

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

CAUSE NUMBER: 16386-AG17-0912-168

IN THE MATTER OF: )

WFG Lender Services LLC )  
3211 Internet Blvd., Suite 100 )  
Frisco, TX 75034 )

Respondent. )

Type of Agency Action: Enforcement )

Indiana Producer License No.: 520420 )

**FILED**

OCT 20 2017

STATE OF INDIANA  
DEPT. OF INSURANCE

AGREED ENTRY

This Agreed Entry is executed by the Indiana Department of Insurance ("Department"), by counsel, Claire Szpara, and WFG Lender Services LLC ("Respondent"), a title insurance agency licensed to do business in Indiana, to resolve all issues in the above captioned matter. This Agreed Entry is subject to the review and approval of Stephen W. Robertson, Commissioner, Indiana Department of Insurance ("Commissioner").

WHEREAS, Respondent is a non-resident title insurance agency licensed in the state of Indiana, holding license number 520420;

WHEREAS, Indiana Code § 6-1.1-12-43(e)(1) requires that title producers enter information into the RREAL IN database as soon as possible after the closing;

WHEREAS, the Department has interpreted this to be twenty (20) business days;

WHEREAS, the Respondent failed to enter four hundred and eight (408) real estate transactions into the RREAL IN database within the interpreted time period;

WHEREAS, Dan Bailey, Executive Vice President of WFG Lender Services LLC, is authorized to act on behalf of Respondent and obligate it to perform in accordance with this agreement; and

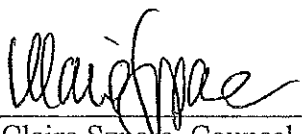
WHEREAS, the Department and Respondent (collectively, "the Parties") desire to resolve their differences and settle their issues without incurring the time and expense of a hearing.

IT IS, THEREFORE, NOW AGREED by and between the Parties as follows:

1. The Commissioner has jurisdiction over the subject matter and the Parties in this Agreed Entry.
2. This Agreed Entry is executed voluntarily by the Parties.
3. Respondent voluntarily and freely waives the right to a public hearing in this matter.
4. Respondent voluntarily and freely waives the right to judicial review of this matter.
5. Respondent agrees to pay an administrative penalty in the amount of four thousand five hundred and eighty dollars (\$4,580) to the Department within thirty (30) days of the Commissioner's Final Order adopting this Agreed Entry.
6. The Department agrees to accept Respondent's compliance with the Agreed Entry herein as full satisfaction of this matter.
7. Respondent has carefully read and examined this Agreed Entry and fully understands its terms.

8. Respondent has entered into this Agreed Entry freely, and has not been subject to duress, threat or undue influence.
9. Should this Agreed Entry not be accepted by the Commissioner, it is agreed that presentation to and consideration of this Agreed Entry by the Commissioner shall not unfairly or illegally prejudice the Commissioner from further participation in or resolution of these proceedings.
10. Respondent is aware that failure to comply with any term of this agreement will result in the matter being set for hearing.

10-17-17  
Date Signed

  
\_\_\_\_\_  
Claire Szpala, Counsel (34219-64)  
Indiana Department of Insurance

10/3/2017  
Date Signed

  
\_\_\_\_\_  
Dan Bailey, Executive Vice President  
WFG Lender Services LLC

STATE OF TEXAS            )  
  ) SS:  
COUNTY OF \_\_\_\_\_)

Before me a Notary Public for \_\_\_\_\_ County, State of Texas,  
personally appeared Dan Bailey, on behalf of WFG Lender Services LLC., and being first  
duly sworn by me upon his oath, says that the facts alleged in the foregoing instrument are  
true.

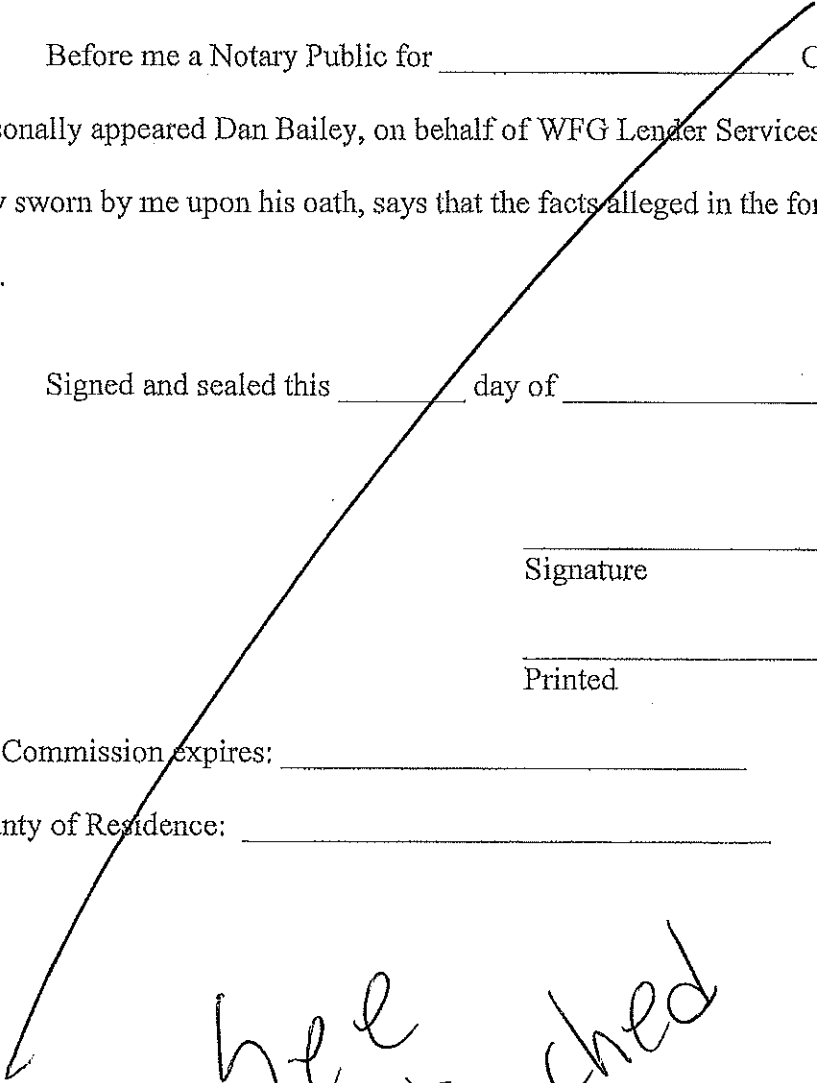
Signed and sealed this \_\_\_\_\_ day of \_\_\_\_\_, 2017.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed

My Commission expires: \_\_\_\_\_

County of Residence: \_\_\_\_\_



See  
Attached

**CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**

**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )  
County of Ventura )  
On October 3, 2017 before me, Marilyn Montaperto, Notary Public  
Date Here Insert Name and Title of the Officer  
personally appeared Daniel J Bailey  
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Marilyn Montaperto  
Signature of Notary Public

Place Notary Seal Above

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_  
Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_  
Signer(s) Other Than Named Above: \_\_\_\_\_

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: \_\_\_\_\_  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Individual  Attorney in Fact  
 Trustee  Guardian or Conservator  
 Other: \_\_\_\_\_  
Signer Is Representing: \_\_\_\_\_

Signer's Name: \_\_\_\_\_  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
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**FINAL ORDER**

The Indiana Department of Insurance (“Department”), by its counsel, Claire Szpara, and WFG Lender Services LLC (“Respondent”), a non-resident licensed title insurance agency, signed an Agreed Entry which purports to resolve all issues involved in the action by the Department and which has been submitted to the Commissioner of Insurance (“Commissioner”) for approval.

The Commissioner, after reviewing the Agreed Entry, finds it has been entered into fairly and without fraud, duress or undue influence, and is fair and equitable between the parties. The Commissioner hereby incorporates the Agreed Entry as if fully set forth herein, and approves and adopts in full the Agreed Entry as a resolution of this matter.

IT IS THEREFORE ORDERED by the Commissioner:

1. Respondent shall pay an administrative penalty in the amount of four thousand five hundred and eighty dollars (\$4,580) to the Department, in aggregate, for failure to input four hundred and eight (408) real estate transactions into the RREAL IN database within the required time period. This amount is due in full within thirty (30) days after the signing of this Final Order.

ALL OF WHICH IS ORDERED this 20<sup>th</sup> day of October, 2017.

  
\_\_\_\_\_  
Stephen W. Robertson, Commissioner  
Indiana Department of Insurance

Distribution:

WFG Lender Services LLC.  
3211 Internet Blvd., Suite 100  
Frisco, TX 75034

Claire Szpara, Attorney  
Indiana Department of Insurance  
311 W. Washington St., Suite 103  
Indianapolis, IN 46204