

No. 2026-9928

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

**Date:** 5/18/2026

**Subject Considered:**

Champion Title Agency, LLC  
1806 W. Pearl St.  
Granbury, Texas 76048-1816

Consent Order  
TDI Enforcement File No. 38684

**General remarks and official action taken:**

This is a consent order with Champion Title Agency, LLC (Champion Title). The Texas Department of Insurance (TDI) conducted a title agent compliance audit and discovered violations of the Texas Insurance Code and Texas Administrative Code. Champion Title has agreed to pay an administrative penalty of \$25,000.

**Waiver**

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

**Findings of Fact**

Licensure and Background

1. Champion Title, firm identification number 196821, holds a title agency license issued by TDI on November 9, 2022.

## 2026-9928

Commissioner's Order  
Champion Title Agency, LLC  
Page 2 of 9

2. TDI conducted a comprehensive compliance audit of Champion Title as of December 22, 2025, pursuant to TEX. INS. CODE § 2602.103.

### Failure to Timely Remit Underwriter Premiums

3. In seven months between October 2024 and October 2025, Champion Title failed to timely remit underwriter premiums totaling \$24,562.09 no later than the 15th day of the second month following the month in which the premiums were collected.

### Employment of an Unlicensed Escrow Officer

4. Champion Title appointed a licensed escrow officer Rachel O'Dell, individual identification number 1645233, beginning on November 9, 2022.
5. TDI's records show O'Dell's escrow officer license was canceled on February 28, 2025, when she failed to renew it.
6. Champion Title continued to employ O'Dell as an escrow officer after the cancellation of her license.
7. From February 28, 2025, until December 16, 2025, O'Dell signed 19 title commitments, nine settlement statements, one title policy, and 123 escrow checks for Champion Title.
8. TDI issued O'Dell a new escrow officer license on March 10, 2026, and Champion Title appointed her as its escrow officer the same day.
9. Champion Title assisted and allowed an unlicensed person to act as its escrow officer for more than one year.

### Late-Filed Unencumbered Assets Certification

10. 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.
11. Champion Title submitted its Form T-S1 for 2025 to TDI on November 5, 2025, 36 days late.

## 2026-9928

Commissioner's Order  
Champion Title Agency, LLC  
Page 3 of 9

### Late-Filed Certifications of Quarterly Tax Reports

12. 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.
13. Champion Title failed to timely submit its Certification of Agent's Quarterly Tax Reports (Form T-S5) to TDI for the following time periods:
  - a. first quarter of 2024, due May 15, 2024;
  - b. fourth quarter of 2024, due February 15, 2025;
  - c. first quarter of 2025, due May 15, 2025; and
  - d. third quarter of 2025, due November 15, 2025.
14. Champion Title submitted its Form T-S5 for these respective quarters on:
  - a. June 11, 2024, 27 days late;
  - b. March 17, 2025, 30 days late;
  - c. July 28, 2025, 74 days late; and
  - d. November 24, 2025, 9 days late.

### Failure to Timely and Properly Remit Policy Guaranty Fees

15. Champion Title failed to timely remit its policy guaranty fees to the Texas Title Insurance Guaranty Association (TTIGA) for the third quarter of 2025.
16. When Champion Title remitted the fees to TTIGA late, it also improperly remitted the fees in two payments, rather than on a single remittance form and in a single payment.

### Failure to Timely File Annual Trust Fund Account Audit Reports

17. 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"). The report is due before the 91st day after the end of the title agency's fiscal year.
18. Champion Title's fiscal year ended on October 31, 2024, and October 31, 2025.

## 2026-9928

Commissioner's Order  
Champion Title Agency, LLC  
Page 4 of 9

19. Champion Title failed to timely file its 2024 and 2025 annual audit of trust fund accounts due January 29, 2025, and January 29, 2026, respectively. Specifically, TDI received the:
  - a. 2024 audit report on July 28, 2025, 180 days late; and
  - b. 2025 audit report on April 1, 2026, 62 days late.

### Escrow Accounting Errors

20. Comprehensive audit procedures were performed on Champion Title's escrow accounting records for September and October 2025. Balances from 15 guaranty files were reviewed to verify amounts shown on the October escrow trial balance. Although the balances were correct, the escrow liability was misstated.
21. Champion Title included invalid outgoing wires in its outstanding checklist for September and October 2025. The outgoing wires were booked August 18, 2025, and October 20 and 29, 2025. All three wires cleared the bank the same day they were booked which resulted in all three parts of the three-way reconciliation being understated.
22. Champion Title included a "dummy file" containing unidentifiable monies in its escrow trial balance. Since the funds were not associated with an identifiable escrow file, the escrow liability was misstated for all three parts of the three-way reconciliation.

### Minimum Accounting Procedures and Internal Controls

23. In three files, the invoices maintained did not support the amount disbursed for recording fees, documentation preparation, and homeowners insurance.
24. In three files, Champion Title failed to maintain an invoice or other support various disbursements for fees, taxes, and homeowners insurance.
25. Champion Title failed to reimburse escrow receivables within 45 days of the date of the bank statement for the period in which each receivable occurred.

## 2026-9928

Commissioner's Order  
Champion Title Agency, LLC  
Page 5 of 9

### Guaranty File Errors

26. TDI randomly sampled guaranty files for compliance, including four files for comprehensive review, five files for directly issued policies, five files for debit balance, and 15 files for limited review.
27. In one file, Champion Title failed to disclose the name of the party receiving payment on the settlement statement.
28. In two files, Champion Title failed to have the disbursement payee match the payee disclosed on the settlement statement.
29. In one file, the disbursement amount listed for a city lien payoff did not match the amount shown on the settlement statement.
30. In one file, Champion Title failed to include a disbursement for the resale certificate on the settlement statement.
31. In 13 files, the settlement statement was not signed by the settlement agent.
32. In eight files, the premium split for title services was not disclosed on the settlement statement.
33. In two files, Champion Title over disbursed funds thereby creating a debit balance.
34. In eight files, Champion Title failed to disclose an anticipated premium split for title services on Schedule D of the title commitment.
35. In two files, Champion Title failed to maintain the signed outgoing wire authorization form in the scanned files.
36. In one file, Champion Title failed to prepare the required Texas Disclosure Form T-64 for a transaction where a closing disclosure was used.
37. In three files, Champion Title failed to maintain a prior written authorization to use a notary service.
38. In three files, all parties receiving a portion of the real estate commission were not disclosed on the settlement statement.

**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, 2651.151-2651.257, and 2651.301; and 28 TEX. ADMIN CODE § 9.1, which adopts 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. Champion 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. Champion Title violated Rule R-2 of the Basic Manual, Section III, by failing to timely remit underwriter premiums.
5. Champion Title violated TEX. INS. CODE § 2652.001 and Administrative Rule L-2(III)(A)(2) of the Basic Manual, Section VI, by employing an unlicensed escrow officer.
6. Champion Title violated Administrative Rule S.1 of the Basic Manual, Section VI, by failing to timely submit its Unencumbered Assets Certification Reports (Form T-S1).
7. Champion Title violated Administrative Rule S.5 of the Basic Manual, Section VI, by failing to timely submit its Certifications of Agent's Quarterly Tax Report (Form T-S5).
8. Champion Title violated TEX. INS. CODE § 2602.151 and Administrative Rule G.1 of the Basic Manual, Section VI, by failing to timely remit policy guaranty fees on a single remittance form and in a single payment.
9. Champion Title violated TEX. INS. CODE § 2651.151 by failing to timely submit two annual audit reports of trust fund accounts.

## 2026-9928

Commissioner's Order

Champion Title Agency, LLC

Page 7 of 9


10. Champion Title violated Minimum Escrow Accounting Procedures and Internal Controls Requirements 1 and 2 of the Basic Manual, Section V, by failing to maintain accurate escrow trial balances and three-way reconciliations of the bank balance, book balance, and escrow trial balance.
11. Champion Title violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 16 of the Basic Manual, Section V, by failing to maintain invoices in the file that supported disbursements.
12. Champion Title violated Minimum Escrow Accounting Procedures and Internal Controls Requirement 17 of the Basic Manual, Section V, by failing to timely reimburse escrow receivables.
13. Champion Title violated TEX. INS. CODE §2702.053 by failing to disclose required and accurate content and information in settlement statements.
14. Champion Title violated Procedural Rule P-21 of the Basic Manual, Section IV, by failing to disclose the anticipated premium split on Schedule D of the title commitment.
15. Champion Title violated Procedural Rule P-32 of the Basic Manual, Section IV, by failing to maintain the signed outgoing wire authorization form in the scanned file.
16. Champion Title violated Procedural Rule P-73 of the Basic Manual, Section IV, by failing to prepare the required Texas Disclosure Form T-64 for a transaction where a closing disclosure was used.
17. Champion Title violated Specific Areas and Procedures Number 5 of the Basic Manual, Section V, by failing to maintain a prior writer authorization to use a notary service in the file.

# 2026-9928

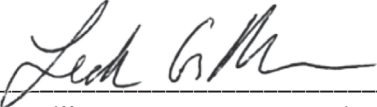
Commissioner's Order  
Champion Title Agency, LLC  
Page 8 of 9

## Order

It is ordered that Champion Title Agency, LLC 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:  
  
FE10434BC41A470...  
Amanda Crawford  
Commissioner of Insurance

Recommended and reviewed by:

  
Leah Gillum, Deputy Commissioner  
Fraud and Enforcement Division

  
Kaycee Crisp, Staff Attorney  
Enforcement

**Affidavit**

STATE OF Texas §

COUNTY OF Hood §

Before me, the undersigned authority, personally appeared Rachel O'Dell who being by me duly sworn, deposed as follows:

"My name is Rachel O'Dell. 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 manager and am the authorized representative of Champion Title Agency, LLC. I am duly authorized by said organization to execute this statement.

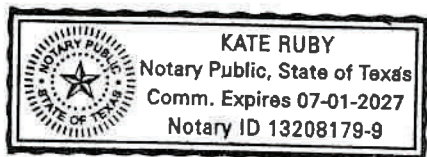
Champion Title Agency, LLC has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

Rachel O'Dell

Affiant

SWORN TO AND SUBSCRIBED before me on May 7th, 2026.

(NOTARY SEAL)



Kate Ruby  
Signature of Notary Public

Kate Ruby  
Printed Name of Notary Public