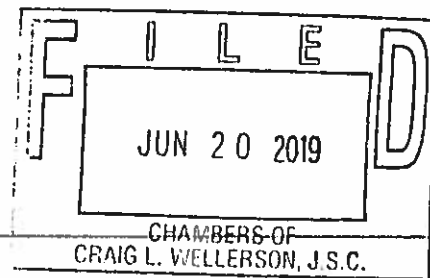


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SUPERIOR COURT OF NEW JERSEY  
 LAW DIVISION - OCEAN COUNTY  
 DOCKET NO. OCN-L-0000019-17

MARLENE CARIDE, COMMISSIONER )  
 OF THE NEW JERSEY DEPARTMENT )  
 OF BANKING AND INSURANCE, ET )  
 AL., )  
 Plaintiffs, )  
 v. )  
 KARIM BANDY, ET AL. )  
 Defendants. )

Civil Action  
 STIPULATION OF SETTLEMENT  
 AND  
 FINAL CONSENT JUDGMENT  
 AS TO  
KARIM BANDY

The claims in this action having been settled and resolved limited to the following two parties: Plaintiff Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner" or "Plaintiff")<sup>1</sup>, and Defendant Karim Bandy ("Defendant") (collectively, "Parties");

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

WHEREAS, for good cause shown, the Parties have reached an agreement resolving the issues in controversy, and consent to the entry of the within Stipulation of Settlement and Final Consent Judgment as to Karim Bandy ("Stipulation") pursuant to the following terms and conditions.

1. Defendant admits that between 2009 and 2014 he knowingly and intentionally engaged in an insurance fraud ring that utilized a network of runners to funnel automobile accident victims to chiropractic and acupuncture clinics he illegally controlled for excessive treatment in exchange for kickbacks, and paid additional illegal kickbacks to medical providers for the referral of patients for diagnostic testing, and paid additional illegal kickbacks to lawyers for the referral of patients for legal representation in third-party claims, all of which resulted in the knowing and intentional filing of thousands of false claims to Plaintiff Allstate New Jersey Insurance Company in violation of the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 to -30 ("Fraud Act").

2. Defendant's aforementioned conduct constitutes multiple violations of the Fraud Act, and any future violation of the Fraud Act shall be considered a subsequent violation.

3. Defendant acknowledges that he pleaded guilty to criminal insurance fraud in the second degrees in July 2015 in violation of N.J.S.A. § 2C:43-3a for the conduct described in

paragraph 2 above, and in July 2017 was sentenced to \$100,000 in fines, \$50,000 in restitution and six years' incarceration. Defendant further acknowledges that the penalties and surcharge ~~assessed under the Fraud Act pursuant to this Stipulation are~~ separate and in addition to any criminal fines and restitution assessed for the same conduct.

4. Defendant agrees that he shall not engage in any future violations of the Fraud Act.

5. Judgment shall be and hereby is entered against Defendant, Karim Bandy, and in favor of Plaintiff, Marlene Caride, Commissioner of the New Jersey Department of Banking and Insurance, in the total amount of \$1,075,000, which shall be filed with the Clerk of the Superior Court as a statewide lien, and consists of \$1,000,000 in civil penalties pursuant to N.J.S.A. 17:33A-5b, \$50,000 in statutory surcharge pursuant to N.J.S.A. 17:33A-5.1, and \$25,000 in attorneys' fees pursuant to N.J.S.A. 17:33A-5b ("Judgment Amount"). The Judgment Amount is due immediately.

6. In conjunction with the execution of this Stipulation, Defendant shall execute a Certification detailing his involvement in the insurance fraud ring described in Paragraph 1.

7. Defendant agrees to provide full, complete, and prompt cooperation with the Commissioner's prosecution of this action against any and all other defendants in this action ("Cooperation"). Cooperation shall include, but not be limited

to: (a) producing voluntarily, and without service of subpoena, all pre-existing information, documents, or other tangible evidence requested by the Commissioner that relates to the ~~allegations or defenses in this action;~~ and (b) and voluntarily answering completely, candidly, and truthfully any and all inquiries relating to the allegations or defenses in this action.

8. The Commissioner shall have the authority to enforce the provisions of this Stipulation or to seek sanctions for violations hereof or both. In such circumstance, the Commissioner shall provide notice and opportunity to cure to Defendant. Such notice shall be given to the person and address designated in the Paragraph 11 by: (a) delivery in person; (b) a nationally recognized next-day courier service; or (c) first class regular or certified mail. Notice so given shall be effective upon: (a) receipt; or (b) on the fifth (5<sup>th</sup>) day following mailing, whichever occurs first.

9. The Commissioner may take any action available under the law of this State to collect the Judgment Amount and enforce this Stipulation, including the assessment of post-judgment interest from the date of the Stipulation, the assessment of any additional attorneys' fees and costs, and any other remedies available under the law.

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

If to the Department:

Richard E. Wegryn, Jr., DAG  
Banking and Insurance Section  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, New Jersey 08625

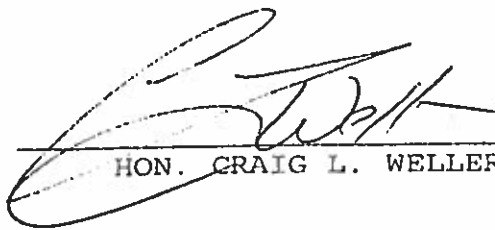
If to Defendant:

Karim Bandy  
141 Crine Road  
Colts Neck, New Jersey 07722

If the Defendant's address changes, he shall provide his full new address to the Department through the person and address designated above within five (5) days.

11. The Judgment Amount, and all attorney's fees and costs incurred by the Commissioner in the enforcement 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.

IT IS ON THE 20 DAY OF 2019 SO ORDERED, ADJUDGED AND DECREED.



HON. CRAIG L. WELLERSON, P.J. CIV.

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

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

Dated: 5/31, 2019

By: Richard E. Wegryn, Jr.  
Richard E. Wegryn, Jr.  
Deputy Attorney General

Dated: 5/17/19, 2019

By: Karim Bandy  
Karim Bandy