

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, New Jersey 08625-0117

By: Anna M. Lascurain,  
Deputy Attorney General  
NJ Atty. ID No. 006211994  
(609) 376-2965  
Anna.Lascurain@law.njoag.gov

SUPERIOR COURT OF NEW JERSEY  
UNION COUNTY  
DOCKET NO. UNN-L-002033-20

MARLENE CARIDE,  
COMMISSIONER OF THE )  
NEW JERSEY DEPARTMENT OF )  
BANKING AND INSURANCE, )  
Plaintiff, )  
v. )  
CANDICE LITTLE, )  
Defendant. )

Civil Action  
**STIPULATION OF SETTLEMENT**

The claims in this action have been settled and resolved limited to the following parties, Plaintiff, Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff"), and Defendant, Candice Little ("Defendant");

WHEREAS, for good cause shown, the Parties have reached an agreement resolving the issues in controversy, and consent to the

entry of the within Stipulation of Settlement ("Stipulation") pursuant to the terms and conditions below

1. Defendant admits to the commission of one violation of the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30 ("Fraud Act"), specifically, a violation of N.J.S.A. 17:33A-4(a)(1) for by knowingly submitting a material false statement in support of a claim for payment or other benefit.

2. Defendant shall pay a total aggregate settlement amount of \$5,675.00 ("Settlement Amount"). The Settlement Amount is comprised of \$3,500.00 in civil penalties pursuant to N.J.S.A. 17:33A-5(b), \$2,000.00 in attorneys' fees pursuant to N.J.S.A. 17:33A-5(b), and \$175.00 surcharge pursuant to N.J.S.A. 17:33A-5.1.

3. The Defendant shall pay the Settlement Amount upon the following terms and conditions:

a. No later than March 1, 2021, Defendant shall remit to the attorney for Plaintiff payment in the amount of \$300.00 by certified check, official bank check, money order, or attorney trust check made payable to the "Commissioner, New Jersey Department of Banking and Insurance" sent to:

Anna M. Lascurain, Deputy Attorney General  
Banking and Insurance Section  
R.J. Hughes Justice Complex  
25 Market Street

P.O. Box 117  
Trenton, New Jersey 08625

b. Commencing on no later than the 15th day of each month thereafter, until the Settlement Amount has been paid in full, the Defendant shall remit the monthly sum of \$100.00 by certified check, official bank check, money order, or attorney trust check 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

c. All communications/notices from any party concerning the subject matter of this Stipulation shall be addressed as follows:

If to the Plaintiff:

Anna M. Lascurain, DAG  
Banking and Insurance Section  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, New Jersey 08625

If to Defendant Little:

Mr. Edward Brinkmann, Esq.  
Central Jersey Legal Services  
60 Prince Street  
Elizabeth, NJ 07208

4. Simultaneously with the execution of this Stipulation, Defendant shall sign a separate Consent Judgment for the full Settlement Amount of \$5,675.00 ("Consent Judgment").

5. The filing of the fully executed Stipulation shall serve as a Stipulation of Dismissal with Prejudice of the Complaint except for the filing of the Consent Judgment pursuant to paragraph 4 herein.

6. This Stipulation shall be governed by the laws of the State of New Jersey without regard to any conflict-of-laws principles. The Parties agree that the exclusive jurisdiction and venue for any dispute arising between and among the Parties under the Stipulation will be the Superior Court of the State of New Jersey.

7. The penalties of this Stipulation 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.

8. To facilitate execution, this Agreement may be executed in as many counterparts as may be required. All counterparts hereof shall collectively constitute a single agreement.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

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

*Anna M. Lascurain*

Dated: February \_\_, 2021 By: \_\_\_\_\_

Anna M. Lascurain  
Deputy Attorney General

Edward Brinkmann, Esq.  
Attorney for Candice Little

Dated: February 17, 2021 By: \_\_\_\_\_

*Edward Brinkmann*  
Edward Brinkmann, Esq.

Dated: February 17, 2021 By: \_\_\_\_\_

*Candice Little*  
Candice Little  
Individually