

# WFG Underwriting Bulletin



To: All WFG Maryland Policy Issuing Agents; All WFG Title Examiners and Officers  
From: Maryland Underwriting Department  
Date: April 12, 2024  
Bulletin No. MD 2024-02  
Subject: ABC Capital Investments LLC; Castle Title – Transaction Reminders

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## **ABC Capital and Castle Title:**

Effective immediately, any transactions for the purchase, sale, or refinance of properties in which ABC Capital Investments, LLC, ABC Capital Baltimore, LLC, or similarly-named companies are in the chain of title **must be pre-approved by WFG's Maryland Underwriter**. These transactions primarily, but not exclusively, occurred in Baltimore City and Baltimore County from 2017-2023, and may have involved Castle Title, a now-defunct title agency.

For these transactions, pay special attention to the following considerations:

### **1. FinCEN Targeting Order:**

WFG agents are reminded of FinCEN reporting requirements as set forth in the FinCEN Targeting Order and WFG Bulletin set forth below;

a. [Click here to view WFG Bulletin FinCEN 2023-01.](#)

Note: The form in this Bulletin should be filled out and sent to WFG after closing.

b. [Click here for the FinCEN Geographic Targeting Order.](#)

Note: This document describes Maryland transactions for which reporting is required.

### **2. Certificates of Occupancy and Work Permits:**

WFG agents are reminded that they must require certificates of occupancy from investors for properties where the property was improved by the seller prior to sale.

If you have any questions about this Bulletin, please contact your WFG Maryland Underwriter, Ned Livornese, for assistance at [nlivornese@wfgtitle.com](mailto:nlivornese@wfgtitle.com), or call 443-286-5964.

**NOTE: The information contained in this Bulletin is intended solely for the use of employees of WFG National Title Insurance Company, its title insurance agents and approved attorneys. Disclosure to any other person is expressly prohibited unless approved in writing by the WFG National Title Insurance Company's Underwriting Department.**

**The Agent may be held responsible for any loss sustained as a result of the failure to follow the standards set forth above.**