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Department of Insurance
State of Idaho

Attorneys for the Department of Insurance

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

In the Matter of:

NORTHWEST TITLE, LLC,
dba NEXTITLE
[Kootenai County]

Idaho Title Agency License No. 399366

Docket No. 18-3275-17

**ORDER ADOPTING REPORT
OF EXCEPTION EXAMINATION
AS OF DECEMBER 31, 2015**

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 NORTHWEST TITLE, LLC, doing business as NEXTITLE (NexTitle), to ascertain compliance with title 41, Idaho Code, and related rules, pursuant to Idaho Code §§ 41-2710(7) and 41-219(1) and (5), hereby alleges the following facts that constitute a basis for issuance of an order, pursuant to Idaho Code § 41-227(5)(a), adopting the Report of Exception Examination of Northwest Title, LLC dba NexTitle [Kootenai County] for the Period January 1, 2011 to December 31, 2015 (Report), as filed.

FINDINGS OF FACT

1. NexTitle is a title agency licensed by the Department to transact title insurance in Kootenai County, Idaho, under Title Agency License No. 399366.

2. The Department completed an examination of NexTitle pursuant to Idaho Code §§ 41-2710(7) and 41-219(1) and (5) on or about December 15, 2016. 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 December 15, 2016, and was transmitted to NexTitle on December 29, 2016. A copy of the Report is attached hereto as Exhibit A.

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

5. On or about January 13, 2017, the Department received a Waiver from NexTitle signed by Kris Miller, its Idaho Operations Manager. By execution of such Waiver, a copy of which is attached hereto as Exhibit B, NexTitle 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 from the Director's final order.

6. No request for hearing, written submission, or rebuttal with respect to any matter contained in the Report was received by the Department from NexTitle.

CONCLUSIONS OF LAW

7. 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.

8. Having fully considered the Report, the Director concludes that, with regard to the matters examined and information provided by NexTitle, the comments and recommendations contained in the Report, including the Examiner’s determination of violations of Department rules by NexTitle and corrective actions to be taken identified at page 11 of the Report, Exhibit A, 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 Northwest Title, LLC dba NexTitle [Kootenai County] for the Period January 1, 2011 to December 31, 2015, 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, Amerititle shall file with the Department’s Examiner Title & Market Insurance Specialist affidavits executed by each of its directors or, if none, its principal officers, stating under oath that they have received a copy of the adopted Report and related orders.

IT IS FURTHER ORDERED that, no later than thirty (30) days from the date of verification of the Report attached hereto, Amerititle shall prepare and distribute written procedures for its staff regarding proper handling and billing of title commitment cancellation

fees. A copy of such procedures or instructions shall simultaneously be provided to the Department.

IT IS FURTHER ORDERED that an administrative penalty in the amount of three hundred dollars (\$300.00) is imposed against NexTitle, pursuant to IDAPA 18.01.25.004.01 and 18.01.56.018.01; provided, however, that such penalty is waived subject to the following:

- The Department retains the right to perform a target examination of NexTitle at any time regarding cancellations and billings for such cancellations and to impose new penalties based on findings of violation; and
- NexTitle shall provide to the Department, by no later than July 31, 2017, a report of all cancellations of title commitments for the period January 1, 2017, through June 30, 2017. Such report shall be provided in the manner and include such information as prescribed by the Department.

IT IS SO ORDERED.

DATED this 27 day of January, 2017.

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 the 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 30th day of January, 2017, I caused a true and correct copy of the foregoing ORDER ADOPTING REPORT OF EXCEPTION EXAMINATION AS OF DECEMBER 31, 2015, to be served upon the following by the designated means:

Northwest Title, LLC dba NexTitle
Attn: Kris Miller, Idaho Operations Manager
1880 S. Cobalt Point Way, Suite 100
Meridian, ID 83642-5893

- first class mail
- certified mail
- hand delivery
- email

Hermoliva Abejar
Chief Deputy Examiner
Idaho Department of Insurance
700 W. State Street, 3rd Floor
Boise, ID 83720-0043
hermoliva.abejar@doi.idaho.gov

- first class mail
- certified mail
- hand delivery
- email





REPORT OF EXCEPTION EXAMINATION
For the Period January 1, 2011 to December 31, 2015

Of

Northwest Title, LLC
dba NexTitle
(a title agent corporation - license #399366 – Kootenai County)

As of

December 31, 2015



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Boise, Idaho
November 9, 2016

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;

Northwest Title, LLC
dba NexTitle
1880 S Cobalt Point Way, Suite 100
Meridian, Idaho 83642
License #399366 – Kootenai County

Hereinafter referred to as “Title Agent”.

The following Report of Exception Examination is respectfully submitted.

FOREWORD

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

The examination was conducted at the Title Agent's office located at 1880 South Cobalt Point Way, Suite 100, in Meridian, Idaho and remotely at the offices of AM Interim Services LLC located at 5122 S. Adonis Way in Boise, Idaho. In performing this examination, the examiner(s) reviewed a sample of the Title Agent's procedures, files, and documentation. Some noncompliant practices may not have been discovered during this examination. As such, this report may not fully reflect all the procedures and practices of the Title Agent.

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

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

PURPOSE AND SCOPE OF EXAMINATION

The purpose of the examination is to determine compliance with applicable Idaho Statutes and regulations, and rules promulgated 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, 2011 through December 31, 2015. Specific areas examined include operations/management, claims, advertising and marketing, title file review and escrow fiduciary account and file review.

The Department's authority to conduct the examination includes, but is not limited to, Idaho Code § 41-2710(7), which grants authority for regular examinations of a title agent's tract indexes, abstract records, and any other records to ascertain compliance with title 41, Idaho Code, and related rules, to occur 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.

HISTORY AND DESCRIPTION

Realty in Motion LLC, based in Bellevue Washington, is a group of companies including title agencies (NexTitle), trustee companies (e.g. Northwest Trustee Services, Inc.), newspapers (RIM Publications), a posting and publication company (Foreclosure Expeditors/Initiators, LLC), and websites (e.g. USA-Foreclosure.com). Realty in Motion LLC owns 100% of Northwest Title LLC, dba NexTitle.

Northwest Title LLC, dba NexTitle was established in Idaho on March 18, 2010. They were licensed in Kootenai County with the Department on December 27, 2011. They conduct business out of offices in Meridian, Idaho. Kris Miller is the Idaho Operations Manager.

PRIOR EXAMINATION

The examination included a review to determine if exceptions were noted in a preceding report of examination and whether those exceptions were addressed. There was no previous examination. The Title Agent was licensed in Idaho on December 27, 2011 therefore, this is the first examination.

PRIOR ESCROW AUDIT

The examination included a review to determine if exceptions were noted in the December 31, 2014 escrow audit completed by Ms. Jennifer Shaw of Westcor Land Title Insurance Company which covered the period July 1, 2011 through October 31, 2014 and whether those exceptions were addressed. One (1) exception condition was noted. We determined that the agent satisfactorily addressed those exceptions in January of 2015. No exceptions were noted as a result of this current portion of the examination.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

I. OPERATIONS AND MANAGEMENT

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

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

The Idaho Secretary of state lists Realty in Motion LLC out of Bellevue Washington as 100% owner of Northwest Title LLC and include owners Stephen Routh CEO, David Fennell, Larry Johnson, and Joel Freedman. The assumed business name, NexTitle, was filed with the Idaho Secretary of State's Office on August 11, 2011. Erin Sheckler is the acting President of NexTitle and Kris Miller, Idaho State Manager, is the office manager. No exceptions were noted as a result of this portion of the examination.

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

The Title Agent has underwriting agreements with Westcor Land Title Insurance Company, North American Title Insurance Company, Old Republic National Title Insurance Company and First American Title Insurance Company. The underwriting contracts high liability approval requirements range from \$500,000.00 to \$1,000,000.00 with a range of \$2,500.00 to \$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 18.01.25.011.08 & 09**

The Department has on file surety bond #70956858 in the amount of \$50,000.00 issued by Western Surety Company on behalf of the Title Agent. The examination confirmed this bond to be currently active. No exceptions were noted as a result of this portion of the examination.

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

The Title Agent reported that there were no claim losses during the examination period. Additionally, we did not find material issues with the title plant during the examination. No exceptions were noted as a result of this portion of the examination.

II. ADVERTISING AND MARKETING

Idaho Code § 41-2708(3) & (4)

IDAPA 18.01.39.014 & 18.01.56

The examination included a review of the Title Agent's marketing and sales practices. An examination of Northwest Title, LLC, Ada and Canyon Counties completed in 2015 included a review of marketing and sales practices of this Title Agent. A general ledger for each year under examination for all accounts involving contributions, donations, sales expenses, travel and meal expenses, Title Agent/staff function expenses, as well as samples of listing packages or property profiles were requested and received. After a cursory review of the general ledgers, samples were picked within our examination parameters. Supporting documents for the samples were requested, received and reviewed.

During the examination, the following exception regarding title and escrow rate flyers was noted. The title rate flyer did not specify which insurer rates or effective dates were provided and the escrow rates flyer did not specify the minimum premium.

Idaho Code § 41-1304 states: No person shall make, publish, disseminate, circulate, or place before the public, or cause, directly or indirectly, to be made, published, disseminated, circulated, or placed before the public, in a newspaper, magazine or other publication, or in the form of a notice, circular, pamphlet, letter or poster, or over any radio or television station, or in any other way, any advertisement, announcement, or statement containing any assertion, representation or statement with respect to the business of insurance or with respect to any person in the conduct of his insurance business, which is untrue, deceptive or misleading

These forms are considered ambiguous or misleading. The agent is in violation of Idaho Code §41-1304.

The Title Agent has revised the title rate flyer to reflect that the rates provided are for Westcor Land Title Insurance Company. The Title Agent has revised the escrow rate flyer to reflect that a minimum escrow rate is being charged for values up to and including \$38,000.00. Additionally, a disclaimer indicating the minimum escrow rate charged has been added.

Recommendation

The Title Agent has corrected the exceptions noted in the examination. No administrative sanctions or penalties are recommended at this time as this is the first instance of this violation noted in an examination and it has been corrected.

III. TITLE FILE REVIEW

Idaho Code §§ 41-2702, 2708 & 2709

IDAPA 18.01.25 & 18.01.56.017 & Exhibit 1(9)

The Title Agent's Title Department is managed by Alan Chang and is comprised of three (3) title officers and one (1) assistant. The title plant is posted and maintained by the Title Agent in Meridian, 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, cancellation fees, and unique kind or class of risk.

During the examination, the following exceptions regarding the charging for and/or failing to make efforts to collect cancellation fees was noted:

| |
|---|
| Commitment #NXID-0166740 was cancelled after July 23, 2014 and no cancellation fee was charged. |
|---|

Pursuant to IDAPA 18.01.25.004.01...“where a preliminary report is issued, the order for the policy may be canceled prior to closing upon applicant being required to pay a cancellation charge of fifty percent (50%) of the premium with a minimum of fifty dollars (\$50) provided that any portion of the charge in excess of one hundred dollars (\$100) may be waived....”

IDAPA 18.01.25.004.02.d provides that no title insurance agent shall “issue a title insurance binder, commitment or preliminary report without an order and without making a charge therefor if a policy is not issued thereon....”

Furthermore, pursuant to IDAPA 18.01.56, EXHIBIT 1.9...“A title entity shall not waive a cancellation fee, fail to charge for a cancellation fee, or otherwise fail to make efforts to collect a cancellation fee from the recipient of services provided by the title entity.” When a title commitment issued by a title agent in response to an order does not result in a policy of title insurance, the title agent must charge a cancellation fee in the amount required by the rules and make an effort to actually collect the cancellation fee. IDAPA 18.01.39.10.04 and 18.01.56.010.05 define uncollected cancellation fees for title commitments as “things of value.” Additionally, providing things of value such as uncollected cancellation fees to a customer is considered an illegal inducement.

On July 23, 2014, an advisory addressing the issues on charging and collection of cancellation fees was issued by the Department to all title agents. Within that advisory, the agents were reminded that providing things of value such as uncollected cancellation fees to a customer is considered an illegal inducement.

The Title Agent was in violation of IDAPA 18.01.25.004.01, 18.01.25.004.02.d, 18.01.56, EXHIBIT 1.9, and 18.01.56.11 by not charging cancellation fees.

The Title Agent provided this response. “Applicable staff for the company have been reminded and instructed to issue an invoice for the cancellation fee promptly upon cancellation of a file where the fee is applicable.”

Recommendations

It is recommended that the Title Agent submit to the Department in writing what proposed procedures will be implemented to ensure that all future cancellations of title commitments are compliant with IDAPA 18.01.25.004.01 and IDAPA 18.01.56, EXHIBIT 1.9.

It is also recommended that the Director enter an order for administrative penalties as a result of violating IDAPA 18.01.25.004.01, 18.01.25.004.02.d, 18.01.56, EXHIBIT 1.9, and 18.01.56.11 in the amount of \$300.00.

IV. ESCROW FIDUCIARY ACCOUNTS AND FILE REVIEW

The Title Agent’s Escrow Department is managed by Kris Miller and is comprised of eight (8) escrow officers, and eight (8) escrow assistants. All escrow officers and assistants are based and work out of the Meridian, Idaho office.

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

The examination included a review of the fiduciary accounts utilized during the examination period. The account was reviewed for correct labeling, separation from operating funds, reconciliation, and negative balances. The fiduciary account for this office is balanced on a daily basis and reconciled on a monthly basis by Asa Fox at the Bellevue, Washington office. Monthly reconciliations are reviewed by Kris Miller. No exceptions were noted as a result of this portion of the examination.


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

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 by the Title Agent, 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.

CONCLUSION

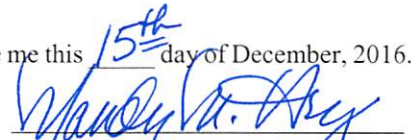
I certify and attest that I have examined the Title Agent's tract indexes, abstract records, as well as other records, and the operation of the Title Agent's business and other matters relevant to the affairs of the Title Agent. I further certify that I have no relationship, other than in my capacity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

Respectfully submitted,



Arlene Barrie
Examiner-in-Charge

SUBSCRIBED AND SWORN to before me this 15th day of December, 2016.



Notary Public for Idaho
Residing at: Boise, Idaho
Commission Expires: 7/24/18



PENALTY, STIPULATIONS AND APPEAL NOTIFICATION

This matter comes before the Idaho Department of Insurance (“Department”) as a result of this Report of Exception Examination (“Examination”). The Department has fully considered and reviewed this Examination, the written submissions and rebuttals provided November 2, 2016, by the Title Agent in response to the Examination, and the recommendations of the Examiner.

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

1. The Title Agent, on one (1) occasion, failed to charge a cancellation fee for a cancelled title commitment. This failure constitute a violation of IDAPA 18.01.25.004.01, 18.01.25.004.02.d, 18.01.56, EXHIBIT 1.9, and 18.01.56.11.

No later than thirty (30) days from the date this Examination was verified the Title Agent is required to prepare and distribute written procedures for its staff regarding proper handling and billing of title commitment cancellation fees. A copy of such procedures/instructions should also be provided to the Department within the same time frame.

The Department shall assess a penalty in the amount of \$300.00 in accordance with IDAPA 18.01.25.004.01 and 18.01.56.018.01. However, the Department waives this penalty with the stipulation and understanding that the Department retains the right to perform a target exam anytime in the future regarding cancellations and billings for such cancellations and impose new penalties based on any findings of violations. The Department requires the Title Agent to provide a report to the Department of all cancellations of title commitments for the period January 1, 2017 through June 30, 2017 with the information in the Excel format attached. This report is due July 31, 2017.

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

I certify that on this 29th day of December, 2016, I submitted a final copy of this Report to the Director of the Idaho Department of Insurance and served a final copy of the same by Electronic Mail to:

Kris Miller
Idaho State Manager
Northwest Title, LLC dba NexTitle
1880 South Cobalt Point Way, Suite #100
Meridian, Idaho 83642
klmiller@nextitle.com

A handwritten signature in blue ink, appearing to read "J. Scanlon". The signature is stylized and cursive.

Jim Scanlon
Examiner Title & Market Insurance Specialist
Idaho Department of Insurance

State of Idaho
DEPARTMENT OF INSURANCE

C. L. "BUTCH" OTTER
Governor

700 West State Street, 3rd Floor
P.O. Box 83720
Boise, Idaho 83720-0043
Phone (208)334-4250
FAX # (208)334-4398

DEAN L CAMERON
Director

WAIVER

In the matter of the Report of Examination as of December 31, 2015, of:

**Northwest Title, LLC dba NexTitle
License # 399366 – Kootenai County
1880 South Cobalt Point Way, Suite #100
Meridian, ID 83642**

By executing this Waiver, the Agent hereby acknowledges receipt of the above-described examination report, verified as of the 28th day of December 2016, 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 thirty (28) days as provided in Idaho Code section 41-2710(7),
2. its right to make additional written submission or rebuttal 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 13th day of January, 2017

NAME OF ENTITY UNDER EXAMINATION

Kris Miller

Name (print)

[Signature]

Name (signature)

Idaho Operations Manager

Title

