

hopeful that this email response is helpful to you, and to the other recipients that you included on the email. We are available to discuss this in detail or to respond to any authorities or other information you would like to provide.

Thanks again for the communication.

Paul

Paul S. Meyer Law Offices
695 Town Center Drive #875
Costa Mesa, California 92626
T: 714 754 6500
F: 714 979 9047
E: pmeyer@meyerlawoc.com
W: meyerlawoc.com

From: Kamiabipour, Shaddi [<mailto:Shaddi.Kamiabipour@da.ocgov.com>]
Sent: Monday, December 07, 2015 1:55 PM
To: Paul Meyer; Kay Rackaukas; Benjamin N. Gluck (bgluck@birdmarella.com); David Swanson
Cc: Robert Mosier; Friedl, Jennifer; Pettibone, Jay; Jackson, Debbie
Subject: FW: A/R Billed and Total Outstanding
Importance: High

Good morning Paul, Kay, Benjamin and Dave,

As you may know, I have been in litigation and have been prosecuting a radiologist for Billing Fraud. In the process, I've learned a great deal about the industry and how things are to be done by a radiologist.

I recalled that your clients had an MRI service. I couldn't figure out how a civilian owned an MRI business so I decided to look into it.

In a nutshell, ***running an Imaging center or any kind of radiology service is engaging in the practice of medicine which means that it must be run by a medical director who is a radiologist.***

It appears that Regional is supposed to be a "scheduling" company only and is not supposed to be engaged in the practice of medicine because it is not a professional corporation within the meaning of the Moscone-Knox Professional Corporation Act. I've attached a copy of their corporate documents which were previously discovered to you for your reference.

I asked the receiver for a copy of the CMS1500 forms for billing for the MRIs and I see that Regional appears to be conducting MRIs. These bills raise the following questions:

1. Who is the medical director (radiologist) in charge of Regional?
2. Is this person a full-time or part-time physician?
3. Is he a contractor or W-2 employee?
4. Are the technicians who are operating the MRI machines Licensed?
5. Who is the technicians' supervisor?
6. Who is the person who implemented the protocols for conducting MRIs on patients?
7. Why don't the CMS 1500 forms have the name of the physician who oversees this operation in Box 31? (whose signature is on file?)
8. Why are there three different radiologist who wrote reports reading the MRIs? How are these radiologists paid?
9. Who owns Open System Imaging in Santa Ana and why is Regional doing that entity's billing?
10. How does Lornette Morton fit into all of this as the biller?

Please discuss these facts with ^{your} client and be prepared to provide us with the answers by Friday.

If you have any additional questions or concerns please feel free to call me.

Thank you.

*Shaddi Kamiabipour, Senior DDA
Orange County District Attorney's Office
Insurance Fraud Unit
(714) 664-3948*

From: Robert Mosier [<mailto:rmosier@mosierco.com>]
Sent: Friday, December 04, 2015 1:46 PM
To: Kamiabipour, Shaddi; Jackson, Debbie
Subject: FW: A/R Billed and Total Outstanding

Is this what you are seeking? RPM

Robert P. Mosier
Mosier & Company, Inc.
3151 Airway Avenue, Suite A-1
Costa Mesa, CA 92626
Phone 714-432-0800 x222
Cell 714-267-3588
Email: RMosier@MosierCo.com
Web: www.MosierCo.com