

No. **2026-9919**

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

**Date: 05/11/2026**

**Subjects Considered:**

Prime Title Agency  
11301 Fallbrook Dr., Ste 214  
Houston, Texas 77065-4270

Natalie Henshilwood  
Cypress, Texas 77433

Consent Order  
TDI Enforcement File Nos. 36085 & 37423

**General remarks and official action taken:**

This is a consent order with Prime Title Agency (Prime Title) and Natalie Henshilwood (Henshilwood) (collectively referred to as Respondents) because Respondents were cited for multiple violations of title insurance laws and regulations during a routine title examination. This order suspends Respondents' licenses and requires Respondents to cease and desist from continued violations. The suspensions are probated for a period of two years.

**Waiver**

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

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## Findings of Fact

1. Prime Title, firm identification no. 219111, holds a title agency license originally issued on October 22, 2024.
2. Natalie Henshilwood, individual identification no. 606370, holds an escrow officer license originally issued on September 11, 2023.
3. Prime Title is 100% owned by Henshilwood. She is listed as Prime Title's officer, director, shareholder, onsite manager, and escrow officer.
4. Henshilwood has authority, access, and control over Prime Title's escrow and operating accounts.
5. TDI's Title Examination Section conducted a routine comprehensive audit of Prime Title beginning on April 14, 2025.

### Failure to Maintain Separate and Distinct Accounting for Escrow Funds and Breach of Fiduciary Duties

6. TDI's review of Prime Title's escrow account included summaries of the escrow funds identified in the three-way reconciliations, including detailed analysis of the debit files, deposits in transits, and ending trial balances.
7. Staff identified an unauthorized transfer in the amount of \$8,017.53 on December 23, 2024, from Prime Title's escrow account ending in 2359 held at Bank United, to its operating account ending in 2332 also held at Bank United.
8. This transfer of escrow funds to the operating account was not related to title insurance premiums or other fees earned by Prime Title and was not part of a title insurance closing or pursuant to a disbursement in accordance with a signed settlement statement.
9. Prime Title reimbursed the shortage on March 13, 2025.
10. Respondents allege that the shortage occurred due to an accounting error with the database system it used in processing and closing title transactions. Respondents indicate they have worked with the vendor to prevent this from occurring in the future.

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### Failure to Remit Policy Guaranty Fees

11. Title agents are required to collect and remit a guaranty fee for each owner policy and loan policy issued to the Texas Title Insurance Guaranty Association.
12. Prime Title's fourth quarter of 2024 policy guaranty fees were not remitted by the due date of February 1, 2025, and were not remitted until December 29, 2025.
13. Prime Title's first and second quarters of 2025 policy guaranty fees were due on May 1 and August 1, 2025, and were not remitted until October 15, 2025

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

14. 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.
15. From November 27, 2024, through April 11, 2025, escrow officer P.T. closed at least 19 transactions on behalf of Prime Title prior to being properly appointed.
16. P.T. was appointed by Prime Title on July 17, 2025.

### Failure to Timely Submit Quarterly Tax Reports

17. 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.
18. Prime Title failed to timely submit Form T-S5's for the fourth quarter of 2024 which was due by February 15, 2025. Prime Title submitted the report on July 9, 2025.

### Escrow Accounting Errors

19. A comprehensive audit was performed on escrow accounting records for January and February 2025 for Prime Title's Bank United escrow account ending in 2359.
20. There were multiple inconsistencies between the amounts shown on the escrow trial balance sheet and accounting records in the file.

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21. Specifically, six guaranty file balances were reviewed to verify the amounts shown on the February escrow trial balance on the audited account. Although the balances were correct, the following issues were noted:
- a. The January and February escrow trial balances included a dummy "Research" file with negative ending balances in both months. This dummy file was used to book bank reconciling items, including the unauthorized disbursement from escrow to operating mentioned in Findings of Fact nos. 8-10, above. The January balance included \$8,017.58 and a receipt for \$125 identified as a positive pay return item. The February balance included the two reconciling items from January, and a \$4,805.58 receipt also identified by Prime Title as a positive pay return item. The two positive pay return checks were reissued by Prime Title in March 2025.
  - b. The escrow trial balance included a dummy "Pending Aggregate Payments" file used to book fees for recording, tax certificates, and title evidence. These fees were transferred to the dummy file at closing, but the funds were not disbursed until a later date. Since these funds often did not retain the character of escrow funds after closing, this procedure constituted improper commingling of escrow and operating funds. The operating funds were not adjusted at month's end as required, and all three parts of the three-way reconciliations were overstated.
  - c. The January and February "Uncleared Debit Reports" included two outstanding bank transfers booked on December 2, 2024, for recording fees that were never sent to Prime Title's recording operating account. There was no bank reconciliation adjustment, and the available cash balance was understated by the uncleared transactions.
  - d. The February "Uncleared Credit Report" include an invalid receipt for \$2,100 booked on February 24, 2025. The funds were returned by the bank however no adjustment was reflected on the three-way reconciliation; thus all parts of the three-way reconciliation were overstated.

### Minimum Escrow Accounting Procedures and Internal Controls

22. There were multiple violations of Section V of the Basic Manual under the minimum escrow accounting procedures and internal controls:

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- a. Three-way reconciliations were not signed by the preparer or reviewer;
- b. In all guaranty files reviewed, the invoices did not support the amounts disbursed for recording fees, resulting in an overcharge to the customer in all files; and
- c. Escrow receivables were not cleared within 45 days of the bank statement date for the period in which each receivable occurred.

### Guaranty File Errors

23. A comprehensive audit was performed on a sample of three guaranty files and the following exceptions were noted:
  - a. In all three files, Prime Title charged a "disbursement fee" of \$76.26 per file and a "technology fee" of \$50.26 per file that were paid to and collected by Prime Title in addition to the title insurance premium and escrow fees;
  - b. In one file, the premium collected for the Restrictions, Encroachments, Minerals Endorsement (T-19) issued on a loan policy for a residential real property was incorrect;
  - c. In two files, prior written authorization to use a notary service was not found in the file; and
  - d. In all three files, the Affiliated Business Arrangement Disclosure Statement for the related-party realtor commissioner (two files) and tax certificate provider (all three files) were not found in the files.

### Representations Post Examination

24. Respondents indicate that they have adopted new practices, policies, and procedures, as well as trained staff to ensure compliance with title laws moving forward. Respondents have also indicated they put safeguards in place to ensure that escrow and operating funds and accounts are segregated and not used inappropriately.
25. Respondents represent that they have hired a seasoned escrow officer to oversee all areas of compliance and reporting as required.

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## Ongoing compliance issues

26. As a result of the title examination findings, Prime Title was required to continue sending its three-way reconciliations on a monthly basis to TDI's Title Section.
27. Based on TDI's review of the monthly submissions, Prime Title's compliance issues remain ongoing, including but not limited to inaccurate reconciliation practices for its accounting and disbursements, delinquent payments to underwriters and delinquent remittance of policy guaranty fees, continued commingling of escrow and operating funds, and misstatements of escrow liability.

## **Conclusions of Law**

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.002, 82.051–82.055, 2602.151, 2651.011, 2651.151, 2651.301, 2652.001, 2652.201, and 2702.053; 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. Respondents 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. Respondents failed to timely remit policy guaranty fees, in violation of TEX. INS. CODE § 2602.151, and Administrative Rule G.1.
5. Respondents failed to timely file a copy of its quarterly withholding tax report and evidence that the taxes have been paid, in violation of TEX. INS. CODE § 2651.011(c), and Administrative Rule S.5.
6. Respondents have misappropriated or converted to the applicant's or license holder's own use or illegally withheld money belonging to a title insurance company, an insured, or another person, in violation of TEX. INS. CODE § 2651.301(4).

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7. Respondents have failed to maintain a separate and distinct accounting of escrow funds, and an escrow bank account or accounts separate and apart from all other accounts, in violation of TEX. INS. CODE § 2651.301(7).
8. Respondents allowed unappointed individuals to perform the duties of an escrow officer, in violation of TEX. INS. CODE §§ 2652.001, and Administrative Rule L-2.
9. Respondents have failed to disburse escrow funds only in accordance with a signed settlement statement, in violation of TEX. INS. CODE § 2702.053.
10. Respondents charged unauthorized fees for expenses, in violation of the Basic Manual Rate Rule R-1.
11. Respondents failed to maintain minimum escrow accounting requirements, in violation of Section V of the Basic Manual, at requirements nos. 3, 16, & 17.
12. Respondents failed to make proper disclosures and had errors on guaranty files, in violation the Basic Manual Rate Rules R-1 & R-29; Specific Area and Procedures no. 5 and RESPA Section 3500.15.

### Order

It is ordered that Prime Title Agency and Natalie Henshilwood, as well as any agents, employees, and other representatives, cease and desist from:

1. Willfully violating Title 11 of the Texas Insurance Code;
2. Misappropriating or converting or illegally withholding money belonging to a title insurance company, an insured, or another person;
3. Failing to maintain a separate and distinct accounting of escrow funds and an escrow bank account or accounts separate and apart from all other accounts; and
4. Failing to disburse escrow funds only in accordance with a signed settlement statement.

It is further ordered that Prime Title Agency's title agent license and Natalie Henshilwood's escrow officers licenses are suspended for a period of two years. The suspensions are probated pursuant to the terms and conditions stated in this order.

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If, during the probation period imposed by this order, TDI issues any additional licenses or authorizations to Prime Title Agency or Natalie Henshilwood, those additional licenses or authorizations will be suspended until the probation period imposed by this order has ended. The suspension shall be probated, and the same terms and conditions stated in this order will apply.

Beginning from the date of this order and continuing through the probation period Prime Title Agency and Natalie Henshilwood:


1. Must comply with all laws and regulations as set out in Title 11 of the Texas Insurance Code and the Basic Manual.
2. Must not misappropriate or convert to its or its employees' or its representatives own use or illegally withhold money belonging to a title insurance company, an insured, or another person, pursuant to TEX. INS. CODE § 2651.301(4).
3. Must not engage in fraudulent or dishonest practices, pursuant to TEX. INS. CODE § 2651.301(5).
4. Must maintain a separate and distinct accounting of escrow funds and an escrow bank account or accounts separate and apart from all other accounts, pursuant to TEX. INS. CODE § 2651.301(7).
5. Must disburse escrow funds only in accordance with a signed settlement statement, pursuant to TEX. INS. CODE § 2702.053.
6. Must maintain detailed records, including notary books, signatures, and authorizations, for all closings held during the probation period at any Prime Title Agency location.
7. Must timely file all reports as required by Title 11 of the Texas Insurance Code and the Basic Manual, including but not limited to the annual trust fund audit report, annual statistical report, quarterly tax reports, guaranty fund remittance and taxes, etc.
8. Prime Title Agency and Natalie Henshilwood must notify the department immediately of the following by emailing [EnforcementReports@tdi.texas.gov](mailto:EnforcementReports@tdi.texas.gov):
  - a. any changes in officers, on site management, escrow officers or ownership;

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- b. any state or regulatory actions taken against it including formal and informal actions;
- c. any changes in underwriter appointments;
- d. any civil litigation filed or resolved against Prime Title Agency or Natalie Henshilwood; and
- e. any complaints made against Prime Title Agency or Natalie Henshilwood, as well as a written explanation detailing the steps taken to resolve it.

It is ordered that any violation of the provisions of this order or any other violation of Texas law will result in further disciplinary action against Prime Title Agency and Natalie Henshilwood, including but not limited to revocation of their licenses, administrative penalties, and any other relief as authorized by law.

Signed by:  
  
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\_\_\_\_\_  
Amanda Crawford  
Commissioner of Insurance

Recommended and reviewed by:

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

  
\_\_\_\_\_  
Whitney Fraser, Director of Litigation



**Affidavit**

STATE OF Texas §  
§  
COUNTY OF Harris §

Natalie Henshilwood

Before me, the undersigned authority, personally appeared ~~Melvin Brookins~~, who being by me duly sworn, deposed as follows:

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

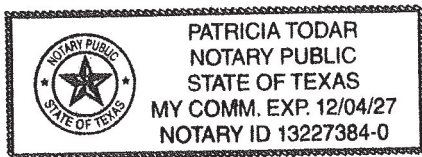
I have knowingly and voluntarily entered into the foregoing consent order and agree with and consent to the issuance and service of the same by the commissioner of insurance of the state of Texas."

Natalie Henshilwood

Affiant

SWORN TO AND SUBSCRIBED before me on April 16<sup>th</sup>, 2020.

(NOTARY SEAL)



[Handwritten Signature]  
Signature of Notary Public

Patricia Todar  
Printed Name of Notary Public