

STATE OF NEW JERSEY  
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

\_\_\_\_\_)  
 Proceedings by the Commissioner )  
 of Banking and Insurance, State )  
 of New Jersey, to fine, )  
 suspend, and/or revoke the )  
 insurance producer licenses of )  
 David G. Pierce, Reference No. )  
 9613751, Land One Settlement )  
 Services, LLC, Reference No. )  
 0234449, and Links Abstract )  
 Group, LLC, Reference No. )  
 1377537 )  
 \_\_\_\_\_)

FINAL ORDER

TO: David G. Pierce  
6 Oriole Lane  
Branchburg, NJ 08876

David G. Pierce  
1539 Athens Ave. SW  
Atlanta, GA 30310-4701

Land One Settlement Services, LLC  
726 Route 202 South  
Bridgewater, NJ 07980

Links Abstract Group, LLC  
6 Oriole Lane  
Branchburg, NJ 08876

THIS MATTER, having been opened by Richard J. Badolato, Commissioner, New Jersey Department of Banking and Insurance ("Commissioner"), upon information that David G. Pierce ("Pierce"), Land One Settlement Services, LLC ("Land One"), and

Links Abstract Group, LLC ("Links Abstract") (collectively, the "Respondents"), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Respondent Pierce was a licensed resident insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32, until his license expired on or about December 31, 2013; and

WHEREAS, Respondent Land One was a licensed resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32, until its license expired on or about May 31, 2013; and

WHEREAS, Respondent Links Abstract was a licensed resident business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32, until its license expired on or about May 31, 2014; and

WHEREAS, Respondent Pierce was the Designated Responsible Licensed Producer and responsible for the activities of Respondent Land One, and responsible for Land One's compliance with the insurance laws, pursuant to N.J.S.A. 17:22A-32b(2); and

WHEREAS, Respondent Pierce was the Designated Responsible Licensed Producer and responsible for the activities of Respondent Links Abstract, and responsible for Links Abstract's compliance with the insurance laws, pursuant to N.J.S.A. 17:22A-32b(2); and

WHEREAS, New Jersey Title Insurance Company is a title insurance company organized in the State of New Jersey and licensed to conduct the business of title insurance; and

WHEREAS, the Respondents are subject to the provisions of the New Jersey Insurance Producer Licensing Act of 2001, N.J.S.A. 17:22A-26, et seq. ("Producer Act"), the Title Insurance Act of 1974, N.J.S.A. 17:46B-1 et seq., the Producer Licensing regulations, N.J.A.C. 11:17-1 et seq., and the regulations governing Insurance Producer Standards of Conduct, N.J.A.C. 11:17A-1.1 et seq., N.J.A.C. 11:17C-1.1 et seq. and N.J.A.C. 11:17D-1.1 et seq.; and

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

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(4), an insurance producer shall not improperly withhold, misappropriate or convert any monies or properties received in the course of doing insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(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-40a(9), an insurance producer shall not have his insurance producer license, or its equivalent, denied, suspended or revoked in any other state, province, district or territory; and

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

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(18), an insurance producer shall not fail to notify the Commissioner within 30 days of his conviction of any crime, indictment or the filing of any criminal charges, or the suspension or revocation of any insurance license or authority by a state, other than this State, or the initiation of formal disciplinary proceedings in a state, other than this State, affecting the producer's insurance license or failing to obtain the written consent pursuant to sections 1033 and 1034 of Title 18, United States Code (18 U.S.C. ss. 1033 and 1034); or failing to supply any documentation that the Commissioner may request in connection therewith; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40c, the insurance producer license of a business entity may be suspended, revoked or refused if the Commissioner finds, after hearing, that an individual licensee's violation was known or should have been known by one or more of the partners, officers or managers acting on behalf of the business entity and the violation was

neither reported to the Commissioner nor corrective action taken; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40d, the Commissioner shall retain the authority to enforce the provisions of and to impose any penalty or remedy authorized by the Producer 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 the Producer 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.S.A. 17:22A-47a, 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. 17:46B-10.1a, every title insurance producer licensed pursuant to the Producer Act and every title insurance company shall maintain a separate record of all receipts and disbursements as a depository for funds representing closing or settlement proceeds of a real estate transaction, which funds shall be deposited in a separate trust or escrow account, and which shall not be commingled with a

producer's or company's own funds or with funds held by a producer or company in any other capacity; and

WHEREAS, pursuant to N.J.A.C. 11:17A-1.6(c), licensed partners, officers and directors, and all owners with an ownership interest of 10 percent or more in the organization shall be held responsible for all insurance related conduct of the organization licensee, any of its branch offices, its other licensed officers or partners, and its employees; and

WHEREAS, pursuant to N.J.A.C. 11:17A-4.6, where an insurance producer prepares a policy of title insurance, the policy must be delivered to the insured or applicant within 30 days following receipt by the insurance producer of necessary proofs showing a satisfactory disposition of all requirements or customary exceptions to title; and

WHEREAS, pursuant to N.J.A.C. 11:17A-4.8, an insurance producer shall reply in writing to any inquiry of the Department relative to the business of insurance within the time requested in said inquiry, or no later than 15 calendar days from the date the inquiry was made or mailed in cases where no response time is given; and

WHEREAS, pursuant to N.J.A.C. 11:17A-4.10, an insurance producer acts in a fiduciary capacity in the conduct of his or her insurance business; and

WHEREAS, pursuant to N.J.A.C. 11:17C-2.1(a), all premium

funds shall be held by an insurance producer in a fiduciary capacity and shall not be misappropriated, improperly converted to the insurance producer's own use, or illegally withheld by the licensee; and

WHEREAS, pursuant to N.J.A.C. 11:17C-2.2(c), all title insurance settlement funds shall be disbursed within five business days after settlement except as determined by the parties at settlement; and

WHEREAS, pursuant to N.J.A.C. 11:17-2.8(f)1 and 2, all licensees shall provide the Department with a complete and current business mailing address, and, if different, a street or location address, phone number and, if applicable, an email address; individual licensees shall also provide the Department with a complete and current residence address, phone number and, if applicable, an email address, and all licensees are required to notify the Department of any change in the foregoing information within 30 days of a change; and

WHEREAS, pursuant to N.J.A.C. 11:17-2.8(f)3, any legal process issued pursuant to the statutory authority of the Commissioner including, but not limited to, subpoenas, orders and orders to show cause may be served by sending the documents to the business mailing or residence address of the licensee then on file with the Department; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.1(a)1, before an administrative penalty is imposed, the Department shall direct a notice by certified mail or personal delivery to the last known business or mailing address of the alleged violator, which notice shall include a reference to the statute, rule and/or administrative order alleged to be violated, a concise statement of the facts alleged to constitute the violation, a statement of the administrative penalty or penalties sought to be imposed, and a statement advising the alleged violator of the right to a hearing and the procedure for requesting a hearing; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.1(a)2, the notice may describe more than one violation; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.1(a)3, the notice of alleged violations shall be served by personal delivery, or by certified mail to the alleged violator's last known business or mailing address, according to the files maintained by the Department, and service in this manner shall be considered lawful service on the alleged violator; and

WHEREAS, the Commissioner issued Order to Show Cause No. E16-81 on August 31, 2016 alleging violations of New Jersey insurance laws by Respondents as set forth in the following Counts:



COUNT 1  
(Pierce, Land One and Links Abstract)

IT APPEARING that at all relevant times Respondents were acting as a title insurance agency; and

IT FURTHER APPEARING that Pierce and Land One were granted non-resident title insurance producer licenses by the State of Maryland effective May 6, 2008 (Pierce) and October 17, 2007 (Land One), and that one of the conditions for granting the licenses was that Pierce and Land One maintain and enforce a \$100,000 surety bond for Maryland; and

IT FURTHER APPEARING that on or about October 27, 2008, the Hanover Insurance Company notified the State of Maryland that the surety bond of Pierce and Land One would be canceled effective November 25, 2008; and

IT FURTHER APPEARING that Maryland made numerous attempts to contact Pierce and Land One concerning the bond between December 3, 2008 and May 14, 2009, but Pierce and Land One failed to respond and cooperate; and

IT FURTHER APPEARING that as a result, the State of Maryland revoked the non-resident licenses of Pierce and Land One effective March 23, 2010; and

IT FURTHER APPEARING that subsequent to the revocation by the State of Maryland, Pierce and Land One did not notify the Department and, when they renewed their New Jersey license on August 1, 2011 (Land One) and on February 7, 2012 (Pierce), Pierce and Land One answered "NO" to Question No. 2 as to whether there was an administrative proceeding regarding any professional or occupational license; and

IT FURTHER APPEARING that on or about May 5, 2012, Links Abstract submitted an application for a title insurance producer license listing Pierce as a Designated Responsible Licensed Producer (DRLP), and that Pierce and Links Abstract answered Question No. 2 (has any owner, partner, officer, director, or manager ever been named in an administrative proceeding regarding any professional or occupational license) with a "NO", when Pierce and Links Abstract knew that Pierce's Maryland license had been revoked; and

IT FURTHER APPEARING that Respondents' failure to notify the Department of an administrative action by another state constitutes violations of N.J.S.A. 17:22A-40a (2), (8), (9) and (18) and N.J.S.A. 17:22A-47a; and

**COUNT 2**  
**(Pierce and Land One)**

IT APPEARING that at all relevant times Respondents were acting as a title insurance agency; and

IT FURTHER APPEARING that Land One was granted a non-resident title insurance producer license by the State of Florida, and that one of the conditions for granting the license was that Land One pay an administrative surcharge on or before January 30 of each calendar year; and

IT FURTHER APPEARING that a January 1, 2009 written notice was issued, and an Administrative Complaint was filed, by the State of Florida alleging that Land One failed to pay the administrative surcharge; and

IT FURTHER APPEARING that the State of Florida served the Administrative Complaint on Land One by publication, but Land One failed to answer the Administrative Complaint; and

IT FURTHER APPEARING that as a result, the State of Florida suspended the non-resident license of Land One by Order filed on December 14, 2009; and

IT FURTHER APPEARING that subsequent to the suspension by the State of Florida, Pierce and Land One did not notify the Department and, when they renewed their New Jersey license on August 1, 2011 (Land One) and on February 7, 2012 (Pierce), Pierce and Land One answered "NO" to Question No. 2 as to whether there was an administrative proceeding regarding any professional or occupational license; and

IT FURTHER APPEARING that the failure of Pierce and Land One to notify the Department of an administrative action by another state constitutes violations of N.J.S.A. 17:22A-40a (2), (8), (9) and (18) and N.J.S.A. 17:22A-47a; and

COUNT 3  
(Pierce and Land One)

IT FURTHER APPEARING that on or about September 29, 2008, Pierce signed an Agency Agreement with New Jersey Title Insurance Company ("NJTIC"), as the Managing Member of Land One, for Land One to act as company agent, and that the Agency Agreement permitted Land One to: solicit, negotiate, and effect title insurance, issue title insurance commitments, closing letters and title policies, and where required, to remit insurance premiums and title closing letter fees to NJTIC no later than the 15<sup>th</sup> day of each month (subsequent to the receipt of the money due the company); and

IT FURTHER APPEARING that Land One as agent for NJTIC issued the following title commitments but, subsequent to the listed property closing dates, failed to remit premiums/closing letter fees as follows:

<u>Nos.</u>	<u>Closing Dates</u>	<u>Amount Due</u>
LOT-NJ-11-3243	5/25/2011	\$144.40
LOT-NJ-11-3199	3/28/2011	\$140.95
LOT-NJ-10-2734	6/4/2010	\$494.45
And		

IT FURTHER APPEARING that Pierce and Land One, while agent of New Jersey Title Insurance Company, improperly withheld, misappropriated and converted funds belonging to insureds, received in the course of conducting insurance business, which constitutes fraudulent and dishonest practices and demonstrates incompetence, untrustworthiness and financial irresponsibility in the conduct of insurance business, in violation of N.J.S.A. 17:22A-40a(2), (4), (8) and (16), N.J.S.A. 17:46B-10.1a, N.J.A.C. 11:17A-4.10, N.J.A.C. 11:17C-2.1(a) and N.J.A.C. 11:17C-2.2(c); and

COUNT 4  
(Pierce and Land One)

IT FURTHER APPEARING that Land One issued the following title commitments and, subsequent to the listed property closing dates, failed to issue a title policy:

<u>Nos.</u>	<u>Closing Dates</u>
LOT-NJ-08-1933	Unknown

LOT-NJ-08-2062	Unknown
LOT-NJ-09-1714	Unknown
LOT-NJ-09-1765	Unknown
LOT-NJ-09-1766	Unknown
LOT-NJ-09-1767	Unknown
LOT-NJ-09-2112	Unknown
LOT-NJ-09-2207	Unknown
LOT-NJ-09-2409	Unknown
LOT-NJ-09-2410	Unknown
LOT-NJ-09-2532	Unknown
LOT-NJ-09-2534	Unknown
LOT-NJ-10-2734	6/4/2010
LOT-NJ-10-2820	6/15/2010
LOT-NJ-10-3027	Unknown
LOT-NJ-10-3089	Unknown
LOT-NJ-10-3112	1/5/2011
LOT-NJ-10-3118	2/17/2010
LOT-NJ-10-3121	Unknown
LOT-NJ-10-3123	Unknown
LOT-NJ-10-3153	1/21/2011
LOT-NJ-10-3167	Unknown
LOT-NY-10-2692	Unknown
LOT-NJ-11-3199	3/28/2011
LOT-NJ-11-3243	5/25/2011
And	

IT FURTHER APPEARING that where Land One, while agent of New Jersey Title Insurance Company, issued title commitments, but failed to issue title policies subsequent to property closing, constitutes violations of N.J.S.A. 17:22A-40a(2), (8), and N.J.A.C. 11:17A-4.6; and

**COUNT 5**  
**(Pierce and Land One)**

IT FURTHER APPEARING that where Respondents Pierce and Land One failed to abide by the terms and duties of the Agency Agreement with New Jersey Title Insurance Company when they failed to remit premiums as agreed, failed to hold these funds in a fiduciary capacity, and issued title commitments, but failed to issue title policies subsequent to property closing, constitutes violations of N.J.S.A. 17:22A-42a and N.J.S.A. 17:22A-40a(2), (4), (8) (16) and N.J.A.C. 11:17A-4.10; and

COUNT 6  
(Pierce and Land One)

IT FURTHER APPEARING that the Department sent a letter by certified and regular mail, dated July 2, 2013, addressed to Land One's business address as listed in the Department records, 726 Route 202 South, Suite 320-329, Bridgewater, NJ 07950, and that the letter inquired as to Land One's license, record retention, title commitments, unissued title policies, and the State of Maryland revocation; and

IT FURTHER APPEARING that the Post Office returned both July 2, 2013 letters to Land One as "Undeliverable, Unable to Forward"; and

IT FURTHER APPEARING that the Department then sent a second letter by certified and regular mail, dated July 17, 2013, addressed to Pierce at his home address as listed in the Department records, 26 Oriole Lane, Branchburg, NJ 08876, and that the letter made reference to, and enclosed a copy of, the Department's letter to Land One of July 2, 2013, and also requested a response by July 31, 2013; and

IT FURTHER APPEARING that the Post Office confirmed delivery of the certified letter dated July 17, 2013 by returning the green card receipt signed by Pierce; and

IT FURTHER APPEARING that Pierce and Land One did not respond as requested in the July 17, 2013 letter; and

IT FURTHER APPEARING that the Department issued Subpoena No. 13-03 on August 16, 2013 and sent it by certified and regular mail to Pierce at his home address, and that the Subpoena commanded that Pierce appear at the Department on August 29, 2013 at 11:00 a.m., and bring with him certain title, accounting and bank records; and

IT FURTHER APPEARING that the Post Office returned the certified mail to Pierce as "Unclaimed", and that the regular mail was not returned as undeliverable; and

IT FURTHER APPEARING that Pierce did not appear at the Department pursuant to the Subpoena or communicate a request for an adjournment; and

IT FURTHER APPEARING that on September 3, 2013, the Subpoena and a cover letter were again sent by certified and regular mail to Pierce's home address, with an adjourned date of September 17, 2013 at 11:00 a.m., the Post Office returned the certified mail as "Unclaimed", and that the regular mail was not returned as undeliverable; and

IT FURTHER APPEARING that Pierce did not respond to the September 3, 2013 Subpoena and letter; and

IT FURTHER APPEARING that these instances where Pierce and Land One failed to reply in writing, to a letter of inquiry of the Department relative to the business of insurance within the time requested in said inquiry, or no later than 15 calendar days from the date inquiry was made or mailed in cases where no response time was given, and failed to appear or respond pursuant to the Subpoena, constitutes violations of N.J.S.A. 17:22A-40a(2) and (8) and N.J.A.C. 11:17A-4.8; and

IT FURTHER APPEARING that as set forth in the Certification of Service of Jeffrey S. Posta, Deputy Attorney General, attached hereto as Exhibit "A", Respondents were given notice of the aforesaid charges and an opportunity to contest the charges at a hearing pursuant to the Order to Show Cause, which was duly served by certified and regular mail to the last known business or mailing address of Respondents, according to the files maintained by the Department, in accordance with N.J.A.C. 11:17D-2.1(a)3; and

IT FURTHER APPEARING that although due notice of the charges provided an opportunity to oppose the allegations, Respondents failed to provide written responses to the charges contained in Order to Show Cause within 20 days as provided by

N.J.A.C. 11:17D-2.1(d), and therefore Respondents have waived their right to a hearing to contest these charges and the charges are deemed admitted, pursuant to N.J.A.C. 11:17D-2.1(b)1;

NOW, THEREFORE, IT IS on this 10<sup>TH</sup> day of MARCH, 2017

ORDERED that the charges contained in Counts 1-6 of Order to Show Cause No. E16-81 are deemed admitted by Respondents, pursuant to N.J.A.C. 11:17D-2.1(b)1; and

IT IS FURTHER ORDERED that pursuant to N.J.S.A. 17:22A-40, and N.J.A.C. 11:17D-2.1(b)2, the insurance producer licenses of Respondents are hereby **REVOKED** effective upon the execution of this Final Order; and

IT IS FURTHER ORDERED that pursuant to N.J.S.A. 17:22A-45c, Respondents shall each be separately and individually responsible for the payment to the Commissioner of civil penalties, consisting of a separate civil penalty for each of the six violations as stated in in Order to Show Cause No. E16-81, as follows:

Count 1: Respondents Pierce, Land One and Links Abstract shall be jointly and severally responsible for the payment of civil penalties totaling \$1,000.00 for failing to notify the Department of an administrative action by the State of Maryland; and

Count 2: Further, Respondents Pierce and Land One shall be jointly and severally responsible for the payment of civil penalties totaling \$1,000.00 for failing to notify the Department of an administrative action by the State of Florida; and

Count 3: Further, Respondents Pierce and Land One shall be jointly and severally responsible for the payment of civil penalties totaling \$10,000.00 for improperly withholding, misappropriating and converting funds belonging to insureds; and

Count 4: Further, Respondents Pierce and Land One shall be jointly and severally responsible for the payment of civil penalties totaling \$10,000.00 for failing to issue title policies; and

Count 5: Further, Respondents Pierce and Land One shall be jointly and severally responsible for the payment of civil penalties totaling \$10,000.00 for failing to remit premiums, failing to hold funds in a fiduciary capacity, and failing to issue title policies; and

Count 6: Further, Respondent Pierce and Land One shall be jointly and severally responsible for the payment of civil penalties totaling \$1,000.00 for failing to appear and comply with the Department's subpoena; and

IT IS FURTHER ORDERED that pursuant to N.J.S.A. 17:22A-45c, Respondents Pierce and Land One shall pay restitution to New



Jersey Title Insurance Company in the amount of \$779.80 as described in Count 3 of Order to Show Cause No. E16-81; and

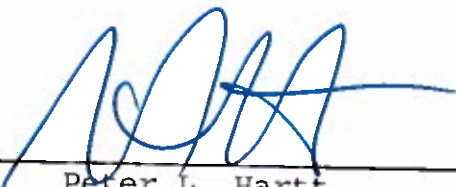
IT IS FURTHER ORDERED that Respondents shall pay the above fines in full by remitting payment to the Commissioner of Banking and Insurance, State of New Jersey, 20 West State Street, P.O. Box 329, Trenton, New Jersey 08625, Attention: Virgil Downtin, Chief of Investigations, by certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury," within ten (10) days from the date of service of this Order; and

IT IS FURTHER ORDERED that in the event full payment of the fines and restitution is not made, the Commissioner may exercise any and all remedies available by law, including but not limited to recovery of any unpaid penalties, in accordance with the Penalty Enforcement Law, N.J.S.A. 2A:58-10 et seq.; and

IT IS FURTHER ORDERED that the fines in this Final Order are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and the protection of the public health, safety and welfare, and are not intended to constitute debts that may be limited or discharged in a bankruptcy proceeding; and

IT IS FURTHER ORDERED that the provisions of this Final Order represent a final agency decision and constitute a final resolution of the allegations contained in Order to Show Cause

No. E16-81 as to Respondents, David G. Pierce, Land One  
Settlement Services, LLC, and Links Abstract Group, LLC.



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Peter L. Hartt  
Director of Insurance

EXHIBIT A

STATE OF NEW JERSEY  
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

\_\_\_\_\_  
Proceedings by the Commissioner )  
of Banking and Insurance, State )  
of New Jersey, to fine, )  
suspend, and/or revoke the )  
insurance producer licenses of )  
David G. Pierce, Reference No. )  
9613751, Land One Settlement )  
Services, LLC, Reference No. )  
0234449, and Links Abstract )  
Group, LLC, Reference No. )  
1377537. )  
\_\_\_\_\_

**CERTIFICATION OF  
DEPUTY ATTORNEY GENERAL  
JEFFREY S. POSTA**

I, Jeffrey S. Posta, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am a Deputy Attorney General assigned as counsel for the Commissioner of Banking and Insurance, State of New Jersey, ("Commissioner"), in the above-captioned matter. I make this Certification in support of entry of the Final Order in the above-captioned case against Respondents, David G. Pierce ("Pierce"), Land One Settlement Services, LLC ("Land One"), and Links Abstract Group, LLC ("Links Abstract") (collectively, "Respondents").

2. On August 31, 2016, the Commissioner issued

Order to Show Cause No. E16-81 against Respondents, charging them with violations of the insurance laws of this State, pursuant to N.J.S.A. 17:22A-40.

3. Pursuant to N.J.A.C. 11:17D-2.1(a)3, the Order to Show Cause "shall be served by personal delivery, or by certified mail to the alleged violator's last known business or mailing address, according to the files maintained by the Department. Service in this manner shall be considered lawful service on the alleged violator."

4. Under cover letter dated September 1, 2016, our office served Pierce, Land One, and Links Abstract with Order to Show Cause No. E16-81 at Respondents' last known business address and mailing address on file with the New Jersey Department of Banking and Insurance.

5. Specifically, the cover letter and Order to Show Cause were sent via certified mail, return receipt requested, and regular mail, to the business address and mailing address of Respondents on file with the New Jersey Department of Banking and Insurance as follows:

David G. Pierce  
6 Oriole Lane  
Branchburg, NJ 08876

Land One Settlement Services, LLC  
726 Route 202 South  
Bridgewater, NJ 07980

Links Abstract Group, LLC  
6 Oriole Lane  
Branchburg, NJ 08876

6. A LexisNexis Accurint search was also conducted on Pierce using his social security number, which showed a current address of 1539 Athens Ave. SW, Atlanta, GA 30310-4701. The cover letter and Order to Show Cause dated September 1, 2016 were sent to Pierce via certified mail, return receipt requested, and regular mail, at this address.

7. The certified mailings to each of the addresses of Respondents on file with the New Jersey Department of Banking and Insurance were returned.

8. The regular mailing to Pierce at 1539 Athens Ave. SW, Atlanta, GA 30310-4701, was not returned.

9. The regular mailings to each of the addresses of Respondents on file with the New Jersey Department of Banking and Insurance were returned.

10. A true and exact copy of the returned certified mailings and the returned regular mailings are attached as Exhibits 1 and 2, respectively.

11. In sum, pursuant to N.J.S.A. 11:17D-2.1(a)3, service of the Order to Show Cause as described above constitutes lawful service upon Respondents.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

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Jeffrey S. Posta  
Deputy Attorney General

Dated: March 2, 2017