

BEFORE THE DIVISION OF INSURANCE  
STATE OF COLORADO

OAC Case No.  
Division Order No. 0-06-089

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**ORDER OF SUMMARY SUSPENSION, NOTICE OF DUTY TO ANSWER, NOTICE  
TO SET AN INFORMAL PREHEARING CONFERENCE, NOTICE OF HEARING,  
AND NOTICE OF CHARGES**

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IN THE MATTER OF DOUGLAS P. FARR, INSURANCE PRODUCER,  
NEIGHBORHOOD TITLE SERVICES, LLC, CPR TITLE OF CRESTED BUTTE, LLC,  
FIDELITY TITLE, LLC, FIRST CHOICE TITLE, LLC, FREEDOM TITLE & ESCROW,  
LLC, KD TITLE & APPRAISAL, LLC, LENDERS TITLE, LLC, TOP NOTCH TITLE,  
LLC, TRI CITY TITLE, LLC, UPTOWN TITLE & ESCROW, LLC.

Respondents.

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TO:

Douglas P. Farr  
1860 Blake St., Suite 900  
Denver, CO 80202

First Choice Title, LLC  
5200 DTC Parkway, #116  
Greenwood Village, CO 80111

Neighborhood Title Services, LLC  
6350 West 92nd Avenue  
Westminster, CO 80031

Freedom Title & Escrow, LLC  
1860 Blake St., Suite 900  
Denver, CO 80202

CPR Title, Inc.  
6350 W. 92nd Ave.  
Westminster, CO 80031

Lenders Title, LLC  
7340 E. Caley Avenue  
Suite 115  
Greenwood Village, CO 80111

CPR Title of Crested Butte, LLC  
1860 Blake St., Suite 81224  
Denver, CO 80202

Top Notch Title, LLC  
1860 Blake St., Suite 900  
Denver, CO 80202

CPR Title of Crested Butte, LLC

Tri City Title, LLC

1860 Blake St., Suite 900  
Denver, CO 80202

6350 West 92nd Avenue  
Westminster, CO 80031

Fidelity Title, LLC  
1860 Blake St., Suite 900  
Denver, CO 80202

Tri City Title, LLC  
6550 West 92nd Avenue  
Westminster, CO 80031

Uptown Title & Escrow, LLC  
6350 West 92nd Avenue  
Westminster, CO 80031

### **ORDER OF SUMMARY SUSPENSION**

The Colorado Division of Insurance (the "Division"), having conducted an investigation as to the matters referenced below, HEREBY FINDS:

1. At all times relevant to the events described herein, Respondent Douglas P. Farr ("Respondent Farr") was and still is licensed in the state of Colorado as an insurance producer under §§ 10-2-101 through 10-2-1101, C.R.S., the Colorado Producer Licensing Model Act ("PLMA")
2. At all times relevant to the events described herein, Respondents Neighborhood Title Services, LLC, CPR Title, Inc., CPR Title of Crested Butte, LLC, Fidelity Title, LLC, First Choice Title, LLC, Freedom Title & Escrow, LLC, KD Title & Appraisal, LLC, Lenders Title, LLC, Top Notch Title, LLC, Tri City Title, LLC, and Uptown Title & Escrow, LLC, ("Respondent Agencies") were, and still are, licensed in the state of Colorado as resident insurance producer agencies under §§ 10-2-101 through 10-2-1101, C.R.S., the Colorado Producer Licensing Model Act ("PLMA").
3. The Division has jurisdiction over the Respondents and the subject matter described herein.
4. Reasonable grounds exist to believe, and the Division so finds, that Respondents Farr and Neighborhood Title have deliberately and willfully violated Colorado insurance laws and regulations. The grounds therefore are more fully described in the Notice of Charges set forth below, which is incorporated herein by reference.
5. Respondent Farr is the responsible producer for all Respondent Agencies. Those agencies cannot continue to operate without a licensed responsible producer. As such,

the Division finds that it must, by operation of law, suspend the licenses of all Respondent Agencies named herein.

6. Based on the information contained in the Notice of Charges set forth below, reasonable grounds exist to believe, and the Division so finds, that the public safety and welfare imperatively require that emergency action be taken.

THEREFORE, IT IS HEREBY ORDERED that under §§ 24-4-104(4) and 24-4-105(12), C.R.S., the insurance producer licenses of all Respondents be and hereby are **SUMMARILY SUSPENDED** from the date of this order pending proceedings to determine whether Respondents' insurance producer licenses should be further disciplined in accordance with §§ 10-2-801 and 10-2-804, C.R.S.

Pending the outcome of such proceedings, IT IS FURTHER ORDERED that Respondents immediately cease, desist, and refrain from the date of this order from any further acts for which a license to act as an insurance producer or agency producer is required by the laws of the state of Colorado, and that all insurance producer license certificates issued to them by the Division be immediately delivered to the Division pending the outcome of this proceeding.

DATED this 15<sup>th</sup> day of November, 2005.

COLORADO DIVISION OF INSURANCE



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ERIN TOLL  
Deputy Commissioner of Compliance  
and Market Regulation

**NOTICE TO SET AN INFORMAL PREHEARING CONFERENCE**

YOU ARE HEREBY NOTIFIED that the attorney or representative for the Colorado Division of Insurance will appear at **9:00 a.m. on December 9, 2005**, at the Office of the Chief Administrative Law Judge, Office of Administrative Courts, 633 17<sup>th</sup> Street, Suite 1300, Denver, Colorado, 80202, in order to set the date, time, and location for an informal prehearing conference with an administrative law judge. At the informal prehearing conference, the date, time and location will be set for a hearing on the Notice of Charges set forth below, an expedited discovery schedule will be arranged, and dates will be set for filing motions and for any prehearing conference as may be necessary. You may be present at such informal prehearing conference in person, by counsel, or by telephone by calling the Office of Administrative Courts at (303) 866-2000 at the time and date indicated above.

**NOTICE OF HEARING**

YOU ARE HEREBY NOTIFIED that under §§ 10-2-801, 10-2-804, 24-4-104 and 24-4-105, C.R.S., a hearing will be held before an authorized administrative law judge at a date, time, and location to be determined pursuant to the preceding Notice to Set. Such hearing will be conducted for the purpose of determining whether the Colorado insurance producer licenses of Douglas P. Farr, Neighborhood Title Services, LLC, CPR Title, Inc., CPR Title of Crested Butte, LLC, Fidelity Title, LLC, First Choice Title, LLC, Freedom Title & Escrow, LLC, KD Title & Appraisal, LLC, Lenders Title, LLC, Top Notch Title, LLC, Tri City Title, LLC, and Uptown Title & Escrow, LLC, should be revoked, suspended, or subjected to other lawful discipline under § 10-2-801, C.R.S., and whether civil penalties should be imposed against them under § 10-2-804(4), C.R.S. for violations of §§ 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e), (h), and (i), and 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-1-8, 1-2-1 and 3-5-1, as more fully described in the Notice of Charges below.

YOU ARE FURTHER HEREBY NOTIFIED that the relevant parts of the above-cited provisions of the Colorado Revised Statutes and the Division of Insurance regulations alleged to have been violated by Respondents are more fully set forth below:

§ 10-2-404. **Application for license.**

...

(2) An insurance agency or business entity acting as an insurance producer shall obtain an insurance producer license. Application shall be made on a form specified by the commissioner. Before approving the application, the commissioner shall verify that:

...

(d) The insurance agency or business entity has designated a licensed producer who is an officer, partner, or director responsible for the insurance agency's or business entity's compliance with the insurance laws and rules of this state.

...

**§ 10-2-704. Fiduciary Responsibilities.**

(1)(a) All premiums belonging to insurers and all unearned premiums belonging to insureds received by an insurance producer licensee under this article shall be treated by such insurance producer in a fiduciary capacity. The commissioner may promulgate such rules as are necessary and proper relating to the treatment of such premiums.

(b) All premiums received, less commissions if authorized, shall be remitted to the insurer or its agent entitled thereto on or before the contractual due date or, if there is no contractual due date, within forty-five days after receipt.

...

(3) No insurance producer under this article shall commingle premiums belonging to insurers and returned premiums belonging to insureds with the producer's personal funds or with any other funds except those directly connected with the producer's insurance business.

**§ 10-2-801. Licenses--denial, suspension, revocation, termination.**

(1) The commissioner may suspend, revoke, refuse to continue or renew, or refuse to issue an insurance producer license if, after notice to the insurance producer licensee and after hearing in accordance with sections 24-4-104 and 24-4-105, C.R.S., the commissioner finds that as to the licensee or applicant any one or more of the following conditions exist:

...

(c) Violation of, or noncompliance with, any insurance law, or violation of any lawful rule or order of the commissioner or of the insurance department of another state;

...

(e) Improperly withholding, misappropriating, or converting to the licensee's or applicant's own use any moneys belonging to policyholders, insurers, beneficiaries, or others received in the course of the business of insurance;

...

(h) Commission of any unfair trade practice or fraud;

(i) The use of fraudulent, coercive, or dishonest practices or demonstrating incompetence, untrustworthiness, or financial irresponsibility in this state or elsewhere;

...

**§ 10-2-804. Investigation by commissioner.**

...

(3) The license of an insurance agency or business entity may be suspended or revoked or the renewal or continuation refused if the commissioner finds, after hearing, that an individual licensee's violation was known or should have been known to one or more of the partners, officers or managers acting on behalf of the insurance agency or business entity, including any foreign or domestic entity as defined in section 7-90-102, C.R.S., and that such violation was not reported to the division of insurance nor corrective action taken in relation thereto.

(4) In addition to or in lieu of any applicable denial, suspension, or revocation of an insurance producer license, any person who violates any provision of this article may, after hearing, be subject to a civil penalty of not more than one thousand dollars for each such violation.

**§ 10-11-108. Prohibitions.**

(1) A title company or title insurance agent shall not:

(c) Give or receive or attempt to give or receive remuneration in any form pursuant to any agreement or understanding, oral or otherwise, for the referral of title insurance business;

(d) Give or receive or attempt to give or receive any portion or percentage of any charge made or received in connection with the business of title insurance if such charge is not for services actually rendered. For purposes of this article, "services actually rendered" shall include but not be limited to a reasonable examination of a title, including instruments or record, and a determination of insurability of such title in accordance with sound underwriting practices; "services actually rendered" shall not include the mere referral of title insurance business.

**§ 10-11-116. Title insurance agents licensed.**

(1)(a) Title insurance agents shall be licensed in a manner provided for insurance producers in part 4 of article 2 of this title, except as otherwise provided in this section.

**Regulation 1-1-8. Penalties and Timelines Concerning Division Inquiries and Document Requests.**

...

## SECTION 5 RULES

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E. Failure to provide a response, or providing an incomplete response to Division inquiries at any point in the handling of a matter, including during the course of a financial market conduct examination, subjects the person to immediate imposition of a minimum \$500 fine per act or occurrence.

## SECTION 6 Enforcement

Noncompliance with the requirements and timeframes specified in this regulation may result, after proper notice and hearing, in the imposition of any sanctions made available in Colorado statutes pertaining to the business of insurance or other laws which include the imposition of fines, issuance of cease and desist orders, and/or suspension or revocation of license.

### Regulation 1-2-1. **Concerning Agent Fiduciary Responsibilities.**

...

#### III. Rule:

...

B. Upon receipt, the insurance producer must treat all premiums in a fiduciary capacity, including but not limited to the following:

1. Upon receipt the insurance producer must treat all premiums and return premiums as trust funds and segregate them from his own funds, and

...

3. the insurance producer must not treat insurance premiums or returned premiums as a personal or business asset and

...

6. any deposit of such premium and returned premium funds into a bank or savings account must be into separate insurance trust account until actually remitted to the insurer or person entitled thereto. Such deposits will be subject to the uniform fiduciary's law as delineated in § 15-1-101, et seq., C.R.S.

### Regulation 3-5-1. **Title Insurance.**

...

#### Section 3. Definitions

A. "Affiliate" means a person who directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with a title entity.

B. "Affiliated business arrangements" mean various ownership arrangements that may exist between and among title entities and settlement producers. Affiliated business arrangements are distinct from controlled business arrangements which are defined by § 10-2-401(4), C.R.S.

...

#### Section 5. Rules Regarding Standards Of Conduct For Title Insurance Entities

In addition to any and all acts which may be proscribed elsewhere in Title 10, no title entity shall pay, furnish, or agree to pay or furnish, either directly or indirectly, or through affiliates or associates, any commission or any part of the fees or charges or remuneration in any form, in connection with any past, present, or future title insurance business, any closing and settlement services or any other title insurance business except for services actually rendered, as defined in § 10-11-108(1)(d) and (2), C.R.S., to or on behalf of any of the following:

1. Any settlement producer;
2. Any owner or prospective owner, lessee or prospective lessee of real property or any interest in the real property;
3. Any obligee or prospective obligee of any obligation secured or to be secured either in whole or in part by real property or any interest in the real property; or,
4. Any person who is acting as or who is in the business of acting as agent, representative, attorney or employee of any of the persons described in 1, 2 or 3 above, or any other party to the instant transaction.

The factors the Division will consider when determining whether remuneration for the referral of title insurance business exists or will exist, include, but are not limited to: 1) whether the costs of any settlement producer is being or will be defrayed by the title entity's actions; 2) whether the remuneration is being or will be given to a discrete settlement producer as opposed to a bona fide association of settlement producers; 3) whether a pattern or practice of referrals to the title entity exists or will exist; and 4) consideration of the advertising value of the remuneration to the title entity.

...

A. The following is a partial, but not all-inclusive, list of acts and practices which the Division considers per se unlawful inducements proscribed by § 10-11-108, C.R.S.:

1. Affiliated business arrangements which are tied to the referral of title insurance business. Section 10-11-108(1)(c), C.R.S. does not prohibit all ownership interests or affiliated business arrangements between and among title insurance entities and settlement producers. The Division will make determinations on a case-by-case basis. Prohibited arrangements include, but are not limited to the following:

...

6. Paying for, furnishing, providing, subsidizing, waiving or offering to pay, furnish, provide, subsidize or waive, to or for any of the persons described above in this Section 5 all or any portion of the following:

a. Advertising or promotional material or activity, including, but not limited to, any obligation, product, service, seminar, convention or publication for the benefit of any settlement producer, or ostensibly for the benefit of the title entity, the end result of which is the substantial subsidization of an obligation, product, service, seminar, convention or publication of any settlement producer. This prohibition applies to ads placed in subdivision or tract brochures, multiple listing services or books, exchange bulletins, newsletters, information sheets, programs, announcements and periodicals or similar matter associated with meetings, seminars or conventions of such settlement producers as well as registers and directories of such persons;

...

c. Furniture, equipment, office supplies, telephones, or automobiles, including any portion of the cost of renting, leasing, operating or maintaining the above-mentioned items, unless such title entity pays no more than its allocable share of the actual costs for such goods and services commensurate with the actual usage of such goods services, and facilities actually furnished;

d. Rent to or from any settlement producer for premises wherever situated, regardless of the purpose, at a rent which is materially in excess of or materially below market value when compared with the amount paid per square foot for comparable space in the geographic area;

...

f. Salary, compensation or services, except for services actually rendered, including, but not limited to:

i. All or any part of the time or productive effort of any employee or affiliate of the title entity (e.g., office manager, escrow officer, secretary, clerk, messenger) to any settlement producer at less than the fair market value of the services;

ii. Compensation of a settlement producer or associate of a settlement producer;

iii. The salary or any part of the salary of a relative of any settlement producer which payment is in excess of the reasonable value of the work actually performed by such relative on behalf of the title entity; and

iv. Services by any settlement producer which services are required to be performed by such settlement producer in his or her professional capacity, and for which the settlement producer would not normally charge the title entity.

...

17. Providing, or offering to provide, non-title insurance services (e.g. computerized bookkeeping, forms management, computer programming, or any similar benefit) to any settlement producer at less than the fair market value of the services.

...

19. Advancing or paying into escrow, or offering to advance or pay into escrow, any of the title entity funds or "closing short", except as provided in Section 6.

#### Section 8. Rules Regarding Fiduciary Duties

- A. All title entities and their authorized agents in possession of funds received and belonging to others shall maintain the funds in a fiduciary capacity in a separate fiduciary fund account or accounts supported by books and records sufficient to identify such funds. The fiduciary fund account(s) shall be identified as "fiduciary fund", "trust account" or "escrow account", or identified similarly. These funds include but are not limited to, title insurance premiums, earnest money deposits, loan proceeds, seller's proceeds, homeowners association dues, and closing and settlement costs.
- B. All fiduciary funds shall be maintained in an account separate from other monies and assets of the title entity. Commingling of other monies and assets of the title entity with fiduciary funds is prohibited. Notwithstanding the foregoing, nothing herein shall prohibit the advancement of funds authorized pursuant to § 38-35-125 (2), C.R.S.
- C. All fiduciary funds shall be deposited within three business days with a state or federal bank, or a savings and loan association whose depositors are insured by an instrumentality of the United States Government, unless otherwise directed in writing

by all parties to the transaction that established the need for the fiduciary funds to be deposited with the title entity.

- D. Except as otherwise consented to in writing by the parties to a transaction establishing the need for fiduciary funds, a title entity or its authorized agent shall not use such fiduciary funds for any purpose other than the purpose or purposes set forth in the written agreement for which the fiduciary funds were deposited with the title entity.

YOU ARE FURTHER HEREBY NOTIFIED that at the hearing in this matter, you will have the right to appear in person and/or by legal counsel; to present evidence on your behalf; to cross-examine any witnesses presented by the Division; and to rebut any evidence presented by the Division. You may also have subpoenas issued on your behalf upon request to the administrative law judge.

#### **NOTICE OF DUTY TO ANSWER**

YOU ARE HEREBY NOTIFIED that under § 24-4-105(2)(b), C.R.S., you are required to file a written answer to the Notice of Charges set forth below with the Office of Administrative Courts, Denver, Colorado 80203, within thirty (30) days after the mailing date of this Order of Summary Suspension, Notice of Duty to Answer, Notice to Set an Informal Prehearing Conference, Notice of Hearing, and Notice of Charges. You must also mail a copy of such answer to the Division's attorney of record in this matter, Laura A. Broniak, Assistant Attorney General, Office of the Attorney General, 1525 Sherman Street, 5th Floor, Denver, CO 80203, within the same 30-day time period.

If you fail to file your written answer within 30 days as set forth above, an order entering a default decision may be issued against your Colorado insurance producer license. Such a default decision may grant the relief requested in the Notice of Charges, or such other relief or penalties that may be provided for by law, or both.

#### **NOTICE OF CHARGES**

The Division charges and alleges as follows:

#### **GENERAL ALLEGATIONS**

1. At all times relevant to the events alleged herein, Douglas P. Farr ("Respondent Farr" or "Respondents") and Neighborhood Title Services ("Respondent Neighborhood

Title" or "Respondents"), LLC, CPR Title, Inc. ("Respondent CPR Title" or "Respondents"), CPR Title of Crested Butte, LLC ("Respondent CPR Title of CB" or "Respondents"), Fidelity Title, LLC ("Respondent Fidelity Title" or "Respondents"), First Choice Title, LLC ("Respondent First Choice" or "Respondents"), Freedom Title & Escrow, LLC ("Respondent Freedom" or "Respondents"), KD Title & Appraisal, LLC ("Respondent KD Title" or "Respondents"), Lenders Title, LLC ("Respondent Lenders Title" or "Respondents"), Top Notch Title, LLC ("Respondent Top Notch" or "Respondents"), Tri City Title, LLC ("Respondent Tri City" or "Respondents"), and Uptown Title & Escrow, LLC ("Respondent Uptown Title" or "Respondents"), were and continue to be authorized to engage in the business of insurance in the State of Colorado pursuant to §§ 10-2-101 through 10-2-1101, the Colorado Producer Licensing Model Act ("PLMA").

2. It is the duty and responsibility of the Commissioner of Insurance (the "Commissioner") to supervise the business of insurance in this State to assure that it is conducted in accordance with the laws of this state and in such a manner as to protect policyholders and the general public. § 10-1-108(8), C.R.S.
3. The Commissioner has discretion pursuant to § 10-1-126, C.R.S., to use the services of an administrative law judge appointed pursuant to part 10 of article 30 of title 24, C.R.S., to conduct a hearing according to the "State Administrative Procedure Act."
4. Respondent Farr was first issued a resident insurance producer license on January 5, 2000 and his license number is 101962. Respondent Farr's resident insurance producer license with title authority allows him to transact the business of title insurance in accordance with Colorado insurance laws, the applicable rules of the Division (the "Rules"), and other relevant laws, rules and orders.
5. Respondent Farr possesses an ownership interest, is an officer, director or partner and/or is designated as the responsible producer pursuant to § 10-2-404(2)(d), C.R.S., for the following licensed resident producer agencies:
  - (a) Neighborhood Title Services, LLC, License Number 12989
  - (b) CPR Title, Inc., License Number 139906
  - (c) CPR Title of Crested Butte, LLC, License Number 186614
  - (d) Fidelity Title, LLC, License Number 193297
  - (e) First Choice Title, LLC, License Number, 182562
  - (f) Freedom Title & Escrow, LLC, License Number 184701
  - (g) KD Title & Appraisal, LLC, License Number, 12805
  - (h) Lenders Title, LLC, License Number 151361
  - (i) Top Notch Title, LLC, License Number 183721

- (j) Tri City Title, LLC, License Number 162199
- (k) Uptown Title & Escrow, LLC, License Number 194093

6. The Commissioner has jurisdiction over Respondents and the subject matter herein.
7. Respondent Agencies and Respondent Farr contracted with Attorneys' Title Guaranty Fund, Inc. (hereinafter "Attorney's Title") to produce title insurance business, collect premiums and issue title commitments and policies.
8. During the course of a market conduct examination of the aforementioned title insurance agencies, the Division discovered that one or more of the Respondent agencies and Respondent Farr failed to remit premiums to Attorney's Title in the approximate amount of \$500,000.00 in violation of § 10-2-704(1)(b), C.R.S.
9. As a result of Respondents' failures to remit premium, approximately 6,400 title policies were not issued to consumers who paid for and thus expected to receive a title insurance policy.
10. As the responsible producer for all Respondent Agencies, Respondent Farr failed to ensure that Respondent Agencies were in compliance with Colorado insurance laws and regulations.
11. Upon information and belief, Respondent Farr and other company officers directed the Respondent Agencies' staff not to remit premium to Attorneys' Title due to lack of sufficient funds within the Respondent Agencies bank accounts.
12. Respondent Farr has not accounted for the missing premium in the amount of approximately \$500,000.00.
13. Respondent Farr failed to keep business assets separate from premiums and fiduciary funds as required by § 10-2-704(1)(a), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1.
14. Additionally, during the same market conduct examination, the Division discovered that in addition to performing its own title services, Respondent CPR Title also provided title search and examination, commitment and policy issuance, and closing services for one or more of the Respondent Agencies.
15. Respondent CPR Title also provided accounting, human resource, payroll, benefit, and IT/ITS services to one or more of the Respondent Agencies.

16. One or more of the Respondent Agencies failed to have a licensed insurance producer in its office, did not have a verifiable store front location, and contracted with CPR Title for multiple non-insurance services.
17. On or about October 4, 2005, the Division received a complaint from a real estate agent stating that Respondent Neighborhood Title performed closing, settlement and escrow services for his client, Julia McClurg, on September 28, 2005.
18. During said closing, Ms. McClurg tendered a cashier's check, number 087420, in the amount of \$220,007.54 issued by Security Title through Centennial Bank to the closing agent, George Cabajo. Mr. Cabajo is employed by Respondent First Choice.
19. Ms. McClurg's check was to be deposited into Neighborhood Title's escrow account for later disbursement to the seller or the seller's lender.
20. On or about October 4, 2005, Respondent Neighborhood Title informed the real estate agent that Ms. McClurg's cashier's check had been misplaced and that they were concerned that funds they had already disbursed on September 28, 2005, would not clear because Neighborhood Title's account would now have insufficient funds.
21. On or about September 26, 2005, Ms. Giddens closed a loan using the settlement, closing and escrow services provided by Respondent Neighborhood Title. As part of its service, Respondent Neighborhood Title was responsible for disbursing funds from its escrow account to Ms. Giddens' creditors no later than September 30, 2005.
22. On or about October 3, 2005, Ms. Giddens picked up the funds in the form of checks issued by Respondent Neighborhood Title. The funds were in the form of check number 10426 issued to Chase in the amount of \$15,204.00 and check number 10425 issued to Chase in the amount of \$27,453.51.
23. Ms. Giddens mailed the payments to her creditors on or about October 3, 2005.
24. On or about October 21, 2005, Ms. Giddens received a notice from Chase Auto Finance informing her that the check issued by Respondent Neighborhood Title in the amount of \$27,453.51 was returned unpaid due to insufficient funds.
25. On or about October 26, 2005, Ms. Giddens received a notice from Chase Cardmember Services informing her that the check issued by Respondent Neighborhood Title in the amount of \$15,204.00 was returned unpaid due to insufficient funds. Chase further advised that it twice presented the check for payment.

26. On or about November 3, 2005, the Division mailed to Respondent Neighborhood Title a letter notifying it of Ms. Giddens' complaint and requesting that it provide an explanation, written data, arguments or views concerning the allegations.
27. On or about November 14, 2005, the Division received a letter from Respondent wherein it failed to sufficiently explain the allegations and provided an otherwise incomplete answer to the Division's questions. It also failed to furnish bank statements as requested by the Division.

### **COUNT I**

**Douglas P. Farr**

**(Concerning violations of §§ 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e), (h) and (i), and 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-1-8, 1-2-1 and 3-5-1)**

28. The Division realleges paragraphs 1 through 27 above as though fully set forth herein.
29. As the responsible producer for all Respondent Agencies, Respondent Farr was responsible for compliance with the insurance laws and rules of this state pursuant to § 10-2-404(2)(d), C.R.S.
30. Respondent Farr failed to properly oversee or manage Respondent Agencies' escrow accounts, operating accounts and general business operations.
31. Due to Respondent Farr's failure to oversee the agencies for which he was responsible, Respondent Neighborhood Title issued insufficient funds checks from its account to a consumer's creditors resulting in harm to the consumer.
32. Additionally Respondent Farr has failed to remit premium to Attorneys' Title and has failed to account for the missing funds in the approximate amount of \$500,000.00, which resulted in approximately 6,400 policies not being issued to consumers.
33. Respondent Farr was a common owner for all Respondent Agencies named herein. As such, Respondent Farr knew or should have known that one or more of the Respondent Agencies were considered unlawful affiliated business arrangements or illegitimate title agencies.
34. Finally, as the responsible producer for Respondent Neighborhood Title, Respondent Farr was responsible for providing a complete response to the Division's inquiry letter pursuant to Insurance Regulation 1-1-8.

35. The Division is informed and believes, and thereon alleges that Respondent Farr failed to properly oversee Respondent Agencies, commingled premiums with business assets, improperly withheld, misappropriated, or converted to his own use moneys belonging to insurers received in the course of the business of insurance, committed unfair trade practices or fraud, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility. Respondent Farr, as responsible producer for Respondent Neighborhood, also failed to provide a complete response to an inquiry from the Division and the Division alleges that this conduct constitutes a violation of Insurance Regulation 1-1-8.
36. Respondent's conduct as alleged in this Count I is in violation of §§ 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e), (h) and (i) and 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-1-8, 1-2-1 and 3-5-1, which constitutes grounds for suspension or revocation of his insurance producer license and imposition of a civil penalty against him under § 10-2-804(4), C.R.S., of not more than \$1,000.00 for each violation and \$500.00 for violation of Insurance Regulation 1-1-8.

## COUNT II

### **Neighborhood Title, LLC**

**(Concerning violations of §§ 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e) and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-1-8, 1-2-1 and 3-5-1)**

37. The Division realleges paragraphs 1 through 36 above as though fully set forth herein.
38. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
39. Respondent Farr is the responsible producer for Respondent Neighborhood Title.
40. Respondent Neighborhood Title issued insufficient funds checks from its escrow account to its consumer's creditors resulting in harm to the consumer.
41. Respondent Neighborhood Title failed to treat funds received in the course of insurance business in a fiduciary capacity.

42. Upon information and belief, Respondent Neighborhood Title failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.
43. Further, Respondent Neighborhood Title failed to perform core title and settlement services and charged premiums for services being performed by another agency.
44. Respondent Neighborhood is an illegitimate title insurance agency for several reasons, including, but not limited to the fact that it did not perform core title and settlement services.
45. Finally, Respondent Neighborhood Title failed to provide a complete response to the Division's inquiry letter in violation of Insurance Regulation 1-1-8.
46. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent Neighborhood is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent Neighborhood Title's resident producer agency license must be summarily suspended by operation of law.
47. The Division is informed and believes, and thereon alleges that Respondent Neighborhood Title commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility. Respondent Neighborhood Title also failed to provide a complete response to an inquiry from the Division and the Division alleges that this conduct constitutes a violation of Insurance Regulation 1-1-8.
48. The Division is informed and believes, and thereon alleges that Respondent Neighborhood Title is not a legitimate title insurance agency and that its actions described above indicate that it was established for the purpose of obscuring kickbacks to affiliated business owners or primary business referrers.
49. Respondent Neighborhood Title's conduct as alleged in this Count II violates §§ 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e) and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-1-8, 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., of not more than \$1,000.00 for each violation and \$500.00 for its violation of Insurance Regulation 1-1-8.

**COUNT III**

**CPR Title, Inc.**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e), and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

50. The Division realleges paragraphs 1 through 49 as though fully set forth herein.
51. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
52. Respondent Farr is the responsible producer for Respondent CPR Title.
53. Upon information and belief, Respondent CPR Title failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.
54. Respondent CPR Title failed to treat funds received in the course of insurance business in a fiduciary capacity.
55. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent CPR Title is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent CPR Title's resident producer agency license must be summarily suspended by operation of law.
56. The Division is informed and believes, and thereon alleges that Respondent CPR Title commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.
57. Respondent CPR Title conduct as alleged in this Count III violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e) and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., of not more than \$1,000.00 for each violation.

**COUNT IV**

**CPR Title of Crested Butte, LLC**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e) and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

58. The Division realleges paragraphs 1 through 57 as though fully set forth herein.
59. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
60. Respondent Farr is the responsible producer for Respondent CPR Title of CB.
61. Upon information and belief, Respondent CPR Title of CB failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.
62. Respondent CPR Title of CB failed to treat funds received in the course of insurance business in a fiduciary capacity.
63. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent CPR Title of CB is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent CPR Title of CB's resident producer agency license must be summarily suspended by operation of law.
64. The Division is informed and believes, and thereon alleges that Respondent CPR Title of CB commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.
65. Respondent CPR Title of CB's conduct as alleged in this Count IV violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e) and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., of not more than \$1,000.00 for each violation.

**COUNT V**

**Fidelity Title, LLC**

**(Concerning Violations of §§ 10-2-801(1)(c) and 10-2-404(2)(d), C.R.S.)**

66. The Division realleges paragraphs 1 through 65 as though fully set forth herein.
67. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
68. Respondent Farr is the responsible producer for Respondent Fidelity Title.
69. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent Fidelity Title is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent Fidelity Title's resident producer agency license must be summarily suspended by operation of law.

#### **COUNT VI**

##### **First Choice Title, LLC**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e) and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

70. The Division realleges paragraphs 1 through 69 as though fully set forth herein.
71. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
72. Respondent Farr is the responsible producer for Respondent First Choice.
73. Upon information and belief, Respondent First Choice failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.
74. Respondent First Choice failed to treat funds received in the course of insurance business in a fiduciary capacity.
75. Further, Respondent First Choice failed to perform core title and settlement services and charged premiums for services being performed by another agency.

76. Respondent First Choice is an illegitimate title insurance agency for several reasons, including, but not limited to the fact that they did not perform core title and settlement services.
77. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent First Choice is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent First Choice's resident producer agency license must be summarily suspended by operation of law.
78. The Division is informed and believes, and thereon alleges that Respondent First Choice is not a legitimate title insurance agency and that its actions described above indicate that it was established for the purpose of obscuring kickbacks to affiliated business owners or primary business referrers.
79. The Division is informed and believes, and thereon alleges that Respondent First Choice commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.
80. Respondent First Choice's conduct as alleged in this Count VI violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e) and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., the of not more than \$1,000.00 for each violation.

#### **COUNT VII**

##### **Freedom Title & Escrow, LLC**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e) and (i), 10-2-404(2)(d), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

81. The Division realleges paragraphs 1 through 80 as though fully set forth herein.
82. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.

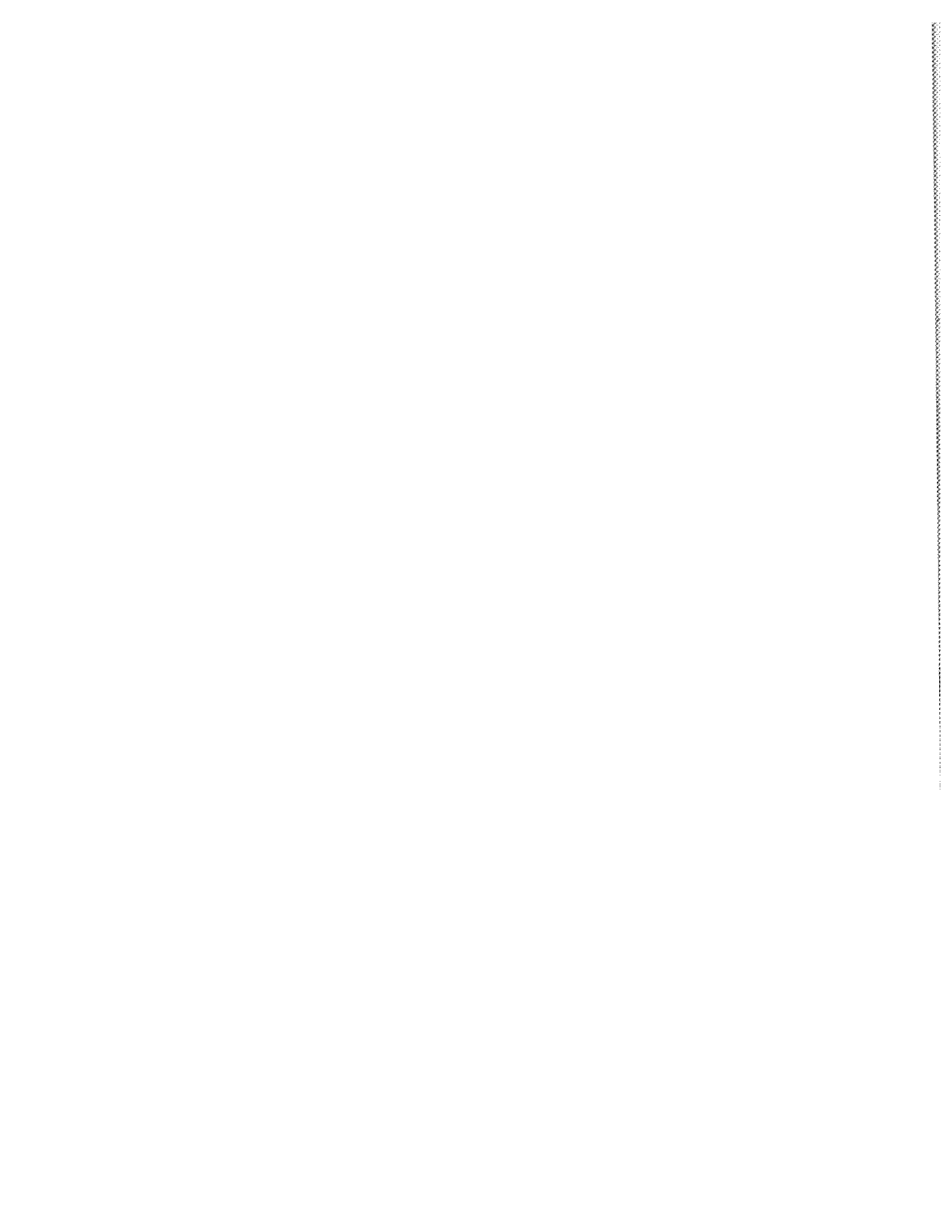
83. Respondent Farr is the responsible producer for Respondent Freedom Title.
84. Upon information and belief, Respondent Freedom Title failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.
85. Respondent Freedom Title failed to treat funds received in the course of insurance business in a fiduciary capacity.
86. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent Freedom Title is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent Freedom Title's resident producer agency license must be summarily suspended by operation of law.
87. The Division is informed and believes, and thereon alleges that Respondent Freedom Title commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.
88. Respondent Freedom Title conduct as alleged in this Count VII violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), and 10-2-801(1)(c), (e) and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., of not more than \$1,000.00 for each violation.

### COUNT VIII

#### **KD Title & Appraisal, LLC**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e) and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

89. The Division realleges paragraphs 1 through 88 as though fully set forth herein.
90. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
91. Respondent Farr is the responsible producer for Respondent KD Title.



92. Upon information and belief, Respondent KD Title failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.
93. Respondent KD Title failed to treat funds received in the course of insurance business in a fiduciary capacity.
94. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent KD Title is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent KD Title's resident producer agency license must be summarily suspended by operation of law.
95. Further, Respondent KD Title failed to perform core title and settlement services and charged premiums for services being performed by another agency.
96. Respondent KD Title is an illegitimate title insurance agency for several reasons, including, but not limited to the fact that they did not perform core title and settlement services.
97. The Division is informed and believes, and thereon alleges that Respondent KD Title is not a legitimate title insurance agency and that its actions described above indicate that it was established for the purpose of obscuring kickbacks to affiliated business owners or primary business referrers.
98. The Division is informed and believes, and thereon alleges that Respondent KD Title commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.
99. Respondent KD Title's conduct as alleged in this Count VIII violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e), and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., the of not more than \$1,000.00 for each violation.

**COUNT IX**  
**Lenders Title, LLC**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), and 10-2-801(1)(c), (e), and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

100. The Division realleges paragraphs 1 through 99 as though fully set forth herein.
101. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
102. Respondent Farr is the responsible producer for Respondent Lenders Title.
103. Upon information and belief, Respondent Lenders Title failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.
104. Respondent Lenders Title failed to treat funds received in the course of insurance business in a fiduciary capacity.
105. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent Lenders Title is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent Lenders Title's resident producer agency license must be summarily suspended by operation of law.
106. The Division is informed and believes, and thereon alleges that Respondent Lenders Title commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.
107. Respondent Lenders Title conduct as alleged in this Count IX violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e) and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., of not more than \$1,000.00 for each violation.

**COUNT X**  
**Top Notch Title, LLC**

**(Concerning Violations of §§ 10-2-801(1)(c) and 10-2-404(2)(d), C.R.S.)**

108. The Division realleges paragraphs 1 through 107 as though fully set forth herein.
109. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
110. Respondent Farr is the responsible producer for Respondent Top Notch.
111. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent Top Notch is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent Top Notch's resident producer agency license must be summarily suspended by operation of law.

**COUNT XI**

**Tri City Title, LLC**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), and 10-2-801(1)(c), (e), and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

112. The Division realleges paragraphs 1 through 111 as though fully set forth herein.
113. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.
114. Respondent Farr is the responsible producer for Respondent Tri City.
115. Respondent Tri City failed to treat funds received in the course of insurance business in a fiduciary capacity.
116. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent Tri City is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent Tri City's resident producer agency license must be summarily suspended by operation of law.
117. The Division is informed and believes, and thereon alleges that Respondent Tri City commingled premiums with business assets, improperly withheld, misappropriated,

or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.

118. Respondent Tri City's conduct as alleged in this Count XI violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b) and 10-2-801(1)(c), (e) and (i), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., of not more than \$1,000.00 for each violation.

### COUNT XII

#### **Uptown Title & Escrow, LLC**

**(Concerning Violations of §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e) and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1)**

119. The Division realleges paragraphs 1 through 118 as though fully set forth herein.

120. Pursuant to § 10-2-404(2)(d), C.R.S., every insurance agency must have designated a licensed insurance producer who is an officer, director or partner of the agency or business entity to be responsible for the agency or business entity's compliance with the insurance laws and rules of the state.

121. Respondent Farr is the responsible producer for Respondent Uptown Title.

122. Upon information and belief, Respondent Uptown Title failed to remit premium to Attorneys' Title, which resulted in approximately 6,400 policies not being issued to consumers.

123. Respondent Uptown Title failed to treat funds received in the course of insurance business in a fiduciary capacity.

124. Because the Division has summarily suspended Respondent Farr's insurance producer license, Respondent Uptown Title is now without a responsible producer in violation of § 10-2-404(2)(d), C.R.S. As such, Respondent Uptown Title's resident producer agency license must be summarily suspended by operation of law.

125. Further, Respondent Uptown Title failed to perform core title and settlement services and charged premiums for services being performed by another agency.

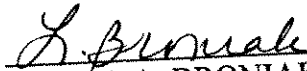
126. Respondent Uptown Title is an illegitimate title insurance agency for several reasons, including, but not limited to the fact that they did not perform core title and settlement services.
127. The Division is informed and believes, and thereon alleges that Respondent Uptown Title is not a legitimate title insurance agency and that its actions described above indicate that it was established for the purpose of obscuring kickbacks to affiliated business owners or primary business referrers.
128. The Division is informed and believes, and thereon alleges that Respondent Uptown Title commingled premiums with business assets, improperly withheld, misappropriated, or converted to its own use moneys belonging to insurers received in the course of the business of insurance, used fraudulent, coercive, or dishonest practices, and has demonstrated incompetence, untrustworthiness, or financial irresponsibility.
129. Respondent Uptown Title's conduct as alleged in this Count XII violates §§ 10-2-404(2)(d), 10-2-704(1)(a) and (b), 10-2-801(1)(c), (e), and (i), 10-11-108(1)(c) and (d), C.R.S., and Insurance Regulations 1-2-1 and 3-5-1, which constitute grounds for suspension or revocation of its insurance producer agency license and imposition of a civil penalty against it under § 10-2-804(4), C.R.S., the of not more than \$1,000.00 for each violation.

WHEREFORE, based on the allegations set forth above, the Division respectfully requests that the administrative law judge enter an initial decision for the following relief:

- a. Revocation or suspension of Respondent Farr's insurance producer license;
- b. Revocation or suspension of all Respondent Agencies insurance producer agency licenses;
- c. Imposition of civil penalties against Respondent Farr in a sum to be determined at hearing;
- d. Imposition of civil penalties against all Respondent Agencies in a sum to be determined at hearing; and
- e. Such other relief as the administrative law judge deems just and proper.

Respectfully submitted this 15<sup>th</sup> day of November, 2005.

JOHN W. SUTHERS  
Attorney General



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LAURA A. BRONIAK, 32204\*  
Assistant Attorney General  
Business & Licensing Section  
Attorneys for Division of Insurance

1525 Sherman Street, 5th Floor  
Denver, Colorado 80203  
Telephone: 303-866-5512  
Facsimile: 303-866-5395  
\*Counsel of Record

CERTIFICATE OF SERVICE

This is to certify that I have duly served the within ORDER OF SUMMARY  
SUSPENSION, NOTICE OF DUTY TO ANSWER, NOTICE TO SET AN INFORMAL  
PREHEARING CONFERENCE, NOTICE OF HEARING, AND NOTICE OF CHARGES upon  
all parties herein by depositing copies of same in the United States mail, postage prepaid, at  
Denver, Colorado, this 15<sup>th</sup> day of November, 2005 addressed as follows:

Douglas P. Farr  
1860 Blake St., Suite 900  
Denver, CO 80202

Neighborhood Title Services, LLC  
6350 West 92nd Avenue  
Westminster, CO 80031

CPR Title, Inc.  
6350 W. 92nd Ave.  
Westminster, CO 80031

CPR Title of Crested Butte, LLC  
1860 Blake St., Suite 81224  
Denver, CO 80202

CPR Title of Crested Butte, LLC  
1860 Blake St., Suite 900  
Denver, CO 80202

Fidelity Title, LLC  
1860 Blake St., Suite 900  
Denver, CO 80202

First Choice Title, LLC  
5200 DTC Parkway, #116  
Greenwood Village, CO 80111

Freedom Title & Escrow, LLC  
1860 Blake St., Suite 900  
Denver, CO 80202

Lenders Title, LLC  
7340 E. Caley Avenue  
Suite 115  
Greenwood Village, CO 80111

Top Notch Title, LLC  
1860 Blake St., Suite 900  
Denver, CO 80202

Tri City Title, LLC  
6350 West 92nd Avenue  
Westminster, CO 80031

Tri City Title, LLC  
6550 West 92nd Avenue  
Westminster, CO 80031

