

from C.C. when she knew that she had not rendered or been compensated for any services; and

IT IS FURTHER STIPULATED AND AGREED that Defendant admits that the above conduct constitutes ninety-nine violations of the Fraud Act, and that any future violation of the Fraud Act shall be considered a third offense; and

IT IS FURTHER STIPULATED AND AGREED that Defendant shall pay a sum of \$9,313.45 ("Settlement Amount") to the Commissioner, which consists of a civil penalty in the amount of \$7,500.00 in accordance with N.J.S.A. 17:33A-5b, a \$375.00 surcharge in accordance with N.J.S.A. 17:33A-5.1, and \$1,438.45 in attorneys' fees and costs in accordance with N.J.S.A. 17:33A-5b, to be paid upon execution of this Stipulation of Settlement:

IT IS FURTHER STIPULATED AND AGREED that Defendant shall remit payment of the Settlement Amount to the Commissioner as follows:

- \$1,862.69 as an initial down payment due upon the execution of this Stipulation of Settlement. Payment shall be made by certified check, bank check, or money order made payable to "Commissioner, New Jersey Department of Banking and Insurance." This Stipulation of Settlement and initial down payment shall be returned to:

Gordon A. Queenan, DAG
Banking and Insurance Section
25 Market Street, P.O. Box 117
Trenton, NJ 08625

- \$300.00 per month for twenty-four months, beginning February 1, 2016 and continuing thereafter on the first day of each consecutive month until January 1, 2018, with a final payment of \$250.76 due on February 1, 2018. Each monthly payment shall be made by certified check, bank check, or money order made payable to "Commissioner, New Jersey Department of Banking and Insurance" and remitted to:

Commissioner
New Jersey Department of Banking and Insurance
Attn: Rose McGill, Fraud Collections
20 West State Street
P.O. Box 325
Trenton, NJ 08625

- In conjunction with the execution of this Stipulation of Settlement, the parties shall also enter into a Consent Judgment for the entire settlement amount.

IT IS FURTHER STIPULATED AND AGREED that if Defendant fails to make any scheduled payment within ten days of its due date, the Commissioner may, upon written notice to Defendant, declare the entire outstanding balance to be immediately due and payable. Thereafter, the Commissioner may take any action available under the laws of this State to collect the amount

outstanding at that time, including post-judgment interest from the date the judgment, attorneys' fees, and any other remedies available under the law; and

IT IS FURTHER STIPULATED AND AGREED that this Stipulation of Settlement may be used against Defendant in any civil or administrative proceeding related to a violation of the Fraud Act, including a professional license suspension or revocation proceeding; and

IT IS FURTHER 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 professional licensing authority; and

IT IS FURTHER STIPULATED AND AGREED that the penalties of this Stipulation of Settlement 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.

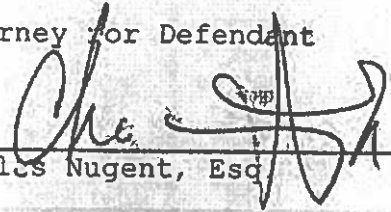
JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 1/11/16

By: GH 2
Gordon A. Queenan
Deputy Attorney General

Attorney for Defendant

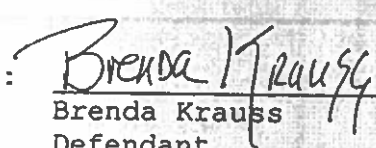
By:


Charles Nugent, Esq

Dated:

12/28/15

By:


Brenda Krauss
Defendant

Dated:

12/18/15