FILED
JUN 16 2025
INSURANCE REGULATION
Docketed by:

OFFICE OF INSURANCE REGULATION

MICHAEL YAWORSKY
COMMISSIONER

IN THE MATTER OF:

AMERICAN DREAM AUTO PROTECT, INC.

_____/

Index: OIR 2025-71

CASE NO.: 401058-25

CEASE AND DESIST COMPLAINT

TO: AMERICAN DREAM AUTO PROTECT, INC.
c/o Corporation Service Company
Princeton South Corporate Center, Suite 160
100 Charles Ewing Blvd.
Ewing, NJ 08628

AMERICAN DREAM AUTO PROTECT, INC.
c/o Moshe "Henry" Qubrusi
300 McGraw Drive, 2nd Floor
Edison, NJ 08837

YOU ARE HEREBY NOTIFIED that pursuant to the Florida Insurance Code, including, but not limited to, sections 634.031, 634.284, and 634.285, Florida Statutes, the STATE OF FLORIDA OFFICE OF INSURANCE REGULATION ("the OFFICE") has caused an investigation to be made of the activities of AMERICAN DREAM AUTO PROTECT, INC. ("AMERICAN DREAM AUTO") with respect to its motor vehicle service agreement activities. Pursuant to sections 634.031 and 634.285, the OFFICE issues this Complaint alleging that AMERICAN DREAM AUTO was engaged in the unauthorized and unlicensed business of transacting and/or issuing motor vehicle service agreements in Florida. As grounds therefore, the OFFICE alleges that:

Jurisdiction

1. Section 20.121(3)(a)l., Florida Statutes, provides, in part, that the OFFICE shall be responsible for all activities concerning insurers and other risk bearing entities, including licensing, rates, policy forms, market conduct, and claims.

2. Section 624.01, Florida Statutes, provides that chapters 624-632, 634, 635, 636, 641, 648, and 651 constitute the "Florida Insurance Code."

3. The OFFICE has jurisdiction over the subject matter hereof and parties herein pursuant to sections 634.031, 634.284, and 634.285.

Findings of Fact

4. AMERICAN DREAM AUTO'S principal place of business is located at 300 McGraw Drive, 2nd Floor, Edison, NJ 08837. It is not a registered corporation in Florida.

5. Moshe "Henry" Qubrusi is the sole owner of AMERICAN DREAM AUTO.

6. AMERICAN DREAM AUTO is not licensed as a motor vehicle service agreement company in the State of Florida.

7. AMERICAN DREAM AUTO is not an authorized insurer in Florida.

8. From June 21, 2022, through August 28, 2024, AMERICAN DREAM AUTO entered into motor vehicle service agreements with residents of Florida without a license or authorization.

9. As of August 28, 2024, AMERICAN DREAM AUTO had 894 in-force contracts in Florida.

10. As of August 28, 2024, AMERICAN DREAM AUTO reported having $2,231,614 in active written premiums.

11. AMERICAN DREAM AUTO has ceased marketing in Florida and has not applied for licensure in Florida.

Conclusions of Law

12. Section 634.031(1) states a person may not transact, administer, or market, or in any manner hold itself out as transacting, administering, or marketing the service agreement business, on behalf of herself or himself or itself, in Florida or from Florida unless it is authorized to do so under a subsisting license issued to it by the OFFICE.

13. Section 634.285 provides, in part, that if it is determined that the person charged has engaged in the unlawful transaction of service agreement business, the OFFICE shall issue an order requiring the violator to cease and desist from engaging in the unlawful transaction of service agreement business.

14. AMERICAN DREAM AUTO has transacted, administered, marketed and/or issued motor vehicle service agreements to the residents of Florida without a license in violation of section 634.031(1).

15. AMERICAN DREAM AUTO'S activities do not fall within the exceptions, exclusions or exemptions provided in section 634.031 or any other provision of the Florida Statutes or federal law.

Proposed Agency Action

16. Notice is hereby provided that the OFFICE will enter a Final Cease and Desist Order in this matter, subject only to the Notice of Rights herein. In its Final Cease and Desist Order, the OFFICE shall order AMERICAN DREAM AUTO to cease and desist acting as a motor vehicle service agreement company in the State of Florida without a license or certificate of authority.

17. AMERICAN DREAM AUTO shall honor all current and future obligations and liabilities arising from its contracts in Florida and will pay all obligations and liabilities that have arisen or may arise from its operations in Florida. If any court or administrative action, arbitration, mediation, or other judicial or quasi-judicial action listing AMERICAN DREAM AUTO as a party is filed in Florida, AMERICAN DREAM AUTO shall provide written notice to the OFFICE within 30 days of the filing of said action.

WHEREFORE, because AMERICAN DREAM AUTO has violated the Florida Insurance Code by operating as an unlicensed motor vehicle service agreement company in Florida, in violation of section 634.031(1), the OFFICE intends to issue a Final Order requiring the following:

A. AMERICAN DREAM AUTO is ordered, pursuant to section 634.285, to cease and desist from engaging in the unlawful transaction of issuing or contracting to issue motor vehicle service agreements in Florida without a license.

B. To minimize disruption to Florida consumers, AMERICAN DREAM AUTO is ordered to run-off its 894 existing in-force motor vehicle service agreements in Florida.

C. AMERICAN DREAM AUTO shall provide the OFFICE with quarterly reports of all motor vehicle service agreements remaining in-force until all motor vehicle service agreements have lapsed or have been cancelled or until the expiration of the period listed in the contract. Each report shall contain the parties to the contract. The first report will be due thirty days following the issuance of the Final Order. Thereafter, AMERICAN DREAM AUTO will provide quarterly reports.

D. AMERICAN DREAM AUTO is responsible for administering and servicing existing in-force motor vehicle service agreement contracts in compliance with chapter 634, Florida Statutes.

DONE and ORDERED this 16 day of JUNE, 2025.

MICHAEL YAWORSKY
Commissioner
Office of Insurance Regulation

NOTICE OF RIGHTS

Pursuant to sections 120.569 and 120.57, Florida Statutes and Rule chapter 28-106, Florida Administrative Code (F.A.C.), you may have a right to request a proceeding to contest this action by the Office of Insurance Regulation (hereinafter the "Office"). You may request a proceeding by filing a Petition. Your Petition for a proceeding must be in writing and must be filed with the General Counsel acting as the Agency Clerk, Office of Insurance Regulation. If served by U.S. Mail the Petition should be addressed to the Florida Office of Insurance Regulation at 612 Larson Building, Tallahassee, Florida 32399-4206. If Express Mail or hand-delivery is utilized, the Petition should be delivered to 612 Larson Building, 200 East Gaines Street, Tallahassee, Florida 32399-0300. The written Petition must be received by and filed with the Office no later than 5:00 p.m. on the twenty-first (21) day after your receipt of this notice. Unless your Petition challenging this action is received by the Office within twenty-one (21) days from the date of the receipt of this notice, the right to a proceeding shall be deemed waived. Mailing the response on the twenty-first day will not preserve your right to a hearing.

If a proceeding is requested and there is no dispute of material fact the provisions of section 120.57(2), Florida Statutes may apply. In this regard you may submit oral or written evidence in opposition to the action taken by this agency or a written statement challenging the grounds upon which the agency has relied. While a hearing is normally not required in the absence of a dispute of fact, if you feel that a hearing is necessary one may be conducted in Tallahassee, Florida or by telephonic conference call upon your request.

If you dispute material facts which are the basis for this agency's action you may request a formal adversarial proceeding pursuant to sections 120.569 and 120.57(1), Florida Statutes. If you request this type of proceeding, the request must comply with all of the requirements of Rule chapter 28-106.2015, F.A.C., including but not limited to:

a) A statement requesting an administrative hearing identifying those material facts that are in dispute. If there are none, the petition must so state; and

b) A statement of when the respondent received notice of the agency's action.

These proceedings are held before a State Administrative Law Judge of the Division of Administrative Hearings. Unless the majority of witnesses are located elsewhere, the Office will request that the hearing be conducted in Tallahassee.

In some instances, you may have additional statutory rights than the ones described herein.

Failure to follow the procedure outlined with regard to your response to this notice may result in the request being denied. Any request for administrative proceeding received prior to the date of this notice shall be deemed abandoned unless timely renewed in compliance with the guidelines as set out above.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Cease and Desist Complaint has been sent by U.S. Certified Mail this 17 day of June, 2025, to: American Dream Auto Protect, Inc., c/o Corporation Service Company, Princeton South Corporate Center, Suite 160, 100 Charles Ewing Blvd., Ewing, NJ, 08628; and c/o Moshe "Henry" Qubrusi, 300 McGraw Drive, 2nd Floor, Edison, NJ 08837.

William Oglo

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