



CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

New Jersey Office of the Attorney General

Division of Consumer Affairs
State Board of Mortuary Science of New Jersey
124 Halsey Street, 6th Floor, Newark, NJ 07102



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Acting Director

Mailing Address:
P.O. Box 45009
Newark, NJ 07101
(973) 504-6425

May 12, 2016

By Certified and Regular Mail

Andrea Ippolito, Manager
Paul Ippolito Berkeley Memorial
646 Springfield Avenue
Berkeley Heights NJ 07922

Re: Uniform Penalty Letter in Lieu of Formal Disciplinary Complaint
Our File #16-35, 23JB00074000

Dear Andrea Ippolito:

This letter is to advise you that the New Jersey State Board of Mortuary Science (the "Board") has had an opportunity to review your matter regarding the reinstatement application, in which Paul Ippolito Berkeley Memorial was operating without a registration from January 1, 2016 to February 22, 2016.

Upon review of all available information, the Board has found that you have violated **N.J.A.C.13:36-4.1(a) (b)**, in that you failed to renew Paul Ippolito Berkeley Memorial certificate of registration prior to the expiration date. More specifically, Paul Ippolito Berkeley Memorial conducted (20) twenty funerals after the certificate of registration had expired.

The Board has determined that it will first offer you an opportunity to settle this matter and thereby avoid the initiation of formal disciplinary proceedings. Should you wish to avail yourself of this opportunity, you should pay the penalty of **\$2,000.00** by certified check or money order, made payable to the State of New Jersey within **fifteen (15) days of receipt of this letter**. The penalty must be accompanied by the enclosed certification and mailed to the State Board of Mortuary Science, P.O. Box 45009, Newark, New Jersey, 07101.

Alternatively, you may waive your right to a hearing and submit a written statement or explanation to the Board. The Board will then consider your submission and render a final decision, which may include any of the terms set forth above. Any disposition by way of a settlement will be a public record, and will have the same effect as an order of the Board. Any failure to comply with the terms to which you agree will be deemed a violation.

Page2

Andrea Ippolito, Manager
Paul Ippolito Berkeley Memorial

If you do not wish to settle this matter, you may request a hearing. In that event, this letter will serve as notice of the charges against you and a hearing will be scheduled before the Board. At the hearing, either personally or with the assistance of an attorney, will have an opportunity to respond to the charges, submit evidence and present testimony as may be necessary in order for the Board to make a final determination concerning the charges of unlawful activity. You should be aware that in making its final decision, the Board may, if unlawful activity has been proven, assess civil penalties in an amount greater than that offered in this letter. Additionally, the Board may, if the facts are found to so warrant, enter an order requiring you to reimburse certain monies, directing you to cease and desist from engaging in unlawful acts and/or requiring you to pay costs incurred in the matter.

Should you have any questions concerning this letter of the settlement offer herein, I suggest that you contact Deputy Attorney General Meaghan Goulding, who may be reached at (973) 648-4741.

The enclosed certification should be completed and returned to the Board within fifteen (15) days following your receipt of this letter. In the event that the Board receives no response from you within fifteen (15) days, the Board's settlement offer will be withdrawn, and you will be deemed in default. The allegations against you will be deemed uncontested. The Board will then proceed to schedule the matter for final review and will enter an appropriate order. Once an order has been entered, your failure to pay any penalties may result in further action to suspend or revoke your registration.

NEW JERSEY STATE
BOARD OF MORTUARY SCIENCE

By: 
Quin Archer
Executive Director