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Attorney for Plaintiff
R.J. Hughes Justice Complex
25 Market Street
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By: Anna M. Lascurain
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION- BERGEN COUNTY
DOCKET NO. BER-L-2601-22

JUSTIN ZIMMERMAN, ACTING)
COMMISSIONER OF THE NEW)
JERSEY DEPARTMENT OF)
BANKING AND INSURANCE,¹)

Civil Action

Plaintiff,)

STIPULATION OF SETTLEMENT
(as to Antonio Ciccone, M.D.)

v.)

ANTONIO CICCONE, D.O.;)
ANTONIO CICCONE D.O.;)
BRADLEY BODNER, D.O.;)
ALEXANDER ZAITSEV M.D.;)
HIGHLAND MEDICAL GROUP OF)
N.J., P.C. (n/k/a/ MILLENIUM)
MEDICAL GROUP OF N.J.;)
And INTERSTATE MULTI-)
SPECIALTY MEDICAL GROUP,)
P.C.)

Defendants.)

¹ Pursuant to R. 4:34-4, the caption has been revised to reflect the current Acting Commissioner of the Department.

WHEREAS Plaintiff Justin Zimmerman, Acting Commissioner of the New Jersey Department of Banking and Insurance ("Plaintiff"), and Defendant, Antonio Ciccone, M.D., individually, in the matter of Commissioner v. Interstate Multi-Specialty Medical Group, et al. have reached an amicable agreement resolving the issues in controversy, and consented to the entry of the within Stipulation of Settlement ("Stipulation").

WHEREAS, the Parties have determined and hereby agree that settlement is in each of their best interests, and for good cause shown; and

WHEREAS, the Parties consent to the entry of the within Settlement pursuant to the terms and conditions below.

NOW THEREFORE, the Parties agree fully and finally to settle this matter pursuant to the terms and conditions below.

1. Defendant shall pay a to the Commissioner a Settlement Amount that consists of \$7,000.00 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 \$350.00 in statutory surcharges pursuant to N.J.S.A. 17:33A-5.1.

2. Defendant shall pay the Settlement Amount upon the following terms and conditions: Immediately upon execution of this Stipulation by Defendant, Defendant shall remit to the

attorney for the Commissioner a lump sum payment in the amount of \$7,850.00 by certified check, official bank check, or money order made payable to the "Commissioner, New Jersey Department of Banking and Insurance" and sent to:

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

3. No representation, inducement, promise, understanding, condition, or warranty not set forth in this Stipulation has been made to or relied upon by Defendant in agreeing to this Stipulation. Defendant represents that this Stipulation is freely and voluntary entered into without any degree of duress or compulsion.

4. For purposes of construction, this Stipulation shall be deemed drafted by all Parties to this Stipulation and therefore shall not be construed against any Party for that reason in any subsequent dispute.

5. The undersigned counsel and any other signatories represent and warrant that they are fully authorized to execute this Stipulation on behalf of the persons indicated below.

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

If to the Plaintiff:
Anna M. Lascurain, DAG
Banking and Insurance Section
R.J. Hughes Justice Complex
25 Market Street, P.O. Box 117
Trenton, New Jersey 08625-0117

If to the Defendant:
Mr. Robert Carter Pierce, Esq.
3350 NJ-138, Bldg. 1, Suite 113
Wall Township NJ 07719

7. This Stipulation may be executed in counterparts, each of which constitutes an original and all of which constitutes one and the same agreement.

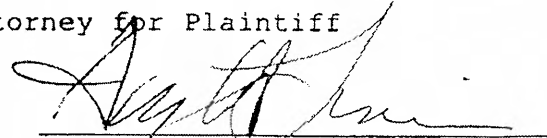
8. The penalties of this Stipulation are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and protection of the public health, safety, and welfare, and are not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

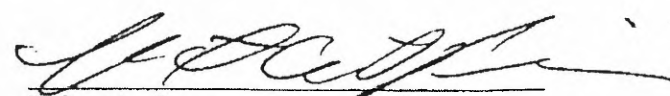
Dated:

By:



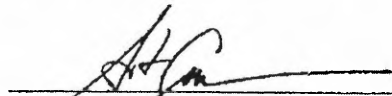
Anna M. Lascurain
Deputy Attorney General

Dated:



Robert Carter Pierce Esq.
Atty. for Antonio Ciccone, M.D.

Dated:



Antonio Ciccone, M.D.