

DESIRE BELL SUPPORTING AFFIDAVIT

STATE OF TEXAS

COUNTY OF DENTON

Before me, the undersigned authority, this day personally appeared Desire Bell and stated under oath as follows:

I, Desire Bell, am above the age of eighteen years, and I am fully competent to make this Affidavit. The fact and circumstances alleged are true to the best of my knowledge and belief.

1. I was employed by Texas Vascular Associates (TVA) in Dallas, TX from November 2010 until July 2011.
2. My job title was Account Resolution Specialist. My duties consisted of reviewing the medical billing submitted by the physicians of TVA for billing and collection.
3. I would review the medical billing to see if the proper medical coding was listed and that the physician's notes matched the medical procedure performed before sending the medical bill to either Medicare or private insurance for payment.
4. I primarily worked with Drs. Bertram Smith and Toby Dunn.
5. The diagnostic medical codes were entered by the doctors on the billing.
6. Many times the billing would come to me with diagnostic coding but there would be no supporting notes from the physician on what medical procedure was actually performed.
7. When I would call this to the attention of Drs. Smith or Dunn that I needed their notes to properly process the medical billing, they would get upset and tell me to go ahead and process the bill without supporting documents. Dr. Dunn would sometimes curse at me and tell me, "just send the bill in."

8. The physicians did not want to delay payment and pressured me to forward the bill for payment even though there were no supporting documents.
9. I knew from talking to other account resolution specialists in the offices of TVA that they were also pressured by the physicians to process medical billing without proper documentation.
10. I was asked to change medical coding on Medicare billing if the codes didn't fall in Medicare guidelines for payment. The physicians would then alter their notes so that it appeared that the medical procedure fell within Medicare guidelines.
11. Dr. Dunn was notorious for not having supporting documents for the medical billing. Both Drs. Dunn and Smith would put pressure on me to forward the medical bills to Medicare or private insurance carriers for payment when I knew that the bills either had no supporting documents or were false.
12. I also knew that the physicians were billing for services inside the "Global Period." I knew that the physicians were not supposed to bill for services inside of the Global Period. The physicians had the attitude that Medicare wouldn't catch this extra billing and would go ahead and pay the bill.
13. I knew that physicians were demanding to put in "Modifiers" so that they could collect higher fees from Medicare when there were no supporting notes indicating that a complicated medical procedure was actually performed.
14. I became concerned that I was being forced to assist physicians of TVA in committing fraud and I did not want to be involved in what I perceived as being an ethical violation as well as a possible criminal violation.
15. I was so concerned with the actions of TVA that I reported their billing practices to Medicare and told Medicare that they should investigate. I do not know if Medicare took any action.

FURTHER AFFIANT SAYETH NAUGHT

THE STATE OF TEXAS

COUNTY OF DENTON

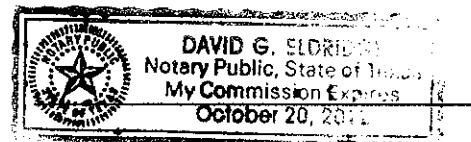
This document was acknowledged before me on the 18 day of July, 2012 by

Desire Bell

Desire Bell

David Eldridge

Notary Public in and for the State of Texas



Notary's Printed Name

David Eldridge

My Commission Expires

10-20-2012