

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

RECEIVED

DEC 07 2018

SUPERIOR COURT OF NJ
MERCER VICINAGE
CIVIL DIVISION

By: William B. Puskas, Jr.
Deputy Attorney General
NJ Attorney ID: 014901976
(609) 376-2965
William.Puskas@law.njoag.gov

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION-MERCER COUNTY
DOCKET NO. MER-C-

MARLENE CARIDE,)
COMMISSIONER OF THE)
DEPARTMENT OF BANKING AND)
INSURANCE OF NEW JERSEY,)

Plaintiff,)

v.)

BROADWAY INSURANCE &)
SURETY COMPANY INC.,)

Defendant.)

Civil Action

PETITION FOR REHABILITATION

TO: Honorable Paul Innes, P.J. Ch.
Superior Court of New Jersey, Chancery Division
Mercer County Civil Courts Building
175 South Broad Street
Trenton, NJ 08650

Broadway Insurance & Surety Company Inc.
155 Passaic Avenue, Suite 150
Fairfield, NJ 07004
ATTN: Veton Binakaj, President

Veton Binakaj, Director, Broadway Insurance & Surety
Company Inc.
147 Northfield Avenue
West Orange, NJ 07052

Raif Hyseni, Director, Broadway Insurance & Surety Company
Inc.
1 Normal Avenue
Montclair, NJ 07043

Shpresa Binakaj, Director, Broadway Insurance & Surety
Company Inc.
30 16th Avenue
Elmwood Park, NJ 07407

Stanley Osur, Director, Broadway Insurance & Surety Company
Inc.
34 Piedmont Road
Tenafly, NJ 07670

Ali Lofti-Nejad, Director, Broadway Insurance & Surety
Company Inc.
24B US Route 46 West
Lodi, NJ 07644

Stanley Robert Cygan, Director, Broadway Insurance & Surety
Company Inc.
209 Greene Avenue
Middlesex, NJ 08846

Richard Blender, Director, Broadway Insurance & Surety
Company Inc.
43 Highland Drive
West Caldwell, NJ 07006

PLEASE TAKE NOTICE that as soon as counsel may be
heard, Gurbir S. Grewal, Attorney General of New Jersey, by William

B. Puskas, Jr., Deputy Attorney General, attorney for Marlene Caride, Commissioner of Banking and Insurance, will move before the court at a date and time to be set by the Honorable Paul Innes, P.J. Ch., for: (1) an Order To Show Cause with Temporary Restraints; and (2) an Order approving the rehabilitation of Broadway Insurance & Surety Company Inc.

PLEASE TAKE FURTHER NOTICE that in support of this application, the Commissioner will rely on the Letter Brief and the Certification of Steven P. Kerner, Jr., Assistant Commissioner of Solvency Regulation, submitted in support of this Petition.

A form of Order to Show Cause and a form of Order of Rehabilitation are also submitted with this Petition.

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: 

William B. Puskas, Jr.
Deputy Attorney General

Dated: December 7, 2018