

NEW YORK STATE DEPARTMENT OF HEALTH  
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

IN THE MATTER  
OF  
JOHN CLEMENTE, M.D.

COMMISSIONER'S  
ORDER OF  
SUMMARY  
ACTION

TO: John Clemente, M.D. John Clemente, M.D. John Clemente, M.D.

John Clemente, M.D. John Clemente, M.D.  
Heart Medicine  
164 State Route 35  
Eatontown, NJ 07724

The undersigned, Howard A. Zucker, M.D., J.D., Commissioner of Health, pursuant to N.Y. Public Health Law §230, upon the recommendation of a Committee on Professional Medical Conduct of the State Board for Professional Medical Conduct, has determined that the duly authorized professional disciplinary agency of another jurisdiction, the State of New Jersey, has made a finding substantially equivalent to a finding that the practice of medicine by **John Clemente, M.D.**, Respondent, New York license number 156026, in that jurisdiction constitutes an imminent danger to the health of its people, as is more fully set forth in the Consent Order, dated June 10, 2015, and the Verified Complaint, dated April 30, 2015, of the State of New Jersey, Department of Law and Public Safety, Division of Consumer Affairs, State Board of Medical Examiners, attached hereto as Appendix "A" and made a part hereof.

It is therefore:

ORDERED, pursuant to N.Y. Public Health Law §230(12)(b), that effective immediately, Respondent shall not practice medicine in the State of New York, or practice in any setting under the authority of Respondent's New York license.

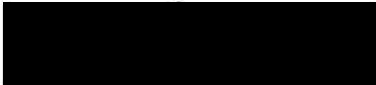
Any practice of medicine in violation of this Order shall constitute Professional Misconduct within the meaning of N.Y. Educ. Law §6530(29) and may constitute unauthorized medical practice, a Felony defined by N.Y. Educ. Law §6512.

This Order shall remain in effect until the final conclusion of a hearing which shall commence within thirty days after the final conclusion of the disciplinary proceeding in the predicate action. The hearing will be held pursuant to the provisions of N.Y. Pub. Health Law §230, and N.Y. State Admin. Proc. Act §§301-307 and 401. The hearing will be conducted before a committee on professional conduct of the State Board for Professional Medical Conduct on a date and at a location to be set forth in a written Notice of Hearing or Notice of Referral Proceeding to be provided to the Respondent after the final conclusion of the proceeding in the predicate action. Said written notice may be provided in person, by mail, or by other means. If Respondent wishes to be provided said written notice at an address other than that set forth above, Respondent shall so notify, in writing, both the attorney whose name is set forth in this Order, and the Director of the Office of Professional Medical Conduct, at the addresses set forth below.

Respondent shall notify the Director of the Office of Professional Medical Conduct, New York State Department of Health, Riverview Center, 150 Broadway, Suite 355, Albany, New York 12204-2719 via Certified Mail, Return Receipt Requested, of the final conclusion of the proceeding in the predicate action, immediately upon such conclusion.

THE NEW YORK PROCEEDINGS MAY RESULT IN A DETERMINATION THAT YOUR LICENSE TO PRACTICE MEDICINE IN NEW YORK STATE BE REVOKED OR SUSPENDED, AND/OR THAT YOU BE FINED OR SUBJECT TO OTHER SANCTIONS SET FORTH IN NEW YORK PUBLIC HEALTH LAW §230-a. YOU ARE URGED TO OBTAIN AN ATTORNEY TO REPRESENT YOU IN THIS MATTER.

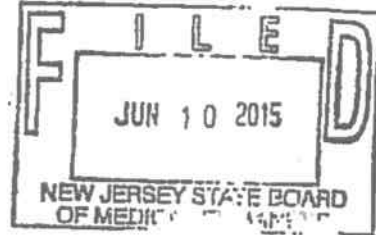
DATED: Albany, New York  
February 24, 2016

  
Howard A. Zucker, M.D., J.D.  
Commissioner of Health  
New York State Department of Health

Inquiries should be directed to:

Ian Silverman  
Associate Counsel  
Bureau of Professional Medical Conduct  
Corning Tower – Room 2512  
Empire State Plaza  
Albany, New York 12237

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By: Kathy Stroh Mendoza  
Deputy Attorney General  
Telephone (973) 648-2779

STATE OF NEW JERSEY  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
STATE BOARD OF MEDICAL EXAMINERS

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IN THE MATTER OF THE SUSPENSION	:	Administrative Action
OR REVOCATION OF THE LICENSE OF	:	
	:	CONSENT ORDER
JOHN S. CLEMENTE, M.D.	:	
LICENSE NO. 25MA 52589	:	
	:	
TO PRACTICE MEDICINE AND SURGERY	:	
IN THE STATE OF NEW JERSEY	:	

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This matter was opened to the New Jersey State Board of Medical Examiners ("Board") upon the filing of a Verified Complaint and Order to Show Cause on April 30, 2015, with a return date of May 13, 2015. The Verified Complaint was filed based upon the testimony of John S. Clemente ("Respondent") at an Investigative Inquiry on February 23, 2011, review of reports of loss of hospital privileges at Jersey Shore University Medical Center and Riverview Medical Center; inspection reports of Respondent's office, Heart Medicine LLC, 55 North Gilbert Street, Tinton Falls, New Jersey by

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Safeguard Services LLC, contractors for the Centers of Medicare and Medicaid Services, and by the Enforcement Bureau, Division of Consumer Affairs, in February and March 2015; and police reports from Colts Neck Police Department.

The Verified Complaint alleges that Respondent's personal health indicates he is incapable for medical or any other good cause, of discharging the functions of a licensee in a manner consistent with the public's health, safety and welfare, and there is a basis pursuant to N.J.S.A. 45:1-21(i) to suspend his license. As such, Respondent presents a clear and imminent danger to the public, warranting a temporary suspension of his license to practice medicine, pursuant to N.J.S.A. 45:1-22. An Interim Order was filed on June 4, 2015, nunc pro tunc May 13, 2015, in which Respondent agreed to the temporary suspension of his license to practice medicine and surgery until the Acting Attorney General's application was considered by the Board at its next regularly scheduled meeting or another date mutually agreed upon by the parties or ordered by the Board.

The parties being desirous of entering into an interim resolution of this matter, which alleges a palpable demonstration of an imminent danger to the public, and it appearing that Respondent has read the terms of the within Order and understands their meaning and effect and consents to be bound by same, and the Board finds that the within disposition is adequately protective of

the public health, safety and welfare, and for good cause shown,

IT IS ON THIS 10<sup>th</sup> \_\_\_\_\_ DAY OF JUNE, 2015,

ORDERED THAT:

1. Respondent agrees to voluntarily surrender his license to practice medicine and surgery in all jurisdictions with such surrender to be deemed a temporary suspension. This temporary suspension shall remain in effect until the resolution of the plenary hearing and further Order of the Board or until Respondent makes application to the Board or a Committee thereof to demonstrate his fitness and competency to practice medicine and surgery in the State of New Jersey and further Order of the Board.

The criteria for demonstration for fitness shall be determined by the Board and the Board may at that time require any additional evaluation or coursework. Effective immediately, Respondent shall not accept any new patients to his practice located at 55 North Gilbert Street, Building <sup>One</sup> 3, Tinton Falls, New Jersey 07701 nor shall he make any appointments with current patients.

2. This Interim Consent Order is without any admissions of liability or wrongdoing by Respondent and without prejudice to any response or defense Respondent may raise to the Acting Attorney General's application.

3. During the time Respondent's license is temporarily suspended, he shall cease and desist all patient contact at any location and the rendering of medical care, including the issuance

of any prescriptions for, or dispensation of, medications of any kind, including but not limited to Controlled Dangerous Substances.

4. During the time Respondent's license is temporarily suspended, he shall not enter the premises of his medical practice during business hours when patients may be present.

5. During the time Respondent's license is temporarily suspended, he shall not charge, receive or share in any fee for professional services rendered by him or others while barred from engaging in the professional practice of medicine. Respondent shall be permitted to collect account receivables with respect to professional services that he rendered prior to the date of the filing of this Order.

6. Respondent shall return his original New Jersey medical license, current biennial registration, and CDS registration to the New Jersey State Board of Medical Examiners, P.O. Box 183, Trenton, New Jersey 08625-0183.

7. Respondent shall immediately advise the Drug Enforcement Agency ("DEA") of this Order, and provide the Board within five days of proof of said notification to the DEA.

8. Respondent shall comply with the Directives Regarding Licensees who have been disciplined, which is attached hereto and made a part hereof.

9. The parties hereby stipulate that entry of this Order is without prejudice to further action, investigation, and prosecution

by this Board, the Acting Attorney General, the Drug Control Unit, the Director of the Division of Consumer Affairs or other law enforcement entities resulting from Respondent's conduct prior to the entry of this Order. Nothing in this Order shall limit the prosecution of the Verified Complaint filed on April 30, 2015.

10. The Board shall retain jurisdiction to enforce the terms of this Order. Upon receipt of any reliable information indicating that Respondent has violated any term of this Order, the Board reserves the right to bring further disciplinary action.

NEW JERSEY STATE BOARD OF  
MEDICAL EXAMINERS

By: \_\_\_\_\_

Stewart A. Berkowitz, M.D.  
President

I have read and understood  
the within Order and agree to  
be bound by its terms.

\_\_\_\_\_  
John S. Clemente, M.D.

Date: 6/18/15

Consent is hereby given  
as to the form and entry of  
this order.

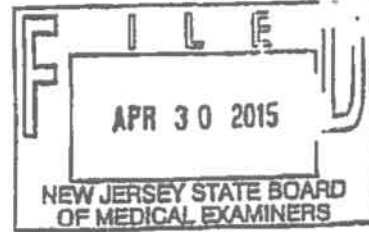
\_\_\_\_\_  
Stephen Pascarella, Esq.  
Attorney for the Respondent

Date: June 10, 2015



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Attorney ID. 018561990



STATE OF NEW JERSEY  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
STATE BOARD OF MEDICAL EXAMINERS

IN THE MATTER OF THE SUSPENSION :  
OR REVOCATION OF THE LICENSE OF : Administrative Action  
 :  
 : VERIFIED COMPLAINT  
 :  
 JOHN S. CLEMENTE, M.D. :  
 LICENSE NO. 25MA 52589 :  
 :  
 TO PRACTICE MEDICINE AND SURGERY :  
 IN THE STATE OF NEW JERSEY :  
 :

JOHN J. HOFFMAN, Acting Attorney General of New Jersey, by  
Kathy Stroh Mendoza, Deputy Attorney General, with offices located  
at 124 Halsey Street, Newark, New Jersey 07101, by way of Verified  
Complaint says:

GENERAL ALLEGATIONS

1. Complainant Attorney General of New Jersey is charged  
with the responsibility of enforcing the laws of the State of New

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Jersey pursuant to N.J.S.A. 52:17A-40(h) and is empowered to initiate administrative disciplinary proceedings against persons licensed by the New Jersey State Board of Medical Examiners pursuant to N.J.S.A. 45:1-14 et seq.

2. The New Jersey State Board of Medical Examiners ("Board") is charged with the duty and responsibility of regulating the practice of medicine and surgery in the State of New Jersey pursuant to N.J.S.A. 45:9-1 et seq. and N.J.S.A. 45:1-14 et seq.

3. Respondent John S. Clemente, M.D. ("Respondent") is and has been at all times pertinent to this Verified Complaint, licensed to practice medicine and surgery in the State of New Jersey and holds license number 25MA52589. (Certification of Kathy Mendoza, D.A.G. ("Mendoza Cert.") Exhibit A C.V. of Dr. Clemente).

4. Respondent is Board certified in internal medicine (1986) and cardiovascular disease (1993-2003). (Mendoza Cert. Exhibit B-American Board Certification).

5. Respondent maintains a solo medical practice, Heart Medicine LLC, at 55 North Gilbert Street, Building 3, Tinton Falls, New Jersey 07701. (Mendoza Cert. Exhibit C letterhead).

6. Respondent previously maintained a medical office at 164 Highway 35, Eatontown, New Jersey 07724. (Mendoza Cert. Exhibit D Transcript of February 23, 2011 hearing before a Committee of the Board, page 10). From 1987 to 2009, he was a member of a

multimember practice, Heart Center PC with offices in Eatontown, Howell, and Hazlet, New Jersey. (Mendoza Cert. Exhibit D page 9).

7. Beginning in September 2011, Respondent resided at 2 Lexington Court, Colts Neck, New Jersey where he rented with an agreement to purchase. In October 2014, he was evicted when he stopped making payments following a massive heart attack in April 2013. (Mendoza Cert. Exhibit E Colts Neck report #14CN 10321)

8. Respondent currently resides at 20 Pilgrim Way, Colts Neck, New Jersey (Mendoza Cert. Exhibit F Colts Neck Police report #15CN 01074)

9. Respondent appeared and testified before a Committee of the Board on February 23, 2011 regarding a concern over delay in patient care. (Mendoza Cert. Exhibit D).

10. Respondent does not hold any hospital privileges.

11. Respondent previously held hospital privileges at Bayshore Community Hospital (formerly Meridian, now R.W. Johnson Univ. Hospital) in Holmdel, N.J; Monmouth Medical Center (St. Barnabas Health Care System), Long Branch, N.J; Riverview Medical Center (Meridian Health Systems) in Red Bank, N.J; and Jersey Shore University Medical Center (Meridian Health Systems) in Neptune, N.J. (Mendoza Cert. Exhibit D page 11).

12. Respondent voluntarily surrendered his privileges at Bayshore Community Hospital and Monmouth Medical Center. (Mendoza Cert. Exhibit D page 11)

13. On June 5, 2013, due to serious concerns about several issues concerning patient care and professionalism, Dr. Clemente's privileges at Jersey Shore University Medical Center, a Meridian facility, were summarily suspended. (Mendoza Cert. Exhibit H Records from Jersey Shore University Medical Center).

14. Jersey Shore University Hospital Center filed an Adverse Action report with the Medical Review Panel of the Board. Supplemental reports were provided to the Panel on September 2013. (Mendoza Cert. Exhibit H).

15. On June 13, 2013, due to serious concerns about several issues regarding patient care and professionalism, Dr. Clemente's privileges were summarily suspended at another Meridian facility, Riverview Medical Center. (Mendoza Cert. Exhibit I).

16. On January 27, 2015, following an investigation and interview, Jersey Shore University Hospital reached a final decision as to revocation of Respondent's clinical privileges. Substandard or inadequate care was invoked as the basis for action, as Dr. Clemente was perceived as an "immediate threat to health or safety." (Mendoza Cert. Exhibit J).

17. Initials are being used in this Complaint to protect the confidentiality of the patients referenced herein. The patients' identities have been made known to Respondent and to the Board.

COUNT ONE  
INCAPACITY TO PRACTICE

18. Complainant hereby incorporates all General Allegations as if fully alleged herein.

19. On March 27, 2015, the Enforcement Bureau received a telephone call from the Colts Neck Police Department, who subsequently provided copies of 49 reports involving Respondent from November 15, 2005 through March 27, 2015 (Mendoza Cert. Exhibit K Colts Neck Police certification and index.)

20. On February 16, 2015, Safeguard Service LLC ("Safeguard") investigators, contractors of Centers for Medicare and Medicaid ("CMS") responsible for carrying out Medicare Program safeguard activities, made an unannounced onsite inspection and review of Dr. Clemente's Tinton Falls office. (Certification of Enforcement Bureau's Nisha Nicoletti, R.N., Investigator II ("Nicoletti Cert."), Exhibit C).

21. Safeguard's inspection followed from a complaint from an ex-employee of Dr. Clemente who wrote about Dr. Clemente's own health and the way he was running his office practice. Denise Giangrante, who had worked at Heart Medicine from December 2013 to April 2014 as medical manager, complained that Dr. Clemente was rude, obnoxious and disrespectful to his patients (Nicoletti Cert. Exhibit A). She opined that he was possibly mentally ill.

(Nicoletti Cert. Exhibit A). She confirmed he had a history of diabetes mellitus and a heart condition. (Nicoletti Cert. Exhibit A). She stated he was not HIPAA compliant (Nicoletti Cert. Exhibit A).

22. Safeguard's investigators found Dr. Clemente's ability to appropriately and safely treat patients was of "immediate concern." (Nicoletti Cert. Exhibit C).

23. Safeguard's investigators interviewed Dr. Clemente in his medical office during office hours. (Nicoletti Cert. Exhibit C).

24. His overall physical appearance was disheveled. He was seated behind a desk with his bandaged feet propped on pillows with stains of sanguineous fluid, wearing podiatric "boots." (Nicoletti Cert. Exhibit C). He was dressed in soiled sweat pants too large for his body. He was unshaven and the right side of his face appeared to sag. He smelled strongly of urine (Nicoletti Cert. Exhibit C).

25. Dr. Clemente was unable to independently ambulate. Two of his staff were needed to assist him to stand and pivot to be placed in a wheelchair. (Nicoletti Cert. Exhibit C).

26. During their inspection on February 16, 2015, Safeguard observed patients being treated by Respondent. They noted that two patients were taken separately into an unclean exam room to see Respondent. Both exited within a very short period of time. Nothing in the room was changed after the patients left. The exam

table remained in an upright position at a 90 degree angle, apparently unused. (Nicoletti Cert. Exhibit C).

27. During the two hour inspection, Dr. Clemente became ashen and short of breath to the extent that it caused the investigator to inquire if medical intervention was needed. He denied any need. (Nicoletti Cert. Exhibit C).

28. During the onsite inspection, Dr. Clemente's mental status change dramatically, vacillating between pleas to assist him in rectifying his issues with Medicare, to angry profane-ridden outbursts directed to investigators, his office staff, and a presumed patient in the waiting room. His abrupt mood swings, profane language and focused tirades compounded the investigators' concerns as to his ability to safely function as a medical practitioner at this time. (Nicoletti Cert. Exhibit C).

29. Ex-employee Jerelyn Lantier reported to the Enforcement Bureau investigator "[t]his doctor is totally unprofessional. He pees in the garbage can that is in his exam room in between patients and leaves it there, does not (sic) change his clothes or showers. His foot is rotting off and smells. He is very rude and screams at his employees." (Nicoletti Cert. Exhibit D).

30. Respondent was hospitalized at Robert Wood Johnson University Hospital from February 20 to 25, 2015. (Nicoletti Cert. Exhibit G). His chief complaint was heart failure and right leg pain. Bhavi Patel, M.D. diagnosed acute coronary syndrome, acute

renal failure, hepatic cirrhosis, diabetes, edema, hyponatremia, atrial fibrillation and hypertension. (Nicoletti Cert. Exhibit G).

31. The Admission note by Dr. Patel states that Respondent is a "poor historian" and has been "non-compliant with treatment for all medical conditions for over ten years, per family." His son reported that Respondent has "deteriorated significantly over the last three years due to family issues...has seen no doctors and has been essentially treating himself at home with unknown medications taking (sic) only intermittently." (Nicoletti Cert. Exhibit G).

32. The Admission note continues "[f]amily notes an increase in confusion over the last few weeks with [Respondent] appearing unable to continue to care for his patients in addition to increased abdominal distention and some shortness of breath. Son states he is no longer able to care for himself at home, has poor hygiene and dentition and appears severely depressed." (Nicoletti Cert. Exhibit G).

33. Discharge diagnosis was ascites (accumulation of serous fluid in the peritoneal cavity, most commonly encountered with heart failure and portal hypertension), all other diagnoses remaining the same. (Nicoletti Cert. Exhibit G).

34. The Enforcement Bureau attempted an inspection of Heart Medicine in Tinton Falls on February 24, 2015. The doors were locked. (Nicoletti Cert. Para. 15) The manager of the building stated that Respondent had not paid his rent since December 2014



and had been locked out. On February 23, 2015 he paid a portion of the outstanding rent and retrieved his keys. Respondent intended to reopen his office the first week of March 2015. (Nicoletti Cert. Para. 16 and 17).

35. On March 9, 2015 the Enforcement Bureau conducted an inspection. (Nicoletti Cert. Para. 19).

36. Respondent wore a loose pair of sweat pants, a large sweat shirt, socks and closed toe slippers. His skin was pale, and he did not get out of the chair in his office/exam room except once to go to the restroom. He moved very slowly with assistance. (Nicoletti Cert. Para. 20).

37. The floors were dirty, medical waste was piled in a corner. No certificates were displayed. The certificate for the centrifuge CLIA had expired five years earlier. (Nicoletti Cert. Para. 21).

38. Respondent uses his office as an examination room. There is one examining table with wrinkled paper on it. When investigators asked Respondent to step out of the room so that they could photograph it, he declined. (Nicoletti Cert. Para. 22).

39. During the inspection, Respondent saw five patients in his office/exam room. Respondent kept the exam room door open while speaking with these patients. Investigators noted that Respondent did not rise from his chair to check vital signs or assess the patients who were seated on a chair adjacent to his own. In each

case, Respondent had a brief conversation with each patient and gave each prescriptions to refill. The paper on the exam table remained wrinkled and untouched from one patient to the next. The stethoscope on a dusty window sill remained untouched. (Nicoletti Cert. Para. 23-25).

40. The records of these five patients (P.R, D.H, K.R., A.S. and M.P.) were obtained by subpoena. (Nicoletti Cert. Exhibit F) For four patients, the records documented that Respondent had performed a complete head-to-toe physical examination, obtained vital signs and weight, documented chief complaints and diagnosis and plan for treatment, and refilled prescriptions. For patient M.P, he wrote 2 prescriptions, including one for hydrocodone (CDS II), although no assessment was documented. (Nicoletti Cert. Para. 26).

41. During the inspection, Dr. Clemente was initially cooperative. However, he became angry and called the Deputy Attorney General to tell her that "your people are rummaging through my office" while there was a patient sitting in front of him. He began screaming at the investigators and asked them to stop opening drawers without one of his employees present. (Nicoletti Cert. Para. 27).

42. On March 12, 2015, Colts Neck Police Department received a phone call in reference to Respondent, a litigant in the court of Paul X. Escandon, Judge, Superior Court, Monmouth County

Courthouse, Freehold. Respondent's case was adjourned and he could not make the walk back to his car. Freehold First Aid was dispatched to assess Respondent. A few minutes later, Respondent walked to his car assisted by security officer from the courthouse. (Mendoza Cert. Exhibit J Colts neck Police report 15S0 02504).

43. On March 21, 2015, Respondent slipped on gravel and fell outside his office at 55 North Gilbert Street, Tinton Falls. He complained of hand and abdominal pain. He was transported to Monmouth Medical Hospital. (Mendoza Cert. Exhibit M Colts Neck Police report 15TF04231).

44. On March 23, 2015, Respondent's vehicle was found disabled and he had been driving with a suspended license and expired registration. There was a warrant out for his arrest. The car was impounded. (Mendoza Cert. Exhibit N Colts Neck Police report 15CN02116).

45. In a subsequent mug shot when photographed at Colts Neck police headquarters, Respondent took the cord from his sweatpants and put it around the back of his neck like a noose. (Mendoza Cert. Exhibit O mug shot forwarded by Colts Neck Police Department)

46. On March 24, 2015, Colts Neck police found Respondent in his car complaining of chest pain and trouble breathing. He screamed to be left alone and refused medical attention and locked himself in his car. (Mendoza Cert. Exhibit P Colts Neck Police report 15CN02144).

47. On March 25, 2015, Respondent contacted the Colts Neck police to make accusations about his son. The son stated that Respondent is in poor health and needs a psychological screening. (Mendoza Cert. Exhibit Q Colts Neck Police report #15CN02166)

48. On March 27, 2015, the son of Respondent voluntarily surrendered to the Colts Neck Police Department firearms (nine guns) that Respondent had removed to his son's home for safekeeping in May 2014. The son reported that his father has had a lot of physical and emotional problems in the recent past and is not in "the right mind" to possess weapons. (Mendoza Cert. Exhibit R Colts Neck Police report #15CN02220).

49. Upon information and belief, Dr. Clemente was admitted to Robert Wood Johnson Hospital in late April 2015 (Nicoletti Cert. Para. 31).

50. As detailed above, Respondent's personal health indicates he is incapable for medical or any other good cause, of discharging the functions of a licensee in a manner consistent with the public's health, safety and welfare, and there is basis pursuant to N.J.S.A. 45:1-21(i) to suspend his license.

51. Respondent's conduct as detailed above palpably demonstrates a clear and imminent danger to the public, health, safety and welfare should Respondent continue practicing medicine.

WHEREFORE, Complainant respectfully seeks the entry of an order against Respondent John S. Clemente as follows:

1. Temporarily suspending Respondent's license to practice medicine and surgery in the State of New Jersey pending the disposition of a plenary hearing on this Administrative Complaint.

2. Suspending or revoking Respondent's license to practice medicine and surgery in the State of New Jersey following a plenary hearing.

3. Assessing civil penalties against Respondent for each and every separate unlawful act as set forth in the individual counts above pursuant to N.J.S.A. 45:1-25.

4. Requiring Respondent to pay costs, including investigative costs, attorney's fees and costs, expert and fact witness fees and costs, costs of hearing, and transcript costs pursuant to N.J.S.A. 54:1-25 and

5. Ordering such other and further relief as the board of Medical Examiners shall deem just and appropriate under the circumstances.

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: 

Kathy Stroh Mendoza  
Deputy Attorney General

- 13 -

Dated: Jul 29, 2015

4/29/15