



an insurance company or producer for the purpose of obtaining an insurance policy knowing that the statement contained false or misleading information concerning any fact or thing material to an insurance application or contract; and

IT IS FURTHER STIPULATED AND AGREED that Defendant admits that the above conduct constitutes a violation of the Fraud Act, and that any future violation of the Fraud Act shall be considered a second offense; and

IT IS FURTHER STIPULATED AND AGREED that Defendant shall pay a sum of \$2,500.00 ("Settlement Amount") to the Commissioner, which consists of a civil penalty in the amount of \$1,500.00 in accordance with N.J.S.A. 17:33A-5b, a \$75.00 surcharge in accordance with N.J.S.A. 17:33A-5.1, and \$925.00 in attorneys' fees and costs in accordance with N.J.S.A. 17:33A-5b, to be paid upon execution of this Stipulation of Settlement:

IT IS FURTHER STIPULATED AND AGREED that Defendant shall remit payment of the Settlement Amount, in full, by certified check, bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance." This Stipulation of Settlement and payment of the Settlement Amount shall be returned to:

Gordon A. Queenan, DAG  
Banking and Insurance Section  
25 Market Street, P.O. Box 117

Trenton, NJ 08625


IT IS FURTHER STIPULATED AND AGREED that this Stipulation of Settlement may be used against Defendant in any civil or administrative proceeding related to a violation of the Fraud Act, including a professional license suspension or revocation proceeding; and

IT IS FURTHER STIPULATED AND AGREED that pursuant to N.J.S.A. 17:33A-10c, a copy of this Stipulation of Settlement shall be provided to any appropriate professional licensing authority; and


IT IS FURTHER STIPULATED AND AGREED that the penalties of this Stipulation of Settlement are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and protection of the public health, safety and welfare, and are not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding.


JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff

Dated: 12/13/15

By:   
Gordon A. Queenan  
Deputy Attorney General

HANLON DUNN ROBERTSON SCHWARTZ & WEBB  
Attorneys for Defendant

By:   
Robert Schwartz, Esq.

Dated: 

By: \_\_\_\_\_  
Defendant

Dated: