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December 8, 2023

TO: Andrew Sheeran (General Counsel)
Agency for Health Care Administration (Affected Agency)
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CC: Kathryn Plemmons Inman (General Counsel)
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Michael Dobson (General Counsel)
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Re: F.S. 68.087(3) Original Source Disclosure (Voluntary Disclosure) (False Claims Act)

Client Name: Diana Parra, Dr. Christina Puig, Dr. Alejandra Sanchez, and Dr. Dayrys Tejeda General Counsel Sheeran,

We write you on behalf of our clients Diana Parra, Dr. Christina Puig, Dr. Alejandra Sanchez, and Dr. Dayrys Tejeda, who would like to make a Section 68.087(3) voluntary original source disclosure to the Office of the Attorney General and Department of Financial Services. Diana Parra graduated from Javeriana University. Ms. Parra was a billing specialist and inputted insurance claims to Medicaid contractors. Dr. Puig graduated from the Nova Southeastern University College of Dental Medicine. She completed pediatric dental residency at Nicklaus Children's Hospital in 2017. Dr. Tejada graduated from University of Medicine & Dentistry of New Jersey, n/k/a Rutgers School of Dental Medicine. She completed a pediatric dentistry residency at Lutheran Medical Center. Dr. Alejandra Sanchez graduated from the University of Louisville Dental School. Ms. Parra and Doctors Puig, Sanchez, and Tejeda worked for AC Pediatric Dentistry during 2020-2022.

AC Pediatric Dentistry utilized ACPDO Management, Inc., as a dental services organization. Dr. Ania Cabrerizo was the owner of AC Pediatric Dentistry until she was removed by ACPDO Management, Inc. Following the termination of Dr. Ania Cabrerizo, ACPDO Management, Inc. submitted reimbursement claims to Medicaid contractors using false credentials. In addition, ACPDO Management, Inc. began changing insurance claim billing codes of patients seen by Doctors Puig, Sanchez, and Tejeda without their authorization or knowledge. ACPDO Management, Inc. began limiting Doctors Puig, Sanchez, and Tejeda's access to the AC Pediatric Dentistry billing system so they could not review claims records. Ms. Parra utilized her knowledge of the AC Pediatric Dentistry billing system to assist Doctors Puig, Sanchez, and Tejeda uncover the false billing codes ACPDO Management, Inc. put on their patients' insurance claims. The changes made by ACPDO Management, Inc. to patients' insurance claim billing codes added dental services that were not provided or needed. ACPDO Management, Inc. then submitted these false claims to Medicaid contractors for reimbursement and were reimbursed for dental services that were not provided or needed. The Medicaid contractors include Liberty, Dentaquest, MCNA, and others.

Ms. Parra and Doctors Puig, Sanchez, and Tejeda brought their concerns about the incorrect billing codes to ACPDO Management, Inc. in May of 2022. They were told that ACPDO Management, Inc. would correct the incorrect billing codes. By November of 2022 the incorrect billing codes were not corrected. Ms. Parra and Doctors Puig, Sanchez, and Tejeda again brought their concerns to ACPDO Management, Inc., informing ACPDO Management, Inc. that the incorrect billing codes had not been corrected and the practice of changing billing codes changing insurance claim billing codes of patients seen by Doctors Puig Sanchez, and Tejeda continued. Additionally, ACPDO Management, Inc. proposed allowing items to be billed under their insurance numbers without their direct supervision. This proposal was flatly rejected. Ms. Parra and Doctors Puig, Sanchez, and Tejeda were terminated from their employment with AC Pediatric Dentistry in December 2022. Their termination letters were signed by a Jacksonville dentist, Dr. Howard Fetner. Dr. Fetner never set foot in AC Pediatric Dentistry. He never met Ms. Parra or Doctors Puig, Sanchez, and Tejeda nor had they had any contact with him prior to the termination notices. Ms. Parra and Doctors Puig, Sanchez, and Tejeda believe they were retaliated against for reporting the billing fraud, and not agreeing to participate in the improper billing practice proposed by ACPDO Management, Inc.

Sincerely,

/S/ William N. Spicola
William N. Spicola
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/S/ Adam J. Komisar
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