

**DEPARTMENT OF INSURANCE, FINANCIAL  
INSTITUTIONS AND PROFESSIONAL REGISTRATION**

P.O. Box 690, Jefferson City, Mo. 65102-0690

In re: )  
 ) Investigation No. 11024-50237-PC  
Land Title Insurance Co. of St. Louis (NAIC #50237) )

**ORDER OF THE DIRECTOR**

NOW, on this 24<sup>th</sup> day of APRIL, 2012, Director John M. Huff, after consideration and review of the market conduct investigation of Land Title Insurance Company of St. Louis (NAIC #50237), (hereafter referred to as "the Company") investigation number 11024-50237--PC, conducted by the Division of Insurance Market Regulation pursuant to §374.190 RSMo, and the Stipulation of Settlement ("Stipulation"), does hereby issue the following orders:

This order, issued pursuant to §374.046.15, RSMo (Cum. Supp. 2010) and §374.280 RSMo, is in the public interest.

IT IS THEREFORE ORDERED that, the Company and the Division of Insurance Market Regulation having agreed to the Stipulation, the Director does hereby approve and agree to the Stipulation.

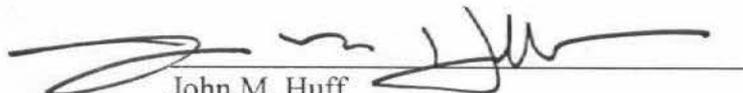
IT IS FURTHER ORDERED that the Company shall not engage in any of the violations of law and regulations set forth in the Stipulation and shall implement procedures to place the Company in full compliance with the requirements in the Stipulation and the statutes and regulations of the State of Missouri and to maintain those corrective actions at all times.

IT IS FURTHER ORDERED that the Company shall pay, and the Department of Insurance, Financial Institutions and Professional Registration, State of Missouri, shall accept, the Voluntary

Forfeiture of \$5,000, payable to the Missouri State School Fund.

IT IS SO ORDERED.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of my office in Jefferson City, Missouri, this 24<sup>th</sup> day of APRIL, 2012.

A handwritten signature in black ink, appearing to read "John M. Huff", is written over a horizontal line.

John M. Huff  
Director



RECEIVED  
APR 10 2012  
MO. DEPT. OF INSURANCE,  
FINANCIAL INSTITUTIONS &  
PROFESSIONAL REGISTRATION

**DEPARTMENT OF INSURANCE, FINANCIAL  
INSTITUTIONS AND PROFESSIONAL REGISTRATION**

P.O. Box 690, Jefferson City, Mo. 65102-0690

TO: First American Title Insurance Company  
1 First American Way  
Santa Ana, CA 92707

RE: Land Title Insurance Company of St. Louis (NAIC #50237)  
Missouri Market Conduct Investigation #11024-50237-PC

**STIPULATION OF SETTLEMENT  
AND VOLUNTARY FORFEITURE**

It is hereby stipulated and agreed by John M. Huff, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, hereinafter referred to as "Director," and First American Title Insurance Company (NAIC #50814), (hereafter referred to as "First American"), as follows:

WHEREAS, John M. Huff is the Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration (hereafter referred to as "the Department"), an agency of the State of Missouri, created and established for administering and enforcing all laws in relation to insurance companies doing business in the State in Missouri; and

WHEREAS, First American has been granted a certificate of authority to transact the business of insurance in the State of Missouri; and

WHEREAS, in August 2009 Land Title Insurance Company of St. Louis (NAIC #50237) (hereinafter referred to as "Land Title") was dissolved and was merged into First American;

WHEREAS, the Department conducted a Market Conduct Investigation of Land Title regarding its business practices prior to dissolution and prepared report number 11024-50237-PC; and

WHEREAS, the report of the Market Conduct Investigation revealed that:

1. In five (5) instances, Land Title terminated an agency relationship but failed to report the

termination and the reasons for the termination to the Director in violation of §381.018.5 RSMo.

WHEREAS, First American, after being advised by legal counsel, does hereby voluntarily and knowingly waive any and all rights for procedural requirements, including notice and an opportunity for a hearing, which may have otherwise applied to the above referenced Market Conduct Investigation; and

WHEREAS, First American hereby agrees to the imposition of the ORDER of the Director and as a result of Market Conduct Investigation #11024-50237-PC further agrees, voluntarily and knowingly to surrender and forfeit the sum of \$5,000.

NOW, THEREFORE, in lieu of the institution by the Director of any action for the SUSPENSION or REVOCATION of the Certificate(s) of Authority of First American to transact the business of insurance in the State of Missouri or the imposition of other sanctions, First American does hereby voluntarily and knowingly waive all rights to any hearing, does consent to the ORDER of the Director, and does surrender and forfeit the sum of \$5,000, such sum payable to the Missouri State School Fund, in accordance with §374.280, RSMo.

DATED: April 5, 2012

  
\_\_\_\_\_  
President  
First American Title Insurance Company  
Dennis J. Gilmore