

MARYLAND INSURANCE
ADMNISTRATION

v.

JOHN JOSEPH DWYER
1641 ROUTE 3 NORTH, SUITE 204
CROFTON, MARYLAND 21035

RPI NO.: 41982

And

JOSEPH CRAIG HUGHES
1641 ROUTE 3 NORTH, SUITE 204
CROFTON, MARYLAND 21035

RPI NO.: 63601

And

BELTWAY TITLE AND ABSTRACT, INC.
1641 ROUTE 3 NORTH, SUITE 204
CROFTON, MARYLAND 21035

RPF NO.: 4398

And

ADVANTAGE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

RPF NO.: 99921148

And

BENEFIT TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

RPF NO.: 109965

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BEFORE THE

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MARYLAND INSURANCE

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COMMISSIONER

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Case No.: MIA – 2011-01-028

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Case No.: MIA – 2011-01-029

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Case No.: MIA-2011-01-030

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Case No.: MIA-2011-01-031

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Case No.: MIA-2011-01-032

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And

CENTURY TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-033

RPF NO.: 4845

And

CHEVY CHASE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-034

RPF NO.: 115073

And

HERITAGE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-035

RPF NO.: 121252

And

HOME TOWNE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-201101-036

RPF NO.: 99958203

And

KARE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-037

RPF NO.: 99921129

And

MERIT TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-038

RPF NO.: 99928518

And

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**OPTIMUM TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035**

Case No.: MIA-2011-01-039

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RPF NO.: 99921147

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And

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**PROVIDENT TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035**

Case No.: MIA-2011-01-040

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RPF NO.: 99928516

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And

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**STANDARD TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035**

Case No.: MIA-2011-01-042

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RPF NO.: 99906762

Enf. File No.: PC 420 - 2010

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REVOCATION ORDER

This Order is entered by the Maryland Insurance Commissioner ("Commissioner") against to **John Joseph Dwyer** ("Dwyer"), **Joseph Craig Hughes** ("Hughes"), **Beltway Title and Abstract, Inc.** ("Beltway Title"), **Advantage Title Services, LLC** ("Advantage Title"), **Benefit Title Services, LLC** ("Benefit Title"), **Century Title Services, LLC** ("Century Title"), **Chevy Chase Title Services, LLC** ("Chevy Chase Title"), **Heritage Title Services, LLC** ("Heritage Title"), **Home Town Title Services, LLC** ("Home Towne Title"), **Kare Title Services, LLC** ("Kare Title"), **Merit Title Services, LLC** ("Merit Title"), **Optimum Title Services, LLC** ("Optimum Title"), **Provident Title Services, LLC** ("Provident Title"), **Standard Title Services, LLC** ("Standard Title"), (collectively referred to as "Respondents" and "Respondent

And

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**OPTIMUM TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035**

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Case No.: MIA-2011-01-039

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RPF NO.: 99921147

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And

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**PROVIDENT TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035**

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Case No.: MIA-2011-01-040

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RPF NO.: 99928516

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And

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**STANDARD TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035**

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Case No.: MIA-2011-01-041

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RPF NO.: 99906762

Enf. File No.: PC 420 - 2010

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REVOCATION ORDER

This Order is entered by the Maryland Insurance Commissioner ("Commissioner") against to **John Joseph Dwyer** ("Dwyer"), **Joseph Craig Hughes** ("Hughes"), **Beltway Title and Abstract, Inc.** ("Beltway Title"), **Advantage Title Services, LLC** ("Advantage Title"), **Benefit Title Services, LLC** ("Benefit Title"), **Century Title Services, LLC** ("Century Title"), **Chevy Chase Title Services, LLC** ("Chevy Chase Title"), **Heritage Title Services, LLC** ("Heritage Title"), **Home Town Title Services, LLC** ("Home Towne Title"), **Kare Title Services, LLC** ("Kare Title"), **Merit Title Services, LLC** ("Merit Title"), **Optimum Title Services, LLC** ("Optimum Title"), **Provident Title Services, LLC** ("Provident Title"), **Standard Title Services, LLC** ("Standard Title"), (collectively referred to as "Respondents" and "Respondent

Entities”) pursuant to Annotated Code of Maryland, Insurance § 1-101, *et seq.* (the “Insurance Article”), upon due investigation undertaken pursuant to § 2-201, and all other pertinent sections of the Insurance Article. As basis for this action, the Maryland Insurance Administration (“Administration”) states that:

I. Statement of Facts

1. Dwyer was issued a license to act as a resident insurance producer on January 1, 1996, and is authorized to act as a producer until his license expires on June 30, 2011.
2. Hughes was issued a license to act as a resident insurance producer on January 1, 1996, and is authorized to act as a producer until his license expires on June 30, 2011.
3. Beltway Title was issued a license to act as a resident producer firm on October 25, 1995, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration’s records, Dwyer and Hughes are each fifty percent (50%) owners of Beltway.
4. Advantage Title was issued a license to act as a resident producer firm on December 7, 2004, and is authorized to act as a producer firm until its license expires on December 6, 2012. According to the Administration’s records, Dwyer is the designated producer and was an original owner of Advantage Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 28, 2010, which has the same address as Beltway Title. ProfitCenters, LLC is not licensed with the Administration.
5. Benefit Title was issued a license to act as a resident producer firm on March 25, 1998, and is authorized to act as a producer firm until its license expires on June

- 30, 2011. According to the Administration's records, Dwyer and Hughes are the designated producers and Dwyer was an original owner of Benefit Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 28, 2010.
6. Century Title was issued a license to act as a resident producer firm on August 6, 1996, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration's records, Dwyer and Hughes are the designated producers and Dwyer was an original owner of Century Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 28, 2010.
 7. Chevy Chase Title was issued a license to act as a resident producer firm on August 25, 1998, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration's records, Dwyer, Hughes and Jennifer Dwyer Dent are the designated producers and Dwyer was an original owner of Chevy Chase Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
 8. Heritage Title was issued a license to act as a resident producer firm on February 3, 1999, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration's records, Dwyer, Hughes and Richard C. Turner are the designated producers and Dwyer was an original owner of Heritage Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
 9. Home Towne Title was issued a license to act as a resident producer firm on

August 15, 2006, and is authorized to act as a producer firm until its license expires on August 14, 2012. According to the Administration's records, Dwyer, Hughes and Richard C. Turner are the designated producers and Dwyer was an original owner of Home Towne Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.

10. Kare Title was issued a license to act as a resident producer firm on December 7, 2004, and is authorized to act as a producer firm until its license expires on December 6, 2012. According to the Administration's records, Dwyer is the designated producer and Dwyer was an original owner of Kare Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
11. Merit Title was issued a license to act as a resident producer firm on March 29, 2005, and is authorized to act as a producer firm until its license expires on March 28, 2011. According to the Administration's records, Dwyer is the designated producer and Dwyer was an original owner of Merit Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
12. Optimum Title was issued a license to act as a resident producer firm on December 7, 2004, and is authorized to act as a producer firm until its license expires on December 6, 2012. According to the Administration's records, Dwyer is the designated producer and Dwyer was an original owner of Optimum Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.

13. Provident Title was issued a license to act as a resident producer firm on March 29, 2005, and is authorized to act as a producer firm until its license expires on March 28, 2011. According to the Administration's records, Dwyer is the designated producer and Dwyer retains a twenty five percent (25%) ownership interest in Provident Title. Dwyer notified the Administration on June 6, 2010 that ProfitCenters had a fifty percent (50%) ownership interest in the company.
14. Standard Title was issued a license to act as a resident producer firm on February 2, 2004, and is authorized to act as a producer firm until its license expires on February 19, 2012. According to the Administration's records, Dwyer is the designated producer and Dwyer retains a twenty five percent (25%) ownership interest in Standard Title. Dwyer notified the Administration on June 6, 2010 that ProfitCenters had a fifty percent (50%) ownership interest in the company.
15. On December 20, 2010, the Administration received notice from Linda L. Rose, Vice President and Maryland State Manager of Fidelity National Title Group ("Fidelity National") stating that Fidelity National terminated its Agency Agreements with Dwyer, Hughes, Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Home Town Title, Kare Title, Merit Title, and Optimum Title, effective that date.
16. Commonwealth Land Title Insurance Company ("Commonwealth"), a subsidiary of Fidelity National, entered in to Agency Agreements on May 1, 2005 with Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Kare Title, Merit Title, and Optimum Title, and with Home Towne Title on August 21, 2006, appointing those companies as agents of Commonwealth for the purpose of issuing title insurance commitments, policies

and endorsements and other title assurance approved by Commonwealth.

17. Pursuant to the Agency Agreements, the Respondents were required to keep all funds received by the Agents from any source in connection with transactions in which Policies of the Company are to be issued, in a federally insured financial institution, in an account separate from the agent's individual accounts and designated as an "escrow" or settlement funds account, and to disburse such funds only for the purposes for which the same were entrusted. The funds held by Beltway Title and the Respondent Entities in their escrow accounts were trust funds that belonged to different lenders, sellers, and borrowers that were involved in various real estate transactions. The Agents have acknowledged that all such funds constitute trust funds.
18. In December 2010, Fidelity National performed a formal audit of Beltway Title, which included an examination of its escrow account. The audit revealed several irregularities in which funds were being transferred from the escrow account to Beltway Title's various operating accounts. Funds received into the Escrow account were to be held solely for disbursement in loan settlements for lien payoffs and other obligations. The auditors discovered that funds intended for disbursement were diverted to non-escrow accounts. Upon questioning by Fidelity National representatives, it was admitted that funds were being taken from Escrow to pay for employee payroll and other office expenses. As a result, the funds received by Beltway Title and the Respondent Entities in connection with the real estate transactions were not being utilized for the purpose of which they were entrusted. Specifically the auditors discovered the following transactions from a Bank of America escrow account to various Bank of America

operating accounts:

Transfer Date	Transfer from Account # Last 4 digits	Transfer to Account # Last 4 digits	Transfer to Type of Account	Transfer Amount
4/29/2010	on file	on file	Operating - Office	154,000.00
5/12/2010	with	file	Operating - Release	33,000.00
5/27/2010	original	with	Operating - JCB Unicom	80,000.00
6/14/2010		original	Operating - Release	53,000.00
6/29/2010		al	Operating - Office	150,000.00
7/29/2010			Operating - Office	25,000.00
8/3/2010			Operating - Release	40,000.00
8/31/2010			Operating - JCB Unicom	85,000.00
9/13/2010			Operating - Release	33,000.00
9/29/2010			Operating - Release	50,000.00
10/12/2010			Operating - Release	54,000.00
10/14/2010			Operating - Release	83,000.00
10/18/2010			Operating - Release	62,000.00
10/22/2010			MAHT Escrow	130,000.00
10/28/2010			Operating - Release	33,500.00
10/28/2010			Operating - JCB Unicom	67,000.00
11/15/2010			Operating - Release	33,000.00
11/29/2010			Operating - Release	30,000.00
11/29/2010			Operating - JCB Unicom	63,000.00
11/30/2010			Operating - JCB Unicom	30,000.00
			Total Net Transfers	
			From Escrow	1,028,500.00

The Respondents were using the funds that were being received to cover the conversions or misappropriations of money from the Escrow account. The One Million Twenty Eight Thousand Five Hundred and 00/100 Dollars (\$1,028,500.00) will now have to be paid by Fidelity National to cover disbursement shortages. The audit determined that as of December 16, 2010, the Beltway Title escrow account was overdrawn in the amount of approximately \$157,000.00, and as of December 20, 2010 contained only approximately \$32,000.00.

19. The Administration has documents evidencing the inappropriate transfers out of Beltway's escrow account and into other accounts.
20. On December 21, 2010, Commonwealth and Chicago filed a law suit against the Respondents in the Circuit Court for Montgomery County, Maryland, Case Number 342024-V, seeking a restraining order freezing all bank accounts of the Respondents. On January 4, 2011, the parties entered a Consent Order of Preliminary Injunction authorizing, Chicago and Commonwealth to, among other things, take possession of the files and assets of the Respondents, granting full access to all documents and files of JCB Unicom, LLC¹ and the Respondents, and freezing all bank accounts of the Respondents.

II. Violations

21. By the conduct described herein, Dwyer, Hughes, and the Respondent entities have violated § 10-121(b) and § 10-126(a)(1), (4), (6), (12), and (13) and/or (b)(2) and are subject to disciplinary action under the Insurance Article.
22. Section 10-121 provides in pertinent part:

§ 10-121. Title Insurance Producers.

(b) *Conversion or misappropriation of money* – A title insurance producer may not convert or misappropriate money received or held in escrow or trust while:
 - (1) acting as a title insurance producer; or
 - (2) providing any escrow, closing, or settlement services.
23. Section 10-126 provides in pertinent part:

§ 10-126. Denials, suspensions, revocations, and refusals to renew or reinstate penalties.

(a) *Grounds* – The Commissioner may deny a license to an applicant under §§ 2-210 through 2-214 of the article, or suspend, revoke, or refuse to renew or reinstate a license after notice and opportunity for hearing under a §§ 2-210

¹ JCB Unicom, LLC is a company established by Dwyer and Hughes in January 1994 to act as a parent company of the Respondent Entities. It is not licensed by the Administration.

through 2-214 of the article if the applicant or holder of the license:

- (1) has willfully violated this article or another law of the State that relates to insurance;
 - (4) has misappropriated, converted, or unlawfully withheld money belonging to an insurer, insurance producer, beneficiary, or insured;
 - (6) has committed fraudulent or dishonest practices in the insurance business;
 - (12) has failed or refused to pay over on demand money that belongs to an insurer, insurance producer, or other person entitled to the money;
 - (13) has otherwise shown a lack of trustworthiness or competence to act as an insurance producer;
- (b) This subsection applies in any case that involves a business entity if the violation was committed by an individual who is:
- (i) an insurance producer;
 - (ii) 1. in the case of a limited liability company, an officer, director, member or manager; * * *
 - 3. in the case of a corporation, a director, officer, or owner, or
 - (iii) an individual with direct control over the fiscal management of the business entity.

24. By the conduct herein described, Dwyer, Hughes, and the Respondent Entities have violated § 10-121(b) and § 10-126(a)(1), (4), (6), (12) and (13) and/or § 10-126(b). As such, the Respondents are subject to disciplinary action under the Insurance Article.

III. Sanctions

25. By the facts and violations stated above, Dwyer, Hughes, and the Respondent entities' licenses to act as producers in the State of Maryland are subject to revocation as stated in § 10-126(a) and (b) of the Insurance Article.

26. In view of the gravity of the violations and considering that insurance producers are in a position of trust and responsibility, revocation is the appropriate penalty in this case. The public justifiably expects the Administration to ensure that only


trustworthy producers are permitted to conduct insurance business. Therefore, the authority of Dwyer, Hughes, Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Home Town Title, Kare Title, Merit Title, Optimum Title, Provident Title and Standard Title to act as insurance producers shall be revoked.

WHEREFORE, for the reasons set forth above, and subject to your right to request a hearing, it is this 28th day of January, 2011, **ORDERED** that the resident producer license number RPI 41982 for **John Joseph Dwyer**, RPI 63601 for **Joseph Craig Hughes**, RPF 4398 for **Beltway Title and Abstract, Inc.**, RPF 99921148 for **Advantage Title**, RPF 109965 for **Benefit Title Services, LLC**, RPF 4845 for **Century Title Services, LLC** RPF 115073 for **Chevy Chase Title Services, LLC**, RPF 121252 for **Heritage Title Services, LLC**, RPF 99958203 for **Home Towne Title Services, LLC**, RPF 99921129 for **Kare Title Services**, RPF 99928518 for **Merit Title Services, LLC**, RPF 99921147 for **Optimum Title Services, LLC**, RPF 99928516 for **Provident Title Services, LLC**, and RPF 99906762 for **Standard Title Services, LLC** are **REVOKED**.

ELIZABETH SAMMIS
ACTING INSURANCE COMMISSIONER

on file with original

By:



NANCY GRODIN
Associate Commissioner
Compliance & Enforcement

RIGHT TO REQUEST A HEARING

Pursuant to § 2-210 and COMAR 31.01.01.03, you may request a hearing on this Order. This request must be in writing and be received by the Commissioner within thirty (30) days of the date of the letter accompanying this Order.

Pursuant to § 2-212 of the Insurance Article, however, the Order shall be stayed pending a hearing only if a demand for hearing is received by the Commissioner within ten (10) days after the Order is served.

The request for hearing must be made in writing. The request must be addressed to the Maryland Insurance Administration, 200 St. Paul Place, Suite 2700, Baltimore, Maryland 21202, ATTN: Sharon Kraus, Appeals Clerk. Failure to request a hearing timely or to appear at a scheduled hearing will result in a waiver of your rights to contest this Order and the Order shall be final on its effective date.

CENTURY TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-047

RPF NO.: 4845

And

CHEVY CHASE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-048

RPF NO.: 115073

And

HERITAGE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-049

RPF NO.: 121252

And

HOME TOWNE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-050

RPF NO.: 99958203

And

KARE TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-051

RPF NO.: 99921129

And

MERIT TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA-2011-01-052

RPF NO.: 99928518

And

OPTIMUM TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA – 2011-01-053

RPF NO.: 99921147

And

PROVIDENT TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA – 2011-01-054

RPF NO.: 99928516

And

STANDARD TITLE SERVICES, LLC
1641 ROUTE 3 NORTH, SUITE 202
CROFTON, MARYLAND 21035

Case No.: MIA – 2011-01-055

RPF NO.: 99906762

Enf. File No.: PC 420 - 2010

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ORDER OF SUMMARY SUSPENSION

Pursuant to Annotated Code of Maryland, State Government § 10-226(c)(2) and §§ 1-101, *et seq.* of the Insurance Article, the Maryland Insurance Commissioner (“Commissioner”) hereby summarily suspends License RPI 41982 issued to **John Joseph Dwyer** (“Dwyer”), License RPI 63601 issued to **Joseph Craig Hughes** (“Hughes”), License RPF 4298 issued to **Beltway Title and Abstract, Inc.** (“Beltway Title”), License RPF 99921148 issued to **Advantage Title Services, LLC** (“Advantage Title”), License RPF 109965 issued to **Benefit Title Services, LLC** (“Benefit Title”), License RPF 4845 issued to **Century Title Services, LLC** (“Century Title”), License RPF 115073 issued to **Chevy Chase Title Services, LLC** (“Chevy Chase Title”), License RPF 121252 issued

to **Heritage Title Services, LLC** (“Heritage Title”), License RPF 99958203 issued to **Home Town Title Services, LLC** (“Home Towne Title”), License RPF 99921129 issued to **Kare Title Services, LLC** (“Kare Title”), License RPF 99928518 issued to **Merit Title Services, LLC** (“Merit Title”), License RPF 99921147 issued to **Optimum Title Services, LLC** (“Optimum Title”), License RPF 99928516 issued to **Provident Title Services, LLC** (“Provident Title”), and License RPF 99928516 issued to **Standard Title Services, LLC** (“Standard Title”), for the following reasons:

1. Dwyer was issued a license to act as a resident insurance producer on January 1, 1996, and is authorized to act as a producer until his license expires on June 30, 2011.
2. Hughes was issued a license to act as a resident insurance producer on January 1, 1996, and is authorized to act as a producer until his license expires on June 30, 2011.
3. Beltway Title was issued a license to act as a resident producer firm on October 25, 1995, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration’s records, Dwyer and Hughes are each fifty percent (50%) owners of Beltway Title.
4. Advantage Title was issued a license to act as a resident producer firm on December 7, 2004, and is authorized to act as a producer firm until its license expires on December 6, 2012. According to the Administration’s records, Dwyer is the designated producer and was an original owner of Advantage Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership

interest to ProfitCenters, LLC¹ on June 28, 2010, which has the same address as Beltway Title.

5. Benefit Title was issued a license to act as a resident producer firm on March 25, 1998, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration's records, Dwyer and Hughes are the designated producers and Dwyer was an original owner of Benefit Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 28, 2010.
6. Century Title was issued a license to act as a resident producer firm on August 6, 1996, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration's records, Dwyer and Hughes are the designated producers and Dwyer was an original owner of Century Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 28, 2010.
7. Chevy Chase Title was issued a license to act as a resident producer firm on August 25, 1998, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration's records, Dwyer, Hughes and Jennifer Dwyer Dent are the designated producers and Dwyer was an original owner of Chevy Chase Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on

¹ Dwyer is the registered agent of ProfitCenters, LLC in the records of the Maryland Department of Assessments and Taxation and is believed to be an owner with Hughes.

June 6, 2010.²

8. Heritage Title was issued a license to act as a resident producer firm on February 3, 1999, and is authorized to act as a producer firm until its license expires on June 30, 2011. According to the Administration's records, Dwyer, Hughes and Richard C. Turner are the designated producers and Dwyer was an original owner of Heritage Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
9. Home Towne Title was issued a license to act as a resident producer firm on August 15, 2006, and is authorized to act as a producer firm until its license expires on August 14, 2012. According to the Administration's records, Dwyer, Hughes and Richard C. Turner are the designated producers and Dwyer was an original owner of Home Towne Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
10. Kare Title was issued a license to act as a resident producer firm on December 7, 2004, and is authorized to act as a producer firm until its license expires on December 6, 2012. According to the Administration's records, Dwyer is the designated producer and Dwyer was an original owner of Kare Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
11. Merit Title was issued a license to act as a resident producer firm on March 29,

² In Conditional Approval No. 912, August 2009, the Comptroller of the Currency, Administrator of National Banks, approved the conversion of Chevy Chase Bank, FSB to a national bank and the merger with Capital One, NA. The Comptroller noted that the subsidiaries

2005, and is authorized to act as a producer firm until its license expires on March 28, 2011. According to the Administration's records, Dwyer is the designated producer and Dwyer was an original owner of Merit Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.

12. Optimum Title was issued a license to act as a resident producer firm on December 7, 2004, and is authorized to act as a producer firm until its license expires on December 6, 2012. According to the Administration's records, Dwyer is the designated producer and Dwyer was an original owner of Optimum Title. Dwyer notified the Administration that he transferred his fifty percent (50%) ownership interest to ProfitCenters, LLC on June 6, 2010.
13. Provident Title was issued a license to act as a resident producer firm on March 29, 2005, and is authorized to act as a producer firm until its license expires on March 28, 2011. According to the Administration's records, Dwyer is the designated producer and Dwyer retains a twenty five percent (25%) ownership interest in Provident Title. Dwyer notified the Administration on June 6, 2010 that ProfitCenters had a fifty percent (50%) ownership interest in the company.
14. Standard Title was issued a license to act as a resident producer firm on February 2, 2004, and is authorized to act as a producer firm until its license expires on February 19, 2012. According to the Administration's records, Dwyer is the designated producer and Dwyer retains a twenty five percent (25%) ownership interest in Standard Title. Dwyer notified the Administration on June 6, 2010 that

of Chevy Chase Bank will transfer to the new bank; one being Chevy Chase Title Services, LLC, which was a 50% owned joint venture with ProfitCenters, LLC.

ProfitCenters had a fifty percent (50%) ownership interest in the company.

15. Concurrent with the issuance of this Summary Suspension Order, the Commissioner has issued an Order revoking the licenses of Dwyer, Hughes, Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Home Town Title, Kare Title, Merit Title, Optimum Title, Provident Title and Standard Title to act as an insurance producers in the State of Maryland (“Revocation Order”). A copy of the Revocation Order is attached hereto, and incorporated in its entirety by reference herein, as **Exhibit 1**.
16. Dwyer, Hughes, and/or the respective LLCs have violated Insurance § 10-121(b) and § 10-126(a)(1), (4), (6), (12), and (13) making them subjecting to disciplinary action under the Insurance Article.
17. Dwyer, Hughes, Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Home Town Title, Kare Title, Merit Title, Optimum Title, Provident Title and Standard Title continue to hold Maryland Insurance Producer Licenses.
18. Section 10-226(c)(2) of the State Government Article provides that a unit “may order summarily the suspension of a license” if it “finds that the public health, safety, or welfare imperatively requires emergency action.” In light of the facts set forth in MIA Order Nos. **MIA-2011-01-028, MIA-2011-01-029, MIA-2011-01-030, MIA-2011-01-031, MIA-2011-01-032, MIA-2011-01-033, MIA-2011-01-034, MIA-2011-01-035, MIA-2011-01-036, MIA-2011-01-037, MIA-2011-01-038, MIA-2011-01-039, MIA-2011-01-040, and MIA-2011-01-041**. The Commissioner hereby finds that emergency action is required as Dwyer, Hughes,

and/or the LLCs pose a grave threat to the welfare of the public.

19. By virtue of this suspension, Dwyer, Hughes, Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Home Town Title, Kare Title, Merit Title, Optimum Title, Provident Title and Standard Title are hereby prohibited from soliciting, selling, negotiating title insurance contracts or otherwise taking any action for which a Title Insurance Producer license is required under Maryland Law. **THIS SUSPENSION IS EFFECTIVE JANUARY 28, 2011.**
20. In accordance with State Government § 10-226(c)(2)(ii), a public hearing will be held on this summary suspension on February 9, 2011 at 9:30 a.m at the Maryland Insurance Administration, 200 St. Paul Place, Baltimore, MD 21202. At that hearing, Dwyer and Hughes may contest the summary suspension of the licenses. Dwyer and Hughes will have the opportunity to be represented by counsel, and will be afforded those applicable rights set forth in the Administrative Procedure Act, State Government § 10-201, *et seq.* and pertinent regulations including COMAR 31.02.01.04, *et seq.*
21. Should Dwyer or Hughes fail to appear for the hearing on February 9, 2011, they will be considered to have waived their rights to contest the summary suspension of their licenses.
22. Unless modified by the Commissioner after the February 9, 2011 hearing, this Order suspends the licenses of Dwyer, Hughes, Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Home Town Title, Kare Title, Merit Title, Optimum Title, Provident Title and Standard Title until

such time as this Order becomes a final, non-appealable order, or until this Order is modified or revoked after a hearing or is reversed by a court of competent jurisdiction.

23. This Summary Suspension Order will not be stayed prior to the hearing on February 9, 2011.
24. This Summary Suspension Order does not preclude the Administration from taking other administrative, civil, or criminal action for violations of the Insurance Article against Dwyer, Hughes, Beltway Title, Advantage Title, Benefit Title, Century Title, Chevy Chase Title, Heritage Title, Home Town Title, Kare Title, Merit Title, Optimum Title, Provident Title and Standard Title which occurred prior to the date of this Order, nor does it preclude the Administration from taking administrative action based on any violation of this Order.

ACCORDINGLY, for the reasons set forth above, effective this 28th day of January, 2011, it is hereby **ORDERED** that License RPI 41982 issued to John Joseph Dwyer, License RPI 63601 issued to Joseph Craig Huges, License RPF 4398 issued to Beltway Title, License RPF 99921148 issued to Advantage Title, RPF 109965 issued to Benefit Title, License RPF 4845 issued to Century Title, License RPF 115073 issued to Chevy Chase Title, License RPF 121252 issued to Heritage Title, License RPF 99958203

issued to Home Towne Title, License RPF 99921129 issued to Kare Title, License RPF 99928518 issued to Merit Title, License RPF 99921147 issued to Optimum Title, License RPF 99928516, and License RPF 99906762 are hereby **SUMMARILY SUSPENDED.**

ELIZABETH SAMMIS
ACTING INSURANCE COMMISSIONER

on file with original

By: _____

NANCY GRODIN
Associate Commissioner
Compliance & Enforcement