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ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiff  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 117  
Trenton, New Jersey 08625-0117

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,<sup>1</sup> )

Civil Action

Plaintiff, )

**STIPULATION OF SETTLEMENT**  
**(as to Bradley Bodner, D.O.)**

v. )

ANTONIO CICCONE, D.O.; PAUL )  
KOSMORSKY, D.O.; BRADLEY )  
BODNER, D.O.; ALEXANDER )  
ZAITSEV M.D.; HIGHLAND )  
MEDICAL GROUP OF NEW )  
JERSEY, P.C. (n/k/a MILLENIUM )  
MEDICAL GROUP OF NEW )  
JERSEY, P.C.; and )  
INTERSTATE MULTI-SPECIALTY )  
MEDICAL GROUP, P.C. )

Defendants. )

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<sup>1</sup> 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, Bradley Bodner, D.O. ("Dr. Bodner," collectively with Plaintiff, the "Parties"), individually, in the above-captioned matter (the "Action"), have reached an amicable agreement resolving the issues in controversy, and hereby consent 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. Dr. Bodner shall pay to Plaintiff a Settlement Payment in the amount of \$5,250, consisting of \$5,000.00 in civil penalties pursuant to N.J.S.A. 17:33A-5(b); and \$250.00 in statutory surcharge pursuant to N.J.S.A. 17:33A-5.1.

2. This Stipulation represents a negotiated settlement and shall not be construed as an admission of liability or wrongdoing by Dr. Bodner or a finding that Dr. Bodner has violated the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq. Dr. Bodner denies the allegations against him as set forth in

Plaintiff's Complaint, and hereby affirms that he has agreed to pay the Settlement Payment as a business decision only (i.e., solely to avoid incurring additional legal fees).

3. No later than seven business days of the Parties' execution of this Stipulation, Dr. Bodner shall remit, or he shall cause his undersigned attorney to remit, to the attorney for the Plaintiff a lump sum payment in the amount of \$5,250.00 by certified check, official bank check, or money order, or check from the Attorney Trust Account of The Salloum Law Firm LLC, 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

Alternatively, the check may also be sent to Ms. Lascurain by way of courier to 25 Market Street, Second Floor, Trenton, New Jersey 08625-0117.

4. Upon the full execution of this Agreement by the signatories below, Dr. Bodner and Plaintiff, through their respective undersigned counsel, shall file a stipulation of dismissal, pursuant to R. 4:37-1(a), dismissing the Complaint with prejudice against Dr. Bodner, and Plaintiff shall immediately, withdraw, with prejudice, the motion submitted to the Court on September 14, 2023.

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

6. 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 regarding its terms.

7. 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.

8. All communications from any party concerning the subject matter of this Stipulation shall be addressed as follows and shall be sent via email and certified mail (or other means of mailing that provides proof of delivery):

<p>If to Plaintiff:</p> <p>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</p> <p>Email:</p> <p><a href="mailto:Anna.Lascurain@law.njoag.gov">Anna.Lascurain@law.njoag.gov</a></p>	<p>If to Dr. Bodner:</p> <p>Christopher Salloum, Esq.                  The Salloum Law Firm LLC                  1700 State Route 23                  Suite 210                  Wayne, New Jersey 07470</p> <p>Email:  <a href="mailto:chris@thesalloumlawfirm.com">chris@thesalloumlawfirm.com</a></p>
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9. This Stipulation may be executed in counterparts, each of which constitutes an original and all of which constitutes one and the same agreement.

12. The Settlement Amount set forth in this Stipulation is 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 is not intended to constitute a debt 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

*Anna M. Lascurain*

By: \_\_\_\_\_  
Anna M. Lascurain  
Deputy Attorney General

Dated: October 18, 2023

THE SALLOUM LAW FIRM LLC  
Attorney for Dr. Bodner



By: \_\_\_\_\_  
Christopher Salloum, Esq.  
Attorney ID No. 047842013

Dated: October 18, 2023

DocuSigned by:



\_\_\_\_\_  
Bradley Bodner, D.O.

Dated: 10/18/2023