

I. MARK COHEN, ESQ.
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FILED WITH THE BOARD OF
PSYCHOLOGICAL EXAMINERS
ON November 26, 2008

Attorney for Alvin Krass, Psy. D.

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

ALVIN KRASS, PSY.D.

LICENSE NO. 275

TO PRACTICE PSYCHOLOGY IN THE
STATE OF NEW JERSEY

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF PSYCHOLOGICAL
EXAMINERS

DOCKET NO.

Administrative Action

ANSWER TO COMPLAINT

Respondent, Alvin Krass, Ph.D., maintaining a place of business at 4 Hartford Drive, Suite 2, Boro of Tinton Falls, County of Monmouth, State of New Jersey, by way of answer to complaint:

ALLEGATIONS COMMON TO ALL COUNTS

1. Respondent admits the allegations of paragraph 1, 2, 3 and 4, except respondents degree is a doctorate in psychology, Ph.D.

COUNT I

1. Respondent repeats and realleges the Allegations Common to all Counts as if set forth at length.

2. Respondent admits the allegations of paragraph 2.

3. Respondent admits part of paragraph 3. Respondent entered into a financial relationship with BN.

4. Respondents neither admits nor denies the allegations of paragraph 4 and puts Complainant to its proof.

5. Respondent admits the allegations of paragraph 5.

6. Respondent admits the allegations of paragraph 6 and 7.

7. Respondents denies the allegations of paragraph 8 and 9.

COUNT II

1. Respondent repeats and realleges the Allegations Common to all Counts and Count I as if set forth at length.

2. Respondent neither admits nor denies the allegations of paragraph 2, but puts Complainant to its truth.

3. Respondent denies the allegations of paragraph 3.

SEPARATE DEFENSES

1. Respondent has prior to the initiation of this action satisfied his financial obligation to BN.

2. Respondents conduct does not warrant license revocation.

3. Respondent had a valid professional reason for entering into the transaction.

4. The provisions of N.J.S.A. 45:1-21(e) and (h) are too broad to be applied in this action. The intention of N.J.A.C 13:42-10.13 (e) and (f) is not absolute and does not require revocation of Respondents license to practice psychology.

5. The Board of Psychological Examiners was utilized as a debt collection devise. Respondent except of this conduct with BN has had an otherwise unblemished professional record.

WHEREFORE, Respondent demands an Order dismissing the Complaint with prejudice.

Date: November 24, 2008

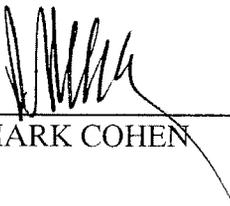


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CERTIFICATION

Pursuant to R. 4:5-1, Respondent, by way of his attorney, hereby certifies that the matter in controversy is not the subject of any pending or contemplated proceeding. Plaintiff is not aware of any other parties that should be joined in this action

Date: November 24, 2008



I. MARK COHEN

CERTIFICATION OF MAILING

I hereby certify that the original and one copy of the Answer to Complaint have been filed within the time and manner as prescribed by the Rules of court with J. Michael Walker, Executive Director of the Board of Psychological Examiners, P.O. Box 4501, Newark, New Jersey 07101 and Kim D. Ringler, Deputy Attorney General, Attorney General of New Jersey, Division of Law, 124 Halsey Street, P.O. Box 45029, Newark, New Jersey 07101, by certified mail return receipt requested and regular mail postage prepaid.

Dated: November 24, 2008


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