

and Defendant Absolute Chiropractic, P.C. ("Absolute Chiropractic"):

WHEREAS, Defendant Lewandowski is licensed by the State of New Jersey as a Doctor of Chiropractic, 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 Lewandowski is the President and Registered Agent of Defendant Absolute Chiropractic, 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 Lewandowski, and Absolute Chiropractic 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 Lewandowski and Absolute Chiropractic, and have consented to the entry of the within Stipulation of Settlement; and

WHEREAS, Defendants Lewandowski and Absolute Chiropractic admit to their conduct as stated in Defendant Lewandowski's May 25, 2010 Certification (Attached hereto as Exhibit A); and

WHEREAS, pursuant to N.J.S.A. 17:33A-5d, Defendants Lewandowski and Absolute Chiropractic neither admit nor deny

that their aforementioned conduct as stated in Defendant Lewandowski's May 25, 2010 Certification is a violation of the Fraud Act; and

WHEREAS, Defendants Lewandowski and Absolute Chiropractic agree to testify truthfully and provide full cooperation to the Commissioner in this matter; and

WHEREAS, pursuant to N.J.S.A. 17:33A-5d, Defendants Lewandowski and Absolute Chiropractic neither admit nor deny the allegations as stated in the Intervenor-Complaint, but consent to payment of a total of \$25,000.00 ("Settlement Payment") as allocated below; and

IT IS STIPULATED AND AGREED, that Defendants Lewandowski and Absolute Chiropractic shall pay a sum of Twenty Five Thousand Dollars and 00/100 cents (\$25,000.00) to the Commissioner of the New Jersey Department of Banking and Insurance, which consists of civil penalties in the amount of \$20,000.00 as to Defendants Lewandowski and Absolute Chiropractic, jointly and severally, pursuant to N.J.S.A. 17:33A-5b; \$3,000.00 in attorneys' fees, as to Defendants Lewandowski and Absolute Chiropractic, jointly and severally, pursuant to N.J.S.A. 17:33A-5b; and a \$1,000.00 statutory surcharge to Defendant Lewandowski, individually, and a \$1,000.00 statutory surcharge to Defendant Absolute Chiropractic, 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 full payment in the amount of Twenty Five Thousand Dollars and 00/100 cents (\$25,000.00), 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 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 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.

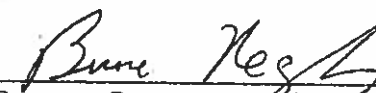
CONSENTED AS TO FORM, CONTENT, AND ENTRY:

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


Dated: 12/8/15

By: 
Kristina Cretella
Deputy Attorney General

Dated: 12/8/15

By: 
Bruce Regenstreich, Esq.
Attorney for Defendants Keith
Lewandowski and Absolute
Chiropractic, P.C.

Dated: 12/8/15

By: 
Keith Lewandowski, D.C.,
Individually and as President and
Registered Agent of Absolute
Chiropractic, P.C.