

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
R. J. Hughes Justice Complex
25 Market Street
P. O. Box 117
Trenton, New Jersey 08625
Attorney for Plaintiff

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JOSEPH G. MONAGHAN, J.S.C.

By: Brian R. Fitzgerald
Deputy Attorney General
NJ Attorney ID: 024972004
(609) 292-9246
brian.fitzgerald@law.njoag.gov

MARLENE CARIDE, ACTING)	SUPERIOR COURT OF NEW JERSEY
COMMISSIONER OF THE NEW JERSEY)	SPECIAL CIVIL PART - BERGEN
DEPARTMENT OF BANKING AND)	COUNTY
INSURANCE,)	
)	Docket No. BER-DC-1265-18
Plaintiff,)	
)	<u>Civil Action</u>
v.)	
)	<u>STIPULATION OF SETTLEMENT</u>
DANIELLA OYEBOLA,)	
)	
Defendant.)	

The claims in this action having been settled and resolved between plaintiff, Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff"), and defendant, Daniella Oyegbola ("Defendant"):

WHEREAS, the parties have reached an amicable agreement resolving the allegations in controversy as raised in Plaintiff's January 23, 2018 Complaint ("Complaint"), and have

consented to the entry of the within Stipulation of Settlement;
and

WHEREAS, Defendant neither admits or denies the allegations as stated in the Complaint and consents to the payment of a total of \$2,575.00 ("Settlement Amount"), which amount consists of civil penalties of \$1,500.00 pursuant to the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30; attorneys' fees and costs in the amount of \$1,000.00, pursuant to N.J.S.A. 17:33A-5b; and an insurance surcharge of \$75.00, in accordance with N.J.S.A. 17:33A-5.1; and

IT IS STIPULATED AND AGREED, that, upon Defendant's execution of this Stipulation of Settlement, the Settlement Amount shall be paid as follows:

- within fifteen (15) days of*
- a) \$1,000.00 to be paid, ~~upon~~ execution of this Stipulation of Settlement;
 - b) \$175.00 per month for nine months to commence thirty (30) days after the date of this Order; and

IT IS FURTHER STIPULATED AND AGREED, that Defendant shall remit to the attorney for Plaintiff all payments towards the Settlement Amount, by certified check, official bank check, or money order, made payable to "Treasurer, State of New Jersey" and sent to:

Brian R. Fitzgerald, Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, New Jersey 08625-0117

IT IS FURTHER STIPULATED AND AGREED, that, in conjunction with the execution of this Stipulation of Settlement, the parties shall also enter into a Consent Judgment for the entire Settlement Amount; and

IT IS FURTHER STIPULATED AND AGREED, that, in the event the Settlement Amount is not fully paid, Plaintiff may exercise any and all remedies available by law, including, but not limited to, recovery of any unpaid penalties pursuant to the Penalty Enforcement Law, N.J.S.A. 2A:58-10 et seq.; and

IT IS FURTHER HEREBY STIPULATED AND AGREED, that this Stipulation of Settlement can be used in any subsequent civil or criminal proceeding; and

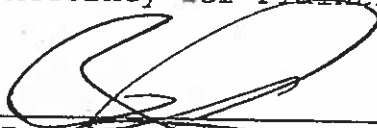
IT IS FURTHER STIPULATED AND AGREED, that the penalties of this Stipulation of Settlement are imposed pursuant to the police powers of the State of New Jersey for the

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.


CONSENTED AS TO FORM, CONTENT AND ENTRY OF ORDER:

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 3/22/18

By: 

Brian R. Fitzgerald
Deputy Attorney General



Daniella Oyegbola
Defendant pro se

Dated: 3/22/18