

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 ISA R. RODRIGUEZ, State Bar No. 104838
Deputy Attorney General
3 California Department of Justice
2101 Webster Street, 12th Floor
4 Oakland, California 94612
Telephone: (510) 286-4042
5 Facsimile: (510) 286-4020
6 Attorneys for Complainant

7
8 **BEFORE THE**
9 **DIVISION OF MEDICAL QUALITY**
10 **MEDICAL BOARD OF CALIFORNIA**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation and) Case No. D1-90-3188
Petition to Revoke Probation)
12 Against:) **STIPULATED SETTLEMENT**
) **AND**
13 **GEORGE DEMETRIUS KARALIS, M.D.**) **DISCIPLINARY ORDER**
233 El Camino Del Mar)
14 San Francisco, CA 94121)
)
15 Physician and Surgeon)
Certificate No. A-024412,)
16)
Respondent.)
17)

18
19 **IT IS HEREBY STIPULATED AND AGREED** by and between the
20 parties to the above-entitled proceedings that the following
21 matters are true:

22 1. An Accusation and Petition to Revoke Probation in
23 case number D1-90-3188^{1/} was filed with the Division of Medical
24 Quality, of the Medical Board of California Department of
25

26 1. References to Accusation shall be deemed to include
27 the Petition to Revoke Probation and the First Supplemental
Accusation and Petition to Revoke Probation unless otherwise
noted.

1 Consumer Affairs (the "Division") and is currently pending
2 against George Demetrius Karalis, M.D., (the "respondent").

3 2. The Accusation, together with all statutorily
4 required documents, was duly served on the respondent and
5 respondent filed a Notice of Defense contesting the Accusation.
6 A copy of Accusation No. D1-90-3188 is attached as Exhibit "A"
7 and hereby incorporated by reference as if fully set forth.

8 3. The Complainant, Ron Joseph, is the Executive
9 Director of the Medical Board of California and brought this
10 action solely in his official capacity. The Complainant is
11 represented by the Attorney General of California, Daniel E.
12 Lungren, by and through Deputy Attorney General Isa R. Rodriguez.

13 4. The respondent is represented in this matter by
14 Louis C. Castro, Esq., whose address is 1004 Willow Street, San
15 Jose, CA 95125.

16 5. The respondent and his attorney have fully
17 discussed the charges contained in Accusation number D1-90-3188,
18 and the respondent has been fully advised regarding his legal
19 rights and the effects of this stipulation.

20 6. At all times relevant herein, respondent has been
21 licensed by the Medical Board of California under Physician and
22 Surgeon Certificate No. A-024412.

23 7. Respondent understands the nature of the charges
24 alleged in the Accusation and that, if proven at hearing, the
25 charges and allegations would constitute cause for imposing
26 discipline upon his certificate. Respondent is fully aware of
27 his right to a hearing on the charges contained in the

1 Accusation, his right to confront and cross-examine witnesses
2 against him, his right to the use of subpoenas to compel the
3 attendance of witnesses and the production of documents in both
4 defense and mitigation of the charges, his right to
5 reconsideration, appeal and any and all other rights accorded by
6 the California Administrative Procedure Act and other applicable
7 laws. Respondent knowingly, voluntarily and irrevocably waives
8 and gives up each of these rights.

9 8. Respondent admits that his care of patient M.L. as
10 set forth in Accusation No. D1-90-3188, could be viewed as being
11 repetitively negligent in that he failed to provide for proper
12 monitoring of this therapy and that therefore grounds exist for
13 imposing discipline on his certificate for repeated acts of
14 negligence. Based on this, respondent agrees to be bound by the
15 Division's Disciplinary Order as set forth below.

16 9. Notwithstanding paragraph 8, above, respondent
17 denies each and every other allegation contained in Accusation
18 No. D1-90-3188 and specifically denies any allegations of fraud,
19 dishonesty, corruption, gross negligence, or incompetence.

20 10. The admissions made by respondent herein are for
21 the purpose of this proceeding and any other proceedings in which
22 the Division of Medical Quality, Medical Board of California, is
23 involved, and shall not be admissible in any other criminal,
24 civil, or administrative proceedings.

25 11. Based on the foregoing admissions and stipulated
26 matters, the parties agree that the Division shall, without

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1 further notice or formal proceeding, issue and enter the
2 following order:

3 **DISCIPLINARY ORDER**

4 **IT IS HEREBY ORDERED** that certificate number A-024412
5 issued to George Demetrius Karalis, M.D., is revoked. However,
6 the revocation is stayed and respondent's probation is continued
7 for three years from June 9, 1995, the ending date of the
8 original period of probation, on the following terms and
9 conditions. Within 15 days after the effective date of this
10 decision the respondent shall provide the Division, or its
11 designee, proof of service that respondent has served a true copy
12 of this decision on the Chief of Staff or the Chief Executive
13 Officer at every hospital where privileges or membership are
14 extended to respondent or where respondent is employed to
15 practice medicine and on the Chief Executive Officer at every
16 insurance carrier where malpractice insurance coverage is
17 extended to respondent.

18 1. **COMMUNITY SERVICE - FREE SERVICES** In lieu of suspension
19 of his certificate, respondent shall, within sixty (60) days of
20 the effective date of this decision, respondent shall submit to
21 the Division or its designee for its prior approval a community
22 service program in which respondent shall provide free medical
23 and/or counseling or psychiatric services on a regular basis to a
24 community or charitable facility or agency for at least 16 hours
25 a month for the first 12 months of probation.

26 2. **EDUCATION COURSE** Within ninety (90) days of the
27 effective date of this decision, and on an annual basis

1 thereafter, respondent shall submit to the Division or its
2 designee for its prior approval an educational program or course
3 to be designated by the Division, which shall not be less than 20
4 hours per year, for the first year of probation. This program
5 shall be in addition to the Continuing Medical Education
6 requirements for re-licensure. Following the completion of each
7 course, the Division or its designee may administer an
8 examination to test respondent's knowledge of the course.
9 Respondent shall provide proof of attendance for 45 hours of
10 continuing medical education of which 20 hours were in
11 satisfaction of this condition and were approved in advance by
12 the Division or its designee.

13 3. ETHICS COURSE Within sixty (60) days of the
14 effective date of this decision, respondent shall enroll in a
15 course in Ethics approved in advance by the Division or its
16 designee, and shall successfully complete the course during the
17 first year of probation. If such a course is unavailable during
18 these time frames, the Board shall grant a reasonable extension
19 for compliance after respondent submits written proof that such
20 an extension is necessary.

21 4. MONITORING Respondent shall continue the current
22 monitoring program already in place. The current monitor shall
23 continue to provide periodic reports to the Division or its
24 designee.

25 The monitor shall have access to respondent's fiscal
26 and billing records and shall oversee respondent's billing
27 practices. The monitor's periodic reports shall include an

1 evaluation of respondent's billing practices. All costs of
2 monitoring shall be borne by the respondent.

3 If the monitor resigns or is no longer available,
4 respondent shall, within fifteen (15) days, move to have a new
5 monitor appointed through nomination by respondent and approval
6 by the Division or its designee.

7 Respondent is prohibited from engaging in the practice
8 of telephone therapy, similar to the telephone therapy that lead
9 to this accusation, during the term of probation.

10 5. OBEDIENT TO ALL LAWS Respondent shall obey all federal,
11 state and local laws, and all rules governing the practice of
12 medicine in California.

13 6. QUARTERLY REPORTS Respondent shall submit
14 quarterly declarations under penalty of perjury on forms provided
15 by the Division, stating whether there has been compliance with
16 all the conditions of probation.

17 7. PROBATION SURVEILLANCE PROGRAM COMPLIANCE Respondent
18 shall comply with the Division's probation surveillance program.
19 Respondent shall, at all times, keep the Division informed of his
20 addresses of business and residence which shall both serve as
21 addresses of record. Changes of such addresses shall be
22 immediately communicated in writing to the Division. Under no
23 circumstances shall a post office box serve as an address of
24 record.

25 Respondent shall also immediately inform the Division,
26 in writing, of any travel to any areas outside the jurisdiction
27 of California which lasts, or is contemplated to last, more than

1 thirty (30) days.

2 8. INTERVIEW WITH THE DIVISION, ITS DESIGNEE OR ITS
3 DESIGNATED PHYSICIAN(S) Respondent shall appear in person for
4 interviews with the Division, its designee or its designated
5 physician(s) upon request at various intervals and with
6 reasonable notice.

7 9. TOLLING FOR OUT-OF-STATE PRACTICE, RESIDENCE OR IN-STATE NON-
8 PRACTICE In the event respondent should leave California to
9 reside or to practice outside the State or for any reason should
10 respondent stop practicing medicine in California, respondent
11 shall notify the Division or its designee in writing within ten
12 (10) days of the dates of departure and return or the dates of
13 non-practice within California. Non-practice is defined as any
14 period of time exceeding thirty days in which respondent is not
15 engaging in any activities defined in Sections 2051 and 2052 of
16 the Business and Professions Code. All time spent in an
17 intensive training program approved by the Division or its
18 designee shall be considered as time spent in the practice of
19 medicine. Periods of temporary or permanent residence or
20 practice outside California or of non-practice within California,
21 as defined in this condition, will not apply to the reduction of
22 the probationary period.

23 10. COMPLETION OF PROBATION Upon successful completion
24 of probation, respondent's certificate shall be fully restored.

25 11. VIOLATION OF PROBATION If respondent violates
26 probation in any respect, the Division, after giving respondent
27 notice and the opportunity to be heard, may revoke probation and

1 carry out the disciplinary order that was stayed. If an
2 accusation or petition to revoke probation is filed against
3 respondent during probation, the Division shall have continuing
4 jurisdiction until the matter is final, and the period of
5 probation shall be extended until the matter is final.

6 12. COST RECOVERY The respondent is hereby ordered to
7 reimburse the Division the amount of \$4,800.00 beginning thirty
8 (30) days after the effective date of this decision for its
9 investigative and prosecution costs. Such payment shall be in 24
10 equal installments at the rate of \$200.00 per month and shall be
11 by cashier's check or money order made payable to the Medical
12 Board of California. Failure to reimburse the Division's cost of
13 investigation and prosecution shall constitute a violation of the
14 probation order, unless the Division agrees in writing to payment
15 by an installment plan because of financial hardship. The filing
16 of bankruptcy by the respondent shall not relieve the respondent
17 of his responsibility to reimburse the Division for its
18 investigative and prosecution costs.

19 13. PROBATION COSTS Respondent shall pay the costs
20 associated with probation monitoring for each year of probation
21 beginning with the effective date of this decision. Such costs
22 are currently set at \$2,304.00 per year, but may be adjusted on
23 an annual basis. Such costs shall be payable to the Division of
24 Medical Quality and delivered to the designated probation
25 surveillance monitor at the beginning of each calendar year.
26 Failure to pay costs within 30 days of the due date shall
27 constitute a violation of probation.

1 Disciplinary Order. I have fully discussed the terms and
2 conditions and other matters contained therein with my attorney,
3 Louis C. Castro. I understand the effect this Stipulated
4 Settlement and Disciplinary Order will have on my certificate,
5 and agree to be bound thereby. I enter this stipulation freely,
6 knowingly, intelligently and voluntarily.

7 DATED: 09-24-96. *George Demetrius Karalis*
8 GEORGE DEMETRIUS KARALIS, M.D.
9 Respondent

10 I have read the above Stipulated Settlement and
11 Disciplinary Order and approve of it as to form and content. I
12 have fully discussed the terms and conditions and other matters
13 therein with respondent.

14 DATED: 9-26-96.

15 *Louis C. Castro*
16 LOUIS C. CASTRO, ESQ.
17 Attorney for Respondent

18 **ENDORSEMENT**

19 The foregoing Stipulated Settlement and Disciplinary
20 Order is hereby respectfully submitted for the consideration of
21 the Division of Medical Quality, Medical Board of California,
22 Department of Consumer Affairs.

23 DATED: 10/1/96.

24 DANIEL E. LUNGREN, Attorney General
25 of the State of California

26 *Isa R. Rodriguez*
27 ISA R. RODRIGUEZ
Deputy Attorney General

Attorneys for Complainant

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**DECISION AND ORDER
OF THE
DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA**

The foregoing Stipulation and Order, in case number D1-90-3188, is hereby adopted as the Order of the Division of Medical Quality, Medical Board of California, Department of Consumer Affairs. An effective date of December 16, 1996, has been assigned to this Decision and Order.

Made this 15th day of November, 1996.

J. Hubbell O

FOR THE DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA

Exhibit: Accusation and Petition to Revoke Probation
and First Supplemental

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 ISA R. RODRIGUEZ
Deputy Attorney General
3 2101 Webster Street, 12th Floor
Oakland, CA 94612-3049
4 Telephone: (510) 286-4042

5 Attorneys for Complainant

6
7 BEFORE THE DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA
8 STATE OF CALIFORNIA

9 In the Matter of the Accusation)
and Petition to Revoke Probation)
10 Against:) No. D1-90-3188
)
11 GEORGE DEMETRIUS KARALIS, M.D.) ACCUSATION AND PETITION
235 El Camino Del Mar) TO REVOKE PROBATION
12 San Francisco, CA 94121)
Physician and Surgeon)
13 Certificate No. A-024412,)
)
14 Respondent.)

15
16 DIXON ARNETT, complainant herein, charges and alleges
17 as follows:

18 1. He is the Executive Director of the Medical Board
19 of California, Department of Consumer Affairs, State of
20 California (hereinafter referred to as "the Board") and makes
21 these charges and allegations solely in his official capacity.

22 LICENSE HISTORY

23 2. On or about September 1, 1971, the Board issued to
24 respondent George Demetrius Karalis, M.D. (hereinafter referred
25 to as "respondent") Physician and Surgeon Certificate No. A-
26 024412. The certificate is currently renewed to November 30,
27 1995. Said respondent has been previously disciplined and is

1 currently on probationary status with the Board as set forth
2 below.

3 3. Effective June 9, 1990 in Case No. D-3800 before
4 the Division of Medical Quality of the Board, respondent's
5 certificate was revoked, but the revocation was stayed, and
6 respondent was placed upon probation for a period of five (5)
7 years subject to certain terms and conditions. Said discipline
8 was imposed upon the basis of respondent's stipulation that he
9 was convicted in 1987 of an offense substantially related to the
10 qualifications, functions or duties of a physician and surgeon,
11 to wit: Grand Theft (Medi-Cal Program).

12 4. The terms and conditions included at paragraph 7
13 of the Board's decision:

- 14 (1) 30 day suspension of practice.
- 15 (2) Oral clinical examination in psychiatry.
- 16 (4) Physician monitor for billings.
- 17 (5) Physician supervisor for practice.
- 18 (6) Ongoing psychotherapy.
- 19 (7) Obey all federal, state and local laws
20 and all rules governing the practice of
21 medicine in California.
- 22 (8) Quarterly reports under penalty of perjury
23 concerning compliance with probation.

24 5. Respondent served his 30 day suspension and passed
25 his oral clinical examination in psychiatry in August of 1990.
26 His first physician monitor for billing and practice was Paul D.
27 Lowinger, M.D., who served until March of 1992 when problems

1 arose concerning Dr. Lowinger's practice, including problems of
2 Medi-Cal fraud. Dr. Lowinger's physician and surgeon's
3 certificate is currently revoked. Since that time, respondent
4 has had Kenneth Passamaneck, M.D. as his monitor/supervisor.
5 Respondent has engaged in ongoing psychotherapy with Douglas
6 Dietrick, Ph.D. Respondent provided regular quarterly reports
7 attesting that he was in compliance with probation.

8 STATUTES AND REGULATIONS

9 6. Section 2001 of the Business and Professions
10 Code^{1/} provides for the existence of the Board.

11 7. Section 2003 provides for the existence of the
12 Division of Medical Quality (hereinafter referred to as "the
13 Division") within the Board.

14 8. Section 2004 provides, *inter alia*, that the
15 Division is responsible for the administration and hearing of
16 disciplinary actions involving enforcement of the Medical
17 Practice Act (§2000 *et seq.*) and the carrying out of disciplinary
18 action appropriate to findings made by the Division or an
19 administrative law judge within respect to the quality of medical
20 practice carried out by physician and surgeon certificate
21 holders.

22 9. Sections 2220, 2234 and 2227 together provide that
23 the Division shall take disciplinary action against the holder of
24 a physician and surgeon certificate who is guilty of
25 unprofessional conduct.

26
27 1. All statutory references are to the Business and
Professions Code unless otherwise specified.

1 the standard of the community of licensees is unprofessional
2 conduct for a physician and surgeon.

3 14. At all times mentioned herein, respondent was
4 engaged in the private practice of psychiatry in San Francisco,
5 California.

6 STANDARD OF PRACTICE

7 15. Evaluation and treatment of a psychiatric patient
8 over the telephone is inappropriate and inadequate except for the
9 most focused treatment goal, such as the evaluation of medication
10 response and side effects. Crisis intervention services over the
11 telephone is appropriate only as an adjunct to face-to-face
12 clinical contact between the physician and his patient. The many
13 interpersonal and non-verbal nuances of a psychotherapeutic
14 relationship cannot be competently established and continued over
15 the telephone. This modality should be reserved for the most
16 unusual of clinical circumstances, which must be documented.

17 16. Psychotherapy and hypnotherapy are used for
18 support and insight in psychiatric treatment. The techniques are
19 much more complex than holding a conversation with a patient in
20 person or over the telephone. Cognizance of a patient's history
21 and issues of transference and counter-transference are essential
22 aspects of such therapy. The clinical record must include
23 awareness of these parameters in order to document that competent
24 therapy is being provided.

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10. Section 2234 provides, in part, as follows:

"The Division of Medical Quality shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

(a) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate, any provision of this chapter.

(b) Gross negligence.

(c) Repeated negligent acts.

(d) Incompetence

(e) The commission of any act involving dishonesty or corruption which is substantially related to the qualifications, functions or duties of a physician and surgeon."

11. Section 810 provides, in part, that it shall constitute unprofessional conduct and grounds for disciplinary action, including suspension or revocation of a certificate, for a health care professional to knowingly present or cause to be presented any false or fraudulent claim for the payment of a loss under a contract of insurance and/or to knowingly prepare, make or subscribe any writing, with intent to present or use the same or allow it to be presented or used in support of any such claim.

12. Section 2261 provides that knowingly making or signing any certificate or other document directly or indirectly related to the practice of medicine which falsely represents the existence or non-existence of a state of facts, constitutes unprofessional conduct.

13. Section 725 provides, in part, that repeated acts of clearly excessive administering of treatment as determined by

1 FACTS RE: PATIENT G. A.

2 17. In or about March 1990 through in or about March
3 of 1991, respondent undertook to care for and treat patient
4 G.A.,^{2/} a male adult. The treatment was provided and paid for
5 through G.A.'s Workers' Compensation carrier pursuant to a claim
6 made for job-related injury. G.A. had been referred to
7 respondent by Sierra Clinic, which had diagnosed G.A. as
8 suicidal. Respondent diagnosed G.A. as suffering from depressive
9 disorder and panic attacks. G.A. also suffered from acute and
10 chronic alcohol abuse and abuse of controlled substances, such as
11 marijuana. In respondent's initial record on G.A., respondent
12 noted suicidal ideation.

13 18. Respondent treated G.A. with psychotherapy,
14 hypnotherapy, Prozac^{3/} and Valium.^{4/} According to respondent's
15 records, there were 16 scheduled visits with G.A. at respondent's
16 office usually of 90 minutes duration with some lasting 120 to
17 180 minutes and 29 telephone appointments over the one year
18 period of treatment, varying in length from 15 minutes to 90
19 minutes, with two (2) calls being 105 minutes in length.

20
21 2. Patients are referred to herein by initials only in
22 order to protect their privacy. Respondent will be provided with
23 actual patient names pursuant to any request for discovery.

24 3. Prozac is a brand name for the generic substance
25 fluoxetine hydrochloride and is a dangerous drug pursuant to
26 Business and Professions Code section 4211. Prozac is an
27 antidepressant medication.

28 4. Valium is a brand name for the generic substance
29 diazepam. Valium is a Schedule IV controlled substance under
30 Health and Safety Code section 11057(d)(7) and a dangerous drug
31 under Business and Professions Code section 4211. Valium is
32 indicated for the management of anxiety disorders and must be
33 carefully monitored in addiction-prone individuals.

1 Respondent also repeatedly charged for appointments broken
2 without adequate notice. There were also a number of billings
3 for medical status reports to the carrier. True and correct
4 copies of respondent's insurance billings to Industrial
5 Indemnity, G.A.'s Workers' Compensation carrier, are attached
6 hereto as Exhibit A and incorporated herein by reference.

7 19. According to the patient's calendar and separate
8 recollection, respondent's billings did not accurately reflect
9 the number of times he was seen in the office, and the number of
10 telephone treatments indicated by respondent's billings were also
11 not accurate. Both calculations by respondent appeared to be far
12 in excess of the actual number, and telephone treatment did not
13 commence until in or about July of 1990.

14 20. Respondent's treatments of G.A., whether on the
15 telephone or in respondent's office, consisted of "hypnotizing"
16 G.A. and then listening to "relaxation tapes" for one to two
17 hours. Each tape was about 15 minutes in length, and respondent
18 changed the tapes every 15 minutes, talking with the patient
19 briefly between tapes. There was little, if any, discussion
20 therapy with G.A, yet respondent diagnosed and prescribed
21 dangerous drugs for this patient on the basis of this limited
22 interaction.

23 21. Respondent terminated G.A.'s therapy in March of
24 1991, citing the fact that G.A.'s state disability had "run out."
25 The patient did not receive significant benefit from respondent's
26 methods and continued to be depressed and unemployed.

27 //

1 FIRST CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

2 22. Respondent's conduct in treating patient G.A., as
3 described above, constitutes unprofessional conduct, gross
4 negligence and/or repeated acts of negligence, and/or
5 incompetence and is in violation of condition (7) of his present
6 probation in that:

7 a. He failed to adequately diagnose G.A.'s
8 condition, as reflected in his medical record, which
9 does not contain adequate information upon which to
10 base a diagnosis. It is not possible to treat a
11 seriously and acutely ill patient without intensive, in
12 person, discussion therapy. G.A. was presented to
13 respondent as suicidal, and yet there was no indication
14 that appropriate treatment was provided for this
15 symptom. There was a three week hiatus between the
16 initial contact and the next appointment.

17 b. He failed to provide G.A. with competent
18 treatment for G.A.'s condition. There were no progress
19 notes indicating the rationale for the treatment
20 prescribed and no notations of the appropriateness and
21 effectiveness of interventions as treatment proceeded.

22 c. He utilized hypnotherapy and psychotherapy
23 excessively for this patient's condition, according to
24 his billings and notes, thereby potentially harming the
25 patient by reinforcing his illness.

26 d. He provided ineffective anti-depressant
27 therapy in that he did not monitor the patient's

1 reaction to the drugs prescribed and change drugs or
2 provide some alternative when the drugs were not
3 effective in alleviating the depression.

4 e. He abandoned the patient when his
5 disability coverage failed to continue.

6 f. Respondent exploited patient G.A. in order to
7 maximize billings to the insurance carrier rather than
8 to provide optimal care for the patient's clinical
9 condition.

10 23. Therefore, cause exists for disciplinary action
11 and revocation of respondent's probation pursuant to sections
12 2234, and/or 2234(a), and/or (b) and/or (c).

13 SECOND CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

14 24. Respondent's conduct in treating patient G.A., as
15 described above, constitutes acts of dishonesty and corruption,
16 presenting a false claim for the payment of a loss under a
17 contract of insurance, and/or knowingly making or signing a
18 document directly related to the practice of medicine which
19 falsely represents the existence or non-existence of a state of
20 facts and is in violation of condition (7) of his present
21 probation in that:

22 a. He billed the insurance carrier repeatedly
23 for broken appointments with G.A., when either the
24 appointments did not exist or were not broken. It is
25 unethical to bill repeatedly for broken appointments
26 even if they were broken. On several occasions, as
27 shown in Exhibit A, respondent billed for both broken

1 appointments and telephone consultations on the same
2 date.

3 b. His medical record for G.A. fails to
4 reflect that the treatment for which the patient's
5 insurance was billed was actually provided. There is
6 no clinical information provided in the record which
7 evidences so many hours of psychotherapy and/or
8 hypnotherapy either in the office or on the telephone.
9 In addition, the patient indicates that respondent did
10 not speak with him for more than a few minutes on any
11 given appointment day. Respondent billed for the time
12 the patient spent listening to audio tapes, rather than
13 time he actually spent in clinical interaction with the
14 patient.

15 c. His medical record for G.A. fails to
16 substantiate hours billed for "medical research" and
17 "records review."

18 d. Respondent billed \$100.00 each for "medical
19 reports" which consisted of nothing more than short
20 answers to a few questions.

21 e. Respondent billed for services for which no
22 true, prior appointment had been made. Respondent
23 could produce no appointment log which indicated that
24 such appointments were made, and G.A. indicates that
25 the telephone contacts were not arranged in advance.

26 f. Respondent manipulated G.A. for the goals of
27 payment rather than the goals of treatment.

1 g. Respondent's record for G.A. fails to justify
2 a work-related injury.

3 h. Respondent billed the Workers' Compensation
4 carrier for psychotherapy and/or hypnotherapy when in
5 truth and in fact, he was not providing such services
6 or not providing them to nearly the extent billed in
7 that the "services" primarily consisted of the playing
8 of audio tapes for the patients over the period of the
9 alleged psychotherapy session.

10 25. Therefore, cause exists for disciplinary action
11 and revocation of respondent's probation pursuant to section 2234
12 through sections 2234(e) and/or section 810 and/or section 2261.

13 THIRD CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

14 26. Respondent's conduct in treating G.A., as
15 described above, constitutes clearly excessive administration of
16 treatment by the standards of the community of licensees, and
17 therefore cause exists for disciplinary action and revocation of
18 respondent's probation pursuant to section 2234 through section
19 725.

20 FACTS RE: PATIENT C.B.

21 27. From in or about May of 1990 through in or about
22 February of 1991, respondent undertook to care for and treat
23 patient C.B., a female adult. The treatment was provided and
24 paid for through C.B.'s Workers' Compensation carrier pursuant to
25 a claim made for job-induced stress. C.B. was referred to
26 respondent from Sierra Clinic and arrived with a diagnosis of
27 "major depression." Respondent's initial notes indicate that

1 C.B. had bought a gun that her boyfriend was keeping for her,
2 that C.B. was occasionally suicidal, and that C.B. had been
3 hearing voices for one and one-half months. Respondent's notes
4 of the initial visit indicate "most extreme anxiety" and
5 "hospitalized depressed." His initial report to Industrial
6 Indemnity, C.B.'s Workers' Compensation carrier, prescribed
7 "medical hypnosis for psychopathology," insight and supportive
8 psychotherapy, and psychotropic medications. Respondent
9 prescribed Prozac for C.B. at her first appointment and provided
10 no prescription medication to manage her psychiatric condition
11 thereafter.

12 28. According to respondent's records, over the 37
13 week period of treatment, there were 28 phone consultations with
14 C.B., varying in length from 15 minutes to 90 minutes, with two
15 consultations being 180 minutes in length. There were three (3)
16 psychotherapy appointments in respondent's office, early in the
17 treatment, two psychotherapy/hypnotherapy appointments lasting 90
18 minutes and one 120 minute psychotherapy session. Respondent
19 also repeatedly charged for appointments broken without adequate
20 notice. There were also a number of billings for medical status
21 reports to the carrier. True and correct copies of respondent's
22 billings to Industrial Indemnity, C.B.'s Workers' Compensation
23 carrier, are attached hereto as Exhibit B and incorporated herein
24 by reference.

25 29. Respondent's psychotherapy/hypnotherapy sessions
26 with C.B., whether in the office or on the telephone consisted of
27 a series of 15 minute audiotapes featuring music or lectures

1 concerning self esteem and positive thinking, with respondent
2 conversing with C.B. briefly at the beginning of the session and
3 in between tapes. There was very little, if any, insight
4 oriented psychotherapy or hypnotherapy or any discussion of
5 methods of reducing C.B.'s symptoms. Respondent did not discuss
6 with C.B. at any time the stress factors surrounding C.B.'s
7 Workers' Compensation claim.

8 30. C.B. was not provided with a consistent
9 appointment each week or any kind of appointment schedule;
10 respondent would simply inform her when he would next call.

11 31. Respondent insisted upon sessions weekly, even
12 when, after several months, C.B. requested that they occur less
13 often. Respondent indicated to C.B. that if C.B. did not take
14 his calls, her Worker's Compensation carrier would curtail her
15 benefits.

16 32. C.B. indicated to respondent that the calls were
17 too long, and curtailed some telephone calls early; respondent
18 insisted, however, that the weekly at least hour long telephone
19 sessions continue. Respondent did not provide any information
20 concerning the time by which C.B. should call him to cancel an
21 appointment. C.B. did cancel several appointments by leaving a
22 message on respondent's answering machine.

23 33. When respondent called C.B. for therapy, C.B.
24 could not get his attention during the playing of the tapes, even
25 when she shouted into the telephone. C.B. often laid down the
26 telephone receiver and went about her business. In late January
27 of 1991, C.B. obtained new employment and called respondent and

1 indicated that his services were terminated. A February 1991
2 telephone appointment was canceled at that time.

3 FOURTH CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

4 34. Respondent's conduct in treating patient C.B., as
5 described above, constitutes unprofessional conduct, gross
6 negligence and/or repeated acts of negligence, and/or
7 incompetence and is in violation of condition (7) of his present
8 probation in that:

9 a. He failed to adequately diagnose C.B.'s
10 condition, as reflected in his medical record, which
11 contains a diagnosis of severe acute depression, non-
12 psychotic. Respondent's records are sketchy, and the
13 diagnosis is suspect in the face of C.B.'s history of
14 hearing voices. Proper treatment of C.B.'s condition
15 would be predicated upon whether or not her illness was
16 psychotic.

17 b. He failed to provide C.B. with competent
18 treatment for C.B.'s condition. There were no progress
19 notes indicating the rationale for the treatment
20 prescribed and no notations of the appropriateness and
21 effectiveness of interventions as treatment proceeded.
22 Medication is a central feature of treatment for severe
23 depressive illness and after the initial prescription
24 for Prozac, the only drug recommended by respondent was
25 diphenhydramine, an over the counter antihistamine, for
26 sleep.

27 c. Telephone therapy, relaxation tapes and

1 motivational tapes are inadequate and inappropriate
2 means to treat this patient's serious psychiatric
3 illness. It is not possible to treat a seriously and
4 acutely ill patient without intensive, in person,
5 discussion therapy.

6 d. Respondent provided excessively long therapy
7 sessions, which are not indicated and are in fact
8 inappropriate for C.A.'s psychiatric condition.

9 e. Respondent exploited patient C.B. in order to
10 maximize billings to the insurance carrier rather than
11 to provide optimal care for the patient's clinical
12 condition.

13 35. Therefore, cause exists for disciplinary action
14 and revocation of respondent's probation pursuant to sections
15 2234, and/or 2234(a), and/or (b) and/or (c).

16 FIFTH CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

17 36. Respondent's conduct, in treating patient C.A., as
18 described above, constitutes acts of dishonesty and corruption,
19 presenting false claims for the payment of a loss under a
20 contract of insurance, and/or knowingly making or signing a
21 document directly related to the practice of medicine which
22 falsely represents the existence or non-existence of a state of
23 facts and is in violation of condition (7) of his present
24 probation in that:

25 a. He billed the insurance carrier repeatedly
26 for broken appointments with C.B., when he failed to
27 inform the patient of the proper time frame in which to

1 cancel an appointment and failed to provide a
2 consistent appointment procedure. It is unethical to
3 bill repeatedly for broken appointments even if they
4 were broken. On several occasions, as shown in Exhibit
5 B, respondent billed for both broken appointments and
6 telephone consultations on the same date.

7 b. His medical record for C.B. fails to
8 reflect that the treatment for which the patient's
9 insurance was billed was actually provided. There is
10 no clinical information provided in the record which
11 evidences so many hours of psychotherapy and/or
12 hypnotherapy either in the office or on the telephone.
13 In addition, the patient indicates that respondent did
14 not speak with him for more than a few minutes on any
15 given appointment day. Respondent billed for the time
16 the patient spent listening to audio tapes, rather than
17 time he actually spent in clinical interaction with the
18 patient.

19 c. His medical record for C.B. fails to
20 substantiate 270 hours billed for "review of medical
21 literature and/or research materials."

22 d. Respondent billed \$100.00 each for "medical
23 reports" which consisted of nothing more than short
24 answers to a few questions.

25 e. Respondent manipulated the patient for the
26 goals of payment rather than the goals of treatment.

27 f. Respondent's record for C.B. fails

1 to substantiate a work-related injury.

2 g. Respondent billed the Workers' Compensation
3 carrier for psychotherapy and/or hypnotherapy when in
4 truth and in fact, he was not providing such services
5 or not providing them to nearly the extent billed in
6 that the "services" primarily consisted of the playing
7 of audio tapes for the patients over the period of the
8 alleged psychotherapy session.

9 37. Therefore, cause exists for disciplinary action
10 and revocation of respondent's probation pursuant to section 2234
11 through sections 2234(e) and/or section 810 and/or section 2261.

12 SIXTH CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

13 38. Respondent's conduct in treating C.B., as
14 described above, constitutes clearly excessive administration of
15 treatment by the standards of the community of licensees, and
16 therefore cause exists for disciplinary action and revocation of
17 respondent's probation pursuant to section 2234 through section
18 725.

19 FACTS RE: PATIENT P.E.

20 39. From in or about February of 1991 through in or
21 about July 9, 1991, respondent undertook to care for and treat
22 P.E., a female adult. The treatment was in relation to an
23 assault P.E. received while at work and was paid for in
24 connection with her Workers' Compensation claim for this injury.
25 Respondent diagnosed post-traumatic stress disorder. He
26 prescribed insight and supportive psychotherapy, hypnotherapy,
27 and possible psychotropic medication. According to respondent's

1 notes, the patient complained of anxiety, nightmares, heightened
2 startle response, suicidal ideation, and symptoms of depression.
3 Respondent prescribed Prozac for P.E.'s condition. P.E. remained
4 anxious during respondent's 19 weeks of treatment and treatment
5 ended when P.E. moved out of the area.

6 40. During the 19 week period, respondent saw P.E. in
7 person once for 45 minutes and once for 90 minutes, and these
8 appointments took place at the patient's home. There were 14
9 telephone treatments of P.E. ranging from 15 minutes to one (1)
10 hour, with the initial consultation occurring on February 21,
11 1991 being 105 minutes in length. A true and correct copy of
12 respondent's billings to State Compensation Insurance Fund,
13 P.E.'s Workers' Compensation carrier, are attached hereto as
14 "Exhibit C" and incorporated herein by reference.

15 SEVENTH CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

16 41. Respondent's conduct in treating patient P.E., as
17 described above, constitutes unprofessional conduct, gross
18 negligence and/or repeated acts of negligence, and/or
19 incompetence and is in violation of condition (7) of his present
20 probation in that:

21 a. Evaluation and treatment of such a patient
22 could not properly be carried out on the telephone.
23 Respondent failed to provide P.E. with appropriate and
24 effective treatment for her condition.

25 b. Hypnotherapy might have been a highly
26 effective tool for alleviation of some of this
27 patient's symptoms, but respondent's clinical record

1 fails to substantiate that such treatment was provided.

2 c. Respondent prescribed Prozac for this
3 patient's condition. Careful monitoring of the
4 patient's response to this medication is necessary,
5 with adjustment of dosage as indicated. This is not
6 evident in the clinical record.

7 d. Respondent conducted the initial appointment
8 with this new patient over the telephone, which is
9 highly inappropriate, especially given the patient's
10 condition. Respondent provides no reason for this
11 conduct in his clinical record.

12 e. Respondent twice traveled to the patient's
13 home to conduct therapy. Such conduct is inappropriate
14 unless there are exigent circumstances. There was no
15 documented reason in respondent's clinical record why
16 therapy had to be conducted in the patient's home
17 instead of at his office, or even over the telephone.
18 Respondent ignored the transferential implications
19 of such special interventions.

20 42. Therefore, cause exists for disciplinary action
21 and revocation of respondent's present probation pursuant to
22 sections 2234 and 2234(b), (c), and/or (d).

23 **EIGHTH CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION**

24 43. Respondent's conduct, in treating patient P.E., as
25 described above, constitutes acts of dishonesty and corruption
26 and is in violation of condition (7) of his present probation in
27 that:

1 a. There is no documentation in the record to
2 justify the amount of telephone contact that is billed.

3 b. It is improper to bill for time spent before
4 actually meeting the patient in person.

5 c. It is improper to bill for travel time to and
6 from the patient's home on the two occasions he saw
7 this patient in person, especially when the requirement
8 for such a home visit is not documented in the medical
9 record.

10 d. Respondent billed \$100.00 each for "medical
11 reports" which consisted of nothing more than short
12 answers to a few questions.

13 44. Therefore, cause exists for disciplinary action
14 and revocation of respondent's present probation pursuant to
15 sections 2234 through 2234(e) and/or section 810 and/or section
16 2261.

17 FACTS RE: PATIENT P.H.

18 45. From in or about October of 1990 through in or
19 about March of 1991, respondent undertook to care for and treat
20 P.H., a female adult. P.H. was self-referred to respondent for
21 the treatment of anxiety and depression allegedly caused by
22 discrimination by her employer. Treatment was billed to
23 Cincinnati Insurance Company (c/o Crawford & Co.), P.H.'s
24 Workers' Compensation carrier.

25 46. Respondent diagnosed P.H.'s condition as
26 "depressive disorder." P.H.'s self-rating scale, filled out by
27 her at respondent's request, was interpreted by respondent to

1 reflect marked anxiety and an "outpatient" level of depression.
2 He prescribed BuSpar^{5/} and diphenhydramine for her condition and
3 also hypnosis, insight and supportive psychotherapy. He noted
4 that she suffered from non-insulin dependent diabetes. P.H.
5 remained symptomatic throughout the treatment, although she
6 indicated that the treatment helped her.

7 47. Respondent billed for three (3) visits by P.H. to
8 his office. He billed for 195 minutes of psychotherapy in his
9 office, as well as 60 minutes of telephone consultation with the
10 patient on 10/26/90. He billed for 90 minutes of psychotherapy
11 in his office on 11/9/90 and for 45 minutes of psychotherapy and
12 45 minutes of hypnotherapy in his office on 2/26/91. The
13 remainder of the treatment was telephone consultation. There
14 were 25 sessions billed ranging from 30 minutes to 90 minutes
15 with one session billed at 180 minutes and a few billed at 15
16 minutes. This included a billing for initial contact with the
17 patient by telephone on 10/24/90 and 10/25/90. Respondent also
18 billed for five (5) broken appointments without adequate
19 notification. True and correct copies of respondent's billings
20 to Cincinnati Insurance Company, P.H.'s Workers' Compensation
21 carrier, are attached hereto as Exhibit D and incorporated herein
22 by reference.

23 48. On 10/26/91, P.H. went to respondent's office and
24 filled out papers and respondent's self-rating scale. She spoke
25

26 5. BuSpar is a trade name for the generic substance
27 buspirone hydrochloride and is a dangerous drug pursuant to
Business and Professions Code section 4211. BuSpar is used in
the management of anxiety disorders.

1 to respondent for approximately one hour and then listened to
2 audio tapes for 60 to 90 minutes. P.H. does not recall speaking
3 with respondent on the telephone for one hour the same day.

4 49. The telephone appointments occurred approximately
5 weekly and consisted of respondent speaking with her for a few
6 minutes and then listening to audio tapes of music or "talking"
7 for an hour or more. P.H. broke two or three appointments with
8 respondent by leaving a message on his answering machine, but
9 there was possibly only one appointment that was broken just
10 prior to that appointment.

11 NINTH CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION

12 50. Respondent's conduct in treating patient P.H., as
13 described above, constitutes unprofessional conduct, gross
14 negligence and/or repeated acts of negligence, and/or
15 incompetence and is in violation of condition (7) of his present
16 probation in that:

17 a. He failed to adequately diagnose P.H.'s
18 condition, as reflected in his medical record, which
19 does not contain adequate information upon which to
20 base a diagnosis. Respondent failed to document the
21 history of present illness, past medical and
22 psychiatric history, relevant family history, mental
23 status exam, and the rationale for the treatment plan.
24 He makes no note of discussing the patient's self-
25 rating scale.

26 b. Respondent inappropriately treated a patient
27 diagnosed with an acute psychiatric condition primarily

1 over the telephone. Supportive psychotherapy, insight
2 psychotherapy, and hypnotherapy are modalities that
3 require face-to-face interaction, especially with a new
4 patient.

5 c. According to respondent's billings and
6 records, he actually conducted the initial interviews
7 with P.H. over the telephone, two days before actually
8 seeing the patient. This is highly inappropriate, and
9 there is no reason documented indicating the necessity
10 for this procedure.

11 d. Respondent inappropriately reinforced the
12 illness of a patient by allowing her not to deal with
13 her anxiety over traveling to appointments. Telephone
14 therapy encouraged dependency and lack of autonomy in
15 this patient.

16 e. Respondent failed to monitor the patient's
17 reaction to drug treatment therapy.

18 f. Respondent exploited patient P.H. in order to
19 maximize billings to the insurance carrier rather than
20 to provide optimal care for the patient's clinical
21 condition.

22 51. Therefore, cause exists for disciplinary action
23 and revocation of respondent's current probation pursuant to
24 section 2234 and/or 2234(b), and/or (c), and/or (d).

25 **TENTH CAUSE FOR DISCIPLINARY ACTION AND REVOCATION OF PROBATION**

26 52. Respondent's conduct, in treating patient P.H., as
27 described above, constitutes acts of dishonesty and corruption,

1 presenting a false claim for the payment of a loss under a
2 contract of insurance, and/or knowingly making or signing a
3 document directly related to the practice of medicine which
4 falsely represents the existence or non-existence of a state of
5 facts and is in violation of condition (7) of his present
6 probation in that:

7 a. He billed the insurance carrier repeatedly
8 for appointments broken without adequate notice when,
9 in fact, either the appointments were not broken or
10 adequate notice was given. It is unethical to bill
11 repeatedly for broken appointments even if they were
12 broken.

13 b. It is inappropriate to bill for services
14 rendered prior to actually meeting the patient.

15 c. His medical record for P.H. fails to
16 reflect that the treatment for which the patient's
17 insurance was billed was actually provided. There is
18 no clinical information provided in the record which
19 evidences so many hours of psychotherapy and/or
20 hypnotherapy either in the office or on the telephone.

21 d. In addition, the patient indicates that
22 respondent did not speak with her for more than a few
23 minutes on any given appointment day. Respondent
24 billed for the time the patient spent listening to
25 audio tapes, rather than time he actually spent in
26 clinical interaction with the patient. Time spent by a
27 patient listening to a tape is not properly billed as

1 an expenditure of the physician's time.

2 e. His medical record for P.H. fails to
3 substantiate hours billed for "reviewing medical
4 literature and/or research materials."

5 f. Respondent billed \$100.00 each for "medical
6 reports" which consisted of nothing more than short
7 answers to a few questions.

8 g. Respondent manipulated P.H. for the goals of
9 payment rather than the goals of treatment.

10 53. Therefore, cause exists for disciplinary action
11 and revocation of respondent's probation pursuant to section 2234
12 through sections 2234(e) and/or section 810 and/or section 2261.

13 COST RECOVERY

14 54. Business and Professions Code section 125.3
15 provides, in pertinent part, that the Board may request the
16 administrative law judge to direct the licentiate found to have
17 committed a violation or violations of the licensing act to pay a
18 sum not to exceed the reasonable costs of investigation and
19 enforcement of the case.

20 PRAYER

21 WHEREFORE, complainant requests that the Board hold a
22 hearing upon the charges and allegations herein and thereafter
23 issue an order as follows:

- 24 1. Revoking the probationary order in Case No. D-
25 3800;
- 26 2. Imposing the revocation previously stayed in Case
27 No. D-3800 and suspending or revoking physician and surgeon's

1 certificate No. A-024412 issued to George Demetrius Karalis;

2 3. Ordering respondent to pay the reasonable costs of
3 investigation and enforcement of this matter; and

4 4. Such other and further action by the Board in this
5 matter as the Board deems just and proper.

6 DATED: JUNE 1, 1995

7

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10

DIXON ARNETT
Executive Officer
Medical Board of California
State of California

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Complainant

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EXHIBIT A

WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

(OPENING LIEN)

CASE NO. _____

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN

GEORGE DEMETRIUS KARALIS,
M.D., INC.

235 EL CAMINO DEL MAR
SAN FRANCISCO, CA 94121-1114

G.A. VS. LIEN CLAIMANT

860 BUSH ST. #305
SAN FRANCISCO, CA 94108

F.M. PRODUCTIONS

3775 BAYSHORE BLVD.
BRISBANE, CA 94005

INDUSTRIAL INDEMNITY

P.O. Box 7365
SAN FRANCISCO, CA 94120

The undersigned hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of

- Fifteen thousand eight hundred thirty five Dollars (\$15,835.00) only against

any amount now due or which may hereafter become payable as compensation to

on account of injury sustained by him on CUMULATIVE

G.A.

This request and claim for lien is for: (Mark appropriate box)

- The reasonable expense incurred by or on behalf of said employee for medical treatment to cure or relieve from the effects of said injury; or
- The reasonable medical expense incurred to prove a contested claim; or
- The reasonable value of living expenses of said employee or of his dependents, subsequent to the injury, or
- The reasonable living expenses of the wife or minor children, or both, of said employee, subsequent to the date of injury, where such employee has deserted or is neglecting his family; or
- The reasonable fee for interpreter's services performed on _____

Med. services are continuing.

NOTE: ITEMIZED STATEMENTS MUST BE ATTACHED

The undersigned declares that he delivered or mailed a copy of this lien claim to each of the above-named parties on Service also on: Wm. Broadbeck, Esq.

1/0 SCHMIDT, HERLIHY
ATTORNEY FOR LIEN CLAIMANT
275 BATTERY ST. #1200
SAN FRANCISCO, CA 94111
ADDRESS OF ATTORNEY FOR LIEN CLAIMANT

03-05-91

George Demetrius Karalis
LIEN CLAIMANT

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation.

Hannah JORGENSEN, Esq.
4306 GEARY BLVD. #201
SAN FRANCISCO, CA 94118
ATTORNEY FOR EMPLOYEE

G.A.

DATE OF BIRTH: OCT. 7, 1958
EMPLOYEE
SOC. SEC. DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF INDUSTRIAL ACCIDENTS

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

Tax I.D. # 94-2312718

July 25, 1990

STATEMENT

G.A.

Patient: [REDACTED] (W.C.A.B. #)

Diagnosis: Depressive Disorder (DSM-3R code 311.00)

05-04-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION.	\$ 150.00
05-24-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
03-27-90	(code 99031) Mileage within metro San Francisco, computed on a travel- time basis. Travel from doctor's office to downtown S.F. to pick up patient in response to emergent call from Sierra Clinic (60 minutes)	\$ 180.00
03-27-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
03-27-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
03-27-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
03-27-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
03-27-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00

G.A.

[REDACTED] (OPENING STATEMENT)-Page 1

04-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
05-04-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-04-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-04-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-04-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-25-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-25-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-31-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-27-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. (3-day & 5-day reports)	\$ 75.00

G.A.

07-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-31-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 03-31-90	\$ 100.00
05-15-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 05-15-90	\$ 100.00
04-19-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min.. THIS VISIT LASTED 90 MINUTES.	\$ 130.00 \$ 130.00
05-08-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min.. THIS VISIT LASTED 90 MINUTES.	\$ 150.00 \$ 150.00
06-06-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min.. THIS VISIT LASTED 90 MINUTES.	\$ 150.00 \$ 150.00
07-18-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min.. THIS VISIT LASTED 90 MINUTES.	\$ 150.00 \$ 150.00
03-27-90	(code 90803) Psychotherapy-45 min. (code 90803) Psychotherapy-45 min. (code 90803) Psychotherapy-45 min. (code 90803) Psychotherapy-45 min. THIS VISIT LASTED 180 MINUTES.	\$ 130.00 \$ 130.00 \$ 130.00 \$ 130.00
04-27-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min.. (code 90875) Hypnotherapy-45 min.. (code 90876) Hypnotherapy-25 min. THIS VISIT LASTED 160 MINUTES.	\$ 130.00 \$ 130.00 \$ 130.00 \$ 80.00

G.A.

05-16-90 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90876) Hypnotherapy-25 min. \$ 100.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
THIS VISIT LASTED 120 MINUTES.

03-27-90 (code 99080) Review of patient's
records (60 minutes) \$ 180.00

FEES CHANGED on 05-01-90

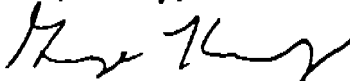
NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 4875.⁰⁰

Very truly,



George D. Karalis, M.D., M.P.H.

G.A.

(OPENING STATEMENT)-Page 4

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

03-04-91

Tax I.D. # 94-2312718

STATEMENT

G.A.
Patient: [REDACTED] (W.C.A.B. # [REDACTED])
(Soc. Sec. # [REDACTED])

Diagnosis: Depressive Disorder (311.00)

09-14-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
09-20-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
09-26-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
09-27-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
10-04-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
10-05-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
11-28-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
09-18-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-20-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00

G.A. 03-04-91

[REDACTED] CLOSING STATEMENT-Page 1

10-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-22-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-22-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-22-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-22-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-22-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-22-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-22-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

G.A.

██████ CLOSING STATEMENT-Page 2

03-04-91

10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-09-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

G.A.

CLOSING STATEMENT-Page 3

03-04-91

11-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

G.A.

██████████ CLOSING STATEMENT-Page 4

03-04-91

12-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-03-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-03-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-03-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

G.A.

██████ CLOSING STATEMENT-Page 5

03-04-91

01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-13-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-13-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-13-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-01-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-09-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 07-09-90.	\$ 100.00
08-13-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 08-13-90.	\$ 100.00
09-27-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 09-27-90.	\$ 100.00
11-11-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 11-11-90.	\$ 100.00
12-26-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 12-26-90.	\$ 100.00
02-09-91	(code 99080) Medical status report preparation. Reports required under	

G.A.

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03-04-91

Sect. 9785 of Calif. Admin. Code,
Title 8. Report dated 02-09-91. \$ 100.00

08-30-90 (code 90899) Review of medical
literature and/or research materials
re: psychopharmacotherapy and/or
diagnosis or treatment (120 minutes) \$ 400.00

08-10-90 (code 99080) Medical report \$ 100.00

10-04-90 (code 99080) Medical report \$ 100.00

02-06-91 (code 99080) Medical report \$ 100.00

07-26-90 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
THIS VISIT LASTED 90 MINUTES.

07-30-90 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
THIS VISIT LASTED 90 MINUTES.

08-30-90 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
THIS VISIT LASTED 90 MINUTES.

09-07-90 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
THIS VISIT LASTED 90 MINUTES.

11-12-90 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
THIS VISIT LASTED 90 MINUTES.

02-06-91 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
THIS VISIT LASTED 90 MINUTES.

G.A.

CLOSING STATEMENT-Page 7

03-04-91

08-10-90 (code 90875) Hypnotherapy-45 min.. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00

THIS VISIT LASTED 90 MINUTES.

08-16-90 (code 90875) Hypnotherapy-45 min.. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00

THIS VISIT LASTED 90 MINUTES.

08-22-90 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90875) Hypnotherapy-45 min.. \$ 150.00
(code 90876) Hypnotherapy-25 min.. \$ 100.00

THIS VISIT LASTED 120 MINUTES.

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$

Very truly,

 M.D. MPH

George D. Karalis, M.D., M.P.H.

G.A.

CLOSING STATEMENT-Page 8

03-04-91

EXHIBIT B

WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

THIS IS THE ONLY LIEN THAT WILL BE FILED

SFO 0351837 (OPENING LIEN) CASE NO. _____

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN

GEORGE KARALIS, M.D., INC.

235 EL CAMINO DEL MAR SAN FRANCISCO, CA 94121-1111

VS. LIEN CLAIMANT

[REDACTED] C.B. EMPLOYEE

9425 PEACH ST. #4 OAKLAND, CA 94603 ADDRESS

WELLS FARGO BANK

155 5th St. SAN FRANCISCO, CA 94103 ADDRESS

ATTN: SHARON FORD EMPLOYER

INDUSTRIAL INDEMNITY

P.O. Box 7800 SAN FRANCISCO, CA 94112 ADDRESS

The undersigned hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of

- Eleven thousand three hundred forty Dollars (\$ 11340.00) against

any amount now due or which may hereafter become payable as compensation to [REDACTED] EMPLOYEE

on account of injury sustained by him on CUMULATIVE DATE

C.B.

This request and claim for lien is for: (Mark appropriate box)

- ☑ The reasonable expense incurred by or on behalf of said employee for medical treatment to cure or relieve from the effects of said injury; or
☐ The reasonable medical expense incurred to prove a contested claim; or
☐ The reasonable value of living expenses of said employee or of his dependents, subsequent to the injury, or
☐ The reasonable living expenses of the wife or minor children, or both, of said employee, subsequent to the date of injury, where such employee has deserted or is neglecting his family; or
☐ The reasonable fee for interpreter's services performed on _____ DATE

Med. services are continuing.

NOTE: ITEMIZED STATEMENTS MUST BE ATTACHED

The undersigned declares that he delivered or mailed a copy of this lien claim to each of the above-named parties on

04-30-91

ATTORNEY FOR LIEN CLAIMANT

DATE

George Dent Karalis MD LIEN CLAIMANT

ADDRESS OF ATTORNEY FOR LIEN CLAIMANT

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation.

HANNAH JORGENSEN, ESQ. 4306 GEARY BLVD. #201

ATTORNEY FOR EMPLOYEE

SAN FRANCISCO, CA 94118

[REDACTED] EMPLOYEE

DEPARTMENT OF INDUSTRIAL RELATIONS DIVISION OF INDUSTRIAL ACCIDENTS

George De)trius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

Tax I.D. # 94-2312718

July 26, 1990

STATEMENT

Patient: *C.B.* [REDACTED] (W.C.A.B. # [REDACTED])

Diagnosis: Major Depression (DSM-3R code 296.23)

05-24-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION.	\$ 150.00
05-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-23-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
06-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
06-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-18-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-17-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. (3-day & 5-day reports)	\$ 100.00
06-08-90	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00

THIS VISIT LASTED 90 MINUTES.

C.B.

[REDACTED] (OPENING STATEMENT)-Page 1

05-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-17-90	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90803) Psychotherapy-45 min..	\$ 150.00
	(code 90806) Psychotherapy-25 min.	\$ 100.00
	THIS VISIT LASTED 120 MINUTES.	
07-26-90	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
07-26-90	(code 99080) Medical report	\$ 100.00

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 2190.00

George D. Karalis
George D. Karalis, M.D., M.P.H.
C.B.

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

March 29, 1991

Tax I.D. # 94-2312718

STATEMENT

C.B.
Patient: [REDACTED] (W.C.A.B. # unassigned)
(SSN # [REDACTED])

Diagnosis: Major Depression 296.23

07-09-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 07-09-90.	\$ 100.00
08-13-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 08-13-90.	\$ 100.00
09-27-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 09-27-90.	\$ 100.00
11-11-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 11-11-90.	\$ 100.00

C.B.

[REDACTED] STATEMENT (03-29-91)-Page 1

12-26-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 12-26-90.	\$ 100.00
02-09-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 02-09-91.	\$ 100.00
03-26-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 03-26-91.	\$ 100.00
08-06-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-06-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-06-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-06-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-13-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-13-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00

C.B.

08-27-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-05-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-05-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-05-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-05-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-12-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-12-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-12-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-12-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-12-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-20-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-20-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-20-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-20-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-20-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
09-20-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
		\$ 70.00

C.B.

10-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-23-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-23-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-23-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-23-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-23-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-23-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
10-29-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-01-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-01-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-01-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-01-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-01-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-01-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-08-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-14-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00

C.A.

11-14-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-14-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-14-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-14-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
11-14-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-03-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-03-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-03-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
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12-03-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-03-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-17-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
C.B.		

12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
12-24-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
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01-11-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
01-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00

C.B.

02-07-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-14-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-26-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
08-21-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
09-05-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
10-02-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
11-08-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
01-03-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
01-24-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
02-21-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
08-01-90	(code 90899) Review of medical literature and/or research materials re: psychopharmacotherapy and/or diagnosis or treatment (90 minutes)	\$ 300.00
10-29-90	(code 99080) Medical report	\$ 100.00
01-11-91 <i>C.B.</i>	(code 99080) Medical report	\$ 100.00

01-14-91	(code 99080) review of medical records (180 minutes)	\$ 600.00
08-21-90	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$

By Kt MD MPH

George D. Karalis, M.D., M.P.H.

STATEMENT SUMMARY

OPENING STATEMENT (07-26-90) = \$ 2190.00
 THIS STATEMENT = \$ 9150.00

 TOTAL DUE TO DATE = \$ 11,340.00

C.B.

EXHIBIT C

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
WORKERS' COMPENSATION APPEALS BOARD

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN ID OR CASE NO.

(Print or type names and addresses; include ZIP Codes) P.E. 685 14th St.
SAN FRANCISCO, CA 94114

Injured Worker Cumulative Address 14th St 1411-07-46

Date of Claimed Injury _____ Social Security Number _____ Date of Birth _____
Attorney for Injured Worker Rosemary ACKERMAN / 220 MONTGOMERY ST. #417 / SAN FRANCISCO 94104

Employer RIKKERS LIQUORS 2077 MARKET ST. / SAN FRANCISCO 94114

Insurance Carrier or, if Self-Insured, Certificate Name STATE COMP. INSUR. FUND Address P.O. Box 807
SAN FRANCISCO, CA 94101-0807
Address Where Claim Administered

Adjusting Agency, if Agency Administered _____

Attorney for Employer/Carrier GEORGE KARALIS, M.D., INC. 235 EL CAMINO DEL MAR / SAN FRANCISCO 94121-1114
Lien Claimant NONE Address and Telephone No. (415) 668-6634
Attorney for Lien Claimant _____ Address and Telephone No. _____

The lien claimant hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of THREE THOUSAND NINE HUNDRED EIGHTY Dollars (\$ 3980.00) against any amount now due or which may hereafter become payable as compensation to the above named worker on account of the above claimed injury.

This request and claim for lien is for (Mark appropriate box):

- The reasonable expense incurred by or on behalf of said worker for medical treatment to cure or relieve from the effects of said injury; or
- The reasonable medical expense incurred to prove a contested claim; or
- The reasonable value of living expenses of said worker or of his or her dependents, subsequent to the injury, or
- The reasonable living expenses of the spouse or minor children, or both, of said worker, subsequent to the date of injury, where such worker has deserted or is neglecting his or her family; or
- The reasonable fee for interpreter's services performed on _____, 19____.
-

NOTE: ITEMIZED STATEMENT JUSTIFYING THE LIEN MUST BE ATTACHED
FOR INJURIES OCCURRING ON OR AFTER JANUARY 1, 1990, FOR WHICH THE LIEN CLAIMANT DOES NOT HAVE A WCAB IDENTIFICATION NUMBER, the lien claimant declares under penalty of perjury that:
 a copy of the original completed Employee's Claim for Workers' Compensation Benefits (DWC Form 1) is attached, or
 the lien claimant does not have a copy of the claim form, but made the following efforts to secure one:
The parties have not responded to my written request for Form DWK-1

A copy of the lien claim and supporting documents was served by mail or delivered to each of the above-named parties.
Signature of Attorney for Lien Claimant Hence Karalis MD Signature of Lien Claimant _____ Date 06-06-91

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation.

Signature of Attorney for Injured Worker _____ Signature of Injured Worker _____

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

05-22-91

Tax I.D. # 94-2312718

STATEMENT

P.E.

Patient: [REDACTED] (W.C.A.B. # [REDACTED])
(Soc. Sec. # [REDACTED])

Diagnosis: Post-traumatic Stress Disorder 309.89

02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-22-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-22-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-22-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00
02-26-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 70.00

P.E.

02-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-28-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-28-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-28-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-28-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-28-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-08-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-21-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-21-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-21-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-21-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-27-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-27-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
04-05-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
04-05-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

SALE
JUN 7 1991

P.E.

04-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
04-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
04-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
04-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
04-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
04-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-09-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-10-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-10-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-23-91	(code 99080) DOCTORS FIRST REPORT	\$ 100.00
02-23-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Reports dated 02-23-91 & 02-21-91 (3 & 5 day reports).	\$ 100.00
03-26-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 03-26-91.	\$ 100.00
05-10-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 05-10-91.	\$ 100.00
02-23-91 P.E.	(code 90805) Psychotherapy-45 min.	\$ 150.00

02-28-91 (code 90805) Psychotherapy-45 min. \$ 150.00
(code 90805) Psychotherapy-45 min. \$ 150.00
THIS VISIT LASTED 90 MINUTES.

02-23-91 (code 99031) Mileage within metropolitan
San Francisco to patient's home,
computed on a travel-time basis. Travel
time = 60 minutes at \$ 150 per 45
minutes) \$ 200.00

02-28-91 (code 99031) Mileage within metropolitan
San Francisco to patient's home,
computed on a travel-time basis. Travel
time = 60 minutes at \$ 150 per 45
minutes) \$ 200.00

The patient also broke one appointment, which is not being billed.

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 3980.⁰⁰

Very truly,

George D. Karalis
George D. Karalis, M.D., M.P.H.

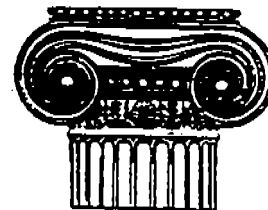
P.E.

EXHIBIT D

GEORGE DEMETRIUS KARALIS, M.D., M.P.H.

A Professional Corporation

Psychiatry, Stress Control, Psychosomatic Medicine and Pain Disorders



04-18-91

Yvonne Means--HUMAN RESOURCES
CP National Alltell
2121 N. California Blvd. #400
Walnut Creek, CA 94596

Cincinnati Insur. Co.
c/o CRAWFORD & CO.
P.O. Box 429
San Leandro, CA 94577

P.H.

RE: Lien in [REDACTED] v. C.P. Alltell (WCAB # unassigned)

69672 MSH

Dear Gentlepersons:

Enclosed please find an Opening and Closing Statement for services rendered to the above claimant. The final total is \$ 11,300.00.

I expended a great deal of effort to treat this patient for her AOE/COE job stress. A fair reading of the evidence supports a finding that stresses at CP ultimately caused this patient to decompensate. While I realize that defendants wish to cut costs, it must be remembered that the purpose of the workers comp. program is to help the patient again become medically and mentally whole.

I employ counsel to settle liens, and at times assign liens to BOEHM & ASSOCIATES or to LIEN COLLECTIONS INC. for enforcement of collections. Before so referring, I am open to reasonable discussion for settlement. I hereby offer to settle this lien in full for 90% of the face value (\$ 11,300.00 x 90% = \$ 10,170.00). This offer is made in good faith, and lapses 21 days from the date of this letter. After that period, a DOR must be filed to enforce collections.

Very truly,

George Karalis M.D. M.P.H.

George Karalis, M.D., M.P.H.

Copy: Robert Blumenthal, Esq.

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

October 26, 1990

Tax I.D. # 94-2312718

STATEMENT

Patient: *P.H.* [REDACTED] (W.C.A.B. # [REDACTED])
(Soc. Sec. # [REDACTED])

Diagnosis: Depressive Disorder (311.00)

10-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-25-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-24-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Reports dated 10-24-90 & 10-26-90 (3-day & 5-day letters)	\$ 100.00

P.H.

[REDACTED] OPENING LIEN-Page 1

10-26-90	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90811) Psychotherapy-15 min.	\$ 70.00

@ aff 14
 } P 515. 2nd Rec
 (PH)

THIS VISIT. LASTED 195 MINUTES.

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 1190.00

Very truly,

George D. Karalis MD MPH
 George D. Karalis, M.D., M.P.H.

P. H.

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

04-18-91

Tax I.D. # 94-2312718

P.H. STATEMENT

Patient: [REDACTED] (W.C.A.B. # [REDACTED])
(SSN # [REDACTED])

Diagnosis: Depressive Disorder (311.00)

01-08-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
01-30-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
02-13-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
02-26-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
03-26-91	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 150.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

5-6-91 4/5/91
TELE SESSION SCHED.
PT WASHED THEM.
-NO SHOW @ alt
"LATE from work
KI call cancel.
B & N
PT came in 45 min late
40 min 3/10/91
PT missed 3/10/91
NOTE - CALL XG

P.H.

[REDACTED] CLOSING STATEMENT-Page 1

11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-02-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-21-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-21-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-21-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-21-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-21-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-21-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

P.H.

CLOSING STATEMENT-Page 2

11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

P.H.

12-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-19-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-02-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-02-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-02-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-02-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-02-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

P. H.

01-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
01-31-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-07-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-07-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-07-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-07-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-13-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-18-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

P. H.

03-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-11-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 11-11-90.	\$ 100.00
12-26-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 12-26-90.	\$ 100.00
02-09-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 02-09-91.	\$ 100.00
03-26-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 03-26-91.	\$ 100.00

P.H.

03-29-91	(code 90899) Review of medical literature and/or research materials re: psychopharmacotherapy and/or diagnosis or treatment (135 minutes)	\$ 450.00	
10-26-90	(code 99080) Medical report	\$ 100.00	
02-26-91	(code 99080) Medical report	\$ 100.00	
03-23-91	(code 99080) review of medical records (45 minutes)	\$ 150.00	
11-09-90	(code 90875) Hypnotherapy-45 min..	\$ 150.00	} CURE PT!
	(code 90875) Hypnotherapy-45 min..	\$ 150.00	
	THIS VISIT LASTED 90 MINUTES.		
02-26-91	(code 90803) Psychotherapy-45 min.	\$ 150.00	
	(code 90875) Hypnotherapy-45 min..	\$ 150.00	
	THIS VISIT LASTED 90 MINUTES.		

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 10,110. 00

Very truly,

George D. Karalis M.D. MPH

George D. Karalis, M.D., M.P.H.

P.H.

██████████ CLOSING STATEMENT-Page 8

02-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-22-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-22-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-06-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-06-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-06-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-06-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
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03-11-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
03-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

P. H.

CLOSING STATEMENT-Page 6

1 DANIEL E. LUNGREN, Attorney General
 of the State of California
 2 ISA R. RODRIGUEZ
 Deputy Attorney General
 3 2101 Webster Street, 12th Floor
 Oakland, CA 94612-3049
 4 Telephone: (510) 286-4042

5 Attorneys for Complainant

6
 7 BEFORE THE DIVISION OF MEDICAL QUALITY
 MEDICAL BOARD OF CALIFORNIA
 8 STATE OF CALIFORNIA

10	In the Matter of the Accusation)	No. D1-90-3188
	and Petition to Revoke Probation)	
11	Against:)	FIRST SUPPLEMENTAL
)	ACCUSATION AND PETITION
12	GEORGE DEMETRIUS KARALIS, M.D.)	<u>TO REVOKE PROBATION</u>
	233 El Camino Del Mar)	
13	San Francisco, CA 94121)	
	Physician and Surgeon)	
14	Certificate No. A-024412,)	
)	
15	Respondent.)	
)	
16)	

17
 18 DIXON ARNETT, for further causes for discipline
 19 alleges:

- 20 1. Complainant Dixon Arnett makes and files this First
 21 Supplemental Accusation and Petition to Revoke Probation solely
 22 in his official capacity as Executive Director of the Medical
 23 Board of California.
- 24 2. The allegations of paragraphs 2 through 54 of the
 25 Accusation and Petition to Revoke Probation heretofore filed are
 26 realleged and incorporated herein by reference as if fully set
 27 forth.

FACTS RE: PATIENT M.L.

1
2 3. On or about September 21, 1990, through on or about
3 December 14, 1992, respondent undertook to care for and treat
4 M.L., a female adult. The treatment was provided and paid for
5 through M.L.'s Workers' Compensation carrier pursuant to a claim
6 made for work-related stress. Respondent diagnosed M.L. as
7 suffering from major depressive disorder (DSM Code 296.23).^{1/}

8 4. Respondent treated M.L. with psychotherapy and
9 hypnotherapy. According to respondent's records, there were
10 approximately 29 office visits with M.L. at respondent's office
11 usually of 45 minutes duration and approximately 13 telephone
12 appointments, between September 26, 1990, and July 23, 1991,
13 ranging in length from 15 minutes to 120 minutes. These
14 telephone appointments were billed in 15 minute increments at a
15 rate of \$70.00 per 15 minutes in 1990 and at a lower rate of
16 \$50.00 per 15 minutes in 1991. There were also a number of
17 billings for medical records review and for treatment progress
18 reports to the carrier. True and correct copies of respondent's
19 insurance billings to Industrial Indemnity and to the Travelers,
20 M.L.'s Workers' Compensation carriers, are attached hereto as
21 Exhibit E and incorporated herein by reference.

22 5. Respondent's treatment of M.L., whether on the
23 telephone or in respondent's office, consisted of primarily
24 listening to relaxation tapes for periods ranging from 15 minutes
25 to 120 minutes. Each tape was about 15 minutes in length, and
26

27 1. DSM means Diagnostic and Statistical Manual of Mental
Disorders.

1 respondent changed the tape every 15 minutes, talking to the
2 patient briefly between tapes. There was little if any
3 discussion therapy. Respondent's patient records are unclear
4 about the degree of resolution of M.L.'s symptoms, the date she
5 resumed working, or the reason for discontinuing treatment.

6 FIRST CAUSE FOR DISCIPLINARY
7 ACTION AND REVOCATION OF PROBATION

8 6. Respondent's conduct in treating patient M.L., as
9 described above, constitutes unprofessional conduct, gross
10 negligence and/or repeated acts of negligence, and/or
11 incompetence and is in violation of condition (7) of his present
12 probation in that:

13 a. He failed to adequately diagnose M.L.'s
14 condition, as reflected in his medical record, which
15 does not contain adequate information upon which to
16 base a diagnosis. It is not possible to treat an
17 acutely ill patient without intensive, in person,
18 discussion therapy. M.L. presented to respondent as
19 suffering from a major depression, and yet there was no
20 indication that appropriate treatment was provided for
21 this symptom.

22 b. He failed to provide M.L. with competent
23 treatment for M.L.'s condition. There were no progress
24 notes indicating the rationale for the treatment
25 prescribed and no notations of the appropriateness and
26 effectiveness of interventions as treatment proceeded.

27 c. Respondent exploited patient M.L. in order to

1 maximize billings to the insurance carrier rather than
2 to provide optimal care for the patient's clinical
3 condition.

4 7. Therefore, cause exists for disciplinary action
5 and revocation of respondent's probation pursuant to sections
6 2234, and/or 2234(a), and/or (b) and/or (c).

7 SECOND CAUSE FOR DISCIPLINARY
8 ACTION AND REVOCATION OF PROBATION

9 8. Respondent's conduct in treating patient M.L., as
10 described above, constitutes acts of dishonesty and corruption,
11 presenting a false claim for the payment of a loss under a
12 contract of insurance, and/or knowingly making or signing a
13 document directly related to the practice of medicine which
14 falsely represents the existence or non-existence of a state of
15 facts and is in violation of condition (7) of his present
16 probation in that:

17 a. His medical record for M.L. fails to
18 reflect that the treatment for which the patient's
19 insurance was billed was actually provided. There is
20 no clinical information provided in the record which
21 evidences so many hours of psychotherapy and/or
22 hypnotherapy either in the office or on the telephone.
23 In addition, the patient indicates that respondent did
24 not speak with him for more than a few minutes on any
25 given appointment day. Respondent billed for the time
26 the patient spent listening to audio tapes, rather than
27 time he actually spent in clinical interaction with the

1 patient.

2 b. His medical record for M.L. fails to
3 substantiate hours billed for "medical research" and
4 "records review."

5 c. Respondent billed \$100.00 each for "medical
6 reports" which consisted of nothing more than short
7 answers to a few questions.

8 d. Respondent manipulated G.A. for the goals of
9 payment rather than the goals of treatment.

10 e. Respondent's record for M.L. fails to justify
11 a work-related injury.

12 f. Respondent billed the Workers' Compensation
13 carrier for psychotherapy and/or hypnotherapy when in
14 truth and in fact, he was not providing them to nearly
15 the extent billed in that the "services" primarily
16 consisted of the playing of audio tapes for the patient
17 over the period of the alleged psychotherapy session.

18 9. Therefore, cause exists for disciplinary action
19 and revocation of respondent's probation pursuant to section 2234
20 through sections 2234(e) and/or section 810 and/or section 2261.

21 **THIRD CAUSE FOR DISCIPLINARY**
22 **ACTION AND REVOCATION OF PROBATION**

23 10. Respondent's conduct in treating M.L., as
24 described above, constitutes clearly excessive administration of
25 treatment by the standards of the community of licensees, and
26 therefore cause exists for disciplinary action and revocation of
27 respondent's probation pursuant to section 2234 through section

1 725.

2 FACTS RE: PATIENT E.F.

3 11. On or about October 27, 1989, through on or about
4 February 21, 1991, respondent undertook to care for and treat E.
5 F., a female adult. The treatment was provided and paid for
6 through E.F.'s workers' compensation carrier pursuant to a claim
7 made for work-related stress. E.F. presented with complaints of
8 panic, headaches, joint pains, and an inability to cope with
9 every day stress. Respondent diagnosed generalized anxiety
10 disorder (DSM 300.02) and psychological factor affecting physical
11 condition (DSM 316.03).

12 12. Respondent treated E.F. with psychotherapy and
13 hypnotherapy. E.F.'s patient records indicate that E.F. was
14 seen, in person, by respondent, on October 31, 1989, November 6,
15 1989, and December 4, 1989. All of the treatment for the
16 subsequent fourteen months was provided over the telephone. The
17 telephone therapy sessions ranged in length from 15 minutes to
18 150 minutes and were billed in 15-minute increments at a rate of
19 \$39.36 per 15 minutes until December 1989 when the rate increased
20 to \$50.00 per 15-minute increment. In May 1990, the rate again
21 increased to \$70.00 per 15-minute increment. Respondent also
22 charged for missed appointments without adequate notice and had
23 billings for medical status reports and for review of medical
24 literature. True and correct copies of respondent's insurance
25 billings to Industrial Indemnity, E.F.'s workers' compensation
26 carrier, are attached hereto as Exhibit F and incorporated herein
27 by reference.

1 13. According to E.F., respondent's billings do not
2 accurately reflect the number of telephone sessions and appear to
3 be far in excess of the actual number.

4 14. Respondent's treatment of E.F., whether on the
5 telephone or in respondent's office, consisted of primarily
6 listening to relaxation tapes for periods ranging from 15 minutes
7 to 150 minutes. Each tape was about 15 minutes in length, and
8 respondent changed the tape every 15 minutes, talking to the
9 patient briefly between tapes. There was little if any
10 discussion therapy. Respondent's patient records are unclear
11 about the degree of resolution of E.F.'s symptoms, the date she
12 resumed working, or the reason for discontinuing treatment.

13 FOURTH CAUSE FOR DISCIPLINARY
14 ACTION AND REVOCATION OF PROBATION

15 15. Respondent's conduct in treating patient E.F., as
16 described above, constitutes unprofessional conduct, gross
17 negligence and/or repeated acts of negligence, and/or
18 incompetence and is in violation of condition (7) of his present
19 probation in that:

20 a. He failed to adequately diagnose E.F.'s condition,
21 as reflected in his medical records, which does not contain
22 adequate information upon which to base a diagnosis. It is
23 not possible to treat an acutely ill patient without
24 intensive, in person, discussion therapy. E.F. presented
25 with general anxiety disorder and patient records indicate
26 suicidal ideation and personality disorganization, and yet
27 there was no indication that appropriate treatment was

1 provided for these symptoms.

2 b. He failed to provide E.F. with competent treatment
3 for E.F.'s condition. There were no progress notes
4 indicating the rationale for the treatment prescribed and no
5 notations of the appropriateness and effectiveness of
6 interventions as treatment proceeded.

7 c. Respondent exploited patient E.F. in order to
8 maximize billings to the insurance carrier rather than to
9 provide optimal care to the patient's clinical condition.

10 16. Therefore, cause exists for disciplinary action
11 and revocation of respondent's probation pursuant to sections
12 2234, and/or 2234(a), and/or (b) and/or (c).

13 FIFTH CAUSE FOR DISCIPLINARY
14 ACTION AND REVOCATION OF PROBATION

15 17. Respondent's conduct in treating patient E.F., as
16 described above, constitutes acts of dishonesty and corruption,
17 presenting a false claim for the payment of a loss under a
18 contract of insurance, and/or knowingly making or signing a
19 document directly related to the practice of medicine which
20 falsely represents the existence or non-existence of a state of
21 facts and is in violation of condition (7) of his present
22 probation in that:

23 a. He billed the insurance carrier repeatedly for
24 broken appointments with E.F., when either the appointments
25 did not exist or were not missed. It is unethical to bill
26 repeatedly for missed appointments even if they were missed.
27 On several occasions, as shown in Exhibit F, respondent

1 billed for both missed appointments and telephone
2 consultations on the same date.

3 b. His medical record for E.F. fails to reflect that
4 the treatment for which the patient's insurance was billed
5 was actually provided. There is no clinical information
6 provided in the record which evidences so many hours of
7 psychotherapy and/or hypnotherapy either in the office or on
8 the telephone. In addition, the patient indicates that
9 respondent did not speak with her for more than a few
10 minutes on any given appointment day. Respondent billed for
11 the time the patient spent listening to audio tapes, rather
12 than time he actually spent in clinical interaction with the
13 patient.

14 c. His medical record for E.F. fails to substantiate
15 hours billed for "review of medical literature and/or
16 research materials."

17 d. Respondent billed \$100.00 each for "medical status
18 reports" which consisted of nothing more than short answers
19 to a few questions.

20 e. Respondent billed for services for which no true,
21 prior appointment had been made. Respondent could produce no
22 appointment log which indicated that such appointments were
23 made, and E.F. indicates that the telephone contacts were
24 not arranged in advance.

25 f. Respondent manipulated E.F. for the goals of
26 payment rather than the goals of treatment.

27 g. Respondent's record for E.F. fails to justify a

1 work-related injury.

2 h. Respondent billed the workers' compensation carrier
3 for psychotherapy and/or hypnotherapy when in truth and in
4 fact, he was not providing such services or not providing
5 them to nearly the extent billed in that the "services"
6 primarily consisted of the playing of audio tapes for the
7 patients over the period of the alleged psychotherapy
8 session.

9 18. Therefore, cause exists for disciplinary action
10 and revocation of respondent's probation pursuant to section 2234
11 through sections 2234(e) and/or section 810 and/or section 2261.

12 SIXTH CAUSE FOR DISCIPLINARY
13 ACTION AND REVOCATION OF PROBATION

14 19. Respondent's conduct in treating E.F., as
15 described above, constitutes clearly excessive administration of
16 treatment by the standards of the community of licensees, and
17 therefore cause exists for disciplinary action and revocation of
18 respondent's probation pursuant to section 2234 through section
19 725.

20 FACTS RE: PATIENT V.B.

21 20. On or about July 30, 1991, through on or about
22 April 14, 1992, respondent undertook to care for and treat V.B.,
23 a female adult. The treatment was provided and paid for through
24 V.B.'s workers' compensation carrier pursuant to a claim made for
25 work-related stress. V.B. presented with panic attacks, most
26 extreme anxiety, and in-patient level of depression. Respondent
27 diagnosed generalized anxiety disorder (DSM 300.02), major

1 depression (DSM 296.23), and panic disorder (DSM 300.01), and
2 prescribed Desipramine and Buspar.

3 21. Respondent treated V.B. with psychotherapy,
4 hypnotherapy, and prescription medications. On July 26, 1991 and
5 on July 30, 1991, V.B.'s treatment was by telephone. The
6 telephone sessions were 45 minutes and 1 hour, respectively, and
7 were billed in 15-minute increments at a rate of \$70.00 per 15
8 minutes. Thereafter, all sessions were in-person appointments.
9 There were also a number of billings for medical status reports
10 and medical records review. True and correct copies of
11 respondent's insurance billings to the Chubb Group, V.B.'s
12 workers' compensation carrier are attached as Exhibit G and
13 incorporated herein by reference.

14 22. Respondent's treatment of V.B. on the telephone
15 consisted of primarily listening to relaxation tapes for periods
16 ranging from 15 minutes to 120 minutes. Each tape was about 15
17 minutes in length, and respondent changed the tape every 15
18 minutes, talking to the patient briefly between tapes. There was
19 little, if any, discussion therapy. Respondent's patient records
20 are unclear about the degree of resolution of V.B.'s symptoms,
21 the date she resumed working, or the reason for discontinuing
22 treatment.

23 SEVENTH CAUSE FOR DISCIPLINARY
24 ACTION AND REVOCATION OF PROBATION

25 23. Respondent's conduct in treating patient V.B., as
26 described above, constitutes unprofessional conduct, gross
27 negligence and/or repeated acts of negligence, and/or

1 incompetence and is in violation of condition (7) of his present
2 probation in that:

3 a. He failed to adequately diagnose V.B.'s condition,
4 as reflected in his medical record, which does not contain
5 adequate information upon which to base a diagnosis. V.B.
6 presented to respondent as suffering from a major depression
7 and panic disorder, and J.B.'s records indicate suicidal
8 ideation, and yet there was no indication that appropriate
9 treatment was provided for these symptoms.

10 b. He failed to provide V.B. with competent treatment
11 for V.B.'s condition. There were no progress notes
12 indicating the rationale for the treatment prescribed and no
13 notations of the appropriateness and effectiveness of
14 interventions as treatment proceeded.

15 c. 5 grams of Desipramine is the lethal dosage.
16 Nonetheless, respondent prescribed 100-50 mg. tablets of
17 Desipramine, the lethal dosage to M.L. on M.L.'s first
18 appointment. This was at a time when M.L. was a new,
19 seriously depressed patient whose impulses and suicidal
20 tendencies had not been adequately assessed.

21 d. Respondent exploited patient V.B. in order to
22 maximize billings to the insurance carrier rather than to
23 provide optimal care for the patient's clinical condition.

24 24. Therefore, cause exists to disciplinary action and
25 revocation of respondent's probation pursuant to sections 2234,
26 and/or 2234(a), and/or (b) and/or (c).

27 ///

EIGHTH CAUSE FOR DISCIPLINARY
ACTION AND REVOCATION OF PROBATION

1
2
3 25. Respondent's conduct in treating patient V.B., as
4 described above, constitutes acts of dishonesty and corruption,
5 presenting a false claim for the payment of a loss under a
6 contract of insurance, and/or knowingly making or signing a
7 document directly related to the practice of medicine which
8 falsely represents the existence or non-existence of a state of
9 facts and is in violation of condition (7) of his present
10 probation in that:

11 a. His medical record for V.B. fails to reflect that
12 the treatment for which the patient's insurance was billed
13 was actually provided. There is no clinical information
14 provided in the record which evidences so many hours of
15 psychotherapy and/or hypnotherapy either in the office or on
16 the telephone. In addition, the patient indicates that
17 respondent did not speak with her for more than a few
18 minutes on telephone sessions. Respondent billed for the
19 time the patient spent listening to audio tapes, rather than
20 time he actually spent in clinical interaction with the
21 patient.

22 b. His medical record for V.B. fails to substantiate
23 hours billed for "medical records review."

24 c. Respondent billed \$100.00 each for "medical status
25 report" and "medical report" which consisted of nothing more
26 than short answers to a few questions.

27 d. Respondent manipulated V.B. for the goals of

1 payment rather than the goals of treatment.

2 e. Respondent's record for V.B. fails to justify a
3 work-related injury.

4 f. Respondent billed 185 minutes of service on the
5 initial visit on July 30, 1991. This is an unprecedented
6 amount of time for an outpatient and would require
7 justification in the medical records. Such justification is
8 lacking.

9 26. Therefore, cause exists for disciplinary action
10 and revocation of respondent's probation pursuant to section 2234
11 through section 2234(e) and/or section 810 and/or section 2261.

12 NINTH CAUSE FOR DISCIPLINARY
13 ACTION AND REVOCATION OF PROBATION

14 27. Respondent's conduct in treating V.B., as
15 described above, constitutes clearly excessive administration of
16 treatment by the standards of the community of licensees, and
17 therefore cause exists for disciplinary action and revocation of
18 respondent's probation pursuant to section 2234 through section
19 725.

20 PRAYER

21 WHEREFORE, complainant requests that the Board hold a
22 hearing upon the charges and allegations herein and thereafter
23 issue an order as follows:

- 24 1. Revoking the probationary order in Case No. D-3800;
25 2. Imposing the revocation previously stayed in Case
26 No. D-3800 and suspending or revoking physician and surgeon's
27 certificate No. A-024412 issued to George Demetrius Karalis;

1 3. Ordering respondent to pay the reasonable costs of
2 investigation and enforcement of this matter; and

3 4. Such other and further action by the Board in this
4 matter as the Board deems just and proper.

5 DATED: June 22, 1995

6
7 

8 _____
9 DIXON ARNETT
10 Executive Officer
11 Medical Board of California
12 State of California

13
14 Complainant
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27

C:\ISA\KARLIS\FSA

WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

(OPENING LIEN)

CASE NO. OAK [REDACTED]

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN

235 EL CAMINO DEL MAR

GEORGE KARALIS, M.D., INC. SAN FRANCISCO, CA 94121-1114

[REDACTED] LIEN CLAIMANT M.L. [REDACTED] ADDRESS

BLUE CROSS EMPLOYEE 2101 WEBSTER ST. / OAKLAND, CA 94651
TAKE CARE (ATTN: Human Resources) P.O. Box 4059 / CONCORD, CA 94524-4059
EMPLOYER ADDRESS

ATLANTIC MUTUAL INSUR. 201 SPEAR ST. #1800 / SAN FRANCISCO, CA 94105
INSURANCE CARRIER ADDRESS

The undersigned hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of

Three thousand five hundred fifty Dollars (\$ 3550.00) against

any amount now due or which may hereafter become payable as compensation to [REDACTED] EMPLOYEE

on account of injury sustained by him on Cumulative DATE M.L.

This request and claim for lien is for: (Mark appropriate box)

- The reasonable expense incurred by or on behalf of said employee for medical treatment to cure or relieve from the effects of said injury; or
- The reasonable medical expense incurred to prove a contested claim; or
- The reasonable value of living expenses of said employee or of his dependents, subsequent to the injury, or
- The reasonable living expenses of the wife or minor children, or both, of said employee, subsequent to the date of injury, where such employee has deserted or is neglecting his family; or
- The reasonable fee for interpreter's services performed on _____ DATE

Med. services are continuing.

NOTE: ITEMIZED STATEMENTS MUST BE ATTACHED

The undersigned declares that he delivered or mailed a copy of this lien claim to each of the above-named parties on

ATTORNEY FOR LIEN CLAIMANT

01-29-91
DATE

ADDRESS OF ATTORNEY FOR LIEN CLAIMANT

George Demetri Karalis, MD
LIEN CLAIMANT

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation.

M.L.

Dwight F. Scott, Esq.
1615 BROADWAY #411

[REDACTED] EMPLOYEE

OAKLAND, CA. 94612
(415) 839-1388
DIA WCAB FORM 6 (REV. 8-75)

Doc. Sel [REDACTED]
DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF INDUSTRIAL ACCIDENTS

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

01-28-91

Tax I.D. # 94-2312718

STATEMENT

M.L.

Patient: [REDACTED] (W.C.A.B. [REDACTED])
(Soc. Sec. [REDACTED])

Diagnosis: Major Depression 296.23

09-26-90 (code 90855) Phone consult with
or about patient - 15 min. \$ 70.00

12-09-90 (code 90855) Phone consult with
or about patient - 15 min. \$ 70.00

12-09-90 (code 90855) Phone consult with
or about patient - 15 min. \$ 70.00

09-21-90 (code 99080) Medical status report
preparation. Reports required under
Sect. 9785 of Calif. Admin. Code,
Title 8. Reports dated 09-21-90
(3-day & 5-day letters) \$ 100.00

09-27-90 (code 99080) Medical status report
preparation. Reports required under
Sect. 9785 of Calif. Admin. Code,
Title 8. Report dated 09-27-90. \$ 100.00

11-11-90 (code 99080) Medical status report
preparation. Reports required under
Sect. 9785 of Calif. Admin. Code,
Title 8. Report dated 11-11-90. \$ 100.00

M.L.

12-26-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 12-26-90.	\$ 100.00
01-19-91	(code 99080) review of medical records (90 minutes)	\$ 300.00
10-19-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min..	\$ 150.00 \$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
11-02-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min..	\$ 150.00 \$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
11-30-90	(code 90803) Psychotherapy-45 min. (code 90875) Hypnotherapy-45 min..	\$ 150.00 \$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
09-21-90	(code 90803) Psychotherapy-45 min. (code 90806) Psychotherapy-25 min..	\$ 150.00 \$ 100.00
	THIS VISIT LASTED 75 MINUTES.	
10-05-90	(code 90875) Hypnotherapy-45 min.. (code 90875) Hypnotherapy-45 min..	\$ 150.00 \$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
10-12-90	(code 90875) Hypnotherapy-45 min.. (code 90875) Hypnotherapy-45 min..	\$ 150.00 \$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
10-26-90	(code 90875) Hypnotherapy-45 min.. (code 90875) Hypnotherapy-45 min..	\$ 150.00 \$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
11-09-90	(code 90811) Psychotherapy-15 min. (code 90875) Hypnotherapy-45 min..	\$ 70.00 \$ 150.00
	THIS VISIT LASTED 60 MINUTES.	

M.L.

11-23-90	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 70.00

THIS VISIT LASTED 105 MINUTES.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 3550.⁰⁰

Very truly,

George D. Karalis
George D. Karalis, M.D., M.P.H.

M.L.

WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

CASE NO. OAK 0178533

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN

235 EL CAMINO DEL MAR

GEORGE KARALIS, M.D., INC. SAN FRANCISCO, CA 94121-1114

VS. M.L. LIEN CLAIMANT

ADDRESS

BLUE CROSS → 2101 WEBSTER ST. / OAKLAND, CA 94659 ADDRESS

TAKE CARE → P.O. BOX 4059 / CONCORD, CA 94524-4059 ADDRESS

ATLANTIC MUTUAL → 201 SPEAR ST. #1800 / SAN FRANCISCO 94103 ADDRESS

INDUSTRIAL INDEMNITY → P.O. BOX 7365 / SAN FRANCISCO, CA 94120 ADDRESS

INSURANCE CARRIER

ADDRESS

The undersigned hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of

EIGHT THOUSAND SIX HUNDRED FIFTY Dollars (\$ 8650.00) against

any amount now due or which may hereafter become payable as compensation to M.L.

on account of injury sustained by him on CT 10-28-88 DATE

RECEIVED

MAY 8 1992

Division
Workers' Compensation
San Francisco

This request and claim for lien is for: (Mark appropriate box)

- The reasonable expense incurred by or on behalf of said employee for medical treatment to cure or relieve from the effects of said injury; or
- The reasonable medical expense incurred to prove a contested claim; or
- The reasonable value of living expenses of said employee or of his dependents, subsequent to the injury, or
- The reasonable living expenses of the wife or minor children, or both, of said employee, subsequent to the date of injury, where such employee has deserted or is neglecting his family; or
- The reasonable fee for interpreter's services performed on

(Amended) OPEN LIEN. THIS CLOSING LIEN

\$3550.00 + \$5100.00 = \$8650.00

Total Due

\$8650.00

NOTE: ITEMIZED STATEMENTS MUST BE ATTACHED

The undersigned declares that he delivered or mailed a copy of this lien claim to each of the above named parties on

05-07-92 DATE

ATTORNEY FOR LIEN CLAIMANT

DATE

ADDRESS OF ATTORNEY FOR LIEN CLAIMANT

George Karalis M.D. MPH LIEN CLAIMANT

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation.

M.L.

Daniel Levy, ESG
2001 WAYNE AV. #102

ATTORNEY FOR EMPLOYEE

EMPLOYEE

SAN LEANDRO, CA 94577

GEORGE DEMETRIUS KARALIS, M.D., M.P.H.
235 EL CAMINO DEL MAR
SAN FRANCISCO, CA 94121-1114
(415) 668-6634

Psychiatry

M.L.

RE: case of [REDACTED] v. BLUE CROSS
(W.C.A.B. case # OAK [REDACTED] (Soc. Sec. # [REDACTED]))

I ATTACH THIS STATEMENT TO MY BILLING BECAUSE MY FEES ARE JUSTIFIABLY IN EXCESS OF THE FEES SET FORTH IN THE OFFICIAL MEDICAL FEE SCHEDULE. THE REASONS WHY MY SERVICES SHOULD BE PAID AT A RATE IN EXCESS OF THE RATES IN THE OFFICIAL MEDICAL FEE SCHEDULE ARE AS FOLLOWS:

I CERTIFY THAT THE FEES FOR MY MEDICAL SERVICES ARE REASONABLE AND ARE NO GREATER THAN MY USUAL FEE FOR THE SAME SERVICES.

THE FEES I CHARGE, (E.G., \$ 150 PER 45-MINUTE PSYCHOTHERAPY OR HYPNOTHERAPY SESSION) ARE REASONABLE AND WITHIN THE RANGE OF PREVAILING FEES CHARGED BY SIMILAR PROVIDERS FOR SIMILAR SERVICES IN MY GEOGRAPHICAL AREA.

THERAPY FOR THIS PATIENT INVOLVED A NUMBER OF TELEPHONE CALLS WITH THE PATIENT OR OTHERS, WHICH CALLS ARE NOT AT ALL BEING BILLED FOR.

THERE WAS A SUBSTANTIAL AMOUNT OF TIME SPENT IN NECESSARY PROCEDURAL MATTERS IN THIS CASE (INVOLVING TELEPHONE CALLS AND/OR LETTERS/FORMS TO OR WITH DEFENSE'S AND/OR CLAIMANT'S COUNSEL/AGENTS AND/OR EMPLOYER AND/OR OTHER INTERESTED PRIVATE/PUBLIC ENTITIES. I AM NOT OTHERWISE BILLING FOR THE TIME OR EFFORT EXPENDED.

FOR VALID REASONS(SHE WORKS REGULAR HOURS AT SOUTHERN PACIFIC), THIS PATIENT REQUIRED SERVICES SOMETIMES TO BE RENDERED OTHER THAN DURING NORMAL BUSINESS HOURS (8 A.M. TO 6 P.M., MONDAY THROUGH FRIDAY).

RECEIVED

MAY 8 1992

Division
Workers' Compensation
San Francisco

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

05-05-92

Tax I.D. # 94-2312718

STATEMENT

Patient: *M. L.* [REDACTED] (W.C.A.B. # OAK [REDACTED])
(SSN # [REDACTED])

Diagnosis: Major Depression 296.25 (in partial remission)

04-03-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-03-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-03-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-03-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-17-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-17-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-17-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-17-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-17-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-17-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
04-24-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
<i>M. L.</i>	or about patient - 15 min.	\$ 50.00

[REDACTED] CLOSING LIEN-P. 1

RECEIVED
MAY-8 1992
Division
Workers' Compensation
San Francisco

05-20-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
05-20-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
05-20-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
05-22-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
05-22-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
07-01-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
07-23-91	(code 90855) Phone consult with or about patient - 15 min.	\$ 50.00
05-28-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
06-05-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
06-18-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
08-05-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 90 MINUTES.	
07-23-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
09-10-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
11-07-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
06-13-91	(code 90875) Hypnotherapy-45 min..	\$ 150.00
06-24-91	(code 90811) Psychotherapy-15 min.	\$ 50.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 60 MINUTES.	
01-08-92	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
02-19-92	(code 90806) Psychotherapy-25 min.	\$ 100.00
03-13-92	(code 90806) Psychotherapy-25 min.	\$ 100.00
05-25-91	(code 99080) Med. records review (90 min.)	\$ 300.00
05-10-91	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
08-30-91	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
10-14-91	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
01-08-92	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00

CLOSING LIEN-P. 3

M.L.

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 5100.⁰⁰


George D. Karalis, M.D., M.P.H.

=====

DEFENDANTS: Please call me to negotiate this lien.

ATTENDING PHYSICIAN'S STATEMENT
Type or Print

RAILROAD EMPLOYEES
AND THEIR DEPENDENT



MEDICARE MEDICAID CHAMPUS OTHER

PATIENT & EMPLOYEE (SUBSCRIBER) INFORMATION

1. PATIENT'S NAME (First name, middle initial, last name) **M.L.**
 2. PATIENT'S DATE OF BIRTH **01 | 07 | 49**
 3. EMPLOYEE'S NAME (First name, middle initial, last name) **M.L.**
 4. PATIENT'S ADDRESS (Street, city, state, ZIP code) [Redacted]
 5. IS PATIENT
 MALE FEMALE
 6. EMPLOYEE'S SOCIAL SECURITY NO. OR MEDICARE NO. [Redacted]
 7. PATIENT'S RELATIONSHIP TO INSURED
 SELF SPOUSE CHILD OTHER
 8. EMPLOYEE'S GROUP NO. (Of Group Name) **GA-23000**
 9. OTHER HEALTH INSURANCE COVERAGE - ENTER NAME OF POLICYHOLDER AND PLAN NAME AND ADDRESS AND POLICY OR MEDICAL ASSISTANCE NUMBER **N/A**
 10. WAS CONDITION RELATED TO:
 A. PATIENT'S EMPLOYMENT
 YES NO
 B. AN AUTO ACCIDENT
 YES NO
 11. EMPLOYEE'S ADDRESS (Street, city, state, ZIP code) [Redacted]
 12. PATIENT'S OR AUTHORIZED PERSON'S SIGNATURE (Read back before signing) **M.L.**
 13. I authorize payment of medical benefits to undersigned physician or supplier for services described below **M.L.**
 DATE **Nov 2, 1992**

PHYSICIAN OR SUPPLIER INFORMATION

14. DATE OF ILLNESS (FIRST SYMPTOM) OR INJURY (ACCIDENT) OR PREGNANCY (LMP) **11-02-92**
 15. DATE FIRST CONSULTED YOU FOR THIS CONDITION **11-02-92**
 16. HAS PATIENT EVER HAD SAME OR SIMILAR SYMPTOMS?
 YES NO
 17. DATE PATIENT ABLE TO RETURN TO WORK
 18. DATES OF TOTAL DISABILITY
 FROM **None** THROUGH
 19. NAME OF REFERRING PHYSICIAN **None**
 20. FOR SERVICES RELATED TO HOSPITALIZATION GIVE HOSPITALIZATION DATES
 ADMITTED DISCHARGED
 21. NAME & ADDRESS OF FACILITY WHERE SERVICES RENDERED (If other than home or office) **Office**
 22. WAS LABORATORY WORK PERFORMED OUTSIDE YOUR OFFICE?
 YES NO CHARGES:
 23. DIAGNOSIS OR NATURE OF ILLNESS OR INJURY, RELATE DIAGNOSIS TO PROCEDURE IN COLUMN D BY REFERENCE TO NUMBERS 1, 2, 3, ETC. OR DX CODE

309.90 Adjustment Disorder

A DATE OF SERVICE	B PLACE OF SERVICE	C FULLY DESCRIBE PROCEDURES, MEDICAL SERVICES OR SUPPLIES FURNISHED FOR EACH DATE GIVEN		DIAGNOSIS CODE	E CHARGES		F
		PROCEDURE CODE IDENTIFY	(Explain Unusual Services or Circumstances)				
11-02-92	3	90844	PSYCHOTHERAPY - 45 MIN		150	00	
11-23-92	3	90844	PSYCHOTHERAPY - 45 MIN.		150	00	
12-07-92	3	90844	Psychotherapy - 45 MIN.		150	00	
12-14-92	3	90844	Psychotherapy - 45 MIN		150	00	
12-22-92	3	90843	Psychotherapy - 25 min		100	00	

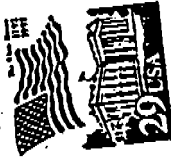
24. SIGNATURE OF PHYSICIAN OR SUPPLIER **George Karalis MD** DATE **04-28-93**
 25. ACCEPT ASSIGNMENT (GOVERNMENT CLAIMS ONLY) (See back) YES NO
 26. YOUR SOCIAL SECURITY NO.
 27. YOUR EMPLOYER I.D. NO. **94-2312718**
 27. TOTAL CHARGE **700 00**
 28. AMOUNT PAID **01**
 29. BALANCE DUE **700 00**
 30. YOUR PATIENT'S ACCOUNT NO.
 31. PHYSICIAN'S OR SUPPLIER'S NAME, ADDRESS, ZIP CODE & TELEPHONE NO.
GEORGE KARALIS, M.D., Inc.
235 EL CAMINO DEL MAR
SAN FRANCISCO, CA 94121-1114
(415) 668-6634
 I.D. NO.

PLACE OF SERVICE CODES: 1 - (IH) - INPATIENT HOSPITAL 5 - DAY CARE FACILITY (PSY) 9 - AMBULANCE
 2 - (OH) - OUTPATIENT HOSPITAL 6 - NIGHT CARE FACILITY (PSY) 0 - (OL) - OTHER LOCATIONS
 3 - (O) - DOCTOR'S OFFICE 7 - (NH) - NURSING HOME 0 - (IL) - INDEPENDENT LABORATORY
 4 - (H) - PATIENT'S HOME 8 - (SNF) - SKILLED NURSING FACILITY

Southern Pacific

REVENUE ACCOUNTING
P.O. BOX 7990
SAN FRANCISCO, CA 94120-7990

8-2596



The Travelers
415 Bearcat Drive
P. O. Box 30985
Salt Lake City, UT 84130-0987

WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

(CLOSING LIEN)

Industrial Indemnity Claim #

CASE NO. SFO [REDACTED]

JB80023676-WC31

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN

GEORGE KARALIS, M.D., INC.

235 EL CAMINO DEL MAR
SAN FRANCISCO, CA 94121-1114

E.F. VS. LIEN CLAIMANT

ADDRESS

[REDACTED]

[REDACTED]

EMPLOYEE

ADDRESS

WELLS FARGO BANK

601 3RD ST.
SAN FRANCISCO, CA. 94107

ATTN: Cathi KORAB, Claims Exam- P.O. Box 49021

ADDRESS

INDUSTRIAL INDEMNITY

SAN JOSE, CA 95161

INSURANCE CARRIER

ADDRESS

The undersigned hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of

Eleven thousand seven hundred seventy Dollars (\$ 11,779.72) against

nine & 72/100

any amount now due or which may hereafter become payable as compensation to

EMPLOYEE

on account of injury sustained by him on Cumulative

DATE

E.F.

This request and claim for lien is for: (Mark appropriate box)

- The reasonable expense incurred by or on behalf of said employee for medical treatment to cure or relieve from the effects of said injury; or
- The reasonable medical expense incurred to prove a contested claim; or
- The reasonable value of living expenses of said employee or of his dependents, subsequent to the injury, or
- The reasonable living expenses of the wife or minor children, or both, of said employee, subsequent to the date of injury, where such employee has deserted or is neglecting his family; or
- The reasonable fee for interpreter's services performed on

Opening Lien + Closing Statement = Total of Both Liens
 \$1216.44 + \$10,563.28 = \$11,779.72

NOTE: ITEMIZED STATEMENTS MUST BE ATTACHED

The undersigned declares that he delivered or mailed a copy of this lien claim to each of the above-named parties on

Service also on:

Dawson LEONARD, ESQ.

03-20-91

% SCHMIDT, HERLTHY
275 BATTERY ST. #1200

DATE

Henry Dentz Kuris MD

LIEN CLAIMANT

SAN FRANCISCO, CA 94111

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation.

James KNEISLER, ESQ.

% Douglas & Kneisler

595 MARKET ST. / 25th FLOOR
SAN FRANCISCO, CA. 94105

ATTORNEY FOR EMPLOYEE

EMPLOYEE

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

03-18-91

Tax I.D. # 94-2312718

STATEMENT

Patient:

E. F.

(W.C.A.B. # SFO

Diagnosis: General Anxiety Disorder (300.02)

11-28-89	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 98.40
12-11-89	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 130.00
12-19-89	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 130.00
02-20-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 130.00
03-06-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 100.00
04-19-90	(code 99049) BROKEN APPOINTMENT WITHOUT ADEQUATE NOTIFICATION	\$ 130.00
11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36
11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36
11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36
11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36

E. F.

11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36
11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36
11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36
11-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 39.36
12-12-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-12-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-12-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-12-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-12-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-12-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-22-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-22-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-23-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-23-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-23-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-23-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-23-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
12-23-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00

11/28
8x15 min =
2 hrs 80
SID.

12/12/89
5x15 min =
1 hr 15 min

10

7x15 min =
3x15 min

E.F.

12-26-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-26-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-26-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	12/26 - 8250
12-26-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	12/28 - 8250 -
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
12-28-89	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-11-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	1/11 - 8250 -
01-11-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-11-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-11-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	

E.F.

01-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	1/16 350
01-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	1/17 200
01-17-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-25-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	1/26 350
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	1/26 400
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-26-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	
01-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	1/28
01-28-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	100
01-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00	

E.F.

01-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
01-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
01-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
01-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
01-30-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
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02-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
02-12-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00

E.F.

03-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
03-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
03-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
03-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
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03-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-03-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
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04-03-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-20-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00

E.F.

04-20-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-23-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
04-23-90	(code 90855) Phone consult with or about patient -15 min.	\$ 50.00
05-03-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-03-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
05-08-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
06-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
06-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
06-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
06-07-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-24-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

E.F.

08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
08-29-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
09-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
09-05-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-10-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
10-11-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-06-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-14-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-14-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
11-16-90	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-06-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-19-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-21-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-25-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00

E.F.

02-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
02-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
12-14-89	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 12-14-89.	\$ 75.00
02-14-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 02-14-90.	\$ 75.00
03-31-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 03-31-90.	\$ 100.00
05-15-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 05-15-90.	\$ 100.00
07-09-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 07-09-90.	\$ 100.00
09-27-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 09-27-90.	\$ 100.00
11-11-90	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Report dated 11-11-90.	\$ 100.00

E.F.

02-09-91 (code 99080) Medical status report
preparation. Reports required under
Sect. 9785 of Calif. Admin. Code,
Title 8. Report dated 02-09-91. \$ 100.00

07-31-90 (code 90899) Review of medical
literature and/or research materials
re: psychopharmacotherapy and/or
diagnosis or treatment (90 minutes) \$ 300.00

12-04-89 (code 90803) Psychotherapy-45 min. \$ 130.00
(code 90875) Hypnotherapy-45 min.. \$ 130.00
(code 90806) Psychotherapy-25 min. \$ 80.00

THIS VISIT LASTED 115 MINUTES.

NOTE REGARDING PHONE CONSULTATIONS (code 90855):

Code 90855 refers to telephone consultations with or about a patient. Where code 90855 appears several times for a given date, it signifies that a phone consult exceeded 15 minutes. For example, a call lasting 60 minutes would show up on this statement as four distinct 90855 itemizations.

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 10,563.28

Very truly,

George D. Karalis MD MPH
George D. Karalis, M.D., M.P.H.

E.F.

PENDING LIEN

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
WORKERS' COMPENSATION APPEALS BOARD

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN ID OR CASE NO. [REDACTED]

(Print or type names and addresses; include ZIP Codes)

[REDACTED] V.B. ALAMEDA, CA 94501

Injured Worker [REDACTED] Address [REDACTED] Date of Claimed Injury 07-23-91 Social Security Number [REDACTED] Date of Birth 07-25-51

Attorney for Injured Worker ANIEL LEVY / 225 WEST WINTON #201 / HAYWARD 94544

Employer ROBECK, PHLEGER & HARRISON / SPEAR ST. TOWER / ONE MARKET PLAZ Address SAN FRANCISCO 94105

Insurance Carrier or, if Self-Insured, Certificate Name HUBB GROUP / TWO EMBARCADERO CENTER #900 Address Where Claim Administered SAN FRANCISCO, CA. 94111

Adjusting Agency, if Agency Administered NONE

Attorney for Employer/Carrier GEORGE KARALIS, M.D., INC. / 235 EL CAMINO DEL MAR / SAN FRANCISCO 94121-1114

Attorney for Lien Claimant NONE (415) 668-6634

The lien claimant hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of ONE THOUSAND THREE HUNDRED NINETY DOLLARS (\$1390.00) against any amount now due which may hereafter become payable as compensation to the above named worker on account of the above claimed injury.

- This request and claim for lien is for (Mark appropriate box):
- The reasonable expense incurred by or on behalf of said worker for medical treatment to cure or relieve from the effects of said injury; or
 - The reasonable medical expense incurred to prove a contested claim; or
 - The reasonable value of living expenses of said worker or of his or her dependents, subsequent to the injury, or
 - The reasonable living expenses of the spouse or minor children, or both, of said worker, subsequent to the date of injury, where such worker has deserted or is neglecting his or her family; or
 - The reasonable fee for interpreter's services performed on _____, 19____, Division Workers' Compensation San Francisco
- Med. services are continuing.

RECEIVED
SEP 2 1991
Division
Workers' Compensation
San Francisco

NOTE: ITEMIZED STATEMENT JUSTIFYING THE LIEN MUST BE ATTACHED
FOR INJURIES OCCURRING ON OR AFTER JANUARY 1, 1990, FOR WHICH THE LIEN CLAIMANT DOES NOT HAVE A CLAIM IDENTIFICATION NUMBER, the lien claimant declares under penalty of perjury that: a copy of the original completed Employee's Claim for Workers' Compensation Benefits (DWC Form 1) is attached, or the lien claimant does not have a copy of the claim form, but made the following efforts to secure one:

A copy of the lien claim and supporting documents was served by mail or delivered to each of the above-named parties.

Signature of Attorney for Lien Claimant [REDACTED] Signature of Lien Claimant Mary Ruth Kank MD MPH Date 09-08-91

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation. [REDACTED] V.B.
Signature of Injured Worker

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

07-30-91

Tax I.D. # 94-2312718

STATEMENT

V.B.

Patient: [REDACTED] S (W.C.A.B. # [REDACTED])
(Soc. Sec. # [REDACTED])

Diagnosis: Major Depression 296.23/Gen. Anxiety Disord.
300.02/ Panic Disorder 300.01

07-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-26-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-30-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-30-91	(code 90855) Phone consult with or about patient -15 min.	\$ 70.00
07-30-91	(code 99080) Medical status report preparation. Reports required under Sect. 9785 of Calif. Admin. Code, Title 8. Reports dated 07-26-91 & 07-30-91 (3-day & 5-day letters)	\$ 100.00

V.B.

07-30-91 (code 90803) Psychotherapy-45 min. \$ 150.00
(code 90803) Psychotherapy-45 min. \$ 150.00
(code 90803) Psychotherapy-45 min. \$ 150.00
(code 90803) Psychotherapy-45 min. \$ 150.00

THIS VISIT LASTED 185 MINUTES.

07-30-91 (code 99080) DOCTORS FIRST REPORT \$ 100.00
07-30-91 (code 99080) Medical Report \$ 100.00

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 1390.00

Very truly,



George D. Karalis, M.D., M.P.H.

V.B.

CLOSING LIEN

WORKERS' COMPENSATION APPEALS BOARD JUL 13 1993

NOTICE AND REQUEST FOR ALLOWANCE OF LIEN

(Print or type names and addresses; include ZIP Codes)

ID OR CASE NO. Division of

OAK

SAN FRANCISCO

CA 94501

Injured Worker

CT 07-23-91

07-25-51

Date of Claimed Injury

Social Security Number

Date of Birth

DANIEL LEVY / 2001 WAYNE AV. #102 / SAN LEANDRO, CA 94577

Attorney for Injured Worker

Address

BROBECK, PHLEGER & HARRISON / SPEAR ST. TOWER / ONE MARKET PLAZA / SAN FRANCISCO, CA.

Employer

Address

CHUBB GROUP / Two Embarcadero Center #900 . 94105

Insurance Carrier or, if Self-Insured, Certificate Name

SAN FRANCISCO CA. 94111

Address Where Claim Administered

Adjusting Agency, if Agency Administered

RABG & DZIENSKI / Two Embarcadero Center #880 / CA. 94111

Attorney for Employer/Carrier

Address

GEORGE KARALIS, M.D., INC. / 235 EL CAMINO DEL MAR

Lien Claimant

Address and Telephone No.

NONE (415-668-6634) SAN FRANCISCO, CA 94121-1114

Attorney for Lien Claimant

Address and Telephone No.

The lien claimant hereby requests the Workers' Compensation Appeals Board to determine and allow as a lien the sum of SEVENTY ONE HUNDRED FORTY Dollars (\$ 7140) against any amount now due or which may hereafter become payable as compensation to the above named worker on account of the above claimed injury.

This request and claim for lien is for (Mark appropriate box):

- The reasonable expense incurred by or on behalf of said worker for medical treatment to cure or relieve from the effects of said injury; or
- The reasonable medical expense incurred to prove a contested claim; or → PrS Report unpaid
- The reasonable value of living expenses of said worker or of his or her dependents, subsequent to the injury; or
- The reasonable living expenses of the spouse or minor children, or both, of said worker, subsequent to the date of injury, where such worker has deserted or is neglecting his or her family; or
- The reasonable fee for interpreter's services performed on _____ 19____.

*** Seek 10% Penalty + Interest for unpaid treatment and Med-legal Report.**
NOTE: ITEMIZED STATEMENT JUSTIFYING THE LIEN MUST BE ATTACHED
FOR INJURIES OCCURRING ON OR AFTER JANUARY 1, 1990, FOR WHICH THE LIEN CLAIMANT DOES NOT HAVE A WCAB IDENTIFICATION NUMBER, the lien claimant declares under penalty of perjury that:

a copy of the original completed Employee's Claim for Workers' Compensation Benefits (DWC Form 1) is attached, or the lien claimant does not have a copy of the claim form, but made the following efforts to secure one:

Docket already open.

JUL 13 1993
Division of
Workers' Compensation
District Office
SAN FRANCISCO

A copy of the lien claim and supporting documents was served by mail or delivered to each of the above named persons.

Signature of Attorney for Lien Claimant

Signature of Lien Claimant

07-07-93
Date

EMPLOYEE'S CONSENT TO ALLOWANCE OF LIEN

I consent to the requested allowance of a lien against my compensation.

Signature of Attorney for Injured Worker

Signature of Injured Worker

WCAB Form 6 (Rev 2/91)

OPEN LIEN

+ UNPAID PrS REPORT

+ CLOSING LIEN

FINAL DUE

7/14/93

GEORGE DEMETRIUS KARALIS, M.D., M.P.H.
235 EL CAMINO DEL MAR
SAN FRANCISCO, CA 94121-1114
(415) 668-6634

Psychiatry

V.B.

RE: case of _____
(W.C.A.B. case *) (Soc. Sec. *)

I ATTACH THIS STATEMENT TO MY BILLING BECAUSE MY FEES ARE JUSTIFIABLY IN EXCESS OF THE FEES SET FORTH IN THE OFFICIAL MEDICAL FEE SCHEDULE. THE REASONS WHY MY SERVICES SHOULD BE PAID AT A RATE IN EXCESS OF THE RATES IN THE OFFICIAL MEDICAL FEE SCHEDULE ARE AS FOLLOWS:

I CERTIFY THAT THE FEES FOR MY MEDICAL SERVICES ARE REASONABLE AND ARE NO GREATER THAN MY USUAL FEE FOR THE SAME SERVICES.

THE FEES I CHARGE, (E.G., \$ 150 PER 45-MINUTE PSYCHOTHERAPY OR HYPNOTHERAPY SESSION) ARE REASONABLE AND WITHIN THE RANGE OF PREVAILING FEES CHARGED BY SIMILAR PROVIDERS FOR SIMILAR SERVICES IN MY GEOGRAPHICAL AREA.

THERE WAS TIME SPENT IN NECESSARY PROCEDURAL MATTERS IN THIS CASE (INVOLVING TELEPHONE CALLS AND/OR LETTERS/FORMS TO OR WITH DEFENSE'S AND/OR CLAIMANT'S COUNSEL/AGENTS AND/OR EMPLOYER AND/OR OTHER INTERESTED PRIVATE/PUBLIC ENTITIES. I AM NOT OTHERWISE BILLING FOR THE TIME OR EFFORT EXPENDED.

George Demetrius Karalis, M.D., M.P.H.
235 El Camino Del Mar
San Francisco, CA 94121-1114
(415) 668-6634

Psychiatry

07-07-93

Tax I.D. # 94-2312718

STATEMENT

V. B.

Patient: [REDACTED] (W.C.A.B. # OAK [REDACTED])
(SSN # [REDACTED])

Diagnosis: 296.25 Major Depression / 300.02 General
Anxiety Disorder/300.01 Panic Disorder

08-20-91	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
10-04-91	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
11-18-91	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
12-19-91	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
04-14-92	(code 99080) TREATMENT PROGRESS REPORT	\$ 50.00
04-27-92	(code 99080) Med. records review (95 min.)	\$ 300.00
08-14-91	(code 99080) Med. records review (45 min.)	\$ 150.00
08-12-91	(code 99080) Med. records review (60 min.)	\$ 200.00
08-28-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
12-19-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
04-14-92	(code 90806) Psychotherapy-25 min.	\$ 100.00
01-06-92	(code 90806) Psychotherapy-25 min.	\$ 100.00
09-18-91	(code 90811) Psychotherapy-15 min.	\$ 50.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 60 MINUTES.	
09-25-91	(code 90811) Psychotherapy-15 min.	\$ 50.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 60 MINUTES.	
09-18-91	(code 90811) Psychotherapy-15 min.	\$ 50.00
	(code 90875) Hypnotherapy-45 min.	\$ 150.00
	THIS VISIT LASTED 60 MINUTES.	

CLOSING LIEN-P. 1

SDK

10-30-91	(code 90811) Psychotherapy-15 min.	\$ 50.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 60 MINUTES.	
11-27-91	(code 90811) Psychotherapy-15 min.	\$ 50.00
	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	THIS VISIT LASTED 60 MINUTES.	
08-09-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
08-13-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
08-20-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
09-05-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
09-13-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
10-01-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
10-11-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
10-25-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
11-11-91	(code 90803) Psychotherapy-45 min.	\$ 150.00
	(code 90877) Hypnotherapy-15 min..	\$ 50.00
	THIS VISIT LASTED 60 MINUTES.	
08-01-91	(code 90875) Hypnotherapy-45 min..	\$ 150.00
	(code 90876) Hypnotherapy-25 min..	\$ 100.00
	THIS VISIT LASTED 80 MINUTES.	

The patient has paid nothing towards this bill.

Therefore, the total due = \$ 4250.⁰⁰



George D. Karalis, M.D., M.P.H.

DEFENDANTS: Please call me to
negotiate this lien.