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ALLSTATE NEW JERSEY INSURANCE	:	SUPERIOR COURT OF NEW JERSEY
COMPANY, et al.,	:	LAW DIVISION - UNION COUNTY
	:	DOCKET NO. UNN-L-4091-08
Plaintiffs,	:	
	:	
v.	:	
	:	
GREGORIO LAJARA, et al.,	:	<u>CIVIL ACTION</u>
	:	
Defendants.	:	<b>STIPULATION OF SETTLEMENT AS</b>
	:	<b>TO DEFENDANT LIBERTY</b>
	:	<b>SUPPLIES, LLC ONLY.</b>

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COMMISSIONER, NEW JERSEY	:	
DEPARTMENT OF BANKING & INSURANCE,	:	
	:	
Plaintiff-Intervenor,	:	
	:	
v.	:	
	:	
GREGORIO LAJARA, et al.,	:	
	:	
Defendants.	:	

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The claims in this action having been settled and resolved limited to the following parties: Plaintiff-Intervenor, Commissioner of the New Jersey Department of Banking & Insurance ("Commissioner") and Defendant Liberty Supplies, Inc. ("Liberty"):

WHEREAS, Defendant Liberty is a New Jersey Limited Liability Company and is a "person" as defined by N.J.S.A. 17:33A-3; and

WHEREAS, between 2002 and 2004 Defendant Liberty submitted at least 89 claims and billed approximately \$173,929.33 to Plaintiff Allstate; and

WHEREAS, between 2004 and 2007 Plaintiff Allstate paid approximately \$48,460.14 to Defendant Liberty for the claims submitted; and

WHEREAS, the Commissioner and Defendant Liberty have reached an amicable agreement resolving the allegations in controversy as raised in the Commissioner's January 6, 2012 Intervenor-Complaint ("Intervenor-Complaint") against Defendant Liberty, and have consented to the entry of the within Stipulation of Settlement; and

WHEREAS, pursuant to N.J.S.A. 17:33A-5d, Defendant Liberty admits to allegations as stated in the Intervenor-Complaint; and

WHEREAS, this conduct constitutes three violations of the New Jersey Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30; and

WHEREAS, Defendant Liberty consents to payment of a total of \$10,000.00 ("Settlement Payment"); and

IT IS FURTHER STIPULATED AND AGREED, that Defendant Liberty shall enter into a Consent Judgment for a sum of \$10,000.00 to the Commissioner of the New Jersey Department of Banking and Insurance, which consists of civil penalties in the amount of \$7,500.00, pursuant to N.J.S.A. 17:33A-5b; \$2,125.00 in attorneys' fees, pursuant to N.J.S.A. 17:33A-5b; and a \$375.00 statutory surcharge, pursuant to N.J.S.A. 17:33A-5.1; and

IT IS FURTHER STIPULATED AND AGREED that 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

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 if Defendant Liberty fails to make any payment, Plaintiff may, upon notice to Defendant, declare the entire balance outstanding to be immediately due and payable. Thereafter, Plaintiff may take any action available under the laws of this State to collect the


amount outstanding at that time, including post-judgment interest from the date of the judgment, attorneys' fees and other remedies available under the law; and

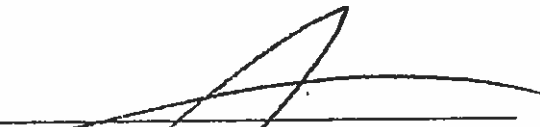
IT IS FURTHER STIPULATED AND AGREED that the penalties of this Stipulation of Settlement are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and protection of the public health, safety and welfare, and are not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding.

CONSENTED AS TO FORM, CONTENT AND ENTRY OF ORDER:

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff-Intervenor  
Commissioner of the New Jersey  
Department of Banking & Insurance

Dated: 1/13/2016

By:   
Kristina Cretella  
Deputy Attorney General

By:   
John G. Cito, Esq.  
Attorney for Defendant Liberty  
Supplies, LLC

Dated: 1/12/16