

**BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE  
OF THE STATE OF TENNESSEE**

**IN THE MATTER OF:**

**THE TITLE GUARANTY AND TRUST  
COMPANY OF CHATTANOOGA**

)  
)  
)  
)  
)

**TID No.: 18-074**

---

**ORDER ADOPTING EXAMINATION REPORT**

---

Pursuant to Tenn. Code Ann. §§ 56-1-401 *et seq.*, the Insurance Division of the State of Tennessee Department of Commerce and Insurance (“Division”) has examined certain affairs of The Title Guaranty and Trust Company of Chattanooga (“Company”), an insurance company domiciled in the State of Tennessee. As a result of an examination conducted as of December 31, 2016, the examiner-in-charge filed a verified, written report on the examination with the Division on April 13, 2018. A copy of that report was sent to the Company. (The Report on Examination of The Title Guaranty and Trust Company of Chattanooga is attached hereto and marked as Exhibit A.) The Division received a response regarding the report from the Company dated June 18, 2018. (The written response submitted by the Company is attached hereto and marked as Exhibit B.)

Pursuant to Tenn. Code Ann. § 56-1-411, the examination report regarding the affairs of the Company filed with the Division on April 13, 2018, is hereby **ADOPTED** as filed with the following **DIRECTIVES**:

1. The Company is **DIRECTED** to comply with Tenn. Code Ann. § 56-1-501 by complying with the National Association of Insurance Commissioners (NAIC)

annual statement instructions by answering the general interrogatory questions correctly and filing its Bylaws with the Department when amended.

2. The Company is **DIRECTED** to comply with Tenn. Code Ann. § 56-3-408 by requiring the Company's Board of Directors to approve all investment transactions.
3. The Company is **DIRECTED** to maintain its investments under a custodial agreement that complies with Tenn. Comp. R. & Regs. 0780-01-46.

The company shall comply with the Directives contained in this Order within thirty (30) days of its entry.

The adoption of this examination report shall not preclude the Department from imposing sanctions against the Company for potential violations of the Tennessee insurance law which may be revealed in the examination report, it being the intent of this Order Adopting Examination Report merely to adopt the examination report filed by the examiner-in-charge.

It is so **ORDERED**.

**ENTERED** this the 27 day of June, 2018.



---

Julie Mix McPeak, Commissioner  
Department of Commerce and Insurance  
State of Tennessee

**PREPARED FOR ENTRY:**

*Patrick Merkel by [Signature]*

Patrick Merkel, BPR # 022191  
Assistant General Counsel for Insurance  
Tennessee Department of Commerce and Insurance  
500 James Robertson Parkway  
Davy Crockett Tower, 8<sup>th</sup> Floor  
Nashville, Tennessee 37243

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Order Adopting Examination Report has been messenger mailed to: Lorrie K. Brouse, Deputy Commissioner and General Counsel, Department of Commerce and Insurance; Joy Little, Insurance Examinations Director/Chief Examiner, Department of Commerce and Insurance; and mailed first class, postage prepaid, to The Title Guaranty and Trust Company of Chattanooga, 617 Walnut Street, Chattanooga, Tennessee 37402, on this the 28<sup>th</sup> day of June 2018.

*[Signature]*  
Patrick Merkel