

**BEFORE THE INSURANCE COMMISSIONER OF THE  
STATE OF OKLAHOMA**

**FILED**

**OCT 13 2021**

**INSURANCE COMMISSIONER  
OKLAHOMA**

STATE OF OKLAHOMA, ex rel. GLEN  
MULREADY, Insurance Commissioner,

Petitioner,

v.

AMERICAN EAGLE TITLE INSURANCE  
COMPANY, a licensed insurance company in  
the State of Oklahoma,

Respondent.

Case No. 21-0522-DIS

**CONDITIONAL ADMINISTRATIVE ORDER  
AND NOTICE OF RIGHT TO BE HEARD**

**COMES NOW** the State of Oklahoma, ex rel. Glen Mulready, Insurance Commissioner,  
by and through his attorney, Teresa L. Green, and alleges and states as follows:

**JURISDICTION**

1. Glen Mulready is the Insurance Commissioner of the State of Oklahoma and, as such, is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, *36 O.S. §§ 101 et seq.*, including *36 O.S. §§ 309.1 through 309.7*.

2. The Company is an Oklahoma domestic insurer authorized to transact the following lines of insurance business: title. The Company operates in the State of Oklahoma pursuant to SBS Company Number 44194892 and NAIC Company Code number 50001.

**FINDINGS OF FACT**

3. On or about June 30, 2021, the Oklahoma Insurance Department issued Order Adopting Report of Examination which ordered Respondent to “file within thirty (30) days...affidavits executed by each of its directors stating under oath that each director has received a copy of the adopted Report [of Financial Examination] and the related Order.”

4. On or about October 5, 2021, the Oklahoma Insurance Department received the Respondent's affidavits.

5. Pursuant to 36 O.S. § 309.4(D)(1), the company shall file affidavits executed by each of its directors stating under oath that they have received a copy of the adopted report and related orders within thirty (30) days of the issuance of the adopted report.

6. The Insurance Commissioner may fine any insurer who knowingly and willfully violates the Oklahoma Insurance Code with a civil penalty of not more than \$5,000.00 for each occurrence. See 36 O.S. § 619(B).

### **CONCLUSIONS OF LAW**

7. Respondent violated 36 O.S. § 309.4(D)(1) by not filing affidavits executed by each of its directors stating under oath that they have received a copy of the adopted report and related orders within thirty (30) days of the issuance of the adopted report when the affidavits were received on October 5, 2021 and the order was issued on June 30, 2021.

### **ORDER**

**IT IS THEREFORE ORDERED, ADJUDGED AND DECREED** by the Insurance Commissioner, subject to the following paragraph, that the Respondent violated 36 O.S. § 309.4(D)(1) and as a result **Respondent is FINED** in the amount of **ONE HUNDRED DOLLARS (\$100.00)**. **The Fine is to be paid within thirty (30) days of receipt of this Order.**

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** by the Insurance Commissioner that this Order is a Conditional Order. Unless the Respondent requests a hearing with respect to the Findings of Fact set forth above within thirty (30) days of the date of mailing of this Order, this Order and the penalties set forth above will become a Final Order on the thirty-first (31<sup>st</sup>) day following the date of mailing this Order. A request for hearing should be in writing addressed to Teresa L. Green, Oklahoma Insurance Department, Legal Division, 400 N.E. 50<sup>th</sup>

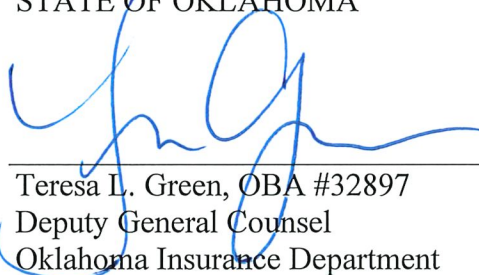
Street, Oklahoma City, Oklahoma 73105. The request for hearing must state the grounds for the request to set aside or modify the Order.

Any such hearing will be conducted according to the procedures for contested cases under the Insurance Code and 75 O.S. § 250-323. If the Respondent serves a timely request for hearing on the Oklahoma Insurance Department, this Conditional Order will act as notice of the matters to be reviewed at the hearing, and the Findings of Fact, Conclusions of Law, and penalties imposed in this Conditional Order will be considered withdrawn, pending final resolution at the hearing.

**WITNESS** My Hand and Official Seal this 13<sup>th</sup> day of October, 2021.



GLEN MULREADY  
INSURANCE COMMISSIONER  
STATE OF OKLAHOMA



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Teresa L. Green, OBA #32897  
Deputy General Counsel  
Oklahoma Insurance Department  
400 N.E. 50<sup>th</sup> St.  
Oklahoma City, OK 73105  
Telephone: (405) 521-6654  
Facsimile: (405) 522-0125

**CERTIFICATE OF MAILING**

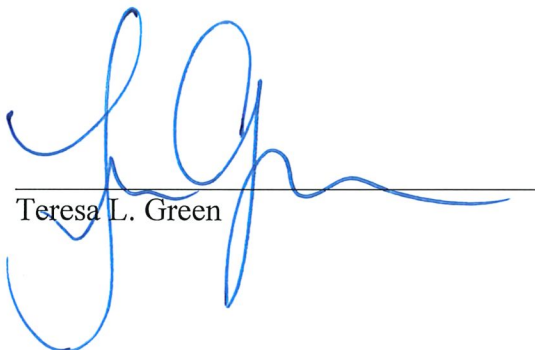
I, Teresa L. Green, hereby certify that a true and correct copy of the above foregoing *Conditional Administrative Order and Notice of Right to be Heard* was mailed by certified mail, with postage prepaid and return receipt requested, on this 13<sup>th</sup> day of October, 2021 to:

Eric R. Offen, President  
American Eagle Title Insurance Company  
421 NW 13<sup>th</sup> St., Suite 320  
Oklahoma City, OK 73103

**CERTIFIED MAIL NO. 9214 8902 0982 7500 0413 39**

and that a copy was delivered to:

Financial Division

  
\_\_\_\_\_  
Teresa L. Green

Date Produced: 10/18/2021

OKLAHOMA INSURANCE DEPARTMENT:

The following is the delivery information for Certified Mail™/RRE item number 9214 8902 0982 7500 0413 39. Our records indicate that this item was delivered on 10/14/2021 at 10:17 a.m. in OKLAHOMA CITY, OK 73103. The scanned image of the recipient information is provided below.

Signature of Recipient :



Address of Recipient :



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,  
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

This USPS proof of delivery is linked to the customers mail piece information on file as shown below:

ERIC R OFFEN PRESIDENT  
AMERICAN EAGLE TITLE INSURANCE COMPANY  
STE 320  
421 NW 13TH ST  
OKLAHOMA CITY OK 73103-3743

Customer Reference Number: C2995513.17298000

Return Reference Number sms/21-0522-DIS (TLG)/Cond Ord.

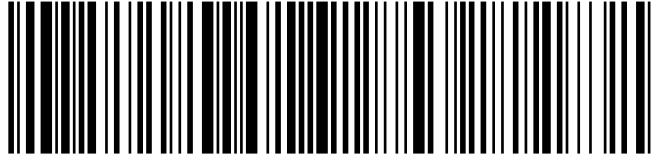
**Return address:**

OKLAHOMA INSURANCE DEPARTMENT  
5 CORPORATE PLAZA  
OKLAHOMA CITY, OK 73112

**Recipient address:**

ERIC R OFFEN PRESIDENT  
AMERICAN EAGLE TITLE INSURANCE COMPANY  
STE 320  
421 NW 13TH ST  
OKLAHOMA CITY OK 73103-3743

MAILING DATE: 10/13/2021  
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DELIVERED FRONT DESK/RECEPTION/MAIL ROOM	OKLAHOMA CITY,OK 73103	10/14/2021 10:17

CASE NUMBER: 21-0522-DIS

DEPARTMENT: LEGAL/TLG

SENDER: SMS

CUSTOM 4: CONDITIONAL ADMINISTRATIVE ORDER & NOTICE OF RIGHT TO BE HEARD