

No. **2026-10113**

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

Date: 09/11/2026

Subject Considered:

Hardeman County Title Company, LLC
P.O. Box 275
Quanah, Texas 79252

Consent Order
TDI Enforcement File No. 39138

General remarks and official action taken:

This is a consent order with Hardeman County Title Company, LLC (Hardeman County Title) for failing to timely submit: its annual trust fund account audit report for its fiscal year ending December 31, 2025; seven quarterly tax report certifications; and two unencumbered assets certifications for 2024 and 2025. Hardeman County Title also did not immediately cancel the appointment of an escrow officer that had separated from employment. Hardeman County Title has agreed to cancel the escrow officer appointment within seven days after the date of this order, and to pay an administrative penalty of \$15,000.

Waiver

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

Findings of FactLicensure and Background

1. Hardeman County Title, firm identification number 176367, holds a title agency license issued by TDI on January 8, 2021.
2. Hardeman County Title has been previously disciplined for making a late filing, specifically it was assessed an administrative penalty of \$3,500 in Official Order No. 2023-8293, entered October 19, 2023, for late filing its annual trust fund account audit report for its 2022 fiscal year.

Late Filing of Annual Escrow Account Audit Report

3. Title agents are required to file with TDI an annual escrow account audit report of its trust fund accounts prepared by a certified public accountant (the report) not later than the 90th day after the date of the end of the title agent's fiscal year.
4. Hardeman County Title's fiscal year ended on December 31, 2025.
5. Hardeman County Title failed to timely file the report by March 31, 2026.
6. On May 11 and June 17, 2026, TDI notified Hardeman County Title by email that its report was overdue.
7. TDI received Hardeman County Title's report on August 6, 2026, 129 days late.

Late-Filed Certifications of Unencumbered Assets

8. Title agents are required 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. TDI received Hardeman County Title's Form T-S1 for 2024 and 2025 on October 14, 2024, and June 18, 2026, which were 16 and 262 days late, respectively.

2026-10113

Commissioner's Order

Hardeman County Title Company, LLC

Page 3 of 6

Late-Filed Quarterly Tax Reports

10. Title agents are required to file a Certification of Agent's Quarterly Tax Report (Form T-S5) quarterly with TDI. Each Form T-S5 is due no later than 45 days from the end of each quarter.
11. Hardeman County Title failed to timely file its Form T-S5 for the:
 - a. fourth quarter of 2023, by February 15, 2024;
 - b. second quarter of 2024, by August 15, 2024;
 - c. fourth quarter of 2024, by February 15, 2025;
 - d. first quarter of 2025, by May 15, 2025;
 - e. second quarter of 2025, by August 15, 2025;
 - f. third quarter of 2025, by November 15, 2025; and
 - g. fourth quarter of 2025, by February 15, 2026.
12. TDI received Hardeman County Title's Form T-S5 for these respective quarters on:
 - a. August 5, 2026, nearly two and one half years late;
 - b. October 15, 2024, 61 days late;
 - c. August 5, 2026, nearly one and one half years late;
 - d. June 17, 2026, over one year late;
 - e. June 17, 2026, 307 days late;
 - f. June 17, 2026, 215 days late; and
 - g. April 21, 2026, 66 days late.

Failing to Immediately Cancel an Escrow Officer Appointment

13. By rule, title agents are required to immediately complete and submit an Escrow Officer Appointment Form (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.
14. Hardeman County Title failed to immediately file a FINT09 form to cancel the appointment of Jami Hope Watkins, individual identification number 1310885, an escrow officer who separated from employment with Hardeman County Title in April 2024.

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, 2651.151–2651.157, 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. Hardeman County Title 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. Hardeman County Title violated TEX. INS. CODE § 2651.151 by failing to timely submit its annual trust fund account audit report for its fiscal year ending December 31, 2025.
5. Hardeman County Title violated TEX. INS. CODE § 2651.012 and Administrative Rule S.1 of the Basic Manual, Section VI, by failing to timely file its 2024 and 2025 T-S1 Forms, the Title Agent's Unencumbered Assets Certification.
6. Hardeman County Title violated TEX. INS. CODE § 2651.011(c) and Administrative Rule S.5 of the Basic Manual, Section VI, by failing to timely file multiple T-S5 Forms, the Title Agent Certification of Agent's Quarterly Tax Report.
7. Hardeman County Title violated TEX. INS. CODE § 2652.153 and Administrative 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 appointment.

Order

It is ordered that not later than seven days from the date of this order, Hardeman County Title Company, LLC must submit a FINT09 form to TDI to cancel the appointment of its former escrow officer Jami Hope Watkins.

2026-10113

Commissioner's Order

Hardeman County Title Company, LLC

Page 5 of 6

It is further ordered that Hardeman County Title Company, LLC pay an administrative penalty of \$15,000 within 30 days from the date of this order. The administrative penalty must be paid as instructed in the invoice, which TDI 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

Sarah White

Sarah White, Staff Attorney
Enforcement

Affidavit

STATE OF Texas §

§

COUNTY OF Hardeman §

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

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

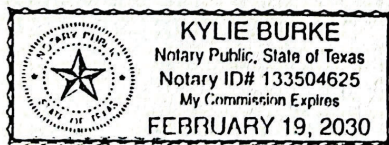
I hold the office of attorney/escrow officer and am the authorized representative of
Hardeman County Title Company, LLC. I am duly authorized by said organization to
execute this statement.

Hardeman County Title Company, LLC 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."

Maxley Elliott
Affiant

SWORN TO AND SUBSCRIBED before me on August 27, 2026.

(NOTARY SEAL)



Kylie Burke
Signature of Notary Public

Kylie Burke
Printed Name of Notary Public