

No. **2025-9547**

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

**Date: 10/13/2025**

**Subject Considered:**

PDH Title Services LLC  
1415 Louisiana St. FL 22  
Houston, Texas 77002-7344

Consent Order  
TDI Enforcement File No. 34654

**General remarks and official action taken:**

This is a consent order with PDH Title Services LLC (PDH). The Texas Department of Insurance (TDI) conducted a compliance audit of PDH and discovered violations of the Texas Insurance Code and Texas Administrative Code. PDH has agreed to pay a \$15,000 administrative penalty.

**Waiver**

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

**Findings of Fact**

**Background and Licensure**

1. PDH, firm identification number 177368, held a title agency license issued by TDI on February 11, 2021, which expired on March 1, 2023, when PDH failed to renew the license. TDI issued PDH a new title agency license effective July 26, 2023.

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2. TDI conducted a comprehensive compliance audit of PDH as of March 18, 2024.

### Unauthorized Business of Title Insurance

3. Between March 1, 2023, and July 25, 2023, PDH conducted the business of title insurance without the required license.
4. During PDH's license lapse, TDI found that without holding a license, PDH:
  - a. closed two files during the 90-day period in which PDH could have renewed its license, but did not; and
  - b. received earnest money on July 12 and 20, 2023, for two closings that occurred after PDH received its new title agent license.
5. PDH represents the license lapse was an oversight, and that upon discovering the lapse, PDH took immediate action to quickly file the appropriate paperwork for a new license on July 18, 2023.

### Unappointed Person Performing the Duties of an Escrow Officer

6. Comprehensive audit procedures were performed on three selected guaranty files, and two other guaranty files were randomly selected and reviewed for specific terms.
7. All five settlement statements reviewed were signed by an escrow officer who was not an appointed escrow officer for PDH.
8. PDH appointed this escrow officer after the audit, on October 24, 2024.

### Failure to Timely File Certification of Quarterly Tax Report

9. PDH failed to timely file its Form T-S5 (Title Agent Certification of Agent's Quarterly Tax Report) for the fourth quarter of 2023. PDH later submitted this form on March 7, 2024.

Minimum Escrow Accounting Procedures and Internal Controls

10. TDI reviewed all escrow deposit tickets that cleared during the audit period, a total of two tickets.
11. Both tickets did not display the words "escrow account" or "trust account."
12. Both tickets did not display the related guaranty file directly on the document.

Guaranty File Errors

13. In one of the three files comprehensively reviewed, the invoice or other sufficient evidence for the homeowner's association certificate did not agree with the amount disbursed.
14. In one of the three files comprehensively reviewed, there was no invoice or sufficient other evidence to support the realtor commission.
15. In four files, PDH improperly used a non-promulgated form (ALTA Settlement Statement) to close a title insurance transaction.
16. In two files, PDH failed to disclose a premium split for title services on the settlement statement.
17. In one file, PDH failed to complete a Form T-00 (Verification of Services Rendered) and have it signed by all parties.
18. In one file, PDH failed to disclose all parties receiving a portion of the real estate commission on the settlement statement.

PDH's Post-Audit Mitigative Efforts

19. PDH represents that it has taken measures to address issues identified during the TDI audit including implementing new procedures to regularly review license expirations and renewals; using a shared compliance calendar to allow PDH's management team to monitor regulatory filings and compliance deadlines; and performing post-closing reviews of guaranty files to ensure all necessary documents are retained within the electronic file.

## 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. PDH 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. PDH violated TEX. INS. CODE §§ 101.102(a) and 2651.001, by engaging in the business of title insurance, as that term is defined in TEX. INS. CODE §§ 101.051 and 2501.005, while it did not have a title agent license between March and July 2023.
5. PDH violated TEX. INS. CODE § 2652.1511(b) and Administrative Rule L-2(III)(A)(2) of the Basic Manual, Section VI, by failing to appoint its escrow officer before the escrow officer acted in that capacity.
6. PDH violated Administrative Rule S.5 of the Basic Manual, Section VI, by failing to timely submit its Form T-S5.
7. PDH violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 9 of the Basic Manual, Section V, by failing to display the words “escrow account” or “trust account” on the escrow deposit ticket.
8. PDH violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 14 of the Basic Manual, Section V, by failing to display the related guaranty file directly on escrow deposit tickets.
9. PDH violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 16 of the Basic Manual, Section V, by failing to maintain an invoice or sufficient evidence to substantiate or support all disbursements in the guaranty files.

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10. PDH violated TEX. INS. CODE § 2702.053 by using a non-promulgated form to close a title insurance transaction and failing to disclose all parties receiving a portion of the real estate commission in the settlement statement.
11. PDH violated TEX. INS. CODE § 2502.052 by failing to disclose a premium split for title services on a settlement statement.
12. PDH violated Procedural Rule P-22(F) of the Basic Manual, Section IV, by failing to complete and have all parties sign Form T-00 (Verification of Services Rendered).

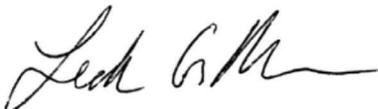
## Order

It is ordered that PDH Title Services LLC pay an administrative penalty of \$15,000 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:



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Leah Gillum, Deputy Commissioner  
Fraud and Enforcement Division



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Kaycee Crisp, Staff Attorney  
Enforcement

**Affidavit**

STATE OF Texas §  
§  
COUNTY OF Harris §

Before me, the undersigned authority, personally appeared Lew Cary Russell  
who being by me duly sworn, deposed as follows:

"My name is Lew Cary Russell. 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 Member and am the authorized representative of PDH Title Services LLC. I am duly authorized by said organization to execute this statement.

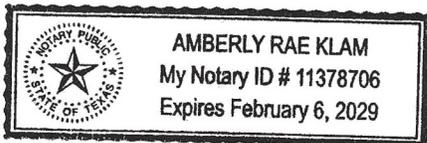
PDH Title Services LLC has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

*Lew Cary Russell*

\_\_\_\_\_  
Affiant

SWORN TO AND SUBSCRIBED before me on September 17, 2025.

(NOTARY SEAL)



*Amberly Rae Klam*  
\_\_\_\_\_  
Signature of Notary Public

Amberly Rae Klam  
Printed Name of Notary Public