

FILED
DEC 23 2020 AM
Department of Insurance
State of Idaho

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

In the Matter of:

EMPIRE TITLE, LLC
[Ada County]

Idaho Title Agency License No. 708318

Docket No. 18-3884-20

**ORDER ADOPTING REPORT
OF EXCEPTION EXAMINATION
AS OF DECEMBER 31, 2019**

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 EMPIRE TITLE, LLC (“EMPIRE”), 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 for the Period January 31, 2019, to December 31, 2019, of Empire Title, LLC, as of December 31, 2019 (“Report”), as filed.

FINDINGS OF FACT

1. EMPIRE is a title agency licensed by the Department to transact title insurance in Ada County, Idaho, under Title Agency License No. 708318.
2. The Department completed an examination of EMPIRE, pursuant to Idaho Code §§ 41-2710(7) and 41-219(1) and (5) on or about November 24, 2020. 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 1, 2020, and was transmitted to EMPIRE on the same date. A copy of the Report is attached hereto as Exhibit A.

4. Pursuant to Idaho Code § 41-2710(7), EMPIRE 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 December 1, 2020, the Department received a Waiver from EMPIRE signed by Kris Miller, its president. By execution of such Waiver, a copy of which is attached hereto as Exhibit B, EMPIRE 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.

CONCLUSIONS OF LAW

6. Idaho Code § 41-227(5) 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, rejecting the report and reopening the examination, or calling for an investigatory hearing.

7. Having fully considered the Report, the Director concludes that, with regard to the matters examined and information provided by EMPIRE, the comments, findings, and recommendations contained in the Report, including the Examiner’s determination of violations or noncompliance by EMPIRE and corrective actions to be taken identified on page 12 of 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 for the Period January 31, 2019, to December 31, 2019, of Empire Title, LLC, as of December 31, 2019, 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, EMPIRE 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, due to EMPIRE's distributing fifty-dollar (\$50) gift cards as self-promotional items to producers of title business on four (4) occasions, in violation of IDAPA 18.05.01.031.04.a¹, no later than thirty (30) days from the date of entry of the Final Order adopting the Report, EMPIRE shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future distributions of self-promotional items to producers of title business are in compliance with IDAPA 18.05.01.031.04.a and are not in excess of twenty-five dollars (\$25.00).

IT IS FURTHER ORDERED that, due to EMPIRE's providing non-title services to a producer of title business on five (5) occasions without charging for and receiving a commensurate

¹ IDAPA 18.01.56.014.01, as cited in the Report, was re-designated as IDAPA 18.05.01.031.04.a, effective March 20, 2020.

fee, in violation of IDAPA 18.05.01.031.01², no later than thirty (30) days from the date of entry of the Final Order adopting the Report, EMPIRE shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future non -title services are not provided without charging for and receiving a fee commensurate for the services provided.

IT IS FURTHER ORDERED that, due to EMPIRE's entertaining more than four (4) persons employed by or agents of a single producer of title business in a single day on two (2) occasions, in violation of IDAPA 18.05.01.031.05³, no later than thirty (30) days from the date of entry of the Final Order adopting the Report, EMPIRE shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future business entertainment expenses are in compliance with IDAPA 18.05.01.031.05.

IT IS FURTHER ORDERED that, any waiver of penalties for violations or noncompliance set forth above notwithstanding, the Department retains the right to impose new penalties based on any future findings of the same violations.

IT IS SO ORDERED.

DATED and EFFECTIVE this 17th day of December, 2020.

STATE OF IDAHO
DEPARTMENT OF INSURANCE



DEAN L. CAMERON
Director

² IDAPA 18.01.56 (Exhibit 1), as cited in the Report, was re-designated as IDAPA 18.05.01.031.01 (Exhibit 1), effective March 20, 2020.

³ IDAPA 18.01.56.015.01, as cited in the Report, was re-designated as IDAPA 18.05.01.031.05, effective March 20, 2020.

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 agency 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, 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 twenty-eight (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 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. Idaho Code § 67-5274.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 23rd day of December, 2020, I caused a true and correct copy of the foregoing ORDER ADOPTING REPORT OF EXCEPTION EXAMINATION AS OF DECEMBER 31, 2019, to be served upon the following by the designated means:

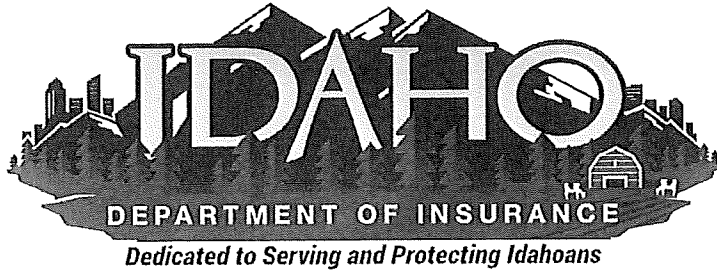
Empire Title, LLC
Kris Miller, President
2541 E Gala St., Ste. 100
Meridian, ID 83642-5330
miller@empiretitleidaho.com

- first class mail
- certified mail
- email

Edith L. Pacillo
Lead Deputy Attorney General
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043
edith.pacillo@doi.idaho.gov

- first class mail
- certified mail
- email


Pamela Murray



REPORT OF EXCEPTION EXAMINATION
For the Period January 31, 2019 to December 31, 2019
Of
Empire Title, LLC.
(A title agent corporation - license #708318 – Ada County)
As of
December 31, 2019

Equal Opportunity Employer

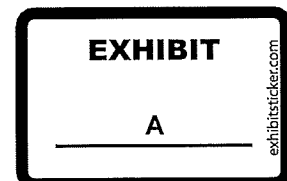


Table of Contents

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

Boise, Idaho
November 24, 2020

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;

Empire Title, LLC.
2541 E. Gala Street, Ste #100
Meridian, Idaho 83642-5330
License #708318 – Ada County

Hereinafter referred to as the “Agent”.

The following Report of Exception Examination is respectfully submitted.

FOREWORD

This is an exception examination report of the practices and procedures of Empire Title, LLC. an Idaho Title Agent licensed in Ada 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 remotely from the offices of 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. As such, this report may not fully reflect all of the procedures and practices of the Agent.

During the examination, the examiner(s) may cite violations made by the 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 agent. The report indicates where agreement was not possible.

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

PURPOSE AND SCOPE OF EXAMINATION

The purpose of this examination is to determine compliance with applicable Idaho Statutes, Idaho Department of Insurance regulations, and promulgated rules issued by the Department. In addition, examiners may have documented practices and procedures that did not appear to be in the best interest of Idaho insurance consumers.

The period covered by this examination is January 31, 2019 through December 31, 2019. Specific areas examined include operations/management, claims, advertising and marketing, title file review and escrow fiduciary account and file review.

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

HISTORY AND DESCRIPTION

Western Title Company, LLC. (Western) was incorporated in Idaho on January 22, 2019 through the Idaho Secretary of State's office. Western is a subsidiary of ET Investments, LLC, a Colorado limited liability company. They were licensed with the Idaho Department of Insurance on January 31, 2019 and began operations on February 4, 2019. On December 19, 2019 Western changed their name to Empire Title, LLC.

PRIOR EXAMINATION

Empire Title, LLC was licensed in Ada County on January 31, 2019 and began operations on February 4, 2019 so there is no previous examination. No exceptions were noted as a result of this portion of the examination.

SUMMARY OF 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 18.01.39.011, 012 & 013**

As of December 16, 2019, the Idaho Secretary of State lists Bryan Willis with ET Investments, LLC as the current Registered Agent and Meghan Martelon with ET Investments, LLC as managing member. No exceptions were noted as a result of this portion of the examination.

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

This Title Agent has underwriting contracts with Old Republic National Title Insurance Company, Stewart Title Guaranty Company, Westcor Land Title Insurance Company and First American Title Insurance Company. All underwriting contracts call for underwriting approval for all risks in excess of \$1,000,000.00 and a \$5,000.00 deductible for title losses. 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 Idaho Department of Insurance has on file surety bond #107039584 in the amount of \$50,000.00 issued by Travelers Casualty and Surety Company of America on behalf of the agent. We confirmed during the examination that this bond is currently active. No exceptions were noted as a result of this portion of the examination.

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

The agent reported three (3) claims during the examination period. The claims appear to be oversights on the part of employees of the Title Agent. There does not appear to be any problems 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 18.01.39.014 & 18.01.56

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, 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.

Self-Promotional Items

During the examination, the following exceptions regarding distributing self-promotional items were noted:

In February of 2019 staff member Kris Miller provided a \$50.00 gift card to a client.
In April of 2019 staff member Curt Pentecost provided two (2) \$50.00 gift cards to two (2) clients, one gift card each.
In May of 2019 staff member Curt Pentecost provided a \$50.00 gift card to a client.

IDAPA 18.01.56.014.01¹ states that "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." The Title Agent was in violation of IDAPA 18.01.56.014.01 by providing gift cards in excess of twenty-five (\$25) as a self-promotional item.

Providing Non-Title Services

During the examination, the following exception regarding providing non-title services, or similar benefit, to a producer of title business, without charging for and receiving a fee commensurate for services provided were noted:

Date of Service	Violation of IDAPA 18.01.56 Exhibit 1(7)
March 18, 2019	The Agent paid for and provided 250 printed business cards totaling \$27.56 to Chris Siverson, a producer of title business, without receiving reimbursement until April 7, 2019.

¹ IDAPA 18.01.56.014.01 was re-designated as IDAPA 18.05.01.031.04(a), effective March 20, 2020.

April 5, 2019	The Agent paid for and provided 500 printed business cards totaling \$53.50 to Camille Oeding, a producer of title business, without receiving reimbursement until April 18, 2019.
May 15, 2019	The Agent paid for and provided 250 printed business cards totaling \$28.67 to TJ Acree, a producer of title business.
May 16, 2019	The Agent paid for and provided 500 printed business cards totaling \$46.13 to Happy Homes For You, a producer of title business.
May 28, 2019	The Agent paid for and provided 1,000 printed business cards totaling \$49.40 to Lane Ranstrom, a producer of title business, without receiving reimbursement until June 4, 2019.

IDAPA 18.01.56 Exhibit 1(7)² states in part that “A title entity shall not provide, or offer to provide, non-title services (example: computerized bookkeeping, forms management, computer programming, trust accounting) or any similar benefit to a producer of title business, without charging for and receiving a fee commensurate for services provided.” The Title Agent was in violation of IDAPA 18.01.56 Exhibit 1(7) by providing a non-title service to a producer of title business without charging for and receiving a fee commensurate for services provided.

Entertainment Expenses

During the examination, the following exceptions regarding entertainment expenses were noted:

Date of Entertainment Expense	Violation of IDAPA 18.01.56.015.01
July 23, 2019	Staff member Julie Schott spent \$314.21 on entertainment expenses for twenty five (25) individuals who are agents of a single producer of title business.
October 28, 2019	Staff member Joe Hodges spent \$257.40 on entertainment expenses for twelve (12) individuals who are agents of a single producer of title business.

IDAPA 18.01.56.015.01³ states that “A title entity shall not expend more than one hundred dollars (\$100) per person per day for all meals and/or events. Meals and events shall include, but not be limited to, breakfast, brunch, lunch, dinner, cocktails, sporting events, sporting activities, trips and music and art events. These meals or events may occur on or off the title entity’s premises. In addition, a title entity may entertain no more than four (4) persons who are employed by or agents

² IDAPA 18.01.56 Exhibit 1(7) was re-designated as IDAPA 18.05.01 Exhibit 1(7), effective March 20, 2020.

³ IDAPA 18.01.56.015.01 was re-designated as IDAPA 18.05.01.031.05, effective March 20, 2020.

of any single producer of title business in a single day. Spouses and/or guests of the producers of title business or employees or agents thereof shall be included in the count for purposes of determining the four (4) person maximum. In addition, a person may not be entertained by a title entity more than three (3) days during any ten (10) day period of time. For purposes of determining the maximum permitted expenditure, all costs associated with any meals or events shall be considered. This shall include, but not be limited to, costs paid by the title entity for travel, transportation, hotel, equipment or facility rental, meals, cocktails, refreshments, registration or entry fees and event tickets. Entertainment permitted under this rule may not be conditional upon or compensation for forwarding or directing title business to the title entity. ” The Title Agent was in violation of IDAPA 18.01.56.015.01 by entertaining more than four (4) persons who are employed by, or agents of any single producer of title business in a single day.

Recommendation

It is recommended that the Title Agent provide in writing their proposed changes to procedures in order to maintain compliance with permitted self-promotional items, providing non-title services and advertising and marketing business expenses. No administrative sanctions or penalties are recommended at this time as this is the first instance of these violations noted in an examination for this Title Agent.

III. TITLE FILE REVIEW

Idaho Code §§ 41-2702, 2708 & 2709

IDAPA 18.01.25 & 18.01.56.017 & Exhibit 1(9)

The title department is managed by Troy Sears and consists of four (4) title officers. This location owns its title plant. 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 and proper disclosure of producers of title insurance. No exceptions were noted as a result of this portion of the examination.

IV. ESCROW FIDUCIARY ACCOUNTS AND FILE REVIEW

The Title Agent's Escrow Department is managed by Kenna Merrigan and is comprised of thirteen (13) escrow officers.

A. FIDUCIARY ACCOUNTS IDAPA 18.01.25.011.04, 05 & 10

This 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 accounts are balanced daily and reconciled on a monthly basis by the local Accounting Department. Monthly reconciliations are reviewed by the Trust Accounting Department and 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

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 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,

A handwritten signature in black ink, appearing to read 'J. Scanlon', written in a cursive style.

James Scanlon, MCM
Examiner Title and Market Insurance Specialist

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, any written submissions and rebuttals provided 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 four (4) occasions, provided fifty-dollar (\$50.00) gift cards as self-promotional items. These actions constitute violations of IDAPA 18.01.56.014.01.

No later than thirty (30) days from the date the Final Order is adopted, the Title Agent shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future distributions of self-promotional items 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 and are not in excess of twenty five dollars (\$25.00).

2. The Title Agent, on five (5) occasions, provided non-title services to a producer of title business without charging for and receiving a fee commensurate for services provided. These actions constitute a violation of IDAPA 18.01.56 Exhibit 1(7).

No later than thirty (30) days from the date the Final Order is adopted, the Title Agent shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future non-title services provided to a producer of title business are not provided without charging for and receiving a fee commensurate for services provided.

3. The Title Agent, on two (2) occasions, entertained more than four (4) persons who are employed by, or agents of any single producer of title business in a single day. These actions constitute a violation of IDAPA 18.01.56.015.01.

No later than thirty (30) days from the date the Final Order is adopted, the Title Agent shall provide written evidence to the Department that it has revised its processes and fully implemented procedures to ensure that future business entertainment expenses are in compliance with IDAPA 18.01.56.015.01.


These actions should be considered violations and administrative penalties are appropriate pursuant to Idaho Code §§ 41-117 and IDAPA 18.01.56.018.01 & .03⁴. However, as this is the first examination completed on this Title Agent, administrative penalties will not be imposed at this time with the stipulation and understanding that the Department retains the right to impose new penalties based on any future findings of these same violations.

⁴ IDAPA 18.01.56.018.01 & 03 were re-designated as IDAPA 18.05.01.031.07(a) & (c) effective March 20, 2020.

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.

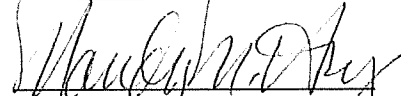
I certify that on this 24th day of November 2020, I submitted a final copy of this Report to the Director of the Idaho Department of Insurance and served a final copy of the same by Electronic Mail to:

Kris Miller
Market President
Empire Title, LLC
miller@empiretitleidaho.com



James Scanlon, MCM
Examiner Title & Market Insurance Specialist
Idaho Department of Insurance

SUBSCRIBED AND SWORN to before me this 1st day of December 2020.



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

MANDY M. ARY
COMMISSION #32608
NOTARY PUBLIC
STATE OF IDAHO

State of Idaho
DEPARTMENT OF INSURANCE

BRAD LITTLE
Governor

700 West State Street, 3rd Floor
P.O. Box 83720
Boise, Idaho 83720M0043
Phone (208)334-4250
FAX# (208)334-4398

DEAN L CAMERON
Director

WAIVER

In the matter of the Reports of Examination as of December 31, 2019, of:

Empire Title, LLC.
2541 E. Gala Street, Ste #100
Meridian, Idaho 83642-5330
License #708318 – Ada County
License #719355 – Canyon County

By executing this Waiver, the Agent hereby acknowledges receipt of the above-described examination reports, verified as of the 1st day of December 2020, and by this Waiver hereby consents to the immediate entry of final orders by the Director of the Department of insurance adopting said reports without any modifications.

By executing this Waiver, the Company also hereby waives:

1. its right to examine the reports 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 reports prior to entry of the final orders 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 orders adopting the reports as provided by section 41-227(6), Idaho Code, or elsewhere in the Idaho Code.

Dated this 1st day of December, 2020

EMPIRE TITLE, LLC.

Kris Miller

Name (print)

[Signature]

Name (signature)

President

Title

