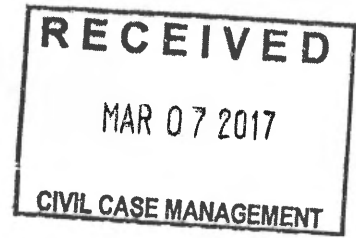


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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION-MERCER COUNTY
DOCKET NO. MER-C-

RICHARD J. BADOLATO,)
COMMISSIONER OF THE)
DEPARTMENT OF BANKING AND)
INSURANCE OF NEW JERSEY,)
)
Plaintiff,)
)
v.)
)
IFA INSURANCE COMPANY,)
)
)
Defendant.)

Civil Action

PETITION FOR LIQUIDATION

TO: Honorable Paul Innes, P.J. Ch. Div.
Superior Court of New Jersey, Chancery Division
Mercer County Civil Courts Building
175 South Broad Street
Trenton, NJ 08650

IFA Insurance Company
35 Walnut Avenue
Clark, NJ 07066
ATTN: David Donlan Walsh, President

Independent Financial Agents, Inc.
35 Walnut Avenue
Clark, NJ 07066
ATTN: David Donlan Walsh, Director

Mary Lou Iannone, Director, Independent Financial Agents,
Inc.
411 Moosehorn Road
Thomaston, CT 06787

Michael Ford, Director, Independent Financial Agents, Inc.
1606 Westfield Avenue
Clark NJ 07066

New Jersey Property-Liability Insurance Guaranty
Association
233 Mount Airy Road
Basking Ridge, NJ 07920
ATTN: Joseph DellaFera, Chief Executive Officer

Delaware Insurance Guaranty Association
220 Continental Drive
Suite 309
Newark, DE 19713
ATTN: Barry Miller, Executive Director

Maryland Property & Casualty Insurance Guaranty Corporation
305 Washington Avenue
Suite 600
Towson, MD 21204-4715
ATTN: John R. Spielberger, President

Pennsylvania Property & Casualty Insurance Guaranty
Association
One Penn Center, Suite 1850
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103
ATTN: Stephen F. Perrone, Executive Director

PLEASE TAKE NOTICE that as soon as counsel may be
heard, Christopher S. Porrino, Attorney General of New Jersey,
by William B. Puskas, Jr., Deputy Attorney General, attorney for

Richard J. Badolato, Commissioner of Banking and Insurance, will move before the court at a date and time to be set by the Honorable Paul Innes, P.J. Ch. Div., for: (1) an Order To Show Cause with Temporary Restraints; and (2) an Order approving the liquidation of IFA Insurance Company.

PLEASE TAKE FURTHER NOTICE that in support of this application, the Commissioner will rely on the Letter Brief and the Certification of Steven P. Kerner, Jr., Assistant Commissioner of Solvency Regulation, submitted in support of this Petition.

A form of Order to Show Cause and a form of Order of Liquidation are also submitted with this Petition.

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL
OF NEW JERSEY

By: 

William B. Puskas, Jr.
Deputy Attorney General

Dated: March 7, 2017