

BEFORE THE STATE OF WASHINGTON
OFFICE OF INSURANCE COMMISSIONER

FILED

2018 FEB -1 A 11:56

In the Matter of:

The Form A and Form E Applications for the
Proposed Acquisition of Control of:

REtitle Insurance Company,

By

A10 Capital, LLC,

Applicant.

Docket No. 17-0369

HEARINGS UNIT
OFFICE OF
INSURANCE COMMISSIONER

**ORDER DENYING PETITION FOR
RECONSIDERATION**

TO: David Bayley, President
Nancy Bayley, Vice President
REtitle Insurance Company
P.O. Box 278
Shelton, WA 98584

Richard Hoss
Hoss & Wilson-Hoss LLP
236 West Birch Street
Shelton, WA 98584

Ben Slaughter, General Counsel
Jerry Dunn, President
A10 Capital, LLC
800 West Main Street, Suite 1100
Boise, ID 83702

AND TO: Mike Kreidler, Insurance Commissioner
James T. Odiorne, J.D., CPA, Chief Deputy Insurance Commissioner
Doug Hartz, Deputy Commissioner, Company Supervision Division
Ronald Pastuch, Holding Company Manager, Company Supervision Division
Toni Hood, Deputy Commissioner, Legal Affairs Division
Dave Jorgensen, Insurance Enforcement Specialist, Legal Affairs Division
Office of the Insurance Commissioner
PO Box 40255
Olympia, WA 98504-0255

On January 26, 2018, I entered a Final Order Approving Acquisition of Control ("Final Order") in this matter.

On February 1, 2018, the OIC's Hearings Unit received and filed A10 Capital, LLC's Petition for Reconsideration ("A10's Petition") and Declaration of Ben Slaughter in Support of Petition for Reconsideration ("Declaration").

After review of A10's Petition and Declaration, I hereby deny A10's Petition.

Dated: February 1, 2018



William G. Pardee
Presiding Officer

The parties are advised that, pursuant to RCW 34.05.514 and 34.05.542, this order may be appealed to Superior Court by, within 30 days after date of service (date of mailing) of this order, 1) filing a petition in the Superior Court, at the petitioner's option, for (a) Thurston County or (b) the county of the petitioner's residence or principal place of business; and 2) delivery of a copy of the petition to the Office of the Insurance Commissioner; and 3) depositing copies of the petition upon all other parties of record and the Office of the Attorney General.

CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the state of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the state of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be filed and served the foregoing Order Denying Petition for Reconsideration on the following people at their addresses listed below:

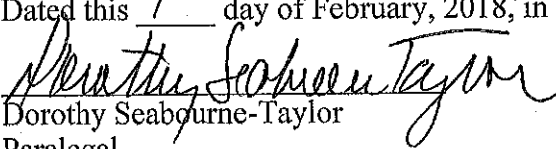
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Dated this 1st day of February, 2018, in Tumwater, Washington.


Dorothy Seabourne-Taylor
Paralegal
Hearings Unit