

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
R.J. Hughes Justice Complex
25 Market Street
P. O. Box 117
Trenton, New Jersey 08625-0117
Attorney for Plaintiff

By: Richard E. Wegryn, Jr.
Deputy Attorney General
Attorney ID 048361993
(609)376-2965
Richard.Wegryn@law.nj.oag.gov

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MONMOUTH COUNTY
DOCKET NO. MON-L-001907-18

MARLENE CARIDE,)	
COMMISSIONER OF THE NEW)	Civil Action
JERSEY DEPARTMENT OF)	
BANKING AND INSURANCE,)	STIPULATION OF SETTLEMENT
Plaintiff,)	
)	
v.)	
)	
A&G STAFFING SOLUTIONS,)	
LLC, ONSET PERSONNEL, INC.,)	
JOSEPH IUORIO III, AND)	
VANESSA RODRIGUEZ,)	
)	
Defendants.)	

The claims in this action have been settled and resolved limited to the following parties, Plaintiff, Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff"), and Defendants, Vanessa Rodriguez, and A&G Staffing Solutions, LLC (hereinafter "Defendants"), collectively "Parties;"

WHEREAS, for good cause shown, the Parties have reached an agreement resolving the issues in controversy, and consent to the entry of the within Stipulation of Settlement ("Stipulation") pursuant to the terms and conditions below.

1. Defendants admit that they knowingly provided false and misleading information to American Zurich Insurance Company, by way of its third party administrator, Travelers Indemnity Company, specifically, with regard to a workers' compensation policy issued to A&G Staffing Solutions, LLC, in violation of the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to - 30 ("Fraud Act").

2. Defendants' aforementioned conduct constitutes multiple violations of the Fraud Act, and any future violation of the Fraud Act shall be considered a subsequent violation.

3. Defendants agree that they shall not engage in any future violations of the Fraud Act.

4. Defendants shall pay a total Settlement Amount of \$10,000.00 to the Plaintiff ("Settlement Amount"). This Settlement Amount consists of \$8,500.00 in civil penalties pursuant to N.J.S.A. 17:33A-5b; \$1,075.00 in attorneys' fees pursuant to N.J.S.A. 17:33A-5b; and \$425.00 in statutory surcharge pursuant to N.J.S.A. 17:33A-5.1.

5. All communications from any party concerning the subject matter of this Stipulation shall be addressed as follows:

If to the Department:

Richard E. Wegryn, Jr., DAG
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, New Jersey 08625

If to the Defendants:

Vanessa Rodriguez
8707 Tierra Vista Circle
Apt. 201
Kissimmee, Florida 34747

A&G Staffing Solutions, LLC
283 Main Street
West Orange, NJ 07052

6. This Stipulation shall be governed by the laws of the State of New Jersey without regard to any conflict-of-laws principles. The Parties agree that the exclusive jurisdiction and venue for any dispute arising between and among the Parties under this Stipulation will be the Superior Court of the State of New Jersey.

7. Upon receipt of the payments as set forth in Paragraph 4 above, this Stipulation shall act as a dismissal of Plaintiff's complaint as to the Defendants provided the Defendants fully perform under the terms of the Stipulation.

8. The penalties of this Stipulation 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.

9. To facilitate execution, this Agreement may be executed in as many counterparts as may be required. All counterparts hereof shall collectively constitute a single agreement.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

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

Dated: June 26, 2019

By: Richard E. Wehrin, Jr.
Richard E. Wehrin, Jr.
Deputy Attorney General

Dated: June 13, 2019

By: Vanessa Rodriguez
Vanessa Rodriguez

Dated: June 13, 2019

By: Vanessa Rodriguez
Vanessa Rodriguez, President
A&G Staffing Solutions, LLC