

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff
Richard J. Hughes Justice Complex
P.O. Box 117
Trenton, New Jersey 08625

By: Anna M. Lascurain
Deputy Attorney General
(609) 376-2965
Anna.lascurain@law.njoag.gov
Attorney ID No. 006211994

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - BURLINGTON COUNTY
DOCKET NO. BUR-L-000296-18

MARLENE CARIDE, :
COMMISSIONER OF THE :
NEW JERSEY DEPARTMENT :
OF BANKING & INSURANCE, :
 :
Plaintiff, :
v. :
 :
IVAN KROHN, :
 :
Defendant. :

Civil Action

STIPULATION OF SETTLEMENT

The claim in this action having been settled and resolved by the parties, Marlene Caride, Commissioner of the New Jersey Department of Banking & Insurance ("Plaintiff"), and Ivan Krohn ("Defendant"); and

WHEREAS, Plaintiff filed a Complaint in Burlington County Superior Court alleging violations of the New Jersey

Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. ("Fraud Act"); and

IT IS STIPULATED AND AGREED that Defendant permitted an unlicensed physician, Kevin Lickfield, ("Lickfield") to use his medical license and prescription pad in violation of the Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. ("Fraud Act"); and

IT IS STIPULATED AND AGREED that Defendant did not perform due diligence to see if Lickfield was eligible to practice medicine, and as a result Defendant permitted Lickfield to submit multiple claims on behalf of 13 patients to Aetna Insurance Company of America ("Aetna") in violation of the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. ("Fraud Act"); and

IT IS FURTHER STIPULATED AND AGREED that this conduct constitutes violations of the Fraud Act, and that any future violation of the Fraud Act will be considered a subsequent violation; and

IT IS FURTHER STIPULATED AND AGREED that Defendant, shall pay a lump sum of \$7,941.44 to the New Jersey Department of Banking and Insurance, consisting of \$7,441.44 in civil penalties pursuant to N.J.S.A. 17:33A-5b, and \$500.00 in an insurance surcharge pursuant to N.J.S.A. 17:33A-5.1.; and

IT IS FURTHER STIPULATED AND AGREED that Defendant, shall pay restitution in the amount of \$2,558.56 directly to Aetna Insurance Company as part of this Stipulation of Settlement;

WHEREAS upon the execution of this Stipulation of Settlement, Defendant shall remit to the attorney for the Commissioner a lump sum of \$7,941.44 made payable to "Commissioner, New Jersey Department of Banking and Insurance" in a certified check, money order or attorney trust account check and sent to:

Anna M. Lascurain, Deputy Attorney General
Division of Law, Banking and Insurance Section
RJ Hughes Justice Complex
25 Market Street, 2nd Floor West
P.O. Box 117
Trenton, NJ 08625-0117

IT IS FURTHER STIPULATED AND AGREED that nothing in this Stipulation of Settlement shall prejudice or shall be construed as prejudicing the authority of any other agency or instrumentality of this State or of any other jurisdiction to take such additional regulatory actions under the law, including but not limited to license revocation and assessment of additional monetary fines, penalties and restitution with respect to Defendants and any other licenses, registrations, or any other authorities of Defendants, and any other persons known or not known as of this time, as facts may warrant;

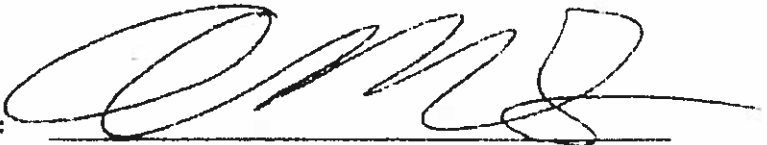
IT IS FURTHER HEREBY STIPULATED AND AGREED that the penalties of this Stipulation of Settlement are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and protection of the public health, safety and welfare, and are not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding;

IT IS FURTHER STIPULATED AND AGREED that pursuant to N.J.S.A. 17:33A-10(c), a copy of this Stipulation of Settlement shall be provided to any appropriate professional licensing authority.

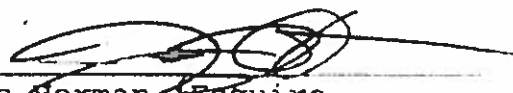
CONSENTED AS TO FORM, CONTENT AND ENTRY:

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

Dated: 9-21-2018

By: 
Anna M. Lascurain
Deputy Attorney General

Dated: 9/25/18

By: 
James Herman, Esquire
On Behalf of Mr. Ivan Krohn