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ATTORNEY GENERAL
STATE OF FLORIDA

OFFICE OF THE ATTORNEY GENERAL
Medicaid Fraud Control Unit – Tallahassee
Complex Civil Enforcement Bureau

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March 10, 2016

Linda Baumann, Esq.
Arent Fox, Esq.
1717 K Street, NW
Washington, DC 20006

RE: North Broward Hospital District

Dear Ms. Baumann:


The Complex Civil Enforcement Bureau of the Florida Department of Legal Affairs, Medicaid Fraud Control Unit hereby demands payment from your client North Broward Hospital District in the amount of \$5,325,671.00. This settlement demand amount represents damages recoverable under the Florida False Claims Act.

This settlement demand amount is based upon North Broward Hospital District having entered into financial relationships with physicians that violated the Physician Self-Referral Law, 42 U.S.C. §§ 1395nn; the Florida Anti-Kickback Statute §456.054, Florida Statutes and the Florida False Claims Act, 68.081 *et seq.*, Florida Statutes. If this matter is not resolved through settlement, we may pursue Florida False Claims Act litigation in Leon County Circuit Court, seeking treble damages and civil penalties of not more than \$11,000 for each false claim submitted.

The physicians whose contracts Florida contends were improper and in violation of the Physician's Self Referral Law and the time periods during which they were in effect, are identified in the document attached hereto. North Broward Hospital District's submission of claims to the Florida Medicaid Program for services rendered to patients that were referred to North Broward Hospital District by the physicians identified in the attachment is in violation of the Florida False Claims Act.

Please contact me at your earliest convenience to discuss resolution of this matter in lieu of litigation.

Sincerely,


Jill Bennett
Assistant Attorney General

Enclosure

Attachment A

<u>Physician</u>	<u>Dates</u>
George Caldwell	1/1/09 - 5/31/14
Michael Chizner	4/1/00 - 5/31/14
Violeta McCormack	1/1/05 - 5/31/14
Hector Rodriguez-Cortes	6/1/08 - 5/31/14
Rudolph Roskos	3/1/10 - 5/31/14
John Rozanski	1/1/07 - 5/31/14
Ashok Sharma	1/1/06 - 5/31/14
Erol Yoldas	1/1/09 - 5/31/14
Shazia Zafar	8/1/08 - 5/31/14