

No. **2025-9613**

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

**Date: 11/20/2025**

**Subject Considered:**

Big Bend Title, LLC  
PO Box 813  
Fort Davis, Texas 79734-0813

Consent Order  
TDI Enforcement File No. 37295

**General remarks and official action taken:**

This is a consent order with Big Bend Title, LLC (Big Bend Title). The Texas Department of Insurance (TDI) conducted a compliance audit and discovered violations of the Texas Insurance Code and Texas Administrative Code. Big Bend Title has agreed to pay an administrative penalty of \$8,000.

**Waiver**

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

**Findings of Fact**

1. Big Bend Title, firm identification number 92251, holds a title agency license issued by TDI on December 18, 2013.
2. TDI conducted a comprehensive compliance audit of Big Bend Title's activity through March 17, 2025, and found several violations.

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## Unappointed Person Performing Duties of an Escrow Officer

3. TDI found that Big Bend Title permitted a licensed escrow officer to act as an escrow officer without being properly appointed. Staff identified at least 12 files where the individual performed the duties of an escrow officer prior to appointment.
4. Big Bend Title subsequently submitted Form FINT09 for the individual's appointment.

## Failure to Timely Submit Quarterly Tax Reports

5. TDI found that Big Bend Title failed to timely submit quarterly tax withholding reports for all quarters of 2023 and 2024.
6. Big Bend Title subsequently submitted Form T-S5 for all missed quarters on March 4, 2025, and purports procedures are in place to ensure that future reports are submitted in a timely manner.

## Improper Completion of Disbursement Sheet

7. TDI found one file with a disbursement sheet that was prepared incorrectly.
8. Big Bend Title subsequently purported that it reviewed the necessity of accurately posting receipts and other data with employees, and that random reviews would be conducted to ensure accuracy.

## Failure to Identify All Parties Receiving Commission on Settlement Statement

9. TDI found one file where the settlement statement where all parties receiving a portion of the real estate commission were not disclosed.
10. Big Bend Title subsequently purported that it reviewed the necessity of accurately reporting disbursed funds, and that random reviews would be conducted to ensure accuracy.

## Additional Mitigating Factors

11. Big Bend Title has no formal disciplinary history.

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12. Big Bend Title cooperated with TDI auditors and staff, provided detailed responses to the reported findings, and submitted a timely corrective action plan to address the violations indicated in the audit.
13. When reviewing the operating accounts for Big Bend Title, TDI Staff identified no problems related to, or having an impact upon, escrow funds.

## 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, 2551.056, 4001.002, 4005.102–4005.104; TEX. GOVT. CODE § 2001.051–2001.178; and 28 TEX. ADMIN. CODE § 9.1, which adopts the *Title Insurance Basic Manual* (Basic Title 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. Big Bend 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. Big Bend Title violated TEX. INS. CODE § 2652.1511, 28 TEX. ADMIN. CODE § 9.1, and Administrative Rule L-2(III)(A)(2) of the Basic Title Manual, by failing to timely submit the FINT09 to TDI appointing a licensed escrow officer before the escrow officer acted on behalf of Big Bend Title.
5. Big Bend Title violated TEX. INS. CODE § 2651.011, 28 TEX. ADMIN. CODE § 9.1, and Administrative Rule S-5 of the Basic Title Manual, by failing to timely submit Form T-S5, evidencing IRS filings for quarterly tax withholding.
6. Big Bend Title violated 28 TEX. ADMIN. CODE § 9.1 and the Basic Title Manual, Section V, Requirement 15 for Minimum Escrow Accounting Procedures and Internal Controls, by incorrectly completing a disbursement sheet that failed to sufficiently provide support for all disbursements.

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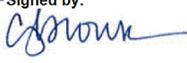
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7. Big Bend Title violated TEX. INS. CODE § 2702.053, and TDI Title Bulletin Number 160, by failing to disclose all parties receiving a portion of the real estate commission on the settlement statement.

## Order

It is ordered that Big Bend Title, LLC pay an administrative penalty of \$8,000 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



Nancy Williams, Staff Attorney  
Enforcement

**Affidavit**

**STATE OF** TEXAS §  
§  
**COUNTY OF** JEFF DAVIS §

Before me, the undersigned authority, personally appeared Lynne C. Baldwin, who being by me duly sworn, deposed as follows:

"My name is Lynne C. Baldwin. 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 Big Bend Title, LLC. I am duly authorized by said organization to execute this statement.

Big Bend Title, 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."

*Lynne C. Baldwin*  
Affiant Lynne C. Baldwin, President

SWORN TO AND SUBSCRIBED before me on 7 OCTOBER, 2025.

(NOTARY SEAL)



*Star S. Smith*

Signature of Notary Public

STAR S. SMITH

Printed Name of Notary Public