

No. **2026-10112**

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

Date: 09/11/2026

Subject Considered:

True Concept Title, Inc.
Dba TC Escrow, Inc.
4132 Interstate 30 W Ste 6
Caddo Mills, TX 75135

Consent Order
TDI Enforcement File No. 38269

General remarks and official action taken:

This is a consent order with True Concept Title, Inc., dba TC Escrow, Inc. (True Concept). The Texas Department of Insurance (TDI) conducted a compliance audit and discovered violations of the Texas Insurance Code and Texas Administrative Code. True Concept has agreed to pay an administrative penalty of \$25,000.

Waiver

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

Findings of Fact

1. True Concept, firm identification number 114257, holds a title agency license with an underwriter qualification issued by TDI on December 17, 2015.
2. TDI conducted a comprehensive compliance audit of True Concept as of August 13, 2025, pursuant to TEX. INS. CODE § 2602.103.

Associated Title Agency

3. TrustPro Title & Escrow, Inc. (TrustPro), firm identification number 225075, holds a title agency license with an underwriter qualification issued by TDI on April 22, 2025.
4. TrustPro is associated with True Concept. Both title agencies have the same designated on-site manager, Mark Clements. Both title agencies had the same business address until April 28, 2026, when True Concept changed its address with TDI.
5. TrustPro was a title agency based in Florida prior to obtaining a title agency license in Texas.
6. TrustPro did not hold a title agency license with TDI at the time of the True Concept audit.

Unauthorized Business of Insurance

7. A person engages in the business of title insurance if the person:
 - a. As insurer, guarantor, or surety, makes or proposes to make a contract or policy of title insurance or its equivalent;
 - b. Transacts or proposes to transact any phase of title insurance, including;
 - i. Soliciting;
 - ii. Title examination other than an examination conducted by an attorney;
 - iii. Closing the transaction than a closing conducted by an attorney;
 - iv. Executing a contract of title insurance; and
 - v. Insurance and transacting matters arising out of the contract after the contract is executed, including reinsurance; or
 - c. Makes a guaranty or warranty of title search or a title examination, or any component of a title search or title examination, if the person is not the person who performs the search or examination;
 - d. engages in or proposes to engage in any business that is substantially equivalent to the business of title insurance as described by TEX. INC. CODE

§ 2501.005, regardless of whether that conduct is performed in a manner designed to evade the provisions of Title 11 of the Texas Insurance Code.

8. During the audit, TDI reviewed three closing transactions. Evidence found in bank statements, guaranty files, and emails indicated that TrustPro, an unlicensed agency, was involved in the coordination and completion of closing all three transactions, which constitutes the unauthorized business of title insurance.

Escrow Officer Licensing and Appointment

9. An individual may not act as an escrow officer unless the individual is licensed, covered by a surety bond or deposit as required, and appointed as an escrow officer by the title agent or direction operation.
10. The audit revealed that settlement statements were signed by employees that were not licensed escrow officers.
11. The audit revealed that the electronic signature of True Concept's escrow officer was applied to escrow checks by an unlicensed affiliate TrustPro employee located in Florida.

Policy Guaranty Fees

12. Title insurance agents are required to collect and remit a guaranty fee for each owner policy and loan policy issued by the agency.
13. True Concept's first quarter of 2025 policy guaranty fee was due on May 1, 2025, and was not remitted until May 29, 2025.
14. True Concept did not timely submit policy guaranty fees for the first quarter of 2025.

Failure to Maintain Separate and Distinct Accounting for Policy Guaranty Fees

15. Title insurance agents are required to maintain separate and distinct accounting of escrow funds, including an escrow bank account or accounts separate and apart from all other accounts. Title insurance agents must deposit all policy guaranty fees into an audited escrow or trust account.

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16. True Concept was improperly comingling policy guaranty fees with operating funds. Collected fees were deposited directly into and remitted from the operating account rather than the escrow account.

Failure to Timely Submit Annual Escrow Audit Report

17. Title agents are required to provide annual escrow audit reports of trust fund accounts prepared by an independent certified public accountant not later than the 90th day after the date of the end of the title insurance company's fiscal year.
18. True Concept failed to timely submit an annual audit of trust fund accounts for the fiscal year ending December 31, 2023, due by March 31, 2024.
19. True Concept failed to timely submit an annual audit of trust fund accounts for the fiscal year ending December 31, 2024, due by March 31, 2025.
20. True Concept failed to timely submit an annual audit of trust fund accounts for the fiscal year ending December 31, 2025, due by March 31, 2026.
21. True Concept submitted its 2023 annual escrow audit report on April 17, 2024, 17 days late. True Concept submitted its 2024 annual escrow audit report on May 14, 2025, 44 days late. True Concept submitted its 2025 annual escrow audit report on May 19, 2026, 49 days late.

Failure to Timely Submit Quarterly Tax Reports

22. Title agents are required to file with TDI the Title Agent Certification of Agent's Quarterly Tax Reports (Form T-S5). Form T-S5 must be submitted to TDI no later than 45 days after the end of the quarter.
23. True Concept failed to timely submit its Form T-S5 for the fourth quarter of 2024 and the first quarter of 2025.
24. True Concept has not submitted its missing Form T-S5 for 2024 as of entry of this order. True Concept submitted its missing Form T-S5 for the first quarter of 2025 on September 4, 2025, 112 days late.

Electronic Signatures

25. An electronically produced form is required to be signed either with an original signature or by a safeguarded electronic signature.
26. The audit revealed that in all guaranty files audited the electronic signatures were being improperly applied to escrow checks because the electronic signatures affixed to the documents were not safeguarded.

Escrow Accounting

27. The audit revealed that escrow funds for Texas title insurance closings were collected by TrustPro, an unlicensed agency, and were later sent to True Concept's escrow account which constitutes improper commingling.
28. TDI staff identified 17 receipts in True Concept's escrow account that were transferred from unlicensed agency, TrustPro.
29. Stale-dated outstanding checks, dating back to 2023, needed to be investigated and cleared.

Minimum Escrow Accounting Procedures and Internal Controls

30. There were multiple violations of the minimum escrow accounting procedures and internal controls:
 - a. The three-way reconciliations for March and April 2025 were not reviewed by management or another employee;
 - b. In all three guaranty files reviewed, item descriptions were not shown on the disbursement sheets;
 - c. In one guaranty file reviewed, the amount disbursed for document preparation did not agree to the invoice;
 - d. An escrow receivable was not cleared within 45 days of the date of the bank statement for the period in which the receivables occurred.

Guaranty Files

31. The following violations and exceptions were found in the audit of guaranty files:
- a. In one file reviewed, the name "Trust Pro Title and Escrow, Inc." was used on the settlement statement instead the licensed agency's name.
 - b. In one file reviewed, the amounts disbursed for closing proceeds, recording fees, title premiums, and endorsements did not agree with the settlement statement;
 - c. In one file reviewed, the disbursement payee for a loan payoff did not agree to the settlement statement;
 - d. In one file reviewed, an unauthorized "update fee" of \$250 was collected in addition to the title insurance premium and escrow fee charged by True Concept;
 - e. In one file reviewed, the anticipated premium split for title services was not disclosed on Schedule D on the commitment;
 - f. In all files reviewed, signed outgoing wire authorizations were not found in the scanned files;
 - g. In one file reviewed, a copy of a receipt item was not found in the scanned file;
 - h. In all files reviewed, the premium split for title services was not disclosed on the Texas Disclosure (Form T-64)
 - i. In one file reviewed, Form T-64 was not signed by the settlement agent;
 - j. In two files reviewed, no evidence was found that prior written authorization was received from the consumer to use a notary service before the transaction was closed

Internal Controls and Procedures Observations

32. True Concept failed to provide its balance sheet which limited TDI's ability to complete this part of the audit as required under Tex. Ins. Code § 2602.103 and Administrative Rule G.2.

Conclusions of Law

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 2501.003, 2602.151, 2651.008, 2651.151, 2651.301, 2652.001–2652.002, 2702.053, 2703.153; and 28 TEX. ADMIN. CODE § 9.1, adopting 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. True Concept 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. True Concept engaged in the unauthorized business of title insurance by allowing unlicensed, out-of-state personnel to be involved in the coordination and completion of closing a transaction, and preparation of all title commitments and title policies in violation of TEX. INS. CODE §§ 101.051 and 2501.005(3).
5. True Concept allowed an electronically produced form to be electronically signed without the required safeguarded signature in violation of Procedural Rule P-17.
6. True Concept allowed unlicensed individuals to perform the duties of an escrow officer, in violation of TEX. INS. CODE §§ 2652.001 and 2501.003(4).
7. True Concept did not timely submit policy guaranty fees, in violation of TEX. INS. CODE § 2602.151 and Administrative Rule G.1.
8. True Concept commingled escrow and operating funds, in violation of TEX. INS. CODE § 2651.301(7).

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9. True Concept failed to timely submit quarterly tax reports, in violation of Administrative Rule S.5.
10. True Concept failed to timely submit an annual audit of trust fund accounts, in violation of TEX. INS. CODE § 2651.151
11. True Concept failed to maintain minimum escrow accounting procedures and internal controls, in violation of Section V requirement nos. 3, 15, 16 and 17 of the Basic Manual.
12. True Concept used the name of an unlicensed agency on a settlement statement, in violation of TEX. INS. CODE § 2651.008.
13. True Concept made disbursements that did not agree to settlement statement, in violation of TEX. INS. CODE §2702.053.
14. True Concept collected an unauthorized fee, in violation of Rate Rule R-1.
15. True Concept failed to disclose the anticipated premium split for title services on the commitment, in violation of Procedural Rule P-21.
16. True Concept failed to maintain signed outgoing wire authorizations and a copy of receipt in the scanned files, in violation of Procedural Rule P-32.
17. True Concept failed to disclose the premium split for title services on the Form T-64 and failed to have Form T-64 signed by the settlement agent, in violation of Procedural Rule P-73.
18. True Concept failed to obtain prior written authorization from the consumer to use a notary service before the transaction was closed, in violation of Specific Areas and Procedures Number 5.

Order

It is ordered that True Concept Title, Inc. pay an administrative penalty of \$25,000 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:

Amanda Crawford

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Amanda Crawford
Commissioner of Insurance

Recommended and reviewed by:

Leah Gillum

Leah Gillum, Deputy Commissioner
Fraud and Enforcement Division

Sydney Rosales

Sydney Rosales, Staff Attorney
Enforcement

Affidavit

STATE OF Florida §

COUNTY OF Pinellas §

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

"My name is Adam Crockett. 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
True Concept Title, Inc. I am duly authorized by said organization to execute this
statement.

True Concept Title, Inc. 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 August 18, 2026.

(NOTARY SEAL)



SARA WILSON
Commission # HH 763324
Expires March 3, 2030

[Signature]

Signature of Notary Public

Sara Wilson

Printed Name of Notary Public