ENS Medical, P.C.

205 W 54th Street #11A
New York, NY 10019

Neurological Initial Consultation

Date: 4/21/21 D.O.A 1/13/21

Patient Name: [redacted] Age: 64

- Details of the accident obtained from ✓ patient's own description, ___ from patient's mother/father, ___from patient's guardian. Translation obtained from _____language.
- This is a 64 year old man/woman who states on 1/13/21, as a pedestrian/driver/bicyclist front/rear seat passenger of a car, he/ she was involved in a motor vehicle accident. According to the information presented by the patient he/she was in a regular state of good health and was capable of living on an equal basis with others of his/her age before he/she was involved in a vehicle accident when all of his/her symptoms began. He/ She are currently receiving treatment for the injuries sustained.
- There was: Yes/No reported loss of consciousness.
- After the accident: Yes/No ambulance arrived.
- The patient: Went Home To Recuperate/ Went To ER/Was taking by EMS to _____ Hospital.
- At the hospital: X-Ray(s)/ MRI, Ct-Scan were/ were not taken.
- Result was Positive/ Negative for a _____ fracture.
- Patient was: Examined/ Given Pain Medication_____/ Treated and Released/ Admitted for Further Treatment.
- Due to persistent pain and symptoms he/she decided to seek further medical attention.

CHIEF COMPLAINTS:

- Constant / ~~Intermittent~~ / Headaches / Right / Left Generalized.
- Nervousness / Anxiety / Tension / Dizziness.
- Fainting Spells
- Memory Problem / Problem with concentration Yes / No
- Sleep disturbances: difficulty falling asleep/staying asleep
- Right / Left / Anterior / Lateral chest wall pain
- Constant / Intermittent ~~Posterior~~ **Neck Pain** worse on the right/left side.
- Stiffness ~~Radiating to~~ the Right / Left Shoulder
- Stiffness Radiating to the Right / Left Arm / Fore Arm / Hand
- **Neck Pain** exacerbated by movement/changing position of the head, neck and body. Patient rates his/her Neck Pain as 8 on a pain scale 1-10.

482. For many of the Travelers' claimants, the Ahmed PCs' fabricated findings of neck and back pain often times is radiating to extremities resulting in weakness, pain, spasms, tenderness, numbness, and/or tingling.

483. These vague findings were used as support to justify scores of fraudulent diagnostic testing.

484. Tellingly, the information discussed in the neurological consultation reports are never reported back to the referring healthcare providers to use in treating Travelers' claimants, which is a hallmark of unnecessary and predetermined treatment protocol.

485. As a result of this unlawful conduct, all of the services billed to Travelers by the Ahmed PCs are fraudulent.

b. Fraudulent Electrodiagnostic Testing

486. An integral part of the Defendants' scheme involved billing for fraudulent EDX testing.

487. The term EDX testing refers to electromyography tests ("EMGs") and nerve conduction velocity testing ("NCVs") (which include "F-Wave" and "H reflex" studies).

488. Generally, EDX testing is utilized as part of the clinical evaluation of patients with disorders of the peripheral and/or central nervous system. EDX tests are often utilized to help a practitioner evaluate symptoms, arrive at a proper diagnosis, and monitor patient response to treatments.

489. EDX testing, such as NCVs, and EMGs, should not be administered uniformly across patient populations; rather, the decision of which nerves, nerve roots, and/or muscles to test should be individually tailored to address the specific circumstances of each patient.

490. EDX tests, such as NCVs and EMGs, are dynamic procedures, meaning that the process in which these tests are administered should change during the tests as new information is obtained.

491. As explained below, however, Ahmed never tailored the EDX tests to the unique circumstances of any Travelers' claimant.

492. Overall, patients treated by the PC Defendants were subjected to NCVs and EMGs that were identical, and the provision of testing in this manner was wholly unnecessary to evaluate and assess the condition of each Travelers' claimant.

493. Not only was such testing unnecessary, but it also (a) inflated the charges submitted to Travelers, and (b) placed the patients at additional—and unwarranted—physical risk of injury.

i. *Fraudulent NCV Protocol*

494. The Defendants' scheme to defraud included billing for unnecessary and fraudulent NCV to extract insurance payments from Travelers.

495. An integral facet of the Defendants' scheme involved the submission of false NCV bills and records to Travelers through the U.S. Mail demanding payment.

496. Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical submitted false medical documentation to Travelers for bogus NCV testing.

497. NCVs are non-invasive studies in which peripheral nerves are stimulated with electrical currents.

498. The velocity, amplitude, and shape of the response are then recorded by electrodes attached to the skin, and are compared with well-defined normal parameters and

responses to identify the existence, nature, extent, and specific location of any abnormal sensory or motor nerve fibers. In short, NCVs confirm that the peripheral nerves are functioning normally.

499. The selection and number of nerves studied during an NCV should vary from patient-to-patient.

500. In other words, in a legitimate clinical setting, every patient's abnormal NCV should involve the testing of some different specific nerves.

501. The NCVs administered by Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical to Travelers' claimants involved no such variation.

502. According to the American Medical Association ("AMA"), the utilization of dynamic decision-making is a prerequisite for the use of electrodiagnostic Current Procedural Terminology ("CPT") codes.

503. Moreover, the proper administration of EDX tests requires, among other things, dynamic decision making by the provider regarding the design and scope of the tests. Specifically, the AMA states:

> [T]here is no single, universally accepted, specific protocol or set of procedures employed for each diagnostic category. Instead, the EDX provider must continually reassess the findings encountered during the performance of the EDX testing . . .

CPT Assistant, Vol. 12, Issue 4, April 2002.

504. Contrary to these requirements, however, the NCVs administered by Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical to Travelers' claimants were never tailored to the

unique circumstances of any patient, nor were they tailored or modified based on findings obtained from previously-tested nerves.

505. Instead, virtually every patient treated by Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical received an NCV test on the same nerves and nerve fibers.

506. Crucially, Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical utilized a standardized protocol when administering NCVs to Travelers' claimants.

507. Even if every patient treated by Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical actually required an NCV test (which they did not), it is virtually impossible that every patient would require the same number of tests on the same specific nerves given the unique physical characteristics and conditions of each individual patient, particularly if these patients had nerve damage as alleged.

508. Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medicals' utilization of a standardized, protocol approach to NCVs administered to Travelers' claimants serves no meaningful medical purpose, and their testing protocols were specifically designed and implemented solely to maximize profit, rather than to aid in the evaluation and treatment of patients.

509. Accordingly, Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medicals' protocol approach to NCV testing—combined with (a) the gross overuse of these tests, and (b) the failure

to properly interpret the tests—demonstrates and exemplifies why all of the charges submitted to Travelers in connection with NCVs administered by Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical to Travelers' claimants are fraudulent and non-compensable under New York's insurance law.

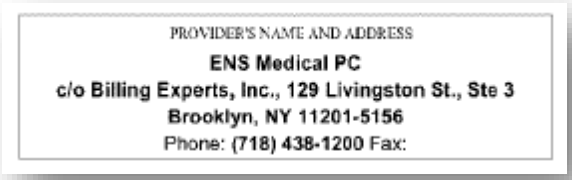
510. The claims listed in Exhibit 3 demonstrate a clear pattern of abuse through a specific protocol for the use of NCVs.

511. The American Association of Neuromuscular & Electrodiagnostic Medicine ("AANEM") has published a position statement that contains recommended policy for electrodiagnostic medicine.

512. The AANEM recommends in the vast majority of patients that it is appropriate to test 2 sensory and 3 motor nerves for effective NCV testing.

513. To maximize their profits, Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical disregarded this recommendation and habitually billed for NCV testing to at least 8 sensory nerves and 4 motor nerves as well as multiple F-wave and H-reflex tests.

514. A true and accurate representative example of ENS Medical billing for NCV testing to 8 sensory nerves and 4 motor nerves is depicted below:


PROVIDER'S NAME AND ADDRESS
ENS Medical PC
c/o Billing Experts, Inc., 129 Livingston St., Ste 3
Brooklyn, NY 11201-5156
Phone: (718) 438-1200 Fax:

15. REPORT OF SERVICES RENDERED-- ATTACH ADDITIONAL SHEETS IF NECESSARY

DATE OF SERVICE	PLACE OF SERVICE INCLUDING ZIP CODE	DESCRIPTION OF TREATMENT OR HEALTH SERVICE RENDERED.	Md fr	FEE SCHEDULE TREATMENT CODE	CHARGES SUMMARY
09/08/2021	89-25 130th Street Richmond Hill, NY 11418	NERVE CONDUCTION STUDIES, 13 OR MORE STUDIES		95913	$663.48
09/08/2021	89-25 130th Street Richmond Hill, NY 11418	EMG 2 EXTREMITIES UPPER		95886	$404.50
09/08/2021	89-25 130th Street Richmond Hill, NY 11418	FOLLOW UP VISIT LEVEL IV		99214	$127.41
				TOTAL CHARGES TO DATES:	**$1185.37**

Nerve Conduction Studies

Motor Summary Table

Site	NR	Onset (ms)	Norm Onset (ms)	O-P Amp (mV)	Norm O-P Amp	Site1	Site2	Delta-0 (ms)	Dist (cm)	Vel (m/s)	Norm Vel (m/s)
Left Median Motor (Abd Poll Brev)											
Wrist		**5.0**	<4.2	**4.2**	>5.0	Elbow	Wrist		32.0		>50.0
Elbow	**NR**				>5.0						
Right Median Motor (Abd Poll Brev)											
Wrist		**5.5**	<4.2	6.1	>5.0	Elbow	Wrist		32.0		>50.0
Elbow	**NR**				>5.0						
Left Ulnar Motor (Abd Dig Minimi)											
Wrist		3.3	<4.2	4.2	>3.0	Elbow	Wrist	4.8	30.0	63	>53.0
Elbow		8.1		6.9	>3.0						
Right Ulnar Motor (Abd Dig Minimi)											
Wrist		3.0	<4.2	3.6	>3.0	Elbow	Wrist	5.0	30.0	60	>53.0
Elbow		8.0		3.6	>3.0						

Sensory Summary Table

Site	NR	Peak (ms)	Norm Peak (ms)	P-T Amp (μV)	Norm P-T Amp	Site1	Site2	Delta-0 (ms)	Dist (cm)	Vel (m/s)	Norm Vel (m/s)
Left DorsCutan Sensory (Dorsum 5th MC)											
Wrist		2.3	<2.7	20.0	>10.0	Wrist	Dorsum 5th MC	2.0	12.0	60	>45.0
Right DorsCutan Sensory (Dorsum 5th MC)											
Wrist		2.6	<2.7	29.9	>10.0	Wrist	Dorsum 5th MC	2.3	12.0	52	>45.0
Left Median D2 Sensory (2nd Digit)											
Wrist	**NR**		<3.6		>10.0	Wrist	2nd Digit		14.0		>39.0
Palm	**NR**				>10.0	Palm	2nd Digit		7.0		
						Wrist	Palm		7.0		
Right Median D2 Sensory (2nd Digit)											
Wrist	**NR**		<3.6		>10.0	Wrist	2nd Digit		14.0		>39.0
Palm	**NR**				>10.0	Palm	2nd Digit		7.0		
						Wrist	Palm		7.0		
Left Radial Sensory (Base 1st Digit)											
Wrist		2.1	<2.7	18.9	>10.0	Wrist	Base 1st Digit	1.7	10.0	59	>45.0
Right Radial Sensory (Base 1st Digit)											
Wrist		2.3	<2.7	23.9	>10.0	Wrist	Base 1st Digit	1.8	10.0	56	>45.0
Left Ulnar Sensory (5th Digit)											
Wrist		3.6	<3.7	**12.7**	>15.0	Wrist	5th Digit	2.5	14.0	56	>45.0
Right Ulnar Sensory (5th Digit)											
Wrist		**3.8**	<3.7	23.7	>15.0	Wrist	5th Digit	3.1	14.0	45	>45.0

515. Tellingly, the results of Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical's NCV testing was never incorporated into the Travelers' claimants treatment plans.

516. In addition to this fraudulent treatment, ENS Medical, Modern Brooklyn, Northern Medical, Pitch Medical, and Queens Medical billed for deleted nerve conduction CPT codes for a significant period after the codes had been deleted.

517. CPT code 95903 was for nerve conduction, amplitude and latency/velocity studies on each motor nerve with an F-wave study.

518. CPT code 95904 was for nerve conduction, amplitude and latency/velocity studies on each sensory nerve with an F-wave study.

519. CPT code 95905 was for motor and/or sensory nerve conduction using a preconfigured electrode array, amplitude, and latency/velocity study on each limb, including F-wave studies when performed and with interpretation and report.

520. CPT code 95934 was for H-reflex, amplitude, and latency studies of the gastrocnemius/soleus muscle.

521. CPT codes 95903, 95904, 95905 and 95934 were deleted from the CPT code set by the AMA for dates of service effective January 1, 2013 and replaced with CPT codes 95907-95913.

522. Despite CPT codes 95903, 95904, 95905, and 95934 not being active reimbursable CPT codes since January 1, 2013, ENS Medical, Modern Brooklyn, Northern Medical, Pitch Medical, and Queens Medical billed Travelers over $179,000.00 for just these codes alone between 2018-2023.

523. A true and accurate representative example of ENS Medical billing for these defunct CPT codes is depicted below:

PROVIDER'S NAME AND ADDRESS*
ENS MEDICAL, P.C
C/o Sanders Barshay Grossman, LLC, 100 Garden City Pl. Suite 500. Garden City. NEW YORK. 11530

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
11/04/2019	3014A Boston Rd,Bronx,NY 10475	EMG lower extremity	1	95861	$ 241.50
11/04/2019	3014A Boston Rd,Bronx,NY 10475	EMG Upper extremity	1	95861	$ 241.50
11/04/2019	3014A Boston Rd,Bronx,NY 10475	Nerve conduction study Motor with F wave	8	95903	$ 1331.76
11/04/2019	3014A Boston Rd,Bronx,NY 10475	Nerve conduction study - Sensory	10	95904	$ 1064.70
11/04/2019	3014A Boston Rd,Bronx,NY 10475	H reflex study gastrocnemius/soleus muscle	2	95934	$ 399.98
11/04/2019	3014A Boston Rd,Bronx,NY 10475	Neurological Initial Consultation	1	99244-25	$ 236.94

TOTAL CHARGES TO DATE $ 3516.38

DATE	PROVIDER'S SIGNATURE
11/19/2019	OMAR AHMED

524. The bill above charges $2,796.44 for the defunct CPT codes 95903, 95904, and 95934.

525. At the time this was billed, the most that these charges could be billed for would be $653.46 under CPT code 95913.

526. ENS Medical, Modern Brooklyn, Northern Medical, Pitch Medical, and Queens Medical fraudulently billed for defunct CPT codes 95903, 95904, 95905, and 95934 to artificially increase billing submitted to Travelers through the U.S. Mail.

527. All of the bills for NCV testing submitted by Pegasus Medical, Esplanade Medical, Queens Medical, Northern Medical, Modern Brooklyn, ENS Medical, Pitch Medical, and Terrace Medical are fraudulent, including those identified in Exhibit 3.

528. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

ii. *Fraudulent EMG Protocol*

529. The Defendants' scheme to defraud included billing for unnecessary and fraudulent needle EMG testing ("EMG") to extract insurance payments from Travelers.

530. An integral facet of the Defendants' scheme involved the submission of false EMG bills and records to Travelers through the U.S. Mail demanding payment.

531. ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical submitted false medical documentation to Travelers for bogus EMG testing.

532. EMGs involve the insertion of a needle into various muscles in the spinal area ("paraspinal muscles"), and in the arms and/or legs to measure electrical activity in each muscle.

533. There are many different muscles in the arms and legs that can be tested with EMGs.

534. In a legitimate clinical setting, the decision concerning the extent of a particular patient's EMG test is determined based on a history and detailed neurological and physical examination of the individual patient, along with an analysis of the real time results obtained during the EMG and the NCV.

535. Like NCVs, the number of limbs and the specific muscles tested during EMGs should vary from patient to patient, and the decision concerning the number of limbs and muscles to study in each test must be tailored to each patient's unique circumstances.

536. EMGs measure the electrical activity of muscles and are often done in connection with NCVs.

537. What constitutes a reasonable and appropriate EMG for one patient is not the same as for the next patient.

538. In other words, EMGs should never be administered pursuant to a predetermined protocol that dictates the number of muscles to be tested.

539. Likewise, in a legitimate clinical setting, EMGs administered to different patients should vary in terms of the specific muscles involved in each test, especially in the cases of patients whose EMGs result in abnormal findings.

540. Contrary to these norms, however, ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical never tailored the performance of these EMG tests to the unique circumstances and findings of any patient.

541. Instead, the EMGs administered to each patient treated by ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical involved all 4 limbs.

542. A true and accurate representative example from ENS Medical of EMG administered to all 4 limbs is depicted below:

Muscle Strength: (graded on a scale of 0 to 5, where *5 is normal muscle strength*)

Motor Exam of Upper Extremities	Right	Left
Shoulder Abduction Deltoid (C5 - axillary nerve)	/5	/5
Elbow Flexion Biceps (C5, C6 - musculocutaneous nerve)	/5	/5
Elbow Extention Triceps (C6, C7, C8 - radial nerve)	/5	/5
Wrist Extention (C6, C7, C8 - radial nerve)	/5	/5
Wrist Flexion (C6, C7 - median and ulnar nerves)	/5	/5
Hand Grip/Finger Flexion (C7, C8, T1 - median and ulnar nerves)	/5	/5

Motor Exam of Lower Extremities	Right	Left
Hip Flexion Iliopsoas (L2, L3, L4 -femoral nerve)	/5	/5
Hip Extention (L4, L5, S1 - gluteal nerve)	/5	/5
Knee Extension quadriceps (L2, L3, L4 - femoral nerve)	/5	/5
Knee Flexion hamstrings (L5, S1, S2 - sciatic nerve)	/5	/5
Ankle dorsiflexion anterior tibialis (L4, L5- peroneal nerve)	/5	/5
Ankle/Foot Plantar Flexion gastrocnemius, soleus (S1, S2 - tibial nerve)	/5	/5

543. According to AANEM's recommended policy, rarely should a patient receive EMG testing to all 4 limbs.

544. ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical habitually billed for EMG to all 4 extremities in violation of established protocols.

545. Tellingly, the results of the EMG testing were never incorporated into the treatment plan of the Travelers' claimants.

546. Even if every patient treated by ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical actually required EMGs (which they did not), it is virtually

impossible that every patient would require the same number of tests on the same specific nerves given the unique physical characteristics and conditions of each individual patient, particularly if these patients sustained electrodiagnostic abnormalities as alleged.

547. The PC Defendants' utilization of a standardized, protocol approach to EMGs administered to Travelers' claimants serves no meaningful medical purpose, and ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medicals' testing protocols were designed and implemented solely to maximize profit, rather than to aid in the evaluation and treatment of patients.

548. Accordingly, ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medicals' protocol approach to administering EMGs—combined with (a) the gross overuse of these tests, and (b) the failure to properly interpret the tests—demonstrates and exemplifies why all of the charges submitted to Travelers in connection with EMGs administered by ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical to Travelers' claimants are fraudulent.

549. The claims listed in Exhibit 4 demonstrate a clear pattern of ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical use of a specific protocol for the use of EMGs.

550. All of the bills for EMG testing submitted by ENS Medical, Modern Brooklyn, Northern Medical, and Queens Medical are fraudulent, including those identified in Exhibit 4.

551. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

c. Fraudulent Extracorporeal Shockwave Therapy Protocol

552. The Defendants' scheme to defraud included billing for unnecessary and fraudulent ESWT as part of their predetermined treatment protocol to extract insurance payments from Travelers.

553. An integral facet of the Defendants' scheme to defraud involve the submission of false ESWT bills and records to Travelers through the U.S. Mail demanding payment.

554. Pegasus Medical, East Coast Medical, Garden Medical, Lane Medical, Town Medical, Go Medical, and Pitch Medical, among others, submitted false medical documentation to Travelers for bogus ESWT.

555. The ESWT was provided as part of the Defendants' scheme to defraud to maximize medical bills and siphon insurance company proceeds.

556. ESWT is a non-surgical intervention involving the use of high energy shock waves to the musculoskeletal areas of a patient with the purported goal of reducing pain and promoting the healing on the injured soft tissue by stimulating the metabolism, enhancing blood circulation, and accelerating the healing process.

557. The United States Food and Drug Administration has not approved ESWT therapy for the treatment of back, neck, and shoulder pain.

558. The use of ESWT is experimental, investigational, and not necessary to the treatment of Travelers' claimants.

559. Despite the lack of medical necessity, Pegasus Medical, East Coast Medical, Garden Medical, Lane Medical, Town Medical, Go Medical, and Pitch Medical systematically billed Travelers pursuant to CPT Code 0101T for approximately $700.00 per treatment.

560. The Defendants' documentation provides that they utilized Radial Pressure Wave machines to provide ESWT to Travelers' claimants.

561. A true and accurate excerpt of documentation from East Coast Medical regarding Radial Pressure Wave machines is depicted below:



562. In addition, Ahmed testified that they utilized Radial Pressure Wave machines to provide ESWT to Travelers' claimants.

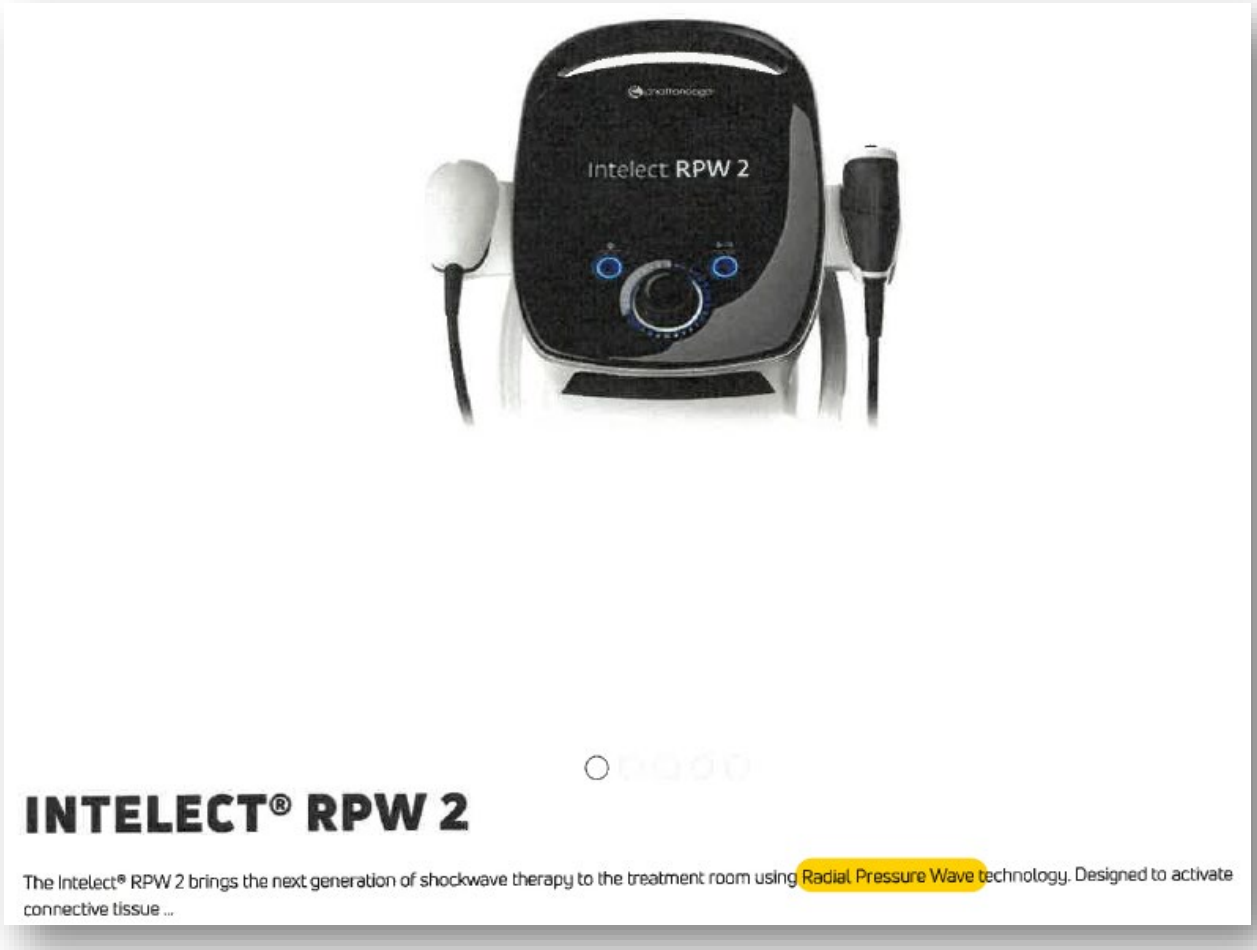
563. A true and accurate excerpt of testimony from Ahmed is depicted below:

Q With respect to the equipment that is owned relating to shockwave, what types of machines do you utilize?

A The Chattanooga Mobile 2 RPW.

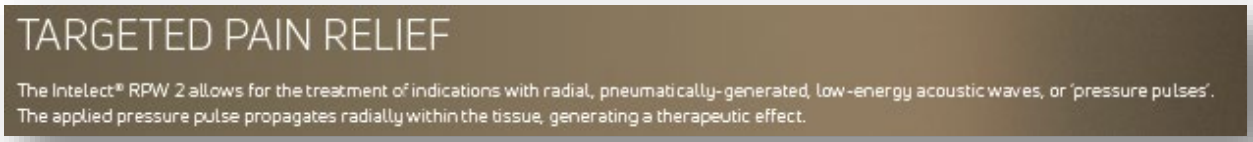
564. The machinery as used by the Defendants was incapable of producing the required high-level energy to properly provide ESWT to Travelers' claimants.

565. A true and accurate excerpt of documentation regarding Chattanooga Shockwave Intelect RPW 2 machines is depicted below:



566. The brochure for the Chattanooga Shockwave Intelect RPW 2 machine identifies itself as using low energy acoustic waves.

567. A true and accurate excerpt from the brochure for the Chattanooga Shockwave Intelect RPW 2 machine is depicted below:

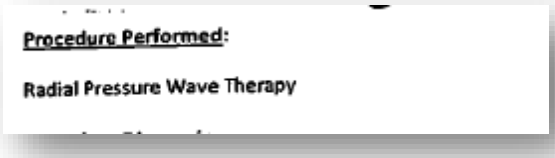


568. While optional attachments for the Chattanooga Shockwave Intelect RPW 2 machine exist that will produce high energy acoustic waves, Pegasus Medical, East Coast

Medical, Garden Medical, Lane Medical, Town Medical, Go Medical, and Pitch Medical never indicate use of these attachments.

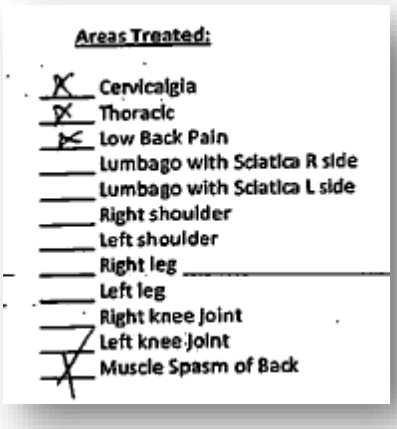
569. Pegasus Medical, East Coast Medical, Garden Medical, Lane Medical, Town Medical, Go Medical, and Pitch Medicals' documentation demonstrates that radial pressure wave therapy was administered to Travelers claimants.

570. A true and accurate representative example of a report from East Coast Medical is depicted below:



571. In most cases, Pegasus Medical, East Coast Medical, Garden Medical, Lane Medical, Town Medical, Go Medical, and Pitch Medical purportedly performed ESWT on multiple parts of a Travelers' claimant's body.

572. A true and accurate representative example of East Coast Medical performing ESWT on multiple parts of a Travelers' claimant's body is depicted below:



573. If the pulses provided (consistently 2000) are split among multiple body parts, it renders the ESWT even more worthless.

574. Pegasus Medical, East Coast Medical, Garden Medical, Lane Medical, Town Medical, Go Medical, and Pitch Medical often billed for greater than 1 ESWT test to a Travelers' claimant during a session, which is not allowed under CPT Code 0101T.

575. Moreover, as only low-level energy shockwaves were administered through radial pressure waves, CPT code 0101T is the incorrect CPT code to bill since it only applies to high-level energy.

576. There is no specific CPT code for low-level energy shockwave therapy such as radial pressure waves. This is more accurately billed under CPT code 20999 (unlisted procedure, musculoskeletal system, general).

577. As of 2020, CPT code 20999 is intended to be billed on a "by report" basis, meaning that the amount will change each time based on what is involved with the treatment.

578. All such billing is fraudulent, including those claims identified in Exhibit 5.

579. All of the bills submitted by Pegasus Medical, East Coast Medical, Garden Medical, Lane Medical, Town Medical, Go Medical, and Pitch Medical for ESWT are fraudulent, including those identified in Exhibit 5.

580. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

d. Fraudulent Transcranial Doppler Testing Protocol

581. The Defendants' scheme to defraud included billing for unnecessary and fraudulent TCD testing as part of their predetermined treatment protocol to extract insurance payments from Travelers.

582. An integral facet of the Defendants' scheme involved the submission of false TCD testing bills and records to Travelers through the U.S. Mail demanding payment.

583. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medical, among others, submitted false medical documentation to Travelers for bogus TCD testing.

584. The TCD testing was provided as part of Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medicals' scheme to defraud to maximize medical bills and siphon insurance company proceeds.

585. TCD testing involves the use of ultrasound tests to evaluate blood flow in the arteries of the brain by using Doppler ultrasound to determine the speed of blood flow through arteries/veins.

586. Increases in the velocity of blood flow may demonstrate narrowing of blood vessels, which may be a sign of a serious health condition.

587. In practice, TCD testing is utilized to monitor previously diagnosed conditions.

588. There are legitimate issues, including: monitoring vasospasm caused by brain aneurysms, monitoring blood flow for children with sickle cell anemia, and monitoring transient ischemic attack and stroke patients. None of the Travelers' claimants presented with any of these conditions.

589. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas

Medical unlawfully billed Travelers for the unnecessary TCD tests pursuant to CPT Code 93886 for at least $108,762.46.

590. A true and accurate representative excerpt of billing for TCD testing from Sanitas Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
SANITAS MEDICAL PC
C/O Korsunskiy Legal Group, 1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED – ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
09/24/2021	1975 Linden Blvd, Elmont, NY, 11003	Transcranial Doppler study of the intracranial arteries ; complete study	1	93886	$ 507.34
09/24/2021	1975 Linden Blvd, Elmont, NY, 11003	Transcranial Doppler study of the intracranial arteries ; vasoreactivity study	1	93890	$ 550.40
09/24/2021	1975 Linden Blvd, Elmont, NY, 11003	Transcranial Doppler study of the intracranial arteries ;emboli detection without intravenous microbubble injection	1	93892-59	$ 584.05

TOTAL CHARGES TO DATE $ 1641.79

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmad	MD	Lic # 25MA10500500	Yes		

591. In addition to this, Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medical also unlawfully billed Travelers for the unnecessary TCD tests pursuant to CPT Code 93888 for at least $913.22.

592. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medical unlawfully billed Travelers more than $85,572.81 for the unnecessary vasoreactivity tests pursuant to CPT Code 93890.

593. This test is used as a predicate to a rare surgery to reduce the risk of transient ischemic attack or stroke.

594. None of the Travelers' claimants presented with conditions requiring this rare test.

595. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medical unlawfully billed Travelers more than $90,380.75 for the unnecessary emboli detection tests pursuant to CPT Code 93892.

596. This test is utilized to locate whether small clots may be traveling in a patient's blood stream toward the brain to prevent transient ischemic attack or stroke symptoms.

597. None of the Travelers' claimants presented with conditions requiring this rare test.

598. None of the Travelers' claimants required any of these tests.

599. Moreover, none of the Travelers' claimants possessed a medically documented need to receive Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medicals' battery of TCD testing.

600. The results of the TCD testing are almost always normal, further confirming that the tests are not medically necessary.

601. Regardless, the results of the TCD testing were never incorporated into a Travelers' claimant's treatment plan thereby rendering such testing medically worthless.

602. In addition, it is virtually never medically necessary to provide a patient both TCD and emboli detection testing.

603. All of the bills submitted by Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medical for TCD testing are fraudulent, including those identified in Exhibit 6.

604. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, and Sanitas Medical billed for these TCD tests in connection with many Travelers' claimants, including those identified in Exhibit 6.

605. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

e. Fraudulent Videonystagmography Testing Protocol

606. The Defendants' scheme to defraud included billing for unnecessary and fraudulent VNG testing as part of their predetermined treatment protocol to extract insurance payments from Travelers.

607. An integral facet of the Defendants' scheme involved the submission of false VNG testing bills and records to Travelers through the U.S. Mail demanding payment.

608. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical, among others, submitted false medical documentation to Travelers for bogus VNG testing.

609. The VNG testing was provided as part of Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical's scheme to defraud to maximize medical bills and siphon insurance company proceeds.

610. VNG testing involves tests to determine the cause of a patient's vertigo or balanced disorders where are no other contributing factors to a patient's condition.

611. VNG testing consists of video recording, infrared eyeglasses that track and record eye movements as a patient is subjected to different tasks.

612. These tracks include tracking visual targets, holding their gaze, and undergoing positional; and caloric (temperature) stimulation.

613. Although VNG testing may be clinically appropriate based upon complaints or findings from a clinical history or evaluation, Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical systematically performed unnecessary VNG testing in connection with Travelers' claimants.

614. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical failed to perform the required evaluations to necessitate VNG testing to the Travelers' claimants.

615. Although it is difficult to discern from the Defendants' medical documentation, it appears as though Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical billed for the same battery of VNG testing, including: (a) basic

vestibular evaluation; (b) sinusoidal vertical axis rotational testing; (c) caloric vestibular test; and (d) computerized dynamic posturography platform.

616. It is highly unlikely that a Travelers' claimant required all of these vestibular tests.

617. Moreover, it is unbelievable that most Travelers' claimants possessed a medically documented need to receive Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical's battery of VNG testing.

618. Importantly, VNG testing should not be used as a tool to identify vestibular dysfunction, but rather to identify the site of a previously identified dysfunction.

619. VNG testing is limited to circumstances to determine the origin of the patient's vertigo.

620. As such, none of the VNG testing that Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical billed to Travelers was medically necessary because any such vertigo or dizziness symptoms were caused by an automobile accident.

621. Even if a Travelers' claimant was experiencing vertigo, dizziness, or imbalance, those systems could be identified through physical examination rather than the expensive diagnostic testing utilized by Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical.

622. To properly administer a VNG test, the patient must be appropriately prepared, which typically requires discontinuing the use of most medications 72 hours in advance of testing; discontinuing most stimulants, such as caffeine, within 24 hours of testing; and discontinuing food consumption three hours prior to testing.

623. In addition, patients must be provided with a pre-test history and examination to determine, among other things, the nature of the symptoms in the patient's eye movements.

624. Virtually none of the Travelers' claimants appeared to receive the necessary pre-test preparation.

625. Notwithstanding the pre-test requirements, many of the Travelers' claimants were subjected to VNG testing on the initial date of treatment precluding any such preparation.

626. The results of the VNG testing are almost always normal, further confirming that the tests are not medically necessary.

627. Regardless, the results of the VNG testing were never incorporated into a Travelers' claimant's treatment plan, thereby rendering all such testing medically worthless.

628. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical billed for VNG testing under CPT codes 92540, 92541, 92542, 92544, and 92545.

629. CPT code 92540 is for a basic vestibular evaluation, including a spontaneous nystagmus test with eccentric gaze fixation nystagmus, with recording, a positional nystagmus test on a minimum of four positions with recording, an optokinetic nystagmus test that is bidirectional, foveal, and peripheral stimulation, with recording, and an oscillating tracking test that includes recording.

630. CPT code 92541 is a spontaneous nystagmus test that includes gaze and fixation nystagmus, with recording.

631. CPT code 92542 is for a positional nystagmus test on a minimum of four positions, with recording.

632. CPT code 92544 is for an optokinetic nystagmus test that is bidirectional, foveal, or peripheral stimulation, with recording.

633. CPT code 92545 is for an oscillating tracking test that includes recording.

634. Importantly, none of these codes should ever be billed together, as CPT code 92540 necessarily includes everything contained within CPT codes 92541, 92542, 92544, and 92545.

635. However, Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical regularly unbundled CPT code 92540 when they billed multiple CPT codes for VNG on the same bill for the same date of service, fraudulently increasing bills submitted to Travelers.

636. A true and accurate representative excerpt of a bill submitted by Beckles MD PC is depicted below:


PROVIDER'S NAME AND ADDRESS*
Alan Beckles MD
C/O Korsunskiy Legal Group. 1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537	$ 87.12
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	spontaneous nystagmus test including gaze and fixation nystagmus, with recording	1	92541	$ 106.71
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	positional nystagmus test, minimum of 4 positions, with recording	1	92542	$ 95.42
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	optokinetic nystagmus test, bidirectional foveal and peripheral stimulation with recording	1	92544	$ 58.01
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Oscillating tracking test , with recording	1	92545	$ 58.01
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Sinusoidal vertical axis rotational testing	1	92546-59	$ 91.77
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Sinusoidal vertical axis rotational testing	1	92546-59-76	$ 91.77
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547	$ 56.12
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Computerized dynamic posturography	1	92548	$ 187.19

TOTAL CHARGES TO DATE $ 832.12

VERIFICATION OF TREATMENT BY ATTENDING PHYSICIAN OR OTHER PROVIDER OF HEALTH SERVICE
PAGE 3

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

637. Every time that Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical billed for at least two CPT codes for VNG on the same date of service, they were fraudulently billing Travelers.

638. All of the bills submitted by Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Northern Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical for VNG testing are fraudulent, including those identified in Exhibit 7.

639. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

f. Fraudulent Quantitative Sudomotor Axon Reflex Testing Treatment Protocol

640. The Defendants' scheme to defraud included billing for unnecessary and fraudulent QSART testing as part of their predetermined treatment protocol to extract insurance payments from Travelers.

641. An integral facet of the Defendants' scheme involved the submission of false QSART testing bills and records to Travelers through the U.S. Mail demanding payment.

642. Beckles MD PC, Five Towns, Levitan Medical, Pitch Medical, and Ridgewood Medical, among others, submitted false medical documentation to Travelers for bogus QSART testing.

643. The QSART testing was provided as part of Beckles MD PC, Five Towns, Levitan Medical, Pitch Medical, and Ridgewood Medical's scheme to defraud to maximize medical bills and siphon insurance proceeds.

644. QSART testing involves testing the nerves which control your sweat and may help determine whether you have a condition that affects your autonomic nervous system.

645. QSART testing measures the volume of your sweat by electrically stimulating your skin.

646. Although QSART testing may be clinically appropriate based upon complaints or findings from a clinical history or evaluation, Beckles MD PC, Five Towns, Levitan Medical, Pitch Medical, and Ridgewood Medical systematically performed unnecessary QSART testing in connection with Travelers' claimants regardless of the need.

647. It is highly unlikely that the majority of Travelers' claimants required QSART testing.

648. Moreover, the necessary referral was not always obtained to justify the QSART testing.

649. Sometimes, Ahmed billed Travelers for QSART testing based upon a referral that was dated before the initial evaluation.

650. A true and accurate excerpt of a representative example of treatment submitted to Travelers for claimant F.F. (Claim No. IPG0747) is depicted below:

PROVIDER'S NAME AND ADDRESS

Functional Rehabilitation Medicine, PC

PO Box 290630 Brooklyn NY 11229-0630

15. REPORT OF SERVICES RENDERED ****All services have been rendered at: 30-55 3rd Ave, Suite# B, Bronx NY 10451**

Date of Service	Place of Service	Description of Treatment or Health Service Rendered	Fee Schedule Treatment Code	Charges
03/21/22	**	Initial Comprehensive Visit - 45min*	99204 - 25	$203.76
03/21/22	**	Trigger Points Injections	20553	$131.01
03/21/22	**	Nerve Block Injection - Lumbar or Thoracic Paraver	64520	$297.28
03/21/22	**	Ultrasonic guidance for needle placement	76942	$289.20
			TOTAL CHARGES TO DATE	$921.25

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NUMBER	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Alan Friedman	PM&R	197575	X		

***

Physiatry and Electrodiagnostic Evaluation
Alan Friedman, M.D.

Re: [redacted]
DOB: [redacted] 1962
DOA: 03/15/2022
Date of Evaluation: 03/21/2022

***

NEUROLOGICAL REFERRAL SCRIPT

Patient's Name [redacted] DOB [redacted] Patient Address [redacted]
Primary Insurance The Standard Fire Secondary Insurance

__Dizziness (R42)
__Increased susceptibility to falling (Z91.81)
__Peripheral vertigo, unspecified (H81.399)
__Awkward uncoordinated walking (R26.9)
__Loss of coordination of voluntary muscular movement (R27.0)
__Vertigo of central origin (H81.49)
__Meniere's disease, unspecified (H81.09)
__BPPV (H81.13)

__ Carotid Stenosis (I65.29)
__ Carotid Artery Syndrome (G45.1)
__Other cerebral infarction (I63.8)
__Occlusion and Stenosis basilar artery (I65.1)
__Occlusion and stenosis of other cerebral arteries (I66.8)
__Other transient cerebral ischemic attacks and related syndromes (G45.8)

__ G60.9 Neuropathy, peripheral
__ G35 Multiple Sclerosis
__ G90.0 - G90.9 Disorders of autonomic nervous system
__ R55 Syncope and collapse
__ R00.0 Tachycardia (postural)
__ Other.

__ Neuropathy motor and sensory (G60.0)
__ Carpal tunnel / med. Nerve (G56.00)
__ Radiculopathy, Cervical Region (M54.12)
__ Radiculopathy, Lumbar Region (M54.16)
__ Tarsal tunnel, unspecified lower limb (G57.50)

__ Orthostatic Hypotension (I95.1)
__Other hereditary and Idiopathic neuropathy (G60.8)
__Hereditary and idiopathic neuropathy unspecified (G60.9)
__Heredofamilial amyloidosis, unspecified (G85.2)
__Type 2 DM with diabetic neuropathy, unspecified (E11.40)
__ Diabetes mellitus due to underlying condition with diabetic neuropathy (unsp) (E08.40)
__ Hypertension (I10)
__ Orthostatic Hypotension (I95.1)
__ Tachycardia (unsp) (R00.0)
__ Syncope and collapse (R55)
__ Other idiopathic peripheral autonomic neuropathy (G90.09)

__F34.1 Depression
__ G25.3 Myoclonus
__G95.0-G95.9 Other disease of spinal cord
__ G35 Multiple sclerosis
__ M47.12 Cervical spondylosis with myelopathy
__ E88.9 Metabolic Disorder Unspecified
__ E11.40,E10.40,E11.65 Diabetes with neurological manifestations
__D51.9 Vitamin B12 deficiency anemia, unspecified
__E56.0 Vitamin E deficiency

__R41.82 Altered Mental Status
__R29.6 Repeated Falls
__F34.1 Depression
__G40.89 Other Seizures
__G93.9 disorder of brain, unspecified
__F51.02 Insomnia
__F41.9 Anxiety State
__F09 Unspecified mental disorder due to known physiological condition
__R55 Syncope and collapse
__R41.0 Disorientation
__R40.4 Transient alteration of awareness
__R25.9 Unsp abnormal involuntary movements
__R25.3 Fasciculation
__R25.2 Cramp and spasm
__R25.0 Abnormal Head movements
__R41.82 Altered mental status unspecified

_ Z09 Follow up visit after treatment
_ I73.9 Peripheral Vascular Disease
_E10.59 Type 1 diabetes
_E11.59 Type 2 diabetes
_E13.59 other specified diabetes

Based on the patient's examination, diagnosis, and history, it is my professional opinion that the above specified tests are medically necessary for the diagnosis and treatment of this patient.

Physician's Signature: _____ Physician's Name: Friedman, Alan Date: 3/17/22

***

PROVIDER'S NAME AND ADDRESS*
Alan Beckles MD
C/O Korsunskiy Legal Group, 1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
03/17/2022	3055 3rd Ave, Bronx, NY, 10451	Testing of autonomic nervous system function; sudomotor, including 1 or more of the following: quantitative sudomotor axon reflex test (QSART), silastic sweat imprint, thermoregulatory sweat test, and changes in sympathetic skin potential- lower ext	1	95923	$ 222.61
03/17/2022	3055 3rd Ave, Bronx, NY, 10451	Testing of autonomic nervous system function; sudomotor, including 1 or more of the following: quantitative sudomotor axon reflex test (QSART), silastic sweat imprint, thermoregulatory sweat test, and changes in sympathetic skin potential- Upper ext	1	95923	$ 222.61

TOTAL CHARGES TO DATE $ 445.22

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

***

SYMPATHETIC SKIN RESPONSE REPORT

Patient: F[redacted] F[redacted]
Date of Birth: [redacted]1982 (age: 39, Male)
Study time: 03/17/2022
Accession: 598910 / allmed.emsow.com
Referring: 3055 3rd Ave Bronx, NY 10451 / Friedman, Alan
Technologist: Greenberg, Yefim

Impression:
This Foot SSR study is abnormal and findings are consistent with peripheral neuropathy.Clinical correlation is recommended.
The testing was performed by a technician and interpretation is solely based on the graphics and tracing provided in this report. All recommendations and treatment options should be discussed by treating physician.

Signed by: Omar Ahmed / Ahmed, Omar
Signed at: 03/22/2022

651. The referral services indicated above emanated from the same address as the QSART testing.

652. Ahmed is utilizing his locations as a mill to produce fraudulent referrals to justify medically unnecessary testing such as QSART testing.

653. All of the bills submitted by Beckles MD PC, Five Towns, Levitan Medical, Pitch Medical, and Ridgewood Medical for QSART testing are fraudulent, including those identified in Exhibit 8.

654. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

g. Fraudulent Caloric Vestibular Testing Treatment Protocol

655. The Defendants' scheme to defraud included billing for unnecessary and fraudulent CVT testing as part of their predetermined treatment protocol to extract insurance payments from Travelers.

656. An integral facet of the Defendants' scheme involved the submission of false CVT testing bills and records to Travelers through the U.S. Mail demanding payment.

657. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical, among others, submitted false medical documentation to Travelers for bogus CVT testing.

658. The CVT testing was provided as part of Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical's scheme to defraud to maximize medical bills and siphon insurance company proceeds.

659. CVT testing is a test designed to diagnose balance and inner ear issues by irrigating the ears with water of various temperatures.

660. Although CVT testing may be clinically appropriate based upon complaints or findings from a clinical history or evaluation, Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical systematically performed unnecessary CVT testing in connection with Travelers' claimants.

661. Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical failed to perform the required evaluations to necessitate CVT testing to the Travelers' claimants.

662. Even if a Travelers' claimant was experiencing vertigo, dizziness, or imbalance, those systems could be identified through physical examination rather than the expensive

diagnostic testing utilized by Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical.

663. All of the bills submitted by Beckles MD PC, Esplanade Medical, Five Towns, Levitan Medical, Pegasus Medical, Pitch Medical, Queens Medical, Ridgewood Medical, Sanitas Medical, and Terrace Medical for CVT testing are fraudulent, including those identified in Exhibit 9.

664. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

C. FRAUDULENT BILLING CONDUCT

1. Fraudulent Ownership

665. Gelb falsely claimed on nearly every bill for Town Medical that she was the owner.

666. A true and accurate representation of a Town Medical bill is depicted below:


PROVIDER:
TOWN MEDICAL CARE PC C/O Law Offices of Gabriel & Moroff, PC
2 LINCOLN AVE SUITE 302
Rockville Centre NY 11570

15. REPORT OF SERVICES RENDERED – ATTACH ADDITIONAL SHEETS IF NECESSARY

DATE OF SERVICE	PLACE OF SERVICE INCLUDING ZIP CODE	DESCRIPTION OF TREATMENT OR HEALTH SERVICE RENDERED	FEE SCHEDULE TREATMENT CODE	CHARGES
03/18/21	2426 EASTCHESTER RD Bronx NY 10469	SHOCKWAVE THERAPY T/SP	0101T	700.39
03/18/21	2426 EASTCHESTER RD Bronx NY 10469	OFFICE CONSULTATION 15 MINS	99241 - 25	152.86
			TOTAL CHARGES TO DATES	$ 853.25

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
GELB, PHYLLIS MARTHA	MD	202216-01		☐	Owner

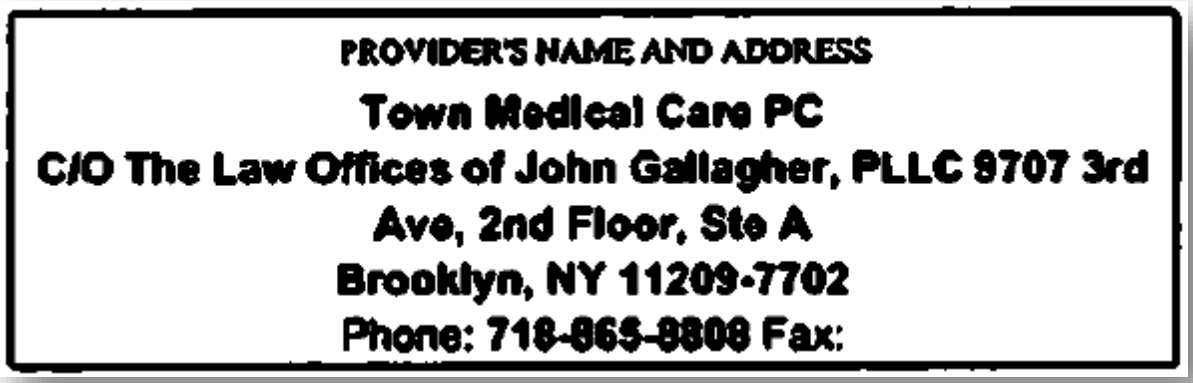
17. IF THE PROVIDER OF SERVICE IS A PROFESSIONAL SERVICE CORPORATION OR DOING BUSINESS UNDER AN ASSUMED NAME (DBA), LIST THE OWNER AND PROFESSIONAL LICENSING CREDENTIALS OF ALL OWNERS (Provide an additional attachment if necessary).

PHYLLIS MARTHA GELB, LIC# 202216-01

DATE	PROVIDER'S SIGNATURE
03/24/2021	PHYLLIS MARTHA GELB

667. Town Medical has also submitted bills where Gelb is portraying herself as merely an employee in box 16 of the NF-3 but also referring to herself as the President of Town Medical in box 17 of the NF-3.

668. A true and accurate excerpt of a representative example of a Town Medical bill is depicted below:



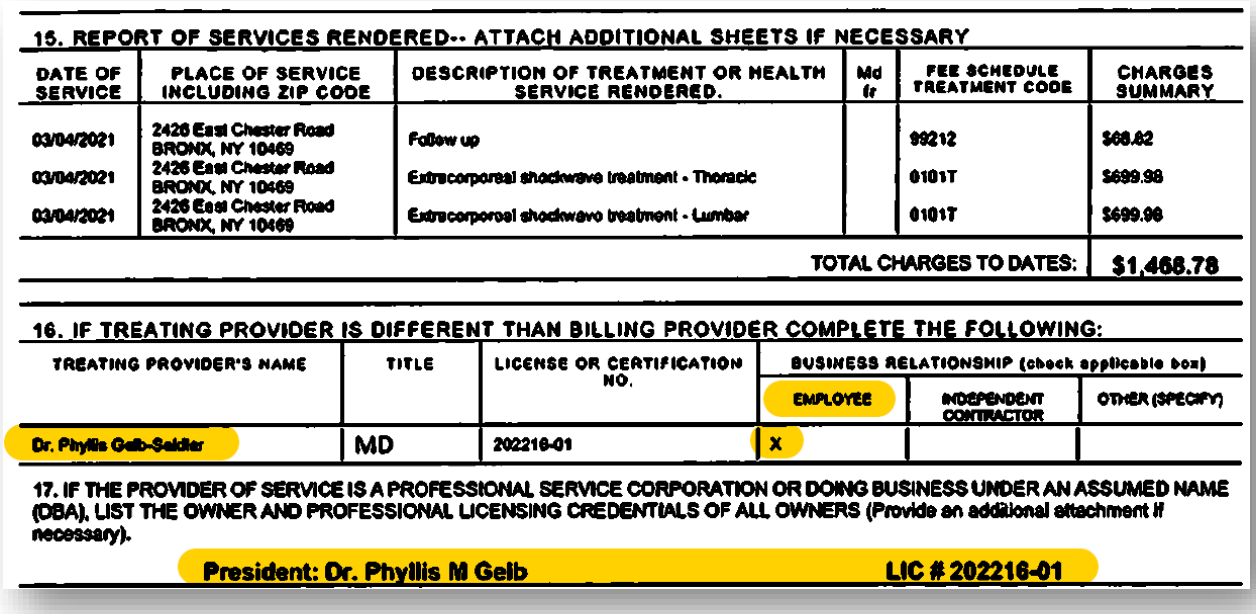
PROVIDER'S NAME AND ADDRESS

Town Medical Care PC

C/O The Law Offices of John Gallagher, PLLC 9707 3rd Ave, 2nd Floor, Ste A

Brooklyn, NY 11209-7702

Phone: 718-865-9808 Fax:



15. REPORT OF SERVICES RENDERED-- ATTACH ADDITIONAL SHEETS IF NECESSARY

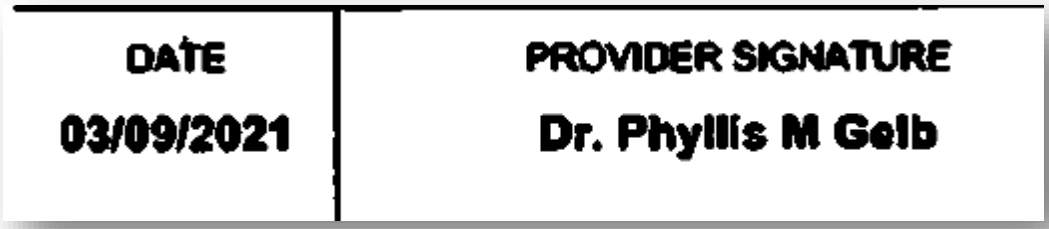
DATE OF SERVICE	PLACE OF SERVICE INCLUDING ZIP CODE	DESCRIPTION OF TREATMENT OR HEALTH SERVICE RENDERED.	Md fr	FEE SCHEDULE TREATMENT CODE	CHARGES SUMMARY
03/04/2021	2426 East Chester Road BRONX, NY 10469	Follow up		99212	$68.82
03/04/2021	2426 East Chester Road BRONX, NY 10469	Extracorporeal shockwave treatment - Thoracic		0101T	$699.98
03/04/2021	2426 East Chester Road BRONX, NY 10469	Extracorporeal shockwave treatment - Lumbar		0101T	$699.98
				TOTAL CHARGES TO DATES:	$1,468.78

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP (check applicable box)		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Dr. Phyllis Gelb-Soldier	MD	202216-01	X		

17. IF THE PROVIDER OF SERVICE IS A PROFESSIONAL SERVICE CORPORATION OR DOING BUSINESS UNDER AN ASSUMED NAME (DBA), LIST THE OWNER AND PROFESSIONAL LICENSING CREDENTIALS OF ALL OWNERS (Provide an additional attachment if necessary).

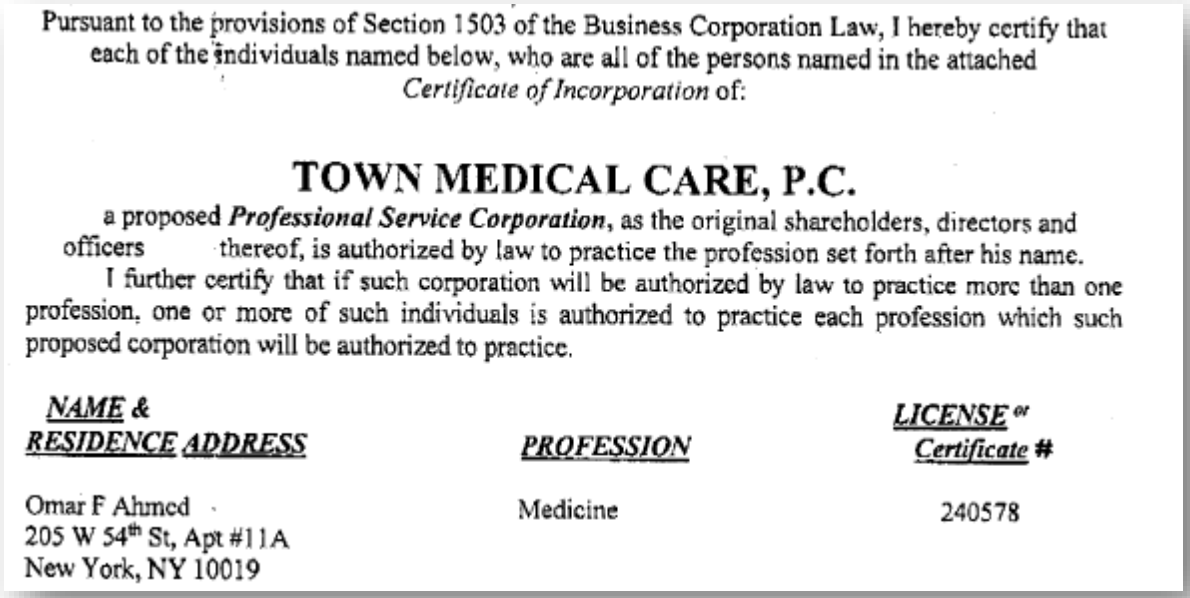
President: Dr. Phyllis M Gelb LIC # 202216-01



DATE	PROVIDER SIGNATURE
03/09/2021	Dr. Phyllis M Gelb

669. Upon inception, Town Medical has been owned on paper by Ahmed but secretly owned by unlicensed laypersons.

670. A true and accurate representation of the Town Medical Certificate of Incorporation is depicted below:



Pursuant to the provisions of Section 1503 of the Business Corporation Law, I hereby certify that each of the individuals named below, who are all of the persons named in the attached *Certificate of Incorporation* of:

TOWN MEDICAL CARE, P.C.

a proposed ***Professional Service Corporation***, as the original shareholders, directors and officers thereof, is authorized by law to practice the profession set forth after his name.

I further certify that if such corporation will be authorized by law to practice more than one profession, one or more of such individuals is authorized to practice each profession which such proposed corporation will be authorized to practice.

NAME & RESIDENCE ADDRESS	***PROFESSION***	***LICENSE or Certificate #***
Omar F Ahmed 205 W 54th St, Apt #11A New York, NY 10019	Medicine	240578

671. The New York Department of State does not have a record of any filings regarding a change in ownership.

672. Indeed, in a separate litigation, Gelb admitted in her Answer that she is not the owner of Town Medical. *See State Farm Mut. Auto. Ins. Co. v. ENS Medical, P.C.*, 1:23-cv-06937-OEM-VMS at ECF No. 61 (E.D.N.Y. Dec. 29, 2023).

673. A true and accurate example of Gelb's Answer in *State Farm Mutual Automobile Insurance Company v. ENS Medical, P.C.* is depicted below:

Defendant PHYLLIS SEIDLER GELB, M.D. (hereinafter referred to as the "Defendant") by her attorneys ZIMMERMAN LAW, P.C. as and for her Answer to the Complaint herein alleges as follows upon information and belief:

***

7. Defendant denies having knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 27 except Defendant admits that she is not the owner of Town Medical.

674. Gelb is merely a nominal owner who rented her medical license to unknown non-medical professionals for compensation so she could be thrust into the fraudulent "ownership" role of Town Medical and aid unlicensed laypersons in evading detection for his fraudulent billing practices.

675. Yet, Gelb is misrepresented as the owner on nearly every bill for Town Medical.

676. Upon information and belief, to the extent any of the services on these Town Medical bills were actually provided, they were performed by unsupervised independent contractor physician assistants.

677. Under the New York No-Fault laws, services provided by independent contractors are not compensable.

678. All of the bills submitted by Town Medical are fraudulent, including those identified in Exhibit 10.

679. All such fraudulent bills traveled through the U.S. Mail and Travelers expressly relied on those bills when tendering insurance payments.

2. Fraudulent Billing for Examinations

680. In certain instances, Modern Brooklyn, Queens Medical, and Terrace Medical rendered EDX testing during a patient's first office visit after performing the initial examination, while in other instances, the PC Defendants simply examined the patient at the first visit and then required the patient to return to one of the PC Defendants on a later date to undergo bogus diagnostic testing.

681. However, when the Travelers' claimants returned to Modern Brooklyn, Queens Medical, and Terrace Medical to receive EDX testing, Modern Brooklyn, Queens Medical, and Terrace Medical would often bill Travelers for a follow-up examination (under CPT Codes 99211-99215) of that patient.

682. The purpose of performing a history and physical examination prior to performing diagnostic testing is to develop a differential diagnosis so that an appropriate test (if any) can be designed to evaluate for the etiology of the patient's pain.

683. Therefore, it was unlawful for Modern Brooklyn, Queens Medical, and Terrace Medical to bill Travelers for a second examination at the follow-up visit because Modern Brooklyn, Queens Medical, and Terrace Medical had already examined these patients at their initial consultation and had developed a differential diagnosis that could be used to design an appropriate course of care, possibly including diagnostic testing.

684. Also, as discussed above, Modern Brooklyn, Queens Medical, and Terrace Medical employed a predetermined protocol approach to diagnostic testing.

685. Although a proper examination includes the development of an individualized and tailored treatment plan, Modern Brooklyn, Queens Medical, and Terrace Medical employed the predetermined treatment protocol whereas the Travelers' claimants' clinical presentations clearly

had no impact on the diagnostic testing performed or the nerves and muscles tested in the EDX study—accordingly, these EDX tests were worthless.

686. Further, in certain instances, ENS Medical, Esplanade Medical, Modern Brooklyn, Northern Medical, Pitch Medical, Queens Medical, and Terrace Medical falsely inflated and purposely misrepresented the charges submitted to Travelers by billing for follow-up examinations under CPT Code 99214.

687. The criteria developed by the AMA to properly assign CPT Code 99214 to a service include a number of components and factors, with history, physical examination, and medical decision-making being the three (3) key components.

688. To warrant a medical bill demanding payment for a service billed under CPT Code 99214, the CPT codebook requires at least two of the following: (a) a comprehensive history, (b) a comprehensive examination, and (c) medical decision making of moderate complexity.

689. Typically, for a follow-up examination to be billed under CPT Code 99214, the patient must present with a problem of moderate severity.

690. Follow-up examinations billed under CPT Code 99214 also typically require the physician to spend thirty (30) minutes face-to-face with the patient and/or family.

691. The factors considered to determine the "complexity of medical decision-making" in arriving at a proper CPT Code assignment include:

	NUMBER OF DIAGNOSES OR MANAGEMENT OPTIONS	AMOUNT AND/OR COMPLEXITY OF DATA TO BE REVIEWED	RISK OF COMPLICATIONS AND/OR MORBIDITY OR MORTALITY
CPT Code 99214	Moderate	Moderate	Moderate

692. Here, the clinical documentation submitted to Travelers by, or on behalf of, ENS Medical, Esplanade Medical, Modern Brooklyn, Northern Medical, Pitch Medical, Queens Medical, and Terrace Medical fails to establish any of the elements required to sustain a charge under CPT Code 99214—a moderate history, a moderate examination, or medical decision-making of moderate complexity.

693. Finally, the follow-up examination reports submitted to Travelers by East Coast Medical, ENS Medical, Esplanade Medical, Garden Medical, Go Medical, Lane Medical, Modern Brooklyn, Northern Medical, Pitch Medical, Queens Medical, Terrace Medical, and Town Medical conclude that virtually every one of the Travelers claimants must continue therapy (with the referring providers), receive additional tests or studies, with one or more of East Coast Medical, ENS Medical, Esplanade Medical, Garden Medical, Go Medical, Lane Medical, Modern Brooklyn, Northern Medical, Pitch Medical, Queens Medical, Terrace Medical, and Town Medical, regardless of the patient's actual physical condition.

694. These statements were intentionally included in East Coast Medical, ENS Medical, Esplanade Medical, Garden Medical, Go Medical, Lane Medical, Modern Brooklyn, Northern Medical, Pitch Medical, Queens Medical, Terrace Medical, and Town Medical's examination reports to support the predetermined treatment protocol by ensuring that the Travelers' claimants were ushered to the treatment slated to be provided next in the scheme—not because the defendants' patients actually required continued testing and/or treatment.

695. The chart annexed at Exhibit 11 identifies all of the patients treated by East Coast Medical, ENS Medical, Esplanade Medical, Garden Medical, Go Medical, Lane Medical, Modern Brooklyn, Northern Medical, Pitch Medical, Queens Medical, Terrace Medical, and

Town Medical who purportedly received excessive, unnecessary, and/or improperly billed follow-up examinations.

696. Because (a) the follow-up examinations were wholly unnecessary to arrive at a differential diagnosis, (b) these examinations were nothing more than a product of the Defendants' scheme to inflate patient charges through the provision of excessive and unnecessary services, (c) the examination was utilized solely to facilitate the predetermined treatment protocol, and (d) in certain instances, the services were falsely charged, the defendants are not entitled to collect payment for such services under New York law.

697. Accordingly, to the extent that Travelers paid the defendants in reliance on the documents created and submitted in connection with these patient follow-up examinations, Travelers is entitled to recover all payments made to the Defendants in connection with the follow-up examinations whereas the nature and extent of the examinations were materially represented and the services were falsely charged.

698. Moreover, to the extent any of the charges itemized in Exhibit 11 remain unpaid or have been denied, Travelers is under no obligation to make any payments in connection with those transactions because the charges submitted by the Defendants in connection with these services are not compensable under New York laws for the reasons set forth above.

D. UNLAWFUL BILLING FOR SERVICES PROVIDED BY INDEPENDENT CONTRACTORS

699. To be eligible for reimbursement under New York law, a professional corporation is entitled to payment from an insurer only if, *inter alia*, the professional corporation—through an owner or employee thereof—is the actual provider of the billed-for services.

700. A healthcare provider's use of independent contractors, rather than employees, to provide healthcare services renders the provider ineligible to receive reimbursement under New York law. *See* DOI Opinion Letters, annexed hereto as Exhibit 12.

701. Upon information and belief, throughout the relevant period, the PC Defendants have submitted bills to Travelers that include charges for services provided by independent contractors.

702. In *Gov't Emps. Ins. Co. v. Ahmed*, C.A. 1:25-cv-05750, ECF No. 1 (E.D.N.Y. 2025), it was alleged that Sherrie Rawlins, M.D. is an independent contractor due to her transient nature at several of the PC Defendants.

703. A true and accurate representative example of *Gov't Emps. Ins. Co. v. Ahmed*, C.A. 1:25-cv-05750, ECF No. 1 (E.D.N.Y. 2025) is depicted below:

> 373. For example, Sherrie Rawlins, M.D. ("Rawlins"), a health care professional who purportedly provided healthcare services on behalf of Terrace and Pegasus from February 2023 through May 2023, also purportedly provided healthcare services through three additional medical practices who also submitted billing to GEICO during this time. In fact, Rawlins has purportedly provided healthcare services on behalf of over 20 different medical practices since 2020, including during the time Rawlins purportedly owned and controlled several of her own medical practices, Sherrie Rawlins Medical P.C. and a sole proprietorship, from September 2021 through December 2022.

704. Sherrie Rawlins, M.D. was identified as the treating provider in bills submitted to Travelers by ENS Medical, Pegasus Medical, and Pitch Medical.

705. In *Gov't Emps. Ins. Co. v. Ahmed*, C.A. 1:25-cv-05750, ECF No. 1 (E.D.N.Y. 2025), it was alleged that Yong Chi, M.D. is an independent contractor due to his transient nature at several of the PC Defendants.

706. A true and accurate representative example of *Gov't Emps. Ins. Co. v. Ahmed*, C.A. 1:25-cv-05750, ECF No. 1 (E.D.N.Y. 2025) is depicted below:

374. In further keeping with the fact that the Defendants' billed for the Fraudulent Services which were actually performed by independent contractors, many of the Fraudulent Services were purportedly performed by Yong Chi, M.D. ("Chi"), including treatment through Terrace, Pegasus, and Parkside.

707. Yong Chi, M.D. was identified as the treating provider in bills submitted to Travelers by ENS Medical, Northern Medical, and Terrace Medical.

708. Because such physician services were rendered by an independent contractor, the PC Defendants were never the direct provider of the healthcare services that were billed to Travelers.

709. Accordingly, in all such instances, the PC Defendants were completely ineligible to receive reimbursement for those billed-for services under New York laws.

E. BILLING PURSUANT TO UNLAWFUL REFERRAL ARRANGEMENTS

710. NY Public Health Law § 238-a prohibits certain health care service providers from referring the performance of services such as medical testing and other services to those with whom they have a financial relationship. *See* N.Y. Pub. Health L. § 238-a(1)(a).

711. In the event that Section 238-a is violated, ***neither*** the referring provider nor the provider of the service are entitled to payment from a third-party insurer, such as Travelers. *See* N.Y. Pub. Health L. § 238-a(1)(b).

712. Moreover, N.Y. Pub. Health L. § 238-a(7) provides that if a referring practitioner or the healthcare provider receiving the unlawful referral collects monies in violation of this law, both the referring provider and the healthcare provider shall be jointly and severally liable to the payor.

713. Section § 238-d(2) requires that the disclosure "provide notice of any such financial relationship and shall also inform the patient of his or her right to utilize a specifically identified alternative health care provider if any such alternative is reasonably available."

714. If a referral is subject to section 238-d and the disclosure requirement is not met, then the provider has failed to comply with applicable licensing requirements and is therefore ineligible to collect insurance payments.

715. The Defendants all share a financial relationship subject to the New York Public Health Law.

716. The Healthcare Defendant's involvement with the PC Defendants was both intentional and crucial to the financial success of the scheme.

717. The Healthcare Defendants engaged in bogus lease agreements with medical mill clinics and the unknown layowners to cultivate symbiotic relationships between and establish unlawful referral arrangements among their professional corporations.

718. Neither the referring PCs nor the PC Defendants provided the required informed consent disclosures when referring Travelers claimants to the PC Defendants in violation of N.Y. Pub. Health L. §§ 238-a and 238-d.

719. These referrals resulted in additional healthcare services, which, in turn, caused unlawful bills submitted to Travelers seeking insurance reimbursement.

720. All of these claims and bills were furnished pursuant to an illegal arrangement carried out through lease and licensing agreements through which the medical mill PCs referred patients to-and-from the PC Defendants, thus rendering these claims and bills fraudulent.

721. Where applicable, the PC Defendants also did not properly disclose to their patients that financial relationships existed between the PC Defendants and referring providers.

722. The failure to disclose the PC Defendants' financial interests in the referrals was intentional.

723. Indeed, any such disclosure would have revealed the PC Defendants carefully concealed fraudulent scheme, and may have drawn questions from patients and insurers about the legitimacy of the referrals and the resulting treatment.

724. Under New York law, Travelers has no obligation to pay any claims that arise from unlawful referral arrangements.

725. Accordingly, to the extent that Travelers paid the PC Defendants in reliance on documents created and submitted to Travelers in connection with these unlawful referrals, including, but not limited to, those payments listed in Exhibits 13-24, Travelers is entitled to recover all payments made in connection with any such service.

726. In connection with the claims submitted to Travelers, the Defendants failed to disclose the financial and/or familial relationships thus rendering all treatment by the PC Defendants unlawful.

727. To the extent that any of the PC Defendants' charges submitted in connection with unlawful referrals remain unpaid, Travelers is under no obligation to make any payments in connection with those transactions.

F. FRAUDULENT BILLING UNDER OMAR H. AHMED, M.D. NAME AND MEDICAL LICENSE

728. The Fictitious Billing PCs also billed for services not rendered in connection with billing submitted on behalf of non-party Omar H. Ahmed, M.D.

729. Omar H. Ahmed, M.D. is a medical doctor properly licensed in New Jersey.

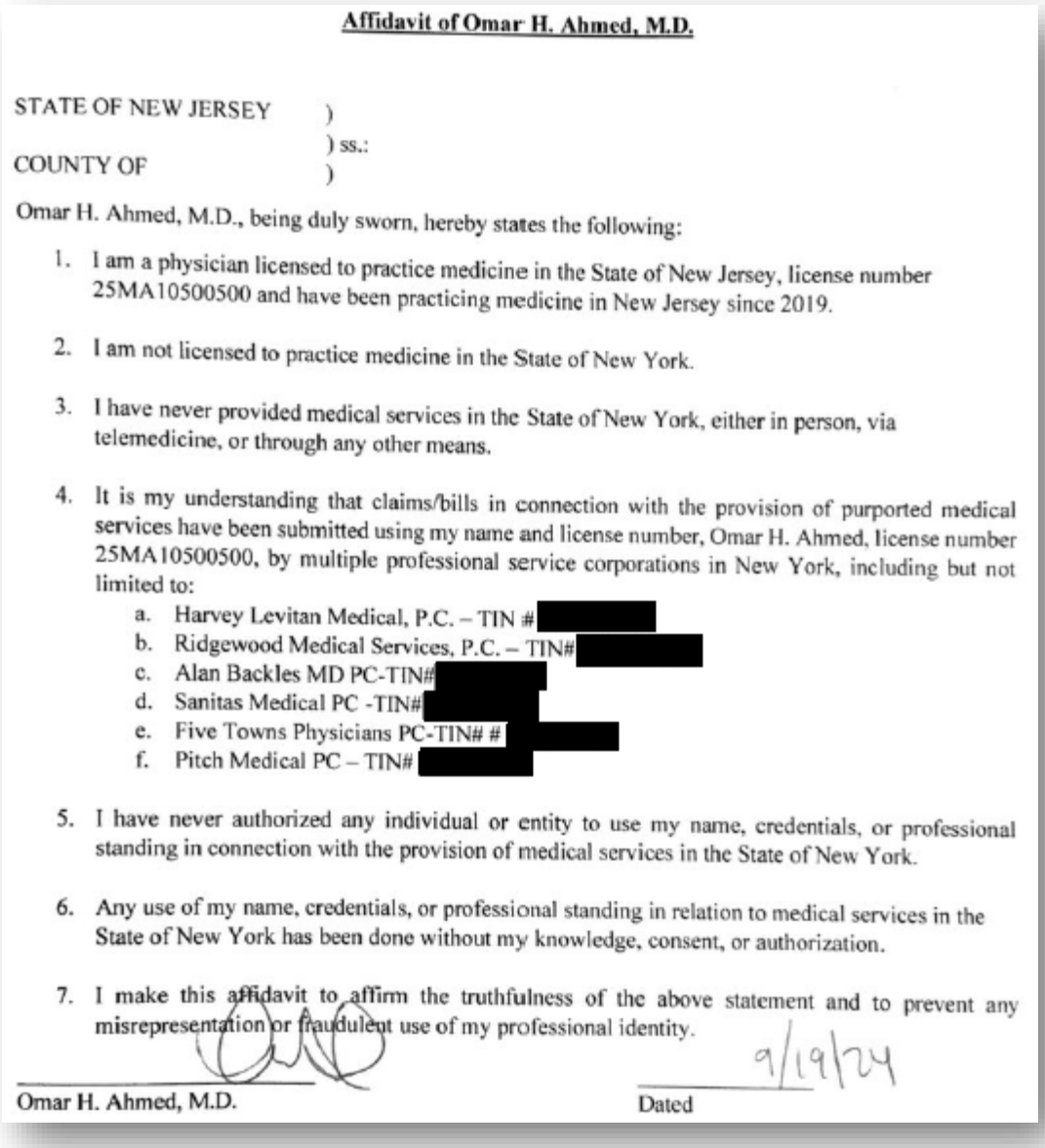
730. Omar H. Ahmed, M.D. is not licensed in New York.

731. Omar H. Ahmed, M.D. has never provided medical services in New York and never authorized his name, credentials, or professional standing to be used in the State of New York.

732. Travelers received false bills through the U.S. Mail for treatment purportedly provided by Omar H. Ahmed, M.D. through the Fictitious Billing PCs.

733. Omar H. Ahmed, M.D. testified under oath that he never submitted these bills to Travelers.

734. A true and accurate excerpt from the affidavit of Omar H. Ahmed, M.D. is depicted below:



Affidavit of Omar H. Ahmed, M.D.

STATE OF NEW JERSEY)
) ss.:
COUNTY OF)

Omar H. Ahmed, M.D., being duly sworn, hereby states the following:

1. I am a physician licensed to practice medicine in the State of New Jersey, license number 25MA10500500 and have been practicing medicine in New Jersey since 2019.

2. I am not licensed to practice medicine in the State of New York.

3. I have never provided medical services in the State of New York, either in person, via telemedicine, or through any other means.

4. It is my understanding that claims/bills in connection with the provision of purported medical services have been submitted using my name and license number, Omar H. Ahmed, license number 25MA10500500, by multiple professional service corporations in New York, including but not limited to:
   a. Harvey Levitan Medical, P.C. – TIN #
   b. Ridgewood Medical Services, P.C. – TIN#
   c. Alan Backles MD PC-TIN#
   d. Sanitas Medical PC -TIN#
   e. Five Towns Physicians PC-TIN# #
   f. Pitch Medical PC – TIN#

5. I have never authorized any individual or entity to use my name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

6. Any use of my name, credentials, or professional standing in relation to medical services in the State of New York has been done without my knowledge, consent, or authorization.

7. I make this affidavit to affirm the truthfulness of the above statement and to prevent any misrepresentation or fraudulent use of my professional identity.

Omar H. Ahmed, M.D.

9/19/24
Dated

735. The Fictitious Billing PCs and Ahmed created this false medical documentation and submitted same to Travelers through the U.S. Mail demanding payment.

736. In reasonable reliance on the veracity of the bills and records, Travelers made payments that were ultimately fundamental to the Defendants.

737. All such documents are fraudulent, including those identified in Exhibits 25-29.

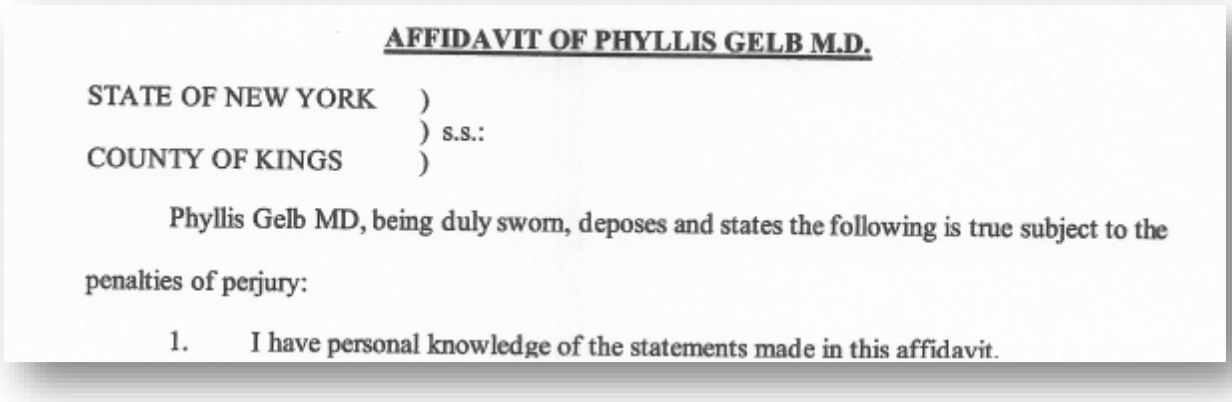
G. BILLING FOR SERVICES NOT RENDERED

738. The Defendants' scheme involved billing for services not actually rendered to Travelers claimants.

739. These services not rendered were then billed to Travelers for fraudulent reimbursement.

740. Gelb has admitted in an affidavit that she never actually treated patients through Town Medical and that a layperson was stamping Gelb's name onto medical documents.

741. A true and accurate excerpt of the Gelb affidavit is depicted below:



AFFIDAVIT OF PHYLLIS GELB M.D.

STATE OF NEW YORK)
) s.s.:
COUNTY OF KINGS)

Phyllis Gelb MD, being duly sworn, deposes and states the following is true subject to the penalties of perjury:

1. I have personal knowledge of the statements made in this affidavit.

***

5. This affidavit contains a summary of my knowledge pertaining to Avenue Medical Care, P.C. ("Avenue Medical"), Town Medical, P.C. ("Town Medical"), Melana Kay a/k/a Svetlana Kovaleva ("Ms. Kay"), and Omar Ahmed, M.D. ("Dr. Ahmed"). It is not intended to be an exhaustive account of my experience.

II. Dr. Ahmed and Town Medical

6. In or around December 2020 I received a call from Dr. Ahmed regarding an opportunity related to Town Medical and Avenue Medical (together, the "PCs"). My name was given to Dr. Ahmed by a former colleague and at the time he reached out to me I had never met him.

7. Shortly after receiving the initial call from Dr. Ahmed, I met with him in-person. At that meeting Dr. Ahmed advised that he wanted me to take over ownership of two PCs. Dr. Ahmed told me that he did not want the two PCs in his name because he already had too many medical practices under his own name.

***

11. I never actually treated patients through Town Medical. On the first day I was supposed to begin treating patients through Town Medical, I was injured and did not want to drive to any of Town Medical's offices to treat patients because of my injury. By the time I was able to return to Town Medical, the PC had closed.

12. I learned after Town Medical closed that the PC submitted a large volume of billing for what I understood to be shockwave therapy to the no-fault automobile insurance industry. I had no involvement in providing or billing for these services through Town Medical, and I did not refer any specific patients for the treatment.

***

14. After my initial meeting with Dr. Ahmed, I have come to understand that Ms. Kay is the person who was responsible for the day-to-day administrative operation of Avenue Medical.

15. Ms. Kay was responsible for, among other things, managing the administrative staff at Avenue Medical, scheduling Avenue Medical to operate at various no-fault locations, billing, receiving and depositing insurance company checks, and finding new no-fault office locations at which Avenue Medical could operate. She was also responsible for finding potential employees for me to interview and train.

***

17. During the time I was working at Avenue Medical, I provided Ms. Kay with a stamp of my signature. She was authorized to use it to stamp my signature on appropriate bills and checks. Neither she, nor anyone else, was authorized to use it for any other purpose outside of my presence.

***

20. Furthermore, during the time I owned Avenue Medical, I learned that someone at Avenue Medical was using my signature stamp on various medical records without my authorization. This may have created the impression that I was the treating provider when, in fact, I was not. I told Ms. Kay and the nurse practitioners not to use my stamp as the nurse practitioners were licensed and that they should be signing.

IV. Prescriptions in My Name

21. I also learned that my signature stamp was used on Avenue Medical treatment records, or certain prescriptions, when in fact I did not examine or treat the patients or authorize the prescriptions. For example, my signature stamp was used on examinations and prescriptions performed on and/or issued on dates of services on which I was not treating patients for Avenue Medical.

***

24. Any prescriptions or referrals in my name issued on dates on which I was not working at Avenue Medical were not issued or authorized by me.

***

39. I have never signed a referral for a patient for transcranial doppler testing in my clinical career at Avenue Medical. I never prepared, reviewed, or signed any letters of medical necessity or peer review rebuttal reports in support of any prescriptions for transcranial doppler testing at Avenue Medical. Any referrals for these services allegedly authorized by me either contain an unauthorized stamped signature or a forged signature.

40. I have never signed a referral for a patient for video nystamography in my clinical career at Avenue Medical. Nor have I ever prepared, reviewed, or signed any letters of medical necessity or peer review rebuttal reports in support of any prescriptions for video nystampography at Avenue Medical. Any referrals for these services allegedly authorized by me either contain an

unauthorized stamped signature or a forged signature.

41. I have never signed a referral for patient for extracorporeal shockwave therapy in my clinical career at Avenue Medical. I never prepared, reviewed, or signed any letters of medical necessity or peer review rebuttal reports in support of any prescriptions for extracorporeal shockwave therapy at Avenue Medical. Any referrals for these services allegedly authorized by me either contain an unauthorized stamped signature or a forged signature.

42. I have never signed a referral for patient for radial pressure wave therapy in my clinical career. Nor have I ever prepared, reviewed, or signed any letters of medical necessity or peer review rebuttal reports in support of any prescriptions for radial pressure wave therapy. Any referrals for these services allegedly authorized by me either contain an unauthorized stamped signature or a forged signature.

43. I have never signed a referral for any Avenue Medical patient for any healthcare services on a date that I was not working for Avenue Medical.

Phyllis Gelb MD

Sworn to before me this
7th day of May 2024

Notary Public

OMAR R. REHMAN
Notary Public, State of New York
No. 02RE6054331
Qualified in Kings County
Certificate Filed in New York County
Commission Expires ~~April 7, 20~~ June 25, 2027

742. Numerous Travelers claimants have testified under oath that they did not receive various treatment that was billed to Travelers.

743. The Defendants' scheme involved utilizing the PC Defendants to bill Travelers for worthless specialized testing, including: (1) TCD testing; (2) ESWT; (3) VNG testing; (4) EDX testing; (5) QSART testing; and (6) CVT testing.

1. Beckles MD PC

i. Claimant K.A. (Claim No. IIK9578)

744. Claimant K.A. (Claim No. IIK9578) testified under oath that he did not receive CVT testing.

745. A true and accurate excerpt of claimant K.A.'s testimony is depicted below:

Q. Okay. Did you ever have a test where somebody poured warm or cool water inside one or both of your ears?

A. Come back again, repeat that, please.

Q. Sure. Did you ever have a test, medical test, where somebody poured warm and or cool water into one or both ears?

A. No.

746. Claimant K.A. testified under oath that he did not receive VNG testing.

747. A true and accurate excerpt of claimant K.A.'s testimony is depicted below:

Q. Did you ever have a test where you had to wear goggles and you had to track lights?

A. No.

748. Despite these acknowledgements of testing not being performed, Beckles MD PC billed Travelers for CVT testing and VNG testing for claimant K.A.

749. Ahmed is the listed treating provider for the Beckles MD PC testing that was never performed on claimant K.A.

750. A true and accurate excerpt of billing for claimant K.A. submitted to Travelers by Beckles MD PC is depicted below:

PROVIDER'S NAME AND ADDRESS*
Alan Beckles MD
C/O Korsunskiy Legal Group. 1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537	$ 87.12
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	spontaneous nystagmus test including gaze and fixation nystagmus, with recording	1	92541	$ 106.71
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	positional nystagmus test, minimum of 4 positions, with recording	1	92542	$ 95.42
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	optokinetic nystagmus test, bidirectional foveal and peripheral stimulation with recording	1	92544	$ 58.01
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Oscillating tracking test, with recording	1	92545	$ 58.01
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Sinusoidal vertical axis rotational testing	1	92546-59	$ 91.77
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Sinusoidal vertical axis rotational testing	1	92546-59-76	$ 91.77
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547	$ 56.12
03/09/2022	175-20 Hillside Avenue, Jamaica, NY, 11432	Computerized dynamic posturography	1	92548	$ 187.19

TOTAL CHARGES TO DATE $ 832.12

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

751. Instead of using Ahmed's New York medical license on this bill, Ahmed, Beckles, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

752. This was done by Ahmed, Beckles, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

753. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

754. Ahmed, Beckles, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

755. Beckles MD PC fraudulently billed Travelers through the U.S. Mail for CVT testing and VNG testing for claimant K.A.

756. Travelers was billed through the U.S. Mail for CVT testing and VNG testing by Beckles MD PC for treatment purportedly performed by Ahmed on claimant K.A.

ii. Claimant O.A. (Claim No. IPB5496)

757. Claimant O.A. (Claim No. IPB5496) testified under oath that she did not receive TCD testing.

758. A true and accurate excerpt of claimant O.A.'s testimony is depicted below:

Q. The last thing, did you ever have any type of test that would involve them putting like sticky pads on your forehead, the back of your head and it would have touched your hair and made a mess? Have you had any type of test like that where they put electrodes on your head?

A. No, I don't recall that.

Q. Okay. So just to be clear, you never had to go home and clean out glue out of your hair or anything like that?

A. No.

759. Claimant O.A. testified under oath that she did not receive VNG testing.

760. A true and accurate excerpt of claimant O.A.'s testimony is depicted below:

Q. So now with these other tests that you might have had, did you ever have a test where you had to wear goggles or a helmet?

A. No.

761. Despite these acknowledgements of testing not being performed, Beckles MD PC billed Travelers for TCD testing and VNG testing for claimant O.A.

762. Ahmed is the listed treating provider for the Beckles MD PC testing that was never performed on claimant O.A.

763. A true and accurate excerpt of billing for claimant O.A. submitted to Travelers by Beckles MD PC is depicted below:

PROVIDER'S NAME AND ADDRESS*
Alan Beckles MD
C/O Korsunskiy Legal Group, 1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED – ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Transcranial Doppler study of the intracranial arteries ; complete study	1	93886	$ 507.34
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Transcranial Doppler study of the intracranial arteries ; vasoreactivity study	1	93890	$ 550.40
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Transcranial Doppler study of the intracranial arteries ;emboli detection without intravenous microbubble injection	1	93892-59	$ 584.05

TOTAL CHARGES TO DATE $ 1641.79

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

***

PROVIDER'S NAME AND ADDRESS*

Alan Beckles MD

C/O Korsunskiy Legal Group, 1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537	$ 87.12
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	spontaneous nystagmus test including gaze and fixation nystagmus, with recording	1	92541	$ 106.71
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	positional nystagmus test, minimum of 4 positions, with recording	1	92542	$ 95.42
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	optokinetic nystagmus test, bidirectional foveal and peripheral stimulation with recording	1	92544	$ 58.01
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Oscillating tracking test , with recording	1	92545	$ 58.01
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Sinusoidal vertical axis rotational testing	1	92546-59	$ 91.77
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Sinusoidal vertical axis rotational testing	1	92546-59-76	$ 91.77
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547	$ 56.12
03/28/2022	62-69 99TH STR, Rego Park, NY, 11374	Computerized dynamic posturography	1	92548	$ 187.19

TOTAL CHARGES TO DATE $ 832.12

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

764. Instead of using Ahmed's New York medical license on these bills, Ahmed, Beckles, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

765. This was done by Ahmed, Beckles, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

766. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

767. Ahmed, Beckles, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

768. Beckles MD PC fraudulently billed Travelers through the U.S. Mail for TCD testing and VNG testing for claimant O.A. that was purportedly performed by Ahmed.

769. Travelers was billed through the U.S. Mail for TCD testing and VNG testing by Beckles MD PC for treatment purportedly performed by Ahmed on claimant O.A.

2. Levitan Medical

i. Claimant K.V. (claim no. INQ7519)

770. Claimant K.V. (claim no. INQ7519) testified under oath that she did not receive VNG testing.

771. A true and accurate excerpt of claimant K.V.'s testimony is depicted below:

Q. Do you recall ever having any tests where somebody would put goggles on your head and you would hear -- excuse me -- you would see like flashing lights?
A. No.

772. Claimant K.V. testified under oath that she did not receive CVT testing.

773. A true and accurate excerpt of claimant K.V.'s testimony is depicted below:

Q. And did you ever have any tests at any time during your treatment where someone would put water in either of your ears, either hot water -- excuse me -- either warm water or cold water?
A. No.

***

Q. Would you remember if you had a test that involved putting water in your ears?

A. Putting water in my ear. I think I would remember.

Q. Have you had any tests that involved water in any of your ears to date?

A. No.

774. Despite these acknowledgements of testing not being performed, Levitan Medical billed Travelers for VNG testing and CVT testing for claimant K.V.

775. Ahmed is the listed treating provider for the Levitan Medical testing that was never performed on claimant K.V.

776. A true and accurate excerpt of billing for claimant K.V. submitted to Travelers by Levitan Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
H Levitan Medical PC
1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537-26	S 67.95
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Spontaneous nystagmus test, including gaze and fixation nystagmus, with recording	1	92541-26	S 85.37
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Positional nystagmus test, minimum of 4 positions with recording	1	92542-26	S 76.36
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Oscillating tracking test, with recording	1	92545-26	S 46.41
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Sinusoidal vertical axis rotational testing	1	92546-59-26	S 78.22
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Sinusoidal vertical axis rotational testing	1	92546-59-76-26	S 78.22
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547-26	S 44.90
12/21/2022	318 Seguine Ave, Staten Island,, NY, 10309	Computerized dynamic posturography	1	92548-26	S 44.93

TOTAL CHARGES TO DATE $ 522.36

16 IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

777. Instead of using Ahmed's New York medical license on this bill, Ahmed, Levitan, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

778. This was done by Ahmed, Levitan, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

779. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

780. Ahmed, Levitan, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

781. Levitan Medical fraudulently billed Travelers through the U.S. Mail for VNG testing and CVT testing for claimant K.V. that was purportedly performed by Ahmed.

782. Travelers was billed through the U.S. Mail for VNG testing and CVT testing by Levitan Medical for treatment purportedly performed by Ahmed on claimant K.V.

ii. Claimant V.E. (claim no. IPG5470)

783. Claimant V.E. (claim no. IPG5470) testified under oath that he did not receive CVT testing.

784. A true and accurate excerpt of claimant V.E.'s testimony is depicted below:

Q. Now, also, at the medical office, did you have any tests that involved them putting water in both of your ears?

A. No.

785. Despite these acknowledgements of testing not being performed, Levitan Medical billed Travelers for CVT testing for claimant V.E.

786. Ahmed is the listed treating provider for the Levitan Medical testing that was never performed on claimant V.E.

787. A true and accurate excerpt of billing for claimant V.E. submitted to Travelers by Levitan Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
H Levitan Medical PC
1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537-26	$ 67.95
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Spontaneous nystagmus test, including gaze and fixation nystagmus, with recording	1	92541-26	$ 85.37
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Positional nystagmus test, minimum of 4 positions with recording	1	92542-26	$ 76.36
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Oscillating tracking test, with recording	1	92545-26	$ 46.41
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Sinusoidal vertical axis rotational testing	1	92546-59-26	$ 78.22
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Sinusoidal vertical axis rotational testing	1	92546-59-76-26	$ 78.22
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547-26	$ 44.90
11/01/2022	430 W Merrick RD, Valley Stream, NY, 11580	Computerized dynamic posturography	1	92548-26	$ 44.93

TOTAL CHARGES TO DATE $ 522.36

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

788. Instead of using Ahmed's New York medical license on this bill, Ahmed, Levitan, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

789. This was done by Ahmed, Levitan, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

790. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

791. Ahmed, Levitan, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

792. Levitan Medical fraudulently billed Travelers through the U.S. Mail for CVT testing for claimant V.E. that was purportedly performed by Ahmed.

793. Travelers was billed through the U.S. Mail for CVT testing by Levitan Medical for treatment purportedly performed by Ahmed on claimant V.E.

iii. Claimant A.A. (claim no. IPG6682)

794. Claimant A.A. (claim no. IPG6682) testified under oath that she did not receive TCD testing.

795. A true and accurate excerpt of claimant A.A.'s testimony is depicted below:

Q No problem. As a result of this accident, do you ever remember a test where someone would have put gel on the temples of your head and on your eyelids and they would have rubbed a device across your forehead and your eyelids?

A No, no.

796. Claimant A.A. testified under oath that she did not receive CVT testing.

797. A true and accurate excerpt of claimant A.A.'s testimony is depicted below:

Q Okay. As a result of this accident, do you ever remember a test where someone shot water or air into either one of your ears?

A No.

798. Claimant A.A. testified under oath that she did not receive VNG testing.

799. A true and accurate excerpt of claimant A.A.'s testimony is depicted below:

Q As a result of this accident, do you remember receiving a test where someone

would have put a helmet over your head or goggles and you saw flashing lights?

A No.

800. Claimant A.A. testified under oath that she did not receive QSART testing.

801. A true and accurate excerpt of claimant A.A.'s testimony is depicted below:

Q Okay. Do you remember a test where someone would have collected your sweat at all?

A I don't remember anything like that. I don't recall that.

802. Despite these acknowledgements of testing not being performed, Levitan Medical billed Travelers through the U.S. Mail for TCD testing, CVT testing, VNG testing, and QSART testing for claimant A.A.

803. Ahmed is the listed treating provider for the TCD testing, CVT testing, and VNG testing that was never performed on claimant A.A.

804. A true and accurate excerpt of billing for claimant A.A. submitted to Travelers by Levitan Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
H Levitan Medical PC
1674 East 22 street, 2nd Floor, Brooklyn, NY. 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537-26	$ 67.95
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Spontaneous nystagmus test, including gaze and fixation nystagmus, with recording	1	92541-26	$ 85.37
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Positional nystagmus test, minimum of 4 positions with recording	1	92542-26	$ 76.36
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Oscillating tracking test, with recording	1	92545-26	$ 46.41
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Sinusoidal vertical axis rotational testing	1	92546-59-26	$ 78.22
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Sinusoidal vertical axis rotational testing	1	92546-59-76-26	$ 78.22
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547-26	$ 44.90
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Computerized dynamic posturography	1	92548-26	$ 44.93

TOTAL CHARGES TO DATE $ 522.36

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:					
TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

***

PROVIDER'S NAME AND ADDRESS*
H Levitan Medical PC
1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Transcranial Doppler study of the intracranial arteries ; complete study	1	93886-26	S 202.94
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Transcranial Doppler study of the intracranial arteries ; vasoreactivity study	1	93890-26	S 137.60
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Transcranial Doppler study of the intracranial arteries ;emboli detection without intravenous microbubble injection	1	93892-59-26	S 146.01

TOTAL CHARGES TO DATE $ 486.55

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:					
TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

805. Instead of using Ahmed's New York medical license on these bills, Ahmed, Levitan, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

806. This was done by Ahmed, Levitan, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

807. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

808. Ahmed, Levitan, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

809. Levitan is the listed treating provider for the QSART testing that was never performed on claimant A.A.

810. A true and accurate excerpt of billing for claimant A.A. submitted to Travelers by Levitan Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
H Levitan Medical PC
1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Testing of autonomic nervous system function; sudomotor, including 1 or more of the. following: quantitative sudomotor axon reflex test (QSART), silastic sweat imprint, thermoregulatory sweat test, and changes in sympathetic skin potential- Upper ext	1	95923 -26	$ 65.14
12/20/2022	9205 Rockaway Blvd, Jamaica, NY, 11417	Testing of autonomic nervous system function; sudomotor, including 1 or more of the. following: quantitative sudomotor axon reflex test (QSART), silastic sweat imprint, thermoregulatory sweat test, and changes in sympathetic skin potential- lower ext	1	95923 - 26	$ 65.14

TOTAL CHARGES TO DATE $ 130.28

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:					
TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Harvey Levitan	MD	Lic # 158639	No		

811. Levitan Medical fraudulently billed Travelers through the U.S. Mail for TCD testing, CVT testing, VNG testing, and QSART testing for claimant A.A. that was purportedly performed by Ahmed and/or Levitan.

812. Travelers was billed through the U.S. Mail for TCD testing, CVT testing, VNG testing, and QSART testing by Levitan Medical for treatment purportedly performed by Ahmed and/or Levitan on claimant A.A.

iv. Claimant D.D. (claim no. IWN1384)

813. Claimant D.D. (claim no. IWN1384) testified under oath that he did not receive TCD testing.

814. A true and accurate excerpt of claimant D.D.'s testimony is depicted below:

Q. Do you recall a test where you would have been laying down and they would have put the gel on the sides of your head or above your eyes or between your eyes and ears?

A. No.

815. Despite these acknowledgements of testing not being performed, Levitan Medical billed Travelers through the U.S. Mail for TCD testing for claimant D.D.

816. Ahmed is the listed treating provider for the TCD testing that was never performed on claimant D.D.

817. A true and accurate excerpt of billing for claimant D.D. submitted to Travelers by Levitan Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
Harvey Levitan Medical P.C.
2626 East 14th Street, Suite 201, Brooklyn, NY, 11235

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
05/24/2023	5506 Avenue N, Brooklyn, NY, 11229	Transcranial Doppler study of the intracranial arteries ; complete study	1	93886-26	$ 202.94
05/24/2023	5506 Avenue N, Brooklyn, NY, 11229	Transcranial Doppler study of the intracranial arteries ; vasoreactivity study	1	93890-26	$ 137.60
05/24/2023	5506 Avenue N, Brooklyn, NY, 11229	Transcranial Doppler study of the intracranial arteries ;emboli detection without intravenous microbubble injection	1	93892-59-26	$ 146.01

TOTAL CHARGES TO DATE $ 486.55

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

818. Instead of using Ahmed's New York medical license on this bill, Ahmed, Levitan, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

819. This was done by Ahmed, Levitan, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

820. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

821. Ahmed, Levitan, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

822. Levitan Medical fraudulently billed Travelers through the U.S. Mail for TCD testing for claimant D.D. that was purportedly performed by Ahmed.

823. Travelers was billed through the U.S. Mail for TCD testing by Levitan Medical for treatment purportedly performed by Ahmed on claimant D.D.

v. Claimant T.G. (claim no. IPG8301)

824. Claimant T.G. (claim no. IPG8301) testified under oath that he did not receive TCD testing.

825. A true and accurate excerpt of claimant T.G.'s testimony is depicted below:

Q. The next photo we're looking at is called a transcranial doppler study. It's an imaging study to look at the blood flow within the brain. They would do the imaging either on your temple, underneath your jaw line, on the back of the neck by the hairline or over your eyes.

Did you ever get a study like this done?

A. No.

826. Claimant T.G. testified under oath that he did not receive QSART testing.

827. A true and accurate excerpt of claimant T.G.'s testimony is depicted below:

Next test is something called QSART testing where they're measuring your sweat output.

Did you have any kind of problem with excessive sweating or heart rate?

A. No.

828. Claimant T.G. testified under oath that he did not receive CVT testing.

829. A true and accurate excerpt of claimant T.G.'s testimony is depicted below:

The next picture we're looking at is for caloric vestibular testing and what that is the person giving this test would pour warm and cool water into your ears.

Did you ever get a test like this done?

A. No.

830. Despite these acknowledgements of testing not being performed, Levitan Medical billed Travelers through the U.S. Mail for TCD testing, QSART testing, and CVT testing for claimant T.G.

831. Ahmed is the listed treating provider for the TCD testing and CVT testing that was never performed on claimant T.G.

832. A true and accurate excerpt of billing for claimant T.G. submitted to Travelers by Levitan Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
Harvey Levitan Medical P.C.
1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537-26	$ 67.95
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Spontaneous nystagmus test, including gaze and fixation nystagmus, with recording	1	92541-26	$ 85.37
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Positional nystagmus test, minimum of 4 positions with recording	1	92542-26	$ 76.36
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Oscillating tracking test, with recording	1	92545-26	$ 46.41
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Sinusoidal vertical axis rotational testing	1	92546-59-26	$ 78.22
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Sinusoidal vertical axis rotational testing	1	92546-59-76-26	$ 78.22
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547-26	$ 44.90
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Computerized dynamic posturography	1	92548-26	$ 44.93

TOTAL CHARGES TO DATE $ 522.36

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

***

PROVIDER'S NAME AND ADDRESS*

Harvey Levitan Medical P.C.

1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Transcranial Doppler study of the intracranial arteries ; complete study	1	93886-26	$ 202.94
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Transcranial Doppler study of the intracranial arteries ; vasoreactivity study	1	93890-26	$ 137.60
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Transcranial Doppler study of the intracranial arteries ;emboli detection without intravenous microbubble injection	1	93892-59-26	$ 146.01

TOTAL CHARGES TO DATE $ 486.55

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

833. Instead of using Ahmed's New York medical license on these bills, Ahmed, Levitan, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

834. This was done by Ahmed, Levitan, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

835. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

836. Ahmed, Levitan, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

837. Levitan is the listed treating provider for the QSART testing that was never performed on claimant T.G.

838. A true and accurate excerpt of billing for claimant T.G. submitted to Travelers by Levitan Medical is depicted below:

PROVIDER'S NAME AND ADDRESS*
Harvey Levitan Medical P.C.
1674 East 22 street, 2nd Floor, Brooklyn, NY, 11229

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Testing of autonomic nervous system function; sudomotor, including 1 or more of the following: quantitative sudomotor axon reflex test (QSART), silastic sweat imprint, thermoregulatory sweat test, and changes in sympathetic skin potential- lower ext	1	95923 - 26	S 65.14
02/16/2023	1 Cross Island Plaza, Rosedale, NY, 11422	Testing of autonomic nervous system function; sudomotor, including 1 or more of the following: quantitative sudomotor axon reflex test (QSART), silastic sweat imprint, thermoregulatory sweat test, and changes in sympathetic skin potential- Upper ext	1	95923 -26	S 65.14

TOTAL CHARGES TO DATE $ 130.28

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Harvey Levitan	MD	Lic # 158639	No		

839. Levitan Medical fraudulently billed Travelers through the U.S. Mail for TCD testing, QSART testing, and CVT testing for claimant T.G. that was purportedly performed by Ahmed and/or Levitan.

840. Travelers was billed through the U.S. Mail for TCD testing, QSART testing, and CVT testing by Levitan Medical for treatment purportedly performed by Ahmed and/or Levitan on claimant T.G.

3. Five Towns

i. Claimant A.S. (claim no. IWN6693)

841. Claimant A.S. (claim no. IWN6693) testified under oath that she did not receive TCD testing.

842. A true and accurate excerpt of claimant A.S.'s testimony is depicted below:

> Q Have you received what's called a transcranial doppler study? It's a test where gel is put near or close to your face or your head and they use a gel and use a device like a sonogram type device and attach to a computer so they can look into the arteries of your head?
>
> **A No.**

843. Claimant A.S. testified under oath that she did not receive VNG testing.

844. A true and accurate excerpt of claimant A.S.'s testimony is depicted below:

> Q Have you had, at Medical Solutions or anywhere related to this accident, a test where your eyes are tested?
>
> **A No.**

Q Have you had any eye tests related to this accident?

A No.

Q Have you had any eye test where goggles were placed on your eyes?

A No.

Q And they asked you to look at a moving light?

A No.

845. Despite these acknowledgements of testing not being performed, Five Towns billed Travelers for TCD testing and VNG testing for claimant A.S.

846. Ahmed is the listed treating provider for the TCD testing and VNG testing that was never performed on claimant A.S.

847. A true and accurate excerpt of billing for Five Towns that was submitted to Travelers is depicted below:

PROVIDER'S NAME AND ADDRESS*
Five Towns Physicians PC
2626 East 14th Street, Suite 201, Brooklyn, NY, 11235

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
01/24/2024	5000 Broadway, New York, NY, 10034	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537 - 26	$ 67.95
01/24/2024	5000 Broadway, New York, NY, 10034	Spontaneous nystagmus test, including gaze and fixation nystagmus, with recording	1	92541 - 26	$ 85.37
01/24/2024	5000 Broadway, New York, NY, 10034	Positional nystagmus test, minimum of 4 positions with recording	1	92542 - 26	$ 76.36
01/24/2024	5000 Broadway, New York, NY, 10034	Oscillating tracking test, with recording	1	92545 - 26	$ 46.41
01/24/2024	5000 Broadway, New York, NY, 10034	Sinusoidal vertical axis rotational testing	1	92546 - 59,26	$ 78.22
01/24/2024	5000 Broadway, New York, NY, 10034	Sinusoidal vertical axis rotational testing	1	92546 - 59,76,26	$ 78.22
01/24/2024	5000 Broadway, New York, NY, 10034	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547 - 26	$ 44.90
01/24/2024	5000 Broadway, New York, NY, 10034	Computerized dynamic posturograph	1	92548 - 26	$ 44.93

TOTAL CHARGES TO DATE $ 522.36

VERIFICATION OF TREATMENT BY ATTENDING PHYSICIAN OR OTHER PROVIDER OF HEALTH SERVICE
PAGE 3

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

***

PROVIDER'S NAME AND ADDRESS*
Five Towns Physicians PC
2626 East 14th Street, Suite 201, Brooklyn, NY, 11235

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
01/24/2024	5000 Broadway, New York, NY, 10034	Transcranial Doppler study of the intracranial arteries ; complete study	1	93886 - 26	$ 202.94
01/24/2024	5000 Broadway, New York, NY, 10034	Transcranial Doppler study of the intracranial arteries ; vasoreactivity study	1	93890 - 26	$ 137.60
01/24/2024	5000 Broadway, New York, NY, 10034	Transcranial Doppler study of the intracranial arteries ;emboli detection without intravenous microbubble injection	1	93892 - 59,26	$ 146.01

TOTAL CHARGES TO DATE $ 486.55

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

848. Instead of using Ahmed's New York medical license on these bills, Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

849. This was done by Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

850. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

851. Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

852. Five Towns fraudulently billed Travelers through the U.S. Mail for TCD testing and VNG testing for claimant A.S. that was purportedly performed by Ahmed.

853. Travelers was billed through the U.S. Mail for TCD testing and VNG testing by Five Towns for treatment purportedly performed by Ahmed on claimant A.S.

ii. Claimant D.B. (claim no. IWN6693)

854. Claimant D.B. (claim no. IWN6693) testified under oath that he did not receive TCD testing.

855. A true and accurate excerpt of claimant D.B.'s testimony is depicted below:

Have you received a transcranial doppler study?

A. Never, no.

Q. Do you know what that is?

A. No, I do not know what it is.

Q. A transcranial -- I'm sorry to interrupt, what was that?

A. No, that's okay. Go ahead.

Q. A transcranial doppler study, they use a device similar to what they use in the ultrasound, and they'll put a gel near your forehead or your head to look into the arteries in your head.

A. Mm-mm, no.

Q. No, okay. What I'm going to do just to make sure that we're both on the same page, I'm going to show a video of what transcranial doppler test is; okay?

A. Okay.

Q. Are you seeing my video?

A. Yes, sir. No, I never had that. No?

856. Claimant D.B. testified under oath that he did not receive CVT testing.

857. A true and accurate excerpt of claimant D.B.'s testimony is depicted below:

Q. Did you receive what's called caloric vestibular testing, now, do you know what that is?

A. No, I do not know.

Q. Okay. Let me put this, a caloric vestibular testing, what they do is they have you lay down face up and they'll insert warm water into one ear and cool water into the other ear.

A. Never.

858. Despite these acknowledgements of testing not being performed, Five Towns billed Travelers for TCD testing and CVT testing for claimant D.B.

859. Ahmed is the listed treating provider for the TCD testing and CVT testing that was never performed on claimant D.B.

860. A true and accurate excerpt of billing for Five Towns that was submitted to Travelers is depicted below:

PROVIDER'S NAME AND ADDRESS*
Five Towns Physicians PC
2626 East 14th Street, Suite 201, Brooklyn, NY, 11235

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
01/24/2024	5000 Broadway, New York, NY, 10034	Caloric vestibular test, with recording, bilateral; bithermal (i.e. one warm and one cool irrigation in each ear for a total of four irrigations	1	92537 - 26	$ 67.95
01/24/2024	5000 Broadway, New York, NY, 10034	Spontaneous nystagmus test, including gaze and fixation nystagmus, with recording	1	92541 - 26	$ 85.37
01/24/2024	5000 Broadway, New York, NY, 10034	Positional nystagmus test, minimum of 4 positions with recording	1	92542 - 26	$ 76.36
01/24/2024	5000 Broadway, New York, NY, 10034	Oscillating tracking test, with recording	1	92545 - 26	$ 46.41
01/24/2024	5000 Broadway, New York, NY, 10034	Sinusoidal vertical axis rotational testing	1	92546 - 59,26	$ 78.22
01/24/2024	5000 Broadway, New York, NY, 10034	Sinusoidal vertical axis rotational testing	1	92546 - 59,76,26	$ 78.22
01/24/2024	5000 Broadway, New York, NY, 10034	Use of vertical electrodes (List separately in addition to code for primary procedure)	1	92547 - 26	$ 44.90
01/24/2024	5000 Broadway, New York, NY, 10034	Computerized dynamic posturograph	1	92548 - 26	$ 44.93

TOTAL CHARGES TO DATE $ 522.36

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

861. Instead of using Ahmed's New York medical license on this bill, Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

862. This was done by Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

863. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

864. Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

865. Five Towns fraudulently billed Travelers through the U.S. Mail for TCD testing and CVT testing for claimant D.B. that was purportedly performed by Ahmed.

866. Travelers was billed through the U.S. Mail for TCD testing and CVT testing by Five Towns for treatment purportedly performed by Ahmed on claimant D.B.

iii. Claimant E.H. (claim no. IWN8473)

867. Claimant E.H. (claim no. IWN8473) testified under oath that she did not receive TCD testing.

868. A true and accurate excerpt of claimant E.H.'s testimony is depicted below:

Q Did you receive what is called a transcranial Doppler study?

A Not to my knowledge.

Q Do you know what a transcranial Doppler study is?

A No, I am not familiar with that.

Q In a transcranial Doppler study, what they

do is they use a scan or gel and a device, put it near your head, your forehead or your face to scan the arteries in your head.

A No.

Q Okay. Just to be clear, do you want to see a video of what it is or you did not receive it?

A I am quite sure I did not receive that.

869. Despite these acknowledgements of testing not being performed, Five Towns billed Travelers for TCD testing for claimant E.H.

870. Ahmed is the listed treating provider for the TCD testing that was never performed on claimant E.H.

871. A true and accurate excerpt of billing for Five Towns that was submitted to Travelers is depicted below:

PROVIDER'S NAME AND ADDRESS*
Five Towns Physicians PC
2626 East 14th Street, Suite 201, Brooklyn, NY, 11235

15. REPORT OF SERVICES RENDERED -- ATTACH ADDITIONAL SHEETS IF NECESSARY

Date of Service	Place of Service Including Zip Code	Description of Treatment or Health Service Rendered	Unit	Fee Schedule Treatment Code	Charges
03/26/2024	1894 Eastchester Rd, Bronx, NY, 10461	Transcranial Doppler study of the intracranial arteries ; complete study	1	93886 - 26	$ 202.94
03/26/2024	1894 Eastchester Rd, Bronx, NY, 10461	Transcranial Doppler study of the intracranial arteries ; vasoreactivity study	1	93890 - 26	$ 137.60
03/26/2024	1894 Eastchester Rd, Bronx, NY, 10461	Transcranial Doppler study of the intracranial arteries ;emboli detection without intravenous microbubble injection	1	93892 - 59,26	$ 146.01

TOTAL CHARGES TO DATE $ 486.55

16. IF TREATING PROVIDER IS DIFFERENT THAN BILLING PROVIDER COMPLETE THE FOLLOWING:

TREATING PROVIDER'S NAME	TITLE	LICENSE OR CERTIFICATION NO.	BUSINESS RELATIONSHIP CHECK APPLICABLE BOX		
			EMPLOYEE	INDEPENDENT CONTRACTOR	OTHER (SPECIFY)
Omar Ahmed	MD	Lic # 25MA10500500	Yes		

872. Instead of using Ahmed's New York medical license on this bill, Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators used the New Jersey license number (25MA10500500) for Omar H. Ahmed, M.D.

873. This was done by Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators to deceive Travelers into believing a different doctor had allegedly performed this treatment, causing Travelers to rely on the bill and submit payment.

874. Omar H. Ahmed, M.D. is not licensed in New York and never authorized the use of his name, credentials, or professional standing in connection with the provision of medical services in the State of New York.

875. Ahmed, V. Kremer, A. Kremer, and unknown layperson co-conspirators fraudulently used the medical license of Omar H. Ahmed, M.D.

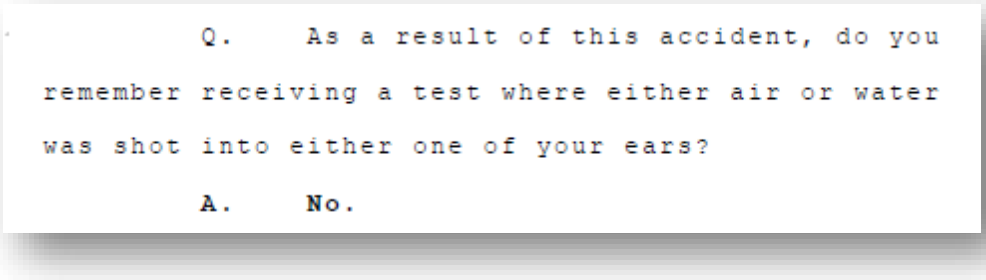
876. Five Towns fraudulently billed Travelers through the U.S. Mail for TCD testing for claimant E.H. that was purportedly performed by Ahmed.

877. Travelers was billed through the U.S. Mail for TCD testing by Five Towns for treatment purportedly performed by Ahmed on claimant E.H.

4. Pegasus Medical

878. Claimant L.H. (claim no. IPG8594) testified under oath that he did not receive CVT testing.

879. A true and accurate excerpt of claimant L.H.'s testimony is depicted below:



Q. As a result of this accident, do you remember receiving a test where either air or water was shot into either one of your ears?

A. No.

880. Despite this acknowledgement of testing of not being performed, Pegasus Medical billed Travelers through the U.S. Mail for CVT testing for claimant L.H.

881. Ahmed is the listed treating provider for the CVT testing that was never performed on claimant L.H.

882. A true and accurate excerpt of billing for Pegasus Medical that was submitted to Travelers is depicted below: