

**Lisa Siegel Belanger
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April 30, 2015

**BY FAX: (617)963-2236 &
Mail**

Chris Cecchini
Investigator
Medicaid Fraud Division
Office of the Attorney General
One Ashburton Place,
18th Floor
Boston, MA 02108

Re: By hand Notice on behalf of Medicaid Fraud Division delivered to the premises
of Dr. Bharani Padmanabhan (30 Gardner, Rd., Apt 6A, Brookline MA 02451)
Dated: April 29, 2015

Dear Investigator Cecchini:

As I informed you during our telephone conversation yesterday, on April 29, 2015—at
which time you were at the above-described premises of Dr. Padmanabhan, I am legal counsel
for Dr. Padmanabhan. To confirm, please be advised that any and all matters involving the
Attorney General’s Office with regard to my client, Dr. Padmanabhan are to be done *directly* and
exclusively through me as counsel. As shown, my contact information is provided in the
letterhead.

With regard to the above-referenced hand delivered letter, please be advised that the
Attorney General’s purported demand letter is patently invalid and unenforceable as:
1) Dr. Padmanabhan is not a “Medicaid provider” under the statutory provisions cited in your
letter; 2) Dr. Padmanabhan has not rendered any medical services under MassHealth; and
3) Dr. Padmanabhan has not received *any* money whatsoever for providing medical services.

De facto, Dr. Padmanabhan has not billed Medicare or Medicaid, in any manner, *whatsoever*. Dr. Padmanabhan has not received any public money for the past four (4) years. Therefore, the Attorney General's Office cannot possibly have even a scintilla of legitimate, genuine, good-faith basis to issue any demand for production of confidential protected health information upon my client—let alone to make a “24-hour” demand.

The Attorney General's letter of April 29, 2015 gives *not one iota* of information as to a supposed complaint of Medicare fraud. As set forth, your letter dated April 29, 2015—on behalf of the Attorney General—contains no valid legal basis or authority for the stated demands.

Accordingly, not only is my client under no obligation to produce any documents to you, *it would be a violation* of State and Federal law for my client to do as demanded by the Attorney General's Office.

Thank you for your attention in this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Lisa Siegel Belanger". The signature is written in a cursive style with a large initial "L".

Lisa Siegel Belanger

cc: Steven Hoffmann; Maura Healey