



**DEPARTMENT OF INSURANCE, FINANCIAL  
INSTITUTIONS AND PROFESSIONAL REGISTRATION**

P.O. Box 690, Jefferson City, Mo. 65102-0690

IN RE: COMMONWEALTH LAND TITLE  
INSURANCE COMPANY  
601 RIVERSIDE AVENUE  
JACKSONVILLE, FL 32204

TRACKING ID 318128

**VOLUNTARY FORFEITURE AGREEMENT**

It is hereby agreed by Commonwealth Land Title Insurance Company ("Commonwealth") and the Division of Consumer Affairs ("Division") of the Department of Insurance, Financial Institutions and Professional Registration, as follows:

WHEREAS, Chlora Lindley-Myers, is the duly appointed Director of the Department of Insurance, Financial Institutions and Professional Registration, State of Missouri (hereinafter, "Director" of the "Department"), whose duties, pursuant to Chapters 374, 375 and 381, RSMo, include the supervision and regulation of the business of insurance;

WHEREAS, the Division is charged with investigating producers and companies engaged in the business of insurance pursuant to Sections 374.085 and 374.190, RSMo and is authorized by the Director to recommend enforcement action under the laws

relating to insurance;

WHEREAS, Commonwealth currently holds a certificate of authority with the Department, pursuant to Chapter 375, RSMo;

WHEREAS, the Division has received information concerning Commonwealth's alleged failure to:

- Retain and provide evidence of the title search relied on to determine insurability in violation of Section 381.071.3, RSMo (2016);
- Timely respond to an inquiry by the Department in violation of 20 CSR 100-4.100;

Additionally, Commonwealth allegedly engaged in improper claim practices in violation of Section 375.1005, RSMo (2016) as defined by Section 375.1007 (2), (3), (4) , (7) and (11), RSMo (2016), and subjects Commonwealth to enforcement action by the Director;

WHEREAS, Commonwealth has been informed of its right to counsel and of its right to contest any attempt by the Department to discipline its certificate of authority, and states that it understands its rights to contest any such actions;

NOW, THEREFORE, in lieu of any recommendation or initiation by the Division of any action based on the violations cited in this Agreement, and after being afforded the opportunity to consult legal counsel, Commonwealth does hereby voluntarily and knowingly surrender and forfeit the sum of one thousand dollars (\$1,000.00), such sum to be paid into the State School Moneys Fund pursuant to Sections 374.046 and 374.280, RSMo.

Commonwealth shall submit this sum to the Department by cashier's check or money order made payable to the State School Moneys Fund no later than August 31,

2018.

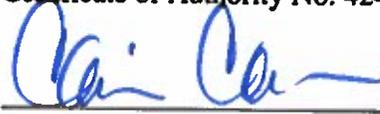
Commonwealth agrees that nothing in this Agreement shall preclude the Director or the Division from offering the Agreement with regard to any future allegations or a future violation by Commonwealth of this insurance laws or regulations, as evidence for the purpose of showing that:

- a) the acts described herein, together with such additional violations, form part of a conduct, a business practice, or other such series of similar violations; or
- b) that such additional violations are committed knowingly, intentionally or in conscious disregard of the law.

DATED: 8-30-18

  
Commonwealth Land Title Insurance  
Company  
By: Lewis Dunton, IV  
Its: Compliance & Regulatory  
Counsel  
Certificate of Authority No. 424061

DATED: 9/6/18

  
Carrie Couch, Director  
Division of Consumer Affairs

DATED: 10 September 2018

  
Chlora Lindley-Myers, Director  
Department of Insurance, Financial  
Institutions and Professional  
Registration