

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORKCOMMISSIONERS OF THE STATE
INSURANCE FUND,INDEX NO.:
DATE FILED: 07406555
POLICY NO.: 14466643

Plaintiff,

-against-

HARRY'S NURSES REGISTRY, INC.,

Defendant(s).

FILED

OCT 03 2007

NEW YORK
COUNTY CLERK'S OFFICE

SUMMONS

Plaintiff designates New York
County as the place of trial.The basis of venue is
Plaintiff's Place of Business.

To the above named Defendant(s):

YOU ARE HEREBY SUMMONED AND REQUIRED to serve upon the Plaintiff's attorney, at the address stated below, a written Answer to the attached complaint.

If this Summons is served upon you within the State of New York by personal service, you must respond within 20 days after service, not counting the day of service. If this Summons is not personally delivered to you within the State of New York, you must respond within 30 days after service is completed, as provided by law.

If you do not respond to the attached Complaint within the applicable time limitation stated above, a Judgment will be entered against you, by default, for the relief demanded in the Complaint, without further notice to you.

Dated: New York, New York
October 2, 2007GREGORY J. ALLEN
Attorney for Plaintiff
COMMISSIONERS OF THE STATE
INSURANCE FUNDBY: Carol A. Venezia
Carol A. Venezia
199 Church Street
New York, New York 10007-1173
(212) 312-7125Business address of defendant(s):
88-25 163RD STREET
JAMAICA, NY 11432

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

COMMISSIONERS OF THE STATE INSURANCE FUND,

Plaintiff,

VERIFIED COMPLAINT

-against-

HARRY'S NURSES REGISTRY, INC.,

Index No.:

Defendant.

Policy No.: 14466643

Plaintiff, by its attorney, Gregory J. Allen, complaining of the defendant, respectfully alleges as follows:

1. Plaintiff, the Commissioners of the State Insurance Fund, is in charge, supervision and control of the affairs of the State Insurance Fund and is, by virtue of its said offices, invested with the authority to collect all claims and to prosecute any and all actions, including the present action, under and pursuant to the terms of the Workers' Compensation Law for the benefit and on behalf of the State Insurance Fund.
2. The State Insurance Fund (hereinafter, "State Fund") is an agency of the State of New York, authorized to conduct the business of insurance in the State of New York with an office at 199 Church Street, New York, New York 10007-1173.
3. State Fund provides workers' compensation and disability insurance coverage for its customers for which it charges premiums and fees.
4. Pursuant to the provisions of the Workers' Compensation Law and the acts amendatory thereof and supplemental thereto, defendant signed and filed with State Fund an application for workers' compensation insurance, as created by Article VI of said Law.
5. In compliance with this application, State Fund issued to the defendant a policy of workers' compensation/disability insurance, policy number **14466643**, for which defendant agreed to pay to State Fund premiums based upon payroll, as provided by the Workers' Compensation Law, which policy is self-renewing on an annual basis.
6. Upon information and belief, Defendant is a domestic corporation located at 88-25 163rd Street, Jamaica, NY.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

COMMISSIONERS OF THE STATE INSURANCE FUND,

Plaintiff,

VERIFIED COMPLAINT

-against-

HARRY'S NURSES REGISTRY, INC.,

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6. Upon information and belief, Defendant is a domestic corporation located at 88-25 163rd Street, Jamaica, NY.

7. This action arises out of defendant's transaction of business or doing business in the State of New York.

8. State Fund has fully performed by providing the insurance coverage sought up to the date the policy was cancelled, to wit, June 19, 2007.

9. Defendant has defaulted in the payment of premiums due in accordance with the terms of said policy and/or controlling law, such that the sum of \$122,729.01, which has been duly demanded, is now due and owing for unpaid or underpaid premium.

10. Plaintiff may and does herein seek to recover the cost of collection pursuant to the State Finance Law section 18, which is 22% of the principal amount sought in item 9, to wit, \$27,000.38.

WHEREFORE, it is respectfully requested that plaintiff, The Commissioners of the State Insurance Fund, be awarded judgment against defendant:

- (a) Unpaid premium of \$122,729.01;
- (b) Interest from June 19, 2007;
- (c) Cost of collection pursuant to State Finance Law section 18, which is 22% of the principal amount to be due, or \$27,000.38;
- (d) Costs and disbursements of this action.

Dated: New York, New York
October 2, 2007

GREGORY J. ALLEN
Attorney for Plaintiff
COMMISSIONERS OF THE STATE
INSURANCE FUND

BY: Carol A. Venezia
Carol A. Venezia, Esq.
199 Church Street
New York, New York 10007-1173
(212) 312-7125

ATTORNEY'S VERIFICATION BY AFFIRMATION

Carol A. Venezia, the undersigned duly affirms under penalty of perjury that I am an attorney duly admitted to the practice of law in the State and that I am associated with Gregory J. Allen, General Attorney of the State Insurance Fund, attorney for plaintiff, and I further affirm that I have read the foregoing complaint, know the contents thereof, and that the same is true and correct of my own knowledge except as to the matters herein stated to be alleged upon information and belief, and, as to those matters, I believe to be true, that the sources of information and the grounds of belief as to the matters therein stated to be alleged upon the records of the State Insurance Fund, and other information consisting of communications and statements made by the representatives of the State Insurance Fund.

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: New York, New York
October 2, 2007

GREGORY J. ALLEN
Attorney for Plaintiff
COMMISSIONERS OF THE STATE
INSURANCE FUND

BY: Carol A. Venezia
Carol A. Venezia
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SUPREME COURT OF THE STATE OF NEW YORK
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COMMISSIONERS OF THE STATE INSURANCE FUND,

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Defendant(s).

SUMMONS AND VERIFIED COMPLAINT

GREGORY J. ALLEN

Attorney for Plaintiff

By: Carol A. Venezia, Esq.

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