

MATTHEW J. PLATKIN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Richard J. Hughes Justice Complex
P.O. Box 117
Trenton, New Jersey 08625
Attorney for Plaintiff

By: Telge N. Peiris
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION- CAMDEN COUNTY
DOCKET NO.: CAM-L-001565-20

MARLENE CARIDE,
COMMISSIONER OF THE NEW :
JERSEY DEPARTMENT OF :
BANKING & INSURANCE, :
:
Plaintiff, :
:
v. :
:
CANDACE T. MOORE-ABENY, :
AND ANDREW A. MOORE :
:
Defendant. :
:

Civil Action

STIPULATION OF SETTLEMENT

WHEREAS, Plaintiff, Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff"), initiated the instant Complaint assessing civil penalties pursuant to the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30 ("Fraud Act"), against Defendants, Candace T. Moore-Abney ("Defendant Moore-Abney") and Andrew A. Moore ("Defendant Moore") ("Defendants"), (collectively "Parties");

WHEREAS, for good cause shown, the Parties have reached an agreement resolving the issues in controversy, and consent to the entry of the within Stipulation of Settlement ("Stipulation") and stipulate and agree the terms and conditions set forth below.

1. Defendant Moore-Abney and Defendant Moore each admit that they violated N.J.S.A. 17:33-4(a)(1) as pleaded in the Complaint; and

2. Defendant Moore-Abney and Defendant Moore each agree that they shall not engage in any future violations of the Fraud Act;

3. Defendants shall pay Plaintiff a total amount of \$6,900.00 ("Settlement Amount") which consists of \$2,500.00 in civil penalties, assessed jointly and severally, pursuant to N.J.S.A. 17:33A-5(b); \$4,150.00 in attorney fees, assessed jointly and severally, pursuant to N.J.S.A. 17:33A-5(b); and \$125.00 in statutory surcharge assessed against each Defendant pursuant to N.J.S.A. 17:33A-5.1.

4. Defendants shall pay the Settlement Amount upon the following terms and conditions:

a. Immediately upon execution of this Stipulation by Defendants, Defendants shall remit to the attorney for the Plaintiff a lump sum payment in the amount of \$420.00 by certified check, official bank check, or money order made payable to the

"Commissioner, New Jersey Department of Banking and Insurance" and sent to:

Telge N. Peiris, Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, New Jersey 08625

b. On that date which is 30 days after the execution of this Stipulation by all parties, and on the same date for the twenty-five (36) months thereafter, Defendants shall remit the remaining balance of \$6,480 in thirty six (36) installment payments of \$180.00 each, until the full Settlement Amount has been paid in full, by certified check, official bank check, or money order, made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

Rose V. McGill
Collections Department
Department of Banking and Insurance
20 West State Street, 10th Floor
P.O. Box 325
Trenton, New Jersey 08625

5. In conjunction with the execution of this Stipulation, the Parties shall also enter into a Judgment by Consent for the Settlement Amount of \$6,900.00.

6. This Stipulation shall be governed by the laws of the State of New Jersey without regard to any conflict-of-laws principles. The Parties agree that the exclusive jurisdiction and venue for any dispute arising between and among the Parties under

the Stipulation will be the Superior Court of the State of New Jersey.

7. All communications from any party concerning the subject matter of this Stipulation shall be addressed as follows:

If to the Commissioner: Telge N. Peiris, Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, New Jersey 08625

If to Defendants: Andrew A. Moore and Candace T. Moore-
Abney
61 Presidential Drive,
Sicklerville, New Jersey 08081

With a copy to: Peter J. Bonfiglio, IV, Esq.
Ward, Shindle & Hall
196 Grove Avenue, Suite A
West Deptford, New Jersey 08086
(Counsel for Defendants)

8. This Stipulation may be executed in counterparts, each of which constitutes an original and all of which constitute one and the same agreement.

9. Pursuant to N.J.S.A. 17:33A-10(c), a copy of this Stipulation shall be provided to any appropriate licensing authority.

10. The penalties included in this Stipulation 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.

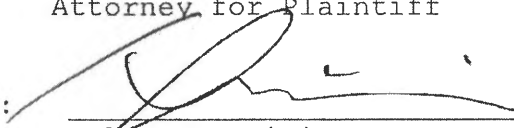
11. This Stipulation is effective on the date of signature of the last signatory. Facsimiles of signatures shall constitute acceptable, binding signatures for purposes of this Stipulation.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

MATTHEW J. PLATKIN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

March 10, 2022

By:



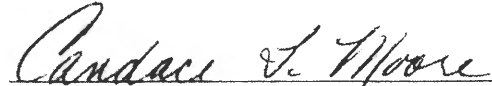
Telge N. Peiris
Deputy Attorney General

Dated: February 23, 2022



Andrew A. Moore

Dated: February 23, 2022



Candace T. Moore-Abney

Dated: February ____, 2022



Peter J. Bonfiglio IV, Esq.
Ward, Shindle & Hall
196 Grove Avenue, Suite A
West Deptford, New Jersey 08086

Dated: February 23, 2022