



First American
Title Insurance Company

April 2, 2015

Barry Walden
Senior Investigator
Legal Affairs Division
Office of Insurance Commissioner
P.O. Box 40256
Olympia, WA 98504-0256

RE: OIC Case #1229571

Dear Mr. Walden,

This letter serves as First American Title Insurance Company's ("First American") response to your letter dated March 5, 2015 that was addressed to me. First American previously responded to an inquiry from Fritz Denzer on this matter. Some of the questions you have asked were addressed in our prior response. A copy of our response to Fritz Denzer together with the documents that accompanied our response are being provided for your convenience.

First American answers the questions raised in your letter as follows:

1. Please explain who initiated the "Economic Forecast" presentation.

As First American has a relationship with Snohomish County Camino Association of Realtors ("SCCAR"), an employee of First American had a discussion with SCCAR exploring the option of sponsoring a trade association seminar.

2. Please explain how many events like this has [First American] coordinated in the last two years.

First American responds by stating that the question asked is vague and unclear. Additionally, the question asked is potentially duplicative of other questions asked. As such, it is believed that the response to this question is adequately addressed in First American's responses herein. First American responds by stating that it sponsored a trade association education seminar with SCCAR in 2013 in addition to the SCCAR education seminar held in 2014 which is the subject of your inquiry.

3. Please explain the nature of the presentation "Economic Forecast."

As demonstrated in the associated flyer, the Economic Forecast is intended to provide information relative to the real estate market by explaining current market conditions and what can be expected within the upcoming year based on economic forecasts.

4. Please explain how this presentation subject matter complies with WAC 284-29-235.

The Economic Forecast class was a trade association education seminar that was sponsored, in part, by First American. As such, WAC 284-29-235(3) does not place a restriction or limitation on the subject matter of a trade association education seminar sponsored by a title company. The Washington State Office of the Insurance Commissioner has addressed this very issue in its online "FAQ's" section and provided its explanation of the statute as it applies to the subject matter of a trade association education seminar. In referring to WAC 284-29-235 and WAC 284-29-220, the response was provided that "[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

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EXHIBIT FA-116

First American Title Ins. Co.
Docket No. 15-0166
Exh. 16

title company complies with the requirements related to sponsoring a trade association event.” <http://www.insurance.wa.gov/for-producers/title-insurance/inducement-rules/events/> (as updated on 12/10/2014) (emphasis added).

First American accordingly responds by stating that the Economic Forecast seminar was a trade association education seminar and as such, WAC 284-29-235(3) does not place a limitation or restriction on the subject matter that is presented.

5. Please explain how much payedpaid [sic] to rent the Lowes Cineplex in Lynwood, Washington.

The cost for renting the Lowes complex for the trade association education seminar was \$875.

6. Please explain how many hours [First American] spend [sic] coordinating the event.

A First American marketing representative contributed no more than 2.5 hours related to the trade association education seminar. An individual in the marketing department who assisted in creating the flyer spent no more than 20 minutes.

7. Please explain what database [First American] used to send flyers.

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8. Please explain who authorized [First American] to place the SCCAR logo on the flyer.

SCCAR has previously provided our marketing representative their logo to market the economic forecast education seminar. There were discussions with SCCAR regarding the use of the logo in the flyer. As the flyer was used for SCCAR’s distribution, SCCAR sent the flyer to their members and posted the flyer on their website which use and distribution of the flyer further demonstrates their acceptance, approval and authorization.

9. Please explain why the SCCAR logo is at the top of the flyer.

The logo is provided at the top of the flyer to clearly identify the trade association.

10. Please explain how this complies with WAC 284-29-260(1)(a) and RCW 48.29.210(2).

First American responds by stating that the question asked is vague and does not properly reference the statutes and regulations at issue. WAC 284-29-29-260(1) expressly permits those activities, sponsorships, donations, contributions and educations seminars, among other matters, that are provided for in WAC 284-29-200 through 284-29-255. Sponsorship of a trade association education seminar is expressly permitted by WAC 284-29-220(5) and WAC 284-29-235(3). Accordingly, First American’s sponsorship of the SCCAR education seminar is in compliance WAC 284-29-260 as it is permitted based on the provisions of WAC 284-29-220(5) and WAC 284-29-235(3).

RCW 48.29.210 does not apply to the sponsorship of a trade association education seminar. Given that a sponsorship is expressly permitted by statute, it could not then be deemed as prohibited under the general restrictions found in RCW 48-29.210(2).

11. Please explain the purpose of attendees RSVP to cs.snoco@firstam.com.

The cs.snoco@firstam.com email was used as a matter of convenience and ability to track and monitor attendees. First American sponsored the education seminar and wanted to see how well the event would be attended.

12. Please explain how many producers of title insurance business signed up for the event.

As shown in the list that was previously provided in response to our letter to Fritz Denzer, there was a total of 227 realtors and 43 affiliate members that signed up for the education seminar.

13. Please explain if you requested a donation of the attendees.

First American did not request a donation of attendees.

First American responds to your requests for documents as follows:

1. A copy of the rental agreement between Lowes Cineplex and [First American].

A copy of the invoice from Lowes for the education seminar is being provided with this letter.

2. A copy of email [sic] between yourself and any SCCAR representatives.

First American responds by stating that the request for documents is overly broad and unduly burdensome in that the request does not specify a time period and is not limited to matters pertaining to the education seminar which is the subject of the investigation. First American further responds by stating that the information and documents requested are not necessary to demonstrate compliance with WAC 284-29-200 through 284-29-265. First American response is that there are no emails between me and any SCCAR representative. Although your request is directed to me and not First American, First American will provide the emails it is able to locate between its marketing representative and SCCAR relating to the education seminar.

3. A copy of email [sic] between you and Cobalt Mortgage.

First American responds by stating that the request for documents is overly broad, unduly burdensome and is not limited in scope. First American further responds that documents and information requested are not necessary to demonstrate compliance with WAC 284-29-200 through 284-29-265. First American's response is that there are no emails between me and Cobalt Mortgage. Although your request is directed to me and not First American, First American responds by stating that it is not currently able to locate emails to and from Cobalt Mortgage and other employees of First American as emails are automatically archived and deleted from a user's account. First American would emphasize that emails with Cobalt Mortgage are not necessary to show compliance (or even noncompliance) with WAC 284-29-220 and WAC 284-29-235. Based on discussions with its employees, First American was able to discover that communications with Cobalt Mortgage regarding the education seminar at issue were primarily discussing the type of menu Cobalt Mortgage should provide for its sponsorship of the education seminar. If you consider these emails to be an important part of the investigation, First American will, upon your request, coordinate with its IT department to attempt to locate these emails.

4. A copy of the flyer you sent to your customers.

A copy of the flyer announcing the 2015 Economics Forecast education seminar that was provided to SCCAR for their distribution is being provided with this letter.

5. A copy of the list of attendees to the October 16, 2014 event.

A copy of the list of attendees was previously provided by First American to Fritz Denzer. The list of attendees to the October 16 education seminar is also being provided with this letter.

6. An Excel spreadsheet with the name, date, address, group, rental receipts, catering bills and the name of the presenter for each event that [First American] organized or sponsored in Washington State from March 2013 to March 2015.

First American responds by stating that the request for documents is overly broad and unduly burdensome. Additionally, the request goes beyond the scope of this investigation. This investigation pertains to a trade association education seminar. The request for documents, however, is now requiring documents related to all events and as such, First American is concerned that the request is not limited in scope and confuses the issue at hand. Moreover, this request may cause confusion regarding the difference between a trade association event and a trade association education seminar. First American will provide what it is able to locate regarding events that it has sponsored with a trade association from March 2013 to March 2015.

7. Copies of flyers created to advertise the events.

First American responds by stating that the request for documents is overly broad, unduly burdensome and is not limited in scope. First American will provide the flyers used to advertise the events identified in response to First American's production of documents related to your request #6.

8. A full accounting of staff hours [First American] employees dedicated to organized [sic] the events in Washington State.

First American responds by stating that the request for documents and information is overly broad, unduly burdensome and is not limited in scope. First American further responds by stating that this request requires providing documents and information that are not necessary to demonstrate compliance with WAC 284-29-200 through 284-29-265. Additionally, providing such information would not lead to any information that is germane or pertinent to the investigation at hand. As WAC 284-29-220(1) provides that a title company may donate the time of its employees to serve on a trade association committee it would not now be reasonable to require an accounting of hours that have been donated or contributed to committees or events. Moreover, First American is not able to locate any rule or statute that requires recordkeeping of hours spent on a trade association event. First American has kept appropriate recordkeeping of the matters needed to demonstrate compliance with WAC 284-29-220 and WAC 284-29-235. As hours spent are not a requirement of compliance with WAC 284-29-220 and WAC 284-29-235, First American objects to a request for hours spent which is not needed in order to show compliance. Without waiving such objection, First American responds by stating that any time spent in organizing the events is minimal at best as First American would not have actively organized the trade association events. Additionally, any hours spent in connection with the sponsorship of the 2014 Economic Forecast education seminar that was held in 2013 would be similar to the amount of hours spent sponsoring the 2015 Economic Forecast education seminar.

In light of there being no statute or rule requiring the tracking of hours spent on trade association events, First American would cordially request that if the Department of Insurance is of the opinion that hours spent donated to trade association committees as well as hours spent on contributing or sponsoring trade association events and education seminars must be tracked in order to show compliance with WAC 284-29-220 and WAC 284-29-235 that the Department provide guidance to the industry either through a bulletin or "FAQ."

First American respectfully answers that the sponsorship of the education seminar held by SCCAR on October 16, as well as all other sponsorships of trade association education seminars and events are permitted and done in accordance with WAC 284-29-220 and 284-29-235.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew B. Sager", written over a horizontal line.

Matthew B. Sager
Sr. Operations Counsel

CC

Kundert, Anne M.

From: Sager, Matthew <msager@firstam.com>
Sent: Thursday, April 02, 2015 4:00 PM
To: barryw@oic.wa.gov
Subject: First American's response to your letter dated March 5, 2015
Attachments: Letter to WA OIC 1229571 (2).pdf; Copy of Zillow Eco Forecast Oct 2014 Lenders(2).pdf; Copy of Zillow Eco Forecast Oct 2014 (2).pdf; SCCAR Emails.pdf; Zillow 2015 Forecast flyer.pdf; Loew's Invoice contract receipts.pdf; Washington State First American Trade Association Sponsorships 2013-2015.xlsx; Chelan County Golf Tournament Sponsorship 2013.pdf; Chelan County Installation Banquet Sponsorship 2014.pdf; Chelan County Realtor Fun Night Sponsorship June 2014.pdf; Clark County 2013-07-17 Building Industry Association - Parade of Homes Sponsorship.pdf; Clark County 2014-06-19 Building Industry Association - Comedy Night Sponsorship.pdf; King County AREAA sponsorship 2013.pdf; King County NAHREP Sponsorship 2013.pdf; King County Womens Counsel of Realtors 2013 Sponsorship.pdf; King County Womens Counsel of Realtors 2014 Sponsorship.pdf; Snohomish County SCAR Sponsorship receipt 2013.pdf; Snohomish County SCAR Sponsorship receipt 2014.pdf; Spokane Sponsorships 2013 Invoices.pdf; Spokane Sponsorships 2014 Invoices.pdf; Whatcom 2013 Association of Realtors sponsorship.pdf; Whatcom 2014 Association of Realtors sponsorship.pdf; Yakima 2014 YAR Gold Tournament sponsorship receipt.pdf; Yakima 2014 YAR Installation Banquet sponsorship receipt.pdf; Yakima 2015 Installation Banquet sponsorship receipt.pdf; WA 2013 Economic Forecast Event flyer.pdf; First American Response to Barry Walden April 2 2015.pdf

Barry,

Attached to this letter is First American's response to your letter dated March 5, 2015 relating to OIC Case # 1229571 (the last attachment) together with the items First American is producing with its response. Communications with the Washington State Office of the Insurance Commissioner and First American have previously been handled through the Company Complaint Response System. Your letter, however, was delivered by email and US Postal Service and did not request that I respond through the Company Complaint Response System. Please confirm that receipt of the attached response letter is acceptable.

For your convenience, I will have copies of the letter together with the items produced in response sent to you by FedEx. I anticipate having those items sent on Friday for delivery to you on Monday.

Matthew B. Sager

Sr. Operations Counsel
First American Title Insurance Company



First American

9000 East Pima Center Parkway, Scottsdale, AZ 85258

Phone: 602-685-7511

Mobile: 801-588-9871

Email: msager@firstam.com

March 5, 2015

First American Title Insurance Company
Matthew B. Sager
9000 East Pima Center Parkway
Scottsdale, AZ 85258

OIC Case No: 1229571

Dear: Matthew B. Sager

This letter is to advise you that the Office of the Insurance Commissioner has received a complaint against First American Title Company (FATIC). Mr. Chris Schulz filed the complaint which alleges that FATIC sponsored, organized, and paid for, a presentation not related to title insurance, for the benefit of approximately 200 producers of title insurance business. In addition, Mr. Schulz alleges that FATIC co-advertised with the Snohomish County-Camano Association of Realtors (SCCAR) by allowing the FATIC logo and phone number to be placed on the flyer announcing the event.

I have been assigned to investigate this matter. As part of the investigative process, I am requesting that you provide this office with a written response to the allegation. Specifically, please address the following issues:

1. Please explain who initiated the, "Economic Forecast", presentation.
2. Please explain how many events like this has FATIC coordinated in the last two years.
3. Please explain the nature of the presentation, "Economic Forecast".
4. Please explain how this presentation subject matter complies with WAC 284-29-235.
5. Please explain how much payedpaid to rent the Lowes Cineplex in Lynwood, Washington.
6. Please explain how many hours FATIC spend coordinating the event.
7. Please explain what database FATIC used to send flyers.
8. Please explain who authorized FATIC to place the SCCAR logo on the flyer.
9. Please explain why the SCCAR logo is at the top of the flyer.
10. Please explain how this complies with WAC 284-29-260(1)(a), and RCW 48.29.210(2).
11. Please explain the purpose of attendees RSVP to, cs.snoco@firtam.com.
12. Please explain how many producers of title insurance business signed up for the event.
13. Please explain if you requested a donation of the attendees.

Also, please provide this office with copies of the following documents:

1. A copy of the rental agreement between Lowes Cineplex and FATIC.
2. A copy of email between yourself and any SCCAR representatives.
3. A copy of email between you and Cobalt Mortgage.
4. A copy of the flyer you sent to your customers.
5. A copy of the list of attendees to the October 16, 2014 event.
6. An Excel spreadsheet with the name, date, address, group, rental receipts, catering bills, and the name of presenter, for each event that FATIC organized, or sponsored in Washington State from March 2013, to March 2015.
7. Copies of flyers created to advertise the events.
8. A full accounting of staff hours FATIC employees dedicated to organized the events in Washington State.

Please provide your written response and copies of the above listed documents by March 20, 2015. RCW 48.17.475 requires that licensees promptly reply in writing to an inquiry of the commissioner relative to the business of insurance within fifteen business days from the receipt of the inquiry. Failure to make a timely response constitutes a violation of this section.

We appreciate your cooperation in this matter. I may be reached directly at 360-725-7231 for further information.

Sincerely,

Barry M. Walden
Senior Investigator
Legal Affairs Division
360-725-7231/ BarryW@OIC.wa.gov



First American
Title Insurance Company

April 2, 2015

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In light of there being no statute or rule requiring the tracking of hours spent on trade association events, First American would cordially request that if the Department of Insurance is of the opinion that hours spent donated to trade association committees as well as hours spent on contributing or sponsoring trade association events and education seminars must be tracked in order to show compliance with WAC 284-29-220 and WAC 284-29-235 that the Department provide guidance to the industry either through a bulletin or "FAQ."

First American respectfully answers that the sponsorship of the education seminar held by SCCAR on October 16, as well as all other sponsorships of trade association education seminars and events are permitted and done in accordance with WAC 284-29-220 and 284-29-235.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew B. Sager", written over a horizontal line.

Matthew B. Sager
Sr. Operations Counsel

Kundert, Anne M.

From: Sager, Matthew <msager@firstam.com>
Sent: Thursday, April 02, 2015 4:00 PM
To: barryw@oic.wa.gov
Subject: First American's response to your letter dated March 5, 2015
Attachments: Letter to WA OIC 1229571 (2).pdf; Copy of Zillow Eco Forecast Oct 2014 Lenders(2).pdf; Copy of Zillow Eco Forecast Oct 2014 (2).pdf; SCCAR Emails.pdf; Zillow 2015 Forecast flyer.pdf; Loew's Invoice contract receipts.pdf; Washington State First American Trade Association Sponsorships 2013-2015.xlsx; Chelan County Golf Tournament Sponsorship 2013.pdf; Chelan County Installation Banquet Sponsorship 2014.pdf; Chelan County Realtor Fun Night Sponsorship June 2014.pdf; Clark County 2013-07-17 Building Industry Association - Parade of Homes Sponsorship.pdf; Clark County 2014-06-19 Building Industry Association - Comedy Night Sponsorship.pdf; King County AREAA sponsorship 2013.pdf; King County NAHREP Sponsorship 2013.pdf; King County Womens Counsel of Realtors 2013 Sponsorship.pdf; King County Womens Counsel of Realtors 2014 Sponsorship.pdf; Snohomish County SCAR Sponsorship receipt 2013.pdf; Snohomish County SCAR Sponsorship receipt 2014.pdf; Spokane Sponsorships 2013 Invoices.pdf; Spokane Sponsorships 2014 Invoices.pdf; Whatcom 2013 Association of Realtors sponsorship.pdf; Whatcom 2014 Association of Realtors sponsorship.pdf; Yakima 2014 YAR Gold Tournament sponsorship receipt.pdf; Yakima 2014 YAR Installation Banquet sponsorship receipt.pdf; Yakima 2015 Installation Banquet sponsorship receipt.pdf; WA 2013 Economic Forecast Event flyer.pdf; First American Response to Barry Walden April 2 2015.pdf

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Matthew B. Sager

Sr. Operations Counsel
First American Title Insurance Company



First American

9000 East Pima Center Parkway, Scottsdale, AZ 85258

Phone: 602-685-7511

Mobile: 801-588-9871

Email: msager@firstam.com

NCW Association of REALTORS®

610 N Mission Street, Ste 208
Wenatchee, WA 98801

Invoice

Date	Invoice #
9/11/2013	GOLF 09/13

Bill To
First American Title Ins. Accounts Payable - General PO Box 4020 Scottsdale, AZ 85261

PAID
10/25/2013

Qty	Item	Description	Rate	Amount
1	Hole Sponsor - GT	Hole Sponsorship	100.00	100.00
			Total	\$100.00
			Sales Tax (8.4%)	\$0.00
			Payments/Credits	-\$100.00
			Balance Due	\$0.00

NCW Association of REALTORS®

610 N Mission Street, Ste 208
Wenatchee, WA 98801

Invoice

Date	Invoice #
1/13/2014	EVENT 01/14

Bill To
First American Title Ins. Accounts Payable - General PO Box 4020 Scottsdale, AZ 85261

PAID
02/04/2014

Qty	Item	Description	Rate	Amount
5	Ticket	Ticket to Installation Banquet	35.00	175.00
1	Installation	Table Sponsorship	50.00	50.00
			Total	\$225.00
			Sales Tax (8.4%)	\$0.00
			Payments/Credits	-\$225.00
			Balance Due	\$0.00



DISBURSEMENT FORM

Date Submitted:	June 3, 2014	REQUIRED**Payment Needed by date:	June 17, 2014
Requesting Branch:	Wenatchee		State: WA
Payee	Lake Chelan Realtor Council	Phone Number	
Address	PO BOX 2945		
City	Chelan	State	WA
		Zip	98816
Check Request Reason/Explanation:	Dinner Tickets/sponsorship/Realtor Fun Night		

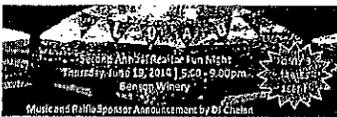
PAYMENT TYPE:	W-9**SEE BELOW
<input checked="" type="checkbox"/> CHECK <input type="checkbox"/> WIRE (REQUIRED attach wiring instructions) <input type="checkbox"/> EFT (REQUIRED attach EFT Funds Transfer Form on separate sheet) <input type="checkbox"/> International Wire (REQUIRED attach wiring instructions on separate sheet)	<input type="checkbox"/> Attached <input type="checkbox"/> On- File <input type="checkbox"/> Not Applicable
<p><small>**All suppliers are required to have completed W9 form on file prior to payment. Exceptions to this rule are claim settlement checks and refunds, non-profit organizations, government, claims, or refunds. If W9 is not submitted with this request, the FSC will make every effort to obtain the W9 from the payee; please note payment will not be disbursed until W9 is received.</small></p>	

REQUESTOR *	AUTHORIZED APPROVAL (CANNOT BE REQUESTOR)
Name (print): Hilary Jessup	Kristi McPherson
Phone: (509) 665-7321	(509) 665-7329
Email: hjessup@firstam.com	kmcperson@firstam.com
Signature:	Signature:

PAYMENT INFORMATION: (Please fill in GL String and attach second page if needed)				
Check Amount: \$	625.00	Check Print Description (25 Character Max):	Realtor Fun night	
Write out check amount:	six hundred twenty five and no/100-----			
GL Distribution Coding:				
Company Code	GL Account	Cost Center	Territory	Amount \$
1001	622190	02230	053	625.00

WHERE SHOULD THIS CHECK BE SENT/PRINTED?			
(CORPORATE CHECKS ONLY as allowed in SOP) Remote Printer:			
Mail check to:	<input type="checkbox"/> Payee	<input checked="" type="checkbox"/> Requestor- Address required	<input type="checkbox"/> Other- Please specify below
Shipping:	<input checked="" type="checkbox"/> Regular Mail	<input type="checkbox"/> FED-EX	Other:
Name/Address:	First American Title	16 S. Mission Street	
City/State/Zip	Wenatchee	WA	98801
Special Instructions:			

PLEASE SUBMIT TO ONE OF THE FOLLOWING:		
Phoenix FSC:	Email: checkreq.sw@firstam.com	Fax: 866-866-3404
Tallahassee FSC:	Email: se_accounting@firstam.com	Fax: 866-406-3473
CORPORATE processing:	Email: uscorp.ap@firstam.com	Fax: N/A



- Music and Raffle Sponsor Announcements by DJ Chelsea
- Table Sponsorship Includes:
- One - 60" Round Table w/ Black Table Cloth to decorate with marketing wares (barware, pens, pads, etc)
 - Two - \$25 Dinner Tickets *(No Assigned Seating)*
 - Company Name will be printed on Advertising as a Sponsor of the event
 - DJ Chelsea will be making Sponsorship Announcements throughout the evening. Sponsors will stand up and be recognized and table acknowledged.

There will be 1 exclusive Stage Sponsorship for \$300
It will be first come first serve, so get your sponsorship table ready!

Company: _____
Contact Name: _____
 \$200 Table Sponsorship (20 available)
 \$300 Stage Sponsorship (1 available)
 Raffle Item

Thursday, June 12th - Table set-up at 4pm

All sponsorships are due by June 16, 2011
Make checks payable to the Lake Colman Realtor Council
Drop off check at Colman Bank Office or mail to:
P.O. Box 294 Colman, WA 98116

For more information on this project call ARICE Harris: 509.670.6416

Network Network

From: JAMES P. O'NEILL
To: JAMES P. O'NEILL
Cc: JAMES P. O'NEILL
Subject: JAMES P. O'NEILL

James P. O'Neill
1234 Main Street
New York, NY 10001

James P. O'Neill
1234 Main Street
New York, NY 10001

James P. O'Neill
1234 Main Street
New York, NY 10001

James P. O'Neill
1234 Main Street
New York, NY 10001



DISBURSEMENT FORM

Date Submitted:	5/13/2013	REQUIRED ** Payment Needed by date:	5/20/2013
Requesting Branch:	Clark County	State:	WA
Payee:	BIA	Phone Number:	360-694-0933
Address:	103 E 29th Street		
City:	Vancouver	State:	WA
		Zip:	98663
Check Request Reason/Explanation:	See Attached Form		

PAYMENT TYPE:	W-9**SEE BELOW
<input checked="" type="checkbox"/> CHECK <input type="checkbox"/> WIRE (REQUIRED-attach wiring instructions) <input type="checkbox"/> EFT (REQUIRED attach EFT Funds Transfer Form or separate sheet) <input type="checkbox"/> International Wire (REQUIRED attach wiring instructions on separate sheet)	<input type="checkbox"/> Attached <input checked="" type="checkbox"/> On-File <input type="checkbox"/> Not
<small>** All suppliers are required to have completed W9 form on file prior to payment. Exceptions to this rule are claim settlement checks and refunds, non profit organizations, government, claims, or refunds. If W9 is not submitted with this request, the FSC will make every effort to obtain the W9 from the payer; please note payment will not be disbursed until W9 is received.</small>	

REQUESTOR:		AUTHORIZED APPROVAL (CANNOT BE REQUESTOR)	
Name (print):	John Cozier	Name (print):	Brenda Rawlins
Phone:	(360) 713-5283	Phone:	(206) 615-3024
Email:	jcozier@firstam.com	Email:	brawlins@firstam.com
Signature:		Signature:	Brenda will approve through epayables system

PAYMENT INFORMATION: (Please fill in GL String and attach second page if needed)				
Check Amount: \$	500.00	Check Print Description (25 Character Max):		
Write out check amount:	Five Hundred	GL Distribution Coding:		
Company Code	GL Account	Cost Center	Territory	Amount \$
1001		4748		

WHERE SHOULD THIS CHECK BE SENT / PRINTED?			
(CORPORATE CHECKS ONLY as allowed in SOP) Remote Printer:			
Mailed check to:	<input type="checkbox"/> Payee	<input checked="" type="checkbox"/> Requestor- Address required	Other- Please specify below
Shipping:	<input type="checkbox"/> Regular Mail	<input checked="" type="checkbox"/> FED-EX	Other:
Name/Address:	John Cozier First American	7710 NE Greenwood Dr, #160,	
City/State/Zip	Vancouver	WA	98665
Special Instructions:	Please RUSH by 5/20/13		

PLEASE SUBMIT TO ONE OF THE FOLLOWING:		
Phoenix FSC:	Email: checkreq.sw@firstam.com	Fax: 866-886-3404
Tallahassee FSC:	Email: se_accounting@firstam.com	Fax: 866-466-3473
CORPORATE processing:	Email: vscorp.ap@firstam.com	Fax: N/A



Builder and Realtor Night Game Sponsor

The NW Natural Parade of Homes & Open House Tour will be the focal point of home building remodeling and new construction for the summer. This year's dates are July 12th through the 28th at the Bella Ridge Development in Felida. On Wednesday, July 17th, the Parade of Homes will host "Builder and Realtor Night" to show appreciation to the Builders and Realtors that come to the show that evening. That time for Builder and Realtor Night is from 4 pm to 7 pm. We are looking for sponsors of the Carnival games that will be part of the entertainment that evening.

Realtor and Builder Night Game Sponsor Overview

- You will get exclusive signage with your company logo to be placed on two games of your choosing. (Upon receipt of your sponsorship money to the BIA, a list of games will be available.)
- You will receive 4 complimentary Parade of Homes tickets. These tickets may be used for any day of the show.
- You will be acknowledged as a game sponsor at Builder and Realtor Night.

The Investment:

This sponsorship will include all benefits covered in this proposal for an investment of \$500. Payment must be received by May 30, 2013 in order to guarantee sponsorship. Make check payable to BIA.

Additionally, you may promote and highlight the 2013 NW Natural Gas Parade of Homes through marketing means, best determined by your company.

Please sign below if you agree with the terms and benefits as listed in this proposal.

John D. Cozier (print name)

[Signature]
Authorized Representative

5/13/13
Date Accepted

BIA - Executive Director

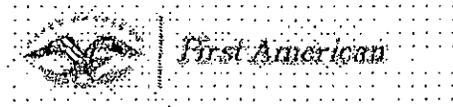
Date Accepted

Kolathur, Gopinath

From: Cozier, John
Sent: Tuesday, May 14, 2013 12:26 AM
To: TISW-RA-SW-BIC Check Req
Cc: Pinelli, Kerri
Subject: Please Rush Check Request by 5/20/13
Attachments: Parade of Homes20130000.pdf

Please find check request attached.

John D. Cozier
Clark County Area Manager
Vice President



First American Title
7710 NE Greenwood Drive, Vancouver, WA 98662
Direct: 360-713-5283
Mobile: 360-621-5653
Fax: 866-345-9430
Email: jcozier@firstam.com
Web: www.firstam.com/title/wa/dark



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family of companies | NYSE: FAF

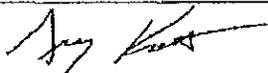
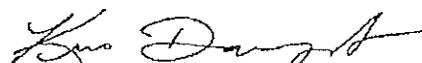


DISBURSEMENT FORM

Date Submitted:	4/29/2014	REQUIRED** Payment Needed by date:	5/7/2014
Requesting Branch:	WA CLK Clark Title - 00759	State:	WA
Payee	BIA of Clark County	Phone Number	360-694-0933
Address	103 E 29th Street		
City	Vancouver	State	WA
		Zip	98663
Check Request Reason/Explanation:	Social Hour Sponsor for Comedy Night		

PAYMENT TYPE:	W-9**SEE BELOW
<input checked="" type="checkbox"/> CHECK <input type="checkbox"/> WIRE (REQUIRED attach wiring Instructions) <input type="checkbox"/> EFT (REQUIRED attach EFT Funds Transfer Form on separate sheet) <input type="checkbox"/> International Wire (REQUIRED attach wiring Instructions on separate sheet)	<input type="checkbox"/> Attached <input checked="" type="checkbox"/> On- File <input type="checkbox"/> Not Applicable

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	REQUESTOR	AUTHORIZED APPROVAL (CANNOT BE REQUESTOR)
Name (print):	Greg Kott	Krls Davenport
Phone:	(360) 553 -3004	(360) 713 -5283
Email:	gkott@firstam.com	kdavenport@firstam.com
Signature		

PAYMENT INFORMATION: (Please fill in GL String and attach second page if needed)				
Check Amount: \$	250.00	Check Print Description (25 Character Max):	Comedy Night Sponsorship	
Write out check amount:	Two hundred fifty dollars and 00/100			
GL Distribution Coding:				
Company Code	GL Account	Cost Center	Territory	Amount \$
1001		00759	053	250.00

WHERE SHOULD THIS CHECK BE SENT/ PRINTED?			
(CORPORATE CHECKS ONLY as allowed in SOP) Remote Printer:			
Mail check to:	<input type="checkbox"/> Payee <input checked="" type="checkbox"/> Requestor- Address required <input type="checkbox"/> Other- Please specify below		
Shipping:	<input type="checkbox"/> Regular Mail <input type="checkbox"/> FED-EX Other:		
Name/Address:	Greg Kott First American Title, 7710 NE Greenwood Drive, #160		
City/State/Zip	Vancouver	WA	98662
Special Instructions:			

PLEASE SUBMIT TO ONE OF THE FOLLOWING:		
Phoenix FSC:	Email: checkreq.sw@firstam.com	Fax: 866-886-3404
Tallahassee FSC:	Email: se_accounting@firstam.com	Fax: 866-406-3473
CORPORATE processing:	Email: uscorp.ap@firstam.com	Fax: N/A

Davenport, Kris

From: Kott, Greg
Sent: Thursday, April 24, 2014 10:40 AM
To: Davenport, Kris
Subject: BIA Comedy Night Sponsorship

Kris, May I have a check for \$250 to BIA (includes 2 tickets) and then we'll just buy more tickets closer to event time for those who can make it.

Thanks.

Greg Kott
Development Services



First American
Title Insurance Company

7710 NE Greenwood Drive #160, Vancouver, WA 98662
Direct: 360.553.3004
Cell: 971.344.0187
Email: gkott@firstam.com

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From: Danielle Kilian [<mailto:Danielle@BIAofClarkCounty.org>]
Sent: Thursday, April 24, 2014 10:05 AM
To: Kott, Greg
Subject: Message

Hi Greg!

That is great! Thank you!! Looking forward to you being Social Hour Sponsor for Comedy Night!

We just need to get payment by Comedy Night, so, let me know when to have Sandy invoice you! ☺

We would of course love for you to bring a big group to laugh that night! We will see you soon!
Danielle

Danielle Kilian
Event Coordinator
BIA of Clark County – a Top 100 NAHB Association
Phone: 360-694-0933
Fax: 360-694-1606
Email: danielle@biaofclarkcounty.org
Website: www.biaofclarkcounty.org

Every good contractor is a BIA member, are you?

NAHB Member Advantage Discount Program
LOWE'S, GM, FedEx, UPS, FTD, Office Depot, HP, Wyndham Hotel, Hertz discounts & more!
Get all of the details online at www.nahb.org/MA

Palanisamy, Lavanya

From: Davenport, Kris
Sent: Tuesday, April 29, 2014 11:18 PM
To: TISW-RA-SW-BIC Check Req
Subject: BIA Check Request
Attachments: BIA Check Request.pdf

Categories: Phx-to-code

Attached please find a check request for an event sponsorship coming up here in Clark County.

Kris

Subscribe

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Past Issues

Trans

Tickets on sale now!

[View this email in your browser](#)



BUILDING INDUSTRY ASSOCIATION

LOL! Dinner & Comedy Show

*featuring stand up comedian & actor
Brian Moote*



as seen on FX, Comedy Central,

the USA Network, AXS TV, Nickelodeon and MTV

Thursday, June 19th

5:30pm Cocktails & Networking

6:30pm Dinner & Show

Presented by

DeWils

Social Hour sponsored by

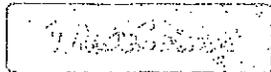


*First American
Title Insurance Company*

[Purchase your tickets or sponsor a table now](#)

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<u>First</u>	<u>Last</u>	<u>Company</u>	<u>Phone</u>
Anne	Allen	Windermere MC	(206) 755-7310
Maryanne	Armstrong	JLS Lake Stevens	(425) 238-8044
Waseem	Asfar	Northwest Real Estate Center	(425) 778-4000
Barbara	Athanas	Windermere RE	(206) 300-4208
Melinda	Baena	Windermere	(360) 568-1537
Gene	Baker		
Toby	Barnette	Keller Williams	425-653-1884
Brian	Barnhart	RE/Max TC	(425) 501-0449
Juliet	Beard	Windermere	(206) 715-5531
Bill	Beauprey	JLS Lake Stevens	(425) 334-1038
Nina	Bjornstal	RE/Max TC	(206) 730-0962
Marilyn	Blackburn	Gilpin Realty	(425) 232-8733
Casey	Bowers	Windermere GH	(425) 772-6187
Kelly	Brantley	New Horizon Realty	(425) 260-8512
Jason	Brock	Cobalt Mortgage	(425) 220-1419
Gene	Bryson	Windermere Arlington	(360) 435-0700
Leigh	Buchan Harvey	WRE HKW	(206) 730-1319
Denny	Bullock	BHHS	(206) 999-1980
Bob	Burke	JLS-Lynnwood	(425) 775-4591
Chere	Burtis	Harbour Homes	
Laura	Cable-Laird	hallmark Homes	(425) 345-3733
Jenni	Callaghan	KW Msvl	425-754-2047
Kay	Capanyola	WRE	(425) 931-4528
Brett	Carlton	Coast Real Estate Services	(425) 339-3638
Nicole	Carpenter	JLS Lake Stevens	
George	Caudill		(425) 381-0877
Mary	Chalverus	Harbour Homes	
Iva	Christensen	Preview Properties	(425) 348-9200
Glenn	Coil	Economic Alliance	(425) 248-4214
Scott	Comey	RE/Max Elite	(425) 350-0172
Debra	Connelly	Preview Properties	(425) 742-2700
Lelia	Cook	Gilpin Realty	(425) 238-2994
Ray	Cook	Gilpin Realty	(425) 238-0282
Lauri	Dennis	Berkshire Hathaway	(206) 972-6623
Lauri	Dennis Guest		
Lauri	Dennis Guest		
Linda	Dorgan	JLS-Lynnwood	(206) 706-4336
Jill	Estes	JLS	(425) 408-2802
Rochelle	Fahlman	New Horizon Realty	425-239-0072
Todd	Fahlman	New Horizon Realty	425-239-0072
Anita	Fawcett	WA Homes	425-238-0724
Peggy	Fisher	Preview Properties	(360) 757-6430
Carrie	Foley	BHHS	(425) 273-6967
Melody	Foreman	WRE Everett	425-923-7427
Chentelle	Fullwiler	RE/MAX NW	(425) 268-4409
Rob	Gadbois	RE/MAX Elite	(425) 760-5626

Paula	George	Windermere	(206) 949-6505
Anthony	Gladis	KW	425-220-3640
Donna	Gola	Keller Williams	(425) 212-2007
Margo	Gola	Keller Williams	(425) 212-2007
Leney	Gonzaga	North Pacific Properties	(206) 954-7568
Robin	Griner	New Horizon Realty	425-478-4488
Lorie	Groth	New Horizon Realty	(425) 422-7145
Hector	Guevara	Cascade Realty	(425) 268-4706
Braden	Gustafson	Gustafson & Associates	425-231-8367
Shelley	Hagstrom	Windermere	
Wendi	Hale	RE/MAX Elite	(425) 268-7111
David	Hamilton	Zip Realty	(425) 890-7932
Debra	Hamilton	Zip Realty	(425) 890-7932
Larry	Hammond	JLS	(206) 696-2862
Erica	Hardwick	Buck Real Estate	425-922-9795
Matt	Hart	Keller Williams	425-210-7307
Robin	hartley	Caliber RE	(425) 939-2370
Trent	Harwood	Preview Properties	(425) 336-6494
Susan	Heller	JLS-Lynnwood	(206) 551-9447
Amanda	Hellman	Windermere	(360) 990-7282
Ruth	Herren	lamoureux RE	425-335-4666
Leah	Herrera	RE/MAX NW	(425) 489-1223
Dee	Heyerdahl	CBB Danforth	425-422-6906
Evelyn	Himple	Keller Williams	(425) 870-3736
Jan	Hite	RE/Max TC	425-346-1501
Tory	Horsman	RE/MAX	(425) 258-1888
Sue	Hounshell	Windermere RE	(425) 238-8928
Dennis	Howard	Edmonds Realty	(425) 478-9640
Pat	Hubble	Action Realty	
Deborah	Hughes	Preview Properties	425-314-6180
TC	Hyatt	John L Scott	(425) 743-1600
Rio	Ingraham	JLS- Mill Creek	(425) 948-7111
Lindsay	Jackson	WRE HKW	
Linda	Jacobus	Preview Properties	(425) 308-4231
Kira	James	Windermere RE	(425) 422-2201
Tom	Jensen	Preview Properties	360-331-6006
Patrick	Johnson	Century 21 NH	(425) 387-7135
Teri	Jones-Walster	Preview Properties	(425) 344-7812
Alicia	Kersavage	Windermere	(425) 870-9071
Hank	Kindall	Champions	(425) 444-3445
Kelly	Kirkpatrick	Keller Williams	(425) 260-8512
Lisa	Knoth	New Horizon Realty	(360) 691-9297
Wendy	Kondo	WRE Lynnwood	(425) 478-9789
Shelley	Korn	KW Bothell	
Natalia	Kostiouk	John L Scott	
Stephanie	Krantz	RE/MAX NW	(425) 205-1234
Julee	Kraus	JLS MCTC	

Walt	Krein		
Glenda	Krull	Windermere RE	(425) 776-9580
Emmett	Lane	JLS	(425) 239-4097
Tracy	Lane	Lane Homes	(425) 239-4097
Tracey	Lang	New Horizon Realty	(425) 772-8021
Cheryl	Latimer	Windermere	(425) 327-3280
Gina	lee	John L Scott	(425) 286-7679
Julie	Lee	RE/Max	(206) 642-9698
Mary	Lee	Windermere	(206) 919-9515
Geraldine	Levet	Windermere Northlake	
Gordy	Lindstrom	Keller Williams	(425) 772-5845
Alex	Litovchenko		
Elena	Litovchenko	Preview Properties	(425) 348-9200
Lisa	Lobaugh		
Jess	Lyda	RE/MAX NW	(425) 487-3001
Julie	Lyda	RE/MAX NW	(425) 487-3001
Colleen	Mace		
Michelle	Macris	JLS	(425) 931-1136
Kevin	Mai	Dove Realty	
Bob	Maple	JLS	(425) 501-1631
Todd	Marshall	Windermere	(425) 327-1243
Dianne	Mathews	Keller Williams	(360) 840-3488
Tamera	Matthew	Windermere Camano	(425) 330-8671
Amanda	Mayberry	Windermere	2067946446
Jennifer	McGuire Heshaw	RE/MAX NW	(206) 250-3726
Ryan	Mclvin	SCCAR	
Tara	McKinney	Preview Properties	
Hayley	Meas	JLS Lake Stevens	(425) 876-1719
Andrew	Mellon	Lake Real Estate Inc.	(206) 909-3474
Justin	Mellon	Lake Real Estate Inc.	
Molly	Mendenhall	WRE HKW	
Kim	Meyer	Remax	
Tom	Minty	JLS-Lynnwood	(425) 744-5326
Bonnie	Moore	Asset Realty Group	
Susan	Moore	Windermere Edmonds	(206) 719-8122
Christine	Morse	KW	
Jennifer	Murphy	Gilpin Realty	(425) 223-8096
Jenifer	Murrweiss	RE/MAX	(425) 422-7243
Joe	Mustach	WRE HKW	
Kristine	Nicholls	Windermere	(425) 232-5355
Kristine	Niemi	Keller Williams	(206) 369-4285
Corine	Oak Kim	Champions Real Estate Services	(425) 744-5577
Jim	O'Day	New Horizon Realty	(425) 359-2708
Young	Oh	Frontier Realty	(425) 712-8949
Heather	Oie	Task Properties	(425) 870-4642
Tiffany	Olson	KW	425-508-2709

Melody	Oxley	CBB Danforth	206-683-9391
Terry	Palmer	Century 21 NH	(425) 923-8446
Bob	Patera	RE/Max TC	(425) 374-9339
Kat	Patera	RE/Max TC	(425) 334-1818
Ryan	Patrick	RE/MAX NW	(206) 356-7244
Joey	Perrigo	Home Realty	(206) 949-2134
Tolin	Peterson	Preview Properties	(206) 362-0700
Tolin	Peterson's guest		
Ben	Pfiester	JLS Mill Creek Town Center	(425) 770-2133
Ben	Pfiester	JLS MC	
Julia	Phillip	The Force Realty	(262) 960-1998
JoAnn	Piispanen	JLS	(425) 750-3735
Bunsong	Pumma	KW	425-231-3574
Cassey	Reithelt	Windmere RE	
Joelle	Rekdahl	Windermere	(425) 508-1827
Jay	Richardson	JLS MCTC	
Holley	Ring	Windermere	(206) 852-6107
Dominique	Roberts	BHHS	(206) 979-3490
Jim	Robeson	Champions RE	
Leslie	Robinson	Champions RE	
Tracey	Rodrigue	Windermere RE	(425) 350-0944
Vincene	Rose	Preview Properties	(425) 239-6531
Dan	Roth	Preview Properties	425-239-4974
Marlene	Rouleau	Windermere	(206) 409-6041
Brenda	Rumball	Century 21 NH	(425) 244-0400
Kelly	Russell	CBB	425-387-4285
Lisa	Ruybal	Ruybal Group	(425) 210-6651
Kathie	Salvadalena	Windermere RE	(360) 568-1537
Carol	Sanders	WA Homes LLC	425-308-0226
Roxanne	Santiago	Windermere MC	(425) 770-3334
Jim	Scafer	Edmonds Realty	(206) 920-7653
Suzanne	Schempp	Windermere RE	(206) 595-9145
Dafna	Shalev	RE/MAX NW	(425) 220-1356
Kami	Shaw	Windermere	
Rhonda	Shea	JLS Lake Stevens	(425) 890-2241
Darrel	Shefstad	Cascade Realty	(425) 339-0123
John	Short	BHHS	(206) 354-8047
Sandra	Simmons	Windermere	(206) 261-4640
Patti	Smiley	Champions Real Estate NW	(425) 455-5913
Terry	Smiley	Champions Real Estate NW	(425) 455-5913
Duane	Smith	Zip Realty	
Sarah	Sorenson	The Force Realty	(425) 332-7112
Lisa	Sprute	Asset Realty Group	(425) 268-9367
Blake	Stedman	Coast Real Estate Services	(425) 551-0829
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Jim	Stephanson	Economic Alliance	(425) 248-4214
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Elene Wahlin
Elene Wahlin

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Jason	Brock	Cobalt		
Debbie	Compton	NW Plus CU		debbiec@nwpluscu.com
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Lydia	Guel	NW Plus CU		
David	Haley	Seattle Mortgage	(425) 563-1174	david@seattlemortgagetoday.com
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Barbara	Kring	Cobalt		
Susan	Langager	USBank	(206) 344-5696	SUSAN.LANGAGER@usbank.com
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Olga	Marchenck	Cobalt		
Chad	Mattison	Cobalt		
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Sean	Psaradelis	Umpqua	(425) 741-5804	SeanPsaradelis@umpquabank.com
Rob	Purser	Union Bank		rob.purser@gmail.com
James	Reese	Cobalt		
Diana	Reis	Cobalt		
Brendan	Ries	Cobalt		
Arthur	Robertson	Coastal Bank	(425) 257-1662	arobertson@coastalbank.com
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Brett	Schuelke	Coastal Bank	(425) 357-3697	bschuelke@coastalbank.com
Katherine	Shattuck	Cobalt		
Chelan	Shero	Cobalt		
Joe	Smith	Coastal Bank	(360) 794-0781	jsmith@coastalbank.com
Sam	Stickney	Cobalt		
Michael	Swanson	Coastal Bank	(425) 357-3661	mswanson@coastalbank.com
Cody	Touchette	Cobalt		
Jay	Wildin	Cobalt		
Marci	Willis	Heritage		
Carmen				
Nancy		NW Plus CU		



First American
Title Insurance Company

April 2, 2015

Barry Walden
Senior Investigator
Legal Affairs Division
Office of Insurance Commissioner
P.O. Box 40256
Olympia, WA 98504-0256

RE: OIC Case #1229571

Dear Mr. Walden,

This letter serves as First American Title Insurance Company's ("First American") response to your letter dated March 5, 2015 that was addressed to me. First American previously responded to an inquiry from Fritz Denzer on this matter. Some of the questions you have asked were addressed in our prior response. A copy of our response to Fritz Denzer together with the documents that accompanied our response are being provided for your convenience.

First American answers the questions raised in your letter as follows:

1. Please explain who initiated the "Economic Forecast" presentation.

As First American has a relationship with Snohomish County Camino Association of Realtors ("SCCAR"), an employee of First American had a discussion with SCCAR exploring the option of sponsoring a trade association seminar.

2. Please explain how many events like this has [First American] coordinated in the last two years.

First American responds by stating that the question asked is vague and unclear. Additionally, the question asked is potentially duplicative of other questions asked. As such, it is believed that the response to this question is adequately addressed in First American's responses herein. First American responds by stating that it sponsored a trade association education seminar with SCCAR in 2013 in addition to the SCCAR education seminar held in 2014 which is the subject of your inquiry.

3. Please explain the nature of the presentation "Economic Forecast."

As demonstrated in the associated flyer, the Economic Forecast is intended to provide information relative to the real estate market by explaining current market conditions and what can be expected within the upcoming year based on economic forecasts.

4. Please explain how this presentation subject matter complies with WAC 284-29-235.

The Economic Forecast class was a trade association education seminar that was sponsored, in part, by First American. As such, WAC 284-29-235(3) does not place a restriction or limitation on the subject matter of a trade association education seminar sponsored by a title company. The Washington State Office of the Insurance Commissioner has addressed this very issue in its online "FAQ's" section and provided its explanation of the statute as it applies to the subject matter of a trade association education seminar. In referring to WAC 284-29-235 and WAC 284-29-220, the response was provided that "[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

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title company complies with the requirements related to sponsoring a trade association event.” <http://www.insurance.wa.gov/for-producers/title-insurance/inducement-rules/events/> (as updated on 12/10/2014) (emphasis added).

First American accordingly responds by stating that the Economic Forecast seminar was a trade association education seminar and as such, WAC 284-29-235(3) does not place a limitation or restriction on the subject matter that is presented.

5. Please explain how much payedpaid [sic] to rent the Lowes Cineplex in Lynwood, Washington.

The cost for renting the Lowes complex for the trade association education seminar was \$875.

6. Please explain how many hours [First American] spend [sic] coordinating the event.

A First American marketing representative contributed no more than 2.5 hours related to the trade association education seminar. An individual in the marketing department who assisted in creating the flyer spent no more than 20 minutes.

7. Please explain what database [First American] used to send flyers.

First American responds by stating that the question asked is vague and ambiguous. First American is unsure as to what is meant by using a database to send flyers. First American does respond by stating that the flyer was sent by email to SCCAR for their distribution and use.

8. Please explain who authorized [First American] to place the SCCAR logo on the flyer.

SCCAR has previously provided our marketing representative their logo to market the economic forecast education seminar. There were discussions with SCCAR regarding the use of the logo in the flyer. As the flyer was used for SCCAR’s distribution, SCCAR sent the flyer to their members and posted the flyer on their website which use and distribution of the flyer further demonstrates their acceptance, approval and authorization.

9. Please explain why the SCCAR logo is at the top of the flyer.

The logo is provided at the top of the flyer to clearly identify the trade association.

10. Please explain how this complies with WAC 284-29-260(1)(a) and RCW 48.29.210(2).

First American responds by stating that the question asked is vague and does not properly reference the statutes and regulations at issue. WAC 284-29-29-260(1) expressly permits those activities, sponsorships, donations, contributions and educations seminars, among other matters, that are provided for in WAC 284-29-200 through 284-29-255. Sponsorship of a trade association education seminar is expressly permitted by WAC 284-29-220(5) and WAC 284-29-235(3). Accordingly, First American’s sponsorship of the SCCAR education seminar is in compliance WAC 284-29-260 as it is permitted based on the provisions of WAC 284-29-220(5) and WAC 284-29-235(3).

RCW 48.29.210 does not apply to the sponsorship of a trade association education seminar. Given that a sponsorship is expressly permitted by statute, it could not then be deemed as prohibited under the general restrictions found in RCW 48-29.210(2).

11. Please explain the purpose of attendees RSVP to cs.snoco@firstam.com.

The cs.snoco@firstam.com email was used as a matter of convenience and ability to track and monitor attendees. First American sponsored the education seminar and wanted to see how well the event would be attended.

12. Please explain how many producers of title insurance business signed up for the event.

As shown in the list that was previously provided in response to our letter to Fritz Denzer, there was a total of 227 realtors and 43 affiliate members that signed up for the education seminar.

13. Please explain if you requested a donation of the attendees.

First American did not request a donation of attendees.

First American responds to your requests for documents as follows:

1. A copy of the rental agreement between Lowes Cineplex and [First American].

A copy of the invoice from Lowes for the education seminar is being provided with this letter.

2. A copy of email [sic] between yourself and any SCCAR representatives.

First American responds by stating that the request for documents is overly broad and unduly burdensome in that the request does not specify a time period and is not limited to matters pertaining to the education seminar which is the subject of the investigation. First American further responds by stating that the information and documents requested are not necessary to demonstrate compliance with WAC 284-29-200 through 284-29-265. First American response is that there are no emails between me and any SCCAR representative. Although your request is directed to me and not First American, First American will provide the emails it is able to locate between its marketing representative and SCCAR relating to the education seminar.

3. A copy of email [sic] between you and Cobalt Mortgage.

First American responds by stating that the request for documents is overly broad, unduly burdensome and is not limited in scope. First American further responds that documents and information requested are not necessary to demonstrate compliance with WAC 284-29-200 through 284-29-265. First American's response is that there are no emails between me and Cobalt Mortgage. Although your request is directed to me and not First American, First American responds by stating that it is not currently able to locate emails to and from Cobalt Mortgage and other employees of First American as emails are automatically archived and deleted from a user's account. First American would emphasize that emails with Cobalt Mortgage are not necessary to show compliance (or even noncompliance) with WAC 284-29-220 and WAC 284-29-235. Based on discussions with its employees, First American was able to discover that communications with Cobalt Mortgage regarding the education seminar at issue were primarily discussing the type of menu Cobalt Mortgage should provide for its sponsorship of the education seminar. If you consider these emails to be an important part of the investigation, First American will, upon your request, coordinate with its IT department to attempt to locate these emails.

4. A copy of the flyer you sent to your customers.

A copy of the flyer announcing the 2015 Economics Forecast education seminar that was provided to SCCAR for their distribution is being provided with this letter.

5. A copy of the list of attendees to the October 16, 2014 event.

A copy of the list of attendees was previously provided by First American to Fritz Denzer. The list of attendees to the October 16 education seminar is also being provided with this letter.

6. An Excel spreadsheet with the name, date, address, group, rental receipts, catering bills and the name of the presenter for each event that [First American] organized or sponsored in Washington State from March 2013 to March 2015.

First American responds by stating that the request for documents is overly broad and unduly burdensome. Additionally, the request goes beyond the scope of this investigation. This investigation pertains to a trade association education seminar. The request for documents, however, is now requiring documents related to all events and as such, First American is concerned that the request is not limited in scope and confuses the issue at hand. Moreover, this request may cause confusion regarding the difference between a trade association event and a trade association education seminar. First American will provide what it is able to locate regarding events that it has sponsored with a trade association from March 2013 to March 2015.

7. Copies of flyers created to advertise the events.

First American responds by stating that the request for documents is overly broad, unduly burdensome and is not limited in scope. First American will provide the flyers used to advertise the events identified in response to First American's production of documents related to your request #6.

8. A full accounting of staff hours [First American] employees dedicated to organized [sic] the events in Washington State.

First American responds by stating that the request for documents and information is overly broad, unduly burdensome and is not limited in scope. First American further responds by stating that this request requires providing documents and information that are not necessary to demonstrate compliance with 284-29-200 through 284-29-265. Additionally, providing such information would not lead to any information that is germane or pertinent to the investigation at hand. As WAC 284-29-220(1) provides that a title company may donate the time of its employees to serve on a trade association committee it would not now be reasonable to require an accounting of hours that have been donated or contributed to committees or events. Moreover, First American is not able to locate any rule or statute that requires recordkeeping of hours spent on a trade association event. First American has kept appropriate recordkeeping of the matters needed to demonstrate compliance with WAC 284-29-220 and WAC 284-29-235. As hours spent are not a requirement of compliance with WAC 284-29-220 and WAC 284-29-235, First American objects to a request for hours spent which is not needed in order to show compliance. Without waiving such objection, First American responds by stating that any time spent in organizing the events is minimal at best as First American would not have actively organized the trade association events. Additionally, any hours spent in connection with the sponsorship of the 2014 Economic Forecast education seminar that was held in 2013 would be similar to the amount of hours spent sponsoring the 2015 Economic Forecast education seminar.

In light of there being no statute or rule requiring the tracking of hours spent on trade association events, First American would cordially request that if the Department of Insurance is of the opinion that hours spent donated to trade association committees as well as hours spent on contributing or sponsoring trade association events and education seminars must be tracked in order to show compliance with WAC 284-29-220 and WAC 284-29-235 that the Department provide guidance to the industry either through a bulletin or "FAQ."

First American respectfully answers that the sponsorship of the education seminar held by SCCAR on October 16, as well as all other sponsorships of trade association education seminars and events are permitted and done in accordance with WAC 284-29-220 and 284-29-235.

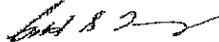
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew B. Sager", written in a cursive style.

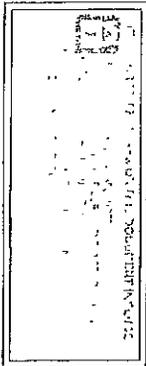
Matthew B. Sager
Sr. Operations Counsel

Account Number: 1010010000 Date: 08/07/2013
 Amount: \$1,000.00 Serial Number: 29151714
 Sequence Number: 235235009669890

THIS DOCUMENT CONTAINS A TRUE WATERMARK. HOLD AT A LIGHT TO VIEW THE BACKGROUND OF THIS CHECK IS COLORED NOT A WHITE BACKGROUND

	FIRST AMERICAN TITLE INSURANCE COMPANY 8000 E Pima Center Parkway Scottsdale, AZ 85259	FIRST AMERICAN TRUST, FSB A FIRST AMERICAN WAY SANTA ANA, CA 92707	No 29151714
Not valid after 180 days			
		90-4125/1222	
		Date 12-Jul-2013	
One Thousand Dollars And Zero Cents*****		\$ *****1,000.00	
		AMOUNT (USD)	
PAY TO THE ORDER OF	AREA WASHINGTON CHAPTER 12410 SE 32ND ST 100 BELLEVUE WA 98005	 AUTHORIZED SIGNATURE(S)	

⑈0029151714⑈ ⑆122241255⑆ 1010010000⑈



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Deposited by *for use*
 Deposited by *the named*
 1234567890

Account Number: 1010010000 Date: 08/22/2013
 Amount: \$1,000.00 Serial Number: 29155294
 Sequence Number: 235235009340180

THIS DOCUMENT CONTAINS A TRUE WATERMARK. HOLD AT A LIGHT TO VIEW THE BACKGROUND OF THIS CHECK IS COLORED TO ALLOW THE BACKGROUND

 <p>FIRST AMERICAN TITLE INSURANCE COMPANY 9000 E Pima Corner Parkway Scottsdale, AZ 85268</p>	<p>FIRST AMERICAN TRUST, FSB 5 FIRST AMERICAN WAY SANTA ANA, CA 92707</p>	<p>No 29155294</p>		
<p>Not valid after 180 days</p>				
<p>90-4125/1222 Date 31-Jul-2013</p>				
<p>One Thousand Dollars And Zero Cents*****</p>				
<p>PAY TO THE ORDER OF</p>	<p>NAHREP SEATTLE CHAPTER PO BOX 3934 SEATTLE WA 98124-3934</p>	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="width: 20px; text-align: center;">\$</td> <td style="text-align: center;">*****1,000.00</td> </tr> </table> <p style="text-align: center; font-size: small;">AMOUNT (USD)</p> <p style="text-align: center;"><i>[Signature]</i> AUTHORIZED SIGNATURE(S)</p>	\$	*****1,000.00
\$	*****1,000.00			

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<p style="text-align: center; font-size: small;">MICROFILMED COPY OF ORIGINAL CHECK</p>	<p style="text-align: center; font-size: small;">MICROFILMED COPY OF ORIGINAL CHECK</p>	<p style="text-align: center; font-size: small;">MICROFILMED COPY OF ORIGINAL CHECK</p>
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for deposit only
 acct # 235070760
 312562410

Account Number: 1010010000 Date: 09/23/2013
 Amount: \$1,000.00 Serial Number: 18077108
 Sequence Number: 235235009764530

DO NOT CASH THIS CHECK UNLESS YOU CAN SEE A TRUE WATERMARK
 HOLD UP TO LIGHT TO SEE DOUGHERTY

FIRST AMERICAN TITLE INSURANCE COMPANY FIRST AMERICAN TRUST, FSB
 3000 E Plaza Center Parkway 10000 E Santa Ana Way
 Scottsdale, AZ 85258 SANTA ANA, CA 92707

No 18077108
 90-4125/1222
 Date 23-Aug-2013

One Thousand Dollars And Zero Cents *****
 Not valid after 180 days

\$ *****1,000.00
 AMOUNT (USD)

PAY TO THE ORDER OF WOMENS COUNCIL OF REALTORS
 2265 1ST AVE S
 SEATTLE WA 98134
 US

AUTHORIZED SIGNATURE(S)

⑈0018077108⑈ ⑆12224125⑆ 1010010000⑈

NOTE THE ABOVE LINES ARE COMPOSED OF MICRO TYPE CONTAINING THE WORDS "SAFE" CHECK WITH MAGNIFIER.

PLACE FINGER ON FLAT SURFACE, RUB AREA FREELY AND RAPIDLY TO REVEAL MICRO TYPE. MICRO TYPE SHOULD BE AUTHENTIC. DO NOT WRITE OR SIGN BELOW THIS LINE.

ENDORSE HERE

WARNING DO NOT CASH THIS CHECK WITHOUT NOTING SECURITY FEATURES ON FRONT AND BACK.

Account Number: 1010010000 Date: 09/30/2014
 Amount: \$1,000.00 Serial Number: 10746505
 Sequence Number: 235235009523390

**DO NOT CASH THIS CHECK UNLESS YOU CAN SEE A TRUE WATERMARK
 HOLD UP TO LIGHT TO SEE "DOOR" CHECKS**

 FIRST AMERICAN FIRST AMERICAN TITLE INSURANCE COMPANY 9000 E Pima Center Parkway Scottsdale, AZ 85258	FIRST AMERICAN TRUST, FSI 6 FIRST AMERICAN WAY SANTA ANA, CA 92701	No 10746505 00-4125/1222 Date 22-Sep-2014
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One Thousand Dollars And Zero Cents*****

Not valid after 180 days

PAY TO THE ORDER OF WOMENS COUNCIL OF REALTORS C O ABSOLUTE MORTGAGE 500 108TH AVE NE 1700 BELLEVUE WA 98004 US	<table border="1" style="margin-left: auto;"> <tr> <td style="width: 20px;">\$</td> <td style="width: 100px;">*****1,000.00</td> </tr> </table> AMOUNT (USD) <i>MM McCread</i> AUTHORIZED SIGNATURE(S)	\$	*****1,000.00
\$	*****1,000.00		

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PLACE FINGER ON FLAT SURFACE. RUB AREA FIRMLY AND RAPIDLY DOCUMENT TO BE AUTHENTIC. DISAPPEAR AND REAPPEAR FOR DO NOT WRITE OR SIGN BELOW THIS LINE

WARNING DO NOT CASH THIS CHECK WITHOUT NOTING SECURITY FEATURES ON FRONT AND BACK.

ENDORSED TO THE ACCOUNT OF
 WITHIN NAMED PAYEE
 Wells Fargo Bank, N.A.
 AU 55273 AU 55223

NOTE THE ABOVE LINES ARE COMPOSED OF MICRO TYPE CONTAINING THE WORDS "SAFE" CHECK WITH MAGNIFIER.



First American
Title Insurance Company

November 21, 2014

Frederic Denzer
Compliance Analyst
Consumer Advocacy
Office of Insurance Commissioner
P.O. Box 40256
Olympia, WA 98504-0256

RE: OIC Case #1229571

Dear Mr. Denzer,

This letter serves as First American Title Insurance Company's ("First American") response to your letter dated October 27, 2014. Documents supporting First American's response are being submitted together with this letter. First American operates in Washington as a title insurer, NAIC # 50814.

First American respectfully responds by stating that its sponsorship of the education seminar held on October 16 was in compliance with WAC 284-29-220. First American was a sponsor of the educational seminar presented by the Snohomish County-Camino Association of Realtors ("SCCAR"). As shown in the flyers advertising the event, this was a SCCAR educational seminar. It can also be seen in the flyer that First American's role in the event was that of a sponsor. The total fee paid to sponsor the educational seminar was \$875, below the \$1,000 limit per WAC 284-29-220 (5)(b)(i).

For your information, the seminar was made available to all SCCAR members and affiliate members. First American made efforts to ensure that the event would be available to all members as can be shown in the correspondence between First American and SCCAR. SCCAR informed First American that notice of the seminar was sent on two occasions to all of its members and was also included in an e-newsletter that was provided to all members. First American was also informed by SCCAR that they posted the seminar on their website making it generally available to all members and affiliate members. As can be seen in the accompanying attendee roster, the seminar did not benefit a selected producer member of the SCCAR. It can also be seen that affiliate members were able to attend as several lenders also attended the seminar. Additionally, every attendee, whether they were a member of the SCCAR or not, were treated equally as there was no charge for any person that attended the event. The list of attendees demonstrates that the seminar was not held for a selected member but was open to all members and affiliate members.

First American respectfully answers that the sponsorship of the education seminar held by SCCAR on October 16 was permitted and done in accordance with WAC 284-29-220 and 284-29-235.

Respectfully submitted,

Matthew B. Sager
Sr. Operations Counsel

9000 E. Pima Center Parkway, Scottsdale, Arizona 85258

TEL 602-685-7511 • FAX 602-685-7015

msager@firstam.com



Rental - First American Title and Escrow-41584-

AMC Contact Information:	Theatre Details:	Rental Organization Contact:
Theatre Contact Michelle Goff Hourly Manager MGoff@amctheatres.com	Alderwood 16 - 2629 18735-33RD AVE. WEST LYNWOOD, WA 98037 Phone 425-921-2985 Fax 425-921-2986 Email 2629@amctheatres.com	First American Title and Escrow Sara Christensen 2707 Colby Ave, Suite 601 Everett, WA, 98201 425-551-4840 (Phone) 856-859-0436 (Fax) schristensen@firstam.com
Rentals Contact Coordinator Name Coordinator Contact # Coordinator Email		

Event Details

Event Start Date: 11/6/2013
Additional Dates:

Event Schedule

Site Access:	11:00AM
Walk-in/ Catering / Attendees Arrive:	11:15AM
Program Starts:	11:30AM
Program Ends:	1:00PM
Access Ends:	1:30PM
	\$875

Alderwood Unit 1629
 18735 33RD AVE WEST
 LYNWOOD WA 98037
 425-921-2985
 425-921-2986
 2629@amctheatres.com

Quantity	Unit Cost	Charges
Tickets for Current Release		0
		0
		0
		0
		0
AV Requests: Microphone	Pay at Theatre	0
Additional Comments:		Rental Total :\$ 875

[Signature]
 American Multi-Cinema, Inc.

Date: 9/19/13

[Signature]
 Client Signature

9-19-13
 Date:



Rental - First American Title and Escrow-41949-

AMC Contact Information: Theatre Contact Chelsea Atkins Hourly Manager CATkins@amctheatres.com	Theatre Details: ALDERWOOD 16 - 2629 18733-33RD AVE. WEST LYNNWOOD, WA 98037 Email 2629@amctheatres.com	Rental Organization Contact First American Title and Escrow Sara Christensen 2707 Colby Ave, Suite 601 Everett, WA, 98201 425-551-4840 (Phone) 866-859-0436(Fax) SChristensen@firstam.com
--	--	---

Event Details

Event Start Date: 11/6/2014 10/16/14 Auditorium(s)/Seat Count(s) AUD 3 = 185 Seats Feature Name	Event Schedule Site Access: 10:30am Walk-In/ Catering / Attendees Arrive 11:00am Program Starts 11:30am Program Ends 1:00pm Access Ends
Facility Rental	Alderwood Unit 2629 18733 33RD AVE W. LYNNWOOD, WA 98037- CASHIER: SAR 02/26/2014 11:00:00 AM 22 \$1.00 PHELIKA Total: \$22.00 VENDOR: CHRISTENSEN SARA S* AUTH: 000000 CUSTOMER COPY
Line Item	Charges
No concession items billed	0
Tickets for Current Release	0
Catering Fee	0
	0
	0
	0
	0
AV Requests: MIC + Speakers Pay at Theatre	Rental Total :\$ 875

Additional Comments:

[Signature]
 American Multi-Cinema, Inc.

Date: 8/12/14
 Date: 8/12/14
 Client Signature

AMCE/Confidential
 (Initials)

-----Original Message-----

From: Christensen, Sara

Sent: Wednesday, September 03, 2014 4:19 PM

To: SCCAR Government Affairs Ryan McIrvine; matthew@sccar.com

Subject: Zillow 2015 Forecast flyer For SCCAR Website

Hello gentlemen! I've attached the flyer that is being used to help bring in Brokers next month to the Zillow Economic Forecast. Can you also put this out to the members?

Thank you so much, Sara



---Original Message---

From: Christensen, Sara

Sent: Thursday, September 25, 2014 5:15 PM

To: 'Matthew Wahlquist'

Cc: 'ryan@sccar.com'

Subject: FW: Zillow 2015 Forecast flyer For SCCAR Website

Importance: High

Hello, I'm following up, have you already pushed this out via email? I haven't received it if so.

And can you put this on the website too please?

Thank you, Sara

-----Original Message-----

From: Christensen, Sara

Sent: Wednesday, September 03, 2014 4:19 PM

To: SCCAR Government Affairs Ryan McIrvin; matthew@sccar.com

Subject: Zillow 2015 Forecast flyer For SCCAR Website

Hello gentlemen! I've attached the flyer that is being used to help bring in Brokers next month to the Zillow Economic Forecast. Can you also put this out to the members?

Thank you so much, Sara

-----Original Message-----

From: Christensen, Sara

Sent: Friday, September 26, 2014 8:49 AM

To: Matthew Wahlquist

Subject: Re: Zillow 2015 Forecast flyer For SCCAR Website

thank you!!!

Sara Christensen, VP
Sales Manager
First American Title
2702 Colby Ave, Ste 601
Everett, WA 98201

206.947.6754 cell

Sent from my iPad

On Sep 26, 2014, at 8:47 AM, "Matthew Wahlquist" <matthew@sccar.com> wrote:

- > Sara,
- > We are marketing the class in our member e-newsletter. This should
- > go out to our active members on Monday, September 29th. I have asked
- > Ryan to add the event to our website.
- > Have a great weekend.
- >
- > Matthew Wahlquist
- > Executive Director
- > Snohomish County-Camano
- > Association of REALTORSR
- > (425) 339-1388
- > Matthew@SCCAR.com
- >
- > Make your membership count. Get involved.
- >
- >
- >
- >
- > The information contained in this e-mail communication and any
- > attached documentation may be privileged, confidential or otherwise
- > protected from disclosure and is intended only for the use of the designated recipient(s).
- > It is not intended for transmission to, or receipt by, any
- > unauthorized person. The use, distribution, transmittal or
- > re-transmittal by an unintended recipient of this communication is
- > strictly prohibited without our express approval in writing or by
- > e-mail. If you are not the intended recipient of this e-mail, please

> delete it from your system without copying it and notify the above sender so that our e-mail address may be corrected.

> Receipt by anyone other than the intended recipient is not a waiver of any attorney-client or work product privilege.

>

>

> -----Original Message-----

> From: Christensen, Sara [<mailto:SChristensen@firstam.com>]

> Sent: Thursday, September 25, 2014 5:15 PM

> To: Matthew Wahlquist

> Cc: ryan@sccar.com

> Subject: FW: Zillow 2015 Forecast flyer For SCCAR Website

> Importance: High

>

> Hello, I'm following up, have you already pushed this out via email? I

> haven't received it if so.

>

> And can you put this on the website too please?

>

> Thank you, Sara

>

> -----Original Message-----

> From: Christensen, Sara

> Sent: Wednesday, September 03, 2014 4:19 PM

> To: SCCAR Government Affairs Ryan McIrvine; matthew@sccar.com

> Subject: Zillow 2015 Forecast flyer For SCCAR Website

>

> Hello gentlemen! I've attached the flyer that is being used to help

> bring in Brokers next month to the Zillow Economic Forecast. Can you

> also put this out to the members?

>

> Thank you so much, Sara

>

> *****

> *****

> *****

> This message may contain confidential or proprietary information

> intended only for the use of the

> addressee(s) named above or may contain information that is legally

> privileged. If you are not the intended addressee, or the person

> responsible for delivering it to the intended addressee, you are

> hereby notified that reading, disseminating, distributing or copying

> this message is strictly prohibited. If you have received this message

> by mistake, please immediately notify us by replying to the message

> and delete the original message and any copies immediately thereafter.

>

> If you received this email as a commercial message and would like to

> opt out of future commercial messages, please let us know and we will

> remove you from our distribution list.

>

> Thank you.~

> *****

> *****

> *****

> FAFLD

>

> On Sep 26, 2014, at 8:47 AM, "Matthew Wahlquist" <matthew@sccar.com> wrote:

>

>> Sara,

>> We are marketing the class in our member e-newsletter. This should
>> go out to our active members on Monday, September 29th. I have asked
>> Ryan to add the event to our website.

>> Have a great weekend.

>>

>> Matthew Wahlquist

>> Executive Director

>> Snohomish County-Camano

>> Association of REALTORSR

>> (425) 339-1388

>> Matthew@SCCAR.com

>>

>> Make your membership count. Get involved.

>>

>>

>>

>>

>> The information contained in this e-mail communication and any
>> attached documentation may be privileged, confidential or otherwise
>> protected from disclosure and is intended only for the use of the
> designated recipient(s).

>> It is not intended for transmission to, or receipt by, any
>> unauthorized person. The use, distribution, transmittal or
>> re-transmittal by an unintended recipient of this communication is
>> strictly prohibited without our express approval in writing or by
>> e-mail. If you are not the intended recipient of this e-mail, please
>> delete it from your system without copying it and notify the above
>> sender

> so that our e-mail address may be corrected.

>> Receipt by anyone other than the intended recipient is not a waiver
>> of any attorney-client or work product privilege.

>>



Rental - First American Title and Escrow-41584-

AMC Contact Information: Theatre Contact Michelle Goff Hourly Manager MGoff@amctheatres.com Rentals Contact Coordinator Name Coordinator Contact # Coordinator Email	Theatre Details: Alderwood 16 - 2629 18733-33RD AVE. WEST LYNWOOD, WA 98037 Phone 425-921-2985 Fax 425-921-2986 Email 2629@amctheatres.com	Rental Organization Contact First American Title and Escrow Sara Christensen 2707 Colby Ave, Suite 601 Everett, WA, 98201 425-551-4840 (Phone) 866-859-0436 (Fax) schristensen@firstam.com
---	---	--

Event Details

Event Start Date: 11/6/2013	<i>Event Schedule</i>	
Additional Dates:	Site Access:	11:00AM
	Walk-in/ Catering / Attendees Arrive:	11:15AM
	Program Starts:	11:30AM
	Program Ends:	1:00PM
	Access Ends:	1:30PM
		\$875

Quantity	Unit Cost	Charges
CUSTOMER COPY		
Tickets for Current Release		0
		0
		0
		0
		0
AV Requestor Microphone	Pay at Theatre	Rental Total :\$ 875

X *[Signature]* Date: 9/19/13 *[Signature]* Date: 9-19-13
 American Multi-Cinema, Inc. *[Signature]*



Rental - First American Title and Escrow-41949-

AMC Contact Information: Theatre Contact Chelsea Atkins Hourly Manager CAtkins@amctheatres.com	Theatre Details: ALDERWOOD 16 - 2629 18733-33RD AVE. WEST LYNNWOOD, WA 98037 Email 2629@amctheatres.com	Rental Organization Contact First American Title and Escrow Sara Christensen 2707 Colby Ave, Suite 601 Everett, WA, 98201 425-551-4840 (Phone) 866-859-0436(Fax) SChristensen@firstam.com
---	--	---

Event Details

Event Start Date: 11/6/2014 10/16/14 Auditorium(s)/Seat Count(s) AUD 3 = 185 Seats Feature Name	Event Schedule Site Access: 10:30am Walk-in/ Catering / Attendees Arrive 11:00am Program Starts 11:30am Program Ends 1:00pm Access Ends
Facility Rental	Alderwood Unit 2629 \$875 18733 33rd Ave W. Lynnwood, WA 98037 CASHIER: 832 8/12/2014 11:00:00 STATION: 000 PR \$100.00 TOTAL \$875.00 ***** AMCI: 88888888888888888888 ADTH: 888888
Line Item No concession items billed Tickets for Current Release Catering Fee	Charges 0 0 0 0 0 0
AV Requests: MIC - 7 speakers	Pay at Theatre Rental Total :\$ 875

Additional Comments:

[Signature]
 American Multi-Cinema, Inc.

Date: 8/12/14

Client Signature

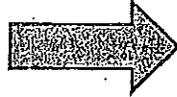
- 8/12/14
 Date:

AMCE/Confidential
 (Initials)

Spokane Mortgage Lenders Association



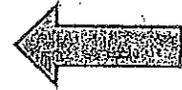
2013 Golf Tournament



Benefiting



casa
PARTNERS



to enhance the lives of abused, neglected and at-risk children and youth

DATE: THURSDAY, June 6th, 2013
TIME: Lunch on deck at noon/Shotgun start at 1:30 pm
WHERE: Downriver Golf Course
3225 N Columbia Circle -- (509) 327-5269

SPONSOR REGISTRATION

(Mark your choice with an "X")

Hole Sponsor: \$180 Activity Sponsor: \$180 _____ Par 3(hole in one) \$250 _____
(Men KP ___ LD ___ Women KP ___ LD ___)

Beverage Cart Sponsor: \$250(+Beverages) _____ Door Prize \$50 or actual cost _____

\$Platinum Sponsor\$ _____ (call Randy or Cory for details)

- Sponsorship includes presence at the hole and ability to offer food and beverage*
- All Sponsors will be honored on the SMLA website and throughout the tournament
 - Sponsor donations are tax-deductible (SMLA Tax ID #911343523)
- All Sponsorships include one (1) lunch -- Additional lunches can be purchased for \$15
*All alcoholic beverages must be purchased through the golf course

COMPANY NAME FIRST AMERICAN TITLE
CONTACT PERSON ALAN YOUNG CONTACT NUMBER 509-220-4612
NO. OF EXTRA LUNCHES (\$15 each) 2 AMOUNT ENCLOSED \$ 210⁰⁰

Make checks payable to SMLA

Visa/MC(only) Credit Card # 4730-7700-0421-4208

Exp 03/13 Billing Zip Code 99202

TOTAL \$ 210⁰⁰

REQUESTING
HOLE 10

Please mail registration form and payment to:

SMLA Golf Tournament/Cory Oberst

Inland Northwest Bank

421 W Riverside

Spokane, WA 99220

To reserve a specific hole or activity please contact:

Randy Cowell (randy.cowell@plazahomemortgage.com) 509.999.5321 or Cory Oberst (coberst@inb.com) 509.879.0237

Expense Report
Report Name : February 2013

Employee Name : Young, Alan M.
Employee ID : 34308

Report Header

Policy Name : First American Expense Policy
Business Purpose : Marketing
Report ID : 980C45A509A04A67A134
Receipts Received : Yes
Report Date : 02/26/2013
Has Exceptions : Yes
Approval Status : Approved
Payment Status : Paid
Currency : US, Dollar

\$ 210

Dues

Transaction Date	Expense Type	Business Purpose	Enter Vendor Name	City	Payment Type	Amount
02/21/2013	Dues	SMLA Golf Tournament	SPOKANE MORTGAGE LEND	Spokane	Corporate Card	\$210.00

LIMITED USE-Source Documents

Transaction Date	Expense Type	Business Purpose	Enter Vendor Name	City	Payment Type	Amount
02/21/2013	LIMITED USE-Source Documents	Marketing	MYFIRSTAM.COM-NW DIVN	Spokane	Corporate Card	\$0.28
02/20/2013	LIMITED USE-Source Documents	Marketing	MYFIRSTAM.COM-NW DIVN	Spokane	Corporate Card	\$0.28
02/13/2013	LIMITED USE-Source Documents	Marketing	MYFIRSTAM.COM-NW DIVN	Spokane	Corporate Card	\$0.28
02/09/2013	LIMITED USE-Source Documents	Marketing	MYFIRSTAM.COM-NW DIVN	Spokane	Corporate Card	\$0.28

https://www.concursolutions.com/Expense/Client/print_cpr.asp?type=1001&opt=PAR_REG&dtl=CHC_... 6/27/2013

ORACLE

Requisition 112049 (159.12 USD)

Report Date 3/13/15 11:49 AM GMT-05:00
Page 1 of 1

Requisitioning BU	BU FAF US	Requisition Amount	159.12 USD
Entered By	Stacy Vaughn	Approval Amount	159.12 USD
Status	Approved	Procurement Card	
Description	Golf Tees and Water Bottles	Justification	
Emergency Requisition	No		

Line	Item	Description	Category Name	Quantity	UOM	Price	Amount (USD)
------	------	-------------	---------------	----------	-----	-------	--------------

1		Golf Tees	Promotional merchandise	1000	Each	0.06 USD	60
---	--	-----------	-------------------------	------	------	----------	----

Requester	Stacy Vaughn	Supplier	TROPHY AWARD COMPANY
Urgent	No	New Supplier	No
Need-by Date	6/3/13	Supplier Site	RIVERSIDE-CA
Deliver-to Location Type	Internal	Supplier Contact	
Deliver-to Location	First American Title	Contact Phone	
Deliver-to Address	40 E Spokane Falls, SPOKANE, WA, 99202, UNITED STATES	Supplier Item	TA355
Destination Type	Expense	Note to Supplier	
Subinventory		Note to Receiver	
Note to Buyer			

Distributions

Distribution	Charge Account	Percentage	Quantity	Amount (USD)
--------------	----------------	------------	----------	--------------

1	1001.622190.00861.053.00000.0.0000.00.00	100	1000	60
---	--	-----	------	----

Line	Item	Description	Category Name	Quantity	UOM	Price	Amount (USD)
------	------	-------------	---------------	----------	-----	-------	--------------

2		Water Bottle - 16.9 oz.	Promotional merchandise	168	Each	0.59 USD	99.12
---	--	-------------------------	-------------------------	-----	------	----------	-------

Requester	Stacy Vaughn	Supplier	TROPHY AWARD COMPANY
Urgent	No	New Supplier	No
Need-by Date	6/3/13	Supplier Site	RIVERSIDE-CA
Deliver-to Location Type	Internal	Supplier Contact	
Deliver-to Location	First American Title	Contact Phone	
Deliver-to Address	40 E Spokane Falls, SPOKANE, WA, 99202, UNITED STATES	Supplier Item	TA-119
Destination Type	Expense	Note to Supplier	
Subinventory		Note to Receiver	
Note to Buyer			

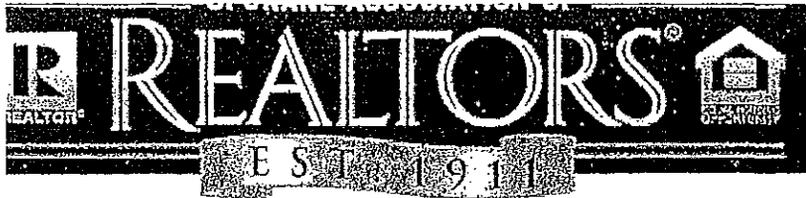
Distributions

Distribution	Charge Account	Percentage	Quantity	Amount (USD)
--------------	----------------	------------	----------	--------------

1	1001.622190.00861.053.00000.0.0000.00.00	100	168	99.12
---	--	-----	-----	-------

End of Report

SMLA golf hand out 2013



Order Summary - (7/3/2013)

Bill To:

White, Jessica (871014255)

Spokane, WA 99202

Office: First American Title

Remit to:

SPOKANE ASSOCIATION OF REALTORS®

1924 N Ash St

Spokane, WA 99205

Ship To:

Not Applicable

Order:

Shipping Date: Not Applicable

Shipping Method: Not Applicable

Payment Terms: On Receipt

Order Details - ORD-20107-S7S1H7

Product	Qty	Price	Tax	Discount	Total
5059 - Golf Tournament-Donation(odd)	1	\$150.00	\$0.00	\$0.00	\$150.00

Subtotal: \$150.00
 Tax: \$0.00
 Discount: \$0.00
 Shipping: \$0.00
Total: \$150.00

Payments

Date	Method	Transaction ID	Card/Check Number	Account Holder	Amount	Unapplied	Refunded	Applied to Order
07/03/2013	Visa	20192586	*****2916	White, Jessica	\$240.00	\$0.00	\$0.00	\$150.00

Total Payments: \$150.00

Order Balance: \$0.00

Spokane Association of REALTORS®, 1924 N Ash Street, Spokane, WA 99205, (509)326-9222

Embroidered Sportswear, Inc.
204 S. Vista Road
Spokane, WA 99212

(509) 926-1221
Fax (509) 826-1248

Sales Invoice # 72797

Date
7/11/2013

Bill To:

FIRST AMERICAN TITLE INS. CO.
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Ship To:

FIRST AMERICAN TITLE INS. CO.
SCOTT FONTE
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Customer ID
FIRST

Purchase Order ID
Tax Exemption ID

<u>Qty Ordered</u>	<u>Description</u>	<u>Qty Shipped</u>	<u>Unit Price</u>	<u>Item Total</u>
	8400 - FOAM CAN COOLIE, YELLOW W/ ROYAL IMPRINT	209.00	\$0.98	\$200.64
	9016 - SET UP	1.00	\$45.00	\$45.00
	OTHER SALES - INBOUND FEDEX GROUND	1.00	\$35.50	\$35.50

JAR golf trolley 2013

Shipping Method Counter Pickup
Salesperson Dustin Warwick
Payment Terms Due upon Receipt
Payment Method No Payment Received
Memo

Subtotal \$281.14
Credit Deduction \$35.17
Sales Tax \$21.40
Freight \$0.00
Total \$267.37
Amount Paid \$0.00
Balance Due \$267.37

A LATE CHARGE which is computed at the periodic rate of 1 1/2% monthly (ANNUAL PERCENTAGE RATE 18%) may be assessed on any amount due, which remains unpaid 30 days or more, after applying payments and credits.

Embroidered Sportswear, Inc.
204 S. Vista Road
Spokane, WA 99212

**** INVOICE ****
INV# 72788
DATE
7/11/2013

Bill to:

FIRST AMERICAN TITLE INS. CO.
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Ship to:

FIRST AMERICAN TITLE INS. CO.
SCOTT FONTE
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Customer ID: FIRST
Customer PO#
Salesperson: Dustin Warwick

SHIP VIA: Counter Pickup
TERMS: No Payment Terms

CONTACT: _____

PHONE#: _____

MEMO

<u>Qty. Ordered</u>	<u>Description</u>	<u>Qty. Shipped</u>	<u>Unit Price</u>	<u>Item Total</u>
Each	8400 - EVERGREEN DRAWSTRING CINCH BACKPACK, RED/W WHITE IMPRINT	254.00	\$1.58	\$401.32
Each	9015 - SET UP	1.00	\$50.00	\$50.00
Each	OTHER SALES - INBOUND UPS	1.00	\$29.58	\$29.58

DISCOUNT FOR BOTH ORDERS REFLECTED ON INVOICE 72797

SAR golf tourney 2013

OKAY

A LATE CHARGE which is computed at the periodic rate of 1 1/2% monthly (ANNUAL PERCENTAGE RATE 18%) may be assessed on any amount due, which remains unpaid 30 days or more, after applying payments and credits.

RECEIVED IN GOOD CONDITION: signature _____

Subtotal \$480.90
Freight \$0.00
Sales Tax \$41.84
Total \$522.74
Deposit _____
Balance Due _____

Receipt from SMLA Spokane

Square [noreply@messaging.squareup.com]

Sent: Tuesday, April 15, 2014 4:21 PM

To: Fonte, Scott

*SMLA
Golf 2014*



SMLA Spokane

Apr. 15, 2014 at 4:20pm

55° F

\$210.00

3 Items

Receipt #IM48

SMLA Golf SPONSOR

\$180.00 ✓

SMLA Golf Lunch x 2

\$30.00

(\$15.00 ea.)

Total

\$210.00

Visa 5137

VISIT US AT

PO Box 4421

Spokane, WA 99201

(509) 768-2722



© 2014 Square, Inc. All rights reserved.

1455 Market Street, Suite 600, San Francisco, CA 94103

[Square Privacy Policy](#)

[Not your receipt?](#)

Invoice # 00032

Invoice details

Balance due \$0.00
 Amount \$150.00
\$150.00 paid on 16 Apr 2014
 Invoice # 00032
 Date 16 Apr 2014
 Origin Event registration
 2014 Traders Club Golf Tournament (Downriver Golf Course -
 3225 N Columbia Cir, Spokane, WA 99205)
 Invoiced to Scott Fonte, First American Title
 sfonte@firstam.com

Item	Amount
Registration for "2014 Traders Club Golf Tournament" (17 Jun 2014 1:30 PM - 5:30 PM (PDT), Downriver Golf Course - 3225 N Columbia Cir, Spokane, WA 99205), Hole Sponsorship	\$150.00
Invoice total	\$150.00

Traders Golf
Invoice 2014



Order Summary - (7/3/2014)

Bill to:

Fonte, Scott (871011436)
 40 E Trent
 Spokane, WA 99202
 Office: First American Title

Remit to:

SPOKANE ASSOCIATION OF REALTORS®
 1924 N Ash St
 Spokane, WA 99205

Ship to:

Not Applicable

Order:

Shipping Date: Not Applicable
 Shipping Method: Not Applicable
 Payment Terms: On Receipt

Order Details - ORD-41143-G3H8K9

Product	Qty	Price	Tax	Discount	Total
5008 - Golf Tourn Donation (even yrs)	1	\$150.00	\$0.00	\$0.00	\$150.00

Subtotal: \$150.00
 Tax: \$0.00
 Discount: \$0.00
 Shipping: \$0.00
Total: \$150.00

Payments

Date	Method	Transaction ID	Card/Check Number	Account Holder	Amount	Unapplied	Refunded	Applied to Order
07/03/2014	Check		29199675	Fonte, Scott	\$150.00	\$0.00	\$0.00	\$150.00

Total Payments: \$150.00

Order Balance: \$0.00

Spokane Association of REALTORS®, 1924 N Ash Street, Spokane, WA 99205, (509)326-9222



DISBURSEMENT FORM

Date Submitted:	6/2/2014	REQUIRED** Payment Needed by date:	6/9/2014
Requesting Branch:	Spokane	State:	WA
Payee	Spokane Association of Realtors	Phone Number	509-326-9222
Address	1924 N. Ash		
City	Spokane	State	WA
		Zip	99205
Check Request Reason/Explanation:	Spokane Association of Realtors Golf Tournament Hole Sponsor		

PAYMENT TYPE:		W-9** SEE BELOW
<input checked="" type="checkbox"/> CHECK	<input type="checkbox"/> Attached	
<input type="checkbox"/> WIRE (REQUIRED attach wiring instructions)	<input checked="" type="checkbox"/> On- File	
<input type="checkbox"/> EFT (REQUIRED attach EFT Funds Transfer Form on separate sheet)	<input type="checkbox"/> Not	
<input type="checkbox"/> International Wire (REQUIRED attach wiring instructions on separate sheet)		
**All suppliers are required to have completed W9 form on file prior to payment. Exceptions to this rule are claim settlement checks and refunds, non-profit organizations, government, claims, or refunds. If W9 is not submitted with this request, the FSC will make every effort to obtain the W9 from the payee; please note payment will not be disbursed until W9 is received.		

REQUESTOR		AUTHORIZED APPROVAL (CANNOT BE REQUESTOR)	
Name (print):	Scott Fonte	Name (print):	Janie Smith
Phone:	(509) 835-8943	Phone:	(509) 835-8990
Email:	sfonte@firstam.com	Email:	janiesmith@firstam.com
Signature	<i>Scott Fonte</i>	Signature	<i>Janie Smith</i>

PAYMENT INFORMATION: (Please fill in GL String and attach second page if needed)				
Check Amount: \$	150.00	Check Print Description (25 Character Max):		
Write out check amount:	One hundred fifty dollars and 00/100			
GL Distribution Coding:				
Company Code	GL Account	Cost Center	Territory	Amount \$
1001		04745	053	150.00

WHERE SHOULD THIS CHECK BE SENT/PRINTED?			
(CORPORATE CHECKS ONLY as allowed in SOP) Remote Printer:			
Mail check to:	<input type="checkbox"/> Payee	<input checked="" type="checkbox"/> Requestor- Address required	<input type="checkbox"/> Other- Please specify below
Shipping:	<input type="checkbox"/> Regular Mail	<input checked="" type="checkbox"/> FED-EX	Other:
Name/Address:	Scott Fonte	40 E. Spokane Falls Blvd	
City/State/zip	Spokane	WA	99202
Special Instructions:	Please send asap. Thank you.		

PLEASE SUBMIT TO ONE OF THE FOLLOWING:		
Phoenix FSC:	Email: checkreq.sw@firstam.com	Fax: 066-806-3404
Tallahassee FSC:	Email: se.laccounting@firstam.com	Fax: 066-806-3473
CORPORATE processing:	Email: uccorp.ap@firstam.com	Fax: N/A

Embroidered Sportswear, Inc.
204 S. Vista Road
Spokane, WA 99212

Sales Invoice # 75724

(509) 926-1221
Fax (509) 926-1248

Date
7/16/2014

Bill To:

FIRST AMERICAN TITLE INS. CO.
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Ship To:

FIRST AMERICAN TITLE INS. CO.
JESSICA 688-4168
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Customer ID
FIRST

Purchase Order ID
Tax Exemption ID

<u>Qty Ordered</u>	<u>Description</u>	<u>Qty Shipped</u>	<u>Unit Price</u>	<u>Item Total</u>
150	8400 - THE RIVIERA SUNGLASSES, YELLOW W/ NAVY IMPRINT	150.00	\$1.59	\$238.50
1	9015 - SET UP CHARGE	1.00	\$50.00	\$50.00
1	OTHER SALES - INBOUND FEDEX	1.00	\$21.61	\$21.61

STAR golf tourney 2014
SMUA golf tourney 2014

*used items
for both*

Shipping Method Federal Express
Salesperson Dustin Warwick
Payment Terms Due upon Receipt
Payment Method No Payment Received
Memo

Subtotal \$310.11
Credit Deduction \$23.08
Sales Tax \$24.97
Freight \$0.00
Total \$312.00
Amount Paid \$0.00
Balance Due \$312.00

A LATE CHARGE which is computed at the periodic rate of 1 1/2% monthly (ANNUAL PERCENTAGE RATE 18%) may be assessed on any amount due, which remains unpaid 30 days or more, after applying payments and credits.

Embroidered Sportswear, Inc.
204 S. Vista Road
Spokane, WA 99212

Sales Invoice # 75720

(509) 926-1221
Fax (509) 926-1248

Date
7/18/2014

Bill To:

FIRST AMERICAN TITLE INS. CO.
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Ship To:

FIRST AMERICAN TITLE INS. CO.
JESSICA 688-4168
40 E SPOKANE FALLS BLVD
SPOKANE, WA 99202

Customer ID
FIRST

Purchase Order ID
Tax Exemption ID LOC 3210

<u>Qty Ordered</u>	<u>Description</u>	<u>Qty Shipped</u>	<u>Unit Price</u>	<u>Item Total</u>
150	8400 - 6" YELLOW WATER GUN, YELLOW W/ NAVY IMPRINT	150.00	\$1.45	\$217.50
1	9015 - SET UP	1.00	\$50.00	\$50.00

SAR golf tourney 2014
SMIA golf tourney 2014
used items for both

Shipping Method: Federal Express
Salesperson: Dustin Warwick
Payment Terms: Due upon Receipt
Payment Method: No Payment Received
Memo: CUSTOMER FEDEX ACCT USED

Subtotal	\$287.50
Credit Deduction	\$21.40
Sales Tax	\$21.41
Freight	\$0.00
Total	\$287.51
Amount Paid	\$0.00
Balance Due	\$287.51

A LATE CHARGE which is computed at the periodic rate of 1 1/2% monthly (ANNUAL PERCENTAGE RATE 18%) may be assessed on any amount due, which remains unpaid 30 days or more, after applying payments and credits.



First American Title™

Economic Forecast for 2014 with Zillow

Please join SCCAR and First American Title and Escrow for a timely presentation with Dr. Svenja Gudell, the Senior Economist for Zillow.

Our industry has become very familiar with Zillow in the last few years. Svenja joined Zillow in 2011 and is currently working on negative equity valuations and forecasting. She spends time in foreclosure research and collaborates as a researcher with other organizations and academics. Svenja completed her Ph.D. in Finance from the University of Rochester. Before starting her Ph.D. program, Svenja worked for Analysis Group in Boston, participating with various teams working on economic, financial and strategy consulting projects. She also worked at the Federal Reserve Bank of New York, where she was an Assistant Economist in the International Research Group.

You'll find Svenja's presentation helpful in understanding where we are today in the economic recovery in our area, and more importantly, where we are going.



Event Information...

DATE: Wednesday, November 6, 2013

TIME: Registration begins at 11:00 a.m.

ECONOMIC FORECAST
11:30 a.m. - 1:00 p.m.

LOCATION: AMC Loew's Cineplex 16 Alderwood
18733 33rd Avenue W
Lynnwood, WA 98037
Auditorium #3

Lunch will be served.

RSVP: Save your seat by emailing
cs.snoco.wa@firstam.com or by
calling 425.551.4117

PRESENTER:



DR. SVENJA GUDELL
SENIOR ECONOMIST
FOR ZILLOW

2014 Trade Association Events

County	Group/Trade Association	Date	Event	Sponsorship Amount	Itemized Expenses	Total Amount Spent	Name of presenter (if applicable)	Additional Details
Chelan County	NCW (North Central Washington) Association of Realtors	1/14/2014	Installation Banquet	50.00	\$50 sponsorship; \$175 for attendees (5 x \$35)	225.00	N/A	
Chelan County	NCW (North Central Washington) Association of Realtors	6/19/2014	Realtor Fun Night	300.00	\$300 sponsorship, \$25 for additional tickets (13 attendees)	625.00	N/A	This was in Chelan
Chelan County	NCW (North Central Washington) Association of Realtors	9/25/2014	Realtor Fun Night	\$			N/A	This was in Wenatchee
Clark County	Builder Industry Association (BIA)	6/19/2014	Comedy Night	250.00		250.00	N/A	
King County	Women's Counsel of Realtors	10/11/2014	Masquerade Ball	1000.00		1000.00	N/A	
Kitsap County	KCAR (Kitsap County Association of Realtors)	8/15/2014	Putt Putt	100.00	\$100 sponsorship, \$50.07 drinks	150.07	N/A	
Pierce County	MBA (Master Builder's Association of Pierce County)	3/27/2014	Rebuilding Together Auction	1000.00		1000.00	N/A	
Pierce County	TPCAR (Tacoma Pierce County Association of Realtors)	7/24/2014	Golf Tournament	1000.00		1000.00	N/A	
Snohomish County	SCAR (Snohomish Camano Association of Realtors)	10/16/2014	Zillow 2015 Economic Forecast	875.00	\$875 AMC Theater Rental	875.00	N/A	
Spokane County	Spokane Mortgage Lender's Association	6/5/2014	Golf Tournament	150.00	\$150 sponsorship, \$30 for additional employee lunches.	210.00	N/A	Hole Sponsor \$150; sponsorship included lunch for one attendee of sponsor. Also paid for 2 additional lunches for First American attendees (this is permitted per WAC 284-29-220, 3).
Spokane County	Spokane Traders Club	6/17/2014	Golf Tournament	150.00		150.00	N/A	
Spokane County	Spokane Association of Realtors	6/17/2014	Golf Tournament	150.00	\$150 sponsorship, \$579.51 self-promotional items	729.51	N/A	Hole Sponsor \$150; also gave away self-promotional items (\$579.51)
Thurston County Association of Realtors	Thurston County Association of Realtors	7/25/2014	Softball Tournament	233.15	\$233.15 in snacks	233.15		
Thurston County Association of Realtors	Thurston County Association of Realtors	9/10/2014	Golf Tournament	350.00	\$350 sponsorship (Clubhouse), \$11.96 snacks provided	361.96		
Whatcom County	Whatcom Association of Realtors	9/7/2014	Golf Tournament	300.00		300.00	N/A	
Yakima County	Yakima Association of Realtors	1/24/2014	YAR Installation Banquet	100.00	\$100 sponsorship, \$35 for additional attendees (10 x \$35 = \$350)	450.00	N/A	Sponsorship \$100. Also paid for 10 employees to attend dinner (this is permitted per WAC 284-29-220, 3).
Yakima County	Yakima Association of Realtors	9/11/2014	YAR Golf Tournament	150.00		150.00	N/A	

2013 Trade Association Events

County	Group/Trade Association	Date	Event	Sponsorship Amount	Itemized Expenses	Total Amount Spent	Name of presenter (if applicable)	Additional Details
Statewide Event* Taking one opportunity out of three from each county in 2013	AREAA (Washington State Real Estate Association of America)	7/10/2013	Summer Networking	1000.00		1000.00	N/A	
Chelan County	NCW (North Central Washington Association of Realtors)	6/20/2013	Golf Tournament	100.00		100.00	N/A	
Chelan County	NCW (North Central Washington Association of Realtors)	9/19/2013	Realtor Fun Night	150.00		150.00	N/A	"Stage" sponsorship
Clark County	Builder Industry Association (BIA)	7/17/2013	Parade of Homes	500.00		500.00	N/A	
King County	NAHREP (National Association of Hispanic Real Estate Professionals) Seattle Chapter	8/22/2013	Business Rally	1000.00	\$1000 sponsorship, \$78.84 in self-promotional flyer print cost, \$3.82 gift shop tape, \$45 internet access fee to have MFA demonstrations	1127.66	N/A	The flyers were "real estate terms in english and spanish" and were self-promotional; internet access did not necessarily "benefit" trade association members but were more of a benefit to the title company. This print, tape, and internet fee spend was not approved through Sari Conrad's process.
King County	King County Women's Counsel of Realtors	10/11/2013	2014 Masquerade Ball	1000.00		1000.00	N/A	
Kitsap County	KCAR (Kitsap County Association of Realtors)	8/16/213	Putt Putt	75.00		75.00	N/A	
Pierce County	TPCAR (Tacoma Pierce County Association of Realtors)	7/25/2013	Golf Tournament	1000.00		1000.00	N/A	
Snohomish County	SCAR (Snohomish Camano Association of Realtors)		Zillow Economic Forecast	875.00	\$875 AMC Theater Rental	875.00	N/A	
Spokane County	Spokane Mortgage Lender's Assodation	6/6/2013	Golf Tournament	180.00	\$180 sponsorship, \$30 for additional employee lunches. \$159.12 self-promotional items.	369.12	N/A	Hole 10 Sponsor \$180; sponsorship included lunch for one attendee of sponsor. Also paid for 2 additional lunches for First American attendees (this is permitted per WAC 284-29-220, 3). Also gave away self-promotional items (\$159.12)
Spokane County	Spokane Association of Realtors	7/18/2013	Golf Tournament	150.00	\$150 sponsorship, \$790.11 self-promotional items	940.11	N/A	
Thurston County	Thurston County Association of Realtors	7/19/2013	Softball Tournament Snack Sponsor	175.06	\$176.06 in snacks	176.06	N/A	
Thurston County	Thurston County Association of Realtors	9/12/2013	Golf Tournament	350.00		350.00	N/A	
Whatcom County	Whatcom Association of Realtors	9/8/2013	Golf Tournament	300.00		300.00	N/A	\$300 for

2014 Trade Association Events

County	Group/Trade Association	Date	Event	Sponsorship Amount	Itemized Expenses	Total Amount Spent	Name of presenter (if applicable)	Additional Details
Yakima County	Yakima Association of Realtors	1/16/2015	YAR Installation Banquet	\$100	\$100 sponsorship, \$35 for additional attendees (10 x \$35 = \$350)	\$450	N/A	Sponsorship \$100. Also paid for 10 employees to attend dinner (this is permitted per WAC 284-29-220, 3).

WHATCOM COUNTY ASSOCIATION
OF REALTORS

3317 NORTHWEST AVENUE
BELLINGHAM, WASHINGTON 98225
(360) 671-5477

INVOICE

DATE 7/11/2013	INVOICE JY1311
-------------------	-------------------

TO Tammy Walker
First American Title Company
11 Bellwether Way, Suite 301
Bellingham, WA. 98225



QTY	DESCRIPTION	UNIT PRICE	LINE TOTAL
1	2013 Golf Tournament Tee Sponsorship		\$300.00
<i>THANK YOU FOR YOUR SUPPORT OF THE WHATCOM COUNTY ASSOCIATION OF REALTORS®</i>			
SUBTOTAL			300.00
SALES TAX			
TOTAL			300.00

Make all checks payable to WCAR
THANK YOU

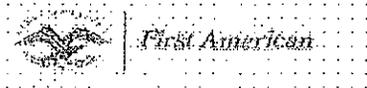
Mudbool, Sangamesh B.

From: Walker, Tammy
Sent: Thursday, July 25, 2013 5:22 AM
To: TISW-RA-SW-BIC Midwest AP
Subject: Invoice for WCAR to be paid for Whatcom County
Attachments: 2013 Golf Tee Sponsorship - First American Title.pdf

Attached is an invoice from WCAR for a Golf Sponsorship that will need to be paid.

Thanks
Tammy

Tammy Walker
Whatcom County Manager



First American Title
11 Bellwether Way, Suite 301, Bellingham, WA 98225
Direct: 360-752-7444
Fax: 866-441-7422
Tollfree: 1-800-282-6997
Email: tjwalker@firstam.com

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family of companies | NYSE: FAF

WHATCOM COUNTY ASSOCIATION
OF REALTORS

3317 NORTHWEST AVENUE
BELLINGHAM, WASHINGTON 98225
(360) 671-5477

INVOICE

DATE	INVOICE
07/25/2014	071414

TO First American Title
Tammy Walker
Bellingham, WA 98226



QTY	DESCRIPTION	UNIT PRICE	LINE TOTAL
1	Golf Tournament Sponsorship- Hole Tee Sponsor		300.00
<i>THANK YOU FOR YOUR SUPPORT OF THE WHATCOM COUNTY ASSOCIATION OF REALTORS®</i>			
SUBTOTAL			300.00
SALES TAX			
TOTAL			300.00

Make all checks payable to WCAR
THANK YOU

Palanisamy, Lavanya

From: Walker, Tammy
Sent: Saturday, July 26, 2014 3:37 AM
To: TISW-RA-SW-BIC Midwest AP
Subject: Invoice from WCAR for a Golf Sponsorship
Attachments: First American Title hole sponsor 2014.pdf

Categories: NWD

Attached is an invoice from WCAR for a Golf Sponsorship that will need to be paid.

Thank you.
Tammy

Tammy Walker
Whatcom County Manager



First American

First American Title Insurance Company... it's a good place to be!

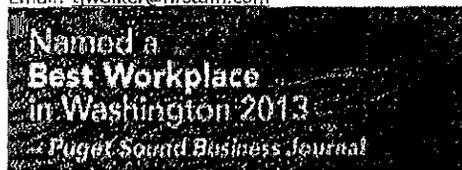
11 Bellwether Way, Suite 301, Bellingham, WA 98225

Direct: 360-752-7444

Fax: 866-441-7422

Tollfree: 1-800-282-6997

Email: tjwalker@firstam.com



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family of companies | NYSE: FAF

YAKIMA ASSOC. OF REALTORS
2707 RIVER RD
VANINA WA 98902
509-457-8191

Merchant ID: 422365791804840
ref ID: 5802

Sale
Golf

XXXXXXXXXXXX2526
Entry Method: Swiped
Approved: Online Batch#: 000004
08/08/14 07:26:29
Inv#: 00000001 Appr Code: 061525
Total: \$ 150.00

Customer Copy
THANK YOU!

Golf =
Holesponsor

10x35 = 350 Dinner

FB

100th Diner

100th Diner
YAKIMA ASSOC. OF SCHOLARS
2787 RIVER RD
YAKIMA WA 98902
509-457-8151

Merchant ID: 422369791884545
Term ID: SC02

Sale

VISA
XXXXXXXXXXXX2526

Entry Method: Swiped

Approved: Online Batch#: 000008

01/21/14 09:20:48

Inv#: 00000001 Appr Code: 063143

TOTL: 350.00

Customer Copy
THANK YOU!

(35x10) Dinner

1st Dinner

Dinner for

PARINA ASSOC. OF NEBRASKA
2787 RIVER RD
YARINA IA 58582
585-457-8131

PARINA ASSOC. OF NEBRASKA
2787 RIVER RD
YARINA IA 58582
585-457-8131

Merchant ID: 4223597910084945
Term ID: SC02

Merchant ID: 4223597910084945
Term ID: SC02

VISA

VISA

Sale

Sale

XXXXXXXXXXXX2526

Entry Method: Swiped

Approved: Online

01/22/15

Batch#: 000001

10:56:05

Invt#: 0000002

Appr Code: 018719

Total: \$ 350.00

Customer Copy
THANK YOU!

XXXXXXXXXXXX2526

Entry Method: Swiped

Approved: Online

01/22/15

Batch#: 000001

10:58:05

Invt#: 0000003

Appr Code: 033598

Total: \$ 100.00

Customer Copy
THANK YOU!



2014 Economic Forecast Event

Economic Forecast for 2015 with Zillow® Snohomish County-Camano Association of Realtors®



Event Information...

DATE: Thursday, October 16, 2014

TIME: Registration begins at 11:00 a.m.

ECONOMIC FORECAST
11:30 a.m. - 1:00 p.m.

LOCATION: AMC Loew's Cineplex 16 Alderwood
18733 33rd Avenue W
Lynnwood, WA 98037

Lunch will be served.

RSVP: Please save your seat and help us
plan for lunch.

Email cs.snoco.wa@firstam.com
or Call 425.551.4117

PRESENTER:



DR. KRISHNA RAO, PH.D
ZILLOW ECONOMIST

The Zillow brand has become one of the most familiar names associated with real estate. Dr. Krishna Rao, Ph.D, economist at Zillow, joined the company in the summer of 2013 after finishing a Ph.D. in Economics at Stanford University focused on Macroeconomics and Finance. Prior to Zillow, Krishna also worked at the Federal Reserve Bank of New York where he helped develop structural macroeconomic forecasting models to guide monetary policy. At Zillow, Krishna works on forecasting home prices, analyzing real estate market conditions and future market trends.

Krishna's presentation will give us insight for current market conditions and what we can expect for housing in our area next year.

This event is complimentary and is sponsored by First American Title



First American Title™

206.947.6754 | www.firstam.com

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WA - 06/2014

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1
2 **BEFORE THE STATE OF WASHINGTON**
3 **OFFICE OF THE INSURANCE COMMISSIONER**

4 *In the Matter of*

5 FIRST AMERICAN TITLE
6 INSURANCE COMPANY,

7 Authorized Title Insurer.

Docket No. 15-0166

WA OIC# 461

NAIC NO. 50814

OIC'S ANSWERS AND RESPONSES TO
FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS OF FIRST AMERICAN
TITLE INSURANCE COMPANY

11 **INTERROGATORIES AND REQUESTS FOR PRODUCTION**

12
13 **INTERROGATORY NO. 1:** Identify each person who participated in or
provided information used in answering these discovery requests.

14 **ANSWER:** Marcia Stickler and Renee Molnes.

15
16 **INTERROGATORY NO. 2:** Identify each and every person employed by or on
behalf of the OIC who participated in any aspect of the OIC investigation or
17 decision to assess a fine against First American and briefly describe the role of
each such person.

18 **ANSWER:** Barry Walden, OIC Investigator. Mr. Walden investigated the
19 complaint against First American; Mark Durphy, Investigations Manager. Mr.
20 Durphy reviewed Mr. Walden's investigation and referred the matter for
enforcement; and Marcia Sticker, Insurance Enforcement Specialist, prepared
21 the memo for the Compliance Committee and presented the matter there. She
drafted the request for hearing and spoke briefly with complainant Chris
22 Schulz.

23 **INTERROGATORY NO. 3:** Identify what person or persons at the OIC made
24 the decision to assess a \$100,000 fine against First American.

25 **ANSWER:** Marta DeLeon, AnnaLisa Gellermann, John Hamje, Molly Nollette,
Jason Siems, Steve Valandra, and Jim Odiome,

1 INTERROGATORY NO. 4: Describe in detail how the OIC determined the
2 amount of the fine for the alleged WAC violations contained in the Notice of
Hearing and in connection therewith:

- 3 a. Identify every person who participated in this determination;
4 b. The dates of their participation; and
5 c. The methodology, if any, by which the amount of the fine was determined.

6 ANSWER: a) Marta DeLeon, AnnaLisa Gellermann, John Hamje, Molly Nollette,
7 Jason Siems, Steve Valandra, and Jim Odiorne; b) June 30, 2015; c) Consistency
8 with other enforcement actions; Impact of violations — on consumers, on
9 marketplace, etc. — frequency, severity, extent of violations — extent to which a
10 violator gained a competitive advantage through the violation(s); Prior conduct of
11 company; Statutory maximums/minimums; Whether violations were
12 intentional/grossly negligent/negligent, etc.; Whether the enforcement action
13 contemplated is likely to be viewed by respected elements of the industry, when all
14 facts are known, as reasonable; Financial stability of the company; Policy
15 implications; Company's cooperation with regulators — for example, did company
16 bring problem to regulator's attention; what is company's commitment to
17 compliance and what demonstrated steps has it taken toward achieving compliance;
18 did company tell regulators the truth about a situation during the investigative phase
19 or at the time of the occurrence; Cost to agency of investigation and enforcement
20 action

21 INTERROGATORY NO. 5: State each and every fact upon which you base
22 your allegation that First American entered into an "agreement, arrangement,
23 scheme...designed to avoid RCW 48.29.210 and WAC 284-29-200, and in
24 connection therewith identify:

- 25 a. Every person having knowledge of such facts; and
26 b. All documents that you contend supports this allegation.

ANSWER: The Commissioner objects to this interrogatory on the basis that it
requests information that requires the Commissioner to render a legal conclusion,

1 constitutes an impermissible invasion of the opinions, mental impressions and
2 theories of counsel, and requires the Commissioner to put on a dress rehearsal for
3 the hearing. See *Webb v. Biddle*, 72 Wn.2d 22, 431 P.2d 705 (1967). The
4 Commissioner also objects to this interrogatory on the basis that the request for the
5 Commissioner to "state each and every fact" is ambiguous, vague, unreasonably
6 broad and unduly burdensome. See e.g., *Steil v. Humana Kansas City, Inc.*, 197
7 F.R.D. 445 (D. Kan. 2000); *Safeco of America v. Rawston*, 181 F.R.D. 441, 447 (C.
8 D.Cal. 1998); *Lawrence v. First Kansas Bank & Trust Co.*, 169 F.R.D. 657, 663
9 (D. Kan. 1996).

7 **REQUEST FOR PRODUCTION NO. 1:** Produce all documents in any way
8 related to the subject matter of the Interrogatory immediately above.

9 **RESPONSE:** Undated Jim Tompkins email – Exhibit 1D to OIC investigative
10 file previously provided.

11 **INTERROGATORY NO. 6:** State each and every fact upon which you base
12 your allegation in paragraph A2 of the Notice of Hearing that "First American
13 would take care of all planning and execution of the event but it would be
14 technically a 'trade association event' under WAC 284-29-220."

15 **ANSWER:** The Commissioner objects to this interrogatory on the basis that it
16 requests information that requires the Commissioner to render a legal conclusion,
17 constitutes an impermissible invasion of the opinions, mental impressions and
18 theories of counsel, and requires the Commissioner to put on a dress rehearsal for
19 the hearing. See *Webb v. Biddle*, 72 Wn.2d 22, 431 P.2d 705 (1967). The
20 Commissioner also objects to this interrogatory on the basis that the request for the
21 Commissioner to "state each and every fact" is ambiguous, vague, unreasonably
22 broad and unduly burdensome. See e.g., *Steil v. Humana Kansas City, Inc.*, 197
23 F.R.D. 445 (D. Kan. 2000); *Safeco of America v. Rawston*, 181 F.R.D. 441, 447
24 (C.D. Cal. 1998); *Lawrence v. First Kansas Bank & Trust Co.*, 169 F.R.D. 657, 663
25 (D. Kan. 1996).

22 **INTERROGATORY NO. 7:** Identify every person having information in
23 support of the allegations quoted in the Interrogatory immediately above.

24 **ANSWER:** Matthew Wahlquist, Ryan McIrvine, Ruth Hopkins, Sara Christensen,
25 Chris Schulz, Earl Schmidt, and Barry Walden.

26

1 **REQUEST FOR PRODUCTION NO. 2:** Produce all documents and records
2 in any way related to the allegations contained in the Interrogatory next above.

3 **RESPONSE:** Included in OIC Discovery produced on July 28, 2015.

4
5 **INTERROGATORY NO. 8:** In connection with the allegations in paragraph
6 B3 in the Notice of Request for Hearing, identify each and every affiliate
7 member you contend was excluded from the subject event.

8 **ANSWER:** All affiliate members of SSCAR that were competitors with FATIC.
9 The Commissioner does not contend that some affiliate members of SSCAR would
10 have been "excluded," had they shown up at the event, but that individual
11 invitations were not sent to them if they were a competitor with FATIC, including
12 Old Republic Title in Everett. The attendee list does not indicate that any
13 competitors of FATIC attended.

14
15 **REQUEST FOR PRODUCTION NO. 3:** Produce all documents which you
16 contend supports the allegation referenced in the Interrogatory next above.

17 **RESPONSE:** Included in OIC Discovery produced on July 28, 2015.

18
19 **INTERROGATORY NO. 9:** Identify the specific statutory authority or
20 regulation which you claim authorizes the OIC to assess \$100,000 fine in
21 connection with this proceeding.

22 **ANSWER:** RCW 48.29.210 prohibits the giving of anything of value to a producer
23 of title insurance business except as permitted under rules adopted by the
24 Commissioner. The OIC alleges that FATIC gave 270 producers of title insurance
25 business an educational seminar not in keeping with the rules in WAC 284-29. As
26 such, FATIC is subject to RCW 48.05.140 and RCW 48.05.185. A sanction is
permitted under RCW 48.05.140 if the insurer "fails to comply with *any* provision
of this code." RCW 48.05.185 allows a fine of between \$250 and \$10,000 for such
failure, in lieu of or in addition to other sanctions. Since a single occurrence of a
rule violation justifies suspension or revocation, and the ability to suspend or revoke
justifies a \$250-\$10,000 fine, each occurrence of a violation justifies an individual
fine of \$250 to \$10,000. This interpretation is entitled to deference as the OIC

1 administers the statutes involved. *Bailey v. Allstate*, 73 Wn. App, 442, 447 (1994);
2 also *Port of Seattle v. Pollution Control Board*, 151 Wn.2d 568, 612 (2004).

3 FATIC is not subject to double jeopardy. The scope of the violation, as
4 defined by the Legislature is considered a unit of prosecution. Although FATIC is
5 alleged to have given just one unauthorized educational seminar, each attendee
6 receiving the free class was given a thing of value not in keeping with the
7 regulations. The unit of prosecution then, is each producer of title insurance that
8 wrongly was given the seminar. *State v. Reeder*, No. 90577-1, December 17, 2015.
9 Thus, the maximum fine could have been \$2,700,000.

10 **INTERROGATORY NO. 10:** Identify all fines assessed by the OIC since 2008
11 for alleged violations of WAC 284-29-200 through WAC 284-29-265, and as to
12 each list:

- 13 a. The proceeding or cause number;
- 14 b. The date the fine was assessed; and
- 15 c. The amount of the fine.

16 **ANSWER:** Inasmuch as administrative orders do not have precedential value and
17 are decided on a case-by-case basis, the Commissioner objects to this interrogatory
18 as irrelevant and not reasonably calculated to lead to the discovery of admissible
19 evidence. The Commissioner also objects because Respondent seeks
20 information that is as available to Respondent as to the Commissioner on the OIC
21 website. See *Snohomish County Public Transportation Benefit Area v. The Public
22 Employment Relations Commission et al.* 173 Wn. App. 504 (2013)

23 **INTERROGATORY NO. 11:** Identify all fines assessed by the OIC since
24 2008 for alleged violations of RCW 48.29.210 and list:

- 25 d. The proceeding or cause number;
- 26 e. The date the fine was assessed; and
- f. The amount of the fine.

ANSWER: Inasmuch as administrative orders do not have precedential value and
are decided on a case-by-case basis, the Commissioner objects to this interrogatory
as irrelevant and not reasonably calculated to lead to the discovery of admissible

1 evidence. The Commissioner also objects because Respondent seeks information
2 that is as available to Respondent as to the Commissioner on the OIC website. See
3 *Snohomish County Public Transportation Benefit Area v. The Public Employment
Relations Commission et al*, 173 Wn. App. 504 (2013)

4 **INTERROGATORY NO. 12:** Identify each and every person whom you believe
5 to have any information pertaining to the allegations contained in the notice of
6 hearing in this matter and as to each identify for which allegation or allegations
you believe they have knowledge.

7 **ANSWER:** The Commissioner objects to this interrogatory on the basis that it
8 is vague, ambiguous, calls for speculation and improperly asks the
9 Commissioner to testify to the personal knowledge of other individuals.
10 Without waiving such said objection, the Commissioner's response is: Ruth
11 Hopkins, Chris Shulz, Jim Tompkins, Barry Walden, Jim Fetzer, Ryan McIrvin,
Matthew Wahlquist, Earl Schmidt, and Sara Christensen. See OIC Investigation
Report previously provided.

12 **INTERROGATORY NO. 13:** Identify all persons which the OIC may call as
13 witnesses at the hearing in this matter.

14 **ANSWER:** Ruth Hopkins, Chris Shulz, Jim Tompkins, Barry Walden, Jim
15 Fetzer, Ryan McIrvin, Matthew Wahlquist, Sara Christensen, and Earl Schmidt.

16 **REQUEST FOR PRODUCTION NO. 4:** Please produce all correspondence or
17 written communications of any kind including without limitation email to and
18 from and/or between anyone at the OIC in any way related to the subject matter
of this proceeding.

19 **RESPONSE:** Included in OIC discovery materials produced on July 28, 2015.

20 **REQUEST FOR PRODUCTION NO. 5:** Produce all notes, memorandum,
21 correspondence and emails or other communications or records of any kind
22 between anyone on behalf of OIC and anyone on behalf of First American, in
23 any way related to the subject matter of this proceeding.

24 **RESPONSE:** Included in OIC Discovery produced on July 28, 2015.

25 **REQUEST FOR PRODUCTION NO. 6:** Produce any time records made or
26 maintained by any OIC employee in any way showing time expended in any

1 way related to the subject matter of this proceeding and which shows time spent
2 by each such employee and the dates and description of what work was done
and when.

3 **RESPONSE:** The Commissioner objects to this interrogatory because it seeks
4 information that is not relevant and is not reasonably calculated to lead to the
5 discovery of admissible evidence. Without waiving such objection, the
6 Commissioner responds that he does keep employee time records that show
hours worked each day. The time record does not indicate subject matter
worked on. The Commissioner has no such records concerning this matter.

7
8 **REQUEST FOR PRODUCTION NO. 7:** Produce all written communications of
any form made by any OIC employee within the last five (5) years relating to
9 interpretation of WAC 284-29-200 through WAC 284-29-265.

10 **RESPONSE:** The OIC website has a section devoted to Frequently Asked
11 Questions about the title insurance inducement regulations. See
www.insurance.wa.gov/for-producers/title-insurance/inducement-rules.

12
13 **REQUEST FOR PRODUCTION NO. 8:** Produce all information published
by the OIC within the last five (5) years pertaining to interpretation of WAC
14 284-29-200 through WAC 284-29-265.

15 **RESPONSE:** The OIC website has a section devoted to Frequently Asked
16 Questions about the inducement regulations. See www.insurance.wa.gov/for-producers/title-insurance/inducement-rules.

17
18 **REQUEST FOR PRODUCTION NO. 9:** Produce all information published
by the OIC within the last five (5) years pertaining to interpretation of RCW
19 48.29.210.

20 **RESPONSE:** There are no OIC publications of which we are aware that have
21 interpreted RCW 48.29.210 within the last five years.

22
23 **REQUEST FOR PRODUCTION NO. 10:** Produce all orders issued by
the OIC since 2008 assessing fines for violations of RCW 48.29.210

24
25 **RESPONSE:** Inasmuch as administrative orders do not have precedential value
and are decided on a case-by-case basis, the Commissioner objects to this
26 interrogatory as irrelevant and not reasonably calculated to lead to the discovery

1 of admissible evidence. The Commissioner also objects because Respondent
2 seeks information that is as available to Respondent as to the Commissioner on the
OIC website.

3
4 **REQUEST FOR PRODUCTION NO. 11:** Produce all orders issued by the OIC
5 since 2008 assessing any fines for violations of WAC 284-29-200 through WAC
284-29-265.

6 **RESPONSE:** Inasmuch as administrative orders do not have precedential value
7 and are decided on a case-by-case basis, the Commissioner objects to this
8 interrogatory as irrelevant and not reasonably calculated to lead to the discovery
of admissible evidence. The Commissioner also objects because Respondent
9 seeks information that is as available to Respondent as to the Commissioner on the
OIC website.

10 **REQUEST FOR PRODUCTION NO. 12:** Produce any other writings, records,
11 notes and communications in any way related to the subject matter of these
proceedings not previously produced in response to the requests above.

12 **RESPONSE:** Additional material is attached.

13
14 ANSWERS AND RESPONSES DATED this 20th day of January, 2016.

15
16 

17 MIKE KREIDLER
18 Insurance Commissioner

19
20 By and through his designee

21 

22 MARCIA G. STICKLER
23 Insurance Enforcement Specialist
24 Legal Affairs Division

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STATE OF WASHINGTON)
) ss.
COUNTY OF THURSTON)

Marcia G. Stickler, being first duly sworn, on oath deposes and says: That she is the designated representative of the Office of the Insurance Commissioner herein, has made the foregoing Answers to Interrogatories and Requests for Production, knows the contents thereof and believes same to be true and complete.

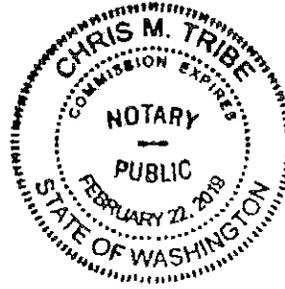
Marcia G. Stickler

SUBSCRIBED AND SWORN to before me this 20th day of January, 2016.

Chris M. Tribe
(Print Name)

NOTARY PUBLIC in and for the State of Washington

My Appointment Expires February 22, 2019



State of Washington
Office of Insurance Commissioner
Legal Affairs Division



Memorandum of Interview

Date: November 16, 2015

OIC Case #: 1229571

Person Interviewed: Ruth Hopkins

Investigator Conducting Interview: Barry M. Walden

Others Present During Interview: None

Location of Interview: Phone # 425-508-4397

Interview Audio Recorded: Yes

Declaration Prepared: Yes

On the above date, Old Republic Title Company sales manager Ruth Hopkins was interviewed by phone. She told OIC that a co-worker directed her the FATCO Facebook page which posted a free economic forecast event co-sponsored by FATCO, SCCAR, and Zillow. She said wondered why Old Republic was not invited and called SCCAR director Mathew Wahlquist. She said Wahlquist told her that it was closed private event put on by FATCO. She said that Wahlquist told her that FATCO approached them about the event, they invited who they wanted to, and SCCAR did not control who was invited. She said that FATCO used SCCAR to put on this free seminar when they should be charging an entry fee. She told OIC that she told Chris Schulz about the Facebook posting because she thought it was a violation. She said that she retired shortly after.



Office of Insurance Commissioner
Investigations Unit
Audio Recorded Statement

OIC Case #: 1229571

Statement from a person under investigation: Yes No

Statement from a witness: Yes No

Name: (Last, First): HOPKINS, RUTH SALES MAN
 Home Address: 3642 STONEWOOD City: GREENBANK
 State: WA Zip Code: 98253 Home Telephone #: _____ Cell #: 425-508-4397
 Work Telephone #: _____ Email Address: ERHOPKINS@WHIDBEY.COM
 Drivers License #: _____ State: _____

INVESTIGATOR STATEMENTS:

This is an audio recorded statement regarding OIC Case # 1229571. Today's date is Nov 16, 2015 and the time now is 1:23 PM. This is the recorded statement of RUTH HOPKINS.

I am Barry Walden of the Office of the Insurance Commissioner, Legal Affairs Division, Investigations Unit. This statement is being recorded (in person) at (location): OIC Tumwater or (over the telephone) via telephone # 360-725-7231

The following additional individuals are also present for this interview (list the names and association):
 1) _____ 3) _____
 2) _____ 4) _____

For the purposes of voice identification, would each person please state and spell your name one at a time.

AUTHORIZATION TO AUDIO RECORD STATEMENT:

Mr./Ms. HOPKINS, do you understand that this statement is being recorded? Yes No
 And do you authorize me to record your statement? Yes No
 Ask all others present if they are aware that the statement is being recorded? Yes No
 And do you authorize me to record you as well? Yes No

DECLARATION

Mr./Ms. HOPKINS, do you declare that you are over the age of eighteen and are voluntarily providing this recorded statement today freely and without threats or promises? Yes No

Do you also declare, and state under penalty of perjury, under the laws of the State of Washington, that the information you are going to provide to me today is personally known to you, is true and correct to the best of your knowledge, and, if called upon to do so, you could and would testify competently to the information you provide today?

Yes No

INTERVIEW

- State purpose of the interview
- Begin interview

END OF INTERVIEW

- Do you have anything else you would like to add to this statement? Yes No
- Is the information you provided today true and correct? Yes No

The time is now 11:47 and this concludes this statement.

Signature of Investigator:

In the complaint, it is alleged that FATCO did all the work in preparing and arranging this event and went to the local realtor's association to put their name on it so that FATCO could provide a seminar which they otherwise would be prohibited from doing in violation of RCW 48.210(2), WAC 284-29-235, and WAC 284-29-200(6), if not others.

Since WAC 284-29-235 only allows title companies to conduct educational seminars at no charge if the topic is solely regarding title insurance, title to real property, and escrow topics (which there appears to be no dispute that this seminar was not on any of these topics), then if this truly was a FATCO seminar as alleged then it would be a violation of RCW 48.29.210(2) since there is no rule that permits a title company to give this thing of value (the seminar) to a person in a position to refer or influence the referral of title insurance business.

FATCO contends that this was realtor association seminar that was open to all members (and others) of the association and hence, it was an allowable sponsorship of a trade association event. Their response does not respond to allegations that FATCO was the one that prepared the seminar, etc. and merely went to the association to put the association's name on it. The file does not indicate if they were asked to respond to this allegation. To me some of the documentation that FATCO submitted in response appears to confirm these allegations. In some of the emails that FATCO submitted to support their contention that the invitation to the seminar went to all members of the association, are emails from FATCO to the association urging the association to promote the event as the association's event, thereby potentially indicating (as alleged) that FATCO did all the preparation of the seminar and then went to the association to put their name on it so FATCO could claim that it was a permitted trade association sponsorship. Engaging in such a scheme to avoid RCW 48.29.210 and WAC 284-29-200 through WAC 284-29-265 is prohibited by WAC 284-29-200(6).

I would suggest that Ryan McIrvine at the SCCAR be contacted before any further contact with FATCO to see if he tells us the same story he told the complainant. If we contact FATCO first they may come up with a different story and/or coach Mr. McIrvine on what to say.

If the investigation does show that it was a trade association event, then there is still another aspect of the sponsorship (??) by FATCO that needs to be investigated. In the material we have received so far, FATCO says they only spent \$875 on this seminar. With over 200 attendees that would result in a cost of just over \$4 per attendee. I think it would be very difficult to find a venue, provide a speaker, lunch, and other materials for just \$4 per person. Also, if as alleged that FATCO did all the work in preparing this seminar (which would include at least finding a speaker, facility, meals, etc.) then their employee time and expenses need to be included in the amount FATCO paid/incurred in sponsoring the seminar. With only \$125 left between the \$875 they say they spent and the limit of \$1000 allowed for sponsorship of a trade association event, it would take very little time expended by a FATCO employee(s) in preparing this event to exceed the \$1000 limit in violation of WAC 284-29-220. Also, FATCO contends they only paid \$875 for the sponsorship, if so let's get their records and make sure they include all expenses.

Jim T.

RECEIVED

DEC 08 2015

OIC - INVESTIGATIONS

In Re the Matter of:

FIRST AMERICAN TITLE
INSURANCE COMPANY

OIC Case #: 1229571

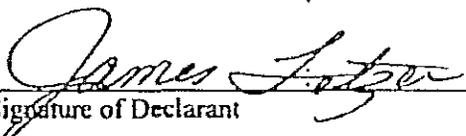
DECLARATION OF WITNESS
JIM FETZER

I, JIM FETZER, am over the age of eighteen and do voluntarily provide this declaration freely and without threats or promises, and state under penalty of perjury under the laws of the State of Washington that the following facts are personally known to me, and, if called upon to do so, I could and would testify competently to them.

1. I am an employee of Old Republic Title Insurance Company. Old Republic is a member of the Snohomish Camano County Association of Realestate Agents (SCCAR). I am a member of SCCAR and normally receive and respond to invitations and notifications of SCCAR events.
2. I was contacted by Marcia Stickler of the OIC who asked if I remember receiving an invitation from SCCAR in regards to an economic forecast seminar sponsored by First American Title Insurance Company (FATCO), on October 16, 2014.
3. I have no recollection of receiving an invitation to attend a FATCO seminar from SCCAR. I would not normally attend such an event sponsored by a competing tile company. I have conferred with my co-worker Lois who did not receive an invitation.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF WASHINGTON
STATE THAT THE FOREGOING IS TRUE AND CORRECT.

Dated this 3rd day of December, 2015.


Signature of Declarant

JAMES FETZER
Printed Name of Declarant