



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

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

In re:)
) Investigation No. 11010-50026-PC
Premier Land Title Insurance Company f/k/a)
Commerce Title Insurance Company (NAIC #50026))

ORDER OF THE DIRECTOR

NOW, on this 15th day of NOVEMBER, 2011, Director John M. Huff, after consideration and review of the market conduct investigation of Premier Land Title Insurance Company f/k/a Commerce Title Insurance Company (NAIC #50026), (hereafter referred to as "the Company") investigation number 11010-50026-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.

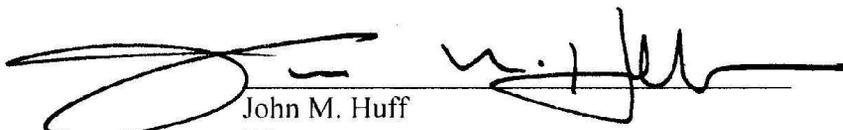
IT IS FURTHER ORDERED that the Company shall not engage in any of the violations of law and regulations set forth in the Stipulation and shall implement procedures to place the Company in full compliance with the requirements in the Stipulation and the statutes and regulations of the State of Missouri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

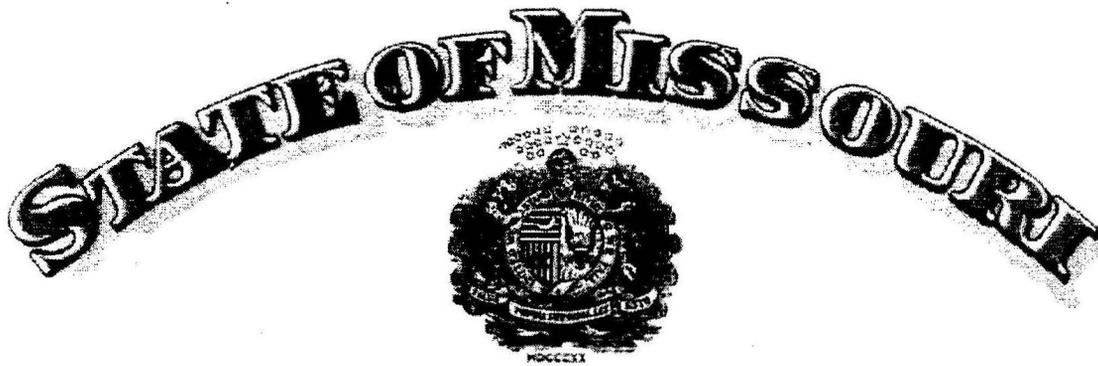
IT IS FURTHER ORDERED that the Company shall pay, and the Department of Insurance,

Financial Institutions and Professional Registration, State of Missouri, shall accept, the Voluntary Forfeiture of \$2,000, 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 15th day of NOVEMBER, 2011.


John M. Huff
Director



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

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

TO: Premier Land Title Insurance Company
f/k/a Commerce Title Insurance Company
2728 N. Harwood, 3rd Floor
Dallas, TX 75201

RE: Premier Land Title Insurance Company f/k/a Commerce Title Insurance Co. (NAIC #50026)
Missouri Market Conduct Investigation #11010-50026-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 Premier Land Title Insurance Company f/k/a Commerce Title Insurance Co. (NAIC #50026), (hereafter referred to as "Premier"), 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, Premier has been granted a certificate of authority to transact the business of insurance in the State of Missouri; and

WHEREAS, the Department conducted a Market Conduct Investigation of Commerce and prepared report number 11010-50026-PC; and

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

1. Premier failed to perform an on-site review of its agent for the years 2008, 2009, and 2010, failed to adopt and utilize the standards and procedures for on-site review of title agencies and agents, and failed to provide a copy of its review to the Department in violation of §§381.023.1, .2 and .4 RSMo and

20 CSR 500-7.080(1) (A) and (2); and

WHEREAS, Premier has voluntarily taken remedial action following the onset of this Investigation to bring it into compliance with the statutes and agrees to maintain those corrective actions at all times including, but not limited to, taking the following actions:

1. Premier agrees to take corrective action to assure that the errors noted in the above-referenced market conduct investigation report do not recur; and

2. Premier agrees to file documentation with the Director within 90 days of the entry of a final order closing this investigation of all remedial actions taken by it to implement compliance with the terms of this Stipulation.

WHEREAS, Premier, 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

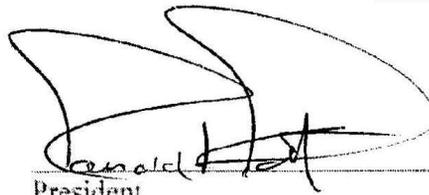
WHEREAS, execution of this Stipulation does not constitute an admission of liability, violation or wrongdoing by Premier; and

WHEREAS, Premier, after being advised by legal counsel, agrees and acknowledges that any violation of this Stipulation, including, but not limited to, engaging in any of the practices set forth in the report of the Market Conduct Investigation, shall be considered, for purposes of a future enforcement action by the Department, as a "knowing" violation subject to an enhanced forfeiture pursuant to §374.049.7 RSMo; and

WHEREAS, Premier hereby agrees to the imposition of the ORDER of the Director and as a result of Market Conduct Investigation #11010-50026-PC further agrees, voluntarily and knowingly to surrender and forfeit the sum of \$2,000.

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 Premier to transact the business of insurance in the State of Missouri or the imposition of other sanctions. Premier does hereby voluntarily and knowingly waive all rights to any hearing, does consent to the ORDER of the Director, does surrender and forfeit the sum of \$2,000, such sum payable to the Missouri State School Fund, in accordance with §374.280, RSMo.

DATED: 11/8/2011



President
Premier Land Title Insurance Company Dk/a
Commerce Title Insurance Company