

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

By: Ryan S. Schaffer  
Deputy Attorney General  
NJ Attorney ID No. 058152013  
(609)376-2965  
Ryan.Schaffer@law.njoag.gov

SUPERIOR COURT OF NEW JERSEY  
SPECIAL CIVIL PART - MONMOUTH COUNTY  
DOCKET NO. MON-DC-13474-18

\_\_\_\_\_)  
)  
MARLENE CARIDE, COMMISSIONER OF ) Civil Action  
THE NEW JERSEY DEPARTMENT OF )  
BANKING AND INSURANCE, )  
)  
Plaintiff, )  
)  
v. ) STIPULATION OF SETTLEMENT  
)  
)  
KENNETH E. WARCHAL AND KAREN )  
BIANCHINO, )  
)  
Defendants. )  
\_\_\_\_\_)

WHEREAS, Plaintiff Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff"), initiated the instant civil action pursuant to N.J.S.A. 17:33A-1 to -30, against Defendant Karen Bianchino ("Bianchino"); and

WHEREAS, for good cause shown Plaintiff and Bianchino have resolved the issues in controversy and consented to the entry of the within Stipulation of Settlement; and

IT IS HEREBY STIPULATED AND AGREED, that Bianchino admits that she violated N.J.S.A. 17:33A-4c, as pleaded in the Complaint; and

IT IS FURTHER HEREBY STIPULATED AND AGREED, that Bianchino shall pay a total sum of \$12,250 to the Commissioner. This amount consists of a \$5,000 civil penalty for one violation of N.J.S.A. 17:33A-1 to -30; a \$250 statutory surcharge, pursuant to N.J.S.A. 17:33A-5.1; and attorneys' fees of \$7,000, pursuant to N.J.S.A. 17:33A-5(b); and

IT IS FURTHER HEREBY STIPULATED AND AGREED, that upon execution of this Stipulation of Settlement, Bianchino shall remit to the attorney for the Commissioner payment in the amount of \$12,250 by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

Ryan S. Schaffer, Deputy Attorney General  
Banking and Insurance Section  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, New Jersey 08625

IT IS FURTHER HEREBY STIPULATED AND AGREED, that upon final execution of this Settlement, Plaintiff agrees to dismiss this civil action against Bianchino only.

CONSENTED AS TO FORM, CONTENT AND ENTRY OF ORDER:

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

Dated: 9/11/19

By: [Signature]  
Ryan S. Schaffer  
Deputy Attorney General

Dated: 9-10-19

[Signature]  
Karen Bianchino, Defendant

Dated: 9-10-19

[Signature]  
Martha A. Vogt, Esq.  
Attorney to Karen Bianchino