

Subject: California Title Successfully Passes Second "Best Practices" Audit

I am pleased to report that California Title Company has received SSAE No. 16 SOC 1 Type II and SOC 2 Type II certifications from their auditors, Squar Milner, Peterson, Miranda and Williamson, LLP (copies of which are available upon request). These certification reports (the "Certification Reports") were issued following a second extensive audit of the California Title Company FOC systems, which tested compliance with all of the American Land Title Association (ALTA) "Best Practices" as set forth in the auditors' 2014 SSAE No. 16 SOC 1 Type 1 and SOC 2 Type 1 Reports (the "2014 Reports"). This audit was an exhaustive multi-month examination of the entire CTC FOC and we passed the exam without one single exception. That means we have fully complied with all of the requirements set forth in the 2014 Reports.

Together these audits were a daunting task consisting of what we believe was the most complete examination of any title agency in the country. Understandably, these Certification Reports exceed 300 pages and describe the testing procedures in detail.

California title Company is immensely proud of the work that has been completed and is acutely aware that just because it is compliant today, does not mean it will be compliant tomorrow. To that end, we have instituted a training program to stay vigilant in maintaining our high standards and we have instituted an audit program to make sure that our systems are running as designed. CTC compliments ALTA in its design of Best Practices as the industry standard and will remain as not just the best service provider in the industry, but the most compliant as well.

If you have any questions or comments, please feel free to contact our Executive V.P. & General Counsel, William D. Burding, Jr., at billburding@octitle.com.

We appreciate your business and are working hard to be your provider of title and settlement services in the future.

Sincerely,
Bill Burding
Vice President and
Associate General Counsel
California Title Company