

JENNIFER DAVENPORT
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

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - UNION COUNTY
DOCKET NO. UNN-DC-014125-25

SUSAN OCHS, ACTING)	
COMMISSIONER OF THE)	<u>Civil Action</u>
NEW JERSEY DEPARTMENT OF)	
BANKING AND INSURANCE, ¹)	STIPULATION OF SETTLEMENT
)	
Plaintiff,)	
)	
v.)	
)	
GENESIS M. DEJESUS,)	
)	
Defendant.)	

WHEREAS Plaintiff Susan Ochs, Acting Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff" or "Commissioner"), and Defendant Genesis M. DeJesus ("Defendant") (collectively, "Parties") have reached an amicable agreement

¹ Pursuant to R. 4:34-4, the caption has been revised to reflect the current Acting Commissioner of the Department.

resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement ("Stipulation").

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 she violated the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30 ("Fraud Act"), specifically by (i) falsely representing to Progressive Garden State Insurance Company ("Progressive") during a telephone call with Progressive on a January 17, 2020 at 6:37 p.m. ("January 17 Call") to reinstate her lapsed automobile insurance policy ("Policy") that her 2010 BMW 328 ("BMW") had not been involved in an accident or theft between the date the Policy lapsed, January 11, 2020, and the date and time of the January 17 Call when, in fact, the BMW was involved in both a theft and an accident on January 17, 2020 prior to the January 17 Call, in violation of N.J.S.A. 17:33A-4(a)(4)(b) and -4(a)(5).

2. Defendant's aforementioned conduct constitutes one (1) violations of the Fraud Act, and any future violations of the Fraud Act shall be considered subsequent violations pursuant to 17:33A-5(c).

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

4. Defendant shall pay a total of \$3,125.00 to the Commissioner ("Settlement Amount"). This Settlement Amount consists of \$2,500.00 in civil penalties for one (1) violation of the Fraud Act 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 \$125.00 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, Defendant shall remit to the below-listed attorney for the Commissioner a payment in the amount of \$3,125.00 constituting the entire Settlement Amount by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

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

b. Defendant shall write "DOL 22-00864" on the memo line or elsewhere on the face of the Settlement Amount payment.

6. Defendant represents that this Stipulation is freely and voluntarily entered into without 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 of this Stipulation.

8. For purposes of construction, this Stipulation shall be deemed drafted by all Parties to this Stipulation and therefore shall not be construed against any Party for that reason in any subsequent dispute.

9. The undersigned counsel, Defendant, and any other signatories represent and warrant that they are fully authorized to execute this Stipulation on behalf of the persons indicated below.

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

If to the Commissioner: Brian R. Fitzgerald
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: Richard A. Amdur, Jr., Esq.
 State Highway 34
 P.O. Box 409
 Matawan, NJ 07747

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

12. Pursuant to N.J.S.A. 17:33A-10(c), a copy of this Stipulation shall be provided to any appropriate licensing authority.

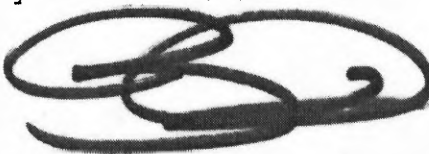
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13. The penalties of this Stipulation are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and protection of the public health, safety, and welfare, and are not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding.

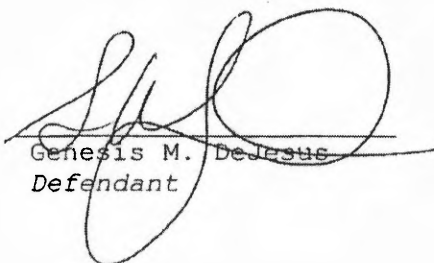
CONSENTED AS TO FORM, CONTENT, AND ENTRY:

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

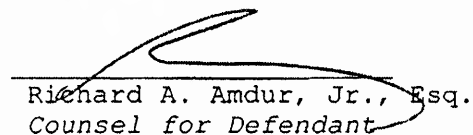
Dated: 4/7/2026

By: 
Brian R. Fitzgerald
Deputy Attorney General
Counsel for Plaintiff

Dated: 3/04/2026

By: 
Genesis M. DeJesus
Defendant

Dated: 3/4/2026

By: 
Richard A. Amdur, Jr., Esq.
Counsel for Defendant