

No. **2025-9377**

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

**Date: 06/27/2025**

**Subjects Considered:**

Texas First Title Partners, LLC  
dba Citizen Title  
13201 Northwest Freeway, Ste 150  
Houston, Texas 77040-6155

Jared Houston Graves, Sr.  
Houston, Texas 77095

Emergency Cease and Desist Order  
TDI Enforcement File Nos. 37136 & 37137

**General remarks and official action taken:**

The Texas Commissioner of Insurance has reviewed the application for an Emergency Cease and Desist Order under chapter 83 of the Texas Insurance Code. The application alleges that Texas First Title Partners, LLC, doing business as Citizen Title (Citizen Title), along with Jared Houston Graves, Sr., are operating in a hazardous financial condition because they are misappropriating escrow funds intended for title insurance closings, engaging in fraudulent and dishonest practices, failing to maintain separate and distinct accounting of escrow accounts from other accounts, and failing to disburse escrow funds only in accordance with the signed settlement statement.

**Jurisdiction**

The Commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 83.002(a)(7) and (b)(2), 83.051—83.153, 2602.103, 2651.151, 2651.301 and 2702.053; 28 TEX. ADMIN. CODE §§ 1.901, 1.903, and 1.905; and TEX. GOV'T. CODE §§ 2001.051—2001.178.

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## Findings and Order

The Commissioner believes the application meets the requirements of TEX. INS. CODE § 83.051 and 28 TEX. ADMIN. CODE § 1.901 for the issuance of an emergency cease and desist order and incorporates the "Statement of Charges" as Exhibit A, attached.

Accordingly, the Commissioner finds as follows:

1. Citizen Title is an authorized person, as defined in TEX. INS. CODE §§ 83.001(1) and 83.002(a)(7) and (b)(2), because it currently holds a title insurance agency license.
2. Citizen Title's last known address provided to TDI is 13201 Northwest Freeway, Ste 150, Houston, Texas 77040-6155.
3. Jared Houston Graves, Sr., is an authorized person, as defined in TEX. INS. CODE §§ 83.001(1) and 83.002(b)(2), because he currently holds an escrow officers license.
4. Grave's last known addresses provided to TDI are at [REDACTED] and at 7676 Hillmont Street, Ste 290 P, Houston, Texas 77040.
5. Citizen Title is operating in a hazardous financial condition, as contemplated by TEX. INS. CODE § 83.051(a)(1)(A)(ii).
6. Citizen Title has willfully violated Title 11 of the Texas Insurance Code, in violation of TEX. INS. CODE § 2651.301(1).
7. Citizen Title has 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).
8. Citizen Title is guilty of fraudulent or dishonest practices, in violation of TEX. INS. CODE § 2651.301(5).
9. Citizen Title has 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).

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10. Citizen Title has failed to disburse escrow funds only in accordance with a signed settlement statement, in violation of TEX. INS. CODE § 2702.053.
11. Unless Citizen Title is immediately ordered to cease and desist from this conduct, Citizen Title will continue to operate in a hazardous financial condition and manner.

The Commissioner orders that Texas First Title Partners, LLC, doing business as Citizen Title, and Jared Houston Graves, Sr., as well as its agents, employees, and other representatives, shall immediately cease and desist from doing the following:

1. Operating in a hazardous financial condition;
2. Willfully violating Title 11 of the Texas Insurance Code;
3. Misappropriating or converting to Texas First Title Partners, LLC, doing business as Citizen Title's own use or illegally withholding money belonging to a title insurance company, an insured, or another person;
4. Engaging in fraudulent or dishonest practices;
5. 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
6. Failing to disburse escrow funds only in accordance with a signed settlement statement.

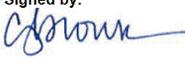
The Commissioner issues this order under the authority in TEX. INS. CODE Chapter 83 and 28 TEX. INS. CODE Chapter 1, Subchapter H. This order is final on the 61st day after it is served, unless Texas First Title Partners, LLC, doing business as Citizen Title, and Jared Houston Graves, Sr. requests a hearing under TEX. INS. CODE § 83.053. The burden of requesting a hearing is on Texas First Title Partners, LLC, doing business as Citizen Title, and Jared Houston Graves, Sr. A request for a hearing to contest this order must be in writing, directed to the Commissioner, and must state the grounds for the request to set aside or modify the order.

Penalties, including revocation of its license, may be assessed against Texas First Title Partners, LLC, doing business as Citizen Title, or Jared Houston Graves, Sr. if any violate this order under Texas Insurance Code, Chapter 83, Subchapter C. The Commissioner may

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order Texas First Title Partners, LLC, doing business as Citizen Title, or Jared Houston Graves, Sr. to pay administrative penalties for a violation of this order in the amount of \$25,000 for each act of violation. The Commissioner may also direct Texas First Title Partners, LLC, doing business as Citizen Title, or Jared Houston Graves, Sr. to make restitution for each violation of this order.

Signed by:  
  
FC5D7EDDFFB4F8...

Cassie Brown  
Commissioner of Insurance

**TDI ENFORCEMENT FILE NOS. 37136 & 37137**

**TEXAS DEPARTMENT OF INSURANCE,  
Petitioner**

**v.**

**TEXAS FIRST TITLE PARTNERS, LLC,  
dba CITIZEN TITLE and  
JARED HOUSTON GRAVES, SR,  
Respondents**

**BEFORE THE  
TEXAS COMMISSIONER  
OF  
INSURANCE**

**APPLICATION FOR EX PARTE EMERGENCY CEASE AND DESIST ORDER**

The Texas Department of Insurance (TDI) makes this application for an ex parte emergency cease and desist order against Texas First Title Partners, LLC, doing business as Citizen Title, and Jared Houston Graves, Sr. (collectively, "Citizen Title") pursuant to Texas Insurance Code Chapter 83. TDI obtained evidence demonstrating Citizen Title, through Graves, is operating in a hazardous financial condition. In support of this application, TDI makes the following allegations:

**Jurisdiction**

The Commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 83.001(1), 83.002(a)(7) and (b)(2), 83.051—83.153, 2602.103, 2651.151, 2651.301 and 2702.053; 28 TEX. ADMIN. CODE §§ 1.901, 1.903 and 1.905; and TEX. GOV'T. CODE §§ 2001.051—2001.178.

**Statement of Charges**

1. This application for an ex parte emergency cease and desist order is brought for the purpose of obtaining a cease-and-desist order against Citizen Title. If granted, Citizen Title, as well as its agents, employees and other representatives, will be ordered to cease and desist from operating in a hazardous financial condition including, but not limited to, misappropriating escrow funds intended for title insurance closings, engaging in fraudulent and dishonest practices, failing to maintain separate and distinct accounting of escrow accounts from other accounts, and failing to disburse escrow funds only in accordance with the signed settlement statements.

**EXHIBIT**

**A**

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2. Citizen Title, organization identification no. 180903, holds a title agency license issued on June 14, 2021.
3. Citizen Title is wholly owned by Graves, individual identification no. 2308051, who holds an escrow officer license originally issued on June 14, 2021, but expired due to a failure to renew on May 1, 2025. Graves renewed his escrow officer license on May 29, 2025.
4. Graves is one of three escrow officers and one of two onsite managers for Citizen Title.
5. Graves has authority, access, and control over Citizen Title's escrow account and operating account.
6. Citizen Title is appointed with First American Title Guaranty Company since May 26, 2023, for Harris and Brazoria counties and with First National Title Insurance Company since June 14, 2021, also for Harris and Brazoria counties.
7. Citizen Title has two office locations in Houston. The last known address provided in writing to TDI for Citizen Title is at 13201 Northwest Freeway, Ste 150, Houston, Texas 77040-6155. The last known address provided in writing to TDI for Graves is at [REDACTED], and at 7676 Hillmont Street, Ste 290 P, Houston, Texas 77040, which is the second office location for Citizen Title. See Exhibit 1.

### Citizen Title is Operating in a Hazardous Condition

8. TDI's Title Examination Section conducted a routine audit of Citizen Title in September 2024. Based on the findings and lack of follow-up information from the routine audit, TDI's Title Examination Section conducted a targeted audit of Citizen Title in May 2025.
9. TDI staff obtained evidence that Citizen Title misappropriated or converted to its own use money belonging to a title insurance company, an insured or other person; engaged in fraudulent or dishonest practices; and failed to maintain separate and distinct accounting of escrow funds. Citizen Title has also failed to

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make payments of escrow funds only to parties shown on the settlement statements and breached its fiduciary duties.

10. Based on the evidence, Citizen Title appears to be operating in a hazardous financial condition.

### Escrow and Operating Account Deficiencies and Reconciliation Discrepancies

11. Staff's routine comprehensive audit of Citizen Title's escrow account included review of 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.
12. The routine audit occurred in September 2024, and the final audit report was sent to Graves on January 25, 2025. Citizen Title's response was due to TDI by February 18, 2025. *See Exhibit 2.*
13. In sending the audit report to Citizen Title, TDI pointed out that there were multiple negative balances totaling \$57,516.33 that needed reimbursement. There were also \$9,010.51 in deposits on the deposits-in-transit list that were file shortages that needed to be cleared. *See Exhibit 2.*
14. The issues with the escrow account were summarized as follows in the report:
  - a. The June and July 2024 escrow trial balances contained "dummy" files ("Stellar Utility", "Bank Charges", "Research", and "Pending Aggregate Payments") used to book bank fees, reconcile items, for fees owed to the agent, tax certificates, and recording fees. Since these funds do not retain the character of escrow funds after closing, this procedure constituted the improper commingling of escrow and operating funds and led to incorrect three-way reconciliations.
  - b. The June and July 2024 deposits-in-transit lists included nine invalid entries for incoming wires (\$0.04, \$805, \$275, \$2,200, \$1,259.47, \$1,000, \$2,500, \$471, and \$500) that were booked between September 2023 and July 2024 to obscure shortages in the escrow account. Citizen Title never received the funds. All three parts of the three-way reconciliation were overstated.

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- c. The June and July 2024 outstanding checklists included invalid outgoing wires (\$70, \$591.15, \$18, \$64.15, \$6, \$16, \$10, \$8, \$12, \$280.28, \$10, \$14, \$12, \$1,890.46, and \$18,742.25) that were booked between June 2023 and June 2024 but were never wired out. The outgoing wires were improperly shown as outstanding items on the bank reconciliation, instead of being added back to the book and escrow trial balances. All three parts of the three-way reconciliation were understated.
15. There were also issues with Citizen Title's operating account noted as follows:
  - a. The operating accounts at City Bank ending in #1433 #7615, were overdrawn for significant periods of time during the months of July and August 2024. The account at City Bank ending in #1433 was overdrawn for 37 days from July 8, 2024, to August 15, 2024. Additionally, the account at City Bank ending in #7615 was overdrawn 15 days in the month of August 2024.
16. TDI informed Citizen Title that the shortages were required to be reimbursed within 45 days of the month in which they occur. TDI asked for validated receipts, confirmation wires, or bank statements to show proof that all shortages have been reimbursed. See Exhibit 2.
17. TDI also required Citizen Title to send its monthly three-way reconciliations along with the monthly bank statement with images to our office by the 25th of every month, starting with the January 2025 three-way reconciliation due February 25, 2025. See Exhibit 2.
18. Graves responded to the final audit report on March 3, 2025, but he failed to mention or respond to TDI's requests for reimbursement of the shortages. See Exhibit 3.
19. TDI has still not obtained any proof that those shortages were returned to the escrow accounts.
20. On May 6, 2025, TDI notified Graves that TDI would be conducting an onsite visit of Citizen Title to begin on May 14, 2025. The targeted audit was to review the

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escrow and operating account records due to the findings of the previous exam and the failure to reimburse escrow accounts. See Exhibit 4.

21. TDI reviewed disbursement sheets and three-way reconciliations for April of 2025.
22. TDI requested that Graves have a ledger sheet and explanations as to numerous shortages on the escrow trail balance and deposits in transit that had not been cleared, with a deadline of May 19th. See Exhibit 4.
23. During this targeted audit of Citizen Title's three-way reconciliations, TDI discovered that as of April 30, 2025, Citizen Title had debit balances of \$39,251.66 and invalid deposits-in-transit of \$17,778.26, totaling \$57,029.92. See Exhibit 5, the April 2025 three-way reconciliation.
24. In reviewing the April three-way reconciliation, it was also noted that on April 2, 2025, an outgoing wire was sent from the escrow account ending in #9161 to L.C., an employee, and the notation stated "payroll" for \$2,000. This use of escrow account funds for operating purposes was reimbursed to the escrow account ending #9161 from the operating account on April 17, 2025, with the notation "Account Corrections." See Exhibit 5.
25. On May 19, 2025, Graves responded to TDI questions about the shortages discovered in the targeted exam with only partial information and failed to provide any of the requested proof that the discovered shortages had been reimbursed. See Exhibit 6.
26. When asked specifically about the payroll transaction which took escrow funds and used them for operating purposes, Graves indicated that it was a "mental mistake" and that he had already reimbursed the account. See Exhibit 7.
27. Through email correspondence and meetings with Graves during the time of TDI's targeted audit, Graves admitted that Citizen Title was "short" a lot of money in escrow accounts and would do everything possible within the following 45 days to reimburse the escrow funds. Graves also indicated that Citizen Title would begin making entries back to escrow accounts as its operating account grows. See Exhibit 6.

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### Legal Grounds for Cease-and-Desist Order

1. The Commissioner has jurisdiction over this matter under TEX. INS. CODE Chapter 83, and 28 TEX. ADMIN. CODE §§ 1.901, 1.903, and 1.905.
2. The Commissioner has the authority to issue this ex parte emergency cease and desist order under TEX. INS. CODE § 83.051 and 28 TEX. ADMIN. CODE § 1.901.
3. Texas First Title Partners, LLC, doing business as Citizen Title is an authorized person, as defined in TEX. INS. CODE §§ 83.001(1), 83.002(a)(7), and (b)(2).
4. Jared Houston Graves, Sr. is an authorized person, as defined in TEX. INS. CODE §§ 83.001(1) and 83.002(b)(2).
5. Citizen Title is operating in a hazardous financial condition, as contemplated by TEX. INS. CODE § 83.051(a)(1)(A)(ii).
6. Citizen Title has willfully violated Title 11 of the Texas Insurance Code, in violation of TEX. INS. CODE § 2651.301(1).
7. Citizen Title has 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).
8. Citizen Title is guilty of fraudulent or dishonest practices, in violation of TEX. INS. CODE § 2651.301(5).
9. Citizen Title has 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).
10. Citizen Title has failed to disburse escrow funds only in accordance with a signed settlement statement, in violation of TEX. INS. CODE § 2702.053.

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### **Conclusion and Prayer for Relief**

TDI requests that the Commissioner, immediately and without notice or hearing, issue a cease-and-desist order pursuant to TEX. INS. CODE § 83.051 and 28 TEX. ADMIN. CODE § 1.901 ordering Texas First Title Partners, LLC, doing business as Citizen Title and Jared Houston Graves, Sr., as well as its agents, employees, and other representatives, to cease and desist from:

1. Operating in a hazardous financial condition, as contemplated by TEX. INS. CODE § 83.051(a)(1)(A)(ii).
2. Willfully violating Title 11 of the Texas Insurance Code, in violation of TEX. INS. CODE § 2651.301(1).
3. Misappropriating or converting to its own use or illegally withholding money belonging to a title insurance company, an insured, or another person, in violation of TEX. INS. CODE § 2651.301(4).
4. Engaging in fraudulent or dishonest practices, in violation of TEX. INS. CODE § 2651.301(5).
5. 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, in violation of TEX. INS. CODE § 2651.301(7).
6. Failing to disburse escrow funds only in accordance with a signed settlement statement, in violation of TEX. INS. CODE § 2702.053.

TDI requests the Commissioner impose any other just and appropriate relief to which TDI may be entitled to by law.

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Respectfully submitted on June 17, 2025,



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Whitney Ellis Fraser, Director  
Enforcement  
State Bar No. 24057835  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 676-6341 (Direct)  
(512) 490-1020 (Fax)  
Whitney.Fraser@tdi.texas.gov

# Firm Information Inquiry (Internal)

NAME: TEXAS FIRST TITLE PARTNERS, LLC

State Of TEXAS

DISPLAY RESULTS FOR: Active Information Only

# 2025-9377

### FIRM DETAILS

|               |                                 |                 |                     |                 |
|---------------|---------------------------------|-----------------|---------------------|-----------------|
| ORG ID        | NAME                            | EIN             | NPN                 | CRD NUMBER      |
| 180903        | TEXAS FIRST TITLE PARTNERS, LLC | 86-3019705      | 19949568            |                 |
| STATUS        | STATUS DATE                     | RESIDENT        | DEPARTMENT ACTION   | BANK AFFILIATED |
| Active        | 06-14-2021                      | Yes             | No                  | No              |
| EMAIL ADDRESS | WEB SITE                        | MONITORING TYPE | NUMBER OF EMPLOYEES | AMOUNT OF SALES |

### INDEPENDENTLY OWNED

|                 |                           |                  |
|-----------------|---------------------------|------------------|
| RESIDENT STATES | ORGANIZATIONAL STRUCTURE  | DOMICILE COUNTRY |
| Texas           | Limited Liability Company |                  |

### OWNERS/OFFICERS/PARTNERS/DIRECTORS

| NAME                | TITLE  | RELATIONSHIP TYPE         | OWNERSHIP | % OWNERSHIP |
|---------------------|--------|---------------------------|-----------|-------------|
| JARED HOUSTONGRAVES | MEMBER | Ownt, Ptnr, Offcr, Dirctr | Yes       | 100         |

### LIMITATIONS AND RESTRICTIONS

#### LIMITATIONS

|                                |            |          |
|--------------------------------|------------|----------|
| Appointment - No               | BEGIN DATE | END DATE |
| License - No                   |            |          |
| Qualification - No             |            |          |
| RESTRICTIONS                   |            |          |
| Admn Review/License Limitation | 05-22-2025 |          |

### CONTACT INFORMATION

|  |              |           |
|--|--------------|-----------|
| BUSINESS LOCATION (Effective Date: 08-24-2023) | PHONE NUMBER | EXTENSION |
| GRAVES, JARED                                  | 832-834-0462 |           |
| 13201 NORTHWEST FWY STE 150                    | FAX NUMBER   | EXTENSION |
| HOUSTON, TX 77040-6155                         |              |           |

### MAILING (Effective Date: 08-24-2023)

|                             |               |                          |                               |
|-----------------------------|---------------|--------------------------|-------------------------------|
| GRAVES, JARED               | EMAIL ADDRESS | COMMUNICATION PREFERENCE | COMMUNICATION PREFERENCE TYPE |
| 13201 NORTHWEST FWY STE 150 | [REDACTED]    | Electronic Mail          |                               |
| HOUSTON, TX 77040-6155      | PHONE NUMBER  | EXTENSION                |                               |
|                             | 832-834-0462  |                          |                               |
|                             | FAX NUMBER    | TOLL FREE NUMBER         | EXTENSION                     |
|                             |               |                          |                               |

### ADDRESS HISTORY

|                             |            |            |
|-----------------------------|------------|------------|
| BUSINESS LOCATION ADDRESS   | BEGIN DATE | END DATE   |
| 13201 NORTHWEST FWY STE 225 | 09-15-2021 | 08-24-2023 |
| HOUSTON, TX 77040-6165      |            |            |
| BUSINESS LOCATION ADDRESS   | BEGIN DATE | END DATE   |
| 7676 HILLMONT ST STE 290 P  | 05-26-2021 | 09-15-2021 |
| HOUSTON, TX 77040           |            |            |
| MAILING ADDRESS             | BEGIN DATE | END DATE   |
| 13201 NORTHWEST FWY STE 225 | 09-15-2021 | 08-24-2023 |
| HOUSTON, TX 77040-6165      |            |            |
| MAILING ADDRESS             | BEGIN DATE | END DATE   |
| 7676 HILLMONT ST STE 290 P  | 05-26-2021 | 09-15-2021 |
| HOUSTON, TX 77040           |            |            |

### LICENSES AND ACTIVE QUALIFICATIONS

|              |                |                     |        |                |                 |                     |
|--------------|----------------|---------------------|--------|----------------|-----------------|---------------------|
| LICENSE TYPE | LICENSE NUMBER | ORIGINAL ISSUE DATE | STATUS | EFFECTIVE DATE | EXPIRATION DATE | INACTIVATION REASON |
| Title Agency | 2682182        | 06-14-2021          | Active | 06-14-2021     | 07-01-2025      |                     |

### ACTIVE QUALIFICATIONS

Underwriter



# Firm Information Inquiry (Internal)

State Of TEXAS

NAME: TEXAS FIRST TITLE PARTNERS, LLC

DISPLAY RESULTS FOR: Active Information Only

**2025-9377**

| QUALIFICATIONS                         |                          |                        |                |                |                          |                     |                        |                |  |  |
|--|--------------------------|------------------------|----------------|----------------|--------------------------|---------------------|------------------------|----------------|--|--|
| QUALIFICATION TYPE                     | LICENSE RESIDENCY        | ORIGINAL ISSUE DATE    | STATUS         | EFFECTIVE DATE | RESIDENT EXPIRATION DATE | INACTIVATION REASON | TERMINATION REASON     | RESIDENCY DATE |  |  |
| Underwriter                            | Resident                 | 06-14-2021             | Active         | 06-14-2021     |                          |                     |                        | 06-14-2021     |  |  |
| AFFILIATIONS                           |                          |                        |                |                |                          |                     |                        |                |  |  |
| COMPANY                                | EIN                      | NAIC ID                | LICENSE NUMBER | STATUS         | ACTIVE DATE              | TERMINATION DATE    | TERMINATION REASON     |                |  |  |
| First American Title Guaranty Company  | 72-0976930               | 51624                  | 5514           | Active         | 05-26-2023               |                     |                        |                |  |  |
| First National Title Insurance Company | 45-4486928               | 14240                  | 13764509       | Active         | 06-14-2021               |                     |                        |                |  |  |
| APPOINTMENTS                           |                          |                        |                |                |                          |                     |                        |                |  |  |
| COMPANY                                | EIN                      | NAIC ID                | LICENSE NUMBER | STATUS         | ACTIVE DATE              | TERMINATION DATE    | TERMINATION REASON     | EFFECTIVE DATE |  |  |
| First American Title Guaranty Company  | 72-0976930               | 51624                  | 5514           | Active         | 05-26-2023               |                     |                        | 05-26-2023     |  |  |
| APPOINTMENT TYPE                       |                          |                        |                |                |                          |                     |                        |                |  |  |
| Underwriter                            | Active                   |                        |                |                |                          |                     |                        |                |  |  |
| COUNTY                                 |                          |                        |                |                |                          |                     |                        |                |  |  |
| Brazoria                               | Active                   |                        |                |                | 04-02-2024               |                     |                        |                |  |  |
| Harris                                 | Active                   |                        |                |                | 05-26-2023               |                     |                        |                |  |  |
| COMPANY                                |                          |                        |                |                |                          |                     |                        |                |  |  |
| First National Title Insurance Company | 45-4486928               | 14240                  | 13764509       | Active         | 06-14-2021               |                     |                        | 06-14-2021     |  |  |
| APPOINTMENT TYPE                       |                          |                        |                |                |                          |                     |                        |                |  |  |
| Underwriter                            | Active                   |                        |                |                |                          |                     |                        |                |  |  |
| COUNTY                                 |                          |                        |                |                |                          |                     |                        |                |  |  |
| Brazoria                               | Active                   |                        |                |                | 02-21-2024               |                     |                        |                |  |  |
| Brazoria                               | Inactive                 |                        |                |                | 06-14-2021               | 10-08-2021          | Cancelled              |                |  |  |
| Fort Bend                              | Inactive                 |                        |                |                | 06-14-2021               | 10-08-2021          | Cancelled              |                |  |  |
| Galveston                              | Inactive                 |                        |                |                | 06-14-2021               | 10-08-2021          | Cancelled              |                |  |  |
| Harris                                 | Active                   |                        |                |                | 06-14-2021               |                     |                        |                |  |  |
| Montgomery                             | Inactive                 |                        |                |                | 06-14-2021               | 10-08-2021          | Cancelled              |                |  |  |
| INDIVIDUAL ASSOCIATIONS                |                          |                        |                |                |                          |                     |                        |                |  |  |
| NPIN                                   | NAME                     | ASSOCIATION TYPE       | BEGIN DATE     | END DATE       | TERMINATION REASON       |                     |                        |                |  |  |
| 19320372                               | CONN, LINDA D            | EO - Bonafide Employee | 09-23-2024     |                |                          |                     |                        |                |  |  |
| 19774461                               | GRAVES, JARED HOUSTON SR | EO - Bonafide Employee | 06-14-2021     |                |                          |                     |                        |                |  |  |
| 19774461                               | GRAVES, JARED HOUSTON SR | TA-Manager             | 06-14-2021     |                |                          |                     |                        |                |  |  |
| 19774461                               | GRAVES, JARED HOUSTON SR | TA-Member              | 06-14-2021     |                |                          |                     |                        |                |  |  |
| 19774461                               | GRAVES, JARED HOUSTON SR | TA-Onsite Manager      | 04-27-2022     |                |                          |                     |                        |                |  |  |
| 20566230                               | LOCHRIDGE, LYNDIA        | EO - Bonafide Employee | 12-20-2022     |                |                          |                     |                        |                |  |  |
| 17165187                               | NAVARRO, LESLIE BOLT     | EO - Bonafide Employee | 12-21-2023     |                |                          |                     |                        |                |  |  |
| 17165187                               | NAVARRO, LESLIE BOLT     | TA-Onsite Manager      | 02-20-2024     |                |                          |                     |                        |                |  |  |
| RESPONSIBLE INDIVIDUALS                |                          |                        |                |                |                          |                     |                        |                |  |  |
| NAME                                   | RELATIONSHIP TYPE        | TITLE                  |                |                |                          |                     |                        |                |  |  |
| GRAVES, JARED HOUSTON                  | Ownr, Prtnr, Offer, Dtrr | MEMBER                 |                |                |                          |                     |                        |                |  |  |
| ALIASES                                |                          |                        |                |                |                          |                     |                        |                |  |  |
| ALIAS NAME                             | TYPE                     | EFFECTIVE DATE         | END DATE       | COMMENT        |                          |                     |                        |                |  |  |
| CITIZEN TITLE                          | Doing Business As        | 06-14-2021             |                |                |                          |                     |                        |                |  |  |
| BONDS                                  |                          |                        |                |                |                          |                     |                        |                |  |  |
| COMPANY NAME                           | BOND REQUIRED            | BOND RECEIVED          | BOND NUMBER    | EFFECTIVE DATE | TERMINATION DATE         | AMOUNT              | BOND TYPE              |                |  |  |
| GREAT AMERICAN INSURANCE COMPANY       | Yes                      | Yes                    |                | 04-02-2021     |                          | \$ 20,000.00        | Escrow Bond            |                |  |  |
| GREAT AMERICAN INSURANCE COMPANY       | Yes                      | Yes                    |                | 04-02-2021     |                          | \$ 25,000.00        | Title Agency Bond      |                |  |  |
| GREAT AMERICAN INSURANCE COMPANY       | Yes                      | Yes                    |                | 04-02-2021     |                          | \$ 150,000.00       | Minimum Capitalization |                |  |  |

# Firm Information Inquiry (Internal)

State Of TEXAS

NAME: TEXAS FIRST TITLE PARTNERS, LLC

DISPLAY RESULTS FOR: Active Information Only

2025-9377

| COMMENTS          |                          |                   |                |                |               |             |
|-------------------|--------------------------|-------------------|----------------|----------------|---------------|-------------|
| DATE              | COMMENT                  |                   |                |                |               |             |
| 05-22-2025        | on AR/LL per Title Exams |                   |                |                |               |             |
| APPLICATIONS      |                          |                   |                |                |               |             |
| APPLICATION ID    | APPLICATION TYPE         | LICENSE TYPE      | RECEIVED DATE  | LICENSE NUMBER | STATUS        | STATUS DATE |
| 2355462           | New License              | Title Agency      | 05-26-2021     | 2682182        | Approved      | 06-14-2021  |
| PROBLEM REPORTS   |                          |                   |                |                |               |             |
| PROBLEM REPORT ID | INCIDENT DATE            | COMPLAINANT NAME  | COMPLAINT TYPE | STATUS         | COVERAGE TYPE |             |
| 363226            |                          |                   | Complaint      | Closed         | Miscellaneous |             |
| COVERAGE LEVEL    |                          | CODE VIOLATION(S) |                | ECASE ID       |               |             |
| Title Insurance   |                          |                   |                |                |               |             |

# Individual Information Inquiry

# 2025-9377

Display Results For: All Information

Name: GRAVES, JARED HOUSTON

State Of: TEXAS

### INDIVIDUAL DETAILS

|                 |                          |             |                       |                 |                        |
|-----------------|--------------------------|-------------|-----------------------|-----------------|------------------------|
| INDIVIDUAL ID   | NAME                     | STATUS DATE | LICENSEE              | NPN             | CRD NUMBER             |
| 2308051         | GRAVES, JARED HOUSTON SR | 05-29-2025  | Yes                   | 19774461        |                        |
| BANK AFFILIATED | CE PERMANENT EXEMPTION   | DMV NUMBER  | CRIMINAL HISTORY DATE | RESIDENT STATES | DESIGNATED HOME STATES |
| No              | No                       |             |                       | Texas           |                        |

### CONTACT INFORMATION

Business Location (Effective Date: 05-29-2025)

7676 HILLMONT ST  
HOUSTON, TX 77040

Mailing (Effective Date: 05-29-2025)

[REDACTED]

### COMMUNICATION PREFERENCES

COMMUNICATION PREFERENCE COMMUNICATION PREFERENCE TYPE

Electronic Mail

### PHONE INFORMATION

PHONE TYPE PHONE NUMBER PHONE EXTENSION  
Business 832-834-0462

### LICENSES AND ACTIVE QUALIFICATIONS

| LICENSE TYPE   | LICENSE NUMBER | ORIGINAL ISSUE DATE | STATUS | EFFECTIVE DATE | EXPIRATION DATE | INACTIVATION REASON | CE COMPLIANCE |
|----------------|----------------|---------------------|--------|----------------|-----------------|---------------------|---------------|
| Escrow Officer | 2682184        | 06-14-2021          | Active | 05-29-2025     | 01-31-2027      |                     | No            |

### STATUS HISTORY

| STATUS   | BEGIN DATE | INACTIVATION REASON |
|----------|------------|---------------------|
| Inactive | 05-01-2025 | Failure to Renew    |
| Active   | 06-14-2021 |                     |

| LICENSE TYPE        | LICENSE NUMBER | ORIGINAL ISSUE DATE | STATUS   | EFFECTIVE DATE | EXPIRATION DATE | INACTIVATION REASON | CE COMPLIANCE |
|---------------------|----------------|---------------------|----------|----------------|-----------------|---------------------|---------------|
| General Lines Agent | 2619333        | 01-20-2021          | Inactive | 01-31-2023     | 01-31-2023      | Failure to Renew    | No            |

### STATUS HISTORY

| STATUS | BEGIN DATE | INACTIVATION REASON |
|--------|------------|---------------------|
| Active | 01-20-2021 |                     |

### QUALIFICATIONS

| QUALIFICATION TYPE           | LICENSE RESIDENCY | RESIDENCY DATE | ORIGINAL ISSUE DATE | STATUS   | EFFECTIVE DATE | RESIDENT EXPIRATION DATE | INACTIVATION REASON |
|------------------------------|-------------------|----------------|---------------------|----------|----------------|--------------------------|---------------------|
| Life, Accident, Health & HMO | Resident          | 01-20-2021     | 01-20-2021          | Inactive | 01-31-2023     |                          | Failure to Renew    |

### AFFILIATIONS

| COMPANY                                 | EIN        | NAIC ID | LICENSE NUMBER | STATUS   | EFFECTIVE DATE |
|---|------------|---------|----------------|----------|----------------|
| American General Life Insurance Company | 25-0598210 | 60488   | 2810<br>2810   | Inactive | 06-16-2022     |

| APPOINTMENT TYPE                | STATUS   | ACTIVE DATE | TERMINATION DATE | TERMINATION REASON |
|---------------------------------|----------|-------------|------------------|--------------------|
| Life Ins Not Exceeding \$25,000 | Inactive | 02-12-2021  | 06-16-2022       | Canceled           |
| Life, Accident, Health and HMO  | Inactive | 02-12-2021  | 06-16-2022       | Canceled           |

### FIRM ASSOCIATIONS

| EIN        | NAME                            | ASSOCIATION TYPE  | BEGIN DATE | END DATE | TERMINATION REASON |
|------------|---------------------------------|-------------------|------------|----------|--------------------|
| 86-3019705 | TEXAS FIRST TITLE PARTNERS, LLC | TA-Onsite Manager | 04-27-2022 |          |                    |
| 86-3019705 | TEXAS FIRST TITLE PARTNERS, LLC | TA-Member         | 06-14-2021 |          |                    |
| 86-3019705 | TEXAS FIRST TITLE PARTNERS, LLC | TA-Manager        | 06-14-2021 |          |                    |

# Individual Information Inquiry

# 2025-9377

Name: GRAVES, JARED HOUSTON

Display Results For: All Information

State Of: TEXAS

| EIN        | NAME                            | ASSOCIATION TYPE       | BEGIN DATE | END DATE | TERMINATION REASON |
|------------|---------------------------------|------------------------|------------|----------|--------------------|
| 86-3019705 | TEXAS FIRST TITLE PARTNERS, LLC | EO - Bonafide Employee | 06-14-2021 |          |                    |

### EXAM DETAILS

| EXAM DATE  | EXAM ID   | EXAM LEVEL    | EXAM RESULT | PORTION WAIVED | PRE-LICENSING VERIFIED DATE | PRE-LICENSING DOCUMENTATION |
|------------|-----------|---------------|-------------|----------------|-----------------------------|-----------------------------|
| 01-07-2021 | 388334967 | Gen Lines LAH | Passed      | No             |                             |                             |

### CONTINUING EDUCATION COMPLIANCE SUMMARY

| CE REVIEW DATE | TYPE OF CE     | COURSE WORK COMPLETE? | FEE PAID? | SATISFIED? |
|----------------|----------------|-----------------------|-----------|------------|
| 01-31-2027     | Escrow Officer | No                    |           | No         |

### CONTINUING EDUCATION COMPLIANCE

| LICENSE TYPE        | COMPLIANCE TYPE | REVIEW DATE | STATUS DATE | STATUS        |
|---------------------|-----------------|-------------|-------------|---------------|
| Escrow Officer      | Ethics Escrow   | 01-31-2027  | 05-29-2025  | Incomplete    |
| Escrow Officer      | Total Escrow    | 01-31-2027  | 05-29-2025  | Incomplete    |
| Escrow Officer      | Ethics Escrow   | 01-31-2025  | 05-01-2025  | Not Compliant |
| Escrow Officer      | Total Escrow    | 01-31-2025  | 03-20-2023  | Compliant     |
| General Lines Agent | Ethics          | 01-31-2023  | 03-20-2023  | Compliant     |
| Escrow Officer      | Ethics Escrow   | 01-31-2023  | 01-30-2023  | Compliant     |
| Escrow Officer      | Total Escrow    | 01-31-2023  | 01-30-2023  | Compliant     |
| General Lines Agent | Total General   | 01-31-2023  | 01-31-2023  | Not Compliant |

### LICENSES APPLICATIONS

| APPLICATION ID | APPLICATION TYPE | LICENSE TYPE               | RECEIVED DATE | LICENSE NUMBER | STATUS   | STATUS DATE |
|----------------|------------------|----------------------------|---------------|----------------|----------|-------------|
| 3563830        | Activate License | Escrow Officer             | 05-14-2025    | 2682184        | Approved | 05-29-2025  |
| 2333953        | New License      | Escrow Officer             | 04-30-2021    | 2682184        | Approved | 06-14-2021  |
| 2242653        | New License      | General Lines Agent/Agency | 01-11-2021    | 2619333        | Approved | 01-20-2021  |

# EXHIBITS 2-6

# CONFIDENTIAL