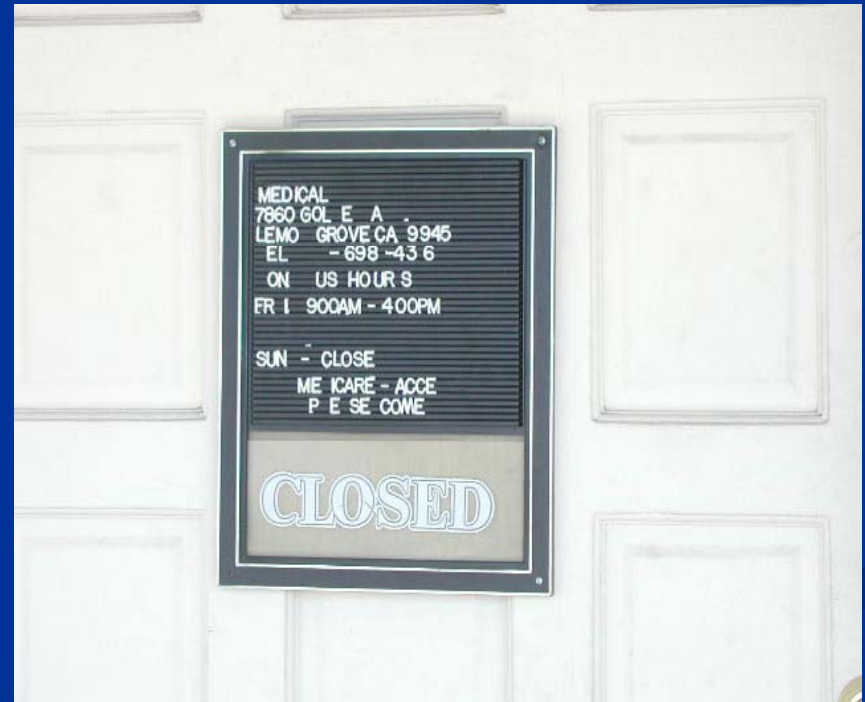


**Deputy District Attorney Brent Neck
and Alan Kessler
San Diego County DA Office
(619) 685-6681**



Medical Clinic
7860 Golden Avenue
Lemon Grove Calif.
April 2004 to July 2005



7860 Golden Avenue



**Investigation revealed Medicare was
being billed for certain medical
procedures that in certain instances
were never done**

- Allergy Test
- VNG Dizziness Testing
- Incontinence Testing
- Nerve Conduction Testing
- Pulmonary Function Test
- Take Home Heart Monitor



MEDICARE
PART B CONTRACTOR

Provider Comparative Billing Report

Based on services rendered between 9/1/04 and 2/28/05
and Paid through 3/31/05

Provider ID: G64836C Practicing Specialty: 01 (General Practice)

Top 10 procedure codes for Your Specialty Nationwide

Procedure Code	Description
99213	Office/op Visit For Evaluation/management Of Est Patient/problem I
99214	Office/op Visit For Evaluation/management Of Est Patient/problem I
J2792	Injection, Rho D Immune Globulin, Intravenous, Human, Solvent Dete
99232	Subsequent Hosp.care/per Day/evaluation & Management/minor Complic
99285	Emergency Dept Visit For Evaluation & Management Of A Patient,whic
J2790	Rho D Immune Globulin, Human, One Dose Package
99212	Office/op Visit For Evaluation/management Of Est Patient/problem I
J1563	Injection, Immune Globulin, Intravenous, Ig
99284	Emergency Dept Visit/evaluation & Management/problem Is Of High Se
99312	Subsequent Nursing Facility Care/per Day/evaluation & Management O

Your Top 10 Procedure Codes

Procedure code	Description
91122	Anorectal Manometry
51784	Electromyography Studies (emg) Of Anal Or Urethral Sphincter, Othe
95004	Percutaneous Tests (scratch, Puncture, Prick) With Allergenic Extr
93925	Duplex Scan Of Lower Extremity Arteries Or Arterial Bypass Grafts;
95903	Nerve Conduction, Amplitude And Latency/velocity Study, Each Nerve
93307	Echocardiography, Transthoracic, Real-time, With Image Documentati
93970	Duplex Scan Of Extremity Veins Including Responses To Compression
93880	Duplex Scan Of Extracranial Arteries; Complete Bilateral Study
93978	Duplex Scan Of Aorta,inferior Vena Cava,iliac Vasculature Or Bypas
95904	Nerve Conduction Amplitude And Latency/velocity Study, Each Nerve,

NHIC

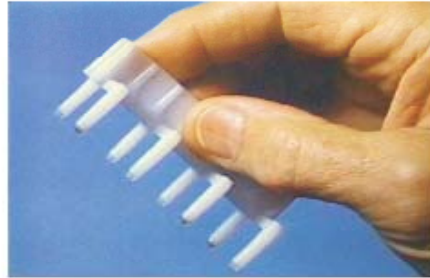
National Heritage Insurance Company
1055 W. 7th Street
Los Angeles, CA 90017
A CMS CONTRACTOR

006546

TMP-MDR-0063
Version 4.0

ALLERGY TESTING

Multiple skin pricks with
device
95004



PFTs

Breathing Tests

All tests involve breathing into a tube while wearing nose clips

Lung measurements after cold
air/inhalers
94070



Lung Volume/Helium or Nitrogen
Method
94240



Breathe room air + 100% O₂
94350

Single breath/airway closing
volume
94370



Measure inhaled carbon
monoxide
94725

Swallow a balloon/sit in
booth
94750



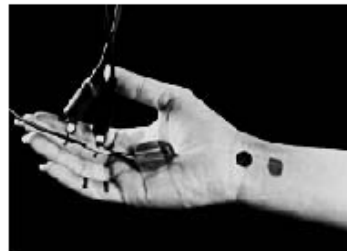
NCS

Nerve Conduction Studies

Electrodes on arm/leg
electric shocks
(motor nerves)
95903



Electrodes on arm/legs
electric shocks
(sensory nerves)
95904



Electrodes on chest/like
EKG
95921 (R to R)



Electrodes on head, neck,
back. Shocks to arm
95925

Electrodes on head, neck,
back. Shocks to leg
95926



Electrodes on leg/shocks
to leg (H reflex)
95934

VNG

Dizziness/Balance Testing

Goggles
92541



Goggles
92542



Goggles/Air or Water in ears
92543



Goggles
92544



Goggles
92545

Goggles/Rotational Chair
92546

Moving Platform
Safety Harness
92548



Arthur Vallejo (G64836C) Lemon Grove Clinic

<i>Time Period</i>	<i>Procedure Group</i>	<i>Total Number of Patients</i>	<i>Billed Amount</i>	<i>Paid Amount</i>
<i>April 2004 through July 2005</i>				
	Ultrasound	581	\$681,000.00	\$350,722.55
	Incontinence Testing and Treatmen	78	\$269,370.00	\$127,579.88
	VNG - Dizziness/Balance Testing	211	\$208,193.00	\$85,966.73
	Office Visits	606	\$175,010.00	\$81,083.62
	PFT - Breathing Test	199	\$179,460.00	\$67,798.08
	Continuous Heart Monitor	265	\$119,360.00	\$63,201.60
	NCS - Nerve Conduction Studies	207	\$181,670.00	\$61,709.22
	Allergy Testing	92	\$133,216.00	\$46,128.89
	EKG/ECG/R to R	600	\$75,000.00	\$28,393.74
		<i>Grand Total</i>	<i>\$2,022,279.00</i>	<i>\$912,584.31</i>

The Charges

- Count One: Conspiracy to Commit Grand Theft
- Count Two: Grand Theft
- Count Three: Conspiracy to Commit Crime of Making a False Insurance Claim
- Count Four: Making a False Insurance Claim

Count One and Three: Conspiracy

- Agreement (expressed or implied)
- Overt act by at least one of the co-conspirators
- Specific Intent to Commit Target Offense

Count Two – Grand Theft (by Larceny)

- Defendant took possession of property (Medicare money) owned by someone else
- Without the consent of the owner (Medicare)
- Intent to Permanently Deprive
- Defendant moved the property
- Greater than \$400

Count Four: Making a False Insurance Claim

- Defendant made or caused to be made a false or fraudulent representation
- Defendant knew that the claim was false or fraudulent, and
- Intent to Defraud

Witnesses

- Medical Doctors and other Medical Personnel
- Patients
- Law Enforcement
- Miscellaneous Witnesses

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