

OCCC CASE NO. L25-122

IN THE MATTER OF:	§	BEFORE THE
	§	
MASTER FILE NO.: 8779	§	OFFICE OF CONSUMER
OLD REPUBLIC FINANCIAL	§	
ACCEPTANCE CORPORATION	§	CREDIT COMMISSIONER
307 N. MICHIGAN AVE.	§	
CHICAGO, ILLINOIS 60601	§	STATE OF TEXAS

**ORDER IMPOSING ADMINISTRATIVE PENALTY**

The Office of Consumer Credit Commissioner (“OCCC”) issues this Order Imposing Administrative Penalty against Old Republic Financial Acceptance Corporation (“Old Republic Financial Acceptance Corporation”).<sup>1</sup>

**Statement of Facts and Law**

Old Republic Financial Acceptance Corporation is a regulated lender licensed by the OCCC under Chapter 342 of the Texas Finance Code. Old Republic Financial Acceptance Corporation operates under master file number 8779 at one licensed location, under license number 47828. Old Republic Financial Acceptance Corporation’s compliance officer is Carl Brauer, and its designated contact address is 307 N. Michigan Ave., Chicago, Illinois 60601.

A regulated lender must file annual reports with the Consumer Credit Commissioner (“Commissioner”).<sup>2</sup> A regulated lender must comply with all instructions from the OCCC relating to submitting the report.<sup>3</sup> The report is due by May 1 of each year for the prior calendar year’s loan activity.<sup>4</sup>

On October 12, 2020, the OCCC issued an Order to File Timely and Accurate Annual Reports against Old Republic Financial Acceptance Corporation for failing to timely file its 2019 annual report. Old Republic Financial Acceptance Corporation did not request a hearing on the Order, and the Order became final and enforceable. The Order required

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<sup>1</sup> Tex. Fin. Code § 14.208.

<sup>2</sup> Tex. Fin. Code § 342.559; 7 Tex. Admin. Code § 83.835.

<sup>3</sup> 7 Tex. Admin. Code § 83.835.

<sup>4</sup> Tex. Fin. Code § 342.559; 7 Tex. Admin. Code § 83.835; [https://occc.texas.gov/industry/regulated-lenders/annual\\_reports](https://occc.texas.gov/industry/regulated-lenders/annual_reports)

Old Republic Financial Acceptance Corporation to timely file complete and accurate future reports. Old Republic Financial Acceptance Corporation ultimately filed its 2019 annual report.

On September 21, 2021, the OCCC issued an Order Imposing Administrative Penalty against Old Republic Financial Acceptance Corporation for violating Chapter 342 of the Texas Finance Code by failing to timely file its 2020 annual report. The Order required Old Republic Financial Acceptance Corporation to file its 2020 annual report and to pay a \$500 administrative penalty. Old Republic Financial Acceptance Corporation ultimately filed its 2020 annual report and paid the administrative penalty.

Old Republic Financial Acceptance Corporation did not file its 2024 annual report with the Commissioner on or before May 1, 2025.

The Commissioner may issue an injunction ordering a regulated lender to file one or more complete, accurate, and timely annual reports if the Commissioner has reasonable cause to believe that the regulated lender is violating Chapter 342 of the Texas Finance Code.<sup>5</sup> The Commissioner may impose an administrative penalty on a regulated lender that violates an injunction.<sup>6</sup>

By failing to timely file its 2024 annual report, Old Republic Financial Acceptance Corporation has violated Chapter 342 of the Texas Finance Code and the OCCC's Order to File Timely and Accurate Annual Reports.

## Order

IT IS ORDERED that Old Republic Financial Acceptance Corporation:

1. pay an administrative penalty in the amount of **\$1,500.00** (calculated as \$1,500.00 each for Old Republic Financial Acceptance Corporation's one licensed location) within 30 days after the date of this Order; and

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<sup>5</sup> Tex. Fin. Code § 14.208.

<sup>6</sup> Tex. Fin. Code § 14.208(c).

2. file its 2024 annual report within 30 days after the date of this Order, if it has not already done so.

Regulated lender annual reports must be submitted through the OCCC's Application Licensing Examination and Compliance System (ALECS): [alecs.occctexas.gov](http://alecs.occctexas.gov). Instructions are available by clicking the "File Annual Report" button on the OCCC's home page, [occctexas.gov](http://occctexas.gov).

### **Right to Request Hearing**

You have the right to request a hearing regarding this Order.<sup>7</sup> To request a hearing, you must send a written hearing request to the OCCC no later than 30 days after the date of this Order.<sup>8</sup> You must send your request to Vivek Vedanarayanan, Assistant General Counsel, by mail to 2601 N. Lamar Blvd., Austin, Texas 78705, or by email to [vivek.vedanarayanan@occctexas.gov](mailto:vivek.vedanarayanan@occctexas.gov).

If you request a hearing, a hearing on this matter will be set and conducted in accordance with Chapter 2001 of the Texas Government Code.<sup>9</sup> If you fail to request a hearing by the deadline, this Order will be considered final and enforceable.<sup>10</sup>

All communications with the OCCC concerning this matter must be through Vivek Vedanarayanan, Assistant General Counsel, who may be contacted by mail at 2601 N. Lamar Blvd., Austin, Texas 78705, by telephone at 512-936-7623, or by email at [vivek.vedanarayanan@occctexas.gov](mailto:vivek.vedanarayanan@occctexas.gov).

Signed this 23rd day of July, 2025.

/s/ Leslie Pettijohn  
Leslie L. Pettijohn  
Consumer Credit Commissioner  
State of Texas

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<sup>7</sup> Tex. Fin. Code § 14.208(b).

<sup>8</sup> Tex. Fin. Code § 14.208(b).

<sup>9</sup> Tex. Fin. Code § 14.208(b).

<sup>10</sup> Tex. Fin. Code § 14.208(c).

## CERTIFICATE OF SERVICE

I certify that on July 23, 2025, a true and correct copy of this Order Imposing Administrative Penalty has been sent to Old Republic Financial Acceptance Corporation by the following:

Old Republic Financial Acceptance  
Corporation  
Attn: Carl Brauer, Compliance Officer  
307 N. Michigan Ave.  
Chicago, IL 60601  
carl\_brauer@republicics.com

- ☒ email
- ☐ eFileTexas.gov electronic service
- ☒ regular mail
- ☒ certified mail, return receipt requested  
# 9214 8901 9403 8300 0022 0023 95

Old Republic Financial Acceptance  
Corporation  
Attn: United States Corporation  
Company, Registered Agent  
211 E. 7th Street, Ste. 620  
Austin, TX 78701

- ☐ email
- ☐ eFileTexas.gov electronic service
- ☒ regular mail
- ☒ certified mail, return receipt requested  
# 9214 8901 9403 8300 0022 0024 01

/s/ Vivek V. Vedanarayanan  
Vivek V. Vedanarayanan  
Assistant General Counsel  
Office of Consumer Credit Commissioner  
State Bar No. 24127068  
2601 North Lamar Blvd.  
Austin, Texas 78705  
512-936-7623 (phone)  
vivek.vedanarayanan@occc.texas.gov