

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 Justin Reynolds 1140733)
) FINAL ORDER
)
)

TO: Justin Reynolds
4 Chaucer Drive
Hackettstown, New Jersey 07840

This matter, having been opened to the Commissioner of Banking and Insurance ("Commissioner"), State of New Jersey, upon information that Justin Reynolds ("Reynolds"), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Respondent Reynolds was a licensed resident insurance producer pursuant to N.J.S.A. 17:22A-32, until his license expired on May 31, 2011; and

WHEREAS, Respondent Reynolds is subject to the provisions of the New Jersey Insurance Producer Licensing Act of 2001 ("Producer Act"), N.J.S.A. 17:22A-26, et seq. and the New Jersey Insurance Fraud Prevention Act ("Fraud Act"), N.J.S.A. 17:33A-1 et seq.; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(2), an insurance producer shall not violate any insurance law; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(4), an

insurance producer shall not improperly withhold, misappropriate, or convert any monies or properties received in the course of doing insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(5), an insurance producer shall not intentionally misrepresent the terms of an actual or proposed insurance contract, policy, or application for insurance; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(8), an insurance producer shall not use fraudulent, coercive, or dishonest practices, or demonstrate incompetence, untrustworthiness or financial irresponsibility in the conduct of insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(10), an insurance producer shall not forge another's name to an application for insurance or to any document related to an insurance transaction; and

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

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

this 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-45c, any person violating any provision of the Producer Act shall be liable to civil penalties not exceeding \$5,000.00 for the first offense and not exceeding \$10,000.00 for each subsequent offense; in addition, the Commissioner may order reimbursement of the costs of investigation and prosecution; and

WHEREAS, pursuant to N.J.S.A. 17:33A-4a(4)(b), a person violates the Fraud Act if a person prepares or makes any written or oral statement, intended to be presented to any insurance company or producer for the purpose of obtaining an insurance policy, knowing that the statement contains any false or misleading information concerning any fact or thing material to an insurance application or contract; and

WHEREAS, pursuant N.J.S.A. 17:33A-5c, violations of the Fraud Act subject the violator to a civil penalty of up to \$5,000.00 for the first offense, \$10,000.00 for the second offense, and \$15,000.00 for each subsequent offense. The court shall also award court costs and reasonable attorney fees; and

WHEREAS, pursuant N.J.S.A. 17:33A-5.1, in addition to

any other penalty, fine or charge imposed pursuant to the law, a person who is found in any legal proceeding to have committed insurance fraud shall be subject to a \$1,000.00 surcharge; and

WHEREAS, pursuant to N.J.A.C. 11:17A-2.8 no insurance producer shall make any misleading representations of any insurance policies or annuity contracts or insurers for the purpose of inducing, or tending to induce, any person to lapse, forfeit, surrender, terminate, retain, or convert any insurance policy or annuity contract, or to take out a policy of insurance or annuity contract with another insurer; and

WHEREAS, pursuant to N.J.A.C. 11:17A-4.8, an insurance producer shall reply, in writing, to any inquiry of the New Jersey Department of Banking and Insurance ("Department") relative to the business of insurance within the time requested in said inquiry, or no later than 15 calendar days from the date the inquiry was made or mailed in cases where no response time is given; and

WHEREAS, the Commissioner issued Order to Show Cause No. E15-121 on December 8, 2015 (hereinafter, the "OTSC"), alleging violations of New Jersey insurance laws by Respondent as set forth in the following Counts:

COUNT 1

(Producer Act Violation)

IT APPEARING, that NA, Respondent

Reynolds' grandmother, had two Metropolitan Life Insurance Company ("MetLife") annuities; and

IT FURTHER APPEARING, that, on January 9, 2010 Respondent Reynolds misled NA into surrendering one of her MetLife annuities, and purchasing a new annuity with American National Insurance Company ("American National"); and

IT FURTHER APPEARING, that Respondent Reynolds requested that NA purchase the annuity with American National because he was employed by Northeast Planning Corporation to sell policies for American National and he would earn a commission on the new annuity; and

IT FURTHER APPEARING, that NA transferred funds in the amount of \$122,464.65 from the annuity with MetLife to American National to purchase the new annuity; and

IT FURTHER APPEARING, that as a result of Respondent Reynolds' conduct, NA suffered surrender charges and penalties, while he benefited by earned commissions; and

IT FURTHER APPEARING that Respondent Reynolds used coercive and dishonest practices in the conduct of insurance business, misrepresented the terms of an actual or proposed insurance contract, in violation of N.J.S.A. 17:22A-40a(2), (5), and (8) and N.J.A.C. 11:17A-2.8; and

COUNT 2

(Producer and Fraud Act Violations)

IT FURTHER APPEARING, that on January 9, 2010, Respondent Reynolds fraudulently submitted an application to American General

Life Insurance Company ("American General") for a Deferred Annuity, with an attachment document providing information regarding primary beneficiaries; and

IT FURTHER APPEARING, that NA's signature on the January 9, 2010 application and documents were forged by Respondent Reynolds, without the consent of NA, in violation of N.J.S.A. 17:22A-40a(2) and (10); and

IT FURTHER APPEARING, that by forging NA's signature on the January 9, 2010 application and documents, Respondent Reynolds prepared or made a written statement that was intended to be presented to an insurance company, knowing that the statement contained false or misleading information concerning any fact or thing material to an insurance application or contract, in violation of N.J.S.A. 17:33A-4a(4)(b); and

COUNT 3

(Producer Act Violation)

IT FURTHER APPEARING, that on January 9, 2010, Respondent Reynolds submitted a letter to MetLife's Annuity Department, stating that the funds in the second MetLife annuity should be transferred to the American General annuity; and

IT FURTHER APPEARING, that Respondent Reynolds forged NA's name, without her approval, to the January 9, 2010 letter, and submitted it to Metlife; and

IT FURTHER APPEARING, that the letter dated January 9, 2010 submitted by Respondent Reynolds to MetLife instructed that any contact regarding the transfer of funds be directed to Respondent Reynolds; and

IT FURTHER APPEARING, that by

submitting a fraudulent letter to MetLife and by forging NA's signature, Respondent Reynolds forged another's name to a document related to an insurance transaction and used fraudulent, coercive, or dishonest practices, and demonstrated his incompetence, untrustworthiness, or financial irresponsibility in the conduct of insurance business in this State, in violation of N.J.S.A. 17:22A-40a(2), (8), (10), and (16); and

COUNT 4

(Producer Act Violation)

IT FURTHER APPEARING, that Respondent Reynolds submitted an annuity withdrawal request on April 9, 2010 in the amount of \$15,000.00 to American General, without the consent of NA; and

IT FURTHER APPEARING, that Respondent Reynolds forged NA's signature on the April 9, 2010 withdrawal request form; and

IT FURTHER APPEARING, that Respondent Reynolds forged another's signature as a witness to NA's signature on the April 9, 2010 withdrawal request form; and

IT FURTHER APPEARING, that as a result of the April 9, 2010 fraudulent request, on April 13, 2010, American General issued a check in the amount of \$15,000.00 to NA; and

IT FURTHER APPEARING, that NA endorsed the April 13, 2010 check and gave it to Respondent Reynolds, with the belief that it would be invested for NA's benefit; and

IT FURTHER APPEARING, that the April 13, 2010 check was then endorsed by Respondent Reynolds and was not invested for the benefit of NA, but rather converted for the benefit of Respondent Reynolds; and

IT FURTHER APPEARING, that by forging the April 9, 2010 withdrawal request in the amount of \$15,000.00 to American General, without the consent of NA, and endorsing the April 13, 2010 check and using it for his own personal benefit, Respondent Reynolds forged another's name to a document related to an insurance transaction, and used fraudulent, coercive, or dishonest practices, and demonstrated his incompetence, untrustworthiness, or financial irresponsibility in the conduct of insurance business in this State, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10) and (16); and

COUNT 5

(Producer Act Violation)

IT FURTHER APPEARING, that Respondent Reynolds submitted an annuity withdrawal request on April 27, 2010 in the amount of \$8,000.00 to American National, without the consent of NA; and

IT FURTHER APPEARING, that Respondent Reynolds forged NA's signature on the April 27, 2010 withdrawal request form; and

IT FURTHER APPEARING, that the total amount of the withdrawal including surrender charges and tax withholdings was \$9,834.08; and

IT FURTHER APPEARING, that as a result of the April 27, 2010 fraudulent request, on April 29, 2010, American National issued a check in the amount of \$8,000.00 to NA; and

IT FURTHER APPEARING, that NA endorsed the April 29, 2010 check and gave it to Respondent Reynolds, with the belief that it would be invested for NA's benefit; and

IT FURTHER APPEARING, that the April 29, 2010 check was then endorsed by

Respondent Reynolds and was not invested for the benefit of NA, but rather converted for the benefit of Respondent Reynolds; and

IT FURTHER APPEARING, that by forging the April 27, 2010 withdrawal request in the amount of \$8,000.00 to American National, without the consent of NA, and endorsing the April 29, 2010 check and using it for his own personal benefit, Respondent Reynolds forged another's name to a document related to an insurance transaction, and used fraudulent, coercive, or dishonest practices, and demonstrated his incompetence, untrustworthiness, or financial irresponsibility in the conduct of insurance business in this State, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10), and (16); and

COUNT 6

(Producer Act Violation)

IT FURTHER APPEARING, that Respondent Reynolds submitted an annuity withdrawal request on June 18, 2010 in the amount of \$10,000.00 to American General, without the consent of NA; and

IT FURTHER APPEARING, that Respondent Reynolds forged NA's signature on the June 18, 2010 withdrawal request form; and

IT FURTHER APPEARING, that the total amount of the withdrawal including surrender charges and tax withholdings was \$12,354.05; and

IT FURTHER APPEARING, that as a result of the June 18, 2010 fraudulent request, American National issued a check in the amount of \$10,000.00 on June 21, 2014 to NA; and

IT FURTHER APPEARING, that NA endorsed the June 21, 2010 check and gave it to Respondent Reynolds, with the belief that it

would be invested for NA's benefit; and

IT FURTHER APPEARING, that the June 21, 2010 check was then endorsed by Respondent Reynolds and was not invested for the benefit of NA, but rather converted for the benefit of Respondent Reynolds; and

IT FURTHER APPEARING, that by forging the June 18, 2010 withdrawal request in the amount of \$10,000.00 to American General, without the consent of NA, and endorsing the June 21, 2010 check and using it for his own personal benefit, Respondent Reynolds forged another's name to a document related to an insurance transaction and used fraudulent, coercive, or dishonest practices, and demonstrated his incompetence, untrustworthiness, or financial irresponsibility in the conduct of insurance business in this State, in violation of N.J.S.A. 17:22A-40a(2), (4), (8), (10), and (16); and

COUNT 7

(Producer Act Violations)

IT FURTHER APPEARING, that Respondent Reynolds failed to respond to the Department's inquiries on September 27, 2012 and October 17, 2012 within seven (7) calendar days from date of receipt; and

IT FURTHER APPEARING, that the September 27, 2012 and October 17, 2012 inquiries by the Department were sent via certified and regular mail to Respondent Reynolds requesting him to provide a statement with respect to the allegations made by NA; and

IT FURTHER APPEARING, that on October 24, 2012, the Department emailed Respondent Reynolds' prior attorney, Gary Moylen, Esq., who represented Respondent Reynolds in a matter filed in Superior Court of New Jersey, Law Division, Warren County, which

arose out of the same issues pertaining NA's annuities; and

IT FURTHER APPEARING, that neither Respondent Reynolds nor Mr. Moylen responded to the Department's email; and

IT FURTHER APPEARING, that on December 12, 2012 and December 14, 2012, the Department sent Mr. Moylen two separate emails advising him that a response to the previous requests have not been forthcoming and requested a response; and

IT FURTHER APPEARING, that neither Respondent Reynolds nor Mr. Moylen responded to the Department's emails; and

IT FURTHER APPEARING, that on January 7, 2013 the Department sent a letter first class and certified mail to Mr. Moylen and copied Respondent Reynolds, detailing the attempted communications; and

IT FURTHER APPEARING, that Respondent Reynolds did not respond; and

IT FURTHER APPEARING, that on January 16, 2014, the Department spoke to Respondent Reynolds who stated that a response to the previous requests would be received on or before January 21, 2013; and

IT FURTHER APPEARING, that Respondent Reynolds did not provide a response by January 21, 2013; and

IT FURTHER APPEARING, that on January 28, 2013 the Department sent a letter first class and certified mail to Respondent Reynolds and copied Mr. Moylen referencing the January 16, 2013 conversation with Respondent Reynolds; and

IT FURTHER APPEARING, that on January 23, 2013, the Department received an email

from Mr. Moylen explaining his attempts to communicate with Mr. Reynolds and which had been met with no response; and

IT FURTHER APPEARING, that on February 5, 2013, the Department received a letter from Mr. Moylen stating that he had requested Respondent Reynolds to provide a response to the numerous requests made to him; and

IT FURTHER APPEARING, that no response has been received and Respondent Reynolds has failed to respond to the Department's inquiries and that the actions and conduct on the part of Respondent Reynolds, as set forth above, violates N.J.S.A. 17:22A-40a(2) and (8); and N.J.A.C. 11:17A-4.8; and

IT FURTHER APPEARING that as set forth in the Certification of Service of Joseph E. Snow, Deputy Attorney General, attached hereto as Exhibit 1, Respondent was given notice of the aforesaid charges and an opportunity to contest the charges at a hearing pursuant to Order to Show Cause No. E15-121, which was duly sent by certified and regular mail to the address listed in this Final Order in accordance with N.J.A.C. 11:17D-2.1(a)3; and

IT FURTHER APPEARING that as set forth in the Certification of Service of Joseph E. Snow, Deputy Attorney General, attached hereto as Exhibit 1, under cover letter dated December 10, 2015, Order to Show Cause No. E15-121 was sent by certified and regular mail to the address listed in the Order to

Show Cause, and the mailing was successfully delivered to Respondent Reynolds at 4 Chaucer Drive, Hackettstown, New Jersey 07840 as evidenced by the fact that the regular mailing was not returned by the U.S. Postal Service and the certified mail was returned as unclaimed; and

IT FURTHER APPEARING that, although due notice of the charges provided an opportunity to oppose the allegations, Respondent failed to provide a written response to the charges contained in Order to Show Cause No. E15-121 within 20 days as provided by N.J.A.C. 11:17D-2.1(d), and therefore Respondent 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); and

NOW, THEREFORE, IT IS on this 1st day of July , 2016:

ORDERED that the charges contained in Counts 1 through 7 in Order to Show Cause No. E15-121 are deemed admitted by Respondent 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 expired resident insurance producer license of Respondent Justin D. Reynolds is hereby **REVOKED** effective upon the execution of this Final Order by the Commissioner; and

IT IS FURTHER ORDERED that Respondent Justin D. Reynolds shall be responsible for a payment to the Commissioner of \$60,000.00 in civil penalties, pursuant to N.J.S.A. 17:22A-45c and N.J.S.A. 17:33A-5c, for violations of the Producer and Fraud Acts contained in Order to Show Cause No. E15-121. This amount determined as follows:

- a. \$5,000.00 in civil penalties for the violations of the Producer Act described in Count 1 of Order to Show Cause No. E15-121 for using coercive and dishonest practices in the conduct of insurance business and misrepresenting the terms of an actual or proposed insurance contract; and
- b. \$5,000.00 in civil penalties for the violations of the Producer Act and \$5,000.00 in civil penalties for the violation of the Fraud Act described in Count 2 of Order to Show Cause No. E15-121 for presenting an application to American General with Respondent's forged signature; and
- c. \$10,000.00 in civil penalties for the violations of the Producer Act described in Count 3 of Order to Show Cause No. E15-121 for submitting a fraudulent letter and forging NA's signature; and
- d. \$10,000.00 in civil penalties for the violations of the Producer Act described in Count 4 of Order to Show Cause No. E15-121 for misappropriation of funds and fraudulent and dishonest business practices; and
- e. \$10,000.00 in civil penalties for the violations of the Producer Act described in Count 5 of Order to Show Cause No. E15-121 for misappropriation of funds and fraudulent and dishonest business practices; and
- f. \$10,000.00 in civil penalties for the violations of the Producer Act described in Count 6 of Order

to Show Cause No. E15-121 for misappropriation of funds and fraudulent and dishonest business practices; and

- g. \$5,000.00 in civil penalties for the violations of the Producer Act described in Count 7 of Order to Show Cause No. E15-121 for failure to appear and provide documents under subpoena; and

IT IS FURTHER ORDERED that Respondent shall pay the above civil penalties in full by remitting payment by certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury;" and

IT IS FURTHER ORDERED that, pursuant to N.J.S.A. 17:22A-45c and N.J.A.C. 11:1-32.4(b)20, Respondent shall reimburse the Department of Banking and Insurance for the costs associated with the investigation of this matter, as evidenced by the Certification of Supervising Investigator Al Verdel, attached hereto as Exhibit 2, totaling \$2,987.50, by means of a certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury;" and

IT IS FURTHER ORDERED that, pursuant to N.J.S.A. 17:33A-5c, Respondent shall pay attorneys' fees totaling \$5,527.50, as evidenced by the Certification of Deputy Attorney General Joseph E. Snow, attached hereto as Exhibit 1, made payable by certified check, cashier's check or money order to the "Commissioner, New Jersey Department of Banking and

Insurance;" and

IT IS FURTHER ORDERED that, pursuant to N.J.S.A. 17:33A-5.1, Respondent shall pay a surcharge in the amount of \$1,000.00 made payable by certified check, cashier's check or money order to the "State of New Jersey, General Treasury" for violating the Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq.; and

IT IS FURTHER ORDERED that payment of the above civil penalties, costs of investigation, attorneys' fees and insurance fraud surcharge totaling and amounting to **\$69,515.00** shall be remitted to the Commissioner of Banking and Insurance, State of New Jersey, 20 West State Street. P.O. Box 329, Trenton, New Jersey 08625, Attention: Virgil Downtin, Chief of Investigations, within ten (10) days from the date of service of this Final Order; and

IT IS FURTHER ORDERED that in the event full payment of the civil penalties, attorneys' fees, insurance surcharge and investigative costs are 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 et seq.; and

IT IS FURTHER ORDERED that the fines in this Final Order are 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 are 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. E15-121.



Peter L. Hartt
Director of Insurance

EXHIBIT 1

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

By: Joseph E. Snow
Deputy Attorney General
(609) 984-8469
NJ Attorney ID: 041232009
joseph.snow@dol.lps.state.nj.us

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

Proceeding by the Commissioner of Banking and Insurance, State of New Jersey, to fine, suspend and/or revoke the insurance producer license of Justin Reynolds 1140733)
) CERTIFICATION OF DEPUTY ATTORNEY GENERAL JOSEPH E. SNOW

I, Joseph E. Snow, 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 Commissioner of Banking and Insurance, State of New Jersey, ("the Commissioner"), in the above-captioned matter. I submit this certification in support of the Commissioner's request that a Final Order be entered against Justin Reynolds ("Respondent Reynolds") for failure to respond to Order to Show Cause No. E15-121 issued by the Commissioner on December 8, 2015.

2. On December 8, 2015, the Commissioner issued Order to Show Cause No. E15-121 against Respondent Reynolds charging him

with violations of the insurance laws of the State of New Jersey.

3. Under cover letter dated December 10, 2015, our office served Respondent Reynolds with Order to Show Cause No. E15-121 by certified mail, return receipt requested, and regular mail at 4 Chaucer Drive, Hackettstown, New Jersey 07840.

4. Respondent Reynolds was successfully served at 4 Chaucer Drive, Hackettstown, New Jersey 07840 as evidenced by the fact that the regular mailing was not returned by the U.S. Postal Service and the certified mail was returned as unclaimed [A true and exact copy of the U.S. Postal Service's receipt and copy of the envelope indicating that Respondent Reynolds did not claim the certified mail is attached as Exhibit A].

5. The successful service of the Order to Show Cause on Respondent Reynolds provided Respondent Reynolds with an opportunity to contest the charges of Order to Show Cause No. E15-121 at a hearing, and required that Respondent must file with the Commissioner an Answer to the charges of the Order to Show Cause, including a Request for a Hearing, within twenty (20) days of service of the Order to Show Cause upon Respondent, as provided by N.J.A.C. 11:17D-2.1(d).

6. To date, Respondent Reynolds has failed to provide any written response to the charges contained in Order to Show Cause No. E15-121.

7. Court costs and reasonable attorneys' fees are

mandated by the Fraud Act. N.J.S.A. 17:33A-5C. The New Jersey Department of Law and Public Safety, Division of Law ("DOL") has established a Schedule of Attorneys' Fees that provides a uniform hourly rate of compensation for DOL legal staff. [A true and exact copy of the schedule is attached as Exhibit B].

8. DOL legal staff complete daily timesheets which document the legal services performed. For each matter, the DOL timekeeping system requires the activity date, an activity code, and the time spent for each particular activity. The client activity codes are designated as follows:

CAD - Administration	CMB - Motion/Brief
CAP - Appearance	CMS - Miscellaneous
CCM - Conference/Meeting/ Telephone	CPR - Prep Trial/Hearing/ Argument
CCR - Correspondence	CRW - Research/Writing
CDR - Contract/Document Review	CSP - Supervision
CDS - Discovery	CTL - Travel
CIV - Investigation	

9. I have reviewed timekeeping records and documentation in the file to determine the amount of time expended by myself and other DOL legal staff on the matter. The Plaintiff is seeking compensation for the legal services provided by Assistant Section Chief, Joseph E. Snow, Paralegal, Kristine Chichester and Deputy Attorney General Kristina Cretella.

10. The hourly rate of compensation for paralegals is \$75.00 per hour. The work Paralegal Chichester performed in this matter is not duplicative of the time billed by Assistant Section

Chief Snow or Deputy Attorney General Cretella.

11. As an attorney with six (6) to ten (10) years of legal experience, the hourly rate of compensation for Assistant Section Chief Snow is \$235.00 per hour. As an attorney with under five (5) years of legal experience, the hourly rate of compensation for Deputy Attorney General Cretella is \$200.00 per hour.

12. Assistant Section Chief Snow spent a total of 5.5 hours in the supervision of the matter. Paralegal Chichester spent a total of 9 hours in the preparation of this matter. Deputy Attorney General Cretella spent a total of 17.8 hours in the review, preparation, and prosecution of this matter. Accordingly, the Commissioner seeks compensation for all of the time, for a total of \$5,527.50 in legal services, pursuant to N.J.S.A. 17:33A-5b. [A true and exact copy of the timekeeping statements for these services is attached as Exhibit C].

13. The Commissioner also seeks reimbursement of costs of investigation, totaling \$2,987.50, pursuant to N.J.S.A. 17:22A-45c. See Certification of Supervising Investigator Verdel ¶¶ 5-6.

14. Pursuant to N.J.S.A. 17:33A-5.1, in addition to any other penalty, fine or charge imposed, a person who is found in any legal proceeding to have committed insurance fraud shall be subject to a statutory fraud surcharge in the amount of \$1,000.00.

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.



Joseph E. Snow
Deputy Attorney General

Dated: June 28, 2016

EXHIBIT A

KRISTINA CRETELLA, DAG
 State of NJ, Div. of Law
 P.O. Box 117
 Trenton, NJ 08625-0117

Check type of mail or service:
 Certified
 COD
 Delivery Confirmation
 Express Mail
 Insured
 Recorded Delivery (International)
 Registered
 Return Receipt for Merchandise
 Signature Confirmation

Affix Stamp Here
 (If issued as a certificate of mailing, or for additional copies of this bill) Postmark and Date of Receipt

Article Number

Address (Name, Street, City, State, & ZIP Code)

Postage

Fee

Handling Charge

Actual Value if Registered

Insured Value

Dues Sender if COD

DC Fee

SC Fee

SH Fee

RD Fee

RR Fee

1. 7013 1710 0000 7968
 7136

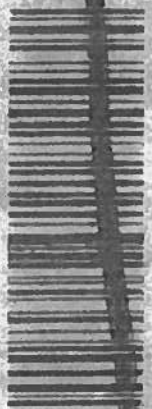
Justin Reynolds
 4 Chaucer Drive
 Hackettstown, NJ 07840



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3.																			
4.																			
5.																			
6.																			
7.																			
8.																			

Total Number of Pieces Listed by Sender: 1
 Total Number of Pieces Received at Post Office: 1
 Postmaster: [Signature]
 Post Office Name of receiving employee(s): [Signature]

7013 1710 0800 7958 7136



US POSTAGE
ZIP 08625 \$1
07 18
NOV 19 2011 09:11

12-11

DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW PO BOX 117 TRENTON, NJ 08625

Justin Reym
4 Chaucer
Rackettsld

RETURN TO SENDER

 UNDELIVERABLE AS ADDRESSED
 ATTEMPTED NOT KNOWN
 INSUFFICIENT ADDRESS
 NO MAIL RECEIPT
 TEMPORARILY AWAY
 NO SUCH NUMBER
 NO SUCH STREET
 IN DISPUTE
 BOX CLOSED
 MLNA - UNABLE TO FORWARD
 UNCLAIMED
 REUSED
 ILLEGIBLE
 DAMAGED

1ST NOTICE
2ND NOTICE
FINAL NOTICE

12/12
112

EXHIBIT B

SCHEDULE OF ATTORNEY FEES
HOURLY RATE OF COMPENSATION FOR LEGAL STAFF

Michelle L. Miller, Acting Director, Division of Law has determined that effective September 1, 2015, the uniform rate of compensation in cases where the State is entitled to recovery of fees be and hereby is amended as follows:

PARALEGAL\$75 per hour

LAW ASSISTANT\$150 per hour

DEPUTY ATTORNEY GENERAL\$200 per hour
(0-5 years of legal experience)

DEPUTY ATTORNEY GENERAL\$235 per hour
(6-10 years of experience)

DEPUTY/ASSISTANT ATTORNEY GENERAL\$260 per hour
(11-20 years of experience)

DEPUTY/ASSISTANT ATTORNEY GENERAL\$300 per hour
(more than 20 years of experience)

EXHIBIT C

DIVISION OF LAW TIMEKEEPING SYSTEM
INFORMATION FOR ONE MATTER
FOR THE PERIOD 01/01/2014 TO 06/01/2016

MATTER NUMBER: 14-63067
MATTER NAME: REYNOLDS, JUSTIN D.

	TIME
CHICHESTER, KRISTINE (PARA.)	9.0
CRETELLA, KRISTINA	17.8
SNOW, JOSEPH	5.5
MATTER TOTAL:	32.3

TIMEPRTMA2

DIVISION OF LAW TIMEKEEPING SYSTEM

TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

06/02/2016

DAG: 144 SNOW, JOSEPH

ACT DATE: 07/28/2014

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CSP	.9	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

DESC: REVIEW FILE/ASSIGNMENT MEMO

TOTAL: .9

DAG: 144 SNOW, JOSEPH

ACT DATE: 06/18/2015

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CSP	.3	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

DESC: REVIEW/EDIT OTSC

TOTAL: .3

DAG: 144 SNOW, JOSEPH

ACT DATE: 06/22/2015

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CSP	.6	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

DESC: REVIEW/EDIT OTSC

TOTAL: .6

TIMEPRTMAZ

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

06/02/2016

DAG: 144 SNOW, JOSEPH

ACT DATE: 09/25/2015

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CSP	2.7	14-63067	REYNOLDS, JUSTIN D.	INS	

TOTAL: 2.7

DESC: REVIEW/EDIT OTSC - REYNOLDS

DAG: 144 SNOW, JOSEPH

ACT DATE: 10/22/2015

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CSP	1.0	14-63067	REYNOLDS, JUSTIN D.	INS	

TOTAL: 1.0

DESC: REVIEW/EDIT OTSC

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 08/08/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	.7	14-63067	REYNOLDS, JUSTIN D.	INS	

TOTAL: .7

DESC: REVIEWED FILE. CONTACTED SUPERIOR COURT OF NJ LAW DIV. WARREN COUNTY TO FIND OUT STATUS OF THAT CASE.

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT
FOR THE PERIOD 01/01/2014 TO 06/01/2016

TIMEPR2MA2

ACT DATE: 08/15/2014

DAG: 708 CRETELLA, KRISTINA

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	4.0	14-63067	REYNOLDS, JUSTIN D.	INS	
CCM	.6	14-63067	REYNOLDS, JUSTIN D.	INS	

TOTAL: 4.6

ACT DATE: 08/18/2014

DAG: 708 CRETELLA, KRISTINA

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	2.2	14-63067	REYNOLDS, JUSTIN D.	INS	
CCM	.1	14-63067	REYNOLDS, JUSTIN D.	INS	

TOTAL: 2.3

ACT DATE: 08/20/2014

DAG: 708 CRETELLA, KRISTINA

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

DAG: 708 CRETELLA, KRISTINA ACT DATE: 08/20/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	1.5	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: EMAIL AND TELEPHONE DISCUSSIONS WITH INVESTIGATOR MINTCHWARNER; REVISING OTSC; ORGANIZING FILE; RECEIVED ADDITIONAL DOCUMENTS FROM INVESTIGATOR MINTCHWARNER

TOTAL: 1.5

DAG: 708 CRETELLA, KRISTINA ACT DATE: 08/21/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	.3	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: CALLED INVESTIGATOR MINTCHWARNER; REVIEWING OTSC.

TOTAL: .3

DAG: 708 CRETELLA, KRISTINA ACT DATE: 08/22/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	.1	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: EMAILED INVESTIGATOR MINTCHWARNER

TOTAL: .1

TIMEPRTMA2

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

06/02/2016

DAG: 708 CRETELLA, KRISTINA ACT DATE: 08/27/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CAD	.1	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: REVIEWED CASE STATUS TO INFORM ASSISTANT SECTION CHIEF SNOW.

TOTAL: .1

DAG: 708 CRETELLA, KRISTINA ACT DATE: 08/29/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	.4	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: DISCUSSED CASE WITH ASSISTANT SECTION CHIEF SNOW; EMAILED INVESTIGATOR MINTCHWARNER

TOTAL: .4

DAG: 708 CRETELLA, KRISTINA ACT DATE: 09/02/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	.1	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: EMAIL DISCUSSION WITH INVESTIGATOR MINTCHWARNER

TOTAL: .1

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT
FOR THE PERIOD 01/01/2014 TO 06/01/2016

TIMEPRTMA2

ACT DATE: 09/08/2014

DAG: 708 CRETELLA, KRISTINA

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	.3	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: EMAIL TO INVESTIGATOR MINTCHWARNER; SENT INVESTIGATOR ORIGINAL FILE.

TOTAL: .3

ACT DATE: 09/15/2014

DAG: 708 CRETELLA, KRISTINA

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	.2	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: EMAILED INVESTIGATOR; UPDATED CASE NOTES

TOTAL: .2

ACT DATE: 09/30/2014

DAG: 708 CRETELLA, KRISTINA

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	.5	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: REVIEWED EMAILS AND ATTACHMENTS FROM INVESTIGATOR MINTCHWARNER WHICH WILL BE INCORPORATED INTO OTSC (APPROX 15 ATTACHMENTS).

TOTAL: .5

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

DAG: 708 CRETELLA, KRISTINA ACT DATE: 10/07/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	3	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: EMAIL CONVERSATION WITH INVESTIGATOR MINTCHWARNER REGARDING POSSIBLE FRAUD WITH LINCOLN BENEFITS

CRW	1.6	14-63067	REYNOLDS, JUSTIN D.	INS	
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DESC: REVIEWED ADDITIONAL DOCUMENTS FORWARDED TO ME FROM INVESTIGATOR MINTCHWARNER FROM METLIFE AND REVISED OTSC

TOTAL: 1.9

DAG: 708 CRETELLA, KRISTINA ACT DATE: 10/08/2014

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	.2	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: MADE A FEW FINAL REVISIONS TO OTSC; COMPLETED DRAFT AND WILL GIVE TO ASC SNOW FOR REVIEW.

TOTAL: .2

DAG: 708 CRETELLA, KRISTINA ACT DATE: 06/16/2015

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CCM	.3	14-63067	REYNOLDS, JUSTIN D.	INS	

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 06/16/2015

TOTAL: .3

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 09/25/2015

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CRW	.5	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

DESC: DISCUSSED OTSC WITH ASC SNOW

TOTAL: .5

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 10/19/2015

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CRW	.4	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

DESC: EDITED OTSC.

TOTAL: .4

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 10/21/2015

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CRW	.5	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

TIMEPR2MA2

DIVISION OF LAW TIMEKEEPING SYSTEM

TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

06/02/2016

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 10/21/2015

TOTAL: .5

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 11/23/2015

ACT				
CODE	TIME	MATTER	MATTER NAME	BILL
CRW	.3	14-63067	REYNOLDS, JUSTIN D.	CODE
				INS

BILL	BILL
CODE	SUBCODE
INS	

TOTAL: .3

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 11/24/2015

ACT				
CODE	TIME	MATTER	MATTER NAME	BILL
CRW	.5	14-63067	REYNOLDS, JUSTIN D.	CODE
				INS

BILL	BILL
CODE	SUBCODE
INS	

TOTAL: .5

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 11/25/2015

ACT				
CODE	TIME	MATTER	MATTER NAME	BILL
CRW	.3	14-63067	REYNOLDS, JUSTIN D.	CODE
				INS

BILL	BILL
CODE	SUBCODE
INS	

TIMEPRTMA2

DIVISION OF LAW TIMEKEEPING SYSTEM

TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

06/02/2016

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 11/25/2015

TOTAL: .3

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 12/10/2015

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CRW	.3	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

DESC: RECEIVED SIGNED OTSC; SERVED.

TOTAL: .3

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 01/19/2016

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CAD	.2	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

DESC: RECEIVED MAIL AND FILED.

TOTAL: .2

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 02/04/2016

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CCM	.2	14-63067	REYNOLDS, JUSTIN D.	CODE	SUBCODE				
				INS					

TIMEPRTMA2

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

06/02/2016

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 02/04/2016

TOTAL: .2

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 03/02/2016

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CRW	.6	14-63067	REYNOLDS, JUSTIN D.	CODE	CODE				
				INS	INS				

DESC: REVIEWING STATUS OF CASE AND DRAFTED CASE UPDATE.

TOTAL: .6

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 05/11/2016

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
CAD	.3	14-63067	REYNOLDS, JUSTIN D.	CODE	CODE				
				INS	INS				

DESC: CHECKED ACMS AND FILE FOR CASE STATUS/UPDATE. DEFENDANT HAS NOT FILED AN ANSWER TO DATE.

TOTAL: .3

DAG: 708 CRETELLA, KRISTINA

ACT DATE: 06/01/2016

ACT									
CODE	TIME	MATTER	MATTER NAME	BILL	BILL				
				CODE	CODE				
				INS	INS				

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

FOR THE PERIOD 01/01/2014 TO 06/01/2016

DAG: 708 CRETELLA, KRISTINA ACT DATE: 06/01/2016

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CAD	.2	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: DISCUSSED CASE WITH PARALEGAL

TOTAL: .2

DAG: U56 CHICHESTER, KRISTINE (PARA.) ACT DATE: 05/18/2016

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	4.7	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: STARTED DRAFTING FINAL ORDER

TOTAL: 4.7

DAG: U56 CHICHESTER, KRISTINE (PARA.) ACT DATE: 05/19/2016

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	3.5	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: CONTINUED FINAL ORDER & DRAFTED CERT OF SERVICE & COST CERT

TOTAL: 3.5

DIVISION OF LAW TIMEKEEPING SYSTEM
TIMESHEET REPORT

06/02/2016

FOR THE PERIOD 01/01/2014 TO 06/01/2016

DAG: U56 CHICHESTER, KRISTINE (PARA.)

ACT DATE: 05/20/2016

ACT CODE	TIME	MATTER	MATTER NAME	BILL CODE	BILL SUBCODE
CRW	.8	14-63067	REYNOLDS, JUSTIN D.	INS	

DESC: CALLS TO FIND OUT WHO NEW INVESTIGATOR IS, CHANGED CERT & EMAILED; MADE SOME CHANGES TO FINAL ORDER

TOTAL: .8

MATTER TOTAL: 32.3

EXHIBIT 2

FINAL ORDER NO.
EXHIBIT 2

Proceeding by the Commissioner of)
Banking and Insurance, State of New) CERTIFICATION OF COSTS
Jersey, to fine, suspend and/or revoke) BY SUPERVISING
the insurance producer license of) INVESTIGATOR
Justin Reynolds 1140733.) AL VERDEL

I, Al Verdel, 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 supervising investigator with the New Jersey Department of Banking and Insurance, Division of Enforcement and Consumer Protection ("Department").

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

3. On or about August 6, 2012, former investigator Natalie Mintchwarner was assigned responsibility for conducting an investigation to determine whether Justin Reynolds may have violated certain provisions of the New Jersey Producer Licensing Act of 2001, N.J.S.A. 17:22A-26, et seq., and related insurance regulations.

4. To determine the amount of time that former investigator Natalie Mintchwarner spent in the investigation and

prosecution of this matter, I reviewed my files relative to this matter, including my time records. On the basis of this review, I have prepared the below schedule of costs attached hereto as Exhibit A.

5. As this schedule reflects, the investigative efforts expended by the Department of Insurance concerning this matter total 59 hours and 45 minutes. Pursuant to N.J.A.C. 11:1-32.4(b)(20), costs to the Department for the investigation and prosecution for violations of the New Jersey Insurance Producer Licensing Act, N.J.S.A. 17:22A-40, are reimbursable at the rate of \$50.00 per hour, rounded to the nearest quarter hour.

6. I therefore request that the Department's costs of investigation and prosecution be reimbursed in the amount of \$2,987.50.

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



Al Verdel
Supervising Investigator

Dated: 6-2-16

Exhibit A

DATE	TIME IN HRS.	PHONE	CASE PREP.	COMMENTS
08/07/12	2		X	Review file
08/07/12	.50	X		Asst. Prosecutor Competello
08/07/12	.50	X		Melissa Fehr, Detective
08/07/12	.25		X	Update SBS
08/13/12	.50	X		Carol Seekamp
08/13/12	.50	X		Melissa Fehr, Detective
08/13/12	.25		X	Update SBS
08/13/12	.25		X	Review email from Melissa Fehr, Detective
08/21/12	1.5		X	Prepare Investigative Report
08/30/12	.25		X	Update SBS
08/30/12	.25		X	Review email from Melissa Fehr, Detective
09/20/12	.25		X	Email to Melissa Fehr, Detective and review reply
09/21/12	.25		X	Email to Melissa Fehr, Detective and review reply
09/21/12	.25		X	Update SBS
09/24/12	.25		X	Email to Carol Seekamp, BFD
09/24/12	.25		X	Prepare Memo to Chief Downtin
09/27/12	1		X	Prepare & Mail letter to Reynolds
09/27/12	.25		X	Update SBS
10/02/12	.25	X		Nancy Applegate
10/03/12	.25	X		Nancy Applegate
10/04/12	.25	X		Nancy Applegate
10/12/12	.25	X		Nancy Applegate
10/15/12	.25	X		Nancy Applegate
10/15/12	.50	X		James Fish, American National
10/15/12	.25		X	Update SBS
10/15/12	1		X	Prepare and mail letter to Nancy Applegate
10/17/12	.50		X	Prepare & Mail letter to Reynolds
10/17/12	.25		X	Update SBS
10/22/12	1	X		Mallone
10/22/12	.25		X	Email to David Norris, Esq.
10/23/12	.25		X	Update SBS
10/24/12	.25		X	Email to David Norris and review reply
10/24/12	1		X	Review complaint filed by Nancy Applegate and exhibits
10/24/12	.25		X	Review email from David Norris
10/24/12	1		X	Review Reynolds response to Applegate complaint
10/24/12	.25		X	Email to Gary Moylan, Esq.
10/25/12	.25	X		Justin Reynolds
11/07/12	.25	X		Justin Reynolds
11/07/12	.25		X	Email to David Norris and review reply
11/07/12	.50		X	Email to Gary Moylan, Esq.
11/07/12	2		X	Prepared Investigative Report
11/07/12	.25		X	Update SBS
11/08/12	.25		X	Email to David Norris and review reply
11/08/12	.25		X	Update SBS
11/09/12	.25		X	Email to David Norris and review reply
11/14/12	4		X	Prepare Factual and Evidence Summary and exhibits
11/14/12	.25		X	Update SBS

11/29/12	.25		X	Update SBS
11/30/12	1		X	Prepare & Mail letter to Douglas Smith
12/04/12	.50		X	Prepare & Mail letter to Douglas Smith
12/10/12	1	X		Mallone
12/10/12	.25		X	Email to David Norris
12/12/12	.25		X	Email to Gary Moylan, Esq.
12/12/12	.25		X	Email to Sarah Fern Meil, Esq.
12/14/12	.25		X	Email to Gary Moylan, Esq.
12/17/12	.25		X	Email to Carol Seekcamp
12/18/12	1.5		X	Prepared Investigative Report
12/18/12	.25		X	Updated SBS
01/07/13	1.5		X	Prepared and mailed letter to Gary Moylan, Esq. and Justin Reynolds.
01/07/13	.50	X		Warren County Prosecutor
01/07/13	.25		X	Updated SBS
01/16/13	.25	X		Reynolds
01/16/13	.25		X	Updated SBS
01/28/13	.25		X	Email to Gary Moylan, Esq. and reviewed reply
01/28/13	.25		X	Email to Gary Moylan, Esq. and reviewed reply
01/28/13	.25	X		Reynolds
01/28/13	.50		X	Prepared and mailed letter to Gary Moylan, Esq. and Justin Reynolds
01/28/13	.25		X	Updated SBS
02/06/13	5		X	Prepare Factual and Evidence Summary and exhibits
02/06/13	.25		X	Email to Sarah Fern Meil, Esq. and review reply
02/06/13	.25		X	Updated SBS
02/11/13	.25		X	Email to Gary Moylan, Esq.
02/12/13	.50		X	Prepared and mailed letter to Douglas Smith
02/12/13	.25		X	Email to Sarah Fern Meil, Esq.
02/26/13	.25		X	Email to Sarah Fern Meil, Esq. and review reply
02/27/13	.25		X	Email to Sarah Fern Meil, Esq. and review reply
02/27/13	.25	X		Sarah Fern Meil, Esq.
02/27/13	.25		X	Updated SBS
03/04/13	.25		X	Updated SBS
03/05/13	.25		X	Email to Sarah Fern Meil, Esq. and review reply
03/05/13	2		X	Prepared Consent Order
03/05/13	.50		X	Prepared and mailed letter to Douglas Smith
03/11/13	.25		X	Updated SBS
03/15/13	.25		X	Updated SBS
03/20/13	.25	X		Douglas Smith
03/20/13	.25		X	Updated SBS
03/20/13	.25		X	Email to Sarah Fern Meil, Esq. and review reply
04/08/13	.25		X	Prepare memo to the file
04/08/13	1		X	Prepare close-out sheet and prepare file for referral to DAG
04/08/13	.25		X	Updated SBS
04/10/13	.25		X	Updated SBS

07/28/14	.25		X	Review email and memo from DAG Snow
07/31/14	.25		X	Updated SBS
08/15/14	.50	X		DAG Cretella
08/15/14	.50		X	Review file and email documents to DAG Cretella
08/15/14	.25		X	Review email from DAG Cretella and send reply
08/18/14	.50		X	Review American General policies
08/18/14	.25		X	Review email from DAG Cretella and send reply
08/20/14	.25		X	SBS search Justin Reynolds
08/20/14	.25		X	Email to DAG Cretella and review reply
08/22/14	.50	X		DAG Cretella
08/29/14	.25		X	Review email from DAG Cretella
09/08/14	.25		X	Review email from DAG Cretella
09/10/14	1		X	Received file back from DAG and review file
09/10/14	1	X		Larry Hershman, MetLife
09/10/14	.25		X	Letter to Tony Decarlo, MetLife
09/10/14	.25		X	Letter to Larry Hershman, MetLife
09/10/14	.25		X	Updated SBS
09/15/14	.25		X	Email to DAG Cretella and review reply
09/22/14	.25		X	Email to Tony Decarlo, MetLife and review reply
09/22/14	.25		X	Email to DAG Cretella and review reply
09/29/14	.25		X	Email to Tony Decarlo, MetLife and review reply
09/29/14	3			Prepare certification of costs
09/27/12	.45¢		X	First class letter to Reynolds
09/27/12	\$5.75		X	First class certified RRR letter to Reynolds
10/15/12	.45¢		X	First class letter to Nancy Applegate
10/17/12	.45¢		X	First class letter to Reynolds
10/17/12	\$5.75		X	First class certified RRR letter to Reynolds
11/30/12	.45¢		X	First class letter to Smith
11/30/12	\$5.75		X	First class certified RRR letter to Smith
12/04/12	.45¢		X	First class letter to Smith
01/07/13	.45¢		X	First class letter to Reynolds
01/07/13	\$5.75		X	First class certified RRR letter to Reynolds
01/07/13	.45¢		X	First class letter to Moylan
01/07/13	\$5.75		X	First class certified RRR letter to Moylan
01/28/13	.45¢		X	First class letter to Reynolds
01/28/13	\$5.75		X	First class certified RRR letter to Reynolds
01/28/13	.45¢		X	First class letter to Moylan
02/12/13	.45¢		X	First class letter to Smith
02/12/13	\$5.75		X	First class certified RRR letter to Smith
03/05/13	.45¢		X	First class letter to Smith
TOTAL COSTS				\$45.20
TOTAL TIME	59.75	@ \$50.00 per hour		=TOTAL COSTS OF INVESTIGATION - \$ 2987.50