

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

**STATE OF IDAHO**

In the Matter of:

SECURED LAND TRANSFERS, LLC  
[Gem County] DBA TitleOne

Idaho Title Agency License No. 720776

Docket No. 18-4652-25

**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 SECURED LAND TRANSFERS, LLC [Gem County], doing business as TitleOne (“Secured”) 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 Secured for the period April 30, 2019, to December 31, 2023 (“Report”), as filed.

**FINDINGS OF FACT**

1. Secured is a title agency licensed by the Department to transact title insurance in Gem County, Idaho, under Title Agency License No. 720776.
2. The Department completed an examination of Secured pursuant to Idaho Code §§ 41-2710(7) and 41-219(1) and (5) on or about October 23, 2024. 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 February 5, 2025, and was transmitted to Secured on February 6, 2025. A copy of the Report is attached hereto as Exhibit A.

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

5. On February 7, 2025, the Department received a Waiver from Secured, signed by Jessica Meade, its Chief Operating Officer. By execution of such Waiver, a copy of which is attached hereto as Exhibit B, Secured 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. Having fully considered the Report, the Director concludes that, with regard to the matters examined and information provided by Secured, the comments and recommendations contained in 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 of SECURED LAND TRANSFERS, LLC [Gem County] DBA TitleOne for the period April 30, 2019, to December 31, 2023, 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, Secured will 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 SO ORDERED.**

DATED this 3 day of March, 2025.

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 Director 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 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 party seeking review of the order resides or operates its principal place of business in Idaho; or (4) the real property or personal property that was the subject of the agency decision 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 a 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. *See* Idaho Code § 67-5274.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 3<sup>rd</sup> day of March, 2025, 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:

Secured Land Transfers, LLC Jessica Meade, COO 1101 W. River Street, Ste. 201 Boise, ID 83702-7068	<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: <a href="mailto:jmeade@titleonecorp.com">jmeade@titleonecorp.com</a>
Secured Land Transfers, LLC Andy Garrison	<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: <a href="mailto:agarrison@titleonecorp.com">agarrison@titleonecorp.com</a>

  
\_\_\_\_\_  
Jan Noriyuki  
Paralegal

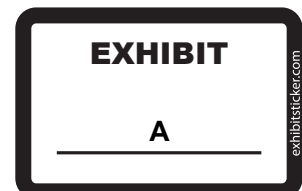


REPORT OF EXCEPTION EXAMINATION  
For the Period April 30, 2019 through December 31, 2023

Of  
SECURED LAND TRANSFERS, LLC  
d/b/a  
TITLEONE  
(a title agent limited liability company - license #720776 – Gem County)

As of  
December 31, 2023

*Equal Opportunity Employer*



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Boise, Idaho  
October 23, 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;

Secured Land Transfers, LLC  
d/b/a  
TitleOne  
1101 W. River Street, Suite 201  
Boise, Idaho 83702-7068  
License #720776 – Gem 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 Secured Land Transfers, LLC, d/b/a TitleOne, an Idaho Title Agent licensed in Gem County. The examination was conducted remotely from the offices of the Idaho Department of Insurance (the “Department”) located at 700 West State Street, 3<sup>rd</sup> 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.

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. Furthermore, 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 comprises 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 April 30, 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**

Our examination of the Agent did not disclose any material adverse findings. No exceptions and recommendations were noted as a result of the examination.

## **HISTORY AND DESCRIPTION**

TitleOne Corporation was duly incorporated, with its Articles of Incorporation filed with the Idaho Secretary of State (“ISOS”) on May 3, 2000. On May 23, 2000, TitleOne Corporation’s initial Idaho operations commenced when they were licensed as a title agent by the Department in Ada County. In October of 2011, they acquired Idaho Title and Trust, Inc. and merged with Vandelay LLC in September of 2016 wherein TitleOne Corporation was the surviving entity. As a result of the merger, Title Resource Group became the sole shareholder of TitleOne Corporation. On February 7, 2018, Secured Land Transfers, LLC, the current entity and Agent subject to this examination, was formed and issued a Certificate of Registration by the ISOS. On February 22, 2019, a Statement of Merger was filed with the ISOS, merging TitleOne Corporation and TitleOne Exchange Company into Secured Land Transfers, LLC and they subsequently filed an assumed business name of TitleOne. On April 30, 2019, the Agent expanded its operations to include Gem County and was duly licensed as a title agent by the Department. They operate across much of the state, holding a title agent license in twenty-five (25) counties. They conduct business in Gem County from their offices located in Canyon and Ada Counties, Idaho.

## **PRIOR EXAMINATION**

Our examination included a review to identify if exceptions were noted in the preceding report of exception examination and whether those exceptions were satisfactorily addressed. The Agent was

licensed and commenced operations in Gem County on April 30, 2019. Consequently, no prior report of exception examination was available for review.

## **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 February 7, 2024, the Idaho Secretary of State shows the Agent's status as active-existing, listing Corporate Creations Network, Inc. as the registered agent and the managing members as Stephanie E. Witmer and Lisa Estevan. The Agent's in-state executive management comprises Jason Vickrey as President, with serving Directors listed as Logan Coulter, Patricia M. Coulter, Michael Stephen Hammer, Veronica Hern, Cameron McFaddan, Jessica D. Meade, Laura Page, Randal A Rabehl, Ryan Taylor, and Amy Wilcoxson. 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 Chicago Title Insurance Company, Commonwealth Land Title Insurance Company, DOMA Title Insurance, Inc, Fidelity National Title Insurance Company, First American Title Insurance Company, Old Republic National Title Insurance Company, Stewart Title Guaranty Company, Title Resources Guaranty Company, and Westcor Land Title Insurance Company. The underwriting contracts are subject to high liability limits, without underwriter approval, ranging from \$4,000,000.00 to \$5,000,000.00 with deductibles for loss of \$5,000.00. 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 #285059775 in the amount of \$50,000.00 issued by Liberty Mutual Insurance 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 that there were no claims filed within the examination period. 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. No exceptions were noted as a result of this portion of the examination.

**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 Matthew Carey and comprises seventeen (17) Title Officers and four (4) Title Assistants. The title plant for Gem County is owned by the Agent and housed at a secure central data center with its posting and maintenance provided through contractual agreement. 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 Samantha Keller and comprises sixteen (16) Escrow Officers, and twenty-six (26) 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 Accounting Team. The monthly

reconciliations are reviewed by Randy Rabehl, Director and Chief Financial Officer of 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. No exceptions were noted as a result of this portion of the examination.

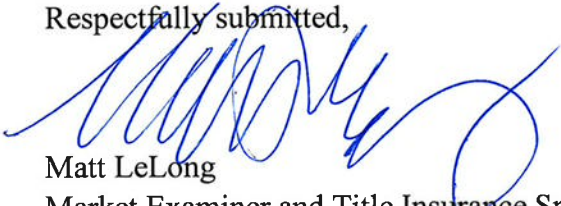
**SUMMARY OF RECOMMENDATIONS**

There were no recommendations as a result of the examination.

## 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.


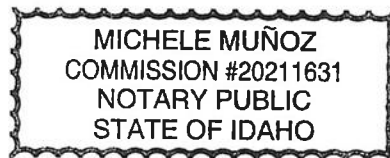
Respectfully submitted,



Matt LeLong

Market Examiner and Title Insurance Specialist  
Idaho Department of Insurance

SUBSCRIBED AND SWORN to before me this 5<sup>th</sup> day of February, 2025



Notary Public for Idaho  
Residing at: Boise, ID  
Commission Expires: 03-30-2027

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 Reports of Exception Examination as of December 31, 2023, of:

**Secured Land Transfers, LLC**

d/b/a

**TitleOne**

**1101 W. River Street, Suite 201**

**Boise, Idaho 83702-7068**

Lic #712441 - Ada County	Lic #3002401554 - Bingham County	Lic #16942151 - Blaine County
Lic #712451 - Boise County	Lic #723313 - Bonner County	Lic #712468 - Bonneville County
Lic #712469 - Butte County	Lic #712480 - Canyon County	Lic #712473 - Cassia County
Lic #3002775530 - Elmore County	Lic #720776 - Gem County	Lic #712485 - Gooding County
Lic #712489 - Jefferson County	Lic #712499 - Jerome County	Lic #712500 - Kootenai County
Lic #712502 - Lincoln County	Lic #712503 - Minidoka County	Lic #831395 - Nez Perce County
Lic #820744 - Owyhee County	Lic #773779 - Payette County	Lic #879243 - Teton County
Lic #712505 - Twin Falls County	Lic #3002269498 - Valley County	Lic #773777 - Washington County

By executing this Waiver, Jessica Meade [print or type officer/director name], on behalf of Secured Land Transfers, LLC, hereby acknowledges receipt of the above-described examination reports, verified as of the 5th day of February 2025, 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, Secured Land Transfers, LLC, 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 7<sup>th</sup> day of February, 2025

**Secured Land Transfers, LLC**

Jessica Meade / CDO  
Name / Title (print)

Jessica Meade  
Name (signature)

*Equal Opportunity Employer*

**EXHIBIT**

B

exhibiticker.com