

RECEIVED
STATE OF NEW JERSEY
OFFICE OF ADMIN. LAW

APR 14 10 18 AM '97

PETER G. VERNIERO
Attorney General of New Jersey
Attorney for The New Jersey Board
of Chiropractic Examiners
R.J. Hughes Justice Complex
CN 117
Trenton, NJ 08625

By: Lee Barry
Senior Deputy Attorney General
(609) 984-8469

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF CHIROPRACTIC EXAMINERS
OAL DOCKET NO. BDSCE 12304-94N

_____ :

IN THE MATTER OF THE SUSPENSION :
OR REVOCATION OF THE LICENSE OF :

STEVEN VERCHOW, D.C. :
LICENSE NO. MCO1305 :

and :

ALEXANDER KUNTZEVICH, D.C. :
LICENSE NO. MCO1451 :

TO PRACTICE CHIROPRACTIC IN THE :
STATE OF NEW JERSEY :

**CONSENT ORDER AND
STIPULATION OF DISMISSAL
PURSUANT TO N.J.A.C.
1:1-19-1(c)**

_____ :

This matter came before the Court on the application of Lee Barry, Esq., Senior Deputy Attorney General for the State of New Jersey, Department of Law & Public Safety, Division of Consumer Affairs, attorney for the State Board of Chiropractic Examiners ("The Board") in this matter. Zulima V. Farber, Esq. and Richard D. Wilkinson, Esq. appeared for Respondents, Dr. Steven Verchow, D.C. and Dr. Alexander Kuntzevich, D.C.

The Board, by its counsel, filed a complaint against Respondents in this matter in October 1994, and filed an amended complaint in June 1995 seeking to suspend or revoke the licenses issued to Respondents to practice chiropractic in the State of New Jersey, and to obtain certain monetary and other relief from Respondents, based on alleged violations of various statutes and regulations governing the practice of chiropractic.

After several days of hearings in January and February 1996, the parties engaged in settlement discussions, and have reached a settlement of this administrative proceeding, as well as other related litigation, on the terms set forth in an agreement entitled Settlement Agreement and Releases dated March 31, 1997 (the "Settlement Agreement"). A true copy of the Settlement Agreement is attached hereto as Exhibit A, and is incorporated by reference herein. Pursuant thereto, with the consent and approval of all parties and their counsel, this proceeding is settled on the following terms and conditions:

1. Respondents make the admissions to the Board that are set forth in the Settlement Agreement.
2. As required by the Settlement Agreement, Respondents shall pay to the State the sum of \$750,000.00, part of which the State intends to allocate to the Board, on the terms and conditions more particularly set forth in the Settlement Agreement.
3. Respondents' chiropractic licenses (License Nos. MC01305 and MC01451, respectively) are hereby revoked, with a restriction barring application for relicensure for a period of five years. In recognition of the fact that the Verchow and Kuntzevich Clinics and Diagnostic Entities have been closed since February 1993, and in recognition of the fact that the individual private chiropractic practices of Verchow and Kuntzevich closed in December 1993 and February 1994 respectively, Verchow shall have the right to apply for relicensure on or after January 1, 1999, and Kuntzevich shall have the right to apply for relicensure on or after March 1, 1999.
4. In consideration of the foregoing and the additional promises and considerations set forth in the Settlement Agreement, this proceeding is hereby dismissed

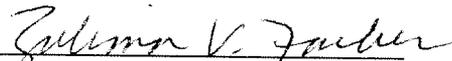
with prejudice (subject to the State's remedies in the event of a default) and without further costs, attorneys' fees or other payments by Respondents to the Board, and without any admissions of liability or wrongdoing except as set forth in the Settlement Agreement.

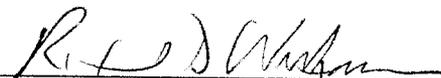


ELINOR R. REINER, A.L.J.

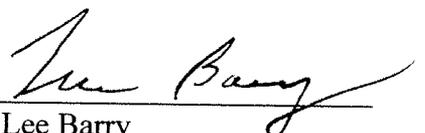
The undersigned parties, by their attorneys, hereby consent and agree to be bound by the terms of this Consent Order

LOWENSTEIN, SANDLER, KOHL,
FISHER & BOYLAN
Attorneys for Respondents

By: 
Zulima V. Farber

By: 
Richard D. Wilkinson

PETER G. VERNIERO
Attorney General of New Jersey
Attorney for The New Jersey Board of
Chiropractic Examiners

By: 
Lee Barry
Senior Deputy Attorney General