

**IN THE CIRCUIT COURT OF THE  
SECOND JUDICIAL CIRCUIT  
IN AND FOR LEON COUNTY, FLORIDA**

**STATE OF FLORIDA *ex rel.* JASON M. Schupp,**

**Plaintiff/Relator,**

**Case No. 2022-CA-000461**

**vs.**

**QUI TAM COMPLAINT**

**UNDER SEAL**

**ARMOUR RESIDENTIAL REIT, et al.,**

**Defendants.**

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**NOTICE OF VOLUNTARY DISMISSAL**  
**OF**  
**DEFENDANT, EMBRAER AIRCRAFT HOLDING, INC.**

Pursuant to Florida Rules of Civil Procedure Rule 1.420, the State of Florida, Department of Financial Services, hereby files this **Notice of Voluntary Dismissal of Defendant Embraer Aircraft Holding, Inc., with prejudice as to the Plaintiff/Relator and without prejudice as to the State of Florida** and, and states:

1. This Florida False Claims Act action was filed under seal by the Plaintiff/Relator. Per the Plaintiff/Relator's Third Amended Complaint, this action involves 89 named defendants, including Embraer Aircraft Holding, Inc.

2. Initially, representatives of the Florida Department of Legal Affairs and the Florida Department of Financial Services jointly investigated the Plaintiff/Relator's allegations. Because the allegations in this lawsuit involve funds for which the Department of Financial Services is statutorily responsible, the Department of Legal Affairs and the Department of Financial Services have agreed that the Department of Financial Services will take over the handling of this action.

3. Pursuant to section 68.083(4), Florida Statutes, "If the Department of Financial Services takes over the action ... the word "department" as used in this act means the Department of Financial Services, and that department, for purposes of that action, shall have all rights and standing granted the department under this act."

4. Section 68.084(2)(a), Florida Statutes states the “department may at any point voluntarily dismiss the action notwithstanding the objections of the person initiating the action.”

5. Based on its investigation, the State of Florida, Department of Financial Service, hereby **dismisses Defendant Embraer Aircraft Holding, Inc., with prejudice as to the Plaintiff/Relator and without prejudice as to the State of Florida.**

6. In as much as this action remains pending against many of the 89 defendants named in this case, the entire court file in the above styled case shall **remain under seal** pursuant to the Court’s Order Extending Seal dated May 23, 2024.

Respectfully submitted this 21<sup>st</sup> day of November, 2024.

**JIMMY PATRONIS**  
**Chief Financial Officer**

s/ David W. Moyé  
David W. Moyé, Esq. (Fla. Bar No. 0782350)  
Senior Attorney  
Office of the General Counsel  
Florida Department of Financial Services  
200 East Gaines Street  
Tallahassee, Florida 32399-0333  
Tele. No. (850) 413-4162  
david.moye@myfloridacfo.com

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on November 21, 2024, a true and correct copy of this “Notice of Voluntary Dismissal of Defendant Embraer Aircraft Holding, Inc., was filed with the Clerk of Court using the Florida Court’s e-Filing Portal, which will send a notice of electronic filing to Jason Schupp, Plaintiff/Relator and Christopher Knight, Florida Assistant Attorney General.

s/ David W. Moyé  
David W. Moyé, Esq. (Fla. Bar No. 0782350)  
Senior Attorney  
Office of the General Counsel  
Florida Department of Financial Services  
david.moye@nyfloridacfo.com