

No. **2026-9918**

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

Date: 05/11/2026

Subject Considered:

Stellar Title Group, LLC
121 E. Worth St.
Grapevine, Texas 76051-5316

Consent Order
TDI Enforcement File No. 37110

General remarks and official action taken:

This is a consent order with Stellar Title Group, LLC (Stellar Title) for failing to timely file its: 2023 title insurance agent statistical report; annual trust fund account audit report for its fiscal year ending December 31, 2024; and, four Title Agent Certifications of Agent's Quarterly Tax Reports. Stellar Title also late filed multiple forms to appoint escrow officers it advertised were acting in that capacity, and did not immediately cancel the appointment of an escrow officer that had either ceased acting in that capacity or separated from employment. Stellar Title agrees to pay an administrative penalty of \$13,000.

Waiver

Stellar Title acknowledges that the Texas Insurance Code and other applicable law provide certain rights. Stellar 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. Stellar Title, firm identification number 206507, holds a title insurance agency license issued by the Texas Department of Insurance (TDI) on September 11, 2023.

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Late-Filed 2023 Statistical Report

2. On September 6, 2024, TDI issued Bulletin No. B-0016-24 to Texas title insurance agents regarding the 2023 Title Insurance Agent Data Call for the reporting period of January 1 through December 31, 2023. The bulletin required submission of business data by October 14, 2024, for TDI's use in setting title insurance premium rates.
3. Stellar Title did not submit its statistical report by October 14, 2024, and was listed as a non-reporter in TDI's 2023 Texas Title Insurance Agent Experience Report Compilation.
4. On January 13, 2025, Stellar Title attempted to submit its statistical report, but the submission contained inaccurate information, failed to include an affidavit attesting to the accuracy of the data, and was therefore incomplete.
5. On February 5, 2025, Stellar Title filed its statistical report with TDI, nearly four months late.

Failure to Timely File Annual Trust Fund Account Audit Report

6. The Texas Insurance Code requires title agencies to file with TDI an annual trust fund account audit report prepared by a certified public accountant ("the report").
7. The report is due before the 91st day after the end of the title agency's fiscal year.
8. Stellar Title's fiscal year ended on December 31, 2024.
9. Stellar Title failed to timely file the report by March 31, 2025.
10. TDI received Stellar Title's report on August 22, 2025, 144 days late.

Failure to Timely File Quarterly Tax Reports

11. 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.

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12. Stellar Title failed to timely file its Title Agent Certification for Agent's Quarterly Tax Reports (Form T-S5) for the:
 - a. third quarter of 2024;
 - b. fourth quarter of 2024;
 - c. first quarter of 2025; and,
 - d. fourth quarter of 2025.
13. On June 16, 2025, Stellar Title submitted three T-S5 forms for the third and fourth quarters 2024, and the first quarter of 2025.
14. On February 19, 2026, Stellar Title submitted its T-S5 form for the fourth quarter of 2025.

Failure to Timely Appoint and Immediately Cancel Escrow Officers

15. The Texas Insurance Code requires title agents to appoint an escrow officer before the escrow officer may act in that capacity for the title agent. To appoint the escrow officer, the title agent must submit an Escrow Officer Appointment Form (FINT09) to TDI with the associated fee. Title agents are also required to immediately complete and submit a FINT09 whenever an escrow officer ceases to act as an escrow officer or the escrow officer's employment with the title agent ends, and also provide a copy of the FINT09 to the cancelled escrow officer.
16. Prior to June 17, 2025, Stellar Title advertised on its website that six people were acting in the capacity of escrow officers for Stellar Title, when none of those individuals were shown in TDI's records as having been appointed by Stellar Title to act as escrow officers.
17. On June 17, 2025, TDI notified Stellar Title that it had not appointed the six individuals it was advertising were its escrow officers.
18. On June 20, 2025, Stellar Title filed three FINT09 forms to TDI to appoint three of those escrow officers. Stellar Title later represented to TDI that one of these individuals began acting in an escrow officer capacity on April 1, 2025, and that the other two were in training, and did not act as escrow officers before being appointed.

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19. On June 26, 2025, Stellar Title filed three more FINT09 forms to TDI to appoint the remaining three individuals as escrow officers.
20. On February 12, 2026, TDI discovered and notified Stellar Title that a seventh person was being advertised on its website as an escrow officer, when that person was not shown in TDI's records as having been appointed.
21. On February 19, 2026, Stellar Title filed a FINT09 form to appoint that seventh escrow officer. Stellar Title acknowledged that this seventh individual began acting as an escrow officer on December 29, 2025, after Stellar Title had already begun advertising her as its escrow officer starting December 22, 2025.
22. On the same day, Stellar Title also filed a FINT09 form to cancel the appointment of an escrow officer who separated from employment on December 18, 2025, over two months earlier.

Subsequent Events

23. Stellar Title represents that its website advertisements of unappointed escrow officers was premature and unintentional, and that it has improved its website publication process to prevent erroneous and premature advertising of unappointed escrow officers.
24. Stellar Title represents to TDI that it has recently taken steps to ensure compliance, including:
 - a. implementation of a shared calendar listing quarterly and annual regulatory filing deadlines;
 - b. engagement of outside consultants to assist with and prepare annual trust fund audit reports and statistical reports; and,
 - c. added administrative support staff to better manage escrow officer appointments.

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, 2651.001, 2651.012,

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2651.151-2651.157, 2651.301, and 2703.153; and TEX. GOV'T CODE §§ 2001.051-2001.178.


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. Stellar 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. Stellar Title violated TEX. INS. CODE § 2703.153 by failing to timely submit its 2023 statistical report.
5. Stellar Title violated TEX. INS. CODE § 2651.151 by failing to timely submit an annual trust fund account audit report.
6. Stellar Title violated TEX. INS. CODE § 2651.011(c) and Administrative Rule S.5 of the Basic Manual, Section VI, by failing to timely file multiple T-S5 Forms, the Title Agent Certification of Agent's Quarterly Tax Report.
7. Stellar Title violated TEX. INS. CODE § 2652.1511 and Administrative Rule L-2(III)(A)(2) of the Basic Manual, Section VI, by failing to file multiple Escrow Officer Appointment forms (Form FINT09) to appoint escrow officers before those escrow officers acted in that capacity.
8. Stellar Title violated TEX. INS. CODE § 2652.153 and Administrative Rule L-2(III)(B)(2) of the Basic Manual, Section VI, by failing to immediately file an Escrow Officer Appointment form (Form FINT09) to cancel an appointment.
9. Stellar Title violated 28 TEX. ADMIN. CODE § 21.103(a), by publishing an advertisement, specifically its website, that was not truthful and was misleading either in fact or implication.

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Order

It is further ordered that Stellar Title Group, LLC, pay an administrative penalty of \$13,000 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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Amanda Crawford
Commissioner of Insurance

Recommended and reviewed by:



Leah Gillum, Deputy Commissioner
Fraud and Enforcement Division



Anna Kalapach, Staff Attorney
Enforcement

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Affidavit

STATE OF Texas §

§

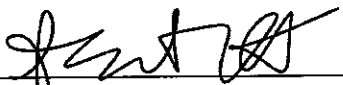
COUNTY OF Collin §

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

"My name is Annette Setliff. 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 CFO/Managing Member and am the authorized representative of Stellar Title Group, LLC. I am duly authorized by said organization to execute this statement.

Stellar Title Group, 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."

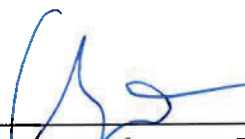


Affiant

SWORN TO AND SUBSCRIBED before me on April 23, _____, 2026.

(NOTARY SEAL)





Signature of Notary Public
Crystal Aguirre

Printed Name of Notary Public