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SUPERIOR COURT OF NEW JERSEY  
 SPECIAL CIVIL PART-GLOUCESTER COUNTY  
 DOCKET NO. GLO-DC-004555-14

KENNETH E. KOBYSLOWSKI  
 COMMISSIONER OF THE NEW  
 JERSEY DEPARTMENT OF  
 BANKING AND INSURANCE,

Plaintiff,  
 v.

KIERSTIN C. DWORNICK,  
 Defendant.

Civil Action

**STIPULATION OF SETTLEMENT**

WHEREAS Kenneth E. Kobylowski, Commissioner of the New Jersey Department of Banking and Insurance, and Defendant, Kierstin C. Dwornick, have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement; and

IT IS HEREBY STIPULATED AND AGREED that, Defendant Kierstin C. Dwornick admits that she knowingly made written or oral statements on July 27, 2012 on an application for automobile insurance with to Citizens United Reciprocal Insurance Company ("CURE") that her principal residence and the

insured vehicle would be garaged in this State when she actually resided in Philadelphia, Pennsylvania, for the purpose of obtaining a motor vehicle insurance policy;

IT IS HEREBY STIPULATED AND AGREED that, Defendant Kierstin C. Dwornick admits that she knowingly made written or oral statements to CURE on the July 27, 2012 automobile application that she did not disclose Ashot Gabrielants as a household resident of the policy address and/or driver of the insured vehicle;

IT IS FURTHER HEREBY STIPULATED AND AGREED that this conduct constitutes two violations of N.J.S.A. 17:33A-4, and that any future violation of the New Jersey Insurance Fraud Prevention Act shall be considered a subsequent violation; and

IT IS FURTHER HEREBY STIPULATED AND AGREED that Defendant Dwornick shall pay a total sum of \$3,125.00 to the Commissioner of the New Jersey Department of Banking and Insurance. The amount consists of civil penalties in the amount of \$2,500.00; attorneys' fees and costs in the amount of \$500.00, pursuant to N.J.S.A. 17:33A-5b; and a statutory insurance fraud surcharge of \$125.00, in accordance with N.J.S.A. 17:33A-5.1, to be satisfied by remitting to the attorney for the Commissioner full payment in the amount of \$3,125.00, by certified check, official bank check or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

Kristina Cretella, Deputy Attorney General  
Banking, Insurance and Insurance Fraud Section  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, N.J. 08625-0117

IT IS FURTHER HEREBY STIPULATED AND AGREED that pursuant to N.J.S.A. 17:33A-10c, a copy of this Stipulation of Settlement shall be provided to any appropriate licensing authority.

**CONSENTED AS TO FORM, CONTENT AND ENTRY:**

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff

Dated: 4/10/2015

By: *Kristina Cretella*  
Kristina Cretella  
Deputy Attorney General

*Kristina Dwornick*  
Kierstin G. Dwornick  
Defendant

Dated: April 10<sup>th</sup> 2015