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ALLSTATE NEW JERSEY INSURANCE COMPANY, et al.,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION - UNION COUNTY
Plaintiffs,	:	DOCKET NO. UNN-L-4091-08
	:	
v.	:	
	:	
GREGORIO LAJARA, et al.,	:	<u>CIVIL ACTION</u>
	:	
Defendants.	:	STIPULATION OF SETTLEMENT FOR
	:	DEFENDANTS ALFRED TAWADROUS,
	:	M.D. AND BEST HEALTH MEDICAL
	:	CENTER, P.C.
<hr/>		
COMMISSIONER, NEW JERSEY DEPARTMENT OF BANKING & INSURANCE,	:	
	:	
Plaintiff-Intervenor,	:	
	:	
v.	:	
	:	
GREGORIO LAJARA, et al.,	:	
	:	
Defendants.	:	

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 & Insurance

("Commissioner"), Defendant Alfred Tawadrous, M.D. ("Tawadrous") and Best Health Medical Center, P.C. ("Best Health"):

WHEREAS, Defendant Tawadrous is licensed by the State of New Jersey as a neurologist, and is a "person" and "practitioner" as defined by the New Jersey Insurance Fraud Prevention Act N.J.S.A. 17:33A-1 to -30 ("Fraud Act"); and

WHEREAS, Defendant Tawadrous is the Registered Agent of Defendant Best Health, which is a New Jersey Professional Corporation and is a "person" as defined by N.J.S.A. 17:33A-3; and

WHEREAS, the Commissioner and Defendants Tawadrous, and Best Health 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 Tawadrous and Best Health, and have consented to the entry of the within Stipulation of Settlement; and

WHEREAS, Defendants Tawadrous and Best Health admit to their conduct as stated in Defendant Tawadrous' October 26, 2010 Certification (Attached hereto as Exhibit A); and

WHEREAS, pursuant to N.J.S.A. 17:33A-5d, Defendants Tawadrous and Best Health neither admit nor deny the allegations as stated in the Intervenor-Complaint, but consent to payment of a total of \$39,000.00 ("Settlement Payment") as allocated below; and

IT IS STIPULATED AND AGREED, that Defendants Tawadrous and Best Health shall pay a sum of \$39,000.00 to the Commissioner of the New Jersey Department of Banking and Insurance, which consists of civil penalties in the amount of \$30,000.00, pursuant to N.J.S.A. 17:33A-5b; \$6,000.00 in attorneys' fees, pursuant to N.J.S.A. 17:33A-5b; a \$1,500.00 statutory surcharge as to Defendant Tawadrous, pursuant to N.J.S.A. 17:33A-5.1, and a \$1,500 statutory surcharge as to Defendant Best Health, 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 Tawadrous and Best Health shall remit to the attorney for the Commissioner of the New Jersey Department of Banking and Insurance full payment in the amount of \$5,000.00, by certified check, official bank check, or money order, made payable to "Commissioner, New Jersey Department of Banking & Insurance" and sent to:

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

IT IS FURTHER STIPULATED AND AGREED, that Defendants Tawadrous and Best Health shall then remit the remaining balance of said Settlement Payment, \$34,000.00, in monthly installment

payments of \$944.45, to be paid on the first day of every month, beginning February 1, 2016, 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 Wept State Street, loth Floor
P.Q. Box 325
Trenton, New Jersey 08625

IT IS FURTHER STIPULATED AND AGREED, that in conjunction with the execution of this Stipulation of Settlement, Defendants Tawadrous and Best Health shall also enter into a Consent Judgment for the entire amount of \$39,000.00; and

IT IS FURTHER 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 this Stipulation of Settlement can be used in any subsequent civil or criminal proceeding; and

IT IS FURTHER HEREBY STIPULATED AND AGREED, that if Defendants fail to make any payment, Plaintiff may, upon notice to Defendants, 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

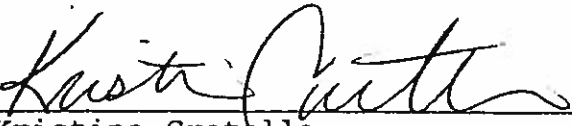
interest from the date of the judgment, attorneys' fees and other remedies available under the law.


IT IS FURTHER 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 OF ORDER:

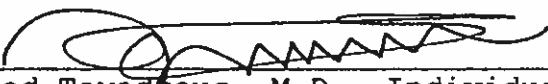
JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff-Intervenor
Commissioner of the New Jersey
Department of Banking & Insurance

Dated: 3/8/2016

By: 
Kristina Cretella
Deputy Attorney General

By: 
Terri Terri Lodge, Esq.
Attorney for Defendants Alfred
Tawadrous, M.D. and Best Health
Medical Center, P.C.

1/19/16

By: 
Alfred Tawadrous, M.D., Individually
and as Registered Agent of Best Health
Medical Center, P.C.

Dated: 1/19/16