

MATTHEW J. PLATKIN
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: Sean Healy
Deputy Attorney General
(609) 376-2765
NJ Attorney ID: 170482017
Sean.Healy@law.njoag.gov

SUPERIOR COURT OF NEW JERSEY
SPECIAL CIVIL PART BURLINGTON COUNTY
DOCKET NO. BUR-DC-008635-25

JUSTIN ZIMMERMAN,)	
COMMISSIONER OF THE)	<u>Civil Action</u>
NEW JERSEY DEPARTMENT OF)	
BANKING AND INSURANCE,)	STIPULATION OF SETTLEMENT
)	
Plaintiff,)	
)	
v.)	
)	
ERNANES RODRIGUES DE ARAUJO,)	
)	
Defendant.)	

WHEREAS Plaintiff Justin Zimmerman, Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff" or "Commissioner"), and Defendant Ernanes Rodrigues De Araujo ("De Araujo") ("Defendant") (collectively, the "Parties") have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement ("Settlement").

WHEREAS the Parties have determined and hereby agree that settlement is in each of their best interests, and for good cause shown.

NOW THEREFORE, the Parties agree fully and finally to settle this matter pursuant to the terms and conditions below.

1. Defendant admits that he submitted materially false information in support of an application for automobile insurance to New Jersey Progressive Insurance Company on or about December 11, 2021, by knowingly failing to disclose and concealing a resident household unlicensed driver of an insured vehicle on the application, in violation of 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)(4)(b) and -4(a)(5).

2. Any future violations of the Fraud Act shall be considered subsequent violations pursuant to 17:33A-5(c).

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

4. Defendant shall pay a total amount of \$2,075 to the Commissioner ("Settlement Amount"). This Settlement Amount consists of \$1,500.00 in civil penalties pursuant to N.J.S.A. 17:33A-5(b); \$500.00 in attorneys' fees pursuant to N.J.S.A. 17:33A-5(b); and a \$75.00 statutory surcharge pursuant to N.J.S.A. 17:33A-5.1.

5. Defendant shall satisfy the judgment upon the following terms and conditions:

a. Immediately upon execution of this Stipulation of Settlement by Defendant, but no later than September 1, 2025, Defendant shall remit to the attorney for the Commissioner a payment in the amount of \$2,075.00 by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

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

6. No representation, inducement, promise, understanding, condition, or warranty not set forth in this Settlement has been made to or relied upon by Defendant in agreeing to this Settlement. Defendant represents that this Settlement is freely and voluntarily entered into without any degree of duress or compulsion.

7. The Parties agree that each Party shall bear its own legal and other costs incurred in connection with this matter, and no additional attorneys' fees or costs shall be due, except Defendant agrees to pay Plaintiff's attorneys' fees pursuant to N.J.S.A. 17:33A-5(b) in the amount stated in Paragraph 4.

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

If to the Commissioner: Sean Healy
Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, NJ 08625

If to Defendant: Ernanes Rodrigues De Araujo
431 Elm Avenue,
Apartment 33,
Riverton, New Jersey 08077

9. This Settlement may be executed in counterparts, each of which constitutes an original and all of which constitutes one and the same agreement.

10. The penalties of this Settlement 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.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 9/1/2025

By: *Sean Healy*
Sean Healy
Deputy Attorney General

Dated: 09-01-2025

By: *[Signature]*
Ernanes Rodrigues De Araujo
Defendant