

Fraud & Forgery Watch Program 2017 Procedures

Upon approval as outlined below of a Stewart Title Guaranty (STG) Fraud & Forgery Watch Award application, STG pays an amount (the "Award") to each qualifying Stewart associate or employee of an independent issuing agent. Please review a description of the Award process.

1. Eligibility for Award

Any currently employed Stewart Associate or employee of an independent agent is eligible for nomination for a STG Fraud & Forgery Watch Award. A Stewart Associate is defined as an employee of Stewart Title Guaranty Company, Stewart Title Company, and all Stewart Title affiliates. Employees of all independent agents that issue Stewart Title policies are eligible for Award nomination.

2. Amount of Award – "Up to \$1,000.00" in discretion of the STG General Counsel.

The president or manager of the title agency or affiliate may decide to split the Award among several people if the fraud or forgery "find" was a team effort.

3. Criteria

- a. Award nominee discovers fraud or forgery (or both) connected with an order for a Stewart Title Guaranty Company title insurance policy.
- b. Award nominee informs Supervisor or Agency Services Manager of facts surrounding the fraud or forgery "find."
- c. Only one Award is issued in connection with material fraud or forgery involving a particular tract of land offered for security of one or more title policies.
- d. Only one Award is granted for prevention of material scams or fraud connected with potential future orders for title insurance policies.
 - The Stewart associate who discloses information that prevents scam or fraud connected with several potential orders for title insurance will receive only one Award.
- e. The Stewart associate (or an independent agent associate) who is nominated for the award submits the following documentation to their Supervisor, or if the title agent's Office Manager or President is the applicant, documentation may be sent directly to Mary Vento @ mvento@stewart.com:
 - (1) Copy of title policy order sheet or preliminary title report
 - (2) Narrative detailing discovery of fraud or forgery
 - (3) Exemplars (copies of forged or falsified document and prior documents with signatures for comparison)
- f. **Completion of the award nomination form must be signed by both the nominee's Supervisor, and by the Office Manager or President of the title agency or affiliate. Completion of the current variable pay form must be signed by both the nominee's Supervisor, and by the Office Manager or President of the title agency or affiliate.**

- g. Within 60 days after the discovery of the fraud or forgery, the signed Award application is emailed to:

Mary Vento
Email: mvento@stewart.com
Stewart Legal Services/Fraud & Forgery Watch Program
Stewart Title Guaranty Company
1980 Post Oak Boulevard, Suite 710
Houston, Texas 77056
Phone: 800-729-1902 ext 7932

4. Approval of Award

Each Award nomination shall be approved by either 1) Stewart Title Guaranty Company Executive Vice President, Agency Services Group or his designee for award to associates from independent agents or 2) Stewart Title Company Group President or his designee for award to associates from Stewart Affiliates under their supervision. Final approval shall be in the discretion of Stewart Title Guaranty's General Counsel. The term "designee" shall include an Agency Services District Manager or a Stewart Title Company Group Senior Vice President or Vice President.

5. Transmittal and Presentation of Award

Upon review and approval of the nomination by Stewart Title Guaranty's General Counsel, the award will be issued to an STGC employee recipient by direct deposit. For affiliates or independent agencies, the award will be sent by regular mail directly to the recipient's home address supplied on the W-9 form, or otherwise as directed by a Group Vice President or District Manager.

6. All awards will be subject to appropriate tax withholdings, if applicable.

From 1990 through 2016, award winners have shielded Stewart Title Guaranty Company from **\$314,809,265.00**¹ in potential fraud and forgery claims (plus substantial, potential legal fees connected with ensuing settlement and litigation). By reducing losses caused by fraud and forgeries, we cooperate to build a stronger company for the benefit of Stewart policyholders and stockholders.

 **If you have any questions about this program please call Mary Vento at 1-800-729-1902 ext 7932, or email her at mvento@stewart.com.**

¹ The amount shown references policy amounts saved as of December 31, 2016

TO: Stewart Legal Services
Mary T. Vento
Stewart Title Guaranty Company
Fraud & Forgery Watch Program
1980 Post Oak Blvd., Suite 710
Houston, Texas 77056

E-mail: mvento@stewart.com

- RE:** Nomination of _____
1. Nominee's title _____
 2. Nominee's Home Address and Zip Code _____

 3. Name of Agency _____
 4. Agency Address _____

 5. Agency Telephone Number _____
 6. Nominee's Social Security Number _____
 7. Nominee's Supervisor, including
title and telephone number or e-mail _____
 8. Narrative description of event (Please Attach)
 9. Documents showing forgery or fraud (Please Attach)
 10. Order Number _____
 11. Policy amount (please include) _____
 12. Policy issued? _____
 13. Property Index posted as to forgery _____
 14. General Index posted as to forgery _____
 15. Signature of Office Manager, President
or Immediate Supervisor _____
 16. District Manager's Approval _____
 17. Region Manager's Approval _____