

No. **2026-9773**

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

**Date: 01/29/2026**

**Subject Considered:**

Del Sol Title Company, LLC  
Mammoth Rock Title LLC  
10657 Vista Del Sol Dr Ste E  
El Paso, Texas 79935-4504

Mammoth Rock Capital LLC  
12020 Rojas Drive  
El Paso, Texas 79936-7711

Consent Order  
TDI Enforcement File Nos. 33980, 34139, and 34140

**General remarks and official action taken:**

This is a consent order with licensed title agent Del Sol Title Company, LLC (Del Sol), applicant Mammoth Rock Title, LLC (MR Title), and its owner, Mammoth Rock Capital LLC (MR Capital). Texas Department of Insurance (TDI) conducted a title agent compliance audit of Del Sol and discovered violations of the Texas Insurance Code and Texas Administrative Code. During the period of the audit, Del Sol was acquired by MR Title, and TDI discovered that both MR Title and MR Capital engaged in insurance acts without holding licenses. MR Title has submitted a title agent license application. This order grants a title agent license to MR Title, orders MR Capital to cease and desist certain conduct, and requires Del Sol, MR Title, and MR Capital to jointly and severally pay an administrative penalty of \$130,000.

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## Waiver

Del Sol, MR Title, and MR Capital acknowledge that the Texas Insurance Code and other applicable law provide certain rights. Del Sol, MR Title, and MR Capital waive 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. Del Sol, firm identification number 146103, holds a title insurance agent license issued by TDI on July 31, 2018.
2. TDI conducted a comprehensive compliance audit of Del Sol as of November 7, 2024, and on February 26, 2025, sent Del Sol the report on the audit findings. On March 11, 2025, Del Sol sent TDI its response to the report.

### Failure to Timely Cancel Escrow Officer Appointments

3. Del Sol failed to timely file with TDI an Escrow Officer Appointment form (FINT09) to cancel an escrow officer's appointment. Del Sol filed the FINT09 on October 29, 2024, nearly two months after this escrow officer's separation.
4. After the audit, TDI also found that Del Sol again failed to timely file two FINT09 forms to cancel two escrow officers' appointments. Del Sol filed these FINT09 forms on or about February 27, 2025, nearly three months and two months after these other escrow officers separated, respectively.

### Late Filed Unencumbered Assets Certification Report

5. Texas law requires title agents to file the Title Agent's Unencumbered Assets Certification (Form T-S1) annually to TDI between September 1 and September 30 of each year.
6. Del Sol failed to timely file its Form T-S1 in September 2024. Del Sol filed the report on October 16, 2024, over two weeks late.

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### Failure to Timely File Quarterly Tax Reports

7. Texas law requires title agents to provide TDI on a quarterly basis with a copy of its quarterly withholding tax report or its equivalent and proof of payment of the tax, no later than 45 days after the end of the quarter.
8. Del Sol failed to timely file its Title Agent Certification of Agent's Quarterly Tax Report (Form T-S5) for the first quarter of 2023, and fourth quarter of 2024. Del Sol filed each of them a month late, on June 22, 2023, and March 18, 2025, respectively.

### Escrow Accounting Errors

9. Comprehensive audit procedures were performed on Del Sol's escrow accounting records for July and August 2024 for two bank accounts. Balances from 30 guaranty files were reviewed to verify amounts shown on the August escrow trial balance. The guaranty file balances were correct.
10. However, the August escrow trial balance for the first bank account contained "dummy" files used to accumulate fees owed to the tax certificate company, attorney, and courier company. The funds were added to the "dummy" file, but did not disburse until later. Because the funds did not retain the characteristic of escrow funds after closing, this procedure resulted in commingling of escrow and operating funds, and also resulted in all three parts of the three-way reconciliation to be misstated.
11. The July and August 2024 deposits-in-transit list for the same bank account included an invalid deposit for an incoming wire amount booked in May 2024 to an incorrect guaranty file, and transferred on the same day to the correct guaranty file. A duplicate deposit was booked to the correct guaranty file on the same day in May 2024, but was not voided in the system until October 2024. All three parts of the three-way reconciliation were incorrect.

### Minimum Escrow Accounting Procedures and Internal Controls

12. Del Sol failed to properly style its second bank account as an "escrow account" or "trust account."
13. In one of the guaranty files reviewed, the amount shown on an invoice for recording fees did not match the actual disbursement.

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### Guaranty File Errors

14. TDI randomly sampled Del Sol's guaranty files for compliance, including 15 files for comprehensive review and two files that were over three years old.
15. In one file, the amount disbursed did not match what was shown on and authorized by the settlement statement.
16. In five files, the payees for disbursements related to document preparation, tax certifications, courier fees, surveys, and owner and lien reports, did not match the names of the payees shown on the settlement statement.
17. In two files, Del Sol failed to disclose the premium split for title services on the settlement statement.
18. In one file, Del Sol charged an unauthorized fee for an owner and lien report – incorrectly labeled by Del Sol as an "O & E Policy" - and which was invoiced as an "Owner & Lien Search" payable to the title agent who had furnished title evidence and examination, and who received a premium split for those services.
19. In all 15 files comprehensively reviewed, Del Sol failed to:
  - a. place Del Sol's correct ownership information on Scheduled D of the title commitment; and
  - b. correctly complete a Verification of Services Rendered (Form T-00).

### Del Sol's Change in Operations and MR Title's Unlicensed Acts

20. TDI's compliance audit of Del Sol found that Del Sol was using MR Title's name in executed settlement statements and invoices.
21. According to TDI's records, MR Title holds no insurance license or other authorization to engage in the business of insurance in Texas, and MR Title is not exempt or excepted from licensure or authorization to engage in the business of insurance.
22. TDI's investigation found that MR Title was formed in Texas in May 2023, and that it purchased Del Sol on or about December 14, 2023. However, Del Sol failed to

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notify TDI of the acquisition and its change in operations by filing a Title Insurance Agency or Direct Operation Change Request form (FINT129).

23. In addition, in January 2024, a Texas resident complained to TDI about a realtor workshop sponsored by "Mammoth Rock Title, formally known as Del Sol Title Insurance." TDI's investigation of this complaint found that MR Title was soliciting and advertising title insurance and acting as a title agent without holding the appropriate license.
24. On February 2, 2024, Del Sol filed a Certificate of Amendment with the Texas Secretary of State identifying MR Title as the sole managing member of Del Sol. A week later, Del Sol filed an assumed name certificate with the Texas Secretary of State to use the name "Mammoth Rock Title," but did not notify TDI.
25. Soon after, Del Sol began to advertise and hold itself out as MR Title on its own website, [www.delsoltitle.com](http://www.delsoltitle.com).
26. On February 22, 2024, TDI informed Del Sol and MR Title of TDI's concerns with MR Title's unlicensed insurance activities and Del Sol's website.
27. On the same day, Del Sol submitted a FINT129 to TDI, requesting to use the assumed name "Mammoth Rock Title."
28. On April 10, 2024, TDI notified Del Sol that its FINT129 was deficient and could not be processed because MR Title is a separate legal entity, requiring a separate title agent license.
29. By mid-May 2024, Del Sol had revised its website to remove all content, except a statement directing its customers to contact MR Title, and a link to MR Title's own website, [www.mammothrocktitle.com](http://www.mammothrocktitle.com).
30. MR Title's website advertised and solicited title insurance to Texas residents, including misrepresenting that it then worked with three named title insurance companies. Although Del Sol holds active appointments with those insurers, MR Title holds no such appointments or authority to act on behalf of any title insurance company.
31. Eight months after MR Title's acquisition of Del Sol, on or about August 21, 2024, Del Sol submitted another FINT129 form to TDI, notifying TDI of an acquisition, but

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incorrectly identified its direct owner as the parent company of MR Title - MR Capital. TDI did not process this submission and notified Del Sol of the deficiency.

32. Finally, nearly a full year after the acquisition, on or about November 15, 2024, Del Sol submitted a FINT129 form to properly notify TDI and correctly identify MR Title as Del Sol's new owner. TDI processed this submission.
33. Three months later, in February 2025, MR Title then removed its website from public view.

### MR Capital's Unlicensed Acts

34. The records of the Texas Secretary of State show that MR Capital was formed in Texas in November 2021.
35. Sometime before February 2024, MR Capital began to advertise and solicit insurance quotes from Texas residents on a website it operated under the name "Mammoth Rock Insurance" without holding any insurance license. MR Capital's website advertised and solicited multiple lines of insurance business, specifically automobile, homeowners, renters, and life insurance business.
36. According to TDI's records, MR Capital holds no insurance license or other authorization to engage in the business of insurance in Texas, and is not exempt or excepted from licensure or authorization to engage in the business of insurance.
37. TDI notified MR Capital that it was not licensed to operate its website on February 22, 2024. MR Capital represents that it removed the website and ceased soliciting insurance business through its website on August 22, 2024.

### MR Title's License Application and Continued Unlicensed Acts and Advertising

38. On July 29, 2024, MR Title submitted to TDI an incomplete title agent license application, identification number 3333885. In the application, MR Title represents that its sole owner is MR Capital.
39. Soon after submission of the application, on August 14, 2024, the sole managing manager of MR Title paid \$5,000 to run an advertisement for MR Title in a local El Paso magazine, knowing that MR Title was not licensed at that time.

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40. In October 2024, a full-page advertisement appeared in an El Paso magazine and misrepresented that MR Title was voted "The 2024 Fifth Best Title Company of El Paso." The advertisement did not name or include any reference to Del Sol.
41. Meanwhile, over the course of a year following the submission of MR Title's license application, TDI corresponded with MR Title about numerous deficiencies in the application and in June 2025, MR Title submitted the remaining information necessary to complete the application.
42. On July 21, 2025, TDI proposed to deny MR Title's license application. After discussion with TDI, MR Title appealed that decision and made a written request for a hearing.
43. MR Title's license application is being resolved through this consent order.

### Subsequent Events

44. Del Sol represents that it implemented the following since TDI's audit:
  - a. coordination procedures with human resources to ensure that FINT09 forms are immediately filed with TDI;
  - b. a compliance calendar to make sure quarterly and annual reports are timely filed with TDI; and
  - c. it has ceased using "dummy files."
45. Del Sol represents that during TDI's investigation, its former managing member, Hector Philips, individual identification number 1866234, failed to fully share TDI's compliance concerns with all Del Sol management and Del Sol erroneously left him as Del Sol's designated contact in TDI's records after he separated effective May 31, 2023.
46. Del Sol represents that from January 2024 until March 7, 2025, it also erroneously relied on its former CEO, Matthew Vincent Phillips, individual identification number 1975127, to communicate TDI's compliance concerns to management and were misled into believing they could advertise as MR Title.
47. In November 2025, Del Sol provided TDI with a copy of its bank statement from August 2025 showing that its escrow account is now styled to include the word "escrow."

**Conclusions of Law**

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 101.001 *et seq.*, 2501.005, 2551.001–2551.003, 2602.103, 2651.001, and 2651.301; 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. Del Sol, MR Title, and MR Capital have knowingly and voluntarily waived all procedural rights to which they 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. Del Sol violated TEX. INS. CODE § 2651.301(7) and Minimum Escrow Accounting Procedures and Internal Controls requirements 1 and 2 of the Basic Manual, Section V, by failing to maintain a separate and distinct accounting of escrow funds.
5. Del Sol violated TEX. INS. CODE § 2702.053 by failing to disclose on the settlement statement:
  - a. items of disbursement that were actually disbursed;
  - b. all parties receiving disbursements; and
  - c. the premium split for the title services.
6. Del Sol violated the Basic Manual, Section VI, Administrative Rule L-1(V)(A)(2) and (B)(1)(d) by failing to notify TDI of changes to its operations by filing a Title Insurance Agency or Direct Operation Change Request form (FINT129) to identify its new owner.
7. Del Sol violated the Basic Manual, Section VI, Administrative Rule L-2(III)(B)(2) by failing to immediately file three Escrow Officer Appointment forms (Form FINT09) with TDI to cancel appointments.

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8. Del Sol violated the Basic Manual, Section VI, Administrative Rule S.1 by failing to timely file its annual Title Agent's Unencumbered Assets Certification Report for 2024.
9. Del Sol violated the Basic Manual, Section VI, Administrative Rule S.5 by failing to timely file two T-S5 Forms, the Title Agent Certification of Agent's Quarterly Tax Report.
10. Del Sol violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 9 of the Basic Manual, Section V, by failing to style its escrow bank account as an "escrow account" or "trust account."
11. Del Sol violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 16 of the Basic Manual, Section V, by failing to keep invoices substantiating or sufficient evidence to support all disbursements in the guaranty files.
12. Del Sol violated the Basic Manual, Section III, Rate Rule R-1, by making payments of an unauthorized fee to a title agent.
13. Del Sol violated Rule P-21 of the Basic Manual, Section IV, by failing to place correct information on Schedule D of the title commitment.
14. Del Sol violated Rule P-22 of the Basic Manual, Section IV, by failing to correctly complete a Verification of Services Rendered (Form T-00).
15. As contemplated in TEX. INS. CODE § 2651.301(1), MR Title has committed acts that are grounds to deny its license application.
16. MR Title violated TEX. INS. CODE §§ 101.102(a), 2501.005(a)(2) and (b), and 2651.001, by acting as a title insurance agent without holding a title insurance agent license.
17. MR Capital violated TEX. INS. CODE §§ 101.102(a), 4001.051, and 4001.101 by engaging in and directly or indirectly assisting in acts constituting the business of insurance without licensure, as those acts are defined in TEX. INS. CODE §§ 101.051 and 4001.051.
18. Del Sol, MR Title, and MR Capital violated TEX. INS. CODE §§ 541.003 and 541.052 by making, publishing, disseminating, circulating, or placing before the public untrue,

deceptive, or misleading representations or statements in the business of insurance.

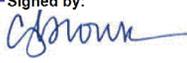
19. MR Title has committed acts that are grounds to deny it a title insurance agency license under TEX. INS. CODE § 2651.301(1) and (5).

**Order**

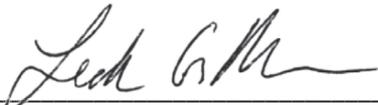
It is ordered that a title insurance agency license is granted to Mammoth Rock Title, LLC.

It is further ordered that Mammoth Rock Capital LLC must cease and desist engaging in any insurance acts, including advertising and soliciting insurance business of any kind.

It is further ordered that Del Sol Title Company, LLC, Mammoth Rock Title LLC, and Mammoth Rock Capital LLC, must jointly and severally pay an administrative penalty of \$130,000 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:  
  
FC5D7EDDFB4F8...  
\_\_\_\_\_  
Cassie Brown  
Commissioner of Insurance

Recommended and reviewed by:

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

  
\_\_\_\_\_  
Anna Kalapach, Staff Attorney  
Enforcement



**Affidavit**

STATE OF Texas §  
§  
COUNTY OF El Paso §

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

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

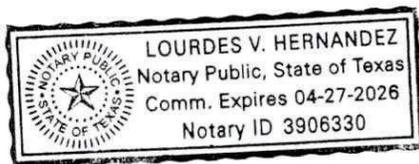
I hold the office of Chairman and am the authorized representative of  
Mammoth Rock Title LLC. I am duly authorized by said organization to execute this  
statement.

Mammoth Rock 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."

[Signature]  
Affiant

SWORN TO AND SUBSCRIBED before me on January 26, 2026

(NOTARY SEAL)



[Signature]  
Signature of Notary Public  
Lourdes V. Hernandez  
Printed Name of Notary Public

**Affidavit**

STATE OF Texas §  
§  
COUNTY OF El Paso §

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

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

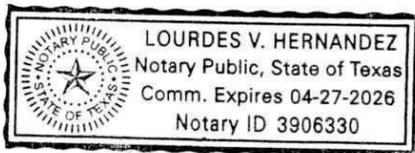
I hold the office of President & CEO and am the authorized representative of  
Mammoth Rock Capital LLC. I am duly authorized by said organization to execute this  
statement.

Mammoth Rock Capital 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."

[Signature]  
Affiant

SWORN TO AND SUBSCRIBED before me on January 26, 2026

(NOTARY SEAL)



[Signature]  
Signature of Notary Public

Lourdes V Hernandez  
Printed Name of Notary Public