



K.E.L. Title Insurance Group, Inc.
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K.E.L. Title Insurance Group, Inc. SIU Description

Overview

Detection and reporting of insured fraud are critical to maintaining a healthy Florida insurance market. K.E.L. Title Insurance Group, Inc. (hereinafter referred to as “KELTIG”), provides the following outline of their plan identifying how this will be accomplished.

The corporate headquarters of KELTIG is in Altamonte Springs, FL. All claims are handled via the corporate office. KELTIG has identified one individual as the SIU Coordinator. The SIU Coordinator is the focal point for all matters related to fraud detection and investigation. These matters include oversight of SIU staff, continued training, communication and reporting to the Florida Department of Financial Services. As a title insurer, KELTIG expects very limited number of claims. Considering this the SIU unit consists of only two individuals. Additional staff will be added if necessary.

SIU Description Responses

The following are responses that are required by Section 626.9891(2), FS and rule chapter 69D-2-003.

1. Company Name: K.E.L. Title Insurance Group, Inc.
NAIC Company Code: 12953
NAIC Group Code: not applicable
2. Sheryl Hughes, President - Designated as SIU coordinator and responsible for implementation and monitoring of SIU procedures. Responsible for development of all SIU training programs. Responsible for all required reporting to the Florida Department of Financial Services.

Craig Lynd, Vice President/Director of Claims – Ensures the SIU procedures are followed and implemented properly. Approves any necessary or proposed changes to the SIU program.
3. KELTIG’s designated SIU Coordinator, SIU Staff and management team responsible for the detection and prevention of fraud, misappropriations, and other irregularities. SIU Coordinator, SIU Staff and management team will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately to the SIU Coordinator, who then coordinates all investigations with the legal department and other affected areas, both internal and external.
- 3a. KELTIG has established criteria that will be used to detect suspicious or fraudulent activity during investigations relating to title insurance written by KELTIG. All policies written by KELTIG are title insurance policies.

These criteria include but are not limited to:

- The timing of receipt of a claim relative to when the policy incept;
- The location of the covered property;
- Prior claims history
- Occupancy (or lack thereof) when a claim is filed;
- Extenuating circumstances suggesting a need for insurance proceeds.

- 3b. KELTIG has established criteria that will be used for the investigation of acts of suspected insurance fraud relating to title insurance written by KELTIG.

These criteria include but are not limited to:

- Review of public records;
- Internet search;
- Use of experts such as accountants, handwriting experts, or other special investigators;
- Review of bank records, utility records, credit card records, credit history and other financially significant information (only with insured's consent).

4. When information is gathered which tends to show a possible fraudulent situation, members of the KELTIG's SIU and legal department will meet to discuss further recommendations for handling.
- 4a. KELTIG will promptly report all suspected fraudulent insurance acts to the Division of Insurance Fraud in a digital reporting format or interface as provided at www.fldfs.com/fraud (electronically on Form DFS-L1-169 as provided for in Rule 69D-2.003(1)(d),F.A.C.).
- 4b. All reports submitted by KELTIG pursuant to item 4a above will contain information that clearly defines and supports the allegation of suspicious activity.
- 4c. KELTIG will record the date that suspected fraudulent activity is detected, and will record the date that reports of such suspected insurance fraud are sent directly to the Division of Insurance Fraud. This information will be recorded electronically in a spreadsheet format and updated routinely.
- 5a. KELTIG will provide training relative to detecting and investigating suspected fraudulent claims. Training will be provided by various experts in the field. KELTIG will also participate in any annual training as offered by the Florida Department of Financial Services, which will be recorded by the SIU Coordinator. KELTIG has available a digest of all Florida regulations or legislation on the subject of fraud as well as available industry information pertaining to fraud. KELTIG will assign SIU staff to attend conference or seminars) or share the information from these meetings) where the subject of fraud is discussed.
- 5b. Education and training is ongoing, using various articles and claims association information regarding fraud. In-house training seminars are also conducted on an annual basis. The SIU meets periodically to discuss the issue of fraud, including new patterns or trends, "red flags" or other criteria for detecting fraud, investigative procedures and fraud legislation.
6. The following individuals can be contacted relative to SIU activities and reporting:

Sheryl Hughes, President / SIU Coordinator

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Craig Lynd, Vice President / Director of Claims

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