

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

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - HUDSON COUNTY
DOCKET NO. HUD-L-000179-25

JUSTIN ZIMMERMAN,)
COMMISSIONER OF THE)
NEW JERSEY DEPARTMENT OF)
BANKING AND INSURANCE,)
)
Plaintiff,)
)
v.)
)
HARRY STEVEN GONZALEZ-)
PADILLA AND MARCELINO)
GONZALEZ-GARCIA,)

Civil Action

STIPULATION OF SETTLEMENT

Defendant.

WHEREAS Plaintiff Justin Zimmerman, Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff" or "Commissioner"), and Defendant Harry Steven Gonzalez-Padilla ("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 ("Stipulation").

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

WHEREAS, Defendant Marcelino Gonzalez-Garcia is deceased, and no substitution of parties is sought with respect to him;

WHEREAS, Plaintiff agrees that, as part of this Stipulation, all claims against Marcelino Gonzalez-Garcia and his estate shall be discontinued with prejudice, and Plaintiff releases the estate of Marcelino Gonzalez-Garcia from any and all claims arising out of or relating to this action;

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

1. For purposes of resolving this civil enforcement action and entering into this Stipulation, the Defendant admits that certain conduct forming the basis of this action constituted a 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)(1), N.J.S.A. 17:33A-4(3)(a) and (b), and 17:33A-4(b). This admission shall not be used as evidence regarding the specifics of this case, except as necessary to enforce the terms of this Stipulation. Defendant does not admit any facts, allegations, or

legal conclusions beyond the limited admission expressly set forth herein.

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

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

4. The Defendant shall pay a total amount of \$6,800.00 to the Commissioner ("Settlement Amount"). The Settlement Amount consists of \$5,000.00 in civil penalties pursuant to N.J.S.A. 17:33A-5(b); \$1,550.00 in attorneys' fees pursuant to N.J.S.A. 17:33A-5(b); and a \$250.00 statutory surcharge pursuant to N.J.S.A. 17:33A-5.1.

5. The Defendant shall satisfy the Settlement Amount upon the following terms and conditions:

a. Within 30 days of execution of this Stipulation, the Defendant shall remit to the attorney for the Commissioner a down payment in the amount of \$500.00 **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

b. After the initial payment of \$500.00, twenty-four (24) installment payments of \$75.00 are due on the 1st of each month beginning on May 1, 2026, and ending on April 1, 2028 ("Installment Payments") made payable to the "Commissioner, New Jersey Department of Banking and Insurance", with the notation BFD No. 21-51377 and sent to:

Collection Department
New Jersey Department of Banking and Insurance
20 West State Street, 10th Floor
P.O. Box 325
Trenton, New Jersey 08625

c. Additionally, the Defendant agrees to execute a separate Consent Judgment for the entire Settlement Amount to be docketed in the State Of New Jersey. Plaintiff agrees not to docket the Consent Judgment unless there is a default in the Installment Payments, or until after April 1, 2028. Plaintiff agrees that the judgment shall be enforced solely within the State of New Jersey and shall not be domesticated, executed upon, or enforced in any other jurisdiction.

6. No representation, inducement, promise, understanding, condition, or warranty not set forth in this Stipulation has been made to or relied upon by the Defendant in agreeing to this Stipulation. The Defendant represents that this Stipulation is freely and voluntary 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 the 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 Stipulation 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 the Defendant: Harry Steven Gonzalez-Padilla
c/o Haoxu Li, Esq.
122 East 42nd Street, Suite 421
New York, New York 10168

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

10. The penalties in 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.

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

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

JENNIFER DAVENPORT
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 3/20/2026

By: *Sean Healy*
Sean Healy
Deputy Attorney General

Haoxu Li

Dated: 03/19/2026

By: _____
Haoxu Li, Esq. Sign ID: d8ab8f1f
Attorney for the Defendant
Harry Steven Gonzalez-Padilla