

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner of Banking)
and Insurance, State of New Jersey, to fine,)
suspend, and/or revoke the insurance license)
of Stanley Jerome, Reference No. 1300747)
_____)

FINAL ORDER

TO: Stanley Jerome
329 Lincoln Avenue
Orange, NJ 07050

This matter, having been opened by the Commissioner of Banking and Insurance (“Commissioner”), State of New Jersey, upon issuance of Order to Show Cause E19-54 alleging that Stanley Jerome (“Respondent”) may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Respondent was licensed as a nonresident insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-34(a) until his license expired on August 31, 2015; and

WHEREAS, Respondent is subject to the provisions of the New Jersey Insurance Producer Licensing Act of 2001, N.J.S.A. 17:22A-26 to -48 (“Producer Act”); the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30 (“Fraud Act”) and the regulations promulgated thereunder, N.J.A.C. 11:16-1.1 to -7.10; the Producer Licensing regulations, N.J.A.C. 11:17-1.1 to -2.17; the regulations governing Insurance Producer Standards of Conduct, N.J.A.C. 11:17A-1.1 to 11:17D-2.8; and the Persons Employed in the Business of Insurance regulations, N.J.A.C. 11:17E-1.1 to -1.7; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(d), the Commissioner shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by the Producer Act and Title 17 of the Revised Statutes or Title 17B of the New Jersey Statutes against any person who is under investigation for or charged with a violation of the Producer Act or Title 17 of the Revised Statutes or Title 17B of the New Jersey Statutes even if the person's license or registration has been surrendered or has lapsed by operation of law; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(2), an insurance producer shall not violate any insurance law, regulation, subpoena, or order of the Commissioner or of another state's insurance regulator; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(5), an insurance producer shall not intentionally misrepresent the terms of an actual or proposed insurance contract, policy, or application for insurance; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(6), an insurance producer shall not be convicted of a felony or crime of the fourth degree or higher; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(7), an insurance producer shall not admit or be found to have committed any insurance unfair trade practice or fraud; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(8), an insurance producer shall not use fraudulent, coercive, or dishonest practices, or demonstrate incompetence, untrustworthiness, or financial irresponsibility in the conduct of insurance business in this State or elsewhere; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(16), an insurance producer shall not commit any fraudulent act; and

WHEREAS, pursuant to N.J.S.A. 17B:30-13, except as otherwise expressly provided by law, no person shall knowingly make, permit to be made or offer to make any contract of life

insurance, annuity or health insurance, or agreement as to such contract other than as plainly expressed in the contract issued thereon, or pay or allow, or give or offer to pay, allow, or give, directly or indirectly, as an inducement to such insurance, or annuity, any rebate of premiums or considerations payable on the contract or of any agent's, solicitor's, or broker's commission relating thereto, or any special favor or advantage in the dividends or other benefits thereon, or any valuable consideration or inducement whatever not specified in the contract; or give, or sell, or purchase, or offer to give, sell, or purchase as an inducement to such insurance or annuity or in connection therewith, any stocks, bonds, or other securities of any insurance company or other corporation, association, or partnership or any dividends or profits accrued thereon, or anything of value whatsoever not specified in the contract; and

WHEREAS, pursuant to N.J.A.C. 11:17A-2.3(h), services or monetary benefits provided for free or at a discounted price that inure to the personal benefit of the person and that are largely extraneous to the coverage being purchased or the insurance services being provided by an insurance producer, or services offered in a discriminatory manner as an inducement to write or move business shall be deemed a prohibited rebate(s) or inducement(s). Examples of such services or benefits that the Department would consider prohibited rebates or inducements include payments of cash or cash equivalents of greater than \$100.00; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a), the Commissioner may place on probation, suspend, revoke, or refuse to issue or renew an insurance producer's license or may levy a civil penalty in accordance with N.J.S.A. 17:22A-45(c), or any combinations of actions for violations of the Producer Act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-45(c), any person violating the Producer Act is subject to a penalty not exceeding \$5,000 for the first offense and not exceeding \$10,000 for each

subsequent offense; moreover, the Commissioner may order restitution of moneys owed any person and reimbursement of the costs of investigation and prosecution, as appropriate; and

WHEREAS, pursuant to N.J.S.A. 17:33A-4(a)(4)(b), a person violates the Fraud Act if he or she prepares or makes any written or oral statement, intended to be presented to any insurance company or producer for the purpose of obtaining an insurance policy, knowing that the statement contains any false or misleading information concerning any fact or thing material to an insurance application or contract; and

WHEREAS, pursuant to N.J.S.A. 17:33A-5(a) and -5(c), violations of the Fraud Act subject the violator to a civil and administrative penalty of up to \$5,000.00 for the first violation, up to \$10,000.00 for the second violation, and up to \$15,000.00 for each subsequent violation; moreover, the Commissioner may issue a final order assessing penalties and costs of prosecution, including attorneys' fees; and

WHEREAS, pursuant to N.J.S.A. 17:33A-5.1, any person who is found in any legal proceeding to have committed insurance fraud shall be subject to a surcharge in the amount of \$1,000.00; and

WHEREAS, on June 10, 2019, the Commissioner issued Order to Show Cause E19-54, alleging violations of New Jersey insurance laws by Respondent as set forth as follows:

FACTUAL ALLEGATIONS

IT APPEARING THAT, on or about June 5, 2013, Respondent entered into a contractual relationship with Massachusetts Mutual Insurance Company ("Mass Mutual") to sell insurance products; and

IT FURTHER APPEARING THAT, between June 18, 2013 and January 30, 2015, Respondent submitted 217 whole life insurance applications to Mass Mutual; and

IT FURTHER APPEARING THAT, in the 217 applications submitted to Mass Mutual, Respondent used the personal identifying information obtained from individual consumers; and

IT FURTHER APPEARING THAT, Respondent obtained each individual consumer's personal identifying information by offering free life insurance and cash payments in exchange for usage of their personal identifying information; and

IT FURTHER APPEARING THAT, Respondent offered additional cash payments to the individual consumers if they opened bank accounts in their own names and provided account access to Respondent; and

IT FURTHER APPEARING THAT, in the 217 applications submitted to Mass Mutual, Respondent fabricated or otherwise made false statements regarding individual consumers' employment, income, and/or net worth; and

IT FURTHER APPEARING THAT, in connection with the 217 applications, Respondent submitted preauthorized forms to Mass Mutual that authorized the automatic monthly withdrawal of premiums from bank accounts belonging to the individual consumers; and

IT FURTHER APPEARING THAT, Mass Mutual approved 127 of the 217 applications submitted by Respondent resulting in the issuance of 127 whole life insurance policies; and

IT FURTHER APPEARING THAT, as a result of the 127 issued policies Respondent earned commissions totaling \$1,132,675.00; and

IT FURTHER APPEARING THAT, Respondent remitted parts of the earned commissions to the individual consumers as compensation for usage of their personal identifying information; and

IT FURTHER APPEARING THAT, Respondent transferred parts of the earned commissions to individual consumers' bank accounts in order to fund the premiums being paid from those bank accounts; and

IT FURTHER APPEARING THAT, Mass Mutual would not have issued the policies or paid commissions in connection with those policies if Mass Mutual had known that any of the information in those applications was false, misleading, or fraudulent; and

IT FURTHER APPEARING THAT, on March 28, 2016, Respondent pleaded guilty to Accusation No. 16-03-0077, in the Superior Court of New Jersey, Law Division – Criminal, County of Essex, to one count of Financial Facilitation of Criminal Activity, Second Degree, in violation of N.J.S.A. 2C:21-25(b)(1), and to one count of Insurance Fraud, Second Degree, in violation of N.J.S.A. 2C:21-4.6; and

IT FURTHER APPEARING THAT, on May 16, 2016, Respondent was convicted of the aforementioned criminal offenses, sentenced to three years' incarceration, and ordered to pay Mass Mutual restitution in the amount of \$750,000; and

COUNT ONE
(PRODUCER ACT)

IT FURTHER APPEARING, that Respondent, by submitting 217 applications for insurance to Mass Mutual for the purpose of obtaining insurance policies that contained fabricated or otherwise made false statements regarding individual consumers' employment, income, and/or net worth: (i) violated insurance laws and regulations; (ii) intentionally misrepresented the terms of an actual or proposed insurance contracts, policies, or applications for insurance; (iii) used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility in the conduct of insurance business in this State; and (iv) committed fraudulent acts, in violation of N.J.S.A. 17:22A-40(a)(2), (5), (8), and (16); and

COUNT TWO
(FRAUD ACT)

IT FURTHER APPEARING, that Respondent, by submitting 217 applications for insurance to Mass Mutual for the purpose of obtaining insurance policies, Respondent prepared written statements intended to be presented to an insurance company, knowing that the statements contained false or misleading information concerning things material to the insurance applications or contracts, in violation of N.J.S.A. 17:33A-4(a)(4)(b); and

COUNT THREE
(PRODUCER ACT)

IT FURTHER APPEARING, that Respondent was convicted of Financial Facilitation of Criminal Activity, N.J.S.A. 2C:21-25(b)(1), Second Degree, and Insurance Fraud, N.J.S.A.

2C:21-4.6, Second Degree, and, as such: (i) was convicted of a felony or crime of the fourth degree or higher, and (ii) was found to have committed fraud, in violation of N.J.S.A. 17:22A-40(a)(6) and (7); and

COUNT FOUR
(PRODUCER ACT)

IT FURTHER APPEARING, that Respondent offered free life insurance and cash payments to individuals in exchange for usage of their personal identifying information as an inducement to write or move business, in violation of N.J.S.A. 17B:30-13 and N.J.A.C. 11:17A-2.3(h); and

WHEREAS, as set forth in the Certification of Brian R. Fitzgerald ("Fitzgerald Cert"), attached hereto a Exhibit B, Respondent was given notice of the aforesaid charges and an opportunity to contest the charges at a hearing pursuant to Order to Show Cause E19-54, which was duly served upon Respondent by personal service; and

WHEREAS, Respondent failed to provide a written response to the charges contained in Order to Show Cause E19-54 within twenty days or at any time as provided by N.J.A.C. 11:17D-2.1(d)(1), and therefore has waived his right to a hearing to contest these charges and the charges are deemed admitted pursuant to N.J.A.C. 11:17D-2.1(b)(1);

NOW, THEREFORE, IT IS on this *17th* day of *September*, 2019

ORDERED, that the charges contained in Counts 1, 2, 3, and 4 of Order to Show Cause E19-54 are deemed admitted by Respondent, pursuant to N.J.A.C. 11:17D-2.1(b)(1); and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-40 and N.J.A.C. 11:17D-2.1(b)(2), the insurance producer license of Respondent is **REVOKED** effective upon the execution of this Final Order; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-45(c) and N.J.S.A. 17:33A-5(a) and -5(c), Respondent is responsible for the payment of \$696,400.00, allocated as follows: \$347,700.00 penalty for 217 violations of the Producer Act (Counts One and Four); \$347,700.00 penalty for 217 violations of the Fraud Act (Count Two); and a \$1,000.00 statutory surcharge, pursuant to N.J.S.A. 17:33A-5.1; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22B-17, Respondent shall pay restitution directly to Mass Mutual in the amount of \$750,000.00 as ordered by the Superior Court of New Jersey, Law Division – Criminal, County of Essex, as described above, with proof of payment to be sent to the Department; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-45c and N.J.A.C. 11:1-32.4(b)(20), Respondent shall reimburse the Department of Banking and Insurance for the costs associated with the investigation and prosecution of this matter, as evidenced by the Certification of Costs by Matthew C. Gervasio, attached hereto as Exhibit A, totaling \$562.50; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:33A-5(c), Respondent is responsible for the payment of \$8,526.50 in attorneys' fees as evidenced by the Fitzgerald Cert.; and

IT IS FURTHER ORDERED, that Respondent shall pay the above fines and costs totaling \$705,489.00 in full by remitting payment to the Commissioner of Banking and Insurance, State of New Jersey, 20 West State Street, P.O. Box 329, Trenton, New Jersey 08625, Attention: Virgil Downtin, Chief of Investigations, by certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury," within ten (10) days from the date of service of this Order; and

IT IS FURTHER ORDERED, that in the event full payment of the fines and costs is not made, the Commissioner may exercise any and all remedies available by law, including but not limited to recovery of any unpaid penalties, in accordance with the Penalty Enforcement Law of 1999, N.J.S.A. 2A:58-10 to -12; and

IT IS FURTHER ORDERED, that the fines in this Final Order are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and the 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; and

IT IS FURTHER ORDERED, that the provisions of this Final Order represent a final agency decision and constitute a final resolution of the allegations contained in Order to Show Cause E19-54.



Marlene Caride
Commissioner

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

Proceedings by the Commissioner of Banking
and Insurance, State of New Jersey, to fine, suspend
and/or revoke the insurance producer license of
Stanley Jerome, Reference No. 1300747.

**CERTIFICATION OF
COSTS**

I, Matthew C. Gervasio, of full age, does hereby certify as follows:

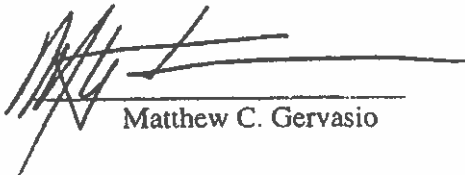
1. I am employed by the New Jersey Department of Banking and Insurance (“Department”) and hold the title of Investigator.
2. This certification is submitted in support of the Department’s application for reimbursement of its costs of investigation and prosecution, in accordance with N.J.S.A. 17:22A-45(c) and N.J.A.C. 11:1-32.4(b)(20).
3. On or about May 10, 2017, I was assigned the responsibility for conducting an investigation to determine whether Respondent Stanley Jerome (“Respondent”) violated certain provisions of the New Jersey Insurance Producer Licensing Act of 2001, N.J.S.A. 17:22A-26 to -48 (“Producer Act”), which investigation contributed to the issuance of Order to Show Cause No. E19-54.
4. To determine the amount of time that Department investigators spent in the investigation and prosecution of this matter, I reviewed the Department’s files relative to this matter, including investigator time records. Based on this review I have prepared the schedule of costs attached hereto as Exhibit 1.

5. As this schedule reflects, Department investigators spent at least 11.25 hours investigating and prosecuting this matter.

6. Pursuant to N.J.A.C. 11:1-32.4(b)(20), costs to the Department for the investigation and prosecution for violations of the Producer Act are reimbursable at the rate of \$50.00 per hour, rounded to the nearest quarter hour.

7. I therefore request that the Department's costs of investigation and prosecution be reimbursed in the amount of \$562.50.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false I am subject to punishment.



Matthew C. Gervasio

Dated: 8/13/2019



State of New Jersey
 DEPARTMENT OF BANKING AND INSURANCE
 DIVISION OF INSURANCE
 CONSUMER PROTECTION SERVICES
 ENFORCEMENT UNIT
 PO BOX 329
 TRENTON, NJ 08625-0329

PHIL MURPHY
 Governor

SHEILA OLIVER
 Lt. Governor

MARLENE CARIDE
 Commissioner

TEL (609) 292-5316
 FAX (609) 292-5337

Exhibit 1

**RECORD OF TIME EXPENDED ON
 INVESTIGATION AND/OR PROSECUTION**

Re: Stanley Jerome
 Department File No.: 226580
 Investigator: Matthew C. Gervasio

Date	Time in Hours	Phone	Case Prep	Comments
5-29-2015	1			Documentation obtained from MassMutual and reviewed
5-13-2015	.5		Investigative report #1	
5-20-2015	.25			Spoke with respondent to confirm mailing address and prepared report of contact
6-9-2015	1		Investigative report #2	
4-6-2016	.25		Investigative report #3	
5-19-2016	.25		Investigative report #4	
8-23-2016	.25		Investigative report #5	
11-14-2016	.25		Investigative report #6	
5-10-2017	1			Investigation file and documentation reviewed
6-7-2017 to 1-30-2019	3			Various discussions with BFD and DAG regarding handling of global case

6-7-2017	1		Investigative report #7	
6-16-2017	2		F&E	
7-26-2019	.5		Schedule of Costs	
TOTAL:	11.25 Hours			
Hours @ \$50 x hrs	= \$562.50			

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner of Banking)
and Insurance, State of New Jersey, to fine,)
suspend, and/or revoke the insurance license)
of Stanley Jerome, Reference No. 1300747.)
_____)

**CERTIFICATION OF
BRIAN R. FITZGERALD**

I, Brian R. Fitzgerald, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am a Deputy Attorney General assigned as counsel for the Department of Banking and Insurance, State of New Jersey (“Department”), in the above-captioned matter. I make this certification in support of entry of the Final Order against Respondent Stanley Jerome (“Respondent”).

SERVICE OF ORDER TO SHOW CAUSE NO. E19-54 ON RESPONDENT

2. On June 10, 2019, the Commissioner issued Order to Show Cause No. E19-54 (“Order to Show Cause”) against Respondent charging him with violations of the insurance laws of this State.

3. Pursuant to N.J.A.C. 11:17D-2.1(a)(3), the Order to Show Cause “shall be served by personal delivery, or by certified mail to the alleged violator’s last known business or mailing address, according to the files maintained by the Department. Service in this manner shall be considered lawful service on the alleged violator.”

4. On June 14, 2019, our office mailed Order to Show Cause No. E19-54 to Respondent via certified mail, return receipt requested, and regular mail to Respondent's last known business address on file with the Department at 257 Mount Vernon Avenue, Orange, New Jersey 07051.

5. The regular mailing was returned "Attempted – Not Known – Unable to Forward," and the certified mailing was returned "Unable to Forward." (True and exact copies of the returned regular and certified mailing envelopes are attached collectively hereto as Exhibit 1.)

6. On June 14, my office also mailed the Order to Show Cause to Respondent via certified mail, return receipt requested, and regular mail to Respondent's last known residential address according to an electronic search of public records at 329 Lincoln Avenue, Orange, New Jersey 07050.

7. The regular mailing was not returned to this office and the certified mailing was returned "Unclaimed – Unable to Forward." (A true and exact copy of the returned certified mailing envelope is attached hereto as Exhibit 2.)

8. On July 9, 2019, Department Investigator Dana Della Valle personally served a copy of the Order to Show Cause on Respondent at 329 Lincoln Avenue, Orange, New Jersey 07050. (A true and exact copy of the Affidavit of Service is attached hereto as Exhibit 3.)

9. Personal service of the Order to Show Cause on Respondent as described above constitutes lawful service upon Respondent.

ATTORNEYS' FEES PURSUANT TO N.J.S.A. 17:33A-5(b)

10. Court costs and reasonable attorneys' fees are mandated by the Fraud Act. N.J.S.A. 17:33A-5(b). The New Jersey Department of Law and Public Safety, Division of Law ("DOL")

has established a Schedule of Attorneys' Fees that provides a uniform hourly rate of compensation for DOL legal staff. (A true and exact copy of this schedule is attached as Exhibit 4.)

11. DOL legal staff complete daily timesheets that document the legal services performed. For each matter, the DOL timekeeping system requires the activity date, an activity code, and the time spent for each particular activity. The client activity codes are designated as follows:

CAD - Administration	CMB - Motion/Brief
CAP - Appearance	CMS - Miscellaneous
CCM - Conference/Meeting/ Telephone	CPR - Prep Trial/Hearing/ Argument
CCR - Correspondence	CRW - Research/Writing
CDR - Contract/Document Review	CSP - Supervision
CDS - Discovery	CTL - Travel
CIV - Investigation	

12. I have reviewed timekeeping records and documentation in the file to determine the amount of time expended by myself and other DOL legal staff on the matter. Plaintiff is seeking compensation for the legal services provided by Raymond R. Chance, III, Assistant Attorney General; Nicholas Kant, Assistant Section Chief/Deputy Attorney General; Ryan S. Schaffer, Deputy Attorney General; and Brian R. Fitzgerald, Deputy Attorney General.

13. As an attorney with over twenty (20) years of legal experience, the hourly rate of compensation for Assistant Attorney General Chance is \$300.00 per hour. As attorneys with eleven (11) to twenty (20) years of legal experience, the hourly rate of compensation for Assistant Section Chief Kant and Deputy Attorney General Fitzgerald is \$260.00 per hour. As an attorney with six (6) to ten (10) years of legal experience, the hourly rate of compensation for Deputy Attorney General Schaffer is \$235.00 per hour. (See Exhibit 4.)

14. Assistant Attorney General Chance spent a total of .9 hours in the supervision of this matter. Assistant Section Chief Kant spent a total of 2.5 hours in the supervision of this matter. Deputy Attorney General Schaffer spent a total of 17.1 hours in the review, preparation, and prosecution of this matter. I spent a total of 13.8 hours in the review, preparation, and prosecution of this matter, including drafting the Order to Show Cause and the Final Order. Accordingly, Commissioner seeks compensation for all of this time, for a total of \$8,526.50 in legal services.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

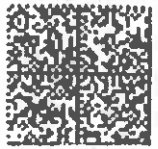


Brian R. Fitzgerald

Dated: September 5, 2019

EXHIBIT 1

U.S. POSTAGE  PITNEY BOWES
ZIP 08628 \$ 001.30⁰
02 1M
0001389439 JUN 14 2019



From Brian P. Fitzgerald
DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

To: Stanley Jerome
257 Mount Vernon Avenue
Orange, NJ 07051

-R-T-8- 070515086-1N 06/20/19

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
RETURN TO SENDER





ZIP 08628 \$007.60
02 1W
0001389439 JUN 14 2019



7018 2290 0001 8037 3058

DEPARTMENT
P
DIVISION

W.R. Fitzgerald
PUBLIC SAFETY
Complex
RENTON, NJ 08625

1106

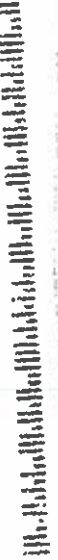
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06/24/19

00005097-1N

-R-T-8-

RETURN TO SENDER
UNABLE TO FORWARD
UNABLE TO FORWARD
RETURN TO SENDER



PLACE STICKER AT TOP OF MAILING LABEL
OF THE RETURN ADDRESS LABEL AT THE RIGHT

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Stanley Jerome
 257 Mount Vernon Avenue
 Orange, NJ 07051



9590 9402 3124 7166 0660 60

2. Article Number (Transfer from service label)
 7013 2290 0001 8037 3058

PS Form 3811, July 2015 PSN 7530-02-000-9063

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee
 X

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

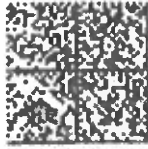
3. Service Type
- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input checked="" type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input checked="" type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

EXHIBIT 2

U.S. POSTAGE  PITNEY BOWLES

ZIP 08628 \$ 007.60⁰
02 1M
0001389439 JUN 14 2019



7018 2290 0001 8037 3034

From Brian P. Fitzgerald JAG

DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

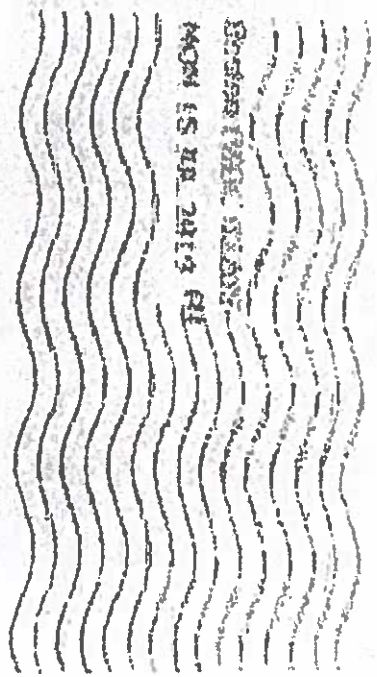
To:

Stanley Jerome
329 Lincoln Avenue
Apar -R-T-S- 070502055-IN
Orar

25

07/13/19

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
RETURN TO SENDER



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



EXHIBIT 3

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner of Banking)
and Insurance, State of New Jersey, to fine,)
suspend, and/or revoke the insurance license)
of Stanley Jerome, Reference No. 1300747.)
_____)

AFFIDAVIT OF SERVICE

I, Dana Della Valle, of full age, being duly sworn, according to law upon my oath, depose
and say:

1. I am employed as a Civil Investigator with the New Jersey Department of Banking and
Insurance, Bureau of Fraud Deterrence .

2. I am over eighteen years of age.

3. That on July 2, 2019, I served a true copy of Order to Show Cause No. E19-54 ("OTSC")
on Respondent Stanley Jerome ("Respondent") by delivering a true copy of the OTSC personally
to Respondent.

4. Service was accomplished at 329 Lincoln Avenue, Orange, NJ 07050.

State of New Jersey
County of Essex



Dana Della Valle
Investigator
Department of Banking and Insurance

Subscribed and Sworn before
me on this 9th day of
July 2019.

Name: Jude A. Tanella

Signature: 

JUDE A. TANELLA
NOTARY PUBLIC OF NEW JERSEY
Comm. # 50081788
My Commission Expires 6/2/2022

My commission expires: _____

EXHIBIT 4

SCHEDULE OF ATTORNEY FEES
HOURLY RATE OF COMPENSATION FOR LEGAL STAFF

Michelle L. Miller, Acting Director, Division of Law has determined that effective September 1, 2015, the uniform rate of compensation in cases where the State is entitled to recovery of fees be and hereby is amended as follows:

PARALEGAL	\$75 per hour
LAW ASSISTANT	\$150 per hour
DEPUTY ATTORNEY GENERAL	\$200 per hour
(0-5 years of legal experience)	
DEPUTY ATTORNEY GENERAL	\$235 per hour
(6-10 years of experience)	
DEPUTY/ASSISTANT ATTORNEY GENERAL	\$260 per hour
(11-20 years of experience)	
DEPUTY/ASSISTANT ATTORNEY GENERAL	\$300 per hour
(more than 20 years of experience)	