

No. **2026-10003**

**Official Order
of the
Texas Commissioner of Insurance**

Date: 07/02/2026

Subject Considered:

Vantage Point Title, Inc
18167 US Highway 19 N. Ste. 180
Clearwater, FL 33764-6566

Consent Order
TDI Enforcement File No. 37107

General remarks and official action taken:

This is a consent order with Vantage Point Title, Inc (Vantage Point) for failing to timely file its: annual trust fund account audit report for its fiscal year ending December 31, 2024; unencumbered asset certifications for 2023 and 2024; certifications of multiple quarterly tax reports; notice of appointed and canceled escrow officers; notice of a change in its operations; and, failing to timely designate a new email address. Vantage Point has agreed to pay an administrative penalty of \$18,000.

Waiver

Vantage Point acknowledges that the Texas Insurance Code and other applicable law provide certain rights. Vantage Point waives all of these rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

Findings of Fact

Licensure and Background

1. Vantage Point previously held a title agent license from September 23, 2009, until June 11, 2018, under license number 1877059 and firm identification number

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92225, when it was canceled after Vantage Point notified TDI of a complete ownership change. On the same day of the cancellation, TDI issued Vantage Point a new title agent license under a new license number 2305982 and new firm identification number 144178, effective June 11, 2018.

2. Under its former license and firm identification numbers, Vantage Point has disciplinary history. On August 16, 2012, the commissioner entered Official Order No. 12-0697 against Vantage Point, assessing a monetary penalty for several alleged violations.

Failure to Timely File Annual Trust Fund Account Audit Report

3. The Texas Insurance Code requires title agents to file with TDI an annual trust fund account audit report prepared by a certified public accountant ("the report").
4. The report is due before the 91st day after the end of the title agent's fiscal year.
5. Vantage Point's fiscal year ended on December 31, 2024.
6. Vantage Point failed to timely file the report by March 31, 2025.
7. TDI received Vantage Point's report on July 24, 2025, 115 days late.

Failure to Timely File Title Agent Unencumbered Asset Certification

8. Texas law requires title agents to file the Title Agent's Unencumbered Assets Certification (Form T-S1) annually with TDI between September 1 and September 30 of each year.
9. Vantage Point failed to timely file its Form T-S1 for 2023 and 2024.
10. Vantage Point late filed its 2023 Form T-S1 on January 2, 2024, 96 days late. When it late-filed the report, it erroneously made the filing under its prior license and firm identification numbers.
11. Vantage Point late filed its 2024 Form T-S1 on October 24, 2024, 25 days late, and again erroneously under its prior license and firm identification numbers.

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Failure to Timely File Certifications of Quarterly Tax Reports

12. The Texas Insurance Code requires title agents to file with TDI a Certification of Agent's Quarterly Tax Report (Form T-S5). Each Form T-S5 is due no later than 45 days from the end of each quarter.
13. Vantage Point failed to timely file its Form T-S5 for:
 - a. all quarters of 2023;
 - b. the first quarter of 2024; and
 - c. the fourth quarter of 2024.
14. Vantage Point late-filed its Form T-S5 for the:
 - a. first quarter of 2023, on May 31, 2023, 16 days late;
 - b. second quarter of 2023, on September 8, 2023, 25 days late;
 - c. third quarter of 2023, on December 8, 2023, 24 days late;
 - d. fourth quarter of 2023, on July 22, 2024, 159 days late;
 - e. first quarter of 2024, on July 22, 2024, 69 days late; and
 - f. fourth quarter of 2024, on February 24, 2025, 10 days late.
15. When Vantage Point late-filed its Forms T-S5 for 2023 and 2024, it erroneously made each of those filings under its prior license and firm identification numbers.

Failure to Timely Appoint and Cancel Escrow Officers

16. The Texas Insurance Code requires title agents to appoint an escrow officer before the escrow officer may act in that capacity for the title agent. To appoint the escrow officer, the title agent must submit an Escrow Officer Appointment Form (FINT09) to TDI with the associated fee. Title agents are also required to immediately complete and submit a FINT09 whenever an escrow officer ceases to act as an escrow officer, or the escrow officer's employment with the title agent ends and also provide a copy of the FINT09 to the canceled escrow officer.
17. Vantage Point employed Gary Dewayne Gholston, individual identification number 1311049, as an escrow officer from April 5, 2024, until his separation on November 9, 2024. Vantage Point failed to submit a FINT09 to TDI to cancel Gholston's appointment until September 30, 2025, more than 10 months late.

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18. Vantage Point employed Sanbath Koun Mov, individual identification number 1702406, as an escrow officer starting on November 20, 2024, but late submitted the FINT09 to TDI to appoint her on October 23, 2025, 11 months late. Since then, this escrow officer separated from employment, and Vantage Point timely canceled her appointment and notified TDI of that change to its operations.

Failure to Notify TDI of Changes in Operations

19. Title agents are required to give TDI written notice of a change in operations by submitting a Title Insurance Agent or Direct Operation Change Request (Form FINT129), together with a Title Insurance Licensing Biographical Information (Form FINT08) for each new officer, director, designated on-site manager, and person in control of the title agent.
20. On October 23, 2025, Vantage Point late filed a FINT129 and three FINT08 forms to notify TDI and provide biographical information for: two executive officers it employed beginning in August and November 2024; and, an onsite manager that it employed beginning in November of 2024.
21. When Vantage Point submitted this same FINT129, Vantage Point stated that one of its existing escrow officers had been serving as a "back up" onsite manager. Vantage Point sought to appoint this escrow officer as an additional onsite manager, but failed to include the FINT08 for this individual. Vantage Point ultimately filed the necessary FINT08 form for this individual on February 26, 2026.

Failure to Timely Designate New Email Address

22. Since May 23, 2021, the Texas Administrative Code has required that license holders, including title agents, designate an email address for receipt of official TDI communications, and if communications can no longer be received at that email address, the regulated person must designate a new email address within 10 business days.
23. Vantage Point's designated business email address belonged to an employee that separated from employment on April 15, 2024.
24. Vantage Point did not designate a new email address until October 23, 2025, after TDI informed Vantage Point that it was required to update its designated email address.

Mitigation

25. In an effort to settle all allegations against it and otherwise achieve compliance, Vantage Point voluntarily agrees that it shall take all efforts and remedial measures to ensure that in any future submissions to or filings sent to TDI that it identifies only its active license number or active firm identification number.

Conclusions of Law

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 2551.001, 2551.003, 2651.001, 2651.012, 2651.151–2651.157, and 2651.301; and 28 TEX. ADMIN. CODE § 9.1, which adopts the *Texas Title Insurance Basic Manual* (“Basic Manual”).
2. The commissioner has the authority to informally dispose of this matter as set forth in TEX. GOV'T CODE § 2001.056, and TEX. INS. CODE §§ 36.104 and 82.055.
3. Vantage Point has knowingly and voluntarily waived all procedural rights to which it may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intention to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, rehearing by the commissioner, and judicial review.
4. Vantage Point violated TEX. INS. CODE § 2651.151 by failing to timely submit an annual trust fund account audit report.
5. Vantage Point violated Rule S.1 of the Basic Manual, Section VI, by failing to timely submit the Form T-S1, Unencumbered Assets Certification Report for 2023 and 2024.
6. Vantage Point violated TEX. INS. CODE § 2651.011(c) and Rule S.5 of the Basic Manual, Section VI, by failing to timely file multiple Forms T-S5, the Title Agency Certification of Agent's Quarterly Tax Report.
7. Vantage Point violated TEX. INS. CODE § 2652.1511 and Administrative Rule L-2(III)(A)(2) of the Basic Manual, Section VI, by failing to file an Escrow Officer Appointment form (Form FINT09) to appoint an escrow officer before the escrow officer acted in that capacity.

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8. Vantage Point violated TEX. INS. CODE § 2652.153 and Rule L-2(III)(B)(2) of the Basic Manual, Section VI, by failing to immediately file an Escrow Officer Appointment form (Form FINT09) to cancel an escrow officer's appointment.
9. Vantage Point violated Rule L-1(V)(B)(2)(a) of the Basic Manual, Section VI, by failing to notify TDI of a change to its operations by filing a Title Insurance Agency or Direct Operation Change Request form (FINT129), to identify each new officer, director, designated on-site manager, or person in control of the title insurance agent.
10. Vantage Point violated 28 TEX. ADMIN. CODE § 1.1302(c) by failing to timely designate a new email address for receipt of official TDI communications.

Order

It is ordered that Vantage Point Title, Inc pay an administrative penalty of \$18,000 within 30 days from the date of this order. The administrative penalty must be paid as instructed in the invoice, which the department will send after entry of this order.

Signed by:

Amanda Crawford

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Amanda Crawford
Commissioner of Insurance

Recommended and reviewed by:

Leah Gillum

Leah Gillum, Deputy Commissioner
Fraud and Enforcement Division

Kaycee Crisp

Kaycee Crisp, Staff Attorney
Enforcement

Affidavit

STATE OF Florida §
§
COUNTY OF Pinellas §

Before me, the undersigned authority, personally appeared Natalie Hill,
who being by me duly sworn, deposed as follows:

"My name is Natalie Hill. I am of sound mind, capable of making
this statement, and have personal knowledge of these facts which are true and correct.

I hold the office of CEO and am the authorized representative of
Vantage Point Title, Inc. I am duly authorized by said organization to execute this
statement.

Vantage Point Title, Inc has knowingly and voluntarily entered into the foregoing consent
order and agrees with and consents to the issuance and service of the same by the
commissioner of insurance of the state of Texas."


Affiant

SWORN TO AND SUBSCRIBED before me on June 5, 2026.

(NOTARY SEAL)



DANIEL HELFRICH
Notary Public
State of Florida
Comm# HH313722
Expires 9/19/2026



Signature of Notary Public

Daniel Helfrich
Printed Name of Notary Public