



**The American Land Title Association's
Title Insurance and Settlement Company Best Practices
As Performed at Star Agent Title Agency
Updated June 20, 2013**

As President & CEO of Star Agent Title Agency, I'm pleased to provide you with our company's policies and procedures in conjunction with the American Land Title Association's Best Practices.

Star Agent Title Agency was founded in 1980 and operates in the State of Ohio. Our business is local and our clients are like family – earning their trust and maintaining longstanding relationships with them is our goal.

Our company currently employs 10 full-time and 2 part-time employees. Training and Continuing Education are paramount to our mission. Star Agent Title Agency is active in the title industry's state and national land title associations.

The American Land Title Association's (ALTA's) Title Insurance and Settlement Company Best Practices are a way for Star Agent Title Agency to demonstrate its commitment to our clients, to our goal of striving to always improve upon what we do, and to earn the trust of those with whom we do business.

If you have any questions about our Policies and Procedures documents included in this manual, please feel free to contact me personally.

I look forward to our continued working relationship and want to thank you for your business.

Sincerely,

Ima Star
President & CEO

*Star Agent Title Agency
7 Best Practices Lane, Novelty, OH 44073*

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Policies and Procedures

Licensing

Purpose	To document mandated insurance licenses and corporate registrations (as applicable) so that Star Agent Title Agency is able to remain in good standing with each state(s) in which they conduct business.
Scope	These policies and procedures are for all of Star Agent Title Agency (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>Licensing</p> <p>The Company maintains active agency (business entity) licenses as well as agent (employee, owner, producer, and notary) licenses. When necessary, the Company also maintains active non-resident state licenses.</p> <p>The following people are licensed in accordance with state specific regulations:</p> <ul style="list-style-type: none"> • Persons who give rate quotes • Persons who discuss coverage and exceptions • Persons who sign commitments • Persons who sign policies <p>A tracking report (attached) is maintained by the Administrative Assistant as a monitoring control and periodically reviewed by the Office Manager to ensure the appropriate business professionals are licensed and renewed when necessary.</p> <p>Licensed individuals, along with their active licenses, have been communicated to our underwriter. The underwriter is notified when a license becomes inactive.</p> <p>Licensed individuals maintain the necessary continuing education requirements including any necessary ethics requirements. Documentation is maintained to evidence the requirements have been met.</p> <p>The Company maintains and has on file the appropriate American Land Title Association Policy Forms License.</p>

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Contact Officer	<i>Ima Star, President & CEO</i>
Date Approved	<i>April 1, 2013</i>
Date of Commencement	<i>April 1, 2013</i>
Amendment Dates	<i>N/A</i>
Date for Next Review	<i>April 1, 2014</i>
Related References and Links	<ul style="list-style-type: none"> • <i>The 'License Monitoring Tracking Report' is kept on the Star Agent Title Agency network drive in a folder entitled Licensing".</i> • <i>Completed continuing education materials for each licensee are kept on the Star Agent Title Agency network drive in a folder entitled "Licensing".</i> • <i>Active licenses (agency and agent) are kept in electronic copy on the Star Agent Title Agency network drive in folders entitled "Employee Licenses" and "Agent Licenses". Hard copies are also kept in the Administrative Assistant's file drawer in folders entitled "Employee Licenses" and "Agent Licenses".</i>

Licensing Monitoring



Date Updated: 06/01/2013

Objectives:

1. To actively monitor all agency and agent licenses to ensure they are current.
2. To actively pursue additional licenses where necessary or encourage additional employees to become licensed.
3. To provide a consistent method of communicating new and expired licenses with underwriters.

Note: Copies of actual licenses retained include but are not limited to insurance producer, closer, abstractor, and notary.

Note: Copies of actual licenses are kept electronically in the the Star Agent Title Agency main network drive in a folder entitled "Licensing".

Note: Copies of all completed continuing education materials for license renewals are kept electronically in the Star Agent Title Agency main network drive in a folder entitled "Licensing".

Name/Entity	State	License Type	License #	Expiration Date
Ima Star	OH	Agent	123456	4/1/2014
John Smith	OH	Agent	135790	6/1/2014
Jane Doe	OH	Agent	141414	11/1/2014
Star Agent Title Agency	OH	Agency	246810	4/1/2016

Ohio Reg:

The following people are licensed in accordance with state specific regulations:

- Persons who give rate quotes, see 3905.02 and 3953.01 below
- Persons who discuss coverage and exceptions, see 3905.02 and 3953.01 below
- Persons who make underwriting decisions, not specifically cited in Ohio law. Essentially, any person, who the custodian/leadership of the title agency believes has the requisite knowledge and experience to make such decisions, can make those decisions.

Persons who sign commitments ORC 3905.02 -- No person shall sell, solicit, or negotiate insurance in this state unless the person is licensed for that line of authority in accordance with this chapter. Further, ORC 3953.01 (Title Insurance Definitions) -- (H) "Title insurance agent" means a person, partnership, or corporation authorized in writing by a title insurance company to solicit insurance and collect premiums and to issue or countersign policies on its behalf. "Title insurance agent" does not include officers and salaried employees of any title insurance company authorized to do a title insurance business within this state.

No licensing requirement for escrow. Title agents in Ohio are permitted to engage in escrow per ORC.



Policies and Procedures

Escrow/Trust Accounting

Purpose	Document escrow/trust internal controls are in place to meet requirements for the safeguarding of client funds and to minimize the exposure to loss of client funds.
Scope	These policies and procedures are for all of Star Agent Title Agency (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>Escrow funds and operating accounts are separately maintained.</p> <p>The Company maintains 2 accounts: 1 Interest on Trust Account (IOTA) and 1 Escrow Account for real estate and mortgage loan transactions. Escrow/trust funds The Company maintains under a fiduciary capacity are not commingled with The Company’s operating funds or an employee or manager’s personal account.</p> <p>Escrow/Trust Accounts Trial Balance Reports.</p> <p>A trial balance report depicting the balance of a particular customer’s funds can be produced for each escrow/trust account at any time. This report depicts all individual customer file balances that do not have a zero balance. On a monthly basis, the Accounting Assistant reconciles the trial balance report to the bank balance and reconciled book balance, creating a “three way” reconciliation.</p> <p>Trial balance reports are produced for each escrow/trust account maintained by The Company, including recording accounts and underwriter premium accounts.</p> <p>Escrow/Trust Account Reconciliations</p> <p>It is the responsibility of the Accounting Assistant to reconcile the escrow/trust accounts. Account receipts and disbursements activity are reconciled daily (two-way). Monthly, a three-way reconciliation between the bank records, book records, and trial balance is performed. This reconciliation is completed within four business days of receipt of bank statement.</p> <p>A listing is kept of all escrow/trust accounts. This listing includes underwriter premiums accounts, recording accounts and dormant accounts.</p>

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Escrow/trust account reconciliations are performed by the Accounting Assistant who does not have check signing authority or the capability/authority to perform wire transfer transactions.

Each month escrow/trust account reconciliations are reviewed by Company management and evidence of the review is documented. The escrow/trust account reconciliations are available to the title insurance underwriter at any time requested.

Escrow/trust account reconciling items are clearly noted on the reconciliations. These reconciling items are followed up and addressed by the Accounting Department Manager within 4 business days of completion of the reconciliation so as to not carry over on the reconciliations from month to month.

The President & CEO reviews and signs off on all 3-way reconciliations within four business days.

Escrow/Trust Accounts are properly labeled and maintained in insured institutions.

Escrow/trust bank accounts are appropriately designated as “escrow” or “trust” accounts. This designation is noted in the original banking agreements as well as on our check stock, deposit slips, and bank statements. Unless mandated by state regulation or directed by a customer with a signed agreement, escrow/trust accounts are maintained with insured financial institutions.

Dormant file balances.

Customer files that continue to hold funds after the settlement date are reviewed periodically to determine if any disbursements have been made. The President & CEO’s approval is required for any disbursement from an inactive escrow. An inactive escrow is defined as any escrow which has had no activity for the past six months. This approval is documented and maintained.

Banking Transactions conducted by authorized employees.

Via agreements with financial institutions, The Company management authorizes employees for escrow/trust bank account transactions. Wire transfer initiation and approval levels are set by The Company and reviewed for changes in staff routinely. Former employees are immediately deleted as signatories and authorized wire transfer individuals. A list of authorized individuals is maintained in the Escrow Account Information Report (see attached example). The individual(s) designated as the ‘wire transfer administrator’ to set-up and change online banking permissions has been authorized by management.

Authorized check signers and wire individuals do not maintain the escrow/trust accounting records or perform the escrow/trust account reconciliations.

Positive pay, ACH Blocks, and international wire blocks are used.

The “Positive Pay” feature offered by our financial institutions is used on escrow/trust accounts. The Accounting Department Manager reviews the

	<p>positive pay exception report daily. All positive pay reports are maintained and any exceptions are documented and explained.</p> <p>ACH blocks and international wire blocks are placed on all escrow/trust accounts to prevent unauthorized users from withdrawing funds from the escrow/trust account.</p> <p>Background checks.</p> <p>Before an individual is hired, a background check (criminal and credit) is performed by BCheck Incorporated. Every year a background check (including criminal and credit) is performed on existing employees who have access to escrow/trust account funds.</p> <p>Escrow/trust account training.</p> <p>The Company provides escrow/trust account training as needed to individuals handling customer funds and conducting escrow/trust account reconciliations. This training is conducted by the Accounting Department Manager. All training and continuing education is tracked and maintained by the Administrative Assistant.</p>
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Amendment Dates	<i>N/A</i>
Date for Next Review	<i>April 1, 2014</i>
Related References and Links	<ul style="list-style-type: none"> • <i>Policies and procedures relating to escrow accounting and trust accounts are kept on the Star Agent Title Agency network drive in a folder entitled "Escrow Trust Accounting P&P".</i> • <i>Banking agreements and wire transfer user reports are kept on the H drive in the personal documents folder of the President/CEO of Star Agent Title Agency in a folder entitled "Bank and Wire Info".</i> • <i>Escrow Account Info is kept on the Star Agent Title Agency H drive in the personal documents folder of the Accounting Department Manager drive in a folder entitled "Escrow Account Info". This is a summary of pertinent escrow account information.</i> • <i>The link to Ohio escrow regulations is:</i> http://codes.ohio.gov/oac/3901-7-01



Policies and Procedures

Privacy and Information Security

Purpose	Document a privacy and information security program (policies and procedures) to ensure Star Agent Title Agency maintains written protocols for the protection of data and Non-public Personal Information (NPI).
Scope	These policies and procedures are for all of Star Agent Title Agency (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>The Company has a formal privacy and information security program that is appropriate with the size and complexity, the nature and scope of the Company’s activities and the sensitivity of the information in the Company’s possession. As part of this program, The Company maintains a Privacy Policy Notice (see attached) that is posted on The Company’s website and provided to customers and consumers for each order processed. Additional information about The Company’s privacy and information security program is available to consumers and customers upon request.</p> <p>The Company policies associated with the privacy and information security program are given to all employees and the employees must acknowledge in writing that they have read and understand such policies. It is the responsibility of Office Manager to ensure The Company has received all employee acknowledgements.</p> <p>The Company makes an assessment annual basis of the standards and requirements affiliated with The Company’s information security program, including those set out in this policy and procedure document. This assessment is conducted by BCheck Incorporated and a formal report on compliance is issued to The Company management.</p> <p>Physical Security of NPI</p> <p>The Company utilizes BCheck Incorporated as the information provider for background and credit checks. The Company individuals who have access to NPI is restricted to authorized principals and employees who have undergone a formal background check and credit report process which identified no irregularities.</p>

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Removable media devices, including but not limited to external hard drives, compact discs, magnetic tapes and USB/flash drives are issued by the Company with the approval of the President & CEO. The use of removable media devices is prohibited unless the President & CEO has authorized such use. Removable media is kept in a secure area and accounted for via the Office Manager when not in use.

Other standard procedures for security of NPI include closing paper files other than the one currently being worked on, stow files away when away from workspace and lock desks and file cabinets at the end of the day. Hardcopy NPI that is transmitted outside The Company is done so using only secured envelopes and/or locked document bags.

Network Security of NPI

At the direction of the President & CEO, The Company's designated Network Administrator grants appropriate access to The Company's various computer technology applications. The Company's file server(s) or main central processing unit is housed in a room with a secure door. The Company's computer network utilizes up-to-date anti-virus, anti-spyware and data encryption software applications. The Network Administrator is responsible for such software maintenance.

Access to The Company's information technology computers and network is secured by individual and unique passwords. The Company utilizes a computer application that prompts employees to change passwords in regular frequency every 90 days. All The Company's computers no mater, desktop or laptop run a "screen timeout" application causing automatic system sign off when the system detects no activity for a period of 10 minutes.

Disposal of NPI

The Company has defined and communicated to employees the types of data/information that falls into the NPI category. Any NPI data is disposed of accordingly. Paper records by shredding. Small shredders are available throughout the office. Large, secure shredding bins provided by Shred It can also be found in the office. When disposing of computers and portable storage devices, The Company uses a software application to erase/wipe clean the device.

Disaster Management Plan for NPI

The Company has a documented disaster management plan to ensure adequate back-up, recovery and business continuation procedures. The plan also includes required procedures for notification and response to security incidents and breaches. The plan is called Star IT Disaster-Recovery-Plan. The Company also maintains insurance coverage for such circumstances. The disaster management plan is reviewed on an annual basis the Office Manager and President & CEO and updated as appropriate.

Security Practices of Independent Service Providers

If independent service providers for The Company receive NPI from The Company, The Company shares this policy document with the service provider and/or conducts appropriate due diligence of the NPI security measures of the service provider before transmitting any NPI data. Service

	<p>providers are aware they must notify The Company regarding NPI security breaches of NPI data that has been transmitted.</p> <p>If security breaches occur, proper notification is provided to consumers and law enforcement in accordance with The Company's privacy and information security program and disaster management plan.</p>
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Date for Next Review	<i>April 1, 2014</i>
Related References and Links	<p><i>Internal Company Policies:</i></p> <ul style="list-style-type: none"> • <i>Policies and procedures relating to privacy and information security are kept on the Star Agent Title Agency network drive in a folder entitled "Privacy and Information Security", document name "Privacy and Information Security P&P".</i> • <i>The Company's information security program and disaster management plan are kept on the H drive in the personal documents folders of the President/CEO and the Office Manager of Star Agent Title Agency in a folders entitled "Information Security" and "Disaster Recovery".</i> • <i>The Company's "Privacy Policy Notice" document is kept on the Star Agent Title Agency network drive so that employees may access it and utilize as necessary.</i> • <i>Reference any specific privacy and information security program policies and where they are kept – Ryan need to add to this section.</i>



Privacy Policy Notice

PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about you with a nonaffiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing you with this document, which notifies you of the privacy policies and practices of Star Agent Title Agency.

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you such as on applications or other forms.
- Information about your transactions we secure from our files, or from [our affiliates or] others.
- Information we receive from a consumer reporting agency.
- Information that we receive from others involved in your transaction, such as the real estate agent or lender.

Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional nonpublic personal information will be collected about you.

We may disclose any of the above information that we collect about our customers or former customers to our affiliates or to nonaffiliated third parties as permitted by law.

We also may disclose this information about our customers or former customers to the following types of nonaffiliated companies that perform services on our behalf or with whom we have joint marketing agreements:

- Financial service providers such as companies engaged in banking, consumer finance, securities and insurance.
- Non-financial companies such as envelope stuffers and other fulfillment service providers.

WE DO NOT DISCLOSE ANY NONPUBLIC PERSONAL INFORMATION ABOUT YOU WITH ANYONE FOR ANY PURPOSE THAT IS NOT SPECIFICALLY PERMITTED BY LAW.

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.



**RECORDS AND INFORMATION MANAGEMENT
CONSENT AND ACKNOWLEDGEMENT FORM**

This will certify that I have read and understand the “Star Agent Title Agency Non-Public Personal Information Policy”. Furthermore, I also understand that Star Agent Title Agency is committed to protecting its records and fully complying with all applicable laws and regulations.

I understand that when I have a concern about a possible violation of this Policy, I have a duty to report the concern to management. I further understand that this Policy does not constitute a contract and may be modified from time to time by Star Agent Title Agency with or without notice.

Print Name of Employee/Consultant/Contractor

Signature of Employee/Consultant/Contractor

Date



Disaster Recovery Plan

Section 1. Major goals of this plan

The major goals of this plan are the following:

- To minimize interruptions to the normal operations.
- To limit the extent of disruption and damage.
- To minimize the economic impact of the interruption.
- To establish alternative means of operation in advance.
- To train personnel with emergency procedures.
- To provide for smooth and rapid restoration of service.

Section 2. Personnel – See Attached

A current list of employees with contact information is attached to this plan.

Section 3. Application profile

Use the Display Software Resources (DPSFWRSC) command to complete this table.

Application profile

Application Name	Critical? Yes/No	Fixed Asset? Yes/No	Manufacturer	Comments
RamQuest	Yes	Yes	RamQuest	1
QuickBooks	Yes	Yes	Intuit	1

Comment legend:

1. Runs daily _____.
2. Runs weekly on _____.
3. Runs monthly on _____.

Section 4. Inventory profile

A current asset list is attached to this plan.

This list should include the following:

- Processing units
- Disk units
- Models
- Workstation controllers
- Personal computers
- Spare workstations
- Telephones
- Air conditioner or heater
- System printer
- Tape and diskette units
- Controllers
- I/O processors
- General data communication
- Spare displays
- Racks
- Humidifier or dehumidifier

Inventory profile – See Attached

Manufacturer	Description	Model	Serial Number	Own or Leased	Cost
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Note:

This list should be audited every 12 months.

Miscellaneous inventory

Description	Quantity	Comments
Paper	10 Cases	
Check Stock	1000 count	
Toner	8 cartridges	

Note:

This list should include the following (if applicable):

- Tapes
- PC software (such as DOS)
- File cabinet contents or documentation
- Tape vault contents
- Diskettes
- Emulation packages
- Language software (such as COBOL and RPG)
- Printer supplies (such as paper and forms)

Section 5. Information services backup procedures

- iSeries Server
 - Journal receivers are not utilized; a back-up server is in place.
 - Daily, a save of changed objects in the following libraries and directories is done at 10 p.m.:
 - Shared Drives
 - H Drives
 - On Saturdays (day) at midnight (time) a complete save of the system is done.
 - Save media is stored off-site through OP2 in “the cloud” (location).
- Personal Computer
 - Files are not stored on the local PC’s. Instead, all work is done in the shared directories or H Drives and is backed up per the procedures outlined above on Saturdays (date) at midnight (time). It is then saved with the normal system save procedure.

Section 6. Disaster recovery procedures

The Star Agent Title Agency Disaster Recovery Plan addresses the following three elements:

Emergency Response Procedures

To document the appropriate emergency response to a fire, natural disaster, or any other activity in order to protect lives and limit damage.

Backup Operations Procedures

To ensure that essential data processing operational tasks can be conducted after the disruption.

Recovery Actions Procedures

To facilitate the rapid restoration of a data processing system following a disaster.

Disaster action checklist

1. Plan Initiation
 - a. Notify senior management
 - b. Contact and set up disaster recovery team
 - c. Determine degree of disaster
 - d. Implement proper application recovery plan dependent on extent of disaster (see Section 7. Recovery plan--mobile site)
 - e. Monitor progress

- f. Contact backup site and establish schedules
 - g. Contact all other necessary personnel--both user and data processing
 - h. Contact vendors--both hardware and software
 - i. Notify users of the disruption of service
2. Follow-Up Checklist
- a. List teams and tasks of each
 - b. Obtain emergency cash and set up transportation to and from backup site, if necessary
 - c. Set up living quarters, if necessary
 - d. Set up eating establishments, as required
 - e. List all personnel and their telephone numbers
 - f. Establish user participation plan
 - g. Set up the delivery and the receipt of mail
 - h. Establish emergency office supplies
 - i. Rent or purchase equipment, as needed
 - j. Determine applications to be run and in what sequence
 - k. Identify number of workstations needed
 - l. Check out any off-line equipment needs for each application
 - m. Check on forms needed for each application
 - n. Check all data being taken to backup site before leaving and leave inventory profile at home location
 - o. Set up primary vendors for assistance with problems incurred during emergency
 - p. Plan for transportation of any additional items needed at backup site
 - q. Take directions (map) to backup site
 - r. Check for additional magnetic tapes, if required
 - s. Take copies of system and operational documentation and procedural manuals.
 - t. Ensure that all personnel involved know their tasks
 - u. Notify insurance companies

Recovery start-up procedures for use after a disaster

1. Notify Disaster Recovery Services of the need to utilize service and of recovery plan selection.

Note:

Guaranteed delivery time countdown begins at the time Disaster Recovery Services is notified of recovery plan selection.

- a. Disaster notification numbers
222-222-2222 or 888-222-2222

These telephone numbers are in service from 7 am until 11 pm Monday through Friday.

2. Disaster notification number: 888-222-2222 answering services

This telephone number is in service for disaster notification after business hours, on weekends, and during holidays. Please use this number only for the notification of the actual disaster.

3. Provide Disaster Recovery Services with an equipment delivery site address (when applicable), a contact, and an alternate contact for coordinating service and telephone numbers at which contacts can be reached 24 hours a day.

4. Contact power and telephone service suppliers and schedule any necessary service connections.
5. Notify Disaster Recovery Services immediately if any related plans should change.

Section 7. Recovery plan-mobile site

Basic Protocol

1. Notify Disaster Recovery Services of the nature of the disaster and the need to select the mobile site plan.
2. Confirm in writing the substance of the telephone notification to Disaster Recovery Services within 48 hours of the telephone notification.
3. Confirm all needed backup media are available to load the backup machine.
4. Prepare a purchase order to cover the use of backup equipment.
5. Notify Disaster Recovery Services of plans for a trailer and its placement (on West side of office building). (See the Mobile site setup plan in this section.)
6. Depending on communication needs, notify telephone company of possible emergency line changes.
7. Begin setting up power and communications.
8. When the trailer arrives, plug into power and do necessary checks.
9. Plug into the communications lines and do necessary checks.
10. Begin loading system from backups (see Section 9. Restoring the Entire System).
11. Begin normal operations as soon as possible:
 - a. Daily jobs
 - b. Daily saves
 - c. Weekly saves
12. Plan a schedule to back up the system in order to restore on a home-base computer when a site is available. (Use regular system backup procedures).
13. Secure mobile site and distribute keys as required.
14. Keep a maintenance log on mobile equipment.

Mobile site setup plan & Hot-site system configuration

Due to the small size of our agency and our small monthly volume of transactions, it is cost prohibitive to establish and deploy a mobile site setup plan. If our business grows and our monthly volume increases to 250 closings per month, we will re-evaluate the need for a mobile site setup plan.

Communication disaster plan

We have a calling and email tree that has been distributed to owners and managers. In the event of a disaster, the tree is put into motion. This notifies all employees to the status of the disaster and when to return to work.

Electrical service

Electrical service is provided by Xcel Energy. The emergency contact number for power outages is 555-555-5555. The electrical mast is on the exterior of the building on the west side. We have 500 amp service.

Section 8. Recovery plan-hot site

Basic Protocol

*The disaster recovery service provides an alternate hot site. The site has a backup system for temporary use while the home site is being reestablished.

1. Notify Disaster Recovery Services of the nature of the disaster and of its desire for a hot site.
2. Request air shipment of modems to _____ for communications. (See _____ for communications for the hot site.)
3. Confirm in writing the telephone notification to _____ within 48 hours of the telephone notification.
4. Begin making necessary travel arrangements to the site for the operations team.
5. Confirm that all needed tapes are available and packed for shipment to restore on the backup system.
6. Prepare a purchase order to cover the use of the backup system.
7. Review the checklist for all necessary materials before departing to the hot site.
8. Make sure that the disaster recovery team at the disaster site has the necessary information to begin restoring the site. (See Section 12. Disaster site rebuilding).
9. Provide for travel expenses (cash advance).
10. After arriving at the hot site, contact home base to establish communications procedures.
11. Review materials brought to the hot site for completeness.
12. Begin loading the system from the save tapes.
13. Begin normal operations as soon as possible:
 - a. Daily jobs
 - b. Daily saves
 - c. Weekly saves
14. Plan the schedule to back up the hot-site system in order to restore on the home-base computer.

****Hot-site system configuration***

Due to the small size of our agency and our small monthly volume of transactions, it is cost prohibitive to establish and deploy a hot site setup plan. If our business grows and our monthly volume increases to 250 closings per month, we will re-evaluate the need for a hot site setup plan.

Section 9. Restoring the entire system

To get your system back to the way it was before the disaster, use the procedures on recovering after a complete system loss in the *Backup and Recovery*, SC41-5304-06.

Before You Begin: Find the following tapes, equipment, and information from the on-site tape vault or the off-site storage location:

- If you install from the alternate installation device, you need both your tape media and the CD-ROM media containing the Licensed Internal Code.
- All tapes from the most recent complete save operation
- The most recent tapes from saving security data (SAVSECDTA or SAVSYS)
- The most recent tapes from saving your configuration, if necessary
- All tapes containing journals and journal receivers saved since the most recent daily save operation
- All tapes from the most recent daily save operation
- PTF list (stored with the most recent complete save tapes, weekly save tapes, or both)
- Tape list from most recent complete save operation
- Tape list from most recent weekly save operation
- Tape list from daily saves
- History log from the most recent complete save operation
- History log from the most recent weekly save operation
- History log from the daily save operations
- The *Software Installation* book
- The *Backup and Recovery* book
- Telephone directory
- Modem manual
- Tool kit

Section 10. Rebuilding process

The management team must assess the damage and begin the reconstruction of a new data center.

If the original site must be restored or replaced, the following are some of the factors to consider:

- What is the projected availability of all needed computer equipment?
- Will it be more effective and efficient to upgrade the computer systems with newer equipment?
- What is the estimated time needed for repairs or construction of the data site?
- Is there an alternative site that more readily could be upgraded for computer purposes?

Once the decision to rebuild the data center has been made, go to Section 12. Disaster site rebuilding.

Section 11. Testing the disaster recovery plan

In successful contingency planning, it is important to test and evaluate the plan regularly. Data processing operations are volatile in nature, resulting in frequent changes to equipment, programs, and documentation. These actions make it critical to consider the plan as a changing document. These checklists are used to decide what areas should be tested.

Table 3. Conducting a recovery test

Item	Not			Comments
	Yes	No	Applicable	
Select the purpose of the test. What aspects of the plan are being evaluated?				

Describe the objectives of the test. How will you measure successful achievement of the objectives?

Meet with management and explain the test and objectives. Gain their agreement and support.

Have management announce the test and the expected completion time.

Collect test results at the end of the test period.

Evaluate results. Was recovery successful? Why or why not?

Determine the implications of the test results. Does successful recovery in a simple case imply successful recovery for all critical jobs in the tolerable outage period?

Make recommendations for changes. Call for responses by a given date.

Notify other areas of results. Include users and auditors.

Change the disaster recovery plan manual as necessary.

Table 4. Areas to be tested

Item	Yes	No	Applicable	Not Applicable	Comments
Recovery of individual application systems by using files and documentation stored off-site.					
Reloading of system tapes and performing an IPL by using files and documentation stored off-site.					
Ability to process on a different computer.					
Ability of management to determine priority of systems with limited processing.					
Ability to recover and process successfully without key people.					
Ability of the plan to clarify areas of responsibility and the chain of command.					
Effectiveness of security measures and security bypass procedures during the recovery period.					
Ability to accomplish emergency evacuation and basic first-aid responses.					
Ability of users of real-time systems to cope with a temporary loss of on-line information.					
Ability of users to continue day-to-day					

operations without applications or jobs that are considered noncritical.

Ability to contact the key people or their designated alternates quickly.

Ability of data entry personnel to provide the input to critical systems by using alternate sites and different input media.

Item	Yes	No	Applicable	Not Applicable	Comments
Availability of support equipment, such as air conditioners and dehumidifiers.					
Availability of support: supplies, transportation, communication.					
Distribution of output produced at the recovery site.					
Availability of important forms and paper stock.					
Ability to adapt plan to lesser disasters.					

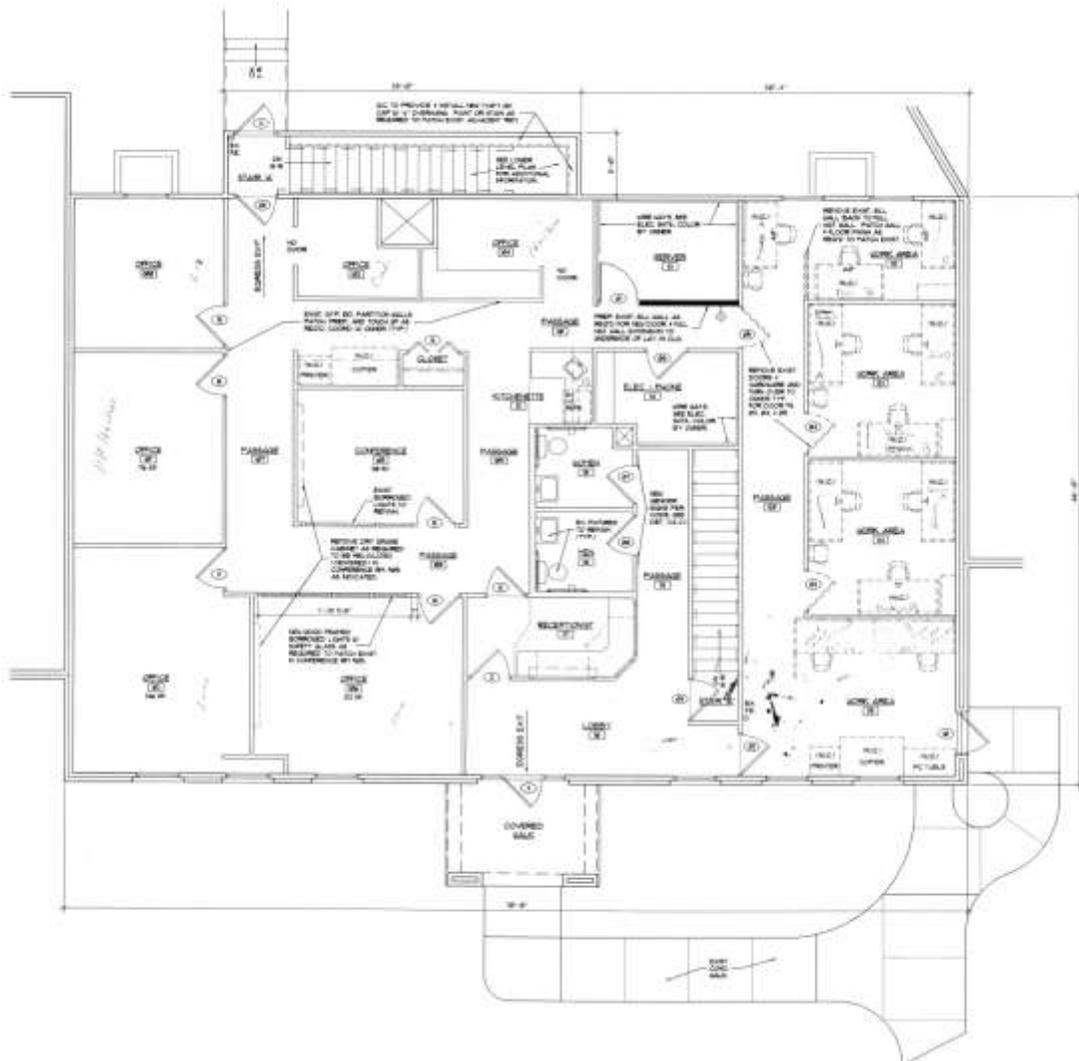
Section 12. Disaster site rebuilding

- Floor plan of data center.
- Determine current hardware needs and possible alternatives. (See Section 4. Inventory profile.)
- Data center square footage, power requirements and security requirements.
 - Square footage 350
 - Power requirements 110 and 220 volt circuits
 - Security requirements: locked area, preferably with combination lock on one door.
 - Floor-to-ceiling studding
 - Detectors for high temperature, water, smoke, fire and motion
 - Raised floor

Vendors

Floor plan

Include a copy of the proposed floor plan here.



Section 13. Record of plan changes

We keep our plan current and keep records of changes to our configuration, our applications, and our backup schedules and procedures.



Star Agent Title Agency Employee Contact List

<u>Employee Name</u>	<u>Employee Address</u>	<u>Employee Phone</u>	<u>Employee Personal Email</u>
Ima Star	1221 Oakwood Lane, Pepper Pike, OH 44124	216-666-6666	imastar@mail.com
John Smith	1234 Bluebird Lane, Novelty, OH 44073	440-222-2323	smithjd@google.com
Jane Doe	5241 Anonymous Lane, Novelty, OH 44073	440-251-2241	doejane@mail.com
Larry Saber	1234 Mayfield Drive, Mayfield Heights, OH 44124	440-555-5555	saberl@aol.com
Betsy Bean	12345 Rural Route 2, Novelty, OH 44073	440-123-4521	bbean@mail.com
Mae I. Turnkey	24 Close Easy Drive, Pepper Pike, OH 44124	216-623-1234	maeturnkey@google.com
Julie DuRight	1 Fort Knox Lane, Pepper Pike, OH 44124	216-111-2424	julieduright@mail.com
Benjamin Button	49 1/2 Timeless Drive, Mayfield Heights, OH 44124	440-000-4949	bbutton@time.com
James Bond	007 Skyfall Drive, Novelty, OH 44073	440-007-0707	bondjames@google.com
Nicole Cuillere	5050 Ballerina Court, Pepper Pike, OH 44124	440-440-3939	coleycuillere@aol.com
Ryan Marsh	2 Laketrail Drive, Mayfield Heights, OH 44124	440-662-2626	rmarsh@mail.com
Jeffrey Porsche	964 Fast Car Lane, Novelty, OH 44073	440-911-1111	porschej@aol.com



Completed 3/19/13 - All Inventory is Company-Owned

<i>Item Name</i>	<i>Serial Number</i>	<i>Inventory #</i>	<i>Cost</i>	<i>Year Aquired</i>
HP Laser Jet 4000	NUSEF036752	505	\$ 800	2010
Cisco IP Phone System	CTG123489LM	506	\$ 5,000	2010
Dell Desktop	CT420817	507	\$ 750	2010
Laser Jet 4000 tn Printer	USNC104424	510	\$ 800	2010
KDS Monitor	1984BAA17001619	512	\$ 200	2010
KDS Monitor	1282060727	513	\$ 200	2010
Canon Dr 3020 Scanner	AA31894	514	\$ 1,700	2010
Dell Desktop	5DLS012	517	\$ 750	2011
Dell Monitor	2C5ACRO	518	\$ 200	2011
Dell Desktop	5DMR921	519	\$ 750	2011
Dell Monitor	476062C5	520	\$ 200	2011
Samsung Monitor	6H17HUE1510376P	522	\$ 250	2011
Computer Line Hub	RA1022616401	523	\$ 20	2011
Dell Desktop	DR25876	526	\$ 750	2011
Dell Desktop	ES275891	527	\$ 750	2011
Dell Desktop	FT419801	528	\$ 750	2011
Dell Flat Screen Monitor	523462D4	529	\$ 200	2011
Dell Flat Screen Monitor	91602119	530	\$ 200	2011
Canon IR 2200 Scanner/Printer	42465	531	\$ 1,000	2011
Watchguard Firebox 6TC	wf2178g	532	\$ 200	2011
dell monitor	e171fpd	534	\$ 200	2011
dell monitor	f2341fdf	535	\$ 200	2011
Viewsonic Monitor VG730M	QBW064500129	537	\$ 225	2011
Viewsonic Monitor VA503B	Q78064042874	538	\$ 225	2011
Dell Monitor	4D5LMP	539	\$ 200	2012
Dell Desktop	6LF1011	540	\$ 800	2012
HP Laserjet 4000	USNC165231	541	\$ 1,000	2012
Samsung 17" flat screen monitor (Scar	GH17HVET510379N	542	\$ 250	2012
Watchguard Firebox 6TC	606234970-B9E2	543	\$ 200	2012
Dell Desktop	LX46872	544	\$ 800	2012
Dell Desktop	DZ24873	545	\$ 800	2012
Dell Desktop	GR27471	546	\$ 800	2012
Dell Desktop	KM84564	547	\$ 800	2012
Linksys Network Router	LNR1234578	548	\$ 150	2012
Dell flat screen monitor	1W-09J36747605371A24\	549	\$ 200	2012
NEC1712 Monitor	31100847GA	550	\$ 200	2012
NEC1712 Monitor	32160591GA	551	\$ 200	2012
NEC1712 Monitor	32161177GA	552	\$ 200	2012
NEC1712 Monitor	32161552GA	553	\$ 200	2012
Dell 17" LCD	CN056642-7168-SSN-AFP\	554	\$ 200	2012
Dell PowerEdge (Server)	H2ULMD3	555	\$ 1,000	2012
Dell PowerEdge (Server)	H1VDYC1	556	\$ 1,000	2012



Policies and Procedures

Document Recordation / Title & Settlement Pricing

Purpose	Document recordation and rate/pricing procedures and policies to assist Star Agent Title Agency in compliance with applicable contractual obligations and Federal and State Consumer Financial Laws.
Scope	These policies and procedures are for all of Star Agent Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>Pricing Procedures</p> <p>The Company utilizes rate manuals and online calculators, as appropriate to ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.</p> <p>Employees are aware of contractual and statutory rate and pricing requirements. Title insurance policy premiums, state specific fees and endorsements are calculated in accordance with the title insurance underwriter or regulatory or promulgated rate manual through The Company's software and/or through the use of title insurance underwriter rate calculators. All applicable rate discounts, such as Simultaneous Issue, Reissue, Refinance, and Substitution rates are calculated in accordance with the requirements in the rate manual.</p> <p>When rate change bulletins are received, the Office Manager will communicate these rate changes to the appropriate parties and will test the accuracy of such changes and report the results to Company Management.</p> <p>Throughout the year a representative sample of closed files is subject to a post-closing review by the Accounting Department Manager to conclude if fees were correctly charged.</p> <p>Recording Procedures</p> <p>Submit or ship documents for recording to the county recorder (or equivalent) or the person or entity responsible for recording within 2 business days of settlement.</p> <p>After review of county specific recording requirements documents are</p>

Star Agent Title Agency
 7 Best Practices Lane, Novelty, OH 44073

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	<p>submitted for recordation by the Closer or Closing Department Assistant. When available and economically feasible, document recordation will be processed electronically via E-recording. When E-recordings cannot be utilized or are not available and when The Company does not utilize an employee, documents will be shipped for recording. The Company ships documents using Ship Fast Shipping Co, tracks all packages and maintains tracking information for 6 months.</p> <p>Timely responses to recording rejections and verify recording is filed of record.</p> <p>The Company maintains a Recording Log to monitor all recordings. After documents are sent for recordation, The Company maintains contact with the appropriate personnel and parties to resolve any problems. The Company updates the Recording Log with information about outstanding recordings and rejected recordings, status and resolution. After documents are recorded, detailed information such as book, page, instrument number, time and date are included in the transaction file. Each week the Closing Department Assistant reviews and signs off on the Recording Log.</p>
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Contact Officer	<i>Ima Star, President & CEO</i>
Date Approved	<i>April 1, 2013</i>
Date of Commencement	<i>April 1, 2013</i>
Amendment Dates	<i>N/A</i>
Date for Next Review	<i>April 1, 2014</i>
Related References and Links	<ul style="list-style-type: none"> • <i>The Recording Log is kept on the Closing Department network drive in a folder labeled "Closing Department", in the "Recording" Sub Folder.</i> • <i>Rate Manuals are kept on the Star Agent Title Agency network drive in a folder entitled "Current Rate Information".</i> • <i>Post-Closing Reviews are kept on the "Accounting Department" network drive in a folder entitled "Post Closing Reviews".</i>



Policies and Procedures

Title Policy Production/Premium Remittance

Purpose	Maintain written procedures related to title policy production, delivery, reporting and premium remittance to the insurer to ensure Star Agent Title Agency meets its legal and contractual obligations.
Scope	These policies and procedures are for all of Star Agent Title Agency (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>Policy Inventory</p> <p>The Company receives its policy inventory directly from the insurer via the electronic policy application. A Policy Inventory Report is available in the application to track and monitor all of the electronic policy numbers allocated to The Company.</p> <p>The following items are included in the Policy Inventory report:</p> <ul style="list-style-type: none"> • The electronic policies are received by The Company • The file number associated with each policy number • Unused policies • Voided policies • Policy numbers assigned, but not yet reported to the insurer • Policy issued, but not yet reported to the insurer <p>In addition to the Policy Inventory report, The Company has a tracking system that identifies files that have closed for which policies have not been issued.</p> <p>Electronic policy stock is limited to authorized users with login and passwords.</p> <p>Policy inventory duties have been clearly defined and are the responsibility of the Office Manager. We are able to reconcile our policy inventory records with the Insurer’s records.</p> <p>Policy Issuance</p> <p>Policies are issued to customers (lender and/or purchaser) within 30 days after the transaction is disbursed. Electronic (or manual) logs (attached) are maintained within the software system to monitor all orders that have closed</p>

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	<p>and disbursed in which final policies have not been issued.</p> <p>If The Company does not perform the settlement/closing, the order is tracked and monitored by the Escrow Officer to ensure the documents are received 30 days after disbursement.</p> <p>If a short-form lender's policy is issued, it can be delivered immediately after disbursement; however, monitoring procedures are still in place to ensure the necessary documents are recorded.</p> <p>Premium Remittance and Policy Reporting</p> <p>In accordance with contractual or statutory obligations on a monthly basis, The Company reports to the insurer all title insurance policies (including endorsements), premiums and other fees as contractually obligated. Reporting is performed using the attached policy register report that has been approved by the insurer or via electronic upload through the insurer's electronic reporting web-based system. Physical copies of the policies are emailed (or mailed) to the insurer.</p> <p>A policy register report is maintained by each office that performs policy production.</p> <p>Premium remittance duties have been clearly defined and are the responsibility of the Office Manager. We are able to reconcile the premiums and fees we charged to our customers with the premiums and fees remitted to the insurer.</p>
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Contact Officer	<i>Ima Star, President & CEO</i>
Date Approved	<i>April 1, 2013</i>
Date of Commencement	<i>April 1, 2013</i>
Amendment Dates	<i>N/A</i>
Date for Next Review	<i>April 1, 2014</i>
Related References and Links	<ul style="list-style-type: none"> • <i>The Policy Inventory Register report is in our underwriter's electronic policy application.</i> • <i>The Policy Tracking report is in our title production software application.</i>



Policies and Procedures

Professional Liability Insurance

Purpose	Document procedures for review of professional liability coverage (errors and omissions insurance, fidelity and surety bond) and so that Star Agent Title Agency has financial capacity to cover its professional services obligations.
Scope	These policies and procedures are for all of Star Agent Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>The Company is required, in accordance with Ohio Law, to carry and maintain errors and omissions as well as surety bond for transactions that do not have title insurance. The Administrative Assistant is responsible for tracking and the President & CEO is responsible for renewing all insurance coverages. The Company furnishes copies of all the insurance policies and applicable bonds to their title underwriter(s), including all endorsements, and proof of payment of the current premium.</p> <p>Professional Liability Insurance Coverage - Errors and Omissions</p> <p>The Company carries professional liability insurance for errors and omissions in accordance with The Company's contractual obligations in the amount of \$1,000,000 per occurrence with a \$1,000,000 aggregate limit issued by Acorn, a company acceptable to our title insurance underwriter. This comprehensive liability policy has a deductible of no more than \$5,000 per loss. A copy of most current policy is attached.</p> <p>Fidelity Bond Coverage</p> <p>Fidelity coverage is not required by state law or contractual obligation.</p> <p>When requested by the customer or required by state regulation, the Company will issue an insurer's Closing Protection Letter (CPL) in connection with the settlement funds and issuance of a title insurance policy. This CPL will be issued via the insurer's automated Closing Protection Letter system. When required by state regulation the Company will set aside funds in a statutory indemnity fund to cover fidelity losses not otherwise covered by the protections afforded by the insurer.</p>

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	<p>Surety Bond Coverage</p> <p>Surety bond coverage is required by Ohio law for escrows in real property transactions not involving the issuance of title insurance. The Company carries surety coverage of \$150,000 issued by H Fire Insurance Company. A copy of the most current bond is attached.</p>
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Contact Officer	<i>Ima Star, President & CEO</i>
Date Approved	<i>April 1, 2013</i>
Date of Commencement	<i>April 1, 2013</i>
Amendment Dates	<i>N/A</i>
Date for Next Review	<i>April 1, 2014</i>
Related References and Links	<ul style="list-style-type: none"> • <i>Insurance information is kept on the Star Agent Title Agency network drive in a folder entitled "Insurance".</i> • <i>Policy copies are attached.</i>



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
6/22/2011

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER	CONTACT NAME:		
	PHONE (A/C, No. Ext):	FAX (A/C, No):	
INSURED	E-MAIL:		
	ADDRESS:		
	PRODUCER CUSTOMER ID #:		
	INSURER(S) AFFORDING COVERAGE		NAIC #
	INSURER A: _____ Insurance Company		
	INSURER B: _____		
INSURER C: _____			
INSURER D: _____			
INSURER E: _____			
INSURER F: _____			

COVERAGES CERTIFICATE NUMBER: 2011 REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDITIONAL SUBR INSR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY		2704	7/1/2011	7/1/2012	EACH OCCURRENCE \$ 1,000,000
	<input type="checkbox"/> COMMERCIAL GENERAL LIABILITY					DAMAGE TO RENTED PREMISES (Per occurrence) \$
	<input checked="" type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR					MED EXP (Any one person) \$
	<input checked="" type="checkbox"/> Errors & Omissions					PERSONAL & ADV INJURY \$
GENL AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE \$ 1,000,000
<input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC						PRODUCTS - COM/OP AGG \$
	AUTOMOBILE LIABILITY					COMBINED SINGLE LIMIT (Per accident) \$
	<input type="checkbox"/> ANY AUTO					BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS					BODILY INJURY (Per accident) \$
	<input type="checkbox"/> SCHEDULED AUTOS					PROPERTY DAMAGE (Per accident) \$
	<input type="checkbox"/> HIRED AUTOS					\$
	<input type="checkbox"/> NON-OWNED AUTOS					\$
	UMBRELLA LIAB	<input type="checkbox"/> OCCUR				EACH OCCURRENCE \$
	EXCESS LIAB	<input type="checkbox"/> CLAIMS-MADE				AGGREGATE \$
	<input type="checkbox"/> DEDUCTIBLE					\$
	<input type="checkbox"/> RETENTION \$					\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	<input type="checkbox"/> Y/N	N/A			WC STATUTORY LIMITS OTHER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)	<input type="checkbox"/>				E.L. EACH ACCIDENT \$
	If yes, describe under DESCRIPTION OF OPERATIONS below					E.L. DISEASE - EA EMPLOYEE \$
						E.L. DISEASE - POLICY LIMIT \$

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES - (Attach ACORD 101, Additional Remarks Schedule, if more space is required)
The insurance afforded by this policy applies solely to wrongful acts in the insured's performance of professional services for others for a fee as Title Agent, Abstractor/Searcher and Escrow/Closing Agent.

CERTIFICATE HOLDER

CANCELLATION

Evidence of Insurance Coverage

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Jon *Jon*

**Miscellaneous Professional
Liability Policy
Declarations**

THIS IS A CLAIMS MADE AND REPORTED POLICY. EXCEPT AS OTHERWISE PROVIDED HEREIN, THIS POLICY COVERS ONLY CLAIMS FIRST MADE AGAINST THE INSUREDS AND REPORTED TO THE COMPANY DURING THE POLICY PERIOD. PLEASE READ THIS POLICY CAREFULLY.

THE LIMITS OF LIABILITY AVAILABLE TO PAY INSURED DAMAGES SHALL BE REDUCED BY AMOUNTS INCURRED FOR CLAIMS EXPENSES. FURTHER NOTE THAT AMOUNTS INCURRED FOR DAMAGES AND CLAIMS EXPENSES SHALL ALSO BE APPLIED AGAINST THE RETENTION AMOUNT. TERMS THAT APPEAR IN BOLD FACE TYPE HAVE SPECIAL MEANING. PLEASE REFER TO SECTION II, DEFINITIONS.

Policy #	CPL 265	Renewal of: NEW
Item 1.	Named Insured Principal Address:	
Item 2.	Policy Period	01-Feb-2013 to 01-Feb-2014 From 12:01 a.m. to 12:01 a.m. (Local time at the address shown in item 1)
Item 3.	Limit of Liability	\$1,000,000 Each claim \$1,000,000 Aggregate Limit \$5,000 Disciplinary proceedings Claims expenses Aggregate Limit (in addition to the each claim and aggregate Limit set forth above)
Item 4.	Retention	\$5,000 Each claim
Item 5.	Premium	
Item 6.	Retroactive Date (if applicable):	01-Feb-2008
Item 7.	Professional Services:	Title Agent, Title Abstractor, Closing Agent, Escrow Agent & Notary Public

THE INSURANCE HEREBY EVIDENCED IS WRITTEN BY AN APPROVED NON-LICENSED INSURER IN THE STATE OF OHIO AND IS NOT COVERED IN CASE OF INSOLVENCY BY THE OHIO INSURANCE GUARANTY ASSOCIATION.

Item 8.

A. Notice of Claim or wrongful act:

B. All other notices:

Attention Claims Manager

Item 9.

Optional Extended Reporting Period:

See Endorsement # 2

Item 10.

Endorsements attached upon Policy effective date

01-Feb-2013

WFIC-TA-(5/12)

PF-19986 (03/06) EO

PF-25677 (11/11)

PF - 18874 (02/06)

CC-1K11g (01/11)

PF - 25513 (09/09)

PF - 33992 (12/11)

ALL - 20887 (10/06)

ALL - 21101 (11/06)

IL P 001 01 04

PI-19688c (01/11)

IN WITNESS WHEREOF, the Company has caused this Policy to be countersigned by a duly authorized representative of the Company.

02/12/2013

Date:

Authorized Representative

EFFECTIVE DATE: May 22, 2012

Bond No: _____

TITLE AGENT BOND

(PURSUANT TO SECTION 3953.23 OF THE OHIO REVISED CODE)

KNOW ALL MEN BY THESE PRESENTS, That _____
[Principal's Name]

of _____
[Principal's Street] [Principal's City]

Ohio _____ as Principal, and **H. Fire Insurance Company**
[Principal's State] [Principal's Zip Code] [Surety's Name]

_____ as Surety are held and firmly bound unto the State of
[Surety's Street] [Surety's City]

[Surety's State] [Surety's Zip Code]

Ohio as Oblige, or to any aggrieved person, who may be injured by the Principal as hereinafter provided in the penal sum of ONE HUNDRED and FIFTY THOUSAND DOLLARS (\$150,000.00) for the payment of which, well and truly to be made, we and each of us, bind ourselves, our heirs, successors, and assigns jointly and severally, firmly by these presents.

The above named Principal is licensed as an individual or business entity title insurance agent, who handles escrow, settlement, or closing functions for real estate transactions not involving the issuance of title insurance. The obligation shall be for the benefit of any aggrieved persons sustaining a loss resulting from theft, misappropriation, fraud, or any other failure to properly disburse settlement, closing, or escrow funds in a real estate transaction not involving the issuance of title insurance by the title agent or its owners, employees, or officers.

Now, therefore, the condition of the above obligation is such, that if the above bonded Principal shall indemnify any person against the loss of money or such property, to which he is entitled, which he shall sustain through any fraudulent or dishonest act or acts committed by the Principal or its employees or officers as an escrow, settlement, or closing agent in a transaction where there is no title insurance policy issued, then this obligation shall be void, otherwise to remain in full force and effect. Provided, however, that regardless of the number of years this bond remains in effect, in no event shall the aggregate liability of the surety to all claimants for all claims under this bond exceed the penal sum of this bond.

The Surety may be released from liability for future breaches of the condition of this bond upon giving (60) days written notice to the Principal and the Superintendent of Insurance of its desire to be released.

Signed, sealed and dated this 22nd day of May, 2012
[Day]

As Witness:

By: _____
[Witness]

By: _____

Test as Surety and its Corporate Seal

H. Fire Insurance Company
[Surety's Name]

By: _____
[Witness]

By: _____

3901-7-02 Title insurance agents maintenance of surety bond and errors and omissions coverage.

(A) Purpose

The purpose of this rule is to set forth the requirements regarding the surety bond and errors and omissions coverage to be maintained by title insurance agents or agencies under conditions specified in section [3953.23](#) of the Revised Code.

(B) Authority

This rule is promulgated pursuant to the authority vested in the superintendent under sections [3901.041](#) and [3953.23](#) of the Revised Code.

(C) Surety bond

All title insurance agents or agencies that handle escrows in real property transactions not involving the issuance of title insurance shall have a surety bond in place that protects all parties to such transactions against theft, misappropriation, fraud, or any other failure to properly disburse settlement, closing, or escrow funds.

(1) The surety bond shall be on a form approved by the superintendent and shall provide coverage in the minimum amount of one hundred fifty thousand dollars.

(2) The surety bond shall be kept in full force and effect as a condition precedent to the title agent's authority to transact escrow, settlement, or closing functions for real estate transactions not involving the issuance of title insurance and the title insurance agent shall supply the superintendent with satisfactory evidence thereof upon request.

(3)

(a) Licensed agents who are employees of title insurance companies authorized to do business in this state and direct operations of title insurance companies authorized to do business in this state are not required to maintain separate surety bond coverage.

(b) Title insurance companies authorized to do business in this state may self-insure wholly-owned subsidiary title agencies and employees of those agencies who are licensed as title insurance agents for the purpose of surety bond coverage.

(D) Errors and omissions insurance

(1) All title insurance agents or agencies shall maintain an errors and omissions insurance policy that includes but is not limited to coverage for the agent's or agency's delegation of any agent or agency function to a third party. The policy must provide a minimum coverage amount of two hundred fifty thousand dollars.

(2) It is the title agent's or agency's responsibility to ensure that all subcontractors are covered under the agent's or agency's errors and omissions insurance policy or that any subcontractor not so covered maintains an errors and omissions policy with minimum coverage of fifty thousand dollars.

(3)

(a) Licensed agents who are employees of title insurance companies authorized to do business in this state and direct operations of title insurance companies authorized to do business in this state are not required to maintain separate errors and omissions insurance coverage.

(b) Title insurance companies authorized to do business in this state may self-insure wholly-owned subsidiary title agencies and employees of those agencies who are licensed as title insurance agents for the purposes of errors and omissions insurance coverage.

(E) Details of surety bond and errors and omissions coverage to be provided at escrow account review

Details of any surety bond and errors and omissions coverage required under this rule shall be provided on a form that is prescribed for such use by the superintendent. The details of such coverage shall be provided at the time the annual escrow account review is performed pursuant to section [3953.33](#) of the Revised Code.

(F) Penalties

Failure to maintain the required errors and omissions coverage or failure to maintain a surety bond as necessary shall be grounds for suspension or revocation of a title insurance license.

(G) Severability

If any paragraph, term or provision of this rule is adjudged invalid for any reason, the judgment shall not affect, impair or invalidate any other paragraph, term or provision of this rule, but the remaining paragraphs, terms or provisions shall be and continue in full force and effect.

Effective: 11/11/2011



Policies and Procedures
Consumer Complaints

Purpose	To establish a process for receiving and addressing consumer complaints to ensure that Star Agent Title Agency addresses any instances of poor service or non-compliance.
Scope	These policies and procedures are for all of Star Agent Title Agency (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>Maintain a standard consumer complaint form that identifies information that connects the complaint to a specific transaction.</p> <p>The Company has a standard consumer complaint form (attached) and uses this to record any/all consumer complaints. As circumstances warrant, supporting documents are attached to the complaint form which provide additional information including communications, facts or specific details. Management documents approval on completed consumer complaint forms.</p> <p>Single point of contact for consumer complaints and process for routing consumer complaints to appropriate personnel</p> <p>The Office Manager is the single point of contact and the President & CEO is the back-up at The Company for consumer complaints. The nature of the complaint determines to which appropriate personnel the complaint will be forwarded, if necessary.</p> <p>Log of consumer complaints that includes whether and how the complaint was resolved.</p> <p>The Company maintains a Consumer Complaint Log (attached) with information on all consumer complaints and their status. Company Management will periodically review, date and sign-off on the Consumer Complaint Log.</p>

Contact Officer	<i>Ima Star, President & CEO</i>
Date Approved	<i>April 1, 2013</i>
Date of Commencement	<i>April 1, 2013</i>
Amendment Dates	<i>N/A</i>
Date for Next Review	<i>April 1, 2014</i>
Related References and Links	<ul style="list-style-type: none"> • <i>The Consumer Complaint Form is kept on the H drive in the personal documents folders of the Administrative Assistant and the President/CEO in a folder entitled "Consumer Complaints".</i> • <i>The Consumer Complaint Log is kept on the H drive in the personal documents folders of the Administrative Assistant and the President/CEO in a folder entitled "Consumer Complaints".</i>

Consumer Complaint Form

Please complete appropriate section(s) below, then "save as" using the following format:

"Last Name Consumer Complaint MMDDYY" and email to [email address here](#)

File Name Example: Smith Consumer Complaint 04-01-13

Date of Inquiry:

June 3, 2013

Consumer Contact Information:

Smith, Joseph P.

Property Address (Street, City, State, Zip)

2222 Lookout Road, Novelty, OH 44073

Contact Address (if different from Property Address)

Contact Phone Number

614-321-1234 (cell)

Additional Contact Phone Number

Transaction Information:

Agent File Number

1100

Policy Number

ORT123

Property Type (Residential or Commercial)

Residential

Transaction Type (Purchase, Refi, REO, etc.)

Refinance

Briefly describe the nature of the consumer's inquiry including dates of any conversations, phone calls, and names (including title and company affiliation) of those with whom consumer has spoken.

Mr. Smith contacted our office on June 3, 2013, 4 days after the closing, to advise that the closing was scheduled at 3 p.m., and he arrived promptly but had to wait for 30 minutes. He was unhappy about this and said he'd taken time off work so the delay caused him to miss more work.

Indicate whether additional information or documentation is attached under separate cover.

Advise consumer that this will be routed to Contact Name, Contact Title.

Julie DuRight, Office Manager

Name/Title of person completing form

Julie DuRight, Office Manager

Management Review Name/Title

Ima Star, President & CEO

