

ANDREW J. BRUCK  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Richard J. Hughes Justice Complex  
P.O. Box 117  
Trenton, New Jersey 08625  
Attorney for Plaintiff

By: Ashleigh B. Shelton  
Deputy Attorney General  
NJ Attorney ID: 294162019  
(609) 376-2965  
[Ashleigh.Shelton@law.njoag.gov](mailto:Ashleigh.Shelton@law.njoag.gov)

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION-BURLINGTON COUNTY  
DOCKET NO. BUR-L-000537-21

MARLENE CARIDE,  
COMMISSIONER OF THE NEW  
JERSEY DEPARTMENT OF  
BANKING & INSURANCE,

Plaintiff,

v.

CALVIN POPE,

Defendant.

Civil Action

**STIPULATION OF SETTLEMENT**

WHEREAS Plaintiff Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), and Defendant Calvin Pope ("Defendant") (collectively "Parties") have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement ("Stipulation").

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 pursuant to the terms and conditions below.

1. Defendant admits that he violated the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30 ("Fraud Act"), specifically, N.J.S.A. 17:33A-4(a)(1), by knowingly providing false and misleading statements to United of Omaha Life Insurance Company by submitting false documents in support of a claim for life insurance benefits.

2. Defendant's aforementioned conduct constitutes one violation of the Fraud Act, and any future violations of the Fraud Act shall be considered second and subsequent violations.

3. Defendant agrees that he shall not engage in any future violations of the Fraud Act.

4. Defendant shall pay a total amount of \$5,750 to the Commissioner ("Settlement Amount"). The Settlement Amount consists of \$5,000 in civil penalties pursuant to N.J.S.A. 17:33A-5(b); \$500 in attorneys' fees pursuant to N.J.S.A. 17:33A-5(b); and \$250 in statutory surcharge pursuant to N.J.S.A. 17:33A-5.1.

5. Defendant shall satisfy the Settlement Amount pursuant to the following terms and conditions:

a. Immediately upon execution of this Stipulation by Defendant, Defendant shall remit to the attorney for the Commissioner a payment in the amount of \$500 by certified check,

official bank check, or money order made payable to the  
"Commissioner, New Jersey Department of Banking and Insurance" and  
sent to:

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

b. Defendant shall remit the remaining balance of \$5,250  
in monthly installment payments of \$145.83 each, to be paid on or  
by the first day of each month, beginning November 1, 2021, until  
the full Settlement Amount has been paid, by certified check,  
official bank check, or money order made payable to the  
"Commissioner, New Jersey Department of Banking and Insurance" and  
sent to:

Rose V. McGill  
Collections Department  
New Jersey Department of Banking and Insurance  
20 West State Street, 10th Floor  
P.O. Box 325  
Trenton, New Jersey 08625

6. In conjunction with the execution of this  
Stipulation, the parties shall also enter into an Order of Entry  
of Judgment by Consent for the entire Settlement Amount, which will  
be docketed with the Superior Court of New Jersey as a statewide  
lien.

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

If to the Commissioner: Ashleigh B. Shelton  
Deputy Attorney General  
Banking and Insurance Section  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, New Jersey 08625

If to Defendant: Calvin Pope  
58 Barrington Lane  
Willingboro, NJ 08046

8. The filing of the fully executed Stipulation shall serve as a Stipulation of Dismissal with Prejudice of the Complaint except for the filing of the Consent Judgment pursuant to paragraph 6 herein.

9. 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 the Stipulation will be the Superior Court of the State of New Jersey.

10. 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.

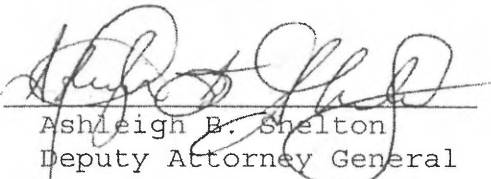
11. Pursuant to N.J.S.A. 17:33A-10(c), a copy of this Stipulation shall be provided to any appropriate licensing authority. This Stipulation can be used in any subsequent civil or criminal proceeding.

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

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

ANDREW J. BRUCK  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff

Dated: 10/5/2021

By:   
Ashleigh B. Shelton  
Deputy Attorney General

Dated: 9/22/21

  
Calvin Pope, Defendant

BURLINGTON COUNTY SUPERIOR COURT

OCT 12 2021

James J. Ferrelli, J.S.C.

ANDREW J. BRUCK  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
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Trenton, New Jersey 08625  
Attorney for Plaintiff

If this is a money judgment or order, it will not be  
Automatically recorded as a statewide lien. To do  
So, forward it directly to the Clerk of the Superior  
Court in Trenton along with a \$35.00 fee.

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COMMISSIONER OF THE NEW )  
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BANKING & INSURANCE, )  
Plaintiff, )  
v. )  
CALVIN POPE, )  
Defendant. )

Civil Action

ORDER OF ENTRY OF JUDGMENT  
BY CONSENT

This matter having been brought before the Court by Andrew J. Bruck, Acting Attorney General of the State of New Jersey, Attorney for Plaintiff, Commissioner of the New Jersey Department of Banking and Insurance, (Ashleigh B. Shelton, Deputy Attorney General, appearing), and the undersigned parties having executed a Stipulation of Settlement and consented to the form and entry of this Order;

IT IS ON THIS 12th day of October, 2021,

ORDERED that Judgment shall be and hereby is entered against Defendant, Calvin Pope, and in favor of Plaintiff, Commissioner of the New Jersey Department of Banking and Insurance, in the amount of \$5,750. This amount shall be paid under the terms of the Stipulation of Settlement. This amount consists of civil penalties in the amount of \$5,000 for one violation of the New Jersey Insurance Fraud Prevention Act pursuant to N.J.S.A. 17:33A-5(b), attorneys' fees in the amount of \$500 pursuant to N.J.S.A. 17:33A-5(b), and a statutory fraud surcharge in the amount of \$250.00 pursuant to N.J.S.A. 17:33A-5.1, which is separate and apart from the civil penalty; and

IT IS FURTHER ORDERED, that a copy of this order shall be served on all parties within 7 days from the date of receipt.

/s/ James J. Ferrelli  
HONORABLE JAMES J. FERRELLI, J.S.C.

CONSENTED AS TO FORM, CONTENT AND ENTRY OF ORDER:

ANDREW J. BRUCK  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff

Dated: 10/5/2021

By: [Signature]  
Ashleigh B. Shelton  
Deputy Attorney General

Dated: 9/22/21

[Signature]  
Calvin Pope, Defendant