

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner of the New Jersey Department of Banking and Insurance, to fine, suspend and/or revoke the insurance producer licenses of Susan Caines, Reference No. 9951173; Vincent Scaturro, Reference No. 0076095; and Luigi Sacco, Reference No. 9610396) **FINAL ORDER**
) **AS TO**
) **SUSAN CAINES**
) **ONLY**

TO: Susan Caines
70 S. Burnett Street, Apt. 3D
East Orange, NJ 07018

This matter, having been opened by the Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), State of New Jersey, upon information that Susan Caines ("Caines"), may have violated various provisions of the insurance laws of the State of New Jersey, and

WHEREAS, Caines was licensed as a resident insurance producer pursuant to N.J.S.A 17:22A-32 before her license was suspended on June 16, 2014 pursuant to Order E14-69 of the Commissioner in connection with a larger conspiracy involving inactive insurance producers, Luigi Saco ("Saco") and Vincent Scaturro ("Scaturro"); and

WHEREAS, Caines is subject to the provisions of the New Jersey Insurance Producer Licensing Act of 2001 ("Producer Act"), N.J.S.A. 17:22A-26, et seq.; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a, the Commissioner may place on probation, suspend, revoke or refuse to issue or renew an insurance producer's license or may levy a civil penalty in accordance with N.J.S.A. 17:22A-45c, or may take any combination of actions, for any one or more of the violations listed in N.J.S.A. 17:22A-40a(1) through (19); and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(1), an insurance producer shall not provide incorrect, misleading, incomplete or materially untrue information in the license application; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(2), an insurance producer shall not violate any insurance laws, regulations, subpoenas or orders of the Commissioner or of another state's insurance regulator; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(3), an insurance producer shall not obtain or attempt to obtain a license through misrepresentation or fraud; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(4), an insurance producer shall not improperly withhold, misappropriate or convert any monies or properties received in the course of

doing insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(6), an insurance producer shall not be convicted of a felony or crime of the fourth degree or higher; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(7), an insurance producer shall not commit an insurance unfair trade practice or fraud; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(8), an insurance producer shall not use fraudulent, coercive or dishonest business practices, or demonstrate incompetence, untrustworthiness or financial irresponsibility in the conduct of insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(10), an insurance producer shall not forge another's name to an application for insurance or to any document related to an insurance transaction; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(15), an insurance producer shall not intentionally withhold material information or make a material misstatement in an application for a license; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(16), an insurance producer shall not commit any fraudulent act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(17), an insurance producer shall not knowingly facilitate or assist another person in violating any insurance laws; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(18), an insurance producer shall not fail to notify the Commissioner within 30 days of his conviction of any crime, indictment or the filing of any formal criminal charges, or the suspension or revocation of any insurance license or authority by a state, other than this State, or the initiation of formal disciplinary proceedings in a state, other than this State, affecting the producer's insurance license; or fail to obtain the written consent pursuant to 18 U.S.C. 1033 and 18 U.S.C. 1034; or fail to supply any documentation that the Commissioner may request in connection therewith; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40d, the Commissioner shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by this act and Title 17 of Revised Statutes or Title 17B of the New Jersey Statutes against any person who is under investigation for or charged with a violation of this act or Title 17 of the Revised Statutes or Title 17B of the New Jersey Statutes even if the person's license or registration has been surrendered or has lapsed by operation of law; and

WHEREAS, pursuant to N.J.S.A. 17:22A-45c, any person who violates any provision of this act shall be liable to a penalty not exceeding \$5,000 for the first offense and not exceeding \$10,000 for each subsequent offense; additionally, the court may order restitution of moneys owed any person and reimbursement of the costs of investigation and prosecution; and

WHEREAS, pursuant to N.J.S.A. 17:22A-47b, an insurance producer shall report to the Commissioner any criminal prosecution of the producer taken in any jurisdiction within 30 days of the initial pretrial hearing date. The report shall include a copy of the initial complaint filed, the order resulting from the hearing and any other relevant legal documents; and

WHEREAS, pursuant to N.J.A.C. 11:17A-4.10, an insurance producer acts in a fiduciary capacity in the conduct of his or her insurance business; and

WHEREAS, pursuant to 18 U.S.C. § 1033 and N.J.A.C. 11:17E, no person who has been convicted of a felony involving dishonesty or breach of trust shall engage in the business of insurance without the written consent of the Commissioner or his designee; and

WHEREAS, N.J.A.C. 11:17E-1.2 defines "felony" to mean any crime identified as an offense of the first, second, third

or fourth degree pursuant to N.J.S.A. 2C:1-4 and 43-1; and

WHEREAS, pursuant to the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. ("IFPA"), the Commissioner of the New Jersey Department of Banking and Insurance is authorized to institute suit for civil penalties and other relief against any person who violates the provisions of the IFPA. N.J.S.A. 17:33A-5; and

WHEREAS, pursuant to N.J.S.A. 17:33A-4a(1), a person who presents or causes to be presented any written or oral statement as part of, or in support of or opposition to, a claim for payment or other benefit pursuant to an insurance policy knowing that the statement contains any false or misleading information concerning any fact or thing material to the claim violates the IFPA; and

WHEREAS, pursuant to N.J.S.A. 17:33A-4a(2), a person who prepares or makes any written or oral statement that is intended to be presented to any insurance company, the Unsatisfied Claim and Judgment Fund or any claimant thereof in connection with, or in support of or opposition to any claim for payment or other benefit pursuant to an insurance policy or the "Unsatisfied Claim and Judgment Fund Law," knowing that the statement contains any false or misleading information concerning any fact or thing material to the claim violates the

IFPA; and

WHEREAS, pursuant to N.J.S.A. 17:33A-4a(3), a person who conceals or knowingly fails to disclose the occurrence of an event which affects any person's initial or continued right or entitlement to (a) any insurance benefit or payment or (b) the amount of any benefit or payment violates the IFPA; and

WHEREAS, pursuant to N.J.S.A. 17:33A-4b, a person violates the IFPA if he knowingly assists, conspires with, or urges any person or practitioner to violate any of the provisions of the IFPA; and

WHEREAS, pursuant to N.J.S.A. 17:33A-4c, a person violates the IFPA if, due to the assistance, conspiracy or urging of any person or practitioner, he knowingly benefits, directly or indirectly, from the proceeds derived from a violation of this act; and

WHEREAS, pursuant to N.J.S.A. 17:33A-5b, violations of the IFPA subject the violator to a civil penalty not to exceed \$5,000 for the first offense, not to exceed \$10,000 for the second offense, and not to exceed \$15,000 for each subsequent offense, and the court shall also award court costs and reasonable attorney fees; and

WHEREAS, pursuant to N.J.S.A. 17:33A-5.1, in addition to any other penalty, fine or charge imposed pursuant to law, a

person who is found in any legal proceeding to have committed insurance fraud shall be subject to a surcharge in the amount of \$1,000; and

IT APPEARING THAT, Caines, Scaturro, and Sacco worked for Monumental Life Insurance Company ("Monumental") as licensed producers; and

IT FURTHER APPEARING THAT, Caines worked with Sacco and Scaturro (collectively "Coconspirators") in Monumental's Union Office, district number "6-J," in a group designated "Staff 8"; and

IT FURTHER APPEARING THAT, Sacco served as "Sales Manager" for Staff 8; and

IT FURTHER APPEARING THAT, Coconspirators devised, conspired and carried out a scheme to fraudulently surrender numerous in force Monumental life insurance policies; and

IT FURTHER APPEARING THAT, the scheme involved the completion and submission to Monumental of falsified Disbursement Request Forms ("DRFs") designed to appear as though they had been completed and submitted by actual policyholders; and

IT FURTHER APPEARING THAT, on the falsified DRFs, Coconspirators would provide false addresses where the cash surrender checks from Monumental could be collected by the

Coconspirators without the policyholders' knowledge; and

IT FURTHER APPEARING THAT, after receiving the cash surrender checks, Coconspirators would forge the policyholders' signatures and endorse the cash surrender checks to 1) themselves, 2) Monumental, 3) or to a third party organization involved in the scheme, namely, the "Helping Hands and Ears Crisis Intervention and Prevention Center" ("Helping Hands"), through which the majority of the cash surrender checks were laundered; and

IT FURTHER APPEARING THAT, using this scheme, Coconspirators succeeded in fraudulently surrendering one hundred and twenty-five (125) Monumental life insurance policies, totaling \$62,330.51 in cash value; and

IT FURTHER APPEARING THAT, at least ninety-six (96) of the 125 cash surrender checks, totaling \$45,604.03 in cash value, were endorsed by Coconspirators to Helping Hands and then deposited by the administrator of Helping Hands, into a bank account held and operated by the Helping Hands organization; and

IT FURTHER APPEARING THAT, after the cash surrender checks deposited into the Helping Hands bank account cleared, Helping Hands would issue checks to Sacco and Scaturro from the Helping Hands bank account in an amount equivalent to the amount deposited, less a nominal "donation" to the organization

("Helping Hands checks"); and

IT FURTHER APPEARING THAT, the Helping Hands administrator represented in a statement under oath to law enforcement officers that, at the instruction of Sacco, she issued a number of Helping Hands checks to Coconspirators wherein the "payee" section was left blank; and

IT FURTHER APPEARING THAT, nine (9) Helping Hands checks were endorsed to Caines, which were subsequently deposited into her personal account or cashed; and

IT FURTHER APPEARING THAT, Caines endorsed eighteen (18) fraudulently obtained cash surrender checks to herself, and subsequently deposited them into her personal account; and

WHEREAS, the Commissioner issued Order to Show Cause No. E14-57 on May 21, 2014 (hereinafter, "OTSC E14-57"), alleging violations of New Jersey insurance laws by Respondents, including Caines; and

WHEREAS, OTSC E14-57 makes the following allegations as to Caines:

COUNT 12

IT APPEARING THAT, Caines assisted and conspired with [Sacco and Scaturro] in carrying out the above-described scheme to fraudulently cash surrender Monumental life insurance policies, which involved, among other things, the completion and submission of fraudulent DRFs to Monumental and the

forging of policyholders' signatures on the resulting cash surrender checks, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10), (16), (17), N.J.A.C. 11:17A-4.10, N.J.S.A. 17:33A-4a(1)-(3), N.J.S.A. 17:33A-4b, and N.J.S.A. 17:33A-4c; and

COUNT 13

IT APPEARING THAT, in the course of carrying out the above scheme, Caines endorsed and forged a number of the cash surrender checks to Helping Hands, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10), (16), (17), and N.J.A.C. 11:17A-4.10; and

COUNT 14

IT APPEARING THAT, Caines cashed nine (9) Helping Hands checks, totaling \$15,008.58, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10), (16), and N.J.A.C. 11:17A-4.10; and

COUNT 15

IT APPEARING THAT, Caines forged policyholder signatures on eighteen (18) fraudulently obtained Monumental cash surrender checks, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10), (16), and N.J.A.C. 11:17A-4.10; and

COUNT 16

IT APPEARING THAT, Caines deposited the above-referenced eighteen (18) cash surrender checks directly into her personal account, totaling \$11,898.17, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10), (16), and N.J.A.C. 11:17A-4.10; and

COUNT 17

IT APPEARING THAT, on or about February 24, 2010, Caines was indicted for (1) one count of Conspiracy to Commit Insurance Fraud in the Second Degree; (2) one count of Insurance Fraud in the Second Degree; and (3) one count of Theft by Deception in the Third Degree; and

IT FURTHER APPEARING THAT, Caines did not notify the Commissioner of this indictment within 30 days, in violation of N.J.S.A. 17:22A-40a(18); and

COUNT 18

IT APPEARING THAT, on or about August 15, 2012, Caines pleaded guilty to one count of Theft by Deception in the Third Degree, in violation of N.J.S.A. 17:22A-40a(2), (6), (7) and (8); and

COUNT 19

IT APPEARING THAT, in an effort to renew her New Jersey insurance producer's license, Caines completed the producer license examination on February 17, 2010; and

IT FURTHER APPEARING THAT, Caines completed the application for reinstatement on May 22, 2010, after the February 24, 2010 indictment had been issued against her; and

IT FURTHER APPEARING THAT, when completing her May 22, 2010 application for reinstatement, Caines answered "No" to the question of whether she had ever been charged with committing a crime, even though she knew this to be untrue, in violation of N.J.S.A. 17:22A-40a(1), (2), (3), (15), and (16); and

COUNT 20

IT APPEARING THAT, Caines completed a renewal application for her New Jersey insurance producer's license on or about March 1, 2014; and

IT FURTHER APPEARING THAT, Caines completed the renewal application after pleading guilty to Theft by Deception in the Third Degree on or about August 15, 2012; and

IT FURTHER APPEARING THAT, when completing her March 1, 2014 renewal application, Caines answered "No" to the question of whether she had ever been convicted of a crime, even though she knew this to be untrue, in violation of N.J.S.A. 17:22A-40a(1), (2), (3), (15), and (16); and

COUNT 21

IT APPEARING THAT, Caines has continued to work as a licensed producer even after her conviction for Theft by Deception in the Third Degree, without having first obtained the written consent required by 18 U.S.C. 1033(e), in violation of N.J.S.A. 17:22A-40a(8), and (18); and

IT FURTHER APPEARING that as set forth in the Certification of Service of Carl M. Bornmann, Deputy Attorney General, attached hereto as Exhibit A, Respondent Caines was given notice of the aforesaid charges and an opportunity to contest the charges at a hearing pursuant to OTSC E14-57, which were duly served by certified and regular mail to the addresses listed in this Final Order in accordance with N.J.A.C. 11:17D-

2.1(a)3; and

IT FURTHER APPEARING that, although due notice of the charges contained in OTSC E14-57 provided an opportunity to oppose the allegations, Caines failed to provide a written response to the charges contained in OTSC No. E14-57 within 20 days as provided by N.J.A.C. 11:17D-2.1(d), and therefore, Caines waived her right to a hearing to contest these charges and the charges contained therein are deemed admitted pursuant to N.J.A.C. 11:17D-2.1(b);

NOW, THEREFORE, IT IS on this ^{1st} day of July, 2015:

ORDERED that the charges contained in OTSC E14-57 are deemed admitted by Caines pursuant to N.J.A.C. 11:17D-2.1(b); and

IT IS FURTHER ORDERED that, pursuant N.J.S.A. 17:22A-40, and N.J.A.C. 11:17D-2.1(b)(2), the suspended resident insurance producer license of Caines in hereby REVOKED effective upon the execution of this Final Order by the Commissioner; and

IT IS FURTHER ORDERED that, pursuant to N.J.S.A. 17:22A-45c, Caines shall pay civil penalties totaling \$50,000.00 to the Commissioner for the violations contained in the OTSC E14-57, which aggregate amount has been determined as follows:

- a. \$5,000.00 for the violations of the Producer Act and

- the Fraud Act described in Count 12 of OTSC E14-57 - assisting and conspiring with Saco and Scaturro to complete and submit fraudulent cash surrender forms to Monumental Life; and
- b. \$5,000.00 for the violations of the Producer Act described in Count 13 of OTSC E14-57 - endorsing and forging checks from Monumental Life to Healing Hands; and
- c. \$5,000.00 for the violations of the Producer Act described in Count 14 of OTSC E14-57 - cashing nine (9) Helping Hands checks from Monumental Life totaling \$15,008.58; and
- d. \$5,000.00 for the violations of the Producer Act described in Count 15 of OTSC E14-57 - forging policyholder signatures in eighteen (18) fraudulently obtained Monumental cash surrender checks; and
- e. \$5,000.00 for the violations of the Producer Act described in Count 16 of OTSC E14-57 - depositing the above-referenced eighteen (18) fraudulently obtained Monumental cash surrender checks into her personal bank account; and
- f. \$5,000.00 for the violations of the Producer Act described in Count 17 of OTSC E14-57 - failing to

- notify the Department of her Indictment; and
- g. \$5,000.00 for the violations of the Producer Act described in Count 18 of OTSC E14-57 - pleading guilty to Theft by Deception in the Third Degree; and
 - h. \$5,000.00 for the violations of the Producer Act described in Count 19 of OTSC E14-57 - answering "No" to the question of whether she had ever been charged with committing a crime, even though she knew this to be untrue, on her May 22, 2014 application for reinstatement of her producer's license; and
 - i. \$5,000.00 for the violations of the Producer Act described in Count 20 of OTSC E14-57 - answering "No" to the question of whether she had ever been convicted of a crime, even though she knew this to be un true, on her March 1, 2014 application for renewal of her producer's license; and
 - j. \$5,000.00 for the violations of the Producer Act described in Count 21 of OTSC E14-57 - continuing to work as a licensed producer even after her conviction for Theft by Deception in the Third Degree without first having obtained written consent required by 18 U.S.C. 1033(e) and N.J.A.C. 11:17E; and

IT IS FURTHER ORDERED that, pursuant to N.J.A.C. 11:1-32.4(b)20, Caines shall reimburse the Department of Banking and Insurance for the costs associated with the investigation of this matter, as evidenced by the Certification of Investigator Al Verdel, attached hereto as Exhibit B, totaling \$287.50; and

IT IS FURTHER ORDERED that, pursuant to N.J.S.A. 17:33A-5.1, Caines shall pay a surcharge in the amount of \$1,000.00 for violating the Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq.; and

IT IS FURTHER ORDERED that Caines shall pay the above fines and costs totaling \$51,287.50 in full by remitting payment to the Commissioner of Banking and Insurance, State of New Jersey, 20 West State Street, P.O. Box 329, Trenton, New Jersey 08625, Attention: Virgil Downtin, Chief of Investigations by certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury," within ten (10) days from the date of service of this Order; and

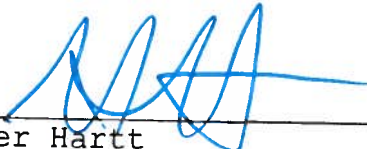
IT IS FURTHER ORDERED that Caines shall make restitution to Monumental in the total amount of \$26,906.75, consisting of the moneys obtained by Caines through her participation in the scheme to fraudulently surrender Monumental life insurance policies; and

IT IS FURTHER ORDERED that in the event full payment of the fines and costs are not made, the Commissioner may exercise any and all remedies available by law, including but not limited to recovery of any unpaid penalties, in accordance with The Penalty Enforcement Law, N.J.S.A. 2A:58-10 et seq.; and

IT IS FURTHER ORDERED that Monumental may execute on this Final Order to pursue collection of this restitution; and

IT IS FURTHER ORDERED that the fines in this Final Order are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and the 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; and

IT IS FURTHER ORDERED that the provisions of this Final Order represent a final agency decision and constitute a final resolution of the allegations contained in Order to Show Cause No. E14-57; and



Peter Hartt
Director of Insurance

EXHIBIT A

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner of Banking and)
Insurance, State of New Jersey, to fine,) CERTIFICATION OF
suspend and/or revoke the insurance producer) DEPUTY ATTORNEY
licenses of Susan Caines, Reference No.) GENERAL
9951173, Vincent Scaturro, Reference No.) CARL M. BORNMAN
0076095 and Luigi Sacco, Reference No.)
9610396.)

I, Carl M. Bornmann, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am a Deputy Attorney General assigned as counsel for the Commissioner of Banking and Insurance, State of New Jersey, ("the Commissioner"), in the above-captioned matter. I make this certification in support of entry of the Final Order in the above-captioned case against Respondent Susan Caines only.

2. On May 21, 2014, the Commissioner issued Order to Show Cause No. E14-57 against Respondent Susan Caines individually and as part of a larger conspiracy involving Respondents Luigi Sacco and Vincent Scaturro and charging them with violations of the insurance laws of this State pursuant N.J.S.A. 17:22A-40.

3. By letter dated May 23, 2014, our office served Respondent Caines with Order to Show Cause No. E14-57 at Respondent Caines' residential address. Specifically, the cover letter and Order to Show Cause were sent via certified mail, return receipt requested, and regular mail to Respondent Caines' residential address at 70 S. Burnett Street, Apartment 3D, East Orange, New Jersey 07018.

4. Respondent Caines was successfully served at 70 S. Burnett Street, Apartment 3D, East Orange, New Jersey 07018 as evidenced by the fact that the regular mail was not returned and the certified mailing was returned to our office as "unclaimed." A true and exact copy of the unclaimed mailing is attached as Exhibit 1.

5. Under cover letter dated June 16, 2014, our office served Respondent Caines with Order Suspending License, Order No. E14-69 at Respondent Caines' residential address. Specifically, the cover letter and Order were sent via overnight mail to Respondent Caines' residential address at 70 S. Burnett Street, Apartment 3D, East Orange, New Jersey 07018.

6. Respondent Caines was successfully served at 70 S. Burnett Street, Apartment 3D, East Orange, New Jersey 07018 as evidenced by the fact that the overnight mail was not returned. A true and exact copy of the overnight shipping proof of delivery is

attached as Exhibit 2.

7. By letter dated June 19, 2014, our office served Respondent Caines with a second letter stating that she was served with Order to Show Cause No. E14-57 on or about May 24, 2014 and to date no written request for a hearing had been received. The letter was served at Respondent Caines' residential address. Specifically, the letter was sent via certified mail, return receipt requested, and regular mail to Respondent Caines' residential address at 70 S. Burnett Street, Apartment 3D, East Orange, New Jersey 07018.

8. Respondent Caines' was successfully served with the June 19th letter at 70 S. Burnett Street, Apartment 3D, East Orange, New Jersey 07018 as evidenced by the fact that the regular mail was not returned and the certified mailing was returned to our office as "unclaimed." A true and exact copy of the unclaimed mailing is attached as Exhibit 3.

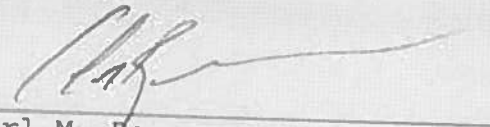
9. Pursuant to N.J.S.A. 11:17D-2.1(a)3, service of the Order to Show Cause in this manner constitutes lawful service upon Caines.

10. The successful service of the Order to Show Cause to Respondent Caines provided Respondent with an opportunity to contest the charges of Order to Show Cause No. E14-57 at a hearing, and provided that Respondent must file with the Commissioner an Answer to the charges of the Order to Show Cause,

including a Request for a Hearing, within twenty (20) days of service of the Order to Show Cause upon Respondents.

11. To date, Respondent Susan Caines has failed to provide sufficient written response to the charges contained in Order to Show Cause No. E14-57 within 20 days as provided by N.J.A.C. 11:17D-2.1(d).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Carl M. Hornmann
Deputy Attorney General

Dated: 6-22-15

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From Mrs. J. J. Hughes, NJ
DEPARTMENT OF LAW AND PUBLIC SAFETY
Richard J. Hughes Justice Complex
DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

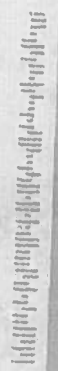
To:



- INSUFFICIENT ADDRESS
- ATTEMPTED NOT KNOWN
- NO SUCH NUMBER/STREET
- NOT DELIVERABLE AS ADDRESSED
- UNABLE TO FORWARD
- OTHER

RTS

UNCLAIMED



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Proof of Delivery

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Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:	1ZX864W02211328034
Service:	UPS NEXT DAY AIR
Delivered On:	06/17/2014 10:28 A.M.
Delivered To:	EAST ORANGE, NJ, US
Signed By:	CAINES
Left At:	Residential

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 12/22/2014 4:27 P.M. ET

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Shipping Document

See Instructions on back. Visit UPS.com or call 1-800-PICK-UPS® (800-742-5877) for additional information and UPS Tariff/Terms and Conditions.

1 TRACKING NUMBER 1Z X86 4W0 22 1132 8034

2 SHIP TO EN FROM

SHIP TO EN FROM
REFERENCE NUMBER
X864W0

3 NAME TELEPHONE
Tasim D. S. Barber, Esq. 609-292-9118

COMPANY
N.J. DIVISION OF LAW

STREET ADDRESS
26 MARKET ST FLR 1 RM W.WING

CITY AND STATE ZIP CODE
TRENTON NJ 08611-2148

4 NAME TELEPHONE

Susan Caines

COMPANY

STREET ADDRESS DEPT./FLR. Restricted Delivery

70 S. Burnett St Apt. 3D

CITY AND STATE (INCLUDE COUNTRY IF INTERNATIONAL) ZIP CODE
East Orange NJ 07018



WEIGHT	LIT <input checked="" type="checkbox"/>	PAK <input type="checkbox"/>	WEIGHT	DECLARED WEIGHT <small>if Applicable</small>	LARGE PACKAGE <input type="checkbox"/>	SHIPPER RELEASE <input type="checkbox"/>
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5 TYPE OF SERVICE	<input checked="" type="checkbox"/> NEXT DAY AIR	<input type="checkbox"/> EXPRESS (INT'L)	MARKS
FOR INTERNATIONAL SHIPMENTS	<input type="checkbox"/> CUSTOMS VALUE	<input type="checkbox"/> DOCUMENTS ONLY	\$

6 SATURDAY PICKUP <small>See Instructions</small>	<input type="checkbox"/>	SATURDAY DELIVERY <small>See Instructions</small>	<input type="checkbox"/>	\$
DECLARED VALUE FOR CARRIAGE <small>For declared value over \$100, see instructions.</small>	<input type="checkbox"/>	AMOUNT	\$	\$

C.O.D. <small>If C.O.D. items cannot be shipped, see instructions. UPS C.O.D. tag to package.</small>	<input type="checkbox"/>	AMOUNT	\$	\$
An Additional Handling Charge applies for certain items. See instructions.	<input type="checkbox"/>	\$	\$	\$

7 BILL TO SHIPPER'S ACCOUNT NUMBER <input checked="" type="checkbox"/>	BILL RECEIVER <input type="checkbox"/>	BILL THIRD PARTY <input type="checkbox"/>	CREDIT CARD <input type="checkbox"/>	AMERICAN EXPRESS, Discover, MasterCard, Visa	CHECK <input type="checkbox"/>
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8 RECEIVER'S/THIRD PARTY'S UPS ACCT. NO. OR MAJOR CREDIT CARD NO. EXPIRATION DATE

THIRD PARTY'S COMPANY NAME

STREET ADDRESS

CITY AND STATE ZIP CODE

9 SHIPPER'S SIGNATURE *Tasim D. S. Barber*

DATE OF SHIPMENT *6/16/18*

0101911202609 1/10 8 UPS COPY

00222

000883_P1

20042426

734 of 1500

STATE OF NEW JERSEY
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
P.O. BOX 112
TRENTON NJ 08625-0112

Jason N. Silberberg, DAG

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



7013 1710 0000 7829 7647



52.9

Susan Caines
70 S. Burnett Street, Apt. 3D
East Orange, NJ 07018

NIXIE 076 DE 1009 06

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

070 08625011212 10026

BC: 08625011212 *0451-05

EXHIBIT B

Proceedings by the Commissioner of)
Banking and Insurance, State of New)
Jersey, to fine, suspend and/or) **CERTIFICATION OF COSTS**
revoke the insurance producer) **BY INVESTIGATOR**
licenses of Susan Caines, Reference) **AL VERDEL**
No. 9951173; Vincent Scaturro,)
Reference No. 0076095; and Luigi)
Sacco, Reference No. 9610396.)

I, Al Verdel, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am an investigator with the New Jersey Department of Banking and Insurance, Division of Enforcement and Consumer Protection ("Department").

2. This certification is submitted in support of the Department's application for reimbursement of its costs of investigation and prosecution, in accordance with N.J.S.A. 17:22A-45(c).

3. On or about June 1, 2006, I was assigned responsibility for conducting an investigation to determine whether Susan Caines, Vincent Scaturro and Luigi Sacco, may have violated certain provisions of the New Jersey Producer Licensing Act of 2001, N.J.S.A. 17:22A-26, et seq., and related insurance regulations.

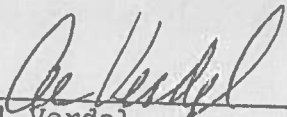
4. To determine the amount of time that I spent in the investigation and prosecution of this matter, I reviewed my files relative to this matter, including my time records. On the basis of this review, I have prepared the below schedule of costs:

DATE	TIME IN HRS.	PHONE	CASE PREP.	COMMENTS
11-29-10	3.00		X	Factual and Evidence Summary
2-1-12	.50		X	Letter to Union County Prosecutor's office
2-2-12	.25		X	Accurint lookup
2-2-12	.50		X	F&E revision
4-10-12	.50		X	F&E revision
6-30-14	1.00		X	Prep for Transmittal to Office of Administrative Law
TOTAL TIME	5.75 hrs	@ \$50.00 per hour		=TOTAL COSTS OF INVESTIGATION - \$287.50

5. As this schedule reflects, the investigative efforts expended by the Department of Insurance concerning this matter total 5 hours and 45 minutes. Pursuant to N.J.A.C. 11:1-32.4(b)(20), costs to the Department for the investigation and prosecution for violations of the New Jersey Insurance Producer Licensing Act, N.J.S.A. 17:22A-40, are reimbursable at the rate of \$50.00 per hour, rounded to the nearest quarter hour.

6. I therefore request that the Department's costs of investigation and prosecution be reimbursed in the amount of \$287.50.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.



Al Verdel

Dated: December 22, 2014.