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Richard J. Hughes Justice Complex
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SUPERIOR COURT OF NEW JERSEY
SPECIAL CIVIL PART - OCEAN COUNTY
DOCKET NO. OCN-DC-8915-16

RICHARD J. BADOLATO,)
COMMISSIONER OF THE NEW)
JERSEY DEPARTMENT OF BANKING)
AND INSURANCE,)

Civil Action

STIPULATION OF SETTLEMENT

Plaintiff,)

v.)

HELENA RICHARDSON,)

Defendant.)
)

WHEREAS Richard J. Badolato, the Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner") and Defendant, Helena Richardson, have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement; and

. IT IS HEREBY STIPULATED AND AGREED that, on December 3, 2010, January 20, 2011 and July 6, 2011, Defendant Helena Richardson failed to disclose the actual operator of a 2004 Toyota Solara to New Jersey Citizens United Reciprocal Exchange Insurance Company, in violation of the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. ("Fraud Act"); and

IT IS FURTHER HEREBY STIPULATED AND AGREED that this conduct constitutes a violation of the Fraud Act, and any future violation of the Fraud Act shall be considered a subsequent violation; and

IT IS FURTHER HEREBY STIPULATED AND AGREED that Defendant Helena Richardson shall pay a total sum of \$2,475.00 ("Settlement Amount") to the Commissioner of the New Jersey Department of Banking and Insurance. This amount consists of civil penalties in the amount of \$1,500.00 pursuant to N.J.S.A. 17:33A-5b, a statutory insurance fraud surcharge of \$75.00 pursuant to N.J.S.A. 17:33A-5.1, and attorney's fees of \$900 pursuant to N.J.S.A. 17:33A-5b to be satisfied upon the following terms and conditions:

1. Immediately upon execution of this Stipulation of Settlement, Defendant Helena Richardson shall remit to the attorney for the Commissioner a payment in the amount of \$2,475.00 by certified check, official bank check, or money order

made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to

Anita Bittner, Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street, 2nd Floor West Wing
P.O. Box 117
Trenton, New Jersey 08625

2. Pursuant to N.J.S.A. 17:33A-10c, a copy of this Stipulation of Settlement shall be provided to any appropriate licensing authority; and

3. In the event full payment of the Settlement Amount is not made, the Commissioner may exercise any and all remedies available by law, including, but not limited to, recovery of any unpaid penalties pursuant to the Penalty Enforcement Law, N.J.S.A. 2A:58-10, et seq.; and

IT IS FURTHER HEREBY 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.

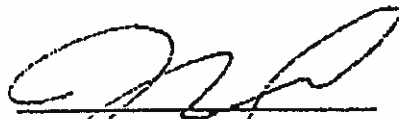
CONSENTED AS TO FORM, CONTENT, AND ENTRY:

Dated: 9/4/17


Helena Richardson, Defendant

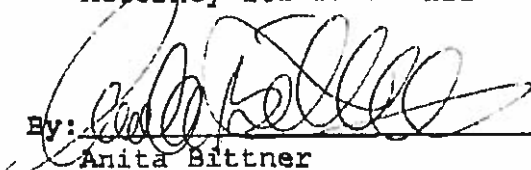
LAW OFFICES OF JEFF HENNINGER, ESQ.
Attorney for Defendant

Dated: 9/4/17


Joseph Compitello, Esquire

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 4/5/18

By: 
Anita Bittner
Deputy Attorney General