

No. **2025-9359**

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

**Date: 6/18/2025**

**Subject Considered:**

Elite Title & Escrow LLC  
4388 W. Vickery Blvd., Ste. 201  
Fort Worth, Texas 76107

Consent Order  
TDI Enforcement File No. 36280

**General remarks and official action taken:**

This is a consent order with Elite Title & Escrow LLC (Elite Title). The Texas Department of Insurance (TDI) conducted a compliance audit and discovered violations of the Texas Insurance Code and Texas Administrative Code. Elite Title has agreed to pay an administrative penalty of \$12,000.

**Waiver**

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

**Findings of Fact**

**Background and Licensure**

1. Elite Title, firm identification number 210988, holds a title agency license issued by TDI on February 6, 2024.

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2. TDI conducted a comprehensive compliance audit of Elite Title as of September 24, 2024.

### Lack of Escrow Officer Appointment

3. Elite Title failed to timely submit an Escrow Officer Appointment form (FINT09) to appoint a licensed escrow officer acting on the agency's behalf in June and July of 2024.
4. Elite Title later submitted the FINT09 to TDI to appoint this escrow officer on September 12, 2024.

### Late Quarterly Tax Reports

5. Elite Title failed to timely submit its Title Agent Certification of Agent's Quarterly Tax Reports (Form T-S5) for the first and second quarters of 2024. Each of these reports was due not later than 45 days after the end of each quarter, but the reports were not submitted until September 2024.

### Minimum Escrow Accounting Procedures and Internal Controls

6. TDI randomly sampled guaranty files for compliance, including three files for comprehensive review and four files for directly-issued policies.
7. In two files reviewed, Elite Title failed to show item descriptions correctly.
8. In one file reviewed, Elite Title incorrectly listed a receipt type.
9. In two files reviewed, Elite Title failed to maintain documentation to support amounts disbursed for courier fees and commissions.
10. In one file reviewed, Elite Title issued an electronic check from its escrow account and failed to maintain copies of the front and back images of the canceled check.

### Guaranty File Errors

11. In two files reviewed, Elite Title failed to ensure that the name of the disbursement payee for the policy guaranty fee matched the name shown on the settlement statement.

**Conclusions of Law**

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 2602.103, 2651.051, and 2651.301; and 28 TEX. ADMIN. CODE § 9.1, which adopts the *Texas Title Insurance Basic Manual* (“Basic Manual”).
2. The commissioner has the authority to informally dispose of this matter as set forth in TEX. GOV'T CODE § 2001.056, and TEX. INS. CODE §§ 36.104 and 82.055.
3. Elite Title 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.
4. Elite Title violated TEX. INS. CODE § 2652.001 and Administrative Rule L-2(III)(A)(2) of the Basic Manual, Section VI, by failing to timely submit the FINT09 to TDI appointing a licensed escrow officer before the escrow officer acted in that capacity.
5. Elite Title violated Rule S.5 of the Basic Manual, Section VI, by failing to timely file multiple T-S5 Forms, the Title Agency Certification of Agent's Quarterly Tax Report.
6. Elite Title violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 15 of the Basic Manual, Section V, by failing to maintain a complete, current disbursement sheet which lists the date, source, and type of all receipts in each guaranty file.
7. Elite Title violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 16 of the Basic Manual, Section V, by failing to maintain substantiating invoices or sufficient evidence to support all disbursements in all guaranty files.
8. Elite Title violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 20 of the Basic Manual, Section V, by failing to maintain the front and back images of canceled checks in all guaranty files.

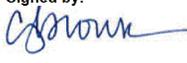
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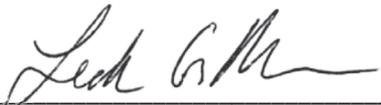
9. Elite Title violated TEX. INS. CODE § 2702.053 by failing to have the name of the disbursement payee for the policy guaranty fee match the name shown on the settlement statement.

## Order

It is ordered that Elite Title & Escrow LLC pay an administrative penalty of \$12,000 within 30 days from the date of this order. The administrative penalty must be paid as instructed in the invoice, which the department will send after entry of this order.

Signed by:  
  
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Cassie Brown  
Commissioner of Insurance

Recommended and reviewed by:

  
Leah Gillum, Deputy Commissioner  
Fraud and Enforcement Division

  
Kaycee Crisp, Staff Attorney  
Enforcement

**Affidavit**

STATE OF Texas §

COUNTY OF Tarrant §

Before me, the undersigned authority, personally appeared Kyle Farville, who being by me duly sworn, deposed as follows:

"My name is Kyle Farville. 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 Manager and am the authorized representative of Elite Title & Escrow LLC. I am duly authorized by said organization to execute this statement.

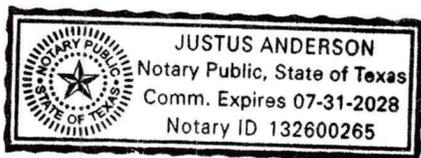
Elite Title & Escrow LLC has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

[Handwritten Signature]

Affiant

SWORN TO AND SUBSCRIBED before me on June 6, 2025.

(NOTARY SEAL)



[Handwritten Signature]  
Signature of Notary Public

Justus Anderson  
Printed Name of Notary Public