



Stipulation of Settlement ("Stipulation"), 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, N.J.S.A. 17:33A-4(a)(1), by knowingly making material false statements to Progressive Insurance Company ("Progressive") in support of a claim for benefits or other payment from an insurance company.

2. Defendant's aforementioned conduct constitutes one violation of the Fraud Act, and any future violations of the Fraud Act shall be considered second and subsequent violations.

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

4. Defendant shall pay a total judgment of \$3,125.00 to the Commissioner ("Settlement Amount"). The Settlement Amount consists of \$2,500.00 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 \$125.00 statutory surcharge of five percent (5%) of the settlement amount, pursuant to N.J.S.A. 17:33A-5.1.

5. Immediately upon execution of this Stipulation by Defendant, Defendant shall remit to the attorney for the Commissioner a payment in the amount of \$3,125.00 by certified

check, official bank check, money order, or attorney trust account check made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

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

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

If to the Commissioner:

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

If to Defendant:

Noah Burton, Esq.  
Schwartz Burton LLP  
500 River Avenue, Suite 215  
Lakewood, New Jersey 08701

7. The filing of the fully executed Stipulation shall serve as a Stipulation of Dismissal with Prejudice of the Complaint.

8. The penalties of this Stipulation are imposed pursuant to the police powers of the State of New Jersey for the

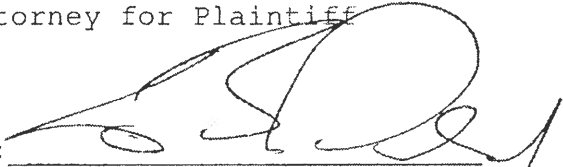
enforcement of the law and protection of the public health, safety, and welfare, and are not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding.

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

10. To facilitate execution, this Agreement may be executed in counterparts as may be required. All counterparts hereof shall collectively constitute a single agreement.

**CONSENTED AS TO FORM, CONTENT, AND ENTRY:**

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff

By:   
William B. Puskas, Jr.  
Deputy Attorney General

Dated: 11-15-2021

Anna Sofer  
ANNA SOFER, also known as  
ANNA Menshikova, Defendant

Dated: 10/05/21

BURTON LAW GROUP LLP  
Attorney for Defendant

By: Noah Burton  
Noah Burton, Esq.

Dated: 10/7/2021