



Dora
Department of Regulatory Agencies

Division of Insurance
Marcy Morrison
Commissioner of Insurance

Bill Ritter, Jr.
Governor

D. Rico Munn
Executive
Director

March 17, 2009

«Fname» «Lname» or Responsible Producer
«ORG_NAME»
«Add_Line_1»
«Add_Line_2»
«City», «St» «Zip»

Re: Remuneration and Marketing Activities

Dear «Fname» «Lname» or Responsible Producer,

Recently, there has been an increase in the number of industry and consumer inquiries to the Colorado Division of Insurance ("Division") regarding alleged illegal marketing practices and remuneration. In response, the Division is conducting an informal investigation into the accounts of all licensed title agencies. **Please submit detailed responses to the attached questions no later than April 16, 2009.**

The responsible producer of the agency must attest to the accuracy of the responses and sign the responses. Colorado Insurance Regulation 1-1-8 requires that every person shall provide a complete response in writing to any inquiry from the Division of Insurance. This reply must be postmarked by April 16, 2009 which is within thirty [30] calendar days from the date of this correspondence. If additional time is required to provide a complete response, including any documentation which is requested, a request for an extension of time must be made in writing prior to April 16, 2009.

The request for an extension of time must state the reason for such request and the number of additional days required to provide a complete response. Requests for additional time will be granted for good cause shown and for a reasonable period at the discretion of the Division. Requests for an extension of time may be transmitted by facsimile or email.

Failure to provide a full or complete response, or to request an extension for a specified period, may result in the imposition of a \$500 fine under Colorado Insurance Regulation 1-1-8 and applicable surcharge pursuant to §24-34-108(2), C.R.S. This surcharge will be used to fund the development, implementation and maintenance of a consumer outreach and education program. Pursuant to Section 6 of Colorado Insurance Regulation 1-1-8, and after notice and hearing, additional sanctions may be sought under §10-1-215, C.R.S. and other fining and penalty provisions of Title 10.

«ORG_NAME»

March 16, 2009

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Please note that in accordance with § 10-1-205(8), C.R.S., all working papers, claim files, recorded information, and documents disclosed to the Division will be given confidential treatment until the informal investigation is concluded. If documentation submitted to the Division is additionally protected from disclosure under the exceptions to the Colorado Open Records Act of § 24-72-204 (3) (a) (iv), C.R.S., you must clearly mark each such document as confidential. In addition, **you must submit an index of the documents** that describes the content of each document, the basis for the claim of confidentiality, and the supporting rationale for the claim (a privilege or confidentiality index) This index **must** accompany the documentation.

Please direct any inquiries concerning the above questions to: Andy Helm,
DOI.Compliance@dora.state.co.us or (303) 894-2194.

I appreciate your prompt and complete response to this letter. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Helm', written over a horizontal line.

Andy Helm
Title Insurance Analyst
Compliance and Investigations
Colorado Division of Insurance
303-894-2194

Please submit detailed responses to the following items no later than April 16, 2009:

1. Please provide a listing of each bank account in use by «ORG_NAME» during calendar year 2008, including but not limited to operating and trust/escrow accounts. For each account, include the name of the financial institution, contact information of the financial institution, account name, and account number.
2. For each account listed, provide a complete record of any and all disbursements or debits from the account during calendar year 2008. Each record shall include at a minimum: disbursement date, check or transaction number, payee, and amount paid.

NOTE: Digital or electronic responses are acceptable. If you would like to e-mail your response, please use the following e-mail address: DOI.Compliance@dora.state.co.us

Please fill out the following attestation, sign, and include with your responses:

Agency Name (as licensed): _____

Agency License Number: _____

Mailing Street Address: _____

City: _____

State: _____

Zip Code: _____

Date: _____

As the responsible producer of «ORG_NAME» and the individual to whom this letter is addressed, who is authorized to sign on behalf of the company, I do hereby attest to the accuracy of the above responses.

Signature: _____

Printed Name: _____

Title: _____

Telephone Number: _____

E-mail Address: _____

We are seeking Colorado specific information only. Responses provided should only include accounts in which monies related to Colorado transactions are held. If you are unable to provide Colorado-specific information please provide a detailed explanation of what other states are included in your figures as well as the approximate percentage that reflects Colorado transactions.