

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

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<b>In the Matter of</b>	)	
	)	
<b>INDEPENDENT PHYSICIAN ASSOCIATES</b>	)	<b>File No. 061 0258</b>
<b>MEDICAL GROUP, INC., dba ALLCARE IPA,</b>	)	
<b>a California corporation.</b>	)	

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**AGREEMENT CONTAINING CONSENT ORDER TO CEASE AND DESIST**

The Federal Trade Commission (“Commission”), having initiated an investigation of certain acts and practices of Independent Physician Associates Medical Group, Inc., dba All Care IPA (“AllCare”), hereinafter sometimes referred to as “Proposed Respondent,” and it now appearing that Proposed Respondent is willing to enter into an Agreement Containing Consent Order to Cease and Desist (“Consent Agreement”) from certain acts and practices, and providing for other relief,

**IT IS HEREBY AGREED** by and between Proposed Respondent and its attorneys, and counsel for the Commission that:

1. Proposed Respondent AllCare is a for-profit corporation, organized, existing, and doing business under and by virtue of the laws of the State of California, with its principal place of business located at 3340 Tully Rd., Suite B-4, Modesto, CA 95350.
2. Proposed Respondent admits all the jurisdictional facts set forth in the draft Complaint here attached.
3. Proposed Respondent waives:
  - a. any further procedural steps;
  - b. the requirement that the Commission’s Decision and Order, attached hereto and made a part hereof, contain a statement of findings of fact and conclusions of law;
  - c. all rights to seek judicial review or otherwise to challenge or contest the validity of the Decision and Order entered pursuant to this Consent Agreement; and

unless and until it is accepted by the Commission. If this Consent Agreement is accepted by the Commission it, together with the draft Complaint contemplated thereby, will be placed on the public record for a period of thirty (30) days and information with respect thereto publicly released. The Commission thereafter may either withdraw its acceptance of this Consent Agreement and so notify the Proposed Respondent, in which event it will take such action as it may consider appropriate, or issue and serve its Complaint (in such form as the circumstances may require) and Decision and Order, in disposition of the proceeding.

5. This Consent Agreement is for settlement purposes only and does not constitute an admission by Proposed Respondent that the law has been violated as alleged in the draft Complaint here attached, or that the facts as alleged in the draft Complaint, other than jurisdictional facts, are true.
6. This Consent Agreement contemplates that, if it is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to the provisions of Commission Rule 2.34, 16 C.F.R. § 2.34, the Commission may, without further notice to Proposed Respondent, (1) issue and serve its Complaint corresponding

**INDEPENDENT PHYSICIAN ASSOCIATES  
MEDICAL GROUP, INC.,**  
a corporation.

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

Signed this \_\_\_\_ day of \_\_\_\_\_, 2007

\_\_\_\_\_

Counsel for Independent Physician Associates  
Medical Group, Inc.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2007

**FEDERAL TRADE COMMISSION**

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

John Wiegand  
Kerry O'Brien

**APPROVED:**

\_\_\_\_\_  
Jeffrey A. Klurfeld  
Director  
Western Region  
Federal Trade Commission

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Associate Director for the Regions  
Federal Trade Commission

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Director  
Bureau of Competition  
Federal Trade Commission