

No. 2017- 4997

**OFFICIAL ORDER  
of the  
TEXAS COMMISSIONER OF INSURANCE**

Date: MAR 2 1 2017

**Subject Considered:**

**FIRST REPUBLIC TITLE, LLC**  
11767 Katy Freeway, Suite 850  
Houston, Texas 77079-1756

**CONSENT ORDER**  
TDI ENFORCEMENT FILE NO. 12099

**General remarks and official action taken:**

The commissioner of insurance considers whether disciplinary action should be taken against First Republic Title, LLC, which holds a title agency license issued by the Texas Department of Insurance.

**Waiver**

First Republic Title, LLC acknowledges that the Texas Insurance Code and other applicable laws provide certain rights. First Republic Title, LLC waives all of these rights, and any other applicable procedural rights, for the entry of this consent order.

Pursuant to TEX. INS. CODE § 82.055(b), First Republic Title, LLC agrees to this consent order with the express reservation that it does not admit to a violation of any provision of the Insurance Code or rule or regulation of the department and First Republic Title Company, LLC maintains the existence of any violation is in dispute.

**Findings of Fact**

1. First Republic Title, LLC holds title agency license no. 1896825, which was issued on February 13, 2014, and is effective until March 1, 2018. Effective March 14, 2016, First Republic Title began doing business as One Nation Title.
2. Prior to doing business as One Nation Title, First Republic Title offered a discount ranging from \$100 to \$200 on escrow and closing costs to military personnel, teachers, nurses, physicians, and first responders, including fire fighters, police, and emergency medical technicians, as well as the hero's immediate family members.
3. After its name change, First Republic Title advertised "One Nation Title Hero's Program" on its new website: [www.onenationtitle.com](http://www.onenationtitle.com), which offered up to a 50% discount on escrow fees at its seven locations. One Nation also distributed a flyer at its seven locations and posted its offer on its Facebook page.

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4. Between December 17, 2014, and January 6, 2017, One Nation Title hero's program provided 81 discounts, which totaled \$14,350.00.

### Conclusions of Law

1. The commissioner has jurisdiction over this matter pursuant to TEX. INS. CODE §§ 82.051-82.055, 84.021-84.022, and 2502.051; and TEX. GOV'T CODE §§ 2001.051-2001.178.
2. The commissioner has the authority to dispose of this case informally pursuant to the provisions of TEX. GOV'T CODE § 2001.056, TEX. INS. CODE §§ 82.055 and 36.104, and 28 TEX. ADMIN. CODE § 1.47.
3. First Republic Title violated TEX. INS. CODE § 2502.051, which prohibits a commission, rebate, discount, portion of a title insurance premium, or other thing of value from being directly or indirectly paid, allowed, or permitted by a person engaged in the business of insurance or received or accepted by a person for engaging in the business of title insurance or for soliciting or referring title insurance.

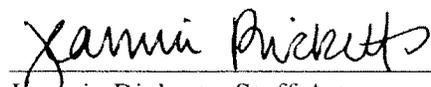
### Order

The commissioner orders First Republic Title, LLC to pay an administrative penalty of \$15,000. The penalty must be paid in full on or before 30 days from the entry of this Order. The administrative penalty must be paid by cashier's check or money order made payable to the "State of Texas" and transmitted to the Texas Department of Insurance, Attn: Enforcement Section, Division 40111, MC 9999, P.O. Box 149104, Austin, Texas 78714-9104.



David Mattax, Commissioner of Insurance  
~~By Kevin Brady, Deputy Commissioner~~  
~~Delegation Order 4506~~

For the Staff:



Jeannie Ricketts, Staff Attorney  
Compliance Division, Enforcement Section  
Texas Department of Insurance

