

No. **2024-8939**

**Official Order  
of the  
Texas Commissioner of Insurance**

**Date: 11/04/2024**

**Subject Considered:**

Gooding Title Company  
228 N Walnut St.  
Clarksville, Texas 75426

Consent Order  
TDI Enforcement File No. 34121

**General remarks and official action taken:**

This is a consent order with Gooding Title Company (Gooding). The Texas Department of Insurance (TDI) alleges that Gooding failed to timely submit its 2022 statistical report and its 2023 annual trust fund account audit report. Gooding has agreed to pay a \$7,500 administrative penalty for this violation.

**Waiver**

Gooding acknowledges that the Texas Insurance Code and other applicable law provide certain rights. Gooding waives all of these rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

**Findings of Fact**

1. Gooding, firm identification number 91794, holds a title agency insurance license issued by TDI.
2. On June 29, 2023, TDI issued Bulletin No. B-0007-23 to Texas title insurance agents regarding the 2022 Title Insurance Agent Data Call for the calendar year ending December 31, 2022. The bulletin required a response by August 21, 2023.

# 2024-8939

Commissioner's Order  
Gooding Title Company  
Page 2 of 4

3. Gooding did not submit its statistical report by August 21, 2023.
4. On October 3, 2023, and October 19, 2023, TDI requested Gooding's statistical report. Gooding did not respond.
5. TDI received Gooding's statistical report on July 8, 2024, which was 322 days late.
6. TDI requires title agencies to file an annual trust fund account audit report prepared by a certified public accountant. The report is due before the 91st day after the end of the agency's fiscal year.
7. Gooding's fiscal year ends on December 31 each year.
8. Gooding did not timely submit its annual trust fund account audit report for 2023, which was due March 31, 2024.
9. On April 17, 2024, May 20, 2024, and June 17, 2024, TDI sent warning letters to Gooding advising it that the violation could result in disciplinary action and the imposition of sanctions pursuant to TEX. INS. CODE §§ 82.051–82.055, 84.021, and 84.022.
10. TDI received Gooding's audit report on July 18, 2024, which was 109 days late.

## Conclusions of Law

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 2551.001, 2551.003, 2651.151–2651.157, 2651.301, and 2703.153; and TEX. GOV'T CODE § 2001.051–2001.178.
2. The commissioner has the authority to informally dispose of this matter as set forth in TEX. GOV'T CODE § 2001.056; TEX. INS. CODE §§ 36.104 and 82.055; and 28 TEX. ADMIN. CODE § 1.47.
3. Gooding has knowingly and voluntarily waived all procedural rights to which it may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intention to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, rehearing by the commissioner, and judicial review.

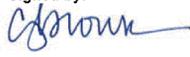
# 2024-8939

Commissioner's Order  
Gooding Title Company  
Page 3 of 4

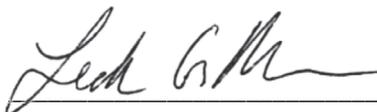
4. Gooding violated TEX. INS. CODE § 2651.151-2651.157 by failing to timely submit its 2023 annual trust fund account audit report.
5. Gooding violated TEX. INS. CODE § 2703.153 by failing to timely submit its 2022 statistical report.

## Order

It is ordered that Gooding Title Company pay an administrative penalty of \$7,500 within 30 days from the date of this order. The administrative penalty must be paid as instructed in the invoice, which TDI will send after entry of this order.

Signed by:  
  
FC5D7EDDFFB4F8... \_\_\_\_\_  
Cassie Brown  
Commissioner of Insurance

Recommended and reviewed by:

  
\_\_\_\_\_  
Leah Gillum, Deputy Commissioner  
Fraud and Enforcement Division

  
\_\_\_\_\_  
Whitney Fraser, Director  
Enforcement

**Affidavit**

STATE OF Texas §

COUNTY OF Red River §

Before me, the undersigned authority, personally appeared Alan E. Gooding who being by me duly sworn, deposed as follows:

"My name is Alan E. Gooding. I am of sound mind, capable of making this statement, and have personal knowledge of these facts which are true and correct.

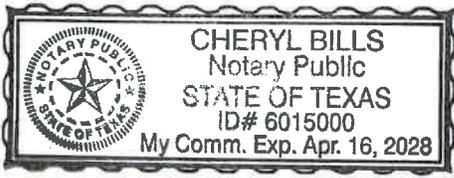
I hold the office of President and am the authorized representative of Gooding Title Company. I am duly authorized by said organization to execute this statement.

Gooding Title Company has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

[Signature]  
Affiant

SWORN TO AND SUBSCRIBED before me on October 11, 2024.

(NOTARY SEAL)



[Signature]  
Signature of Notary Public

Cheryl Bills  
Printed Name of Notary Public