

Events - title insurance inducements rules

1. I work for or represent a title company and I was invited to golf with some clients. My principal or employer will cover my greens fees, but won't pay for the real estate agents. May I go?

Yes. This is specifically allowed in the rules. See WAC 284-29-255(4) and 284-29-205(13) (leg.wa.gov) for details.

2. A real estate training company is putting on a seminar for about 150 to 200 local attendees. They've asked local businesses, including a local title company's office, to hand out free tickets to local mortgage and real estate companies. Is this allowed under the title rules?

No. Title companies cannot provide non-title services to real estate agents without charging for those services. Providing free tickets to real estate agents by leaving them on a title company's counter is also not allowed under the rules. Also, using title company employees to hand out tickets violates the rules. See WAC 284-29-255(1) (leg.wa.gov) for details.

3. I am a representative or employee of a title company. Under the new rules, may I be a member of a networking group that includes business owners, producers, and representatives or employees of a title company?

Yes. This is allowed in the rules. See WAC 284-29-255(4) (leg.wa.gov) for details.

4. I work for a title company. I'm currently serving on an association committee for producers of title insurance business. The association meets once a month, usually at a restaurant. However, we will hold our next meeting at a location where members have been asked to bring a dish. May I participate in the potluck meeting?

Yes, a title company employee may attend activities and business meetings of producers under the conditions outlined in the rules. See WAC 284-29-255(4) (leg.wa.gov) for details.

5. Our title company is having a retirement party at a local country club for a longtime employee. We plan to serve hors d'oeuvre with beer and wine. May we invite some producers who have known and worked with the retiree for many years?

No. There are no exceptions to the rules for giving a thing of value to a producer for this type of gathering. WAC 284-29-230(3) (leg.wa.gov) defines "meal" to include receptions and cocktail parties. WAC 284-29-230(1)(b) (leg.wa.gov) defines that a business meal on behalf of anyone must include a substantial and substantive title insurance business discussion directly before, during, or after the business meal. It's unlikely that this type of discussion would occur at a retirement party. Even if the title company considers the party a "self-promotional" function under WAC 284-29-205(11) (leg.wa.gov) rather than a business meal, the function would have to be open to all producers and be held at the title company's usual place of business under WAC 284-29-230(5)(a) (leg.wa.gov).

6. If invited to a lender's function, can a title company attend and advertise its services?

Yes, but only if the title company is attending and advising about its services. It cannot sponsor or pay for, or subsidize the function in any manner. See WAC 284-29-260(1)(a), (2) (leg.wa.gov) for details.

7. A title company may provide a speaker at an educational program when the topic of the presentation is solely related to title insurance, escrow, or title to real property. In addition, a title company may sponsor a trade association event. Can a title company provide a speaker at a trade association event that it is sponsoring if the topic of the presentation is not limited to title insurance, escrow, or title to real property?

Yes. A title company can provide a speaker at a trade association event and the topic of the presentation may be related to subjects other than title insurance, escrow, or title to real property if the title company complies with the requirements related to sponsoring a trade association event. See WAC 284-29-220 and 284-29-235 (leg.wa.gov) for details.

Updated 02/05/2016

SEE ALSO

| Title insurance

| P&C, life, disability & title company admissions

NEED MORE HELP?

Call 360-725-7144, 8 a.m. to 5 p.m., Monday - Friday

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11/13/08



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"The Voice of Real Estate in Snohomish County"

Office of Insurance Commissioner
PO Box 40258
Olympia, WA 98504-0258

RE: Chapter 284-29 WAC
Title Insurance- Giving Things of Value to Title Producers Rule
Draft 11/7/2008

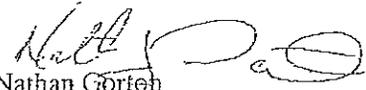
Insurance Commissioner Kreidler,

Thank you for the opportunity to submit comments in writing regarding the above-mentioned draft. While this draft has addressed a few of our minor concerns, two compelling problems still remain.

1. Including "Trade Associations" under this legislation makes it seem as though the role of trade associations in the market place is still misunderstood. This legislation seeks to regulate "any person in a position to influence the referral of title business to the title company" (284-29 sub1). We believe that trade associations are not in a position to do that and should not be treated as such. There are over 30 local REALTOR® associations in Washington State. We do not act as interested parties in the referral of business. We exist to educate our members and keep them up to date regarding products, including title insurance, that is available to the consumer in our marketplace. We in no way take a position on which products to use. We are no more a position to "influence the referral of title business" as a Chamber of Commerce would be if a Title Company were a member. It is this basic misunderstanding of the role of 501 (c)(6) nonprofits that drive much of our frustration over this process.
2. Title Companies should be allowed to act as education sponsors with trade associations regardless of the subject being taught, and without a cap on monies allowed. Local Associations work hard to ensure that their members remain professional, educated and up to date. It is one of our primary functions. This emphasis is beneficial not just to our members, and affiliates, but the general public as well. A more educated and professional real estate licensee should be encouraged by the OIC, not hampered. By allowing title companies to sponsor and participate fully in the education seminars of trade associations we are achieving an end result that is beneficial to consumers. The State of Idaho's education exemption shows clearly how this can work. While this draft does allow some education event sponsorship, a true exemption is preferable not just for local associations and our agents, but the general public as well. Please consider an education exemption, regardless of the subject being taught, in the same way that Idaho allows.

Again we appreciate your consideration of our comments.

Sincerely,


Nathan Gorten
Washington Association Executive Chair

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EXHIBIT FA-2

First American Title Ins. Co.
Docket No. 15-0166
Exh. 02



From: Matthew Wahlquist [<mailto:matthew@sccar.com>]
Sent: Wednesday, January 29, 2014 11:27 AM
To: Christensen, Sara
Subject: SCCAR Partnership

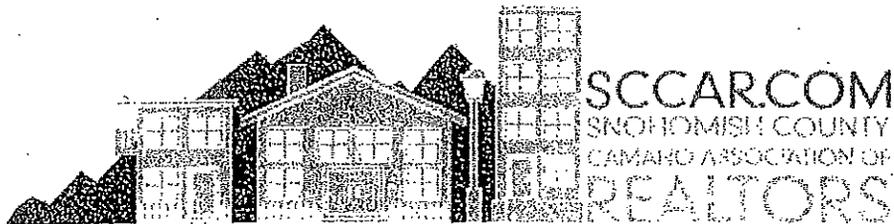
Sara,

I hope you and your team are having a great week. I am curious to know if you are planning to host another Market Update with Zillow for 2014. We really appreciated the opportunity to partner with your team and would love to participate in the event for 2014. Let me know your thoughts. I look forward to hearing from you.

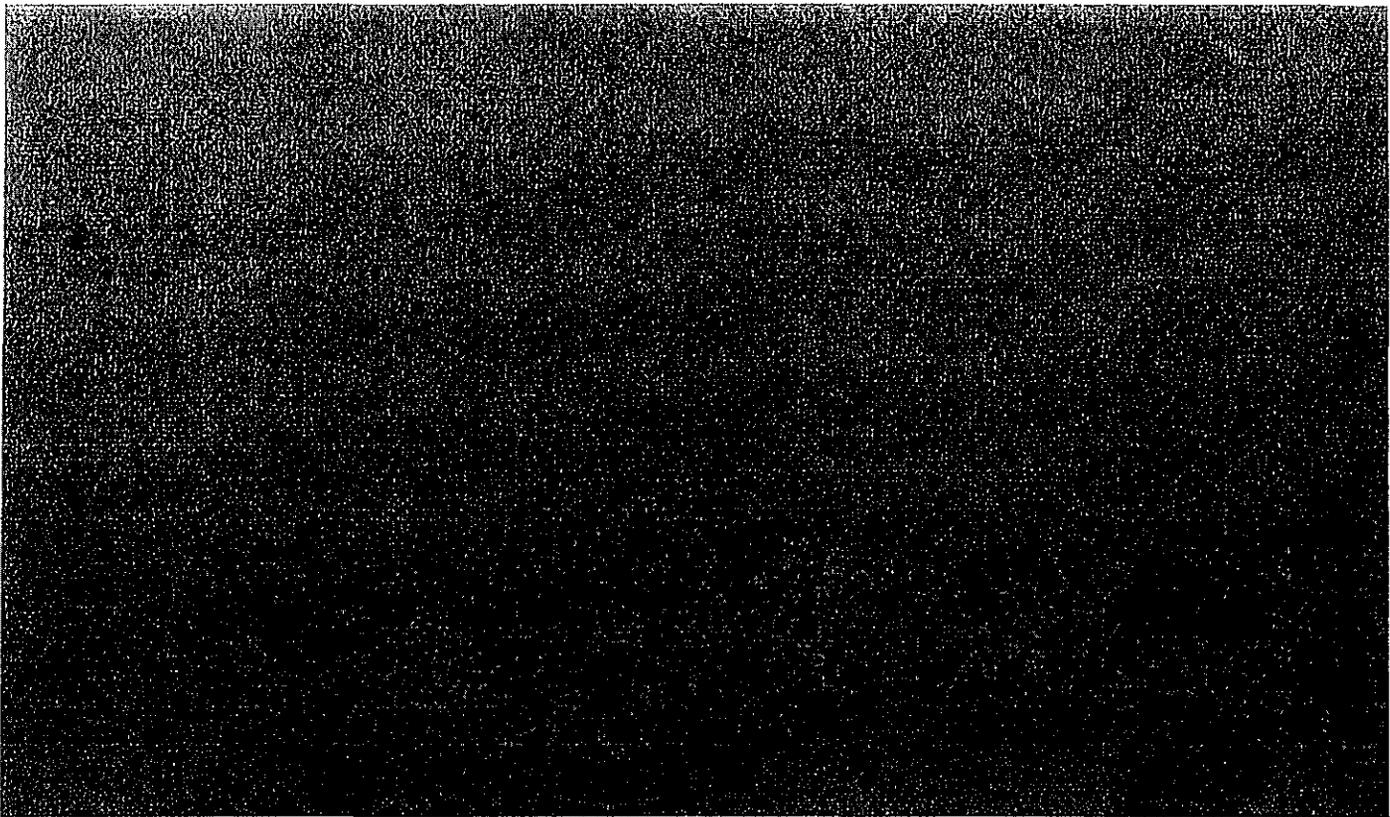
Have a wonderful day.

Matthew Wahlquist
Executive Director
Snohomish County-Camano
Association of REALTORS®
(425) 339-1388
Matthew@SCCAR.com

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From: Conrad, Sari-Kim
Sent: Tuesday, March 08, 2016 3:03 PM
To: Sager, Matthew
Subject: Fwd: 14284 2015 Economic Forecast

Sari Conrad
Operations Advisor, Direct Division
206-200-0797
Sent from my iPhone

Begin forwarded message:

From: "Conrad, Sari-Kim" <sconrad@firstam.com>
Date: March 8, 2016 at 11:13:37 AM PST
To: "Conrad, Sari-Kim" <sconrad@firstam.com>
Subject: Fwd: 14284 2015 Economic Forecast

Begin forwarded message:

From: "Christensen, Sara" <SChristensen@firstam.com>
Date: July 31, 2014 at 8:50:15 AM PDT
To: "Conrad, Sari-Kim" <sconrad@firstam.com>
Subject: Re: 14284 2015 Economic Forecast

This message has been archived.
\$875 actually

Sara Christensen
Vice President
Sales Manager
First American Title
Schristensen@firstam.com
206.947.6754

Sent from my iPhone

On Jul 31, 2014, at 8:37 AM, "Conrad, Sari-Kim" <sconrad@firstam.com> wrote:

Hi Sara!

Just to confirm, we are just paying \$1000 for this sponsorship? I recall some of this from last year, but I don't remember how it was structured.

Thank you!!

Sari-kim C
Attachments:

[image001.png](#)

(12 KB)

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FAFLD



From: Conrad, Sari-Kim
Sent: Tuesday, March 08, 2016 3:02 PM
To: Sager, Matthew
Subject: Fwd: 14284 2015 Economic Forecast

Sari Conrad
Operations Advisor, Direct Division
206-200-0797
Sent from my iPhone

Begin forwarded message:

From: "Conrad, Sari-Kim" <sconrad@firstam.com>
Date: March 8, 2016 at 11:10:25 AM PST
To: "Conrad, Sari-Kim" <sconrad@firstam.com>
Subject: Fwd: 14284 2015 Economic Forecast

Begin forwarded message:

From: TISW-RA-AZ-MAR-4079 Marketing <marketing.direct@firstam.com>
Date: July 31, 2014 at 8:00:20 AM PDT
To: "Conrad, Sari-Kim" <sconrad@firstam.com>
Subject: FW: 14284 2015 Economic Forecast

This message has been archived.

Hi Sari – can you please review the attached and let me know if we are ok to proceed? Looks like this event was held last year as well.

Juliet Taylor
Content Manager – Direct Division Marketing

First American Title
9000 East Pima Center Parkway

Scottsdale, AZ 85258

Direct: 602.685.7507
Mobile: 602.621.3648
Email: jwtaylor@firstam.com

Marketing Website: <http://print.firstam.com> <<http://print.firstam.com/>>

A member of the First American Financial Co
Attachments:

[image001.png](#)

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Thank you.~

FAFLD

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Enjoyed hearing about 2015 Economic projections with over 200 of our clients. This Team did an outstanding job and we had a very successful eve

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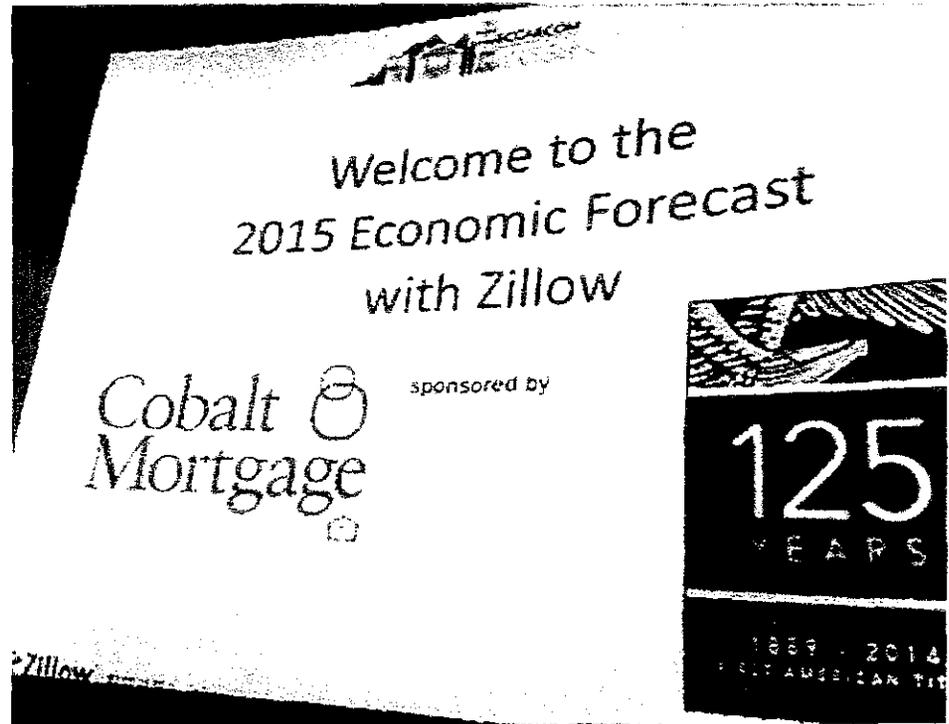


EXHIBIT FA-5

First American Title Ins. Co.
Docket No. 15-0166
Exh. 05