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SUPERIOR COURT OF NEW JERSEY  
 SPECIAL CIVIL PART - UNION COUNTY  
 DOCKET NO. UNN-DC-009315-14

KENNETH E. KOBYLOWSKI  
 COMMISSIONER OF THE NEW  
 JERSEY DEPARTMENT OF  
 BANKING AND INSURANCE,

Plaintiff,

v.

VALENCIA BROWN,

Defendant.

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Civil Action  
**STIPULATION OF SETTLEMENT**

WHEREAS Kenneth E. Kobylowski, Commissioner of the New Jersey Department of Banking and Insurance, and Defendant, Valencia Brown, have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement; and

IT IS HEREBY STIPULATED AND AGREED that, Defendant Valencia Brown admits that she knowingly provided false and misleading statements concerning a material fact in an application for automobile insurance submitted to an insurance company by providing a false address for her residence and a

false garage location for the insured vehicle on her application for GEICO insurance for the policy periods ranging from February 18, 2011 through February 9, 2012; and

IT IS FURTHER HEREBY STIPULATED AND AGREED that this conduct constitutes two violations of N.J.S.A. 17:33A-4, and that any future violation of the New Jersey Insurance Fraud Prevention Act shall be considered a subsequent violation; and

IT IS FURTHER HEREBY STIPULATED AND AGREED that Defendant Valencia Brown shall pay a total sum of **\$2,710.00** to the Commissioner of the New Jersey Department of Banking and Insurance. The amount consists of civil penalties in the amount of \$1,500.00, attorneys' fees and costs in the amount of \$1,135.00 and a surcharge of \$75.00 in accordance with N.J.S.A. 17:33A-5.1, to be satisfied upon the following terms and conditions:

1. On or before January 30, 2015, Defendant Valencia Brown shall remit to the attorney for the Commissioner a payment in the amount of Five Hundred Dollars and 00/100 cents (\$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:

Kristina Cretella, Deputy Attorney General  
Banking, Insurance and Insurance Fraud Section  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, N.J. 08625-0117

2. Beginning March 1, 2015, and continuing thereafter on the first day of each consecutive month for twenty-six (26) months until the final payment, Defendant shall pay the amount of Eighty-Five Dollars and 00/100 cents (\$85.00), by certified check, official bank check or money order made payable to the **"Commissioner, New Jersey Department of Banking and Insurance"** and sent to:

Commissioner, N.J. Department of Banking and Insurance  
Attn: Rose McGill, Fraud Collection  
20 West State Street  
P.O. Box 324  
Trenton, N.J. 08625

3. In conjunction with the execution of this Stipulation of Settlement, the parties shall also enter into a Consent Judgment for the entire amount owed.
4. If the Defendant fails to make any scheduled payment within ten (10) days of its due date, Plaintiff may, upon notice to Defendant, declare the entire balance outstanding to be immediately due and payable. Thereafter, plaintiff may take any action available under the laws of this State to collect the amount outstanding at that time, including post-judgment interest from the date of the judgment, attorneys' fees and other remedies available under the law.


IT IS FURTHER HEREBY STIPULATED AND AGREED that pursuant to N.J.S.A. 17:33A-10c, a copy of this Stipulation of Settlement shall be provided to any appropriate licensing authority; and

IT IS FURTHER HEREBY STIPULATED AND AGREED that the penalties of this Stipulation of 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:**

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff

Dated: 2/4/2015

By:   
Kristina Cretella  
Deputy Attorney General

 Dated: 1/28/15  
Valencia Brown  
Defendant