

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff
Richard J. Hughes Justice Complex
25 Market Street
P. O. Box 117
Trenton, New Jersey 08625

By: Carl M. Bornmann
Deputy Attorney General
(609)292-6123
NJ Attorney ID No. 001241992
carl.bornmann@dol.lps.state.nj.us

SUPERIOR COURT OF NEW JERSEY
SPECIAL CIVIL PART
ESSEX COUNTY
DOCKET NO. ESX-DC-010367-17

RICHARD J. BADOLATO,)
COMMISSIONER OF THE NEW)
JERSEY DEPARTMENT OF BANKING)
AND INSURANCE,)

Civil Action

Plaintiff,)
v.)

STIPULATION OF SETTLEMENT

BFD NO. 14-52463-35

TIMMY DOUGLAS,)
Defendant.)

WHEREAS Richard J. Badolato, the Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner") and Defendant, Timmy Douglas, have reached an amicable agreement

resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement; and

IT IS HEREBY STIPULATED AND AGREED that, on September 28, 2012, Defendant Timmy Douglas knowingly provided a materially false written statement by falsely stating that he resided and garaged his insured vehicle at 605 Port Reading Avenue, Port Reading, New Jersey, when in fact he resided and garaged his insured vehicle at 461 Fairview Avenue, Orange, New Jersey, on an automobile insurance policy application submitted to Cure Insurance Company, in violation of the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. ("the Fraud Act").

IT IS FURTHER HEREBY STIPULATED AND AGREED that this conduct constitutes a violation of the Fraud Act, and any future violation of the Fraud Act shall be considered a subsequent violation; and

IT IS FURTHER HEREBY STIPULATED AND AGREED that Defendant Timmy Douglas shall pay a total sum of \$2,075.00 ("Settlement Amount") to the Commissioner of the New Jersey Department of Banking and Insurance. This amount consists of civil penalties in the amount of \$1,500.00 pursuant to N.J.S.A. 17:33A-5b, attorneys' fees in the amount of \$500.00 pursuant to N.J.S.A. 17:33A-5b, and a statutory insurance fraud surcharge of

\$75.00 pursuant to N.J.S.A. 17:33A-5.1, to be satisfied upon the following terms and conditions:

1. Immediately upon execution of this Stipulation of Settlement, Defendant Timmy Douglas shall remit to the attorney for the Commissioner a payment in the amount of \$2,075.00 by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to

Carl M. Bornmann, Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street, 2nd Floor West Wing
P.O. Box 117
Trenton, New Jersey 08625

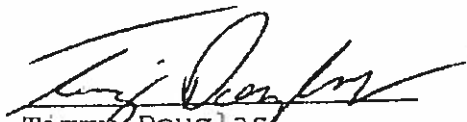
2. Pursuant to N.J.S.A. 17:33A-10c, a copy of this Stipulation of Settlement shall be provided to any appropriate licensing authority; and

3. 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, 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.

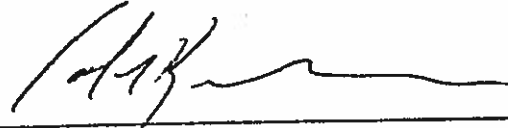
CONSENTED AS TO FORM, CONTENT, AND ENTRY:


Timmy Douglas
Defendant

Dated: 10-27-17

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 11-14-17

By: 
Carl M. Bornmann
Deputy Attorney General