IT IS FURTHER ORDERED, pursuant to §§ 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 service date of this Order, North Idaho Title must file, with the Department's Market Examiner & Title 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 within 30 days of the service date of this Order, North Idaho Title will: (a) submit to the Department in writing proposed revisions of its policies and procedures to ensure that any future self-promotional items comply with IDAPA 18.05.01.031.01, IDAPA 18.05.01.031.04(a), and Exhibit 1 to IDAPA 18.05.01.

IT IS SO ORDERED.

DATED this 13 day of November, 2024.

STATE OF IDAHO
DEPARTMENT OF INSURANCE



DEAN L. CAMERON
Director

NOTIFICATION OF RIGHTS


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

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order may appeal it by filing a petition for judicial review in the district court of the county in which: (1) the hearing was held; or (2) the final agency action was taken; or (3) the aggrieved party resides or operates its principal place of business in Idaho; or (4) the real property or personal property that was subject of the agency decision is located. An appeal must be filed within twenty-eight (28) days of: (a) the service date of this final order; or (b) an order denying a petition for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a petition 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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 13th day of November, 2024, I caused a true and correct copy of the foregoing ORDER ADOPTING REPORT OF EXCEPTION EXAMINATION AS OF DECEMBER 31, 2023, to be served upon the following by the designated means:

| | |
|--|---|
| Darrell Martin Executive Vice President and Secretary North Idaho Title Insurance, Inc 601 E Front Avenue, Suite #204 Coeur d'Alene, ID 83814-5169 | <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: dmartin@mlhc.com |
| Natalie Ellison, Regulatory Compliance Manager Rick Brown, Regional Vice President Gavin Jacobson, Senior Vice President | <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: nellison@mlhc.com rickb@northidahotitle.com gavinj@northidahotitle.com |
| Matt Steen 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: matt.steen@doi.idaho.gov |



Jan Noriyuki
Paralegal



REPORT OF EXCEPTION EXAMINATION
For the Period January 1, 2019 through December 31, 2023

Of
NORTH IDAHO TITLE INSURANCE, INC.
(a title agent corporation - license #31783 – Kootenai County)

As of
December 31, 2023

Equal Opportunity Employer

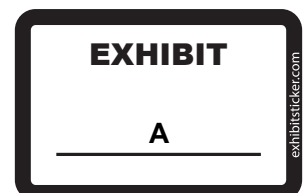


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Boise, Idaho
October 2, 2024

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, 41-2710(7) and 41-2713, an examination has been made of the administrative affairs, books, records, and financial condition of;

North Idaho Title Insurance, Inc.
601 E. Front Avenue, Suite #204
Coeur d'Alene, Idaho 83814-5169
License #31783 – 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 North Idaho Title Insurance, Inc., 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, 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, examiners 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 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 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 examiner’s report, the Agent’s response, if any, 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, 2019 through December 31, 2023. 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 identified a total two (2) exceptions. The examined area, along with the noted exceptions, violations, and pertinent citations, are summarized below with relevant emphasis added:

1) Advertising and Marketing (Section II., pages 8-9.)

- **Two (2) Exceptions:**

- **IDAPA 18.05.01.031.01 – Items of Value.**

- A title entity will not provide items 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 not allowed . . .***

- **IDAPA 18.05.01.031.04(a) – Self-Promotional Advertising.**

- A title entity may distribute self-promotional items having an acquisition value of less than twenty-five dollars (\$25) . . . 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 . . .***

- **Exhibit 1 – Attachment to Idaho Rule 18.05.01, Subsection 1 and 2.**

- 1.** A title entity **will not sponsor** any activity off its premises unless the producer of title business bears the entire cost of the activity. A title entity will not cosponsor, subsidize, contribute fees, prizes, gifts, or otherwise provide items of value for a promotional function off the title entity's premises regardless whether the function is self-promotional or not . . . **2.** A title entity **will not sponsor**, subsidize, supply prizes or labor, or otherwise provide items of value for promotional activities of producers of title business . . .*

Violation: The Agent, on two (2) separate occasions provided items of value that are not allowed. Specifically, on one (1) occasion, the Agent provided items explicitly not allowed, including food, beverage, and gift cards to producers of title business. Additionally, on another occasion, the Agent provided a financial sponsorship to a producer of title business for an event they hosted. These actions constitute violations of IDAPA 18.05.01.031.01, 18.05.01.031.04(a), and Exhibit 1(1)(2).

HISTORY AND DESCRIPTION

North Idaho Title Insurance, Inc., filed its articles of incorporation with the State of Idaho, and on April 15, 1993, the Idaho Secretary of State granted its approval and issued their Certificate of Incorporation. North Idaho Title Insurance, Inc., was initially licensed as a title agent in Kootenai County by the Idaho Department of Insurance on June 1, 1993. They expanded their title agent operations with the addition of licenses in both Bonner and Teton County, January 12, 2005 and October 31, 2006, respectively. The corporation and its operations are currently a wholly owned subsidiary of Mother Lode Holding Company, its parent, who is also parent to title related operations in 8 other states. 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 one (1) exception noted in the preceding report of exception examination, dated June 12, 2019, which covered the period of January 1, 2015 through December 31, 2018, was addressed. We determined that the Agent did satisfactorily address this exception in June of 2019.

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 April 3, 2024, the Idaho Secretary of State shows the Agent as active-good standing, with Rick Brown as its President and Registered Agent, Darrell Martin as Secretary and David Philipp as Treasurer. The Directors are listed as Darrell Martin, David Philipp, Lisa Steele, Randall E. Bradley, and its Vice Presidents as Gavin Jacobson, Gerald Chalmers, John Tyler, Matthew Feivish Wajner, James Vernon Boxdell II, and William Aulber. 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 American Guaranty Title Insurance Company (“AGTIC”), DOMA, First American Title Insurance Company (“FATIC”), Old Republic National Title Insurance Company (“ORNTIC”), Stewart Title Guaranty Company (“STGC”), and Westcor Land Title Insurance Company (“WLTIC”).

The underwriting contracts are subject to high liability limits, without underwriter approval, and deductible for loss, as follows:

| Underwriter | High Liability Limit Without UW Approval | Deductible for Loss |
|--------------------|---|--|
| AGTIC | \$1,500,000.00 (as of 10/13/2021) | \$5,000.00 |
| DOMA | \$1,000,000.00 (as of 05/14/2014) | The first \$2,500.00, and 70% of the next \$12,500.00, with a maximum liability of \$11,250.00 |
| FATIC | \$15,000,000.00 (as of 07/01/2022) | No deductible |
| ORNTIC | \$3,000,000.00 (as of 11/16/2021) | \$5,000.00 |
| STGC | \$3,000,000.00 (as of 06/17/2022) | \$15,000.00 |
| WLTIC | \$5,000,000.00 (as of 9/20/2007) | \$5,000.00 |

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

The Department has on file surety bond #9420101 in the amount of \$50,000.00 issued by Fidelity and Deposit Company of Maryland 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 twenty-three (23) claims filed within the examination period. The claims appear to reflect survey matters and oversights of employees of the Agent, which purport missed easements, encroachments, liens, and/or rights of access. There does not appear to be any material 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, detailed as follows:

| Violation of IDAPA 18.05.01.031.01, 18.05.01.031.04(a), and Attachment to Idaho Rule 18.05.01, Exhibit 1(1)(2). | | |
|---|------------------|--|
| Exception Number | Date of Expense | Examination Findings |
| 1 | December 7, 2022 | The Agent, on one (1) occasion, expended a total of \$332.26 at Fred Meyer, which included various items of value such as gift items, food, beverages, and gift cards. These items, which are specifically not permitted, were provided as self-promotional marketing to four (4) producers of title business. |
| 2 | May 10, 2023 | The Agent, on one (1) occasion, provided an item of value, specifically a \$125.00 financial sponsorship, to The Easy Home Buyer, LLC, a producer of title business, for their educational event held in Washington State. |

IDAPA 18.05.01.031.01 states in relevant part, with emphasis added: “**Items of Value.** A title entity **will not** provide items of value to a producer of title business, consumer or member of the general public **except** as permitted in Sections 031.02, 031.03, 031.04 and 031.05 of this chapter. If a providing of things of value **does not clearly fit into the rules . . . then it is not allowed.**”

IDAPA 18.05.01.031.04(a) states in relevant part, with emphasis added: “**Self-Promotional Advertising.** 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.** . . .”

EXHIBIT 1(1)(2), state in relevant part, with emphasis added: *“A title entity shall not provide items of value except as provided in Sections 031.02, 031.03, 031.04, and 031.05 of IDAPA 18.05.01. The following is a partial, but not all inclusive, list of acts and practices which are considered illegal inducements not permitted by the Idaho Insurance Code: 1. A title entity will not sponsor any activity off its premises unless the producer of title business bears the entire cost of the activity. . . . 2. A title entity will not sponsor, subsidize, supply prizes or labor, or otherwise provide items of value for promotional activities of producers of title business. . . .”*

Violation, Exception #1: The Agent, on one (1) occasion, was in violation of IDAPA 18.05.01.031.01 and IDAPA 18.05.01.031.04(a) for providing self-promotional items of value that are explicitly not allowed. Specifically, the Agent provided a total of \$332.26 in self-promotional items of value, including food, beverage, and gift cards to four (4) producers of title business.

Violation, Exception #2: The Agent, on one (1) occasion, was in violation of IDAPA 18.05.01.031.01, IDAPA 18.05.01.031.04(a), and Exhibit 1(1)(2) for providing financial sponsorship in the amount of \$125.00, an item of value not allowed, to The Easy Home Buyer, LLC, a producer of title business.

Recommendations: It is recommended that the Agent submit a written proposal to the Department outlining the proposed procedures that will be implemented to ensure any future items of value provided to producers of title business are compliant with IDAPA 18.05.01.031.01, 18.05.01.031.04(a) and Exhibit 1(1)(2).

It is further recommended, as this is the first instance of these violations, that no administrative penalties be imposed at this time. The Department retains the right to impose new penalties based on any future finding of these same violations.

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 Chantelle Fuhrman, and is comprised of herself, three (3) title officers, and two (2) title assistants. The title plant is owned, posted, and maintained by the Agent in Coeur d’Alene, 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 Chantelle Fuhrman, and is comprised of herself, four (4) escrow officers, and four (4) 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 the Agent's corporate escrow services group. The monthly reconciliations are reviewed by Victoria Marshall, Assistant Controller at Financial Services Group. 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 below identify corrective measures the Department finds necessary as a result of the exceptions noted within the Report.

1) Advertising and Marketing (Section II., pages 8-9.)

- **Two (2) Exceptions:** IDAPA 18.05.01.031.01, 18.05.01.031.04(a), and Exhibit 1(1)(2).


It is recommended that the Agent submit a written proposal to the Department outlining the proposed procedures that will be implemented to ensure any future items of value provided to producers of title business are compliant with IDAPA 18.05.01.031.01, 18.05.01.031.04(a) and Exhibit 1(1)(2).

It is further recommended, as this is the first instance of these violations, that no administrative penalties be imposed at this time. The Department retains the right to impose new penalties based on any future finding of these same violations.

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,

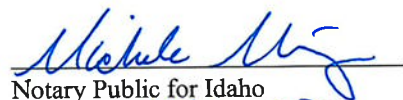
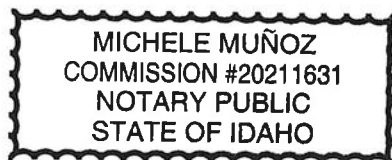


Matt LeLong

Market Examiner and Title Insurance Specialist

Idaho Department of Insurance

SUBSCRIBED AND SWORN to before me this 17th day of October, 2024.



Notary Public for Idaho

Residing at: Boise, ID

Commission Expires: 03-30-2024

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 two (2) separate occasions provided items of value that are not allowed. (1) On one (1) occasion, the Agent expended a total of \$332.26 at Fred Meyer, which included items of value explicitly not allowed, including food, beverage, and gift cards and provided them as self-promotional marketing gifts to four (4) producers of title business; and (2) on one (1) occasion, the Agent provided a \$125.00 financial sponsorship to The Easy Home Buyer, LLC, a producer of title business, for their educational event held in Washington State.

These actions constitute violations of IDAPA 18.05.01.031.01, IDAPA 18.05.01.031.04(a) and Exhibit 1(1)(2). Administrative penalties are appropriate pursuant to Idaho Code §§ 41-117, 41-1016, and 41-2708(3); however, as this is the first instance of these violations, no administrative penalties will be imposed at this time, with the stipulation that the Department retains the right to impose new penalties based on any future finding of these same violations.

No later than thirty (30) days from the service date of the adopted Final Order, the Agent is required to submit to the Department in writing what proposed procedures will be implemented to ensure any future items of value provided to producers of title business are compliant with IDAPA 18.05.01.031.01, IDAPA 18.05.01.031.04(a) and Exhibit 1(1)(2).

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, 2023, of:

**North Idaho Title Insurance, Inc.
601 E. Front Avenue, Suite #204
Coeur d'Alene, Idaho 83814-5169
License #31783 – Kootenai County**

By executing this Waiver, Darrell Martin [print or type officer/director name], on behalf of North Idaho Title Insurance, Inc., hereby acknowledges receipt of the above-described examination report, verified as of the 17th day of October 2024, and by this Waiver hereby consents to the immediate entry of a final order by the Director of the Department of Insurance (the "Director") adopting said report without any modifications, except under circumstances the Director under his lawful duties and powers may abate, adopt, or amend, any recommendations and/or penalties imposed by the examiner-in-charge.

By executing this Waiver, North Idaho Title Insurance, Inc., 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 41-2710(7) and 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)(a), Idaho Code, or elsewhere in the Idaho Code.

Dated this 28th day of October, 2024

North Idaho Title Insurance, Inc.

Darrell Martin

Name (print)



Name (signature)

Executive Vice President & Secretary

Title

EXHIBIT

B