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SUPERIOR COURT OF NEW JERSEY
SPECIAL CIVIL PART-UNION COUNTY
DOCKET NO. UNN-DC-006214-21

MARLENE CARIDE,
COMMISSIONER OF THE NEW
JERSEY DEPARTMENT OF
BANKING & INSURANCE,

Plaintiff,

v.

CHRISTOPHER GARRICK,

Defendant.

Civil Action

STIPULATION OF SETTLEMENT

WHEREAS Plaintiff Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), and Defendant Christopher Garrick ("Defendant") (collectively "Parties") have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement ("Stipulation").

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 pursuant to the terms and conditions below.

1. Defendant admits that he violated the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30 ("Fraud Act"), specifically, N.J.S.A. 17:33A-4(a)(1), by knowingly providing false and misleading statements to Progressive Garden State Insurance Company in support of a claim for payment.

2. Defendant's aforementioned conduct constitutes one violation of the Fraud Act, and any future violations of the Fraud Act shall be considered second and subsequent violations.

3. Defendant agrees that he shall not engage in any future violations of the Fraud Act.

4. Defendant shall pay a total amount of \$3,625 to the Commissioner ("Settlement Amount"). The Settlement Amount consists of \$2,500 in civil penalties pursuant to N.J.S.A. 17:33A-5(b); \$1,000 in attorneys' fees pursuant to N.J.S.A. 17:33A-5(b); and \$125 in statutory surcharge pursuant to N.J.S.A. 17:33A-5.1.

5. Defendant shall satisfy the Settlement Amount pursuant to the following terms and conditions:

a. Immediately upon execution of this Stipulation by Defendant, Defendant shall remit to the attorney for the Commissioner a payment in the full amount of \$3,625 by certified check, official bank check, or money order made payable to the

"Commissioner, New Jersey Department of Banking and Insurance" and sent to:

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

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

If to the Commissioner: Ashleigh B. Shelton
Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, New Jersey 08625

If to Defendant: Christopher Garrick
1408 Witherspoon Street
Rahway, NJ 07065

7. The filing of the fully executed Stipulation shall serve as a Stipulation of Dismissal with Prejudice of the Complaint.

8. 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.

9. 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.


10. Pursuant to N.J.S.A. 17:33A-10(c), a copy of this Stipulation shall be provided to any appropriate licensing authority. This Stipulation can be used in any subsequent civil or criminal proceeding.

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

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

ANDREW J. BRUCK
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 11/12/2021

By: 
Ashleigh B. Shelton
Deputy Attorney General

Dated: 11/9/2021


Christopher Garrick, Defendant