

DC

Final Order No. DOH-10-0268-~~FO~~<sup>L</sup>MQA  
FILED DATE - 2/15/2010  
Department of Health  
By: Angela Boston  
Deputy Agency Clerk

**STATE OF FLORIDA  
BOARD OF CHIROPRACTIC MEDIC**

**DEPARTMENT OF HEALTH,**

**Petitioner,**

**vs.**

**Case No.: 2006-18801  
License No.: CH 8603**

**CHRISTINA ELIZABETH LAPP, D.C.,**

**Respondent.**

\_\_\_\_\_ /

**FINAL ORDER**

THIS MATTER came before the Board of Chiropractic Medicine (hereinafter “the Board”) at a duly noticed public meeting on January 29, 2010, in Orlando, Florida. Pursuant to the Administrative Complaint, attached hereto as Exhibit A, it was alleged that Respondent violated specified sections of Chapter 460, Florida Statutes.

Petitioner was represented by Joanna Daniels, Assistant General Counsel, with the Department of Health. Respondent was neither present nor represented by counsel at the hearing.

Service of the Administrative Complaint was made upon Respondent by certified mail delivery, pursuant to Section 120.60(5), Florida Statutes. Respondent has not filed an Election of Rights or any other type of responsive pleading to the Administrative Complaint. Petitioner filed a Motion for Determination of Waiver and Entry of Final Order Following Hearing and a Motion to Assess Costs. Respondent has not filed a responsive pleading to either motion.

The prosecuting attorney offered the investigative file into evidence to prove the facts as alleged in the Administrative Complaint and for the purposes of determining penalty. The

investigative file was received into evidence and the Board finds that the uncontested facts adequately support the allegations. After a complete review of the record in this matter, including consideration of the Administrative Complaint, any written evidence or testimony, and any mitigating or aggravating circumstances, the Board makes the following findings and conclusions:

### **FINDINGS OF FACT**

1. The allegations of fact set forth in the Administrative Complaint are approved, adopted, and incorporated herein by reference as the findings of fact by the Board.
2. There is competent, substantial evidence to support the Board's findings and conclusions.
3. The Board finds that Respondent failed to timely respond to the Administrative Complaint and waived her right to elect a method of resolution in this matter.

### **CONCLUSIONS OF LAW**

1. Petitioner's Motion for Determination of Waiver and Entry of Final Order Following Hearing Not Involving Disputed Issues of Material Fact is **granted**.
2. The conclusions of law alleged and set forth in the Administrative Complaint are approved and adopted and incorporated herein by reference as the conclusions of law of the Board.
3. The violations set forth in the Administrative Complaint warrant disciplinary action by the Board.
4. Based upon the Findings of Fact, the Board concludes that the licensee violated Section 460.413(1)(c) and/or Section 456.072(1)(c), Florida Statutes, by being found guilty of a

crime directly related to the practice or the ability to practice chiropractic medicine; Section 460.413(1)(k) and/or Section 456.072(1)(m), Florida Statutes, by making deceptive, untrue or fraudulent representations in the practice of chiropractic medicine; and Section 456.072(1)(x), Florida Statutes, by failing to report a criminal conviction to the Board within 30 days of the conviction.

5. The Board is empowered by Section 460.413(2) and/or 456.072(2), Florida Statutes, to impose a penalty against Respondent.

**THEREFORE IT IS ORDERED AND ADJUDGED, that:**

1. **SUSPENSION.** Respondent's license to practice chiropractic medicine in the State of Florida shall be **indefinitely suspended**. The suspension shall remain in force until Respondent is able to demonstrate to the Board that she is capable of safely engaging in the practice of chiropractic medicine.

2. **PRN EVALUATION.** In order to lift the license suspension, Respondent shall submit a petition for reinstatement to the Board. Prior to the submission of the petition for reinstatement, Respondent shall undergo an evaluation coordinated through the Professionals Resource Network (PRN). Respondent shall comply with any and all recommendations of PRN. Respondent shall not submit a petition for reinstatement until such time as PRN is willing to advocate that Respondent is capable to practice chiropractic medicine with skill and safety.

3. **RETENTION OF JURISDICTION.** The Board expressly retains jurisdiction to impose any additional conditions or restrictions upon Respondent's license to practice chiropractic medicine at the time that the license suspension is lifted.

4. **FINE.** The Board shall impose a fine in the amount of **twenty thousand dollars**

**(\$20,000.00).** The fine shall be paid by certified or cashier's check or money order within **five (5) years** of the filing date of this Final Order.

**RULING ON MOTION TO ASSESS COSTS**

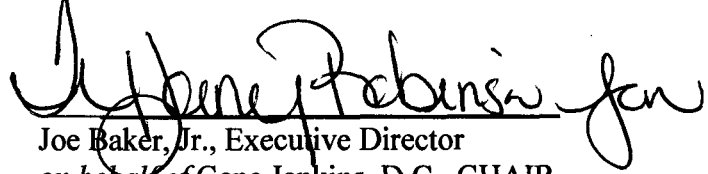
The Board reviewed Petitioner's Motion to Assess Costs, grants the Motion, and imposes the costs associated with the investigation and prosecution of this case in the amount of **eight thousand five hundred seventy-one dollars and sixty-four cents (\$8,571.64)** to be paid by certified or cashier's check or money order within **five (5) years** of the filing date of this Final Order.

Payment of the fine and costs shall be made to the Board of Chiropractic Medicine and mailed to: DOH-Compliance Management Unit, P.O. Box 6320, Tallahassee, Florida 32314-6320, Attention: Chiropractic Compliance Officer.

This order shall become effective upon filing with the Clerk of the Department of Health.

**DONE AND ORDERED** this 12<sup>th</sup> day of February, 2010.

**BOARD OF CHIROPRACTIC MEDICINE**

  
Joe Baker, Jr., Executive Director  
on behalf of Gene Jenkins, D.C., CHAIR

**NOTICE OF RIGHT TO JUDICIAL REVIEW**

A PARTY WHO IS ADVERSELY AFFECTED BY THIS FINAL ORDER IS ENTITLED TO JUDICIAL REVIEW PURSUANT TO SECTION 120.68, FLORIDA STATUTES. REVIEW PROCEEDINGS ARE GOVERNED BY THE FLORIDA RULES OF APPELLATE PROCEDURE. SUCH PROCEEDINGS ARE COMMENCED BY FILING ONE COPY OF A NOTICE OF APPEAL WITH THE AGENCY CLERK OF THE DEPARTMENT OF HEALTH AND A SECOND COPY, ACCOMPANIED BY FILING FEES PRESCRIBED BY LAW, WITH THE DISTRICT COURT OF APPEAL, FIRST DISTRICT, OR WITH THE DISTRICT COURT OF APPEAL IN THE FLORIDA APPELLATE DISTRICT WHERE THE PARTY RESIDES. THE NOTICE OF APPEAL MUST BE FILED WITHIN THIRTY (30) DAYS OF THE FILING DATE OF THE ORDER TO BE REVIEWED.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by certified U.S. Mail to: **Christina Lapp, D.C**, Inmate #78073-004, Federal Detention Center, Post Office Box 1731, Waseca, MN 56093 and 1275 Crystal Way, Unit F, Delray Beach, Florida 33444; and by interoffice mail to **Deborah B. Loucks**, Assistant Attorney General, Office of the Attorney General, PL-01, The Capitol, Tallahassee, Florida 32399-1050; and **Joanna Daniels**, Assistant General Counsel, Department of Health, 4052 Bald Cypress Way, Bin #C-65, Tallahassee, Florida 32399-3265, on February 15, 2010.

Angela Barton

7004 0750 0004 3692 4720

U.S. Postal Service <b>CERTIFIED MAIL</b> (Domestic Mail Only; No Ins)	For del. Very Information visit <a href="http://usps.com">usps.com</a>	<b>OFFICE</b>
Certified Fee \$ 0.88	Return Receipt Fee (Endorser's Receipt Required)	Postage \$ 2.00
Receipt (Delivery) Fee (Endorser's Receipt Required)	Total Package Charges \$ 2.88	Post Office Waseca, MN
Sent To Mrs. Christina Lapp	Street, Apt. No., or P.O. Box No. City, State, ZIP+4	

P.S. Form 3800 June 2007

## Causey, Sherra

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**From:** Baker, Joe Jr  
**Sent:** Wednesday, February 10, 2010 12:59 PM  
**To:** CH; clp; Deby; DL MQA Board of Chiropractic/Optomery/Med Physicist/Podiatry/O&P/Clinical Lab/NHA; DL MQA Management Team; George, Rebekah; Kirkland, Stephanie; LAG; nha; nha-ag; o&p; opt; pod; Robison, Helaine; Sanders, Sylvia (MQA); Slocum, Cassandra; Smith, Eulinda; Tim  
**Subject:** Delegation of Authority

During my absence on Thursday, February 11, 2010, and Friday, February 12, 2010, Tiffany Robinson (Regulatory Supervisor) is delegated authority for the board office. She can be reached at 245-4394.

I will be at meetings with the Board of Optometry in Jacksonville. Thx.

 Get into a Green Routine. Please consider the environment before printing this e-mail.

*Joe Baker, Jr.*

### Board Executive Director

Florida Boards of Chiropractic Medicine, Clinical Laboratory Personnel, Nursing Home Administrators, Optometry, Orthotists & Prosthetists, and Podiatric Medicine

- Florida Department of Health\*Division of Medical Quality Assurance\*Bureau of Health Care Practitioner Regulation
- 850.245.4355 (board office switchboard); 850.922.8876 [board office fax]
- 850.245.4393 (direct line)
- [www.FLHealthSource.com](http://www.FLHealthSource.com); [joejr\\_baker@doh.state.fl.us](mailto:joejr_baker@doh.state.fl.us)

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**Mission:** *Promote, protect and improve the health of all people in Florida.*

**Vision:** *A healthier future for the people of Florida.*

**Purpose:** *To protect the public through health care licensure, enforcement and information.*

**Focus:** *To be the nation's leader in quality health care regulation.*

**Values:** *Integrity, Commitment, Respect, Excellence, Accountability, Teamwork, & Empowerment*

### Customer Satisfaction Survey

How am I communicating? Please contact my manager

**Please note:** Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

**STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BOARD OF CHIROPRACTIC MEDICINE**

DEPARTMENT OF HEALTH,

CASE NO. 2006-18801

PETITIONER,

v.

CHRISTINA ELIZABETH LAPP, D.C.

RESPONDENT.

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**MOTION FOR DETERMINATION OF WAIVER AND ENTRY OF FINAL  
ORDER FOLLOWING HEARING**

COMES NOW, Petitioner, Department of Health, by and through its undersigned counsel and moves the Board of Chiropractic Medicine to find Respondent has waived the right to elect a method of disposition of the pending administrative complaint, to determine that no material facts are in dispute, to conduct a hearing not involving disputed issues of material fact, and to enter a Final Order thereafter. As grounds therefore, Petitioner states:

1. An Administrative Complaint was filed against Respondent on September 23, 2009. A copy of said Administrative Complaint is attached hereto as Petitioner's **Exhibit A**.

2. On or before September 28, 2009, the Department served the Respondent via certified mail return receipt requested at both her address of record and known actual address. The return receipts are attached as **Composite Exhibit B**. The Respondent acknowledged receiving the

Administrative Complaint in her letter dated October 16, 2009 which is attached as **Exhibit C**.

3. Respondent has not filed with either the Department of Health or the Board of Chiropractic Medicine an Election of Rights form or other responsive pleading in this case within the twenty-one day period to dispute the allegations of fact contained in the Administrative Complaint. A copy of affidavits supporting same is attached hereto as Petitioner's **Exhibits D and E**.

4. Respondent has been advised by this motion that a copy of the investigative file in this case shall be furnished to the Board to establish a prima facie case regarding the violations set forth in the Administrative Complaint.

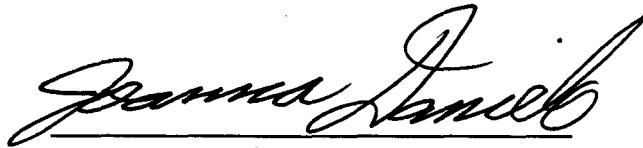
5. The Department has determined that there are no material facts in dispute and Respondent has waived the right to elect the method of resolution.

6. The Department requests that this Motion and hearing be placed on the Agenda of the January 29, 2010 meeting of the Board of Chiropractic Medicine, to be held on in Orlando, Florida.

WHEREFORE, Petitioner respectfully requests the Board find that Respondent has waived the right to elect a method of resolution of this matter, find that there are no material facts in dispute, hold a hearing not

involving material issues of disputed fact based on the information contained in the investigative file, find that Respondent violated Chapters 460, Florida Statutes, as alleged in the Administrative Complaint, impose discipline in accordance with the disciplinary guidelines, and enter a Final Order.

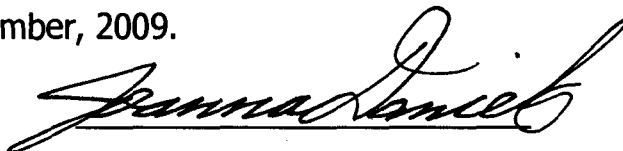
Respectfully submitted,



Joanna Daniels  
Assistant General Counsel  
Florida Bar Number # 118321  
Department of Health  
Prosecution Services Unit  
4052 Bald Cypress Way, Bin # C-65  
Tallahassee, Florida 32399-3265  
(850) 245-4640; Fax (850) 245-4684

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Determination of Waiver and Entry of Final Order Following Hearing has been furnished via US Mail to Christina E. Lapp, D. C. Inmate #78073-004 to the FCI Waseca, Federal Correction Institution, P.O. Box 1731, Waseca, Minnesota 56093 and 1275 Crystal Way Unit P, Delray Beach, FL 33441, this 22<sup>ND</sup> day of December, 2009.



JOANNA DANIELS  
Assistant General Counsel

STATE OF FLORIDA  
DEPARTMENT OF HEALTH

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CHRISTINA ELIZABETH LAPP, D.C.

RESPONDENT.

CASE NO. 2006-18801

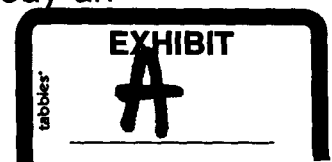
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**Administrative Complaint**

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Petitioner, Department of Health, by and through its undersigned counsel, files this Administrative Complaint before the Board of Chiropractic Medicine against Respondent, CHRISTINA ELIZABETH LAPP, D.C. In support Petitioner alleges:

- 1) Petitioner is the state department charged with regulating the practice of Chiropractic Medicine pursuant to Section 20.43, Florida Statutes; Chapter 456, Florida Statutes; and Chapter 460, Florida Statutes.
- 2) At all times material to this Complaint, Respondent was a chiropractic physician within the State of Florida, having been issued license number CH 8603 on or about June 27, 2003.
- 3) Respondent's address of record is 1275 Crystal Way, Unit P, Delray Beach, Florida 33444, but as of Tuesday, September 22, 2009, the Federal Bureau of Prisons reports that the Respondent is in custody an



may receive mail at: CHRISTINA ELIZABETH LAPP, Inmate Number 78073-004 FDC Miami, Federal Detention Center, P.O. Box 019120, Miami, Florida 33101.

### **Regulatory Framework**

- 4) The "Health Care Clinic Act," Florida Statutes 400.991-400.995, required all health care clinics to file an application for license or exemption with the Agency for Health Care Administration ("AHCA"). The required information on the application included information regarding each person who, directly or indirectly, owned or controlled five (5) percent or more of an interest in the clinic, or general partners in limited liability partnerships.
- 5) Florida Statute 400.9905 provided that the licensure requirements of the health care clinics did not apply to a sole proprietorship, group practice, partnership, or corporation that provided health care services by licensed health care practitioners which were wholly owned by a licensed health care practitioner, or the licensed health care practitioner and the spouse, parent, or child of a licensed health care practitioner, so long as one of the owners who was a licensed health care practitioner was supervising the services performed therein and

was legally responsible for the entity's compliance with all federal and state laws.

- 6) On or about August 23, 2004, the Respondent completed and signed an "Application For Certificate Of Exemption From Licensure As A Health Care Clinic," AHCA Form 0301104.
- 7) When completing the required narrative for AHCA Form 0301104, the Respondent wrote, "My clinic is fully owned by myself." Elsewhere in the form, Respondent indicated she had one hundred percent (100%) ownership.
- 8) On or about September 3, 2004, the Respondent submitted or caused to be submitted to AHCA the AHCA Form 0301104 that she completed and signed.
- 9) At the time the Respondent submitted or caused to be submitted to AHCA the AHCA Form 0301104 that she completed and signed, the Respondent realized that Mike Williams Tosca Martinez had also been an owner and operator of Broward Care Chiropractic Center.
- 10) On or about September 20, 2004, AHCA approved the Respondent's "Application For Certificate Of Exemption From Licensure As A Health Care Clinic".

11) Pursuant to Section 400.9935(4), Florida Statutes (2003)-(2004), all charges or reimbursement claims made by or on behalf of a clinic that was required to be licensed but was not so licensed, or was otherwise operating in violation of the Florida Statute, were unlawful charges and, therefore, were noncompensable charges.

12) On or about April 23, 2009, the United States Attorney filed an information against Respondent in Case Number 0:09-CR-60114WPD, in the District Court for the Southern District of Florida.

13) Count one the information charged the Respondent as follows:

On or about August 23, 2004, in Broward County, in the Southern District of Florida, and elsewhere, the defendant, CHRISTINA LAPP, did knowingly and willfully attempt to prevent, obstruct, mislead and delay the communication of information and records relating to a Federal health care offense to a criminal investigator, in that the defendant submitted documentation stating that she was the sole owner of the Broward Care Medical Center and Broward Chiropractic Center, when the defendant knew the same to be untrue; in violation of Title 18, United States Code, Section 1518.

14) Count two of the information charged the Respondent as follows:

On or about August 23, 2004, in Broward County, in the Southern District of Florida, and elsewhere, the defendant, CHRISTINA LAPP, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make false, fraudulent and fictitious statements and

representations as to material facts, in that she represented to a federal criminal investigator that she was the sole owner of the Broward Care Medical Center and Broward Chiropractic Center; in violation of Title 18, United States Code Section 1001(1)(a)(2).

15) On or about May 14, 2009, the Respondent pled guilty to Counts 1 and 2 of the information.

16) As indicated in the "Factual Proffer in Support of Plea Agreement" that the Respondent signed on or about May 14, 2009, during the time that the Respondent and Martinez were associated with Broward Care Medical Center and Broward Care Chiropractic Center, approximately seventy percent (70%) of their insurance claims were fraudulent. The Factual Proffer further states that the seventy percent of the claims equaled five hundred thirty-seven thousand three hundred fifty dollars (\$537,350).

17) Pursuant to Section 400.9935(5), Florida Statutes (2003)-(2004), any person who knowingly files a false or misleading license application or license renewal application, or false or misleading information related to such application or department rule, commits a felony of the third degree, punishable as provided in Sections 775.082, 775.083, or 775.084, Florida Statutes.

- 18) On or about August 12, 2009, the United States District Court for the Southern District of Florida, adjudicated Respondent guilty as to both counts of the information.
- 19) Respondent was sentenced to a prison term of one (1) year and one (1) day, and three (3) years of supervised release for each count contained in the information to run concurrently.
- 20) The crimes to which Respondent pled guilty are both felonies.
- 21) Respondent's conviction for violating Title 18, United States Code, Section 1518, represents a crime that is directly related to the practice or to the ability to practice chiropractic medicine. In addition, Respondent's conviction for violating Title 18, United States Code, Section 1518, represents a crime that relates to the practice of, or the ability to practice chiropractic medicine, the Respondent's profession.
- 22) Respondent's conviction for violating Title 18, United States Code Section 1001(1)(a)(2), represents a crime that is directly related to the practice or to the ability to practice chiropractic medicine. In addition, Respondent's conviction for violating Title 18, United States Code Section 1001(1)(a)(2), represents a crime that relates to the practice of, or the ability to practice chiropractic medicine, the Respondent's profession.

23) As of September 14, 2009, there is no record that the Respondent has reported to the Board in writing her August 12, 2009 conviction.

### **Count One**

24) Petitioner re-alleges paragraphs one (1) through twenty-three (23) as though fully alleged herein.

25) Section 460.413(1)(c), Florida Statutes (2008)-(2009), subjects a licensee to discipline for being convicted or found guilty, regardless of adjudication, of a crime in any jurisdiction which directly relates to the practice of chiropractic medicine or to the ability to practice chiropractic medicine.

26) Section 456.072(1)(c), Florida Statutes, (2008)-(2009), subjects a licensee to discipline for being convicted or found guilty of, or entering a plea of guilty or nolo contendere to, regardless of adjudication, a crime in any jurisdiction which relates to the practice of, or the ability to practice, a licensee's profession.

27) Respondent was found guilty of crimes directly related to the practice or the ability to practice chiropractic medicine through one or more of the following:

a) when she was found guilty of violating Title 18, United States Code, Section 1518, based upon Respondent telling a criminal

investigator that she was the sole owner of Broward Care Medical Center and Broward Chiropractic Center, when the Respondent knew the same to be untrue;

b) when she was found guilty of violating Title 18, United States Code Section 1001(1)(a)(2), based upon her representations to a federal criminal investigator that she was the sole owner of the Broward Care Medical Center and Broward Chiropractic Center, when in truth and in fact, and as she then and there well knew, she was not the sole owner of Broward Care Medical Center and Broward Chiropractic Center.

28) Based on the foregoing, Respondent has violated Section 460.413(1)(c) and/or 456.072(1)(c) Florida Statutes (2008)–(2009).

### **Count Two**

29) Petitioner re-alleges paragraphs one (1) through twenty-three (23) as though fully alleged herein.

30) Section 460.413(1)(k), Florida Statutes, (2003)-(2009) subjects a licensee to discipline for making misleading, deceptive, untrue, or fraudulent representations in the practice of chiropractic medicine or employing a trick or scheme in the practice of chiropractic medicine

when such trick or scheme fails to conform to the generally prevailing standards of treatment in the chiropractic medical community.

31) Section 456.072(1)(m), Florida Statutes (2003)-(2009) subjects a licensee to discipline for making deceptive, untrue, or fraudulent representations in or related to the practice of a profession or employing a trick or scheme in or related to the practice of a profession regulated by the Department.

32) Respondent made a misleading, deceptive, untrue, or fraudulent representation in one or more of the following ways:

a) by indicating that Respondent was a one hundred percent (100%) owner of Broward Care Medical Center when in fact she was not;

or

b) by indicating that Respondent was a one hundred percent (100%) owner of Broward Chiropractic Center when in fact she was not;

or

c) by submitting or causing to be submitted for payment one or more fraudulent insurance claims; or

d) by submitting or causing to be submitted for payment charges or reimbursement claims that pursuant to Section 400.9935(4),

Florida Statutes (2003)-(2004), were unlawful charges and, therefore, were noncompensable charges.

33) Based on the foregoing, Respondent has violated Section 456.072(1)(m) and/or Section 460.413(1)(k), Florida Statutes (2005)-(2009).

### **Count Three**

34) Petitioner re-alleges paragraphs one (1) through twenty-three (23) as though fully alleged herein.

35) Section 456.072(1)(x), Florida Statutes (2009), provides that failing to report to the Board, or the Department if there is no board, in writing within thirty (30) days after the licensee has been convicted or found guilty of, or entered a plea of nolo contendere to, regardless of adjudication, a crime in any jurisdiction constitutes grounds for disciplinary action by the Board of Chiropractic Medicine.

36) Respondent failed to report her conviction entered on or about August 12, 2009, to the Board of Chiropractic Medicine in writing within thirty (30) days.

37) Based on the foregoing, Respondent has violated Section 456.072(1)(x), Florida Statutes (2009), by failing to report to the Board, or the Department if there is no board, in writing within thirty

(30) days after the licensee has been convicted or found guilty of, or entered a plea of nolo contendere to, regardless of adjudication.

**WHEREFORE**, the Petitioner respectfully requests that the Board of Chiropractic Medicine enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

**SIGNED** this 22<sup>ND</sup> day of SEPTEMBER, 2009.

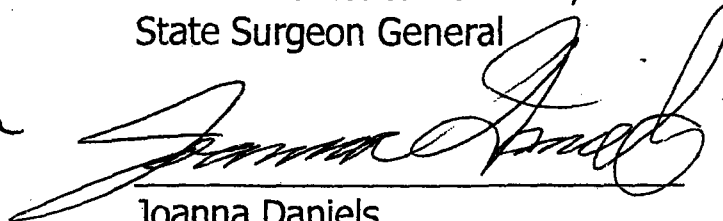
**FILED**

DEPARTMENT OF HEALTH  
DEPUTY CLERK

CLERK: Angele Barton

DATE 9/23/09

Ana M. Viamonte Ros M.D., MPH  
State Surgeon General



Joanna Daniels  
Assistant General Counsel  
DOH Prosecution Services Unit  
4052 Bald Cypress Way, Bin C-65  
Tallahassee, FL 32399-3265  
Florida Bar # 118321  
(850) 245-4640 ext 8242  
(850) 246-4684 FAX

PCP: ROD JONES, D.C & WAYNE WOLFSON, D.C.

PCP Date: TUESDAY, SEPTEMBER 22, 2009

## **NOTICE OF RIGHTS**

**Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested.**

## **NOTICE REGARDING ASSESSMENT OF COSTS**

**Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition to any other discipline imposed.**

7160 3901 9848 3561 5725  
 Christina Lapp, #78073-004  
 Federal Detention Center  
 P.O. Box 019120  
 Miami, Florida 33101  
 09/23/2009 06-18801

JD/tm

**SENDER:**

**REFERENCE:**  
 AC Pack

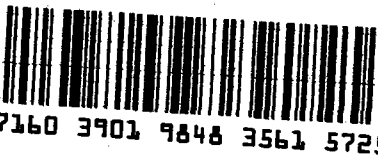
PS Form 3800, January 2005

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

US Postal Service  
**Receipt for  
 Certified Mail**

POSTMARK OR DATE

2. Article Number



3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee)  Yes

1. Article Addressed to:

Christina E. Lapp, Inmate #78073-004  
 FDC Miami, Federal Detention Center  
 P.O. Box 019120  
 Miami, FL 33101

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

D. Is delivery address different from item 1?  
 IF YES, enter delivery address below:

- Agent
- Addressee
- Yes
- No

SEP 28 2009  
 11:59 AM  
 LEGAL  
 REGULATIONS  
 SECTION 1 - 1-18801


Comp. EXHIBIT  
**B**  
 PAGE 1 of 2

06-18801

Daniels

ALL 62A - AC Pack

LAPP  
FILE

2. Article Number		COMPLETE THIS SECTION ON DELIVERY	
 7160 3901 9848 3561 5718		A. Received by (Please Print Clearly) MARY West-Allen	B. Date of Delivery
3. Service Type CERTIFIED MAIL		C. Signature X Mary West-Allen	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes		D. Is delivery address different from item 1? If YES, enter delivery address below: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
1. Article		334443007 1509 67 09/27/09	
LAPP275		NOTIFY SENDER OF NEW ADDRESS	
LAPP CHRISTINA E		2009 OCT 12 AM 9:18	
S50W22640 PARTRIDGE LN		LEGAL	
WAUKESHA WI 53189-9740		MAILING CENTER NEULAN	
PS Form 3811, January 2005		Domestic Return Receipt	

*Handwritten signature*

Comp. EXHIBIT  
tabbles  
**B**  
PAGE 2 OF 2

Case No. 2006-18801

10-16-09

PRACTITIONER REGULATION  
LEGAL

READ/OK/OK  
10-16-09  
(A. H. H. H.)

Dear Joanna Daniels, 2009 OCT 22 AM 10:11

I'm sorry for the delay in this letter. I have reviewed the Administrative Complaint. I do not have legal counsel at this time due to insufficient funds available as well as the Federal B.O.P. system, which has been moving me around from Miami, to Oklahoma to Minnesota. I moved out of the state of Florida 6-1-09 with no intentions to ever practice Chiropractic in the State of Florida again. I am interested in voluntarily relinquishing my license asap. I had been waiting for my sentencing on 8-12-09 to contact the DOH about the situation. Prosecutor Harry Wallace informed me personally that the DOH was fully aware of the case and had not determined what actions would be taken at that time. Both the prosecutor, my attorney at that time, as well as myself, were extremely surprised that the judge did not let me self surrender like we had hoped. Therefore I was unable to tend to my personal and professional affairs prior to my sentencing. I do have a friend, legal counsel, reviewing the complaint at this time, however I wanted to inform you of my decision to relinquish

EXHIBIT


C

(2)

my license voluntarily. I also wanted to personally apologize for my actions. I made a poor choice in agreeing to place my name and professional license as the sole-owner for a facility that I simply worked at. I was in just as much shock as everyone to hear that my employers were bringing in business fraudulently. At the time I found out, I chose to walk away and was afraid to report what I knew. My life took a downward turn at this time and within one year I admitted myself to rehab. I have recently moved back to Wisconsin to be with my friends and family and to continue working on my recovery. I am very limited here in Prison as far as communication with the normal society. Please send all correspondence to the following:

Christina Happ Reg# ~~78073-004~~ 78073-004  
Federal Correctional Institution Unit D  
P.O. Box 1731  
Wauseca, MN 56093

Sincerely,

Christina Happ 

Name Christina Lapp Reg # 73073-004  
Federal Correctional Institution Unit D  
P.O. Box 1731  
Waseca, MN 56093

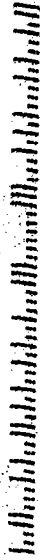


MANKATO MN 560

19 OCT 2009 PM 1 L

Joanna Daniels, Assistant General Counsel  
DOH, Prosecution Services Unit  
4052 Bald Cypress Way, Bin # C65  
Tallahassee, FL 32399-3265

32399+7017





Charlie Crist  
Governor

Ana M. Viamonte Ros, M.D., M.P.H.  
State Surgeon General

**AFFIDAVIT**

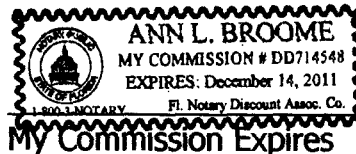
I, **Joe Baker**, hereby certify in my official capacity as Executive Director for Board of Chiropractic Medicine, hereby certify in my official capacity as custodian of the records for **Christina E. Lapp, D.C. Case #2006-18801** that the Board has not received an Election of Rights form or other responsive pleading which requests a hearing prior to any Department action which would affect the Subject's substantial interests or rights.

Joe Baker, Executive Director  
Board of Chiropractic Medicine

Before me, personally appeared Joe Baker Sr., whose identity is personally known to me by and who, under oath, acknowledges that ~~her~~ signature appears above. his

Sworn to and subscribed before me this 14 day of Dec, 2009.

Ann L Broome  
NOTARY PUBLIC





Charlie Crist  
Governor

Ana M. Viamonte Ros, M.D., M.P.H.  
State Surgeon General

**AFFIDAVIT**

I, Angela Barton, Deputy Clerk for the Department Clerk's Office, hereby certify in my official capacity as custodian for the Department Clerk's records, that the Department Clerk's Office has not received an Election of Rights form or other responsive pleading, which requests a hearing prior to any Department action regarding **Christina E. Lapp, D.C., Case # 2006-18801** which would affect the Respondent's substantial interests or rights.

Angela Barton  
Custodian of Record  
Department Clerk's Office

Before me, personally appeared Angela Barton, whose identity is known to me by personally known (type of identification) and who, under oath, acknowledges that his/her signature appears above.

Sworn to and subscribed before me this 14 day of December, 2009.

Renada Conley  
Notary Public

My Commission Expires:



STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BOARD OF CHIROPRACTIC MEDICINE

DEPARTMENT OF HEALTH,

Petitioner,

Case Number: 2006-18801

vs.

CHRISTINA ELIZABETH LAPP, D.C.

Respondent.

**MOTION TO ASSESS COSTS**  
**IN ACCORDANCE WITH SECTION 456.072(4)**

COMES NOW the Department of Health, by and through undersigned counsel, and moves the Board of Chiropractic Medicine ("Board") for the entry of a Final Order assessing costs against the Respondent for the investigation and prosecution of this case in accordance with Section 456.072(4), Florida Statutes (2009). As grounds therefore, the Petitioner states the following:

1. At its next regularly scheduled meeting, the Board will take up for consideration the above-styled disciplinary action and will enter a Final Order therein.

2. Section 456.072(4), Florida Statutes (2009),<sup>1</sup> states as follows:

In addition to any other discipline imposed through final order, or citation, entered on or after July 1, 2001, pursuant

<sup>1</sup> Ch. 2003-416, § 19, Laws of Fla., effective September 15, 2003, amended Section 456.072(4), Florida Statutes (2003), to include the underlined language.

to this section or discipline imposed through final order, or citation, entered on or after July 1, 2001, for a violation of any practice act, the board, or the department when there is not board, shall assess costs related to the investigation and prosecution of the case. Such costs related to the investigation and prosecution include, but are not limited to, salaries and benefits of personnel, costs related to the time spent by the attorney and other personnel working on the case, and any other expenses incurred by the department for the case. The board, or the department when there is no board, shall determine the amount of costs to be assessed after its consideration of an affidavit of itemized costs and any written objections thereto. . . .

3. The investigation and prosecution of this case has resulted in costs in the total amount of **eight thousand five hundred seventy one dollars and sixty four cents (\$8,571.64)**, based on the following itemized statement of costs:

Complaint:	\$	66.87
Investigation:	\$	2,110.56
Legal:	\$	6,394.21
Compliance:	\$	0

Therefore, the Petitioner seeks an assessment of costs against the Respondent in the amount of **eight thousand five hundred seventy one dollars and sixty four cents (\$8,571.64)**, as evidenced in the attached affidavit. (**Exhibit A**).

4. Should the Respondent file written objections to the assessment of costs, within ten (10) days of the date of this motion, specifying the grounds for the objections and the specific elements of the costs to which the objections are made, the Petitioner requests that the Board determine the amount of costs to be assessed based

upon its consideration of the affidavit attached as **Exhibit A** and any timely-filed written objections.

5. Petitioner requests that the Board grant this motion and assess costs in the amount of **eight thousand five hundred seventy one dollars and sixty four cents (\$8,571.64)**, as supported by competent, substantial evidence. This assessment of costs is in addition to any other discipline imposed by the Board and is in accordance with Section 456.072(4), Florida Statutes (2009).

WHEREFORE, the Department of Health requests that the Board enter a Final Order assessing costs against the Respondent in the amount of **eight thousand five hundred seventy one dollars and sixty four cents (\$8,571.64)**.

DATED this 22<sup>ND</sup> day of DECEMBER, 2009.

Respectfully submitted,



Joanna Daniels  
Assistant General Counsel  
Florida Bar Number #118321  
Department of Health  
Prosecution Services Unit  
4052 Bald Cypress Way, Bin # C-65  
Tallahassee, Florida 32399-3265  
(850) 245-4640  
(850) 245-4684 FAX

***CERTIFICATE OF SERVICE***

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion has been provided to: Christina E. Lapp, D.C., Inmate #78073-004, FCI Waseca, Federal Correctional Institution Unit D., P.O. Box 1731, Waseca, MN 56093 and 1275 Crystal Way Unit P, Delray Beach, FL 33444 U.S. Mail on this 22<sup>ND</sup> day of December 2009.



Joanna Daniels  
Assistant General Counsel

**AFFIDAVIT OF FEES AND COSTS EXPENDED**



STATE OF FLORIDA  
COUNTY OF LEON:

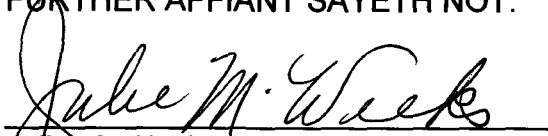
**BEFORE ME**, the undersigned authority, personally appeared **JULIE M. WEEKS** who was sworn and states as follows:

- 1) My name is Julie M. Weeks.
- 2) I am over the age of 18, competent to testify, and make this affidavit upon my own personal knowledge and after review of the records at the Florida Department of Health (DOH).
- 3) I am the Operations and Management Consultant Manager (OMCM) for the Consumer Services and Compliance Management Unit for DOH. The Consumer Services Unit is where all complaints against Florida health care licensees (e.g., medical doctors, dentists, nurses, respiratory therapists) are officially filed. I have been in my current job position for more than one year. My business address is 4052 Bald Cypress Way, Bin C-75 Tallahassee, Florida 32399-3275.
- 4) As OMCM of the Consumer Services and Compliance Management Unit, my job duties include reviewing data in the Time Tracking System and verifying that the amounts correspond. The Time Tracking System is a computer program which records and tracks DOH's costs regarding the investigation and prosecution of cases against Florida health care licensees.
- 5) As of today, DOH's total costs for investigating and prosecuting DOH case number(s) **2006-18801** Department of Health v **(Christina Elizabeth Lapp, D.C.)** are **EIGHT THOUSAND FIVE HUNDRED SEVENTY-ONE DOLLARS AND SIXTY-FOUR CENTS (\$8,571.64)**
- 6) The costs for DOH case numbers **2006-18801** (Department of Health v. **Christina E. Lapp, D.C.**) are summarized in Exhibit 1 (Cost Summary Report), which is attached to this document.
- 7) The itemized costs and expenses for DOH case numbers **2006-18801** (Department of Health v. **Christian E. Lapp, D.C.**) are detailed in Exhibit 2 (Itemized Cost Report and Itemized Expense Report and receipts), which is attached to this document.
- 8) The itemized costs as reflected in Exhibit 2 are determined by the following method: DOH employees who work on cases daily are to keep track of their time in six-minute increments (e.g., investigators

and lawyers). A designated DOH employee in the Consumer Services Unit, Legal Department, and in each area office, inputs the time worked and expenses spent into the Time Tracking System. Time and expenses are charged against a state health care Board (e.g., Florida Board of Medicine, Florida Board of Dentistry, Florida Board of Osteopathic Medicine), and/or a case. If no Board or case can be charged, then the time and expenses are charged as administrative time. The hourly rate of each employee is calculated by formulas established by the Department. (See the Itemized Cost Report)

- 9) Julie M. Weeks, first being duly sworn, states that she has read the foregoing Affidavit and its attachments and the statements contained therein are true and correct to the best of her knowledge and belief.

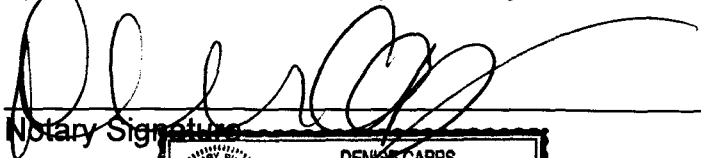
FURTHER AFFIANT SAYETH NOT.



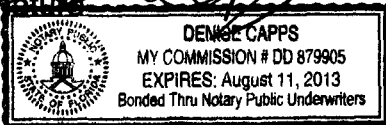
Julie M. Weeks, Affiant

State of Florida  
County of Leon

Sworn to and subscribed before me this 15<sup>th</sup> day of DEC, 2009,  
by Julie M. Weeks, who is personally known to me.



Notary Signature



Name of Notary Printed

Stamp Commissioned Name of Notary Public:

## Complaint Cost Summary

Complaint Number: 200618801

Complainant's Name: DOH/BOARD OF CHIROPRACTIC MEDICINE

Subject's Name: LAPP, CHRISTINA ELIZABETH

	***** Cost to Date *****	
	Hours	Costs
<b>Complaint:</b>	1.20	\$66.87
<b>Investigation:</b>	33.50	\$2,110.56
<b>Legal:</b>	55.50	\$6,394.21
<b>Compliance:</b>	0.00	\$0.00
	*****	*****
<b>Sub Total:</b>	90.20	\$8,571.64
<b>Expenses to Date:</b>		\$0.00
<b>Prior Amount:</b>		\$0.00
<b>Total Costs to Date:</b>		\$8,571.64



**Time Tracking System  
Itemized Cost by Complaint**

Complaint 200618801

Report Date 12/11/2009

Staff Code	Activity Hours	Staff Rate	Cost	Activity Date	Activity Code	Activity Description
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**CONSUMER SERVICES UNIT**

HA22	0.30	\$49.74	\$14.92	06/22/2006	25	REVIEW CASE FILE
HA22	0.60	\$49.74	\$29.84	06/23/2006	78	INITIAL REVIEW AND ANALYSIS OF COMPLAINT
HA22	0.30	\$73.69	\$22.11	09/14/2009	25	REVIEW CASE FILE
<b>Sub Total</b>	<b>1.20</b>		<b>\$66.87</b>			

**INVESTIGATIVE SERVICES UNIT**

MI156	1.50	\$57.18	\$85.77	07/05/2006	4	ROUTINE INVESTIGATIVE WORK
MI156	1.00	\$57.18	\$57.18	07/20/2006	4	ROUTINE INVESTIGATIVE WORK
MI156	1.00	\$57.18	\$57.18	08/10/2006	4	ROUTINE INVESTIGATIVE WORK
MI156	1.00	\$57.18	\$57.18	08/11/2006	4	ROUTINE INVESTIGATIVE WORK
MI156	2.00	\$57.18	\$114.36	09/11/2006	4	ROUTINE INVESTIGATIVE WORK
MI156	1.50	\$57.18	\$85.77	09/18/2006	4	ROUTINE INVESTIGATIVE WORK
MI156	1.50	\$57.18	\$85.77	09/19/2006	4	ROUTINE INVESTIGATIVE WORK
MI156	1.50	\$57.18	\$85.77	09/19/2006	58	ROUTINE INVESTIGATIVE WORK
MI156	1.00	\$57.18	\$57.18	09/20/2006	4	TRAVEL TIME
MI167	0.50	\$71.55	\$35.78	04/24/2007	6	ROUTINE INVESTIGATIVE WORK
MI170	2.00	\$66.12	\$132.24	05/03/2007	4	SUPPLEMENTAL INVESTIGATION
MI170	2.00	\$66.12	\$132.24	05/04/2007	4	ROUTINE INVESTIGATIVE WORK
MI170	2.50	\$66.12	\$165.30	05/15/2007	4	ROUTINE INVESTIGATIVE WORK
MI170	2.50	\$66.12	\$165.30	05/16/2007	4	ROUTINE INVESTIGATIVE WORK
MI171	1.50	\$68.05	\$102.08	05/16/2007	4	ROUTINE INVESTIGATIVE WORK
MI170	2.00	\$66.12	\$132.24	05/22/2007	4	ROUTINE INVESTIGATIVE WORK
MI170	1.00	\$66.12	\$66.12	05/23/2007	4	ROUTINE INVESTIGATIVE WORK
MI154	1.50	\$73.49	\$110.24	05/24/2007	2	OFFICE SUPERVISORY DUTIES
MI170	1.50	\$66.12	\$99.18	05/29/2007	4	ROUTINE INVESTIGATIVE WORK
LI75	0.50	\$63.04	\$31.52	06/22/2009	6	SUPPLEMENTAL INVESTIGATION
LI75	1.50	\$63.04	\$94.56	07/01/2009	6	SUPPLEMENTAL INVESTIGATION
LI75	0.50	\$63.04	\$31.52	07/14/2009	6	SUPPLEMENTAL INVESTIGATION



**Time Tracking System  
Itemized Cost by Complaint**

Complaint 200618801

Report Date 12/11/2009

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Staff Code	Activity Hours	Staff Rate	Cost	Activity Date	Activity Code	Activity Description
L175	0.50	\$63.04	\$31.52	07/14/2009	58	TRAVEL TIME
L175	1.50	\$63.04	\$94.56	07/15/2009	6	SUPPLEMENTAL INVESTIGATION
<b>Sub Total</b>	<b>33.50</b>		<b>\$2,110.56</b>			
<b>PROSECUTION SERVICES UNIT</b>						
HLL36B	1.80	\$123.94	\$223.09	10/04/2006	46	LEGAL RESEARCH
HLL36B	1.40	\$123.94	\$173.52	10/09/2006	28	PREPARE OR REVISE ADMINISTRATIVE COMPLAINT
HLL36B	0.50	\$123.94	\$61.97	10/09/2006	35	TELEPHONE CALLS
HLL36B	0.80	\$123.94	\$99.15	10/12/2006	46	LEGAL RESEARCH
HLL36B	3.50	\$123.94	\$433.79	10/12/2006	31	PREPARE OR REVISE CLOSING ORDER
HLL49B	0.50	\$126.00	\$63.00	11/22/2006	89	PROBABLE CAUSE PREPARATION
HLL36B	0.80	\$123.94	\$99.15	12/04/2006	6	SUPPLEMENTAL INVESTIGATION
HLL52A	0.70	\$122.85	\$86.00	06/19/2007	25	REVIEW CASE FILE
HLL52A	1.00	\$122.85	\$122.85	06/19/2007	46	LEGAL RESEARCH
HLL52A	0.50	\$122.85	\$61.43	06/19/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL53A	0.40	\$123.32	\$49.33	06/20/2007	25	REVIEW CASE FILE
HLL53A	0.20	\$123.32	\$24.66	06/20/2007	32	REVIEW CLOSING ORDER
HLL36B	0.30	\$123.94	\$37.18	06/26/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL53A	0.50	\$123.32	\$61.66	06/29/2007	46	LEGAL RESEARCH
HLL53A	0.40	\$123.32	\$49.33	07/02/2007	99	PREPARATION AND FOLLOW THROUGH OF CASES FOR EXPERT REVIEW
HLL53A	0.20	\$123.32	\$24.66	07/03/2007	99	PREPARATION AND FOLLOW THROUGH OF CASES FOR EXPERT REVIEW
HLL53A	0.30	\$123.32	\$37.00	07/03/2007	99	PREPARATION AND FOLLOW THROUGH OF CASES FOR EXPERT REVIEW
HLL53A	0.10	\$123.32	\$12.33	07/05/2007	35	TELEPHONE CALLS
HLL53A	0.10	\$123.32	\$12.33	07/05/2007	35	TELEPHONE CALLS
HLL53A	0.30	\$123.32	\$37.00	08/07/2007	64	LEGAL ADVICE/DISCUSSION - BOARD OFFICE, DEPT STAFF OR ATTY GEN OFF.
HLL53A	0.70	\$123.32	\$86.32	08/09/2007	99	PREPARATION AND FOLLOW THROUGH OF CASES FOR EXPERT REVIEW
HLL53A	0.30	\$123.32	\$37.00	08/09/2007	64	LEGAL ADVICE/DISCUSSION - BOARD OFFICE, DEPT STAFF OR ATTY GEN OFF.
HLL53A	0.50	\$123.32	\$61.66	08/10/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL36B	0.70	\$123.94	\$86.76	08/14/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL53A	0.20	\$104.39	\$20.88	08/15/2007	64	LEGAL ADVICE/DISCUSSION - BOARD OFFICE, DEPT STAFF OR ATTY GEN OFF.
HLL53A	0.50	\$104.39	\$52.20	08/15/2007	31	PREPARE OR REVISE CLOSING ORDER

**Time Tracking System  
Itemized Cost by Complaint**

Complaint 200618801

Report Date 12/11/2009

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Staff Code	Activity Hours	Staff Rate	Cost	Activity Date	Activity Code	Activity Description
HLL36B	0.40	\$123.94	\$49.58	08/16/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL53A	0.50	\$104.39	\$52.20	08/17/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL53A	0.30	\$104.39	\$31.32	08/20/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL36B	0.40	\$123.94	\$49.58	08/20/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL53A	0.30	\$123.32	\$37.00	08/21/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL53A	0.20	\$104.39	\$20.88	09/27/2007	60	MISCELLANEOUS
HLL53A	0.50	\$91.00	\$45.50	10/12/2007	31	PREPARE OR REVISE CLOSING ORDER
HLL62A	2.50	\$111.56	\$278.90	03/31/2008	60	MISCELLANEOUS
HLL36B	1.10	\$111.56	\$122.72	03/31/2008	46	LEGAL RESEARCH
HLL36B	0.40	\$111.56	\$44.62	03/31/2008	28	PREPARE OR REVISE ADMINISTRATIVE COMPLAINT
HLL62A	0.40	\$111.56	\$44.62	06/23/2008	25	REVIEW CASE FILE
HLL62A	0.40	\$111.56	\$44.62	06/23/2008	35	TELEPHONE CALLS
HLL62A	3.20	\$111.56	\$356.99	06/23/2008	6	SUPPLEMENTAL INVESTIGATION
HLL62A	0.40	\$111.56	\$44.62	06/23/2008	26	PREPARE OR REVISE MEMORANDUM
HLL53A	0.20	\$111.56	\$22.31	06/23/2008	60	MISCELLANEOUS
HLL62A	0.30	\$111.56	\$33.47	06/24/2008	70	CONFERENCES WITH LAWYERS
HLL62A	0.30	\$111.56	\$33.47	06/24/2008	35	TELEPHONE CALLS
HLL22B	0.20	\$111.56	\$22.31	06/24/2008	27	REVIEW MEMORANDUM
HLL53A	0.40	\$111.56	\$44.62	06/24/2008	70	CONFERENCES WITH LAWYERS
HLL62A	0.10	\$111.56	\$11.16	06/25/2008	27	REVIEW MEMORANDUM
HLL62A	0.30	\$111.56	\$33.47	06/30/2008	35	TELEPHONE CALLS
HLL62A	0.20	\$111.56	\$22.31	06/30/2008	6	SUPPLEMENTAL INVESTIGATION
HLL62A	0.20	\$111.56	\$22.31	07/03/2008	37	REVIEW LETTER
HLL62A	0.20	\$111.56	\$22.31	07/08/2008	6	SUPPLEMENTAL INVESTIGATION
HLL62A	0.40	\$111.56	\$44.62	07/18/2008	6	SUPPLEMENTAL INVESTIGATION
HLL62A	0.20	\$111.56	\$22.31	07/18/2008	36	PREPARATION OR REVISION OF LETTER
HLL62A	0.10	\$111.56	\$11.16	08/08/2008	25	REVIEW CASE FILE
HLL62A	0.10	\$111.56	\$11.16	09/08/2008	35	TELEPHONE CALLS
HLL62A	0.20	\$111.56	\$22.31	10/06/2008	25	REVIEW CASE FILE
HLL62A	0.50	\$111.56	\$55.78	12/08/2008	25	REVIEW CASE FILE
HLL62A	0.30	\$111.56	\$33.47	01/09/2009	70	CONFERENCES WITH LAWYERS
HLL62A	0.50	\$111.56	\$55.78	01/09/2009	26	PREPARE OR REVISE MEMORANDUM
HLL62A	0.40	\$111.56	\$44.62	01/09/2009	41	REVIEW PLEADING

**Time Tracking System  
Itemized Cost by Complaint**

Complaint 200618801

Report Date 12/11/2009

Page 4 of 5

Staff Code	Activity Hours	Staff Rate	Cost	Activity Date	Activity Code	Activity Description
HLL62A	1.00	\$111.56	\$111.56	01/09/2009	35	TELEPHONE CALLS
HLL62A	3.40	\$111.56	\$379.30	01/09/2009	25	REVIEW CASE FILE
HLL62A	0.20	\$111.56	\$22.31	01/09/2009	102	REVIEW EXPERT WITNESS REPORT
HLL62A	1.60	\$111.56	\$178.50	01/09/2009	31	PREPARE OR REVISE CLOSING ORDER
HLL36B	0.40	\$111.56	\$44.62	01/12/2009	26	PREPARE OR REVISE MEMORANDUM
HLL62A	4.00	\$111.56	\$446.24	01/13/2009	31	PREPARE OR REVISE CLOSING ORDER
HLL62A	0.20	\$111.56	\$22.31	01/13/2009	26	PREPARE OR REVISE MEMORANDUM
HLL62A	0.20	\$111.56	\$22.31	01/26/2009	25	REVIEW CASE FILE
HLL62A	0.10	\$111.56	\$11.16	02/16/2009	25	REVIEW CASE FILE
HLL62A	0.40	\$111.56	\$44.62	02/20/2009	70	CONFERENCES WITH LAWYERS
HLL62A	0.30	\$111.56	\$33.47	02/23/2009	35	TELEPHONE CALLS
HLL62A	0.10	\$114.59	\$11.46	04/23/2009	37	REVIEW LETTER
HLL62A	0.20	\$114.59	\$22.92	05/05/2009	37	REVIEW LETTER
HLL62A	0.20	\$114.59	\$22.92	06/15/2009	6	SUPPLEMENTAL INVESTIGATION
HLL62A	0.20	\$114.59	\$22.92	06/18/2009	37	REVIEW LETTER
HLL62A	0.10	\$114.59	\$11.46	06/22/2009	115	CONTACT WITH INVESTIGATORS
HLL62A	0.20	\$114.59	\$22.92	07/13/2009	115	CONTACT WITH INVESTIGATORS
HLL36B	0.40	\$112.43	\$44.97	08/27/2009	25	REVIEW CASE FILE
HLL62A	0.60	\$112.43	\$67.46	08/27/2009	41	REVIEW PLEADING
HLL62A	2.30	\$112.43	\$258.59	08/27/2009	28	PREPARE OR REVISE ADMINISTRATIVE COMPLAINT
HLL62A	0.70	\$112.43	\$78.70	08/27/2009	78	INITIAL REVIEW AND ANALYSIS OF COMPLAINT
HLL62A	0.20	\$112.43	\$22.49	08/28/2009	36	PREPARATION OR REVISION OF LETTER
HLL62A	0.20	\$112.43	\$22.49	08/31/2009	35	TELEPHONE CALLS
HLL62A	0.20	\$112.43	\$22.49	08/31/2009	37	REVIEW LETTER
HLL62A	0.10	\$112.43	\$11.24	08/31/2009	36	PREPARATION OR REVISION OF LETTER
HLL62A	0.10	\$112.43	\$11.24	08/31/2009	41	REVIEW PLEADING
HLL62A	0.10	\$112.43	\$11.24	09/22/2009	63	PRESENTATION OF CASES TO PROBABLE CAUSE PANEL
HLL62A	0.20	\$112.43	\$22.49	09/22/2009	28	PREPARE OR REVISE ADMINISTRATIVE COMPLAINT
HLL62A	0.10	\$112.43	\$11.24	09/22/2009	79	STIPULATION
HLL62A	0.30	\$112.43	\$33.73	09/22/2009	68	SIGNING CLOSING ORDERS, ADMINISTRATIVE COMPLAINTS AND REASONAB
HLL62A	0.80	\$112.43	\$89.94	09/29/2009	89	PROBABLE CAUSE PREPARATION
HLL62A	0.20	\$112.43	\$22.49	09/29/2009	36	PREPARATION OR REVISION OF LETTER
HLL62A	0.10	\$112.43	\$11.24	09/29/2009	37	REVIEW LETTER



\*\*\* CONFIDENTIAL \*\*\*

**Time Tracking System  
Itemized Cost by Complaint**

Complaint 200618801

Report Date 12/11/2009

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Staff Code	Activity Hours	Staff Rate	Cost	Activity Date	Activity Code	Activity Description
HLL62A	0.20	\$112.43	\$22.49	09/29/2009	74	MEETINGS WITH DEPARTMENT STAFF
HLL62A	0.50	\$112.43	\$56.22	09/29/2009	28	PREPARE OR REVISE ADMINISTRATIVE COMPLAINT
HLL62A	0.30	\$112.43	\$33.73	09/29/2009	26	PREPARE OR REVISE MEMORANDUM
HLL62A	0.10	\$112.43	\$11.24	09/29/2009	46	LEGAL RESEARCH
HLL62A	0.10	\$112.43	\$11.24	09/29/2009	79	STIPULATION
HLL62A	0.10	\$112.43	\$11.24	10/12/2009	37	REVIEW LETTER
HLL62A	0.20	\$112.43	\$22.49	10/26/2009	37	REVIEW LETTER
HLL62A	0.20	\$112.43	\$22.49	10/26/2009	46	LEGAL RESEARCH
HLL62A	0.30	\$112.43	\$33.73	10/26/2009	40	PREPARATION OF OR REVISION OF A PLEADING
HLL62A	0.50	\$112.43	\$56.22	10/26/2009	36	PREPARATION OR REVISION OF LETTER
HLL62A	0.20	\$112.43	\$22.49	11/06/2009	35	TELEPHONE CALLS
HLL62A	0.10	\$112.43	\$11.24	11/09/2009	36	PREPARATION OR REVISION OF LETTER
<b>Sub Total</b>	<b>55.50</b>		<b>\$6,394.21</b>			

<b>Total Cost</b>	<b>\$8,571.64</b>
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**\*\*\* CONFIDENTIAL \*\*\***  
**Time Tracking System**  
**Itemized Expense by Complaint**  
**Complaint**

Report Date: 12/11/2009

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Staff Code	Expense Date	Expense Amount	Expense Code	Expense Code Description
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SubTotal  
Total Expenses