ORDER NO. E26-79

STATE OF NEW JERSEY

IN THE MATTER OF:

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| Proceedings by the Commissioner of Banking and Insurance, State of New Jersey, to fine, suspend and/or revoke the insurance producer license of: Bryan Nazor, Reference No 1003796; Dominick DeCarlo, Reference No 8912390; Adams Abstract, LLC, Reference No 1039342; Bergenline Real Estate Services, LLC, Reference No 207482; Broadway Title and Settlement Services, LLC, Reference No. 1107285; Community Real Estate Services, LLC, Reference No. 218567; Continental Title Services, LLC, Reference No. 1044004; Gold Coast Title Agency, LLC, Reference No. 1308913; and Main Street Title and Settlement Services, LLC, Reference No. 1077638. | ORDER TO SHOW CAUSE |

TO:

1. BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

2. DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

3. Bergenline Real Estate Services, LLC
   c/o BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

   Bergenline Real Estate Services, LLC
   c/o DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

4. Broadway Title and Settlement Services, LLC
   c/o BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

   Broadway Title and Settlement Services, LLC
   c/o DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

5. Community Real Estate Services, LLC
   c/o BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

   Community Real Estate Services, LLC
   c/o DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

6. Continental Title Services, LLC
   c/o BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

   Continental Title Services, LLC
   c/o DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

7. Gold Coast Title Agency, LLC
   c/o BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

   Gold Coast Title Agency, LLC
   c/o DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

8. Main Street Title and Settlement Services, LLC
   c/o BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

   Main Street Title and Settlement Services, LLC
   c/o DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

9. Adams Abstract, LLC
   c/o BRYAN NAZOR
   32 HILLCREST DR
   UPPER SADDLE RIVER, NJ 07458-2004

   Adams Abstract, LLC
   c/o DOMINICK DECARLO
   2100 LINWOOD AVE
   APT 21U
   FORT LEE, NJ 07024

This matter, having been opened by the Commissioner of Banking and Insurance, State of New Jersey ("Commissioner"), upon information that Respondents Bryan Nazor; Dominick DeCarlo; Adams Abstract, LLC; Bergenline Real Estate Services, LLC; Broadway Title and Settlement Services, LLC; Community Real Estate Services, LLC; Continental Title Services, LLC; Gold Coast Title Agency, LLC; and Main Street Title and Settlement Services, LLC (collectively "Respondents"), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Bryan Nazor ("Nazor") is actively licensed as a resident insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(a), which said license will expire on October 31, 2027; and

WHEREAS, Dominick DeCarlo ("DeCarlo") is actively licensed as a resident insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(a), which said license will expire on October 31, 2026; and

WHEREAS, Adams Abstract, LLC ("Adams Abstract") was licensed as a resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(b), which said license expired on May 31, 2023; and

WHEREAS, Bergenline Real Estate Services, LLC ("Bergenline") was licensed as a resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(b), which said license expired on May 31, 2024; and

WHEREAS, Broadway Title and Settlement Services, LLC ("Broadway") was licensed as a resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(b), which said license expired on May 31, 2023; and

WHEREAS, Community Real Estate Services, LLC ("Community") was licensed as a resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(b), which said license expired on May 31, 2024; and

WHEREAS, Continental Title Services, LLC ("Continental") was licensed as a resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(b), which said license expired on May 31, 2023; and

WHEREAS, Gold Coast Title Agency, LLC ("Gold Coast") was licensed as a resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(b), which said license expired on May 31, 2024; and

WHEREAS, Main Street Title and Settlement Services, LLC ("Main Street") was licensed as a resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32(b), which said license expired on May 31, 2024; and

WHEREAS, Respondents are subject to the provisions of the New Jersey Insurance Producer Licensing Act of 2001, N.J.S.A. 17:22A-26 to -48 ("Producer Act") and the Producer Licensing regulations promulgated thereunder, N.J.A.C. 11:17-1.1 to -2.17, and the regulations governing Insurance Producer Standards of Conduct, N.J.A.C. 11:17A-1.1 to 11:17D-2.8; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(d), the Commissioner shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by this act and Title 17 of the Revised Statutes or Title 17B of the New Jersey Statutes against any person who is under investigation for or charged with a violation of this act or Title 17 of the Revised Statutes or Title 17B of the New Jersey Statutes even if the person's license or registration has been surrendered or has lapsed by operation of law; and

WHEREAS, pursuant to N.J.A.C. 11:1-12.2, active officers shall be held individually responsible for all insurance related conduct of the corporate licensee; and

WHEREAS, pursuant to N.J.A.C. 11:17E-1.3(a), no person having been convicted of a felony involving breach of trust or dishonesty shall be employed in the business of insurance in this State in any capacity without having first obtained a waiver from the Commissioner; and

WHEREAS, pursuant to N.J.A.C. 11:17E-1.3(b), no insurer, producer, or any other person or independent contractor involved in the business of insurance in this State shall employ any prohibited person in any capacity without having first ensured that said prohibited person has obtained a waiver in accordance with this subchapter; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(1), an insurance producer shall not provide incorrect, misleading, incomplete or materially untrue information in the license application; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(2), an insurance producer shall not violate any insurance law, regulation, subpoena or order of the Commissioner or of another state's insurance regulator; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(6), an insurance producer shall not be convicted of a felony or crime of the fourth degree or higher; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(7), an insurance producer shall not commit any insurance unfair trade practice or fraud; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(8), an insurance producer shall not use fraudulent, coercive or dishonest practices, or demonstrate incompetence, untrustworthiness or financial irresponsibility in the conduct of insurance business in this State or elsewhere; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(15), an insurance producer shall not intentionally withhold material information or make a material misstatement in an application for a license; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(16), an insurance producer shall not commit any fraudulent act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(18), an insurance producer shall not fail to notify the Commissioner within 30 days of his or her conviction of any crime, indictment or the filing of any formal criminal charges; and

WHEREAS, pursuant to N.J.S.A. 17:22A-47(a), an insurance producer shall report to the Commissioner any administrative action taken against the insurance producer in another jurisdiction or by another governmental agency in this State, within 30 days of the final disposition of the matter; and

WHEREAS, pursuant to N.J.S.A. 17:22A-47(b), an insurance producer shall report to the Commissioner any criminal prosecution of the producer taken in any jurisdiction and shall include a copy of the initial complaint filed, the order resulting from the hearing and any other relevant legal documents, within 30 days of the initial pretrial hearing date; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a), the Commissioner may place on probation, suspend, revoke or refuse to issue or renew an insurance producer's license or may levy a civil penalty, or may take any combination of actions for violating the Producer Act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-45(c), any licensee violating the Producer Act and/or the Insurance Producer Standards of Conduct is subject to a penalty not exceeding $5,000.00 for the first offense and not exceeding $10,000.00 for each subsequent offense; additionally, the Commissioner may order restitution of moneys owed any person and reimbursement of costs of the investigation and prosecution; and

## ALLEGATIONS COMMON TO ALL COUNTS

IT APPEARING, that at all relevant times, Nazor was licensed as a resident insurance producer in the State of New Jersey; and

IT FURTHER APPEARING, that at all relevant times, DeCarlo was licensed as a resident insurance producer in the State of New Jersey; and

IT FURTHER APPEARING, that at all relevant times, Nazor and DeCarlo were the owners, active officers and Designated Responsible Licensed Producers ("DRLP") for each of the following business insurance producers: Adams Abstract; Bergenline; Broadway; Community; Continental; Gold Coast; and Main Street (collectively, "Business Insurance Producers"); and

IT FURTHER APPEARING, that on March 3, 2017, under State Grand Jury Indictment No. SGJ695-17-18 ("Indictment"), Nazor, along with others, was indicted in the State of New Jersey as a member of a criminal enterprise engaged in criminal racketeering involving the following felony offenses: acts of financial facilitation of criminal activity, in violation of N.J.S.A. 2C:21-25; securities fraud, in violation of N.J.S.A. 49:3-52; theft by deception, in violation of N.J.S.A. 2C:20-4; and theft by failure to make required disposition of property, in violation of N.J.S.A. 2C:20-9; and conspiracy to commit the foregoing felony crimes in violation N.J.S.A. 2C:5-2; and

IT FURTHER APPEARING, that on March 22, 2019, Nazor pled guilty to two counts of the Indictment: (1) Count One, conspiracy to engage in money laundering, as amended to a third-degree offense, in violation of N.J.S.A. 2C:5-2A(1) and 2C:21-25B(1); and (2) Count Seventeen, theft by failure to make required disposition of property, as amended to third-degree offense, in violation of N.J.S.A. 2C:20-9 and 2C:2-6A; and

IT FURTHER APPEARING, that on March 6, 2020, a Judgment of Conviction was entered against Nazor on the above referenced two felony charges, and he was sentenced to five-years non-custodial probation, 100 hours of community service and ordered to pay restitution in the amount of $1,898,279.06; and

**COUNT ONE**
(As to Nazor Only)

IT FURTHER APPEARING, that on March 3, 2017, Respondent Nazor was indicted in the State of New Jersey for multiple felony offenses as a member of a criminal enterprise engaged in the crime of racketeering involving acts of financial facilitation of criminal activity, securities fraud, theft by deception, and theft by failure to make required disposition of property; and

IT FURTHER APPEARING, that Nazor failed to report his indictment on multiple felony charges filed by the State of New Jersey to the Commissioner within 30 days thereof, in violation of N.J.S.A. 17:22A-47(b) and N.J.S.A. 17:22A-40(a)(2) and (18); and

**COUNT TWO**
(as to Nazor Only)

IT FURTHER APPEARING, that on or about October 2, 2017, Nazor completed and submitted to the New Jersey Department of Banking and Insurance ("DOBI") an application for the renewal of his insurance producer license; and

IT FURTHER APPEARING, that in said renewal license application, Nazor answered "NO" to "Question No. 1b" which stated: "Have you been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony, which has not been previously reported to this insurance department?"; and

IT FURTHER APPEARING, that the answer provided to Question No. 1b was false because, at time said renewal application was submitted, Nazor, in fact, had been charged with committing a felony which had not been reported to DOBI; and

IT FURTHER APPEARING, that by submitting false answers and incorrect information on his application to renew his insurance license, Nazor violated N.J.S.A. 17:22A-40(a)(1), (2), (8), (15) and (16); and

**COUNT THREE**
(as All Respondents)

IT FURTHER APPEARING, that on May 2, 2017, separate applications for the renewal of an insurance producer license were completed and submitted to DOBI on behalf of the following Business Insurance Producers: Adams Abstract, Broadway, Continental and Gold Coast; and

IT FURTHER APPEARING, that on May 2, 2018, an application for the renewal of an insurance producer license was completed and submitted to DOBI on behalf of Main Street; and

IT FURTHER APPEARING, that on May 3, 2018, separate applications for the renewal of an insurance producer license were completed and submitted to DOBI on behalf of the following Business Insurance Producers: Bergenline and Community; and

IT FURTHER APPEARING, that on each renewal license application, an answer of "NO" was given to "Question No. 1b" which stated: "Has the business entity or any owner, partner, officer or director of the business entity, or member or manager of a limited liability company, ever been convicted of, or is currently charged with committing a felony or had a judgment withheld or deferred for a felony which has not been previously reported to this insurance department?"; and

IT FURTHER APPEARING, that the answer provided to Question No. 1b was false because, at time said renewal applications were submitted, Nazor, in fact, had been charged with committing a felony which had not been reported to DOBI; and

IT FURTHER APPEARING, that by submitting false answers and incorrect information on their renewal license applications, all seven Business Insurance Producers – Adams Abstract; Bergenline; Broadway; Community; Continental; Gold Coast; and Main Street — violated N.J.S.A. 17:22A-40(a)(1), (2), (8), (15) and (16); and

IT FURTHER APPEARING, that all relevant times, Nazor and DeCarlo were the owners, active officers and DRLPs of said corporate licensees, and therefore were individually responsible for all insurance related conduct of said corporate licensees under N.J.A.C. 11:1-12.2, and thereby also violated N.J.S.A. 17:22A-40(a)(1), (2), (8), (15) and (16); and

**COUNT FOUR**
(As to Nazor Only)

IT FURTHER APPEARING, that on March 6, 2020, Nazor was convicted of the following two felony offenses: (1) conspiracy to engage in money laundering, as amended to a third-degree offense; and (2) theft by failure to make required disposition of property, as amended to third-degree offense; and

IT FURTHER APPEARING, that Nazor failed to report his felony convictions by the State of New Jersey to the Commissioner within 30 days thereof, in violation of N.J.S.A. 17:22A-47(b) and N.J.S.A. 17:22A-40(a)(2) and (18); and

**COUNT FIVE**
(As All Respondents)

IT FURTHER APPEARING, that on May 7, 2020, separate applications for the renewal of an insurance producer license were completed and submitted to DOBI on behalf of the following Business Insurance Producers: Bergenline, Community; and Main Steet; and

IT FURTHER APPEARING, that on May 11, 2021, separate applications for the renewal of an insurance producer license were completed and submitted to DOBI on behalf of the following Business Insurance Producers: Adams Abstract; Broadway; Continental and Gold Coast; and

IT FURTHER APPEARING, that on each renewal license application, an answer of "NO" was given to "Question No. 1b" which stated: "Has the business entity or any owner, partner, officer or director of the business entity, or member or manager of a limited liability company, ever been convicted of, or is currently charged with committing a felony or had a judgment withheld or deferred for a felony which has not been previously reported to this insurance department?"; and

IT FURTHER APPEARING, that the answer provided to Question No. 1b was false because, at time said renewal applications were submitted, Nazor, in fact, had been convicted of a felony offense which had not been reported to DOBI; and

IT FURTHER APPEARING, that by submitting false answers and incorrect information on their renewal license applications, all seven Business Insurance Producers Adams Abstract; Bergenline; Broadway; Community; Continental; Gold Coast; and Main Street violated N.J.S.A. 17:22A-40(a)(1), (2), (8), (15) and (16); and

IT FURTHER APPEARING, that all relevant times, Nazor and DeCarlo were the owners, active officers and DRLPs of said corporate licensees, and therefore were individually responsible for all insurance related conduct of said corporate licensees under N.J.A.C. 11:1-12.2, and thereby also violated N.J.S.A. 17:22A-40(a)(1), (2), (8), (15) and (16); and

**COUNT SIX**
(as to Nazor Only)

IT FURTHER APPEARING, that on or about November 5, 2021, Nazor completed and submitted to DOBI an application for the renewal of his insurance producer license; and

IT FURTHER APPEARING, that in said renewal license application, Nazor answered "NO" to "Question No. 1b" which stated: "Have you been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony, which has not been previously reported to this insurance department?"; and

IT FURTHER APPEARING, that the answer provided to Question No. 1b was false because, at time said renewal application was submitted, Nazor, in fact, had been convicted of two felony offenses which had not been reported to DOBI; and

IT FURTHER APPEARING, that by submitting false answers and incorrect information on his application to renew his insurance license, Nazor violated N.J.S.A. 17:22A-40(a)(1), (2), (8), (15) and (16); and

**COUNT SEVEN**
(As to All Respondents)

IT FURTHER APPEARING, that Nazor's felony convictions were for criminal offenses involving breach of trust and/or dishonesty; and

IT FURTHER APPEARING, that notwithstanding his convictions, Nazor continued to be employed in the business of insurance in this State, specifically managing the business operations of all seven business insurance producers: Adams Abstract, Bergenline, Broadway, Community, Continental, Gold Coast and Main Street; and

IT FURTHER APPEARING, that Nazor continued his employment in the business of insurance without first obtaining a waiver from the Commissioner, in violation of N.J.A.C. 11:17E-1.3(a); and

IT FURTHER APPEARING, that all seven business insurance producers continued to employ Nazor in the business of insurance in this State without having Nazor first obtain a waiver from the Commissioner, in violation of N.J.A.C. 11:17E-1.3(b); and

IT FURTHER APPEARING, that all relevant times, Nazor and DeCarlo were the owners, active officers and DRLPs of said corporate licensees, and therefore were individually responsible for all insurance related conduct of said corporate licensees under N.J.A.C. 11:1-12.2, and thereby also violated N.J.A.C. 11:17E-1.3(b) and N.J.S.A. 17:22A-40(a)(1), (2), (8) and (16); and

**COUNT EIGHT**
(as to Nazor Only)

IT FURTHER APPEARING, that at all relevant times, Nazor was also a licensed attorney and admitted to the bar of the State of New Jersey; and

IT FURTHER APPEARING, that effective July 26, 2019, Nazor was suspended from the practice of law in this State; and

IT FURTHER APPEARING, that effective July 21, 2020, Nazor was disbarred and permanently restrained and enjoined from practicing law in this State; and

IT FURTHER APPEARING, that Nazor failed to report this administrative action taken by State of New Jersey to the Commissioner within 30 days thereof, in violation of N.J.S.A. 17:22A-47(a) and N.J.S.A. 17:22A-40(a)(2); and

**COUNT NINE**
(as to Nazor only)

IT FURTHER APPEARING, that based upon underlying facts supporting his felony convictions and disbarment from the practice of law in 2020, Nazor engaged in fraudulent, unethical and dishonest practices, specifically as follows: (1) using deception, fraud and deceitful tactics to create the false impression that solicited funds in excess of $3 million dollars would be an investment in medical facilities when, in fact, said funds were diverted for his personal use and benefit; (2) engaging in financial facilitation of criminal activity, securities fraud and theft by deception in connection with the solicitation and use of said funds; and (3) failing to report to DOBI the criminal and administrative proceedings against him, in violation of N.J.S.A. 17:22A-40(a)(2), (6), (8) and (16); and

**NOW, THEREFORE, IT IS** on this 30 day of June, 2026

ORDERED, that Respondents appear and show cause why their New Jersey insurance producer licenses should not be suspended or revoked pursuant to N.J.S.A. 17:22A-40; and

IT IS FURTHER ORDERED, that Respondents appear and show cause why the Commissioner should not assess a civil penalty of not more than $5,000.00 for the first violation and $10,000.00 for each subsequent violation of the Producer Act and/or the Producer Standards of Conduct regulations, and order Respondents to pay restitution of moneys owed to any person, pursuant to the provisions of N.J.S.A. 17:22A-45(c); and

IT IS FURTHER ORDERED, that Respondents appear and show cause why, in addition to any other penalty, they should not be required to reimburse the Department for the costs of the investigation and prosecution as authorized by N.J.S.A. 17:22A-45(c); and

IT IS PROVIDED, that Respondents have the right to request an administrative hearing, to be represented by counsel or other qualified representative, at their expense, to take testimony, to call or cross-examine witnesses, to have subpoenas issued, and to present evidence or argument if a hearing is requested; and

IT IS FURTHER PROVIDED, that unless a request for a hearing is received within twenty (20) days of the service of this Order to Show Cause, the right to a hearing in this matter shall be deemed to have been waived by Respondents and the Commissioner shall dispose of this matter in accordance with law. A hearing may be requested by mailing the request to Matthew Gervasio, Supervising Investigator, Department of Banking and Insurance, P.O. Box 329, Trenton, New Jersey 08625, or by faxing the hearing request to the Department at (609) 292-5337. A copy of the request for a hearing shall also be sent to Dakar R. Ross, Deputy Attorney General, Department of Banking and Insurance, P.O. Box 117, Trenton, New Jersey 08625. The request from each respondent shall contain the following:

A. Respondent's full name, address, and daytime telephone number;

B. A statement referring to each charge alleged in this Order to Show Cause and identifying any defense intended to be asserted in response to each charge. Where the defense relies on facts not contained in the Order to Show Cause, those specific facts must be stated;

C. A specific admission or denial of each fact alleged in this Order to Show Cause. Where the Respondent has no specific knowledge regarding a fact alleged in the Order to Show Cause, a statement to that effect must be contained in the hearing request. Allegations of this Order to Show Cause not answered in the manner set forth above shall be deemed to have been admitted; and

D. A statement requesting a hearing.

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Susan Ochs
Acting Commissioner