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ALLSTATE NEW JERSEY INSURANCE
COMPANY, et al.,

Plaintiffs,

v.

GREGORIO LAJARA, et al.,

Defendants.

COMMISSIONER OF THE NEW JERSEY
DEPARTMENT OF BANKING AND
INSURANCE,

Plaintiff-Intervenor,

v.

GREGORIO LAJARA, et al.,

Defendants.

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION - UNION COUNTY
: DOCKET NO. UNN-L-4091-08

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CIVIL ACTION

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The claims in this action having been settled and resolved limited to the following parties: Plaintiff-Intervenor, Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), Defendant Bryan Siegel, D.C., Defendant Bound Brook Chiropractic, P.C. ("Bound Brook"), and Defendant Aleve Chiropractic, P.C. ("Aleve"):

WHEREAS, Defendant Siegel is licensed by the State of New Jersey as a Doctor of Chiropractic and is a "person" and "practitioner" as defined by N.J.S.A. 17:33A-3; and

WHEREAS, Defendant Siegel is the President of Defendant Bound Brook, which is a New Jersey Professional Corporation and is a "person" as defined by N.J.S.A. 17:33A-3; and

WHEREAS, Defendant Siegel is the sole director of Defendant Aleve, which is a New Jersey Professional Corporation and a "person" as defined by N.J.S.A. 17:33A-3; and

WHEREAS, the Commissioner and Defendants Siegel, Bound Brook, and Aleve have reached an amicable agreement resolving the allegations in controversy as raised in the Commissioner's January 6, 2012 Intervenor-Complaint ("Intervenor-Complaint") against Defendants Siegel, Bound Brook, and Aleve, and have consented to the entry of the within Stipulation of Settlement; and

WHEREAS, pursuant to N.J.S.A. 17:33A-5d, Defendants Siegel, Bound Brook, and Aleve neither admit nor deny the allegations as stated in the Intervenor-Complaint, but consent to the payment of a total of \$200,000.00 ("Settlement Payment") as allocated below; and

IT IS STIPULATED AND AGREED, that Defendants Siegel, Bound Brook, and Aleve shall pay a sum of Two Hundred Thousand Dollars and 00/100 cents (\$200,000.00) to the Commissioner of the New Jersey Department of Banking and Insurance, which consists of civil penalties in the amount of \$165,000.00 as to Defendants Siegel, Bound Brook, and Aleve, jointly and severally, pursuant to N.J.S.A. 17:33A-5b; \$10,250.00 in attorneys' fees, pursuant to N.J.S.A. 17:33A-5b, as to Defendants Siegel, Bound Brook, and Aleve, jointly and severally; and a \$8,250.00 statutory surcharge to Defendant Siegel, individually, a \$8,250.00 statutory surcharge to Defendant Bound Brook, individually, and a \$8,250.00 statutory surcharge to Defendant Aleve, individually, pursuant to N.J.S.A. 17:33A-5.1; and

IT IS FURTHER STIPULATED AND AGREED, that, upon Defendants' execution of this Stipulation of Settlement, Defendants shall remit to the attorney for the Commissioner of the New Jersey Department of Banking and Insurance a payment in the amount of Twenty Thousand Dollars and 00/100 cents

(\$20,000.00), by certified check, official bank check, or money order, made payable to "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

Adam B. Masef, Deputy Attorney General
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 117
Trenton, NJ 08625-0117

IT IS FURTHER STIPULATED AND AGREED, that Defendants shall then remit the remaining balance of said Settlement Payment, One Hundred Eighty Thousand Dollars and 00/100 cents (\$180,000.00), in monthly installment payments of Three Thousand, Seven Hundred and Fifty Dollars and 00/100 cents (\$3,750.00), to be paid on or by the first day of every month, beginning March 1, 2015, by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

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

IT IS FURTHER STIPULATED AND AGREED, that, in conjunction with the execution of this Stipulation of Settlement, the parties shall also enter into a Consent Judgment for the entire Settlement Payment; and

IT IS FURTHER STIPULATED AND AGREED, that, if Defendants fail to make any scheduled payment within ten (10) days of its due date, the Commissioner can, upon notice to Defendants, declare the entire balance outstanding to be immediately due and payable. Thereafter, the Commissioner 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 any other remedies available under the law; and

IT IS FURTHER STIPULATED AND AGREED, that, in the event the full amount of the Settlement Payment is not paid, the Commissioner may exercise any and all remedies available by law, including, but not limited to, recovery of any unpaid penalties pursuant to the Penalty Enforcement Law, N.J.S.A. 2A:58-10 et seq.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

Dated: 3/12/15

By: [Signature]
JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff-Intervenor
Adam B. Masef
Deputy Attorney General

By: [Signature] Dated: 3/10/15
Bonnie M. Weir, Esq.
Attorney for Defendants Bryan Siegel, D.C., Bound Brook
Chiropractic, P.C., and Aleve Chiropractic, P.C.

By: [Signature] Dated: 3/10/15
Bryan Siegel, D.C., in his individual capacity, as President
of Bound Brook Chiropractic, P.C., and as Director of Aleve
Chiropractic, P.C.