May 14 2015 13:59 P. 02

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, New Jersey 08625

By: Adam B. Masef
Deputy Attorney General
NJ Attorney ID: 013692012
(609) 292-8150
Adam.Masef@dol.lps.state.nj.us

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - UNION COUNTY DOCKET NO. UNN-L-3370-13

KENNETH E. KOBYLOWSKI,

COMMISSIONER, NEW JERSEY

DEPARTMENT OF BANKING AND

INSURANCE,

Plaintiff,

Plaintiff,

BFD# 12-51377-35

V.

BRIAN PEREZ and ADELSON

BERLUS,

Defendants.

whereas, the Commissioner and Defendant Perez have reached an amicable agreement resolving the allegations in controversy as raised in the Commissioner's September 26, 2013 Complaint ("Complaint") against Defendant Perez and have consented to the entry of the within Stipulation of Settlement; and

WHEREAS, the Commissioner alleges in his Complaint that Defendant Perez failed to disclose other drivers of the insured vehicle to GEICO on an application for automobile insurance in violation of N.J.S.A. 17:33A-4a(4)(b); and

WHEREAS, Defendant Perez neither admits nor denies the allegations as stated in the Complaint, but consents to the payment of Two Thousand, Four Hundred, Seventy-Five Dollars and Zero Cents (\$2,475.00) ("Settlement Payment") to the Commissioner; and

IT IS FURTHER HEREBY STIPULATED AND AGREED, upon execution of this Stipulation of Settlement by Defendant Perez, Defendant Perez shall remit to the attorney for the Commissioner the Settlement Payment by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to

Adam B. Masef, 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 any future violation of the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30, by Defendant Perez shall be considered a second or subsequent violation; and

May 14 2015 13:59 P. 04

IT IS FURTHER HEREBY STIPULATED AND AGREED, that this Stipulation of Settlement can be used in any subsequent civil or criminal proceeding; and

IT IS FURTHER HEREBY STIPULATED AND AGREED, that the Settlement Payment of this Stipulation of Settlement is 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 is not intended to constitute a debt which may be limited or discharged in a bankruptcy proceeding.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

Brian Perez

Defendant

Dan T. Matrafajlo, Esq.

Attorney for befendant

JOHN J. HOFFMAN

ACTING ATTORNEY GENERAL OF NEW JERSEY

Attorney for Plaintiff

By:

Adam B. Masef

Deputy Attorney General

Jacea.