

6. Additionally, Respondent sent this letter to 194 individuals who had received the services in question over six years prior to the date of the letter's issuance.

7. The Attorney General alleges that the above conduct constitutes unfair and deceptive acts and practices under 9 V.S.A. § 2453.

INJUNCTIVE RELIEF

- I. Prohibition Against Violations of the Vermont Consumer Protection Act
 - a. Respondent shall cease and desist from any acts or practices that violate the CPA.
- II. Required use of a collections agency
 - a. From the date of execution of this AOD, Respondent shall utilize a professional collections agency for the administration of patient debt collection.
- III. Prohibition on certain collections
 - a. Respondent shall not attempt to collect or actually collect any debt from the Vermont patients relating to services Respondent provided said patients over six-years prior to August 15, 2021.
 - b. Respondent shall not attempt to collect debt or actually collect debt from the Vermont patients with Medicaid coverage for the underlying services.

CIVIL PENALTY

Respondent shall pay \$10,000 to the State of Vermont by March 1, 2022. \$5,000 of this payment is suspended in light of Respondent's cooperation with the Attorney General's investigation in this matter; actions to remediate the Collections Letter; and discounting of patient debt in relation to the Collections Letter.

OTHER TERMS

8. Respondent agrees that this AOD shall be binding on it, and its successors and assigns.

9. The Attorney General hereby releases and discharges any and all claims arising under the Vermont Consumer Protection Act, 9 V.S.A. Chapter 63, that it may have against Respondent up to the AOD's effective date in relation to the subject matter of this investigation and AOD.

10. The Superior Court of the State of Vermont, Washington Unit, shall have jurisdiction over this AOD and the parties hereto for the purpose of enabling the Attorney General to apply to this Court at any time for orders and directions as may be necessary or appropriate to enforce compliance with or to punish violations of this AOD.

11. Acceptance of this AOD by the Attorney General's Office shall not be deemed approval by the Attorney General of any practices or procedures of Respondent not required by this AOD, and Respondent shall make no representation to the contrary.

STIPULATED PENALTIES

12. If the Superior Court of the State of Vermont, Washington Unit enters an order, following submissions by the parties, finding that Respondent has materially violated this AOD, then the parties agree that penalty to be assessed by the Court shall be \$5,000 (i.e., the amount of the penalty suspended).

NOTICE

13. Respondent may be contacted through [agent]: Van Jackson

[Agent name & address & phone & email] Van T. Jackson
3505 Richville Road Manchester
Center VT

14. Respondent shall notify the Attorney General of any change to the method of contact described above.


802.360.144
ext
201
Jackson@tccnrcrthd.ca

SIGNATURE

In lieu of instituting an action or proceeding against Respondent, the Office of the Vermont Attorney General, pursuant to 9 V.S.A. § 2459, accepts this Assurance of Discontinuance. By signing below, Respondent voluntarily agrees with and submits to the terms of this Assurance of Discontinuance.

385 Mendonville road
Manchester VT 05430

DATED at March 7th 2022, this 7th day of March, 2022.


[NAME]
Authorized agent of Taconic Spine


ACCEPTED on behalf of the Attorney General:

DATED at Montpelier, Vermont this 10 day of March, 2022.

STATE OF VERMONT

THOMAS J. DONOVAN, JR.
ATTORNEY GENERAL

By:


Jamie Renner
Assistant Attorney General
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