

Best Practices Manual Of Realty Title Solutions

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Company Information:

REALTY TITLE SOLUTIONS, LLLP

2314 DEL PRADO BLVD S, SUITE #2-3 CAPE CORAL, FL 33990

www.RealtyTitleSolutions.com

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We are organized under the laws of Florida. Our up to date corporate filings can be found by following this link

<http://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=REALTYTITLESOLUTIONS%20A050000009421&aggregateId=domlp-a05000000942-1fecf792-fe7c-4656-aaef-364c041ceff2&searchTerm=Realty%20Title%20Solutions%2C%20LLLP%20&listNameOrder=REALTYTITLESOLUTIONS%20A050000009420>

We may, from time to time as business dictates, open or close additional branch offices. Any such office would be appropriately licensed as a branch office and comply with any and all state or local requirements. As our locations may change, please refer to Appendix A for our current list of locations.

Introduction of Best Practices as it relates to Title Insurance Agencies:

American Land Title Association has created a set of industry guidelines and standards that are to be complied with by individual title insurance agencies. Further, these guidelines are established by the Consumer Financial Protection Bureau and are established under the Dodd-Frank Act and are in compliance with the Gramm-Leach Biley Act. The industry guidelines presented by American Land Title Association are divided into “pillar’s” of information. Each of these pillars represent a different requirement for compliance. There are a total of seven pillars, each of which will be described in complete detail through this Best Practices Manual.

Our goal, through the publication of this Best Practices Manual is to set forth the specific ways in which we comply with each of the seven pillars of information as recommended by the American Land Title Association. As suggested by the American Land Title Association this manual will help illustrate to consumers and clients our company’s commitment to professionalism and best practices to ensure a positive and compliant real estate settlement experience.

Pillar One – Licensing

The goal of pillar one is to establish and maintain current license(s) as required to conduct the business of title insurance and settlement services.

REALTY TITLE SOLUTIONS, LLLP maintains the appropriate license(s) to operate in the state(s) that we list in Appendix B. From time to time, we will change our licenses and add or delete states as we deem necessary for the course of business. Therefore, please refer to our Appendix B for the most up to date information.

Each state has different licensing requirements and renewal procedures. We track our license(s) and ensure compliance for renewal prior to the expiration dates. We also comply with all state required fees as well as any continuing education requirements that may be required.

Pillar Two – Escrow Account Controls

The goal of pillar two is to adopt and maintain appropriate and effective escrow controls to meet client and legal requirements for safeguarding client funds.

REALTY TITLE SOLUTIONS, LLLP maintains all escrow funds in separate accounts as required by state regulations and underwriter requirements. These escrow accounts are reviewed on a daily bases and any discrepancies are dealt with immediately and with the utmost speed. We have ACH debit blocks set up on each of our escrow accounts so that money cannot be withdrawn from our escrow accounts. We reconcile our debits and credits on a weekly basis. Any open escrow balances or outstanding checks are reviewed. We employ three way escrow account reconciliation which is completed on a monthly basis, reviewed and then forwarded to our underwriter. Each signor on our escrow account must have an annual back ground check completed. Through our software, CLOSERS CHOICE , we are able to track all necessary and important items. We also employ Positive Pay as an additional security measure with our bank accounts.

Pillar Three – Information and Data Privacy

The goal of pillar three is to establish and maintain a written privacy and information security program to protect non-public information as required by the governing authority.

REALTY TITLE SOLUTIONS, LLLP maintains strict efforts to safeguard and control all necessary private information. All of our staff are trained and monitored as their actions relate to private information. Through our software system, CLOSERS CHOICE , data is controlled and secure. Each of our applicable staff members use their own log in credentials so that the continuity of data can be logged and maintained. We have controlled access to physical files and paperwork and all necessary documents are locked and controlled. We have regular destruction of physical documents. We have and maintain secure networks as provided by our data provider and interfaced with our software. Virus and malware protection is up to date and current on all of our computers and anyone logging in remotely must also comply with appropriate virus and malware protection. We do not allow our staff to use company computers for unauthorized websites. We maintain real time disaster recovery imaging of all of our data. We also require background checks on all personnel that are capable of accessing private and secure information.

Pillar Four – Settlement Policies and Procedures

The goal of pillar four is to adopt standard real estate settlement policies and procedures that ensure compliance with Federal and State Consumer Financial Laws.

REALTY TITLE SOLUTIONS, LLLP through the use of software provided by CLOSERS CHOICE , is able to track each file from start to finish and we can monitor the work as it is done on each individual file. Through this tracking, we are able to verify each step of the closing process to ensure our procedures are complied with. This

also allows us to confirm that each of the critical steps performed are to industry standards and that no component is overlooked.

Steps included in the monitored process:

- Order entry
- Search request
- Search review and exam
- Commitment production and issuance
- Compliance with items indicated on search
- Review and compliance with closing instructions
- Proper identification of parties involved
- Processing of payments indicated on approved settlement statement
- Accurate and timely recording of necessary documents
- Prompt issuance of final title policy

Closing Conditions:

- Compliance with Title Commitment
- Compliance with Purchase Agreement
- Compliance with Lender Closing Instructions
- Compliance with HUD regulations

If any of the aforementioned is adverse to the other, then we require clarification from all parties in writing to culminate the transaction

Disbursement Conditions:

- All items listed on settlement statement must match exactly to the disbursements
- Funds due from borrower must be received into the escrow account prior to funding.
- Funds due from borrower must meet the requirements listed by the lender
- Seller proceeds may not be assigned and are only to be disbursed to the seller listed on the settlement statement
- Money Laundering schemes are closely monitored and will not be tolerated. Any requests for multiple disbursements to the same payee are considered suspicious and will be properly reported

- Mortgage and lien payoffs must come directly from the lender being paid off
- Mortgage and lien payoffs must be in writing and include loan numbers and property address as applicable
- Mortgage and lien payoffs shall be wired in most cases directly from our escrow account

Disbursement of Escrowed Funds:

- Assurance that the proceeds have cleared and are good must be obtained prior to the refund or disbursement of any funds that have been placed into escrow
- All parties to the transaction must acknowledge the form of disbursement and the “payable” party

Voided or Replacement Check Issuances:

- REALTY TITLE SOLUTIONS, LLLP must determine that the check has not cleared our bank
- Stop payment must be placed on the original check including the check number, payee, amount and date prior to the issuance of a new check

Recording Procedure:

- Where available, immediate electronic recording is used
- If electronic recording is not available then shipping of the original documents by traceable carrier shall be substituted

Policy Production:

- Upon successful closing, disbursement and recording the final title policy shall be issued in accordance with our underwriting contract
- If an error is discovered during policy production, then best efforts will be made to rectify the offending situation. If the situation is not easily and immediately rectified, we shall notify our underwriter for appropriate guidance

Audit Procedure:

- At least annually, we are subject to audit by our underwriter(s). This audit shall include the reconciliation process of our escrow account, sample files for proper compliance as well as our policy log wherein we account for all policies issued by our agency on behalf of the underwriter. Any discrepancies uncovered during the audit are immediately documented and resolved.

File Management:

We maintain copies of all work documents related to each file including but not limited to:

- Search
- Commitment
- Lender Instructions
- Contracts and Agreements
- Settlement Statement
- All Closing Documents
- Affidavits and Attestments
- Identification of all Parties to the transaction
- Disbursement Ledgers
- Recording Documentation
- Payoff Instruction
- Proof of Payoffs
- Final Title Policy

All of these items are maintained for the prescribed period of time as required by either our underwriter agreement or the pertinent state or federal statute.

Pillar Five – Title Production

The goal of pillar five is to adopt and maintain appropriate procedures for the production, delivery, reporting and remittance of title insurance policies designed to meet both legal and contractual obligations.

REALTY TITLE SOLUTIONS, LLLP strives to deliver all final title policies within a timely manner. Our contract with our underwriter(s) further dictate the procedure for production, delivery, reporting and remittance of the final title policy. Prior to the issuance of the final tile policy, each file is reviewed for accuracy and to ensure that all of the terms and conditions of the title insurance commitment were satisfied and complied with and that all necessary documents and satisfactions have been duly recorded in the appropriate county of the property location.

Once all of the information is compiled, final title policies are created through our software system. Our software also track closed files pending final title policy issuance such that final title policies are issued in a timely manner.

Pillar Six – Errors and Omission and Fidelity Insurance Coverage

The goal of pillar six is to maintain appropriate levels of professional liability and fidelity coverage to ensure the financial capacity to stand behind the professional services rendered.

REALTY TITLE SOLUTIONS, LLLP maintains all levels of insurance as required by lenders, underwriters, and state requirements that is appropriate for the scope of our business. We hold coverage for Errors and Omission, including professional liability, fidelity coverage (employee theft, forgery and transfer fraud). In the states that require additional coverage such as surety bond, we also are compliant.

As our insurance will change from time to time, please refer to Appendix C for our current coverage.

Pillar Seven – Consumer Complaints

The goal of pillar seven is to adopt and maintain procedures for receiving and addressing consumer complaints so that any instances of poor service or non-compliance do not go undiscovered.

REALTY TITLE SOLUTIONS, LLLP pays close attention to our professional reputation. As such, any consumer complaints are dealt with immediately and swiftly so as to help the consumer to the best conclusion. Our first line of correction would lie with our staff. Our staff is specifically trained to listen for communications that would indicate a consumer is not satisfied with the situation. In most cases, providing proper communication eliminates consumer complaints. In the event a consumer makes a complaint, they are able to communicate that complaint through email, our website, by phone or in person. All consumer complaints are immediately addressed by our management for swift resolution. Through the process of investigating the complaint we will communicate the complaint to all parties involved to formalize a better understanding of the entire situation to determine the best course of action. This may include conversations with any or all of the service providers and if necessary a written follow up with our staff. This process will ensure a prompt resolution as well as a review of the policy or procedure to isolate any shortcomings in our business model. If we receive continual consumer complaints specific to a single staff member, that staff member shall be put on notice through verbal and/or written communication from management and if the behavior continues, it shall be grounds for disciplinary action.

Appendix A
Office Location(s)

REALTY TITLE SOLUTIONS, LLLP
2314 DEL PRADO BLVD S, SUITE #3 CAPE CORAL, FL 33990

Appendix B

State License(s)

Please see the following pages for copies of our license(s)

Appendix C

Insurance Coverage(s)

Please see the following pages for our insurance coverage