

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner of)
Banking and Insurance, State of New Jersey,)
to fine, suspend and/or revoke the insurance)
producer license of Robert Tuffy, Reference)
No. 85190.)

FINAL ORDER

TO: Robert Thomas Tuffy
2027 Barnegat Blvd.,
Point Pleasant, New Jersey 08742

THIS MATTER, having been opened by the Commissioner of Banking and Insurance (“Commissioner”), State of New Jersey, upon issuance of Order to Show Cause No. E19-98 alleging that Respondent, Robert Tuffy (“Tuffy”), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Respondent was licensed as resident insurance producer pursuant to N.J.S.A. 17:22A-32(a), until his license expired on November 30, 2016; and

WHEREAS, Respondent is subject to the provisions of the New Jersey Insurance Producer Licensing Act of 2001, N.J.S.A. 17:22A-26 to -48 (“Producer Act”); and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(d), the Commissioner shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by the Producer Act and Title 17 of the Revised Statutes or Title 17B of the New Jersey Statutes against any person who is under investigation for or charged with a violation of the Producer Act or Title

17 of the Revised Statutes or Title 17B of the New Jersey Statutes even if the person's license or registration has been surrendered or has lapsed by operation of law; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(16), an insurance producer shall not commit any fraudulent act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a)(19), an insurance producer shall not fail to notify the Commissioner within 30 days of the final disposition of any formal disciplinary proceedings initiated against the insurance producer, or disciplinary action taken against the producer, by the Financial Industry Regulatory Authority ("FINRA"), any successor organization, or other similar non-governmental regulatory authority with statutory authority to create and enforce industry standards of conduct, or of any other administrative actions or criminal prosecutions, as required by N.J.S.A. 17:22A-40 and N.J.S.A. 17:22A-47; or fail to supply any documentation the Commissioner may request in connection therewith; and

WHEREAS, pursuant to N.J.S.A. 17:22A-47(c), an insurance producer shall report to the Commissioner any disciplinary action taken against the insurance producer, or any formal disciplinary proceedings initiated against the producer, by FINRA, any successor organization, or other similar non-governmental regulatory authority with statutory authority to create and enforce industry standards of conduct, within 30 days of the final disposition of the matter; and this report shall include a copy of the order, consent order or other relevant legal documents; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40(a), the Commissioner may place on probation, suspend, revoke or refuse to issue or renew an insurance producer's license or may levy a civil penalty in accordance with N.J.S.A. 17:22A-45(c), or may take any combination of actions, for any one or more of the violations listed in N.J.S.A. 17:22A-40(a)(1) through (19); and

WHEREAS, pursuant to N.J.S.A. 17:22A-45(c), any person violating any provision of the Producer Act shall be liable to a penalty not exceeding \$5,000.00 for the first offense and not exceeding \$10,000.00 for each subsequent offense; moreover, the Commissioner may order restitution of moneys owed any person and reimbursement of costs of investigation and prosecution; and

WHEREAS, the Commissioner issued Order to Show Cause E19-98 on October 14, 2019, alleging violations of New Jersey insurance laws by Tuffy as set forth in the following Counts:

COUNT 1

IT APPEARING, that from July 1993 until October 2015, Respondent was associated with various firms registered by FINRA; and

IT FURTHER APPEARING, that on July 27, 2016, FINRA commenced a disciplinary action against Respondent and issued a Letter of Acceptance, Waiver and Consent based on findings that Respondent, while associated with Wells Fargo, executed six trades for a customer, without the customer's authorization; and

IT FURTHER APPEARING, that the Letter of Acceptance, Waiver and Consent suspended Respondent's association with any FINRA member in any capacity for 20 days and imposed a \$5,000 fine; and

IT FURTHER APPEARING, that by executing six trades for a customer, without the customer's authorization, Respondent violated N.J.S.A. 17:22A-40(a)(16); and

COUNT 2

IT FURTHER APPEARING, that Respondent failed to report to the Commissioner within 30 days the FINRA disciplinary action and the July 27, 2016 Letter of Acceptance, Waiver and Consent; and

IT FURTHER APPEARING, that by failing to report to the Commissioner within 30 days the FINRA disciplinary action and the July 27, 2016 Letter of Acceptance, Waiver and Consent, Respondent violated N.J.S.A. 17:22A-40(a)(19), and N.J.S.A. 17:22A-47(c); and

IT FURTHER APPEARING, that as set forth in the certification of service of Garen Gazaryan, Deputy Attorney General, attached hereto as Exhibit "A," Tuffy was given notice of the aforesaid charges and an opportunity to contest the charges at a hearing pursuant to Order to Show Cause E19-98, which was duly served on Tuffy in accordance with N.J.A.C. 11:17D-2.1(a)(3); and

IT FURTHER APPEARING, that Tuffy failed to provide written responses to the charges contained in Order to Show Cause E19-98 within 20 days as provided by N.J.A.C. 11:17D-2.1(d)(1), and therefore Tuffy has waived his right to a hearing to contest these charges and the charges are deemed admitted, pursuant to N.J.A.C. 11:17D-2.1(b)1;

NOW, THEREFORE, IT IS on this 02 day of October, 2020;

ORDERED, that the charges contained in Counts One and Two of Order to Show Cause E19-98 are deemed admitted by Tuffy, pursuant to N.J.A.C. 11:17D-2.1(b)(1); and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-40, and N.J.A.C. 11:17D-2.1(b)(2), the resident insurance producer license of Tuffy is hereby **REVOKED** effective upon the execution of this Final Order by the Commissioner; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-45(c), Tuffy shall pay a civil penalty in the total amount of \$15,000.00 to the Commissioner – \$5,000.00 for the violation stated in Count 1 of the OTSC and \$10,000.00 for the violation stated in Count 2 of the OTSC; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-45(c), Respondent shall be responsible for the reimbursement to the Department of the costs of investigation totaling


\$575.00. A true and exact copy of the Certification of Jared Stewart, Department of Banking and Insurance Investigator, is attached hereto as Exhibit "B"; and

IT IS FURTHER ORDERED, that Respondent shall pay the above penalties and costs to the Commissioner of Banking and Insurance, State of New Jersey, P.O. Box 329, Trenton, New Jersey 08625, Attention: Virgil Downtin, Chief of Investigations, by certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury," within ten days from the date of service of this Order; and

IT IS FURTHER ORDERED, that in the event full payment of the penalty and costs is not made, the Commissioner may exercise any and all remedies available by law, including but not limited to recovery of any unpaid penalties, in accordance with the Penalty Enforcement Law, N.J.S.A. 2A:58-10 to -12; and

IT IS FURTHER ORDERED, that the civil penalty in this Final Order is imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and the protection of the public health, safety and welfare, and is not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding; and

IT IS FURTHER ORDERED, that the provisions of this Final Order represent a final agency decision and constitute a final resolution of the allegations contained in Order to Show Cause No. E19-98 as to Respondent Robert Tuffy.



Marlene Caride
Commissioner

EXHIBIT A

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

By: Garen Gazaryan
Deputy Attorney General
NJ Attorney ID No. 070262013
(609)376-2965
Garen.Gazaryan@law.njoag.gov

Proceedings by the Commissioner of Banking)
and Insurance, State of New Jersey, to fine,)
suspend and/or revoke the insurance producer)
license of Robert Tuffy, Reference No. 85190.)
_____)

**CERTIFICATION OF
GAREN GAZARYAN**

I, Garen Gazaryan, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am a Deputy Attorney General assigned as counsel for the New Jersey Department of Banking and Insurance (“Department”) in the above matter. I submit this certification in support of the Department’s request that a Final Order be entered against Respondent, Robert Tuffy (“Tuffy”), and specifically to establish that proper service of Order to Show Cause No. E19-98 was made upon Tuffy.

2. The Commissioner issued Order to Show Cause No. E19-98 (“Order to Show Cause”) on October 14, 2019.

3. By letter dated October 16, 2019, my office served a copy of the Order to Show Cause on Tuffy via regular and certified mail, return receipt requested, at the following residential address for Tuffy on file with the Department: 2027 Barnegat Blvd., Point Pleasant,

New Jersey 08742. (Attached as Exhibit 1 is a true and correct copy of the October 16, 2019 cover letter).

4. The certified mail was returned to my office with the following notation – “Unclaimed.” (Attached as Exhibit 2 is a copy of the returned certified mail).

5. The regular mail was returned to my office with the following notation – “Return to Sender. Unable to forward.” (Attached as Exhibit 3 is a copy of the returned regular mail).

6. By letter dated January 2, 2020, my office again served a copy of the Order to Show Cause on Tuffÿ via regular and certified mail, return receipt requested, at 2027 Barnegat Blvd., Point Pleasant, New Jersey 08742. (Attached as Exhibit 4 is a true and correct copy of the January 2, 2020 cover letter).

7. The certified mail was returned to my office with the following notation – “Not deliverable as addressed. Unable to forward.” (Attached as Exhibit 5 is a copy of the returned certified mail).

8. The regular mail was returned to my office with the following notation – “Not deliverable as addressed. Unable to forward.” (Attached as Exhibit 6 is a copy of the returned regular mail).

9. On January 17, 2020, I emailed a copy of the Order to Show Cause to Tuffÿ’s personal email address – robtuffÿ35@gmail.com. (Attached as Exhibit 7 is a true and correct copy of the January 17, 2020 email).

10. On February 6, 2020, Investigator Gaston Celi spoke with Tuffÿ over the phone and Tuffÿ advised that he received the Order to Show Cause E19-98 that I served on him by email dated January 17, 2020 to Tuffÿ’s personal email address. (See Inv. Celi Certification, p. 2.)

11. On February 6, 2020, Tuffly emailed Inv. Celi an acknowledgement of Tuffly's receipt of the Order to Show Cause E19-98. (See Inv. Celi Certification, p. 2.)

12. Pursuant to N.J.A.C. 11:17D-2.1(a), Tuffly was lawfully served with the Order to Show Cause on January 17, 2020.

13. Tuffly has not filed or otherwise provided an Answer to the Order to Show Cause within 20 days provided by N.J.A.C. 11:17D-2.1(d)(1). To date, Tuffly has not filed an answer nor requested a hearing to contest the allegations set forth in Order to Show Cause No. E19-98.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Garen Gazaryan

Dated: June 26, 2020

Exhibit 1



PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 117
TRENTON, NJ 08625-0117

GURBIR S. GREWAL
Attorney General

MICHELLE L. MILLER
Director

October 16, 2019

VIA CERTIFIED AND REGULAR MAIL

Robert Thomas Tuffy
2027 Barnegat Blvd.,
Point Pleasant, New Jersey 08742

Re: Proceedings by the Commissioner of Banking and Insurance, State of New Jersey, to fine, and revoke and suspend the insurance producer licenses of Robert Thomas Tuffy, Reference No. 85190

OTSC No. E19-98

Dear Mr. Tuffy:

I represent the New Jersey Department of Banking and Insurance ("Department"). Enclosed, please find Order to Show cause No. E19-98 issued by the Commissioner of the Department on October 14, 2019. The Order to Show Cause charges you with various violations of the insurance laws of the State of New Jersey, and orders you to appear and show cause as to why the producer license should not be suspended or revoked, and why other administrative fines and costs should not be imposed against you.

You have the right to request an administrative hearing in regard to these allegations. Complete instructions on how to request a hearing are contained within the enclosed Order to Show Cause.

Briefly here, a request for hearing must provide a specific statement responding to each charge alleged in the Order to Show Cause, specifically admit or deny each fact



alleged in the Order to Show Cause, identify any facts of which you have no specific knowledge, and identify any defenses intended to be asserted in response to each charge. N.J.A.C. 11:17D-2.1(d). The request for hearing must be received by the Department within twenty (20) days of service of the Order to Show Cause upon you. The request for hearing should be sent to: Virgil Downtin, Chief of Investigations, Department of Banking and Insurance, P.O. Box 329, Trenton, New Jersey 08625; or, faxed to Mr. Downtin's attention at (609) 292-5337. A copy of the request for a hearing shall also be sent to my office at fax number (609)777-3503. If you fail to respond to this Order to Show Cause within the time provided, a Final Order will be issued by the Commissioner.

Thank you for your attention to this matter.

Sincerely yours,

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Garen Gazaryan
Garen Gazaryan
Deputy Attorney General

Enclosure

cc: Gale Simon, Assistant Commissioner (w/encl)
Virgil Downtin, Chief of Investigations (w/encl)
Al Verdel, Supervisor of Investigations (w/encl)
Gaston Celi, Investigator (w/encl)
Richard Wegryn, DAG, Section Chief (w/encl)

Exhibit 2

REGISTERED MAIL™



7012 0470 0002 1125 2466



From **Garen Gazaryan, DAG**
DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

To:

~~Richard J. Hughes~~
Richard Thomas Tuffy

- RETURN TO SENDER
- ATTEMPTED NOT KNOWN
- INSUFFICIENT ADDRESS
- NO SUCH NUMBER
- NO MAIL RECEIPTABLE
- TEMPORARILY AWAY
- M/L/A - UNABLE TO FORWARD
- UNDELIVERABLE AS ADDRESSED

- UNCLAIMED
- DECEASED
- BOX CLOSED
- ILLEGIBLE
- VACANT

1-450
R-114-20

Exhibit 3



From **Garen Gazaryan, DAG**

DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

-R-T-S- 087425302-1N 01/17/20

RETURN TO SENDER
UNABLE TO FORWARD
UNABLE TO FORWARD
RETURN TO SENDER



Handwritten scribbles or initials.

Exhibit 4



PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 117
TRENTON, NJ 08625-0117

GURBIR S. GREWAL
Attorney General

MICHELLE L. MILLER
Director

January 2, 2020

VIA CERTIFIED AND REGULAR MAIL

Robert Thomas Tuffy
2027 Barnegat Blvd.,
Point Pleasant, New Jersey 08742

Re: Proceedings by the Commissioner of Banking and Insurance, State of New Jersey, to fine, and revoke and suspend the insurance producer licenses of Robert Thomas Tuffy, Reference No. 85190

OTSC No. E19-98

Dear Mr. Tuffy:

I represent the New Jersey Department of Banking and Insurance ("Department"). Enclosed, please find Order to Show cause No. E19-98 issued by the Commissioner of the Department on October 14, 2019. The Order to Show Cause charges you with various violations of the insurance laws of the State of New Jersey, and orders you to appear and show cause as to why the producer license should not be suspended or revoked, and why other administrative fines and costs should not be imposed against you.

You have the right to request an administrative hearing in regard to these allegations. Complete instructions on how to request a hearing are contained within the enclosed Order to Show Cause.

Briefly here, a request for hearing must provide a specific statement responding to each charge alleged in the Order to Show Cause, specifically admit or deny each fact



January 2, 2020

Page 2

alleged in the Order to Show Cause, identify any facts of which you have no specific knowledge, and identify any defenses intended to be asserted in response to each charge. N.J.A.C. 11:17D-2.1(d). The request for hearing must be received by the Department within twenty (20) days of service of the Order to Show Cause upon you. The request for hearing should be sent to: Virgil Downtin, Chief of Investigations, Department of Banking and Insurance, P.O. Box 329, Trenton, New Jersey 08625; or, faxed to Mr. Downtin's attention at (609) 292-5337. A copy of the request for a hearing shall also be sent to my office at fax number (609)777-3503. If you fail to respond to this Order to Show Cause within the time provided, a Final Order will be issued by the Commissioner.

Thank you for your attention to this matter.

Sincerely yours,

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Garen Gazaryan
Garen Gazaryan
Deputy Attorney General

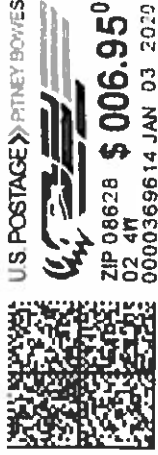
Enclosure

Exhibit 5

STATE OF NEW JERSEY
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
RICHARD J. HUGHES JUSTICE COMPLEX
MARKET & NEW WARREN STREETS
P.O. BOX 117
TRENTON NJ 08625-117



7018 2290 0001 8181 1023



From Caren Gazarian DAG
DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

To: Robert Thomas Tuffy
2027 Barnegat Blvd.,
Point Pleasant, New J

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RETURN TO SENDER
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UNABLE TO FORWARD

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UNPAID

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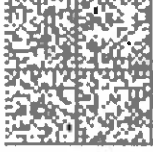
JTF

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Exhibit 6

STATE OF NEW JERSEY
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
RICHARD J. HUGHES JUSTICE COMPLEX
MARKET & NEW WARREN STREETS
P.O. BOX 117
TRENTON NJ 08625-117

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From Caren Gazarvan, DAG
DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

To:

Robert Thomas Tuffy
2027 Barnegat Blvd.,
Point Pleasant, New Jersey 08742

NIXIE: 076 DE 1, 0001/14/20

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

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BC: 08625011717 *0451-04105-03-37

HWD

08625011717
0874234331 CC



Exhibit 7

Garen Gazaryan

From: Garen Gazaryan
Sent: Friday, January 17, 2020 3:18 PM
To: robtuffy35@gmail.com
Subject: Order to Show Cause; Robert Tuffy, E19-98
Attachments: Signed OTSC.pdf; Letter enclosing OTSC.pdf

Dear Mr. Tuffy,

I represent the New Jersey Department of Banking and Insurance ("Department"). Enclosed, please find Order to Show cause No. E19-98 issued by the Commissioner of the Department on October 14, 2019. The Order to Show Cause charges you with various violations of the insurance laws of the State of New Jersey, and orders you to appear and show cause as to why the producer license should not be suspended or revoked, and why other administrative fines and costs should not be imposed against you.

Additionally, please be advised that I attempted twice to send you the attached documents by regular and certified mail to your address at 2027 Barnegat Blvd., Point Pleasant, NJ 08742. Both times, the mails could not be delivered or forwarded.

Please contact me with any questions.

Garen

Garen Gazaryan
Deputy Attorney General
Office of the Attorney General | Division of Law
Banking & Insurance Section
25 Market St. | P.O. Box 117 | Trenton, N.J. 08625
t: (609) 376-2965 | f: (609) 777-3503
Garen.Gazaryan@law.njoag.gov

EXHIBIT B

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

By: **Garen Gazaryan**
Deputy Attorney General
NJ Attorney ID No. 070262013
(609)376-2965
Garen.Gazaryan@law.njoag.gov

Proceedings by the Commissioner of Banking)
and Insurance, State of New Jersey, to fine,)
suspend and/or revoke the insurance producer)
license of Robert Tuffy, Reference No. 85190.)
_____)

**CERTIFICATION OF
GASTON CELI**

I, Gaston Celi, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am employed by the New Jersey Department of Banking and Insurance ("Department"), Enforcement Unit, and hold the title of Investigator.

2. This certification is submitted in support of the Department's application for reimbursement of its costs of investigation and prosecution of this matter, in accordance with N.J.S.A. 17:22A-45(c).

3. On March 17, 2017, I was assigned responsibility for determining whether Respondent Robert Tuffy may have violated provisions of the New Jersey Insurance Producer Licensing Act of 2001, N.J.S.A. 17:22A-26 to -48.

4. To determine the amount of time that I spent on the investigation and prosecution of the referenced licensed producer, I reviewed the files relative to this matter, including time

records. On the basis of this review I have prepared the schedule of costs attached hereto as Exhibit "A."

5. As this schedule reflects, I spent a total of 11.5 hours on the investigation and prosecution of this matter.

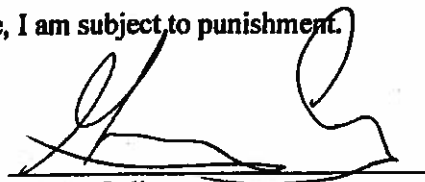
6. Under N.J.A.C. 11:1-32.4(b)(20), costs to the Department for the investigation and prosecution of violations of the Producer Act are reimbursable at the rate of \$50.00 per hour, rounded to the nearest quarter hour.

7. I therefore request that the Department's costs of investigation and prosecution be reimbursed in the amount of \$575.00.

8. On February 6, 2020, I spoke with Respondent Robert Tuffy over the phone and he informed me that he received the Order to Shaw Cause E19-98 served on him by DAG Garen Gazaryan by email dated January 17, 2020 to Robert Tuffy's personal email address.

9. On February 6, 2020, Robert Tuffy emailed me an acknowledgement of his receipt of the Order to Shaw Cause E19-98. (Tuffy's acknowledgment is attached as Exhibit B.)

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Gaston Celi

Dated: 6/26/2020

Exhibit 1



State of New Jersey
 DEPARTMENT OF BANKING AND INSURANCE
 DIVISION OF INSURANCE
 CONSUMER PROTECTION SERVICES
 ENFORCEMENT UNIT
 PO BOX 329
 TRENTON, NJ 08625-0329

PHIL MURPHY
Governor

MARLENE CARIDE
Commissioner

SHEILA OLIVER
Lt. Governor

TEL (609) 292-7272
 FAX (609) 292-5337

Exhibit A

**RECORD OF TIME EXPENDED ON
 INVESTIGATION AND/OR PROSECUTION**

Re: Robert Tuffy
 Department File No.: 277427
 Investigator: Gaston Celi

Date	Time in Hours	Phone	Case Prep	Comments
3/17/2017	3		x	Assigned case, file review and background completed.
3/28/2017	1		x	Investigative Report 1
4/06/2017	1		x	Letter to Respondent.
4/24/2017	.5		x	Investigative Report 2
6/27/2017- 10/16/2017	2	X	x	Respondent's calls; email responses; and review of additional information.
10/16/2017	1.5		x	Drafted Facts and Evidence (F&E) Report
11/27/2017	.5		x	Email and letter mail notice of decision to Respondent.
03/05/2018	.5		x	Consent Order drafted and sent letter.
04/11/2018	1		x	Field visit to hand deliver Consent Order.
05/03/2018	.5		x	Referral Prep to Division of Law
TOTAL: 11.5 hours				

Hours @ \$50 x hrs.	= \$575.00			
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Exhibit 2

Garen Gazaryan

To: Celi, Gaston
Subject: RE: [EXTERNAL] Attorney General

From: Robert Tuffy <robtuffy35@gmail.com>
Sent: Thursday, February 06, 2020 4:31 PM
To: Celi, Gaston <gaston.celi@dobi.nj.gov>
Subject: [EXTERNAL] Attorney General

Good Afternoon,

I acknowledge receiving a letter and document by email from the Deputy Attorney General.

Thank you,

Robert Tuffy