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Attorney for Plaintiff

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MARLENE CARIDE, ACTING COMMISSIONER OF THE
NEW JERSEY DEPARTMENT OF BANKING AND
INSURANCE,

Plaintiff,

v.

ALEXANDER LYSENKO,

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY

DOCKET NO. MON-L-004080-17

CIVIL ACTION

STIPULATION OF SETTLEMENT

WHEREAS Plaintiff Marlene Caride, Acting Commissioner of the New Jersey Department of Banking & Insurance ("Commissioner"), and Defendant have reached an amicable agreement resolving the issues in controversy and consent to the entry of the within Stipulation of Settlement; and

WHEREAS the Commissioner filed a Complaint alleging that Defendant violated the Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1, et seq. ("IFPA");

WHEREAS IT IS STIPULATED AND AGREED that Defendant,

jointly and severally, shall pay the sum of \$ \$3500.00 ("Settlement Amount") to the New Jersey Department of Banking and Insurance, which consists of a civil penalty in the amount of \$3000.00 in accordance with N.J.S.A. 17:33A-5b, a \$125.00 surcharge in accordance with N.J.S.A. 17:33A-5.1, and attorney's fees in the amount of \$375.00 in accordance with N.J.S.A. 17:33A-5b.

IT IS FURTHER STIPULATED AND AGREED that Defendant shall pay the settlement in a lump sum amount as follows:

1. Upon execution of this Stipulation of Settlement, Defendant shall immediately pay \$3,500.00 by certified check, bank check or money order made payable to **"Commissioner, New Jersey Department of Banking and Insurance"** and send to:

Anna M. Lascurain DAG
R.J. Hughes Justice Complex
25 Market Street, 2nd Floor West
P.O. Box 117
Trenton, New Jersey 08625

2. If the Defendant fails to make the scheduled payment within ten (10) days of its due date, the Commissioner may, upon notice to Defendant declare the entire balance outstanding to be immediately due and payable. Thereafter, Commissioner may take any action available under the laws of this State to collect the amount

outstanding at that time, plus post-judgment interest from the date of the judgment, attorneys' fees and any other remedies available under the law.

IT IS FURTHER STIPULATED AND AGREED that nothing in this Stipulation of Settlement shall prejudice or shall be construed as prejudicing the authority of any other agency or instrumentality of this State.

IT IS FURTHER HEREBY STIPULATED AND AGREED, that this Stipulation of Settlement can be used in any subsequent civil or administrative proceeding by any licensing authority; and

IT IS FURTHER STIPULATED AND AGREED that 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

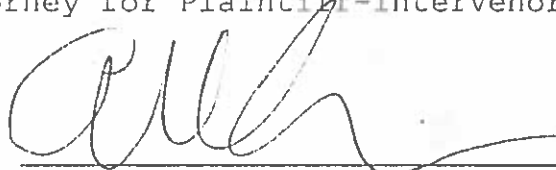
IT IS FURTHER HEREBY STIPULATED AND AGREED, that the penalties of this Stipulation of Settlement are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and protection of the public health, safety, and welfare, and are not intended to constitute debts which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

CONSENTED AS TO FORM, CONTENT AND ENTRY:

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff-Intervenor

Dated: 3-15-2018

By:



Anna M. Lascurain
Deputy Attorney General

Dated: 03/08/18



Alexander Lysenko
Pro Se