Washington Land Title Association



For Land's Sake

Issue No. 17

May 2024

President's Message Craig Trummel



ust about two years ago, I answered a call from Paul Hofmann. He indicated he was calling on behalf of the Washington Land Title Association nominating committee and asked if I would serve as the WLTA president from 2023/2024. I was hesitant since I did not live near Seattle. However, the Association's shift to Zoom board meetings during the near demisered as it forcible for me to come as president, where the ditional



the pandemic made it feasible for me to serve as president, where traditionally, the board meetings were held in person. Change creates opportunity; it did for me, and I hope it does for you.

Our industry can feel like it is static; we still issue policies and we still close transactions, but "change", as they say, is constant. In the last three presidential addresses, each of my predecessors mentioned "change" in their exiting remarks, and this year is no different. This year, as a result of the Oregon Land Title Association declining to host the PNW Convention, the WLTA is hosting the Convention one year

earlier than we planned. Many thanks to the Convention Committee and George Peters for stepping up and planning the Convention at a new time of year and new time of the week. We welcome your feedback on the changes. The WLTA is also grateful for all the other tasks George and his wife, Thesvy, perform on behalf of the Association. Thank you, George and Thesvy!

The Association strives to act as conduit of information about our industry, a forum for discussion, an educational resource, and a voice with Washington State regulators and legislators. Many volunteers, including our committee chairs, board members, and committee members, provide the time and effort needed for WLTA to achieve its goals. Please join me in expressing our gratitude to those volunteers. If you have not already done so, please consider volunteering your time and effort with WLTA.

I encourage all of you to find at least one person in your organization who has not been active on a committee or listened in on a board meeting and get them to do so. Encourage each employee to prepare and achieve the Washington Title Professional designation. This designation is a reflection of the knowledge held by the individual, but it also reflects on our industry as a whole in Washington, so please pursue it for yourself and encourage others as well.

Finally, I look forward to handing over the WLTA presidency to Jim Blair in May. I know he will do well for the Association and its members. Grateful to serve with you, my members of the WLTA.



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SEMINARS

Washington Title Professional

By Paul Hofmann—WTP Chair

WE WANT YOU! To be a Washington Title Professional (WTP) hat is a Washington Title Professional (WTP)? It is our Washington State professional designation designed to show both your commitment to our industry and your level of expertise. Why is it important? Acquiring a WTP designation confers heightened credibility and showcases your knowledge and dedication, thereby bolstering one's career trajectory. Secondly, it serves as a testament to professional competence and adherence to ethical



standards, instilling trust among clients and employers. It also promotes a culture of perpetual learning and growth. As a title professional, remaining abreast of industry advancements, changes in the underwriting environment and keeping your skills honed and sharp is incredibly important. Ultimately, your WTP designation epitomizes unwavering dedication, proficiency, and a resolute commitment to excellence. And if you buy today...I will throw in a certificate for framing, a nice pin for your lapel AND the 1st check mark in your application for the coveted National Title Professional (NTP) from the ALTA. See page 6 for more information about the NTP. *Paul Hofmann, WTP—AEGIS Land Title Group—WTP Chair.*

The Washington Land Title Association is pleased to recognize the following individuals as *Washington Title Professionals* for their professionalism, achievements, knowledge and dedication to the land title industry in the State of Washington.



Kathy Backstrom, WTP Dwight Bickel, WTP Lori Bullard, WTP & NTP Gerry Guerin, WTP Paul Hofmann, WTP Sean Holland, WTP Kevin Howes, WTP Gary Kissling, WTP J.P. Kissling, WTP Dan MacMillan, WTP Scott McDearmon, WTP George Peters, WTP Maureen Pfaff, WTP & NTP Megan Powell, WTP Bill Ronhaar, WTP & NTP Chris Rollins, WTP Marian Scott, WTP Michelle Taylor, WTP Craig Trummel, WTP Brenda Weaver, WTP

LEGISLATIVE REPORT

2024 Legislative Session

By Sean Holland and JP Kissling, Legislative Committee Co-Chairs



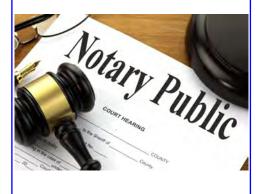
024 brought a short legislative session of only 60 days. Shorter session, fewer bills, less work, right? If that was the idea, the members of the legislature didn't get the memo.

Hundreds of bills were prefiled before the session began on January 8. Over 1,000 bills had been filed by the start of the second week of the session. JP Kissling screened all the bills, identifying about 100 that needed further review for potential impact on the title industry. Reviewing bills, suggesting amendments to some bills, and preparing testimony is a team effort. We thank the following members of the Legislative Committee who contributed during this vear's session: Chris Rollins, Craig Trummel, Dwight Bickel, George Peters, Gerry Guerin, Jim Blair, Lindsy Doucette, Megan Powell, Michelle Taylor, and Maureen Pfaff, our Vice Chair.

Despite the high number of total bills introduced, the number of bills requiring WLTA action this year was less than in most previous sessions. The WLTA did not sponsor any bills. We spoke in favor of a couple of bills. And while as usual there were some really bad bills, none developed the momentum that would have required full bore engagement on our part.

SENATE BILL 5840 Acknowledgment Requirement Eliminated for Unrecorded Leases but Retained for Recorded Documents

PASSED nate Bill 5840 was advanced by real property lawyers to eliminate the acknowledgment requirement for leases. The proponents reached out to us last year, well in advance of the session, to seek our input on their draft language. We were not concerned about loosening the formal requirements for leases that would never be placed in the public record. But we did want to see the formal requirements maintained for any lease or memorandum of lease that would be recorded. We proposed additional



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language that the lawyers incorporated into the bill. When Senate and House committees held hearings on the bill, we offered testimony in support. The bill passed with unanimous support in both houses and has been signed into law. RCW 64.04.010 now provides in relevant part that "[1]eases do not require acknowledgment, witness, or seals, but to be recorded, a lease and a memorandum of lease must have the lessee's and lessor's signatures acknowledged[.]"

House Bill 2240 Clarifying Process for Redacting Void Covenants from the Public Records Did Not Pass

ouse Bill 2240 would have made necessary changes to courtordered procedures removing unlawful covenants from the public records as enacted by Engrossed Second Substitute House Bill 1335 in 2021 and codified in RCW 49.60.227. The court-ordered procedures in ESSHB 1335 were composed by leadership of the state auditors

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association, working with the WLTA, in response to an earlier version of the bill that would have authorized the wholesale removal of documents containing illegal covenants from the land title records. As enacted, the 2021 legislation provided instead for a court driven process where a judge could order specific language struck and a corrected version of the original document substituted in the public records. The Washington Recording Standards Commission established a working group to provide detailed guidance on how to conduct the statutory process. The working group identified areas in the statute as enacted that would be difficult or impossible to carry out given procedures followed by court clerks and county auditors. House Bill

2240 would have implemented the necessary fixes. The WLTA would have given its full support to this bill. Unfortunately, the committee to which the bill was assigned never scheduled it for a hearing.



House Bill 2140 Abolishing Adverse Possession Did Not Pass poorly reasoned and badly written bill. It would have eliminated adverse possession in any case "where there is a properly recorded instrument in the auditor's office...establishing ownership and identifiable boundaries of the property[.]" In other words, adverse possession would be possible only in situations where the party holding record title did so under a deed with a legal description so defective that the boundaries of the property could not be identified. At the bill's one and only committee hearing the witness speaking in support was unable to answer even basic questions from the committee members. The WLTA presented testimony opposing the bill. The bill never came up for a committee vote.

Engrossed Substitute Senate Bill 5968 Regulating Home Equity Sharing Agreements under the Consumer Loan

Act

Did Not Pass ecent years have seen an increasing number of business strategies to provide an upfront financial benefit to homeowners and home buyers in exchange for a long-term obligation or share of the profit from the sale of a home. Home equity sharing agreements are arrangements between a homeowner and an

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investor where the investor fronts funds to the homeowner in return for a share of the proceeds when the home is sold or refinanced. The arrangements are not marketed as debt, yet the high return to the investor makes them akin to sub-prime mortgages. The bill would have subjected these arrangements to regulation under the Washington Consumer Loan Act. The bill was regulatory in nature and lacked provisions directly affecting recorded documents. The WLTA took no position on the bill, which passed the Senate, but not the House.



SENATE BILL 6290 Concerning Ownership of Agricultural Real Es-

TATE **DID NOT PASS** his bill would have banned the acquisition of agricultural, forestry, or mining land in Washington by non-resident aliens unless the laws of the aliens' home country permitted Americans to purchase agricultural land. The bill came one year after a Chinese spy balloon floating across the United States sparked a flurry of more than 80 bills in 33 states banning either foreign ownership of agricultural land, or purchases with negative effects on national security (sometimes defined as purchases by foreign adversaries, sometimes defined with respect to defense facilities and/or critical infrastructure. sometimes as a combination of the two). In the 2023 session the WLTA opposed a similar bill, House Bill 1412, that would have banned acquisition of agricultural land by foreign entities and required preclearance of all sales of agricultural land by the Washington Department of Agriculture. House Bill 1412 failed to advance out of committee in 2023 but was reintroduced in 2024. Neither Senate Bill 6290 nor House Bill 1412 received a hearing in 2024.

SENATE BILL 6034 **CLARIFYING THE EXCISE TAX TREATMENT OF DOCU-MENT RECORDING AND FIL-ING FEES RECEIVED BY TI-**TLE AND ESCROW BUSI-**NESSES FROM CLIENTS FOR REMITTANCE TO COUNTY RECORDING AND FILING OFFICES DID NOT PASS** enate Bill 6034 would have amended the statutory definition of "abstract, title insurance, and escrow services" so that funds received by a title company or escrow company for remittance to a county auditor to record documents would not be subject to sales tax. Those funds



would also not have been subject to business and occupation tax. The bill was introduced without input or prior notice to the WLTA, so we had no opportunity to lobby on its behalf in advance of the session. One of the problems with the bill was its purely partisan sponsorship, with the co-sponsors all being members of the minority party. The WLTA has always sought bipartisan support for its bills, and that approach has usually been successful. The WLTA gave testimony in favor of the bill. The fate of the bill was probably sealed when the Department of Revenue issued a fiscal note stating that the bill would result in a hit to the state general fund of \$18,200,000. The original committee never even scheduled a vote on the bill.

REGULATORY ISSUE

Washington Department of Revenue Auditing Title Companies and Assessing Sales Tax and Business & Occupation Tax on Recording Fees

The WLTA has learned of at least four member companies currently under Department of Revenue (DOR) audit and facing assessments for sales tax and business and occupation (B&O) tax on recording fees. The DOR position seems contrary to the statutes and regulations regarding both sales and B&O tax. WAC 458 -20-111 provides that advances paid on behalf of a customer or client are not includable (Continued on page 6)

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in gross income. The regulation contains the following example: "[W]here an attorney pays filing fees or court costs in any litigation, such fees and costs are paid as agent for the client and should be excluded from the gross income of the attorney." The charge to file a lawsuit with the court is assessed by the court clerk for a service that can be obtained solely through the court clerk. The charge to record a document with a county auditor is for a service that can be obtained solely through the county auditor. In both cases the funds are coming not from the agent, the attorney in the case of filing a complaint, or the title company in the case of recording a document, but from the principal, either the client behind the litigation or the customer whose transaction is being closed. The



two types of filing actions are functional equivalents. Nonetheless DOR takes the position that the regulatory exemption for attorneys does not apply to title companies.

None of the four audit proceedings that we are tracking has been finalized. If a WLTA member company were to reach the end of administrative proceedings and decide to file a court action, the WLTA could submit a friend of the court brief. The long-term solution may lie in amending state law, perhaps a second attempt at something like Senate Bill 6034, only with better preparation in advance of next session, and the seeking of bipartisan support. A key part of any future effort will be getting DOR to revise its fiscal impact statement in the light of the recently decided case of *Building Industry*

Association of Washington v. State. (see the Judicial Report for full discussion of the case). If the logic of the Court of Appeals decision is applied to the full \$303.50 charged to record a single page deed, more than 90% of that charge would be an excise tax, meaning that fully exempting recording fees from sales and excise tax should have a negative effect on the general fund that is only about 7% of the figure DOR provided regarding Senate Bill 6034.

Stand out from the Competition Invest in Your Career with ALTA

re you the smartest person in your office? Prove it with the American Land Title Association's (ALTA's) National Title Professional (NTP) designation. A measure of personal achievement, ALTA's professional acknowledgement affirms these experts are powerhouses of knowledge, experience and dedication essential to the title industry.

The NTP designation provides evidence of your industry proficiency as well as your commitment to professional development. It represents your achievement of excellence and enhances your status in the industry and among your colleagues! Other tangible benefits include:

- Individual recognition in ALTA publications and website
- Discounts on ALTA meetings
- Special benefits and recognition at ALTA meetings and select State Land Title Association events
- Right to use the NTP designation and logo in your business publications, website and correspondence, including marketing efforts, resume and networking activities

To apply for the NTP designation, you must meet several individual, licensing and training prerequisites. You must be an ALTA member and, if your State Land Title Association offers a similar designation, you also must earn your local credential before applying. Once all prerequisites are met, you must earn a minimum of 100 NTP points to qualify for consideration. Points can be earned in many areas, including industry experience, education and training as well as involvement with ALTA, your State Land Title Association and other professional organizations. All applications are reviewed by the NTP Council, a group of up to nine designees appointed by ALTA's Board of Governors.

Stand out from the crowd and start earning your NTP designation this year! For more information on the program, email <u>ntp@alta.org</u> or visit <u>www.alta.org/ntp</u>. **c**



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JUDICIARY REPORT

Ashley Callahan, Judiciary Committee Chair

PRELIEN NOTICE REQUIRE-MENT FOR CONSTRUCTION LIEN—LABOR VS. MATERI-ALS & EQUIPMENT

Velazquez Framing LLC v. Cascadia Homes, Inc., 2 Wash.3rd 552 (2024)

he Washington Supreme Court reversed the Court of Appeals holding that Velazquez Framing did not need a prelien notice for labor and remanded to the lower court to determine how much of the lien at issue was attributable to labor as opposed to materials and equipment. See, 2023 Judicial Committee Annual Report, Case No. 1, which reported on the Court of Appeals' decision.

Recall that Cascadia Homes is a general contractor and hired High End Construction ("High End") for the framing. High End orally agreed with Velazquez Framing ("Velazquez") to complete the framing, unbeknownst to Cascadia. Velazquez worked from Oct 15-Nov 1, 2019. Cascadia paid High End in October and November. High End did not pay Velazquez. Velazquez invoiced Cascadia in October and contacted it seeking payment but Cascadia did not pay. In January 2020, Velazquez filed a lien and followed up with a complaint in September 2020. There was no evidence that Velazquez gave any prelien notice to Cascadia.

Velazquez ultimately prevailed in its argument that RCW 60.04.031





(2) provides an exception to the prelien notice for parties contracting directly with the owner or owner's common law agent, *laborers whose claim of lien is based solely on labor*, or subcontractors who contract directly with the contractor (emphasis added). The Court held that the prelien notice requirement under RCW 60.04.031(1) and the exception in subsection (2) meant that Velazquez could enforce its lien for labor, despite not providing notice, so long as the subcontractor

Members of the WLTA Judiciary Committee are Ashley Callahan, Chair, and Erin Stines, Craig Trummel, Chris Rollins & Sean Holland

could provide evidence to segregate the value of the labor from the value of the materials and equipment.

IS THE "DOCUMENT REcording Surcharge" a Tax or a Fee?

Building Industry Association of Washington, et al. v. State of Washington and Thurston County Auditor, 543 P.3d 998 (2024)



uilding Industry Association of Washington and Soundbuilt Homes (collectively, "BIAW") filed a declaratory judgment lawsuit objecting to a "document recording surcharge" that was paid by builders for affordable housing and related funds. The document recording surcharge was enacted under RCW 36.22.250 and required county auditors to assess a \$183.00 per recorded document surcharge. One

percent of the surcharge (\$1.83) went to the auditors and the rest (\$181.17) went to fund homeless housing and assistance funds. BIAW challenged the surcharge as unconstitutional. BIAW lost at the trial court level, appealed, and lost at the appellate court level.

The appellate court held that the surcharge was a "tax", not a "fee" because the primary purpose was to "alleviate the housing crisis by financing certain funds, which is a public benefit." Only one percent is sent to the auditors to assist with their collection efforts, which is more akin to a service fee.

Moreover, the appellate court held that the tax was an "excise tax", not a "property tax" and thus not subject to a uniformity require-*(Continued on page 8)*

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ment imposed by the state constitution. This was because the "tax" was not levied on property ownership, but rather on the exercise of rights associated with owning prop-



erty. Individuals were required to pay the surcharge when they engage in activities associated with owning property like recording a deed, mortgage, or power of attorney to convey real property. They are also required to pay the surcharge when they record judgments, writs, name change orders, etc., which are activities unrelated to real property. Thus, the surcharge is related to an activity or transaction, not property ownership and is therefore an "excise tax" not a "property tax."

The case did not address the \$100 covenant homeownership assessment imposed on recorded documents by RCW 36.22.185. That statute only went into effect January 1, 2024, just a month before the Court of Appeals released the decision. While the \$100 charge under RCW 36.22.185 is labeled an assessment, it is the functional equivalent of the surcharge imposed under RCW 36.22.250. The combined \$283 in surcharge and assessment imposed on most recorded documents should therefore be consid-



ered an excise tax. Multiple WLTA members are currently in proceedings with the Department of Revenue over whether recording fees are subject to sales tax and the business and occupation tax. Recording fees paid for customers should not be subject to any tax. However, even if that argument does not prevail with DOR, the scope of potential liability has been reduced 90% by this case. Because the combined \$283 surcharge on most documents is an excise tax, it should not be subject to sales tax and B&O tax.

ESCROW THEFT - REVISITED -

Tang Real Estate Investments, Corp, v. Escrow Services of Washington, et. al., Court of Appeals (Div. 1) 2024 WL 1506460 A real estate development company (Tang) brought an action against escrow company (Escrow Services of Washington, or "ESW"), lender (Kiavi), assignee lender, and servicers for damages on two loan refinance transactions where the escrow agent absconded with the escrow funds before all escrow conditions were satisfied. The trial court dismissed Tang's claims against the ESW, Kiavi, its assignees, and loan servicers because it concluded that Tang bore the risk of loss at the time of the escrow agent's defalcation. Tang appealed and the appellate court reversed.

Kiavi funded Tang's refinance loans. ESW "was to make all necessary payments to satisfy all existing liens" as a condition precedent to closing on the new loans with Kiavi. According to the pleadings, escrow officer Aurora Rivera, of ESW "failed to follow the detailed closing instructions of Kiavi" and instead used the funds held in trust by ESW for personal benefit.

The appellate court stated that where, as here, escrow funds are



embezzled prior to the closing of escrow, three Washington cases set forth the controlling legal principles: Lechner v. Halling, 35 Wash.2d 903 (1950), Lieb v. Webster, 30 Wash.2d 43 (1948), and Angell v. Ingram, 35 Wash.2d 582 (1950). The rule is that when an escrow agent absconds with money held as a deposit, the loss falls on the person or party for whom escrow is acting as the agent. Here, taking the allegations in the pleadings as true, ESW had not completed the applicable escrow instructions – which included satisfying pre-existing loans - and was therefore holding the funds as an agent of Kiavi at the time the funds were absconded. Under the three cases cited above. Kaivi must therefore bear the risk of loss. The trial court's dismissal of Tang's claims against Kiavi was therefore in error.

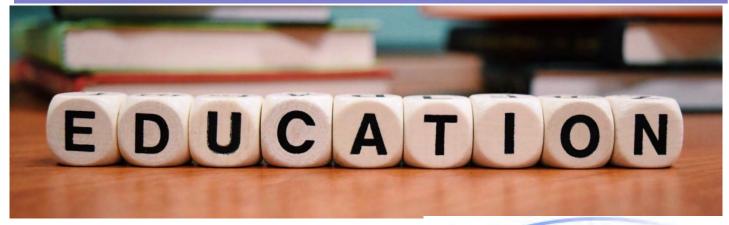
The appellate court held that Kiavi's assignees and servicers must also bear the risk of loss since the assignees and servicers accepted payments under contracts and thereby assumed the risk of those contracts, including risk of loss from defalcation. Dismissal of Tang's claims against them was therefore also in error.

The defense argued that Tang selected ESW as escrow agent and should bear the risk of the defalcation. The appellate court cited the *Angell* case in its confirmation that Tang's selection of ESW to provide escrow services is "immaterial to our analysis" absent evidence that Tang knew of, consented to, or approved of ESW's and Rivera's malfeasance.

SEMINARS

WLTA Education Seminars *By Gerry Guerin & Michelle Taylor*

Education Committee, Gerry Guerin and Michelle Taylor, Co-Chairs



Hello WLTA Members

I hope everyone is having a great spring so far. We will be hosting our annual Education Seminars on Saturday, September 7, 2024 in Yakima at the Yakima Convention Center and Saturday, October 5, 2024 in Lynnwood, at the Lynnwood Convention Center. My co-chair Michelle Taylor and I



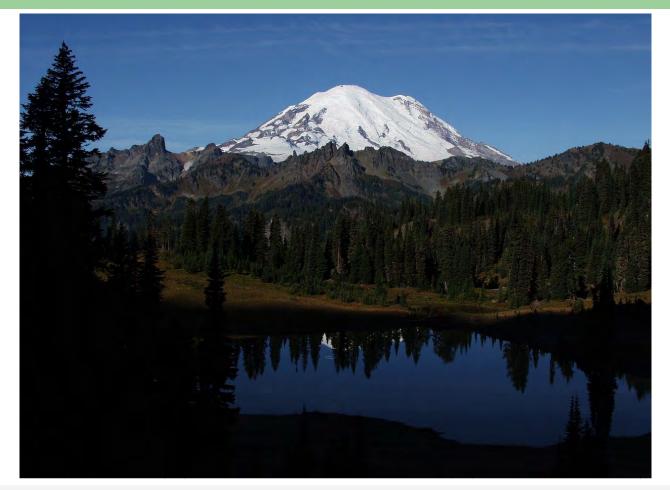
will be reaching out to all members as we start to put together a list of our always great talent. Please reach out to either of us if you have any topic suggestions and or if you would like to participate in one our both of the seminars. I hope to see you this fall and as always thank you for your continued support of the Washington Land Title Association. Gerry Guerin.



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For Your Calendar

2024 WLTA SEMINARS

The WLTA will have two educational seminars this fall with MCLE and WTP credit hours. Dates: Saturday, September 7 — Yakima Saturday, October 5 — Lynnwood Convention Center

Check our webpage for registration links.

2025 CONVENTION

The Pacific Northwest Land Title Convention will be hosted by the Idaho Land Title Association in 2025. When: May 19-21, 2025 Where: Coeur d'Alene, Idaho







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TITAC of WASHINGTON

A Political Action Committee of the Land Title Insurance Industry

e need your support. The Title industry has faced our fair share of challenges over the past 8 months. Changes to interest rates and our economy have created a very different market for our associates. Together with our lobbyist's help, we are monitoring roughly 40 bills that have a direct impact to the title industry. Couple that with dramatic upcoming changes to our elected officials in the state government landscape, creates a volatile environment for the years to come. Staying in front of influential representatives and maintaining a voice in Olympia will be vital.

Remember that TITAC is a non-profit organization that exists only through volunteers who have the same goals as you. If you are interested in supporting our cause please reach out to myself or send a contribution to the address below. Any amount is appreciated and truly put to great use. Contributions can come from your company or yourself.

Paul Hofmann — paul@agltg.com — 360-633-2086

TITLE ACTION NETWORK

Maureen Pfaff, Chair TAN

Title Action Network 2024

While most of us are focused on the day to day running of our companies, there are always issues brewing at the state and federal level that can have significant impact on our operations that we should be aware of. The challenge is finding the time to research the issues, decide what they might mean to our businesses and keep track of what is happening far off in state capitals or Washington DC. This is where ALTA and the Title Action Network come in. The ALTA staff work together with the Board of Governors and industry members who are involved on the Title Action Network committee to identify key issues, develop strategy, and engage with state and federal regulators and policymakers

to promote the industry's value. Additionally, ALTA works to educate title industry professionals on regulatory compliance.

Some of the current issues that ALTA is engaged on include Data Privacy, Digital Closings, Risks of Alternatives to Title Insurance, GSE Reform, Non-Title Recorded Agreements for Personal Service, Flood Insurance, Good Funds and the SECURE Notarization Act among others. Members of the Title Action Network are kept informed of current activity via email, zoom meetings and ALTA events. When needed, members are alerted with call-to-action emails and can easily reach out to their elected officials through pre-written, automated messages that only take minutes to send.

TAN membership is FREE and it only takes two minutes to sign up at <u>www.alta.org/TAN</u>. If you don't remember your ALTA login or don't have one, you can use the following link to sign up for TAN without signing in on the ALTA website:

https://www.alta.org/tan/join-tan-form.cfm

If you joined TAN in the past but haven't been an active member please be aware that TAN membership expires. TAN members can stay connected by opening TAN emails and taking actions. Each time a TAN member responds to a TAN alert, their membership auto-renews for another year! TAN members can also manually renew their membership by going to www.alta.org/tan and entering their ALTA login information.

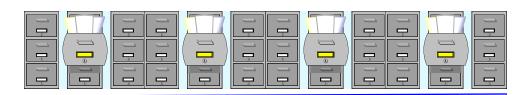
TAN is not just for national issues...the Washington Land Title Association also uses TAN to alert our members to state legislation or events and activities we want everyone to be aware of. ca







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