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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CAMDEN COUNTY
DOCKET NO. CAM-L-1509-13

COMMISSIONER, NEW JERSEY)
DEPARTMENT OF BANKING AND)
INSURANCE,)

Civil Action

Plaintiff,)

STIPULATION OF SETTLEMENT

v.)

DONALD CLIFTON,)

Defendant.)

WHEREAS, the Plaintiff, Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), and Defendant, Donald Clifton ("Defendant"), have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement;

IT IS FURTHER HEREBY STIPULATED AND AGREED, that pursuant to N.J.S.A. 17:33A-5d of the Insurance Fraud Prevention

Act, N.J.S.A. 17:33A-1 etseq., that Defendant does not admit or deny the allegations in the Complaint; and

IT IS FURTHER HEREBY STIPULATED AND AGREED, that pursuant to N.J.S.A. 17:33A-5d this Stipulation of Settlement shall not be used in any subsequent civil or criminal proceeding; and

IT IS FURTHER HEREBY STIPULATED AND AGREED, that Defendant shall pay a total sum of \$1,512.50 (hereinafter "the Settlement Amount") to the Commissioner. The Settlement Amount shall be satisfied upon the following terms and conditions:

1. By October 1, 2015, Defendant shall remit to the attorney for the Commissioner a payment in the amount of \$512.50 by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

Richard E. Wegryn, Jr., Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, New Jersey 08625

2. Defendant shall remit the remaining balance of said Settlement Amount, \$1,000.00, in monthly installment payments of \$71.50, to be paid on or by the first day of each month, beginning November 1, 2015, with a final payment of \$70.50 due December 1, 2016, 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
New Jersey Department of Banking and Insurance
20 West State Street, 10th Floor
P.O. Box 325
Trenton, New Jersey 08625

3. In conjunction with the execution of this Stipulation of Settlement, the parties shall also enter into a Consent Judgment for the entire Settlement Amount; and

4. If Defendant Clifton fails to make any scheduled payment within five (5) days of its due date, the Commissioner can, upon notice to Defendant Clifton, declare the entire outstanding balance of the Settlement Amount to be immediately due and payable. Thereafter, the Commissioner may take any action available under the law of this State to collect the outstanding balance of the Settlement Amount, plus pre-judgment interest from the date herein, all attorneys' fees and costs incurred from the initiation of this action through judgment in addition to those fees specified herein, and any other remedies available under the law, including, but not limited to, recovery of any unpaid penalties pursuant to the Penalty Enforcement Law, N.J.S.A. 2A:58-10, etseq.; 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:

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY

Dated: 8/11/15

By: Richard E. Wegryn, Jr.
Richard E. Wegryn, Jr.
Deputy Attorney General

Dated: 8/5/15

By: Donald Clifton
Donald Clifton
Defendant

Dated: 8/5/15

By: Julius A. Hughes, Jr.
Julius Hughes, Jr., Esquire
Attorney for Defendant