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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - BERGEN COUNTY
DOCKET NO. BER-L-4210-15

RICHARD J. BADOLATO,
ACTING COMMISSIONER OF
THE NEW JERSEY DEPARTMENT
OF BANKING & INSURANCE,

Plaintiff,

v.

ANN M. SORRENTINO a/k/a
ANN M. PINET and
ALEXANDER PINET,

Defendants.

Civil Action

STIPULATION OF SETTLEMENT

WHEREAS Richard J. Badolato, Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), and Defendants Ann M. Sorrentino a/k/a Ann M. Pinet ("Sorrentino") and Alexander Pinet ("Pinet"), have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement; and

1. IT IS HEREBY STIPULATED AND AGREED, that Defendant Sorrentino admits that she violated the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. ("Fraud Act"), by: (a) calling Citizens United Reciprocal Exchange Auto Insurance ("CURE") on September 8, 2011, to request the addition of comprehensive collision coverage to her insured automobile and failing to disclose that the insured automobile had been involved in an accident earlier that same day; and (b) conspiring with Defendant Pinet to misrepresent the date of the September 8, 2011 motor vehicle accident in an insurance claim submitted to CURE in an attempt to falsely reflect that the accident occurred after the addition of comprehensive and collision coverage to the policy; and

2. IT IS FURTHER HEREBY STIPULATED AND AGREED, that Defendant Pinet admits that he violated the Fraud Act by: (a) filing a claim for loss with CURE wherein he misrepresented the date of a September 8, 2011 motor vehicle accident to falsely reflect that the accident occurred after the addition of adding comprehensive and collision coverage to the policy; and (b) conspiring with Defendant Sorrentino to add comprehensive and collision coverage to an insurance policy without disclosing the September 8, 2011 motor vehicle accident; and

3. IT IS FURTHER HEREBY STIPULATED AND AGREED, that Defendant Sorrentino's conduct constitutes two violations of the Fraud Act, and that any future violation of the Fraud Act shall be considered a subsequent violation; and

4. IT IS FURTHER HEREBY STIPULATED AND AGREED, that Defendant Pinet's conduct constitutes two violations of the Fraud Act, and that any future violation of the Fraud Act shall be considered a subsequent violation; and

5. IT IS FURTHER HEREBY STIPULATED AND AGREED, that Defendant Sorrentino shall pay to the Commissioner a total amount of \$2,134.95 consisting of \$1,500.00 in civil penalties for two violations of the Fraud Act pursuant to N.J.S.A. 17:33A-5b, \$75.00 constituting the statutory surcharge pursuant to N.J.S.A. 17:33A-5.1, \$500.00 in attorneys' fees pursuant to N.J.S.A. 17:33A-5b, and costs of service in the amount of \$59.95 pursuant to N.J.S.A. 17:33A-5b; and

6. IT IS FURTHER HEREBY STIPULATED AND AGREED, that Defendant Pinet shall pay to the Commissioner a total amount of \$2,090.00 consisting of \$1,500.00 in civil penalties for two violations of the Fraud Act pursuant to N.J.S.A. 17:33A-5b, \$75.00 constituting the statutory surcharge pursuant to N.J.S.A. 17:33A-5.1, \$500.00 in attorneys' fees pursuant to N.J.S.A.

17:33A-5b, and costs of service in the amount of \$15.00 pursuant to N.J.S.A. 17:33A-5b; and

7. IT IS FURTHER HEREBY STIPULATED AND AGREED, that all these payments are to be satisfied upon the following terms and conditions:

8. Upon execution of this Stipulation of Settlement, both Defendant Sorrentino and Defendant Pinet shall each remit to the attorney for the Commissioner a separate payment in the amount of \$500.00 each by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

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

9. Defendant Sorrentino shall remit the remaining balance of \$1,634.95 in monthly installment payments of at least \$100.00, and Defendant Pinet shall remit the remaining balance of \$1590.00 in monthly installment payments of at least \$100.00, to be paid on or by the first day of each month, beginning November 1, 2015, until the full settlement amounts have been paid, 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

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

11. 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

12. If Defendants fail to make any scheduled payment within ten days of its due date, the Commissioner can, upon notice to Defendants, declare the entire balance outstanding to be immediately due and payable. Thereafter, the Commissioner may take any action available under the law of this State to collect the amount outstanding at that time, including post-judgment interest from the date of the judgment, attorneys' fees, and any other remedies available under the law; and

13. 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 this Stipulation of Settlement can be used in any subsequent civil or criminal proceeding; 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.

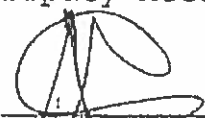
CONSENTED AS TO FORM, CONTENT, AND ENTRY:

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

By: 

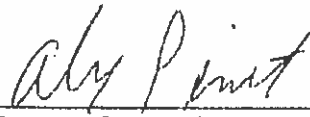
Ryan S. Schaffer
Deputy Attorney General

Dated: October 22, 2015



Ann M. Sorrentino, pro se
Defendant

Dated: Sept 24, 15



Alexander Pinet, pro se
Defendant

Dated: Sept 24, 15