

BEFORE THE INSURANCE COMMISSIONER
FOR THE STATE OF ARKANSAS

IN THE MATTER OF
OLD REPUBLIC NATIONAL
TITLE INSURANCE COMPANY

A.I.D. NO. 2010- 053

CONSENT ORDER

On this day Jay Bradford, Arkansas Insurance Commissioner ("Commissioner"), and Old Republic National Title Insurance Company ("Old Republic"), NAIC #50520, have reached an agreement to resolve, without resort to an adjudicatory proceeding, Old Republic's alleged failure to comply with the requirements of the Arkansas Insurance Code as set forth herein. In this regard, the Commissioner and Old Republic agree as follows:

FINDINGS OF FACT

1. The Insurance Commissioner has jurisdiction over the parties and subject matter herein.
2. Old Republic is a title insurance company that holds a Certificate of Authority to do business in the State of Arkansas. Old Republic's address is 11960 Westline Industrial #230, St. Louis, Missouri 63146.
3. Old Republic has held a Certificate of Authority to do business in the State of Arkansas since June 11, 1952.

4. The Arkansas Insurance Department ("Department") acquired regulatory authority over title insurance agents on January 1, 2008 by Act 684 of 2007.

5. On or about February 5, 2010, the Department received information that Old Republic was issuing Closing Protection Letters through an unlicensed entity.

6. On February 12, 2009, the Department received a business run from Old Republic showing 251 Closing Protection Letters were issued by Old Republic since January 1, 2008, in violation of Ark. Code Ann. § 23-103-405(c)(2).

7. Upon further investigation, the Department found that Old Republic had issued an additional 1,147 Closing Protection Letters since January 1, 2008, in violation of Ark. Code Ann. § 23-103-405(c)(2).

CONCLUSIONS OF LAW

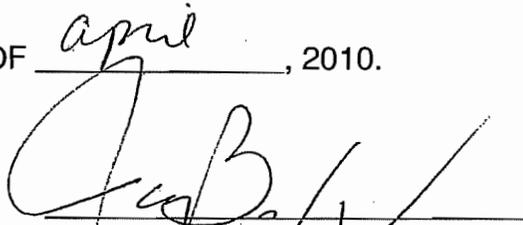
1. That the Commissioner has jurisdiction over the parties and over the subject matter herein pursuant to Ark. Code Ann. § 23-61-103.

2. That the Commissioner finds that Old Republic has violated Ark. Code Ann. § 23-103-405(c)(2). Under Ark. Code Ann. § 23-103-416, the Commissioner in his discretion may impose upon the insurer an administrative penalty in the amount of up to one thousand dollars (\$1,000) per violation or up to five thousand dollars (\$5,000) per violation if the insurer knew or reasonably should have known that the violation existed.

3. That Old Republic has been made aware of its right to a hearing and has voluntarily and intelligently waived said right and without any admission of wrongdoing consents to the entry of this Consent Order.

THEREFORE, in consideration of these Findings of Fact and Conclusions of Law, it is hereby ORDERED AND AGREED that pursuant to Ark. Code Ann. § 23-103-416, Old Republic National Title Insurance Company consents to this action and shall pay an administrative penalty of \$50,000. The administrative penalty shall be paid within 30 days from the entry of this Order.

IT IS SO ORDERED THIS 27th DAY OF April, 2010.



JAY BRADFORD
INSURANCE COMMISSIONER
STATE OF ARKANSAS



RONALD J. BLITENTHAL
VICE PRESIDENT AND
GOVERNMENTAL AFFAIRS COUNSEL
OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY