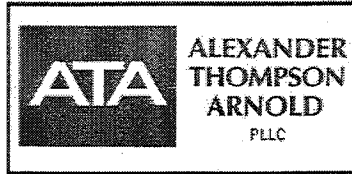


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**INDEPENDENT ACCOUNTANTS' REPORT
ON APPLYING AGREED-UPON PROCEDURES**

TO: Russell J. McCann, LLC dba McCann & Hubbard

In accordance with our engagement agreement with your firm, we have completed our analysis, utilizing the procedures enumerated in the attached supplement, which were agreed to by the management of McCann & Hubbard, solely to assist the users in evaluating the effectiveness of McCann & Hubbard's adherence to the Best Practices Framework established by the American Land Title Association (ALTA), as of June 30, 2015. The ALTA Best Practices Framework is designed to help meet compliance responsibility as required by the Consumer Financial Protection Bureau (CFPB).

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Based upon the information provided and the observations made during our test work, we conclude that McCann & Hubbard does meet the requirements of the ALTA Best Practices in effect on this date.

We were not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion on the accounting records. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of management and is not intended to be and should not be used by anyone other than this specified party.

Alexander Thompson Arnold PLLC

Alexander Thompson Arnold PLLC
Certified Public Accountants

Milan, Tennessee
July 30, 2015

McCann & Hubbard
ALTA Best Practices Assessment Procedures
June 30, 2015

Purpose

In order to comply with the American Land Title Association Best Practices Framework, assessment procedures are performed and presented to management based on the seven pillars (best practices) in place to help highlight policies and procedures the industry exercises to protect lenders and consumers, while ensuring a positive and compliant real estate settlement experience. This report includes the procedures and results of the review performed in accordance with agreed upon procedures.

Report Summary

Assessment procedures were performed based on these seven pillars:

Best Practice 1: Establish and maintain current License(s) as required to conduct the business of title insurance and settlement services.

Best Practice 2: Adopt and maintain appropriate written procedures and controls for Escrow Trust Accounts allowing for electronic verification of reconciliation.

Best Practice 3: Adopt and maintain a written privacy and information security program to protect Non-public Personal Information as required by local, state and federal law.

Best Practice 4: Adopt standard real estate settlement procedures and policies that help ensure compliance with Federal and State Consumer Financial Laws as applicable to the Settlement process.

Best Practice 5: Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance.

Best Practice 6: Maintain appropriate professional liability insurance and fidelity coverage.

Best Practice 7: Adopt and maintain written procedures for resolving consumer complaints.

Conclusion

Based on the procedures performed, we conclude that Russell J. McCann, LLC dba McCann & Hubbard has implemented, and adhered to, the American Land Title Association Best Practices Framework.