

30 Gardner Road #6A  
Brookline MA 02445

29 January 2013

**Attn: BORIM Complaints Cmte.**

Dear Dr Healy and Dr Felice,

Kind greetings once again!

The point I shall explain here is something I wished to bring immediately to your attention this afternoon but I wished to be 100% sure before doing so, even though I was 99.99% sure during the Hearing itself.

The statement by Atty. James Paikos this afternoon calling my care totally substandard, that I had misdiagnosed patients with MS and harmed them with MS drugs etc. seemed familiar not just because Cambridge Hospital's false charges were the same as before, but because his words were VERBATIM from a privileged Peer-Protected report unlawfully custom-ordered in August 2011 at significant expense by Cambridge Hospital from an outfit called The Greeley Company.

This report was custom-ordered by CHA as part of their effort to totally ERASE the report by the Hearing Panel that exonerated me in January 2011. CHA handed over documents carefully created by Dr Rachel Nardin and instructed The Greeley Company to explicitly make the same two points they have been trying to make for years now -

- 1 Dr Padmanabhan does not know anything about MS or MRIs or managing pain
- 2 Dr Padmanabhan is substandard and should have his license taken away forever

**This report addressed the EXACT same 10 patients on the list put up by Atty. Paikos.**

**This report was paid for by Cambridge Health Alliance, an entity under investigation for Fraud by both the FBI as well as the Inspector General at HHS.**

Atty. Paikos stated to the Committee today that an "Independent Expert" had opined that in 9 out of the 10 patients on the list selected by Dr Rachel Nardin, Dr Padmanabhan's care was substandard and had caused significant harm to the patients.

Atty. Paikos deliberately created the impression that the Board's own Complaint Counsel had hired this Independent Expert via the Board, using Board funds, in an honest, bona fide, good faith, independent investigation. **Atty. Paikos has deliberately committed a Fraud on the Board.**

contd. ->

This clearly proves the entirely corrupt nature of Atty. Paikos' attempt to relieve me of my License. **It is undeniably corrupt on the part of a publicly-paid attorney to represent the interests of a different entity while drawing a salary at the Board, especially when doing so blatantly aids and abets that entity's various felonies.** Even if I were not the victim of targeted retaliation in various unlawful manifestations, as a taxpayer alone I would be outraged at this corrupt action. **It is unlawful for Paikos to abuse the Board into serving as CHA's hired thugs.**

I strongly urge the Complaints Cmte. to ask Atty. Paikos the following, preferably under oath -

- 1 Who paid for this "Independent Expert" report?
- 2 When did the "Independent Expert" write the report?
- 3 Who gave Atty. Paikos this privileged Peer-Protected report?
- 4 Why did Atty. Paikos not declare the name of this "Independent Expert" at the Hearing today, especially given he was relying on this hitherto anonymous person's opinion to deprive Dr Padmanabhan of his License and livelihood?

As soon as I returned home today I compared Atty. Paikos' opening statement with the Greeley Report. Any program that looks for plagiarism would have immediately flagged the text! **This is proof that Atty. Paikos is acting as CHA's proxy in this unlawful retaliatory action.** There is no way he could have accessed the secret Greeley report from any other source! It also explains why he was totally unaware of any details about the patients on the list and mangled it so badly. As I see it, the text he read out has simply been handed to him by CHA.

It is likely he was told by CHA that I would be beaten down by this point, given that I have been living without any income for 2 full years now, while waiting for my Board of Medicine to dismiss the false charges and that I could be easily coerced into a plea agreement, especially without an attorney present. I see my patients entirely for free as I do not wish to recredential till my good name is restored. My reputation is more important to me than money. And I refuse to be coerced by people engaging in serious felonies, like Atty. Paikos.

With today's revelations atop all the data already with the Board, I think an outright dismissal of these false charges would be the best possible step to avoid rewarding the unlawful. I could then start earning a living again.

Thanking you and with respectful regards,

Yours sincerely,

**Bharani Padmanabhan MD PhD**  
*Board-Certified Double-Fellowship-trained MS Expert*



**External Peer Review  
Confidential  
Final Report**

*External Evaluation of  
Physician #3835  
For  
Cambridge Health Alliance  
Cambridge, MA*

**Prepared by:**

**The Greeley Company, a division of HCP Pro, Inc.  
75 Sylvan Street, Suite A-101  
Danvers, MA 01923  
July 15, 2011**

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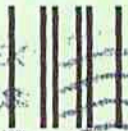
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