

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

JUL 11 2022

TAMMY H. DOWNS, CLERK

By:  DEP CLERK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS

LAURA LYNN HAMMETT, an )  
individual, )

Plaintiff, )

vs. )

Case No.: 4:21-CV-00189-LPR

PORTFOLIO RECOVERY )  
ASSOCIATES, LLC, a Limited )  
Liability Company; DOES 1-99 )

Defendants )

Brief in Support of Plaintiff's Motion For Leave to Disclose "Expert Report" Filed  
Under Seal on June 16, 2022 to Regulatory and Law Enforcement Agencies and to  
file Rebuttal Report UNDER SEAL

The Court made an oral order on April 26, 2022.

Counsel for PRA summarized the oral order by email of July 7, 2022. Inter alia:

“PRA does not consent to any proposed motion, particularly in light of Judge Rudofsky’s instruction at the summary judgment hearing that the parties refrain from further motions or other activity pending the Court’s ruling.” (Exhibit A)

PRA’s filing its motion to file under seal and the expert report is filing “motions or other activity”. Plaintiff is not clear on whether a response to the filed report is required, and thus is presenting her rebuttal expert’s CV and report and asking to file the report under seal as Exhibit F.

Plaintiff would want the Expert Report to be filed under seal because some of the content is incorrect, some embarrassing and some may cause harm to third parties and harm to Plaintiff’s relationship with the third parties. The non-parties were not given an opportunity to ask for a protective order. A non-party seems to have buried the memory of the incidents, is leading a peaceful, happy life and it would cause extreme emotional distress to force him to relive the incidents. Dr. Adhia’s rendition was wrong in a way that causes the report to be defamatory to a non-party.

“[T]he Court has supervisory power over its own records, and the decision to seal a file is within the Court's discretion. *See Webster Groves School Dist. v. Pulitzer Pub. Co.*, 898 F.2d 1371, 1376 (8th Cir. 1990).” *Futurefuel Chem. Co. v. Lonza, Inc.*, No. 1:11CV00061 SWW, 2013 WL 12289918, at \*1 (E.D. Ark. Feb. 1, 2013), *aff'd in part, appeal dismissed in part sub nom. FutureFuel Chem. Co. v. Lonza, Inc.*, 756 F.3d 641 (8th Cir. 2014)

“Given the presumptive right of public access to the briefs and supporting documents filed at the adjudicative stage of a case, ‘documents used by parties moving for, or opposing, summary judgment should not remain under seal absent the most compelling reasons.’ *Joy v. North*, 692 F.2d 880, 893 (2nd Cir. 1982).”  
Id.

“Where the common-law right of access is implicated, court must consider degree to which sealing a judicial record would interfere with interests served by the common-law right of access and balance that interference against the salutary interests served by maintaining confidentiality of the information sought to be sealed.” *IDT Corp. v. eBay*, 709 F.3d 1220 (8th Cir. 2013)

The case at hand is tricky because it includes highly sensitive and confidential facts, but there are strong public policy implications.

Plaintiff asks the Court to balance the need to protect the public from unscrupulous attorneys or persons presenting themselves as medical doctors when

Plaintiff's Motion For Leave to Disclose "Expert Report" Filed Under Seal on June 16, 2022 to Regulatory and Law Enforcement Agencies and to File Rebuttal Report UNDER SEAL

not licensed to practice medicine in Arkansas on the one hand, and the individuals' right to be free from unnecessary embarrassment, defamation and the distress of revisiting traumatic experiences that are disclosed to the public, on the other.

“The decision to allow or deny access to judicial records is one best left to sound discretion of trial court in light of the relevant facts and circumstances of the particular case.” *id*

“[One party] urged the district court to unseal the complaint in the interest of ‘an open court system,’ and [the other party] that the document should be sealed to protect the confidentiality of sensitive [] information. *See Nixon*, 435 U.S. at 598, 98 S.Ct. 1306.” *Id* In this case, Plaintiff can redact the report to remove the most egregious or disturbing alleged facts. The medical boards and committees on professional conduct are far more likely to keep the unredacted material confidential than Dr. Adhia (who maintains that the exam was not confidential) and the attorneys who have already posted Plaintiff’s credit report and other confidential information online, supposedly by accident.

Dr. Adhia who wrote the report is not licensed to practice medicine in Arkansas. He is also not licensed to practice law in Arkansas.

The Arkansas Medical Board allows out-of-state doctors to review records in Arkansas but forbids out-of-state doctors from diagnosing independently.

(Exhibit B, audio recording of Julie from the AMB, start at about 2:00)

Dr. Adhia was aware of potential restrictions to performing litigation medical exams as early as April 27, 2020. (Exhibit C, page 7 of 16, marked Page 2 of 4 within, bottom paragraph.)

Dr. Adhia wrote: "If evaluations or testimony is required outside of Texas, it is the retaining attorney's responsibility to make all necessary legal arrangements with the local state medical licensing and to confirm that I have legal permission to examine, diagnose and assess the examinee, and to testify as a medical expert in the adjudicating jurisdiction."

PRA's Counsel wrote that the medical exam "did not constitute the "practice of medicine" under Arkansas Code § 17-95-202." (Exhibit A)

"(3) "Practice of medicine" means:

(A) Holding out oneself to the public within this state as being able to diagnose [] any human [] mental condition, whether by the use of [] or other means whatsoever;

(D) Using the title "M.D.", "M.B.", "D.O.", "physician", "surgeon", or any other word or abbreviation to indicate or induce others to believe that one is engaged in the diagnosis [] of persons afflicted with disease, injury, or defect of body or mind, except as otherwise expressly permitted by the laws of this state relating to the practice of any limited field of the healing arts;" Ark. Code Ann. § 17-95-202 (West)

Dr. Adhia made diagnoses that was different than the diagnoses of Plaintiff's attending health care professionals and labeled it "Diagnoses" on page 51 of the Expert Report.

Dr. Adhia represented himself as "Sanjay Adhia, M.D. on the cover of the Expert Report.

On the report for the Hervey case, which took place in Kansas, Dr. Adhia wrote "LICENSED PHYSICIAN, TEXAS". He removed this clarification from the cover of the Hammett report. (Exhibit C, page 1) Hervey settled before trial.

Dr. Adhia was licensed to do an internship in Kansas, but that license was cancelled in 2011 or prior. The college listed in Kansas is different than the college listed on the TMB site. (EXHIBIT D) Kansas medical board shows a degree date of 1/31/2004. Texas shows graduation date of 04/2003. Ramaiah College and Bangalore University are not affiliated, though they may have been at some time. Both schools are in the city of Bangalore.

Assuming Dr. Adhia did not buy one of the fraudulent degrees easily obtainable online, no one can take Dr. Adhia's medical school diploma away. A valid diploma shows the recipient is educated in the field of medicine and therefore able to review the work of medical doctors and therapists who are licensed to practice medicine in the state in which the subject was present. Dr. Sanjay Adhia cannot use the term M.D. in Arkansas as an inducement for a juror to believe he is

allowed to engage in diagnosis in Arkansas. Doctorate is a level of education. It is not licensure. Just as Mr. Trefil went through a process to practice law in Arkansas Pro Hac Vice, Dr. Adhia was required to follow a procedure. He failed.

Plaintiff found persuasive authority that the “medical boards are the proper authority to police improper testimony given by physician experts in medical malpractice actions.” 33 Pepp.L. Rev. 275

“The Court of Appeals, Schwelb, J., held that Board of Medicine could find that false testimony given by physician as expert in medical malpractice action constituted a false report ‘in the practice of medicine.’ Affirmed.” *Joseph v. D.C. Bd. of Med.*, 587 A.2d 1085 (D.C. 1991) “It was not unreasonable for the Board of Medicine to determine that false testimony given by physician as expert in medical malpractice action constituted a false report in the “practice of medicine,” warranting discipline, even though the patient whose care was at issue in the action was already dead at the time of the misrepresentations.” *id*

Dr. Adhia’s report purports to give an independent diagnosis of Hammett’s condition. As addressed in the rebuttal report (Exhibit F, UNDER SEAL), even if Dr. Adhia was licensed in Arkansas, his report contains so much misinformation and shows a lack of using the accepted methodology to make a proper diagnosis. When the Court gives permission, Plaintiff will file a motion in limine to exclude the report. In the meantime, she begs the Court for leave to share the report with

Plaintiff’s Motion For Leave to Disclose “Expert Report” Filed Under Seal on June 16, 2022 to Regulatory and Law Enforcement Agencies and to File Rebuttal Report UNDER SEAL

the various regulatory agencies and to make a redacted version of the report that would be suitable for publication.

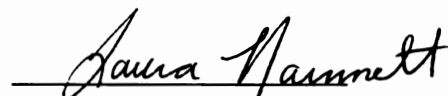
Dated July 11, 2022



Laura Lynn Hammett  
16 Gold Lake Club Road  
Conway, Arkansas 72032  
760-966-6000  
thenext55years@gmail.com  
Plaintiff Pro Se

#### CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2022, a true and exact copy of the foregoing was filed with the Clerk of the Court for entry on the electronic filing system which will cause service upon all counsel of record via email. The electronic recording Exhibit B was emailed to Counsel for PRA on June 16, 2022 and again July 11, 2022. Exhibit F, the rebuttal report, was emailed on June 16, 2022 and a paper copy hand delivered to Rose Law Firm on July 11, 2022.



Laura Lynn Hammett  
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Conway, Arkansas 72032  
760-966-6000  
thenext55years@gmail.com  
Plaintiff Pro Se

Plaintiff's Motion For Leave to Disclose "Expert Report" Filed Under Seal on June 16, 2022 to Regulatory and Law Enforcement Agencies and to File Rebuttal Report UNDER SEAL





Laura Lynn Hammett <thenext55years@gmail.com>

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## Hammett v PRA and Adhia Proposed Motion to allow for limited disclosure of Expert Report

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Trefil, James K. <James.Trefil@troutman.com>

Thu, Jul 7, 2022 at 11:55 AM

To: Laura Lynn Hammett <thenext55years@gmail.com>, David Mitchell <dmitchell@roselawfirm.com>, "Komisin, John (Jed)" <Jed.Komisin@troutman.com>, Nick Mote <NMOTE@roselawfirm.com>

Ms. Hammett,

PRA does not consent to any proposed motion, particularly in light of Judge Rudofsky's instruction at the summary judgment hearing that the parties refrain from further motions or other activity pending the Court's ruling.

As to your incessant complaints and threats concerning Dr. Adhia, I want to make this perfectly clear. He was not your doctor, you were not his patient, and he did not medically treat you. Your interview with him was part of his factual and background investigation in support of his Rule 26 expert report, nothing more. It did not constitute the "practice of medicine" under Arkansas Code § 17-95-202.

The in-person examination in Arkansas was requested by you and ordered by the Court at your insistence, likely as a ruse by you to generate this latest complaint. If you have some authority stating a medical license from a specific state is required for a mental examination under FRCP 35 please provide it. Otherwise, we request you refrain from making further baseless threats.

Regards,

Jim

**James K. Trefil**

**Counsel**

**troutman pepper**

Direct: 804.697.1864 | Internal: 15-1864

james.trefil@troutman.com

---

**From:** Laura Lynn Hammett <thenext55years@gmail.com>

**Sent:** Thursday, July 7, 2022 12:36 PM

**To:** David Mitchell <dmitchell@roselawfirm.com>; Komisin, John (Jed) <Jed.Komisin@troutman.com>; Trefil, James K. <James.Trefil@troutman.com>; Nick Mote <NMOTE@roselawfirm.com>

**Subject:** Hammett v PRA and Adhia Proposed Motion to allow for limited disclosure of Expert Report

**EXTERNAL SENDER**

EXHIBIT A

[Quoted text hidden]

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This e-mail (and any attachments) from a law firm may contain legally privileged and confidential information solely for the intended recipient. If you received this message in error, please notify the sender and delete it. Any unauthorized reading, distribution, copying, or other use of this e-mail (and attachments) is strictly prohibited. We have taken precautions to minimize the risk of transmitting computer viruses, but you should scan attachments for viruses and other malicious threats; we are not liable for any loss or damage caused by viruses.

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS

LAURA LYNN HAMMETT, an )  
individual, )  
)  
Plaintiff, )  
)  
vs. )  
) Case No.: 4:21-CV-00189-LPR  
PORTFOLIO RECOVERY )  
ASSOCIATES, LLC, a Limited )  
Liability Company; DOES 1-99 )  
)  
Defendants )  
)  
)  
\_\_\_\_\_ )

EXHIBIT B

Recording June 16, 2022 Plaintiff and Regulatory of Arkansas Medical Board

Plaintiff's Motion For Leave to Disclose "Expert Report" Filed Under Seal on June 16, 2022 to  
Regulatory and Law Enforcement Agencies and to File Rebuttal Report UNDER SEAL  
4:21-CV-00189-LPR

**SANJAY G. ADHIA, M.D. MRO**

Board-Certified in Forensic Psychiatry  
Board-Certified in Brain Injury Medicine  
Board-Certified in Psychiatry  
American Board of Psychiatry and Neurology

TELEPHONE: (832) 746-5905  
[SGAMD@SGAMD.COM](mailto:SGAMD@SGAMD.COM)  
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HOUSTON, TEXAS  
5826 NEW TERRITORY BLVD., SUITE 803  
SUGAR LAND, TEXAS 77479

FORENSIC PSYCHIATRY  
CLINICAL PSYCHIATRY  
LICENSED PHYSICIAN, TEXAS

**RETAINING PARTY:**

Karon D. Ramsey  
Wells & Ramsey LLC  
1115 East 65th Street  
Kansas City, Missouri 64131  
(816) 333-1414  
[karonramsey01@att.net](mailto:karonramsey01@att.net)

**CASE:**

*Curtis Anthony Hervey, Plaintiff v. United States of America, et. al., Defendant*, case No. 19-4033-SAC-ADM

**REFERRAL QUESTION:**

Are the following elements of Medical Malpractice present by Dr. Jay P. Kennedy?

- 1) Duty of care
- 2) Dereliction

**EXPERTISE:**

I have completed a Forensic Psychiatry fellowship and am triple board-certified in Psychiatry, Forensic Psychiatry and Brain Injury Medicine by the American Board of Psychiatry and Neurology. I regularly perform forensic psychiatric evaluations and prepare reports of my findings. Additionally, I assist attorneys nationwide as an Expert Witness in civil, criminal and military cases including Adjudicative Incompetency, Wrongful Death, Personal Injury, Criminal Responsibility, Defense Base Act, etc.

I serve as the Assistant Professor of Psychiatry at Memorial Hermann TIRR where my clinical focus is treating the neuropsychiatric complications of brain and spinal cord injury. I also just started treating patients at Avenue 360 which is a Federally Qualified Health Center serving primarily Persons with HIV, the LGBTQ and those with inadequate housing.

EXHIBIT C

In my recent past, I served as Medical Director of an outpatient psychiatry and addictions clinic. I used to treat Death Row and Ad Seg offenders on a high-security TDCJ unit (state prison).

I also have experience teaching medical students, psychiatry residents and nurse-practitioners how to diagnose and treat psychiatry patients. I have also supervised a psychiatry resident who perform a forensic psychiatric evaluation. I have provided lectures on Forensic Psychiatry to law students at Willamette University College of Law and trainees at UTMB and UT Health.

I am a member of the American Academy of Psychiatry and the Law (AAPL) and have attended their educational conferences. In 2019, Governor Abbott appointed me to the Advisory Committee to The Texas Board of Criminal Justice on Offenders with Medical or Mental Impairments.

A substantial portion of my training has occurred at Veterans Administration facilities. As a psychiatry resident I have rotated through various VA facilities including Topeka Kansas, Leavenworth Kansas, Kansas City Missouri and the Conroe Texas CBOC. The rotations included Inpatient General Psychiatry, Addiction Psychiatry, Geriatric Psychiatry, Outpatient Psychiatry, Consult Psychiatry, Internal Medicine and Neurology. I have performed an IME on a veteran. I am familiar with the standard of care provided at VA facilities.

Please refer to my CV for further details.

#### **SOURCES OF INFORMATION:**

NOTE: Although I may have been provided additional documents, my review was limited to the documents listed below. The focus of the review was based on data pertaining to the referral question listed above.

- 1) Approximately one-hour interview with Mr. Hervey (5.24.20)
- 2) 38. Dr. Lorton Expert Report (5.13.20 version)
- 3) Rescinded Amendment Denials (4.4.17)
- 4) Original and unredacted progress notes (6.30.16)
- 5) Redacted Version of Dr. Kennedy progress notes (6.30.16)
- 6) PD Misdiagnoses Clearances (2017)
- 7) P. Dr. Kennedy Interrogatories w signature (10.9.19)
- 8) Original and unredacted progress notes (6.30.16) (1)
- 9) OGC Final Agency Decision case #55019
- 10) N. Atty Cynthia Sheppard on 2010 Chaplaingate resignation (4.17.19)
- 11) Hervey 55019 FAD clarification ltr[5516]
- 12) Dr. Susan Harper Depression Consult (6.30.16)
- 13) Dr. Sharpnack BDI-II severe depression (4-22-16)
- 14) Case No. 19-4033-SAC-ADM\_35 deviations (12.2.19)
- 15) 101 Omissions Affidavit (11.26.19)

## **DISCUSSION:**

In the original version of the note titled "Primary Care Physician Note", dated June 30, 2016, Dr. Jay Kennedy documented discord with Mr. Hervey. There is no indication Dr. Kennedy adequately attempted to redirect Mr. Hervey to obtain a competency of psychiatric History of Presenting Illness, a Psychiatric Review of Systems (i.e. enquiring about mood disorders, anxiety disorders, trauma-related disorders or psychotic disorders), Past Psychiatric History, Social history or Family history.<sup>1</sup>

Dr. Kennedy failed to complete a comprehensive psychiatric evaluation. Dr. Kennedy did not elicit the history necessary to diagnose a "General Personality Disorder" before diagnosing a specific personality disorder. For example, there was no attention to details regarding "an enduring pattern [that] is inflexible and pervasive" or an "enduring pattern leads to clinically significant distress or impairment in social, occupational or other important areas of functioning" which are at the core of any personality disorder.<sup>2</sup> Dr. Kennedy checked off the symptom criteria without examining the necessary context, timecourse and the level impairment. Without the appropriate analysis, a clinician may state a patient has personality traits but can't render an official DSM 5 diagnosis. Additionally, Dr. Kennedy did not account for and rule out other psychiatric disorders.

It is worth noting that generally personality disorders are not diagnosed at the first visit. Generally, with increasing familiarity with the patient, they can be diagnosed. Additionally, it is challenging to discuss a personality disorder diagnosis with the patient, particularly at the first visit.

Personality disorders are primarily treated with psychotherapy. It is unclear what the clinical utility of Dr. Kennedy's diagnosis of personality disorders would be when the time would've been better spent examining Mr. Hervey's medical conditions and primary psychiatric disorders (i.e. depression, anxiety or PTSD). With that approach, Mr. Hervey may have elected to return to Dr. Kennedy. After developing rapport, Dr. Kennedy could have provided referrals to therapists to better diagnose and address any personality disorders.

Although Dr. Kennedy believed he diagnosed personality disorders, he did not discuss treatment options or indicate any referral to have the personality disorders treated. Normally a medical note follows the *SOAP* (subjective, objective, assessment and plan) format. Dr. Kennedy detailed his own ethnicity in the note (which is unusual) yet failed to detail an appropriate plan to address the alleged paranoid and narcissistic personality disorders.

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<sup>1</sup> <https://psychiatryonline.org/doi/pdf/10.1176/appi.books.9780890426760>

<sup>2</sup> As defined by the DSM 5. Dr. Kennedy, in his 2016 note, utilized the DSM-IV-TR which was published in 2000. The DSM 5, which replaces the DSM-IV-TR, was published in 2013. As there is no adequate justification in the available data for Dr. Kennedy to use the DSM-IV-TR three years after the DSM 5 has been published, I will utilize the DSM 5 as opposed to the edition that is currently 20 years outdated. For reference, I will state that the DSM-IV-TR includes "beginning by early adulthood and present in a variety of contexts" as the criteria for both Paranoid Personality Disorder and Narcissistic Personality Disorder.

The progress note indicates that Dr. Kennedy exhibited poor professional decorum. There was little, if any, semblance of developing a therapeutic rapport that generally exists between a doctor and patient. A more optimal strategy would have been to redirect the patient and attempt to engage in a more empathic approach, particular since this was the first time, they were meeting. Instead, Dr. Kennedy antagonized Mr. Hervey further by attempting to diagnose a personality disorder.

A Psychology note by James Sharpnack, 4/22/16, indicates several psychological tests were administered. There is no indication of a personality disorder diagnosis.

The VA has expunged Dr. Kennedy's diagnosis of personality disorders from Captain Hervey's medical records.

Mary Lorton, PhD, prepared a psychological report, dated March 5, 2020. Dr. Lorton render the following diagnoses: Persistent Depressive Disorder, Generalized Anxiety Disorder and Post-Traumatic Stress Disorder. There was no mention of any personality disorders.

**QUESTIONS:**

1. Are the following elements of Medical Malpractice presented by Dr. Kennedy?
  - A. Duty of care
  - B. Dereliction

The Duty of Care requires that Dr. Kennedy provide appropriate diagnosis and treatment. If a physician, particularly a generalist family physician, does not possess the requisite expertise to diagnose and treat a condition, they should refer the patient to the relevant specialist. As Mr. Hervey was visiting Dr. Kennedy to establish medical care, Dr. Kennedy had a Duty of Care towards Mr. Hervey.

The information indicates there was a Dereliction indicating a substantial deviation from the standard of care. Standard of care requires a physician to focus on the diagnosis and treatment of the patient. Standard of care requires a physician to have self-awareness of one's limitations. Dr. Kennedy deviated from the standard of care by attempting to render two personality disorder diagnoses in a contentious, amateur and counter-therapeutic manner. There was no indication that a referral for specialized treatment for these diagnoses was made.

2. Would a similarly qualified physician in similar situation have made the same clinical decision?

No.

3. Did United States government employee and agent Dr. Jay P. Kennedy fail to exercise reasonable care?

Yes

4. Did Dr. Kennedy breach the applicable standard of care when he failed to defer to the clinical decision of a VA staff psychiatrist named Dr. Susan J. Harper.

Yes.

5. Did Dr. Kennedy breach the applicable standard of care when he failed to perform diagnostic testing to confirm his diagnosis of "personality disorder"?

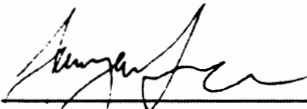
Yes.

6. Did Dr. Kennedy breach the applicable standard of care when he failed to annotate a differential diagnosis list and conduct rule-outs (ignored pre-existing diagnoses of dysthymia or persistent depressive disorder, insomnia, and chronic fatigue syndrome)?

Yes.

**OPINION**

It is my opinion, within reasonable medical certainty, Dr. Kennedy had a duty of care and deviated substantially from the standard of care.



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**Sanjay G. Adhia, M.D.**  
Board Certified Psychiatrist  
Board Certified Forensic Psychiatrist  
Board Certified in Brain Injury Medicine  
Texas Medical License

DATE SIGNED: 5/28/2020

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**SANJAY G. ADHIA, M.D.**  
Board-Certified in Forensic Psychiatry  
Board-Certified in Brain Injury Medicine  
Board-Certified in Psychiatry  
American Board of Psychiatry and Neurology

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SUGAR LAND, TEXAS 77479

FORENSIC PSYCHIATRY  
CLINICAL PSYCHIATRY  
LICENSED PHYSICIAN, TEXAS

**RETENTION CONTRACT**

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Wells & Ramsey LLC  
1115 East 65th Street  
Kansas City, Missouri 64131  
(816) 333-1414  
(816) 569-0345 Fax  
[karonramend01@att.net](mailto:karonramend01@att.net)

Re: Retention of Sanjay Adhia, M.D, Forensic Psychiatrist  
Case: Curtis Hervey - Malpractice

I look forward to working with you in my capacity as a forensic psychiatrist. I am pleased to provide professional services in this regard upon receipt of an executed copy of this Expert Witness Retention Contract in addition to the agreed upon retainer fee of \$2,500. This fee will be held and is not applied to fees billed which are due as submitted. Any unused portion of the retainer will be refunded when it is clear my services will no longer be required.

This contract is between Karon D. Ramsey ("retaining party," "retaining attorney," you, or similar reference) and Sanjay Adhia, M.D. Professional Association, a medical practice, for forensic psychiatric expert services as a consultant or expert witness. The retaining party is specifically neither Plaintiff(s) nor Defendant(s) (or insurer of either) in civil litigation; in the case of criminal matters for defense, the retaining party is defendant's attorney, and not defendant or defendant's personal representative.

My Fee Schedule is attached and incorporated in this Contract by this reference. The Fee Schedules sets out in greater detail my fees and costs and if there is a conflict with information provided here, the Fee Schedule will govern.

My current billing rate is \$500 per hour for all work with the exception of testifying at trial or deposition. My fee for testimony is \$650 per hour billed in 4-hour blocks, subject to the terms of my Fee Schedule

In the event there are travel expenses, these must be paid by the retaining attorney. Travel is billed as described in my Fee Schedule which is the last page of this Contract. I will provide a good-faith estimate for my time and expenses, but it is understood this is a guess and not a promise or limitation on charges.

April 27, 2020

Page 2 of 4

I bill time in increments of tenths of an hour for my services, including, but not limited to, phone calls and emails, consultations, conferences, research, examinations, psychological testing and preparing reports, as needed. In the absence of this signed retention contract and unless specifically agree, I do not consent to be disclosed as an expert witness in any matter, civil or criminal. In the event there is an unpaid balance or retainer in hand, whichever is greater, no report will be released nor testimony scheduled (in court or by deposition) until the entire balance is paid. Testimony in court or by deposition is billed in half-day (4-hour) blocks. Payment for my time involved in such testimony must be pre-paid. Generally, I require at least one month notice to re-schedule my clinic.

Testimony cancelled five (5) business days or fewer before scheduled testimony the retaining party will incur a cancellation fee per the Fee Schedule.

Cancellation fees are charged per the attached Fee Schedule for indicated scheduled work including travel, meetings, and examinations.

Periodically, I will submit invoices to the undersigned retaining party describing services rendered and expenses incurred. Payment of this invoice is due upon receipt. Prompt payment is the sole responsibility of the retaining party, irrespective of case outcome, terminating all consultation and accelerating the demand for immediate payment of any remaining or third-party agreements by the retaining party. Overdue accounts shall accrue interest at a rate of 2% per month on the unpaid balance. Failure to pay in a timely manner may void this Contract.

I strongly recommend that the retaining party forward for my review all relevant medical records, mental health records, investigation reports, witness statements, depositions and other case information prior to an Independent Medical Examination or deadline for report of expert findings. I recommend these materials be sent as far in advance as possible. Once it is decided that I will no longer be involved in the case, upon request I may return all documents and notes to the retaining attorney. There may be a charge for returning the documents.

The forensic work contemplated is specifically NOT the practice of medicine; no treatment is provided and no doctor-patient relationship shall be created or exist between me and any individual who is the examinee of a forensic psychiatric assessment conducted under the provisions of this agreement.

If evaluations or testimony is required outside of Texas, it is the retaining attorney's responsibility to make all necessary legal arrangements with the local state medical licensing and to confirm that I have legal permission to examine, diagnose and assess the examinee, and to testify as a medical expert in the adjudicating jurisdiction.

**SANJAY ADHIA, M.D.**  
**PROFESSIONAL ASSOCIATION**

April 27, 2020  
Page 3 of 4

I do not guarantee that my opinions will be favorable or unfavorable to you and/or your client(s). My findings are reached on objective assessment and reflect my objective and unbiased medical-legal opinions.

You agree to hold us harmless from any and all claims, demands, liabilities, costs, expenses, damages and causes of action relating or resulting from your acts or omissions relating to this agreement in any way.

The undersigned retaining party agrees to pay any and all necessary attorney's fees and court costs in the event it is necessary to institute arbitration or legal proceedings to collect sums owed pursuant to this agreement. Proper venue for resolution of any and all disputes shall be Fort Bend or Harris County, Texas.

By signing below, the retaining attorney indicates acceptance of this contract and the contractual provisions contained herein. If any amendment(s) are added by the retaining attorney, they will require my dated counter-initials for the amendment(s) to be legally binding.

Please return this executed contract, including your initials in the bottom left corner of the Fee Schedule along with the agreed upon retainer. Until the signed retention contract is received by me, you are not authorized to disclose or otherwise name me as an expert witness and I will be free to be retained by other parties, including opposing counsel.

Upon being retained by Karon D. Ramsey, or other retaining entity, I am retained for that specific case only and may be retained by any other attorney, including opposing counsel for other cases so long as there is not a direct conflict-of-interest.

The terms of this contract are governed under the laws of the State of Texas.

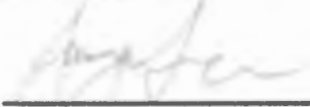
**AGREE AND ACKNOWLEDGED**

*NOTE: Please initial the following page*

**KARON D. RAMSEY  
ATTORNEY**

**SANJAY G. ADHIA, M.D.,  
FORENSIC PSYCHIATRY**

  
Signature

  
Signature

Date: 05/08/2020

Date: 5/28/2020

Karon D Ramsey, Attorney  
Print Name and Representative Capacity

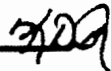
Sanjay Adhia, MD, MRO  
President of Sanjay Adhia, M D, PA  
Print Name and Representative Capacity

SANJAY ADHIA, M.D.  
PROFESSIONAL ASSOCIATION

April 27, 2020

Page 4 of 4

Description	Fees
Forensic Psychiatric Services, including, but not limited to, Independent Medical Examination, Collateral Interviews, review of records, assessments, psychological testing, pleadings including Declarations, consultation, which may include with attorneys, doctors, and other expert witnesses. Drafting report of opinions and findings. Communication by phone, in person and email. Medical research. Including standby time.	\$500/hour prorated in tenths of an hour
Testimony, at deposition or trial, including standby time. (Note cancellation fees below.)	\$650/hour
Travel: "Travel" applies to distances greater than 50 miles from Dr. Adhia's primary business address.  Travel Time (door-to-door) is billed at \$225/hour.  Travel days are charged as an 8-hour minimum. Therefore, actual travel hours are charged at the travel rate, and the balance of an 8-hour day is charged at Dr. Adhia's usual rate of \$500/hr. or \$650/hr.	\$225/hour
Lodging and meals; airfare car rental, parking, transportation and other costs associated with travel.	At cost
Cancellation fees apply if a Cancellation is made 5 working days or less:	
Cancellation Fees apply to scheduled testimony, at trial or deposition, or Independent Medical Examination and reflect a 3-hour minimum, except for cancellations which involve Travel.	\$1500.00 or \$1950.00
Cancellation Fees for Travel are as follows, unless agreed otherwise. An amount equal to airfare, lodging or other costs which are non-refundable to Dr. Adhia. Further, a cancellation fee equal to a one 8 hour day at Dr. Adhia's usual rate is due.	See description

INITIALS 

SNAYACHA, M.D.  
PROFESSIONAL ASSOCIATION

**SANJAY ADHIA, M.D., MRO**  
Board-Certified in Forensic Psychiatry  
Board-Certified Brain Injury Medicine  
Board-Certified in Psychiatry  
American Board of Psychiatry and Neurology

TELEPHONE: (832) 746-5905  
SGAMD@SGAMD.COM  
WWW.SGAMD.COM

5826 New Territory Blvd.  
Suite 803  
Sugar Land, TX 77479  
Houston Metropolitan Area

FORENSIC PSYCHIATRY  
CLINICAL PSYCHIATRY  
LICENSED PHYSICIAN, TEXAS

**Medical Licensure:**

Texas Medical License, Board of Medical Examiners; Q0720

**Board-Certification:**

Board Certified in Psychiatry, American Board of Psychiatry and Neurology  
(Certificate #67625), (2014)

Board-Certified in Forensic Psychiatry, American Board of Psychiatry and Neurology  
(Certificate #2127), (2015)

Board-Certified in Brain Injury Medicine, American Board of Psychiatry and  
Neurology (Certificate #101), (2018)

**Other Certifications:**

Certified Medical Review Officer (MRO), Medical Review Officers Certification  
Council, 2020

**Academic Appointments:**

Assistant Professor of Psychiatry, University of Texas Health and Science  
Center and Forensic Psychiatry mentor to Psychiatric residents (2019-current)

Assistant Professor of Psychiatry, University of Texas Medical Branch (UTMB)  
(2016-2018)

Assistant Professor of Psychiatry, University of Texas Health and Science  
Center (2012-2013, 2015-2016)

TELEPHONE: (832) 746-5905

SGAMD@SGAMD.COM

**SANJAY ADHIA, M.D.**  
PAGE 1 OF 4

## **Professional Experience**

Sanjay Adhia, M.D., Forensic Psychiatrist in private practice (2014-Present)  
Psychiatry Consultant treating brain, stroke and spinal cord injury patients, The Institute of Rehabilitation and Research (TIRR) Memorial Hermann (2019-current)  
Staff Psychiatrist, Avenue 360 Health & Wellness (FQHC clinic treating the Homeless, LGBTQ, Substance Use Disorders, & those with HIV) (2020-current)

### Previous Positions

Medical Director, PACE Mental Health Clinic, Sugar Land, TX (2018-2019)  
Psychiatrist, U.S. District Court, Southern District, Houston, TX (2018-2019)  
Psychiatrist, UTMB-CMC Jester IV Prison Hospital, Richmond, TX (2016-2018)  
Attending Psychiatrist, University of Texas Harris County Psychiatric Center, Competency Restoration Unit, Houston, TX (2015-2016)  
Psychiatrist, Texas State Department of Aging and Disability Services (IDD and Autism), SSLC, Richmond, TX (2014)  
Inpatient Attending Psychiatrist. University of Texas Harris County Psychiatric Center, Houston, TX (2012-2013)

## **Government Appointments**

Appointment to Governor's Advisory Committee to the Texas Board of Criminal Justice on Offenders with Medical or Mental Impairments.  
Appointed and confirmed by the Texas State Senate (2019).  
Additional appointment to the Geriatric Sub-Committee.

## **Volunteer**

Physicians for Human Rights – Asylum Network conducting pro-bono IMEs  
DAYA Houston, pro-bono IMEs for Asian victims of domestic abuse  
Program for Immigrant & Refugee Child Health, Baylor College of Medicine, pro-bono IMEs

## **Professional Affiliations**

American Psychiatric Association  
American Academy of Psychiatry and the Law  
Committee Memberships:  
Forensic Neuropsychiatry  
Human Rights & National Security

TELEPHONE: (832) 746-5905

SGAMD@SGAMD.COM

**SANJAY ADHIA, M.D.**  
PAGE 2 OF 4

Physicians for Human Rights - Asylum Network

**Government Contracts**

U.S. Department of Defense  
Federal Courts  
Please contact Dr. Adhia for CAGE, SAM and DUNS Codes

**Education:**

Forensic Psychiatry Fellowship, Oregon Health & Science University, Portland, Oregon (2014)  
Psychiatry Residency, University of Texas HSC, Houston, Texas (2012)  
Psychiatry Internship, University of Kansas Medical Center, Kansas City, Kansas (2009)  
Doctor of Medicine, M.S. Ramaiah Medical College (2004)

**Awards and Honors:**

Editor-In-Chief of Brain Injury Medicine - Stat Pearls  
Ranked #1, Psychiatry Residency In-Service (PRITE) 2010

**Presentations:**

2012 *Treatment-Resistant Depression* Grand Rounds, University of Texas Health Science Center, 2012, Houston, Texas  
2014 *Psychiatry 101* Lecture, Willamette University College of Law, Salem Oregon  
2014 *Introduction to Forensic Psychiatry* Lecture, Willamette University College of Law, Salem, Oregon  
2015 *Forensic Psychiatry: An Introduction* Resident Lecture, University of Texas Health Science Center, May 2015, Houston, Texas  
2015 *Civil Forensic Psychiatry* Resident Lecture, University of Texas Health Science Center, Houston, Texas  
2017 *Clinical Decision Making, Non-Emergency Compelled Medications*, 6th International Conference on Forensic Research & Technology 9/2017, Houston, Texas

**Publications:**

Naras Bhat, M.D., FACP, Sanjay Adhia, *How to Reverse and Prevent Heart Disease and Cancer*, 1994

TELEPHONE: (832) 746-5905

SGAMD@SGAMD.COM

**Research:**

Cedars-Sinai Medical Center Role of Massage on Depression Study, 2006  
CHAI Study, Coronary artery disease among Houston Asian Indians, 2005  
Carpal Tunnel Glove, Biofeedback and EMG Research, 1996



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 WWW.SGAMD.COM

Houston, Texas  
 (832) 746-5905

FORENSIC PSYCHIATRY  
 CLINICAL PSYCHIATRY  
 LICENSED PHYSICIAN, TEXAS

Fee Schedule

Description	Fee
Forensic Psychiatric Services, including, but not limited to, Independent Medical Examination, Collateral Interviews, review of records, assessments, psychological testing, pleadings including Declarations, consultation, which may include with attorneys, doctors, and other expert witnesses. Drafting report of opinions and findings. Communication by phone, in person and email, Medical research. Including standby time.	\$500/hour prorated in tenths of an hour
Testimony, at deposition or trial, including standby time. (Note cancellation fees below.)	\$650/hour
Travel: "Travel" applies to distances greater than 50 miles from Dr. Adhia's primary business address.  Travel Time (door-to-door) is billed at \$225/hour.  Travel days are charged as an 8-hour minimum. Therefore, actual travel hours are charged at the travel rate, and the balance of an 8-hour day is charged at Dr. Adhia's usual rate of \$500/hr. or \$650/hr.	\$225/hr.  As described
Lodging and meals; airfare car rental, parking, transportation and other costs associated with travel.	At cost.
Cancellation fees apply if a Cancellation is made 5 working days or less:	
Cancellation Fees apply to scheduled testimony, at trial or deposition, or Independent Medical Examination and reflect a 3 hour minimum, except for cancellations which involve Travel.	\$1500.00 or \$1950.00
Cancellation Fees for Travel are as follows, <i>unless agreed otherwise</i> . An amount equal to airfare, lodging or other costs which are non-refundable to Dr. Adhia. Further, a cancellation fee equal to a one 8 hour day at Dr. Adhia's usual rate is due.	See description

TELEPHONE: (832) 746-5905

**SANJAY ADHIA, M.D.**

SGAMD@SGAMD.COM

**SANJAY G. ADHIA, M.D.**  
 Board-Certified in Forensic Psychiatry  
 Board-Certified in Psychiatry  
 Board-Certified in Brain Injury Medicine  
 American Board of Psychiatry and Neurology

TELEPHONE: (832) 746-5905  
 SGAMD@SGAMD.COM  
 WWW.SGAMD.COM

HOUSTON, TEXAS  
 5826 NEW TERRITORY BLVD., SUITE 803  
 SUGAR LAND, TEXAS 77479

FORENSIC PSYCHIATRY  
 CLINICAL PSYCHIATRY  
 LICENSED PHYSICIAN, TEXAS

Date 5/28/20

INVOICE 001

**RETAINING PARTY:**

Karon D. Ramsey  
 Wells & Ramsey LLC  
 1115 East 65th Street  
 Kansas City, Missouri 64131  
 (816) 333-1414  
 karonramsey01@att.net

**CASE:**

*Curtis Anthony Hervey, Plaintiff v. United States of America, et. al., Defendant, case No. 19-4033-SAC-ADM*

Date	Task	Time (tenths of an hour)	Hourly Rate	Subtotal (\$)
5/23/20	Phone Conference with Ms. Ramsey	0.1	500	50
5/24/20	Phone Interview of Mr. Hervey	1.1	500	550
5/24/20	Record Review	0.5	500	250
5/25/20	Phone Conference with Ms. Ramsey	0.3	500	150
5/27/20	Record Review	0.7	500	350
5/28/20	Report Preparation	2.3	500	1150
<del>5/28/20</del>	<del>Phone Conference with Ms. Ramsey</del>	<del>0.3</del>	<del>500</del>	<del>150</del>
<del>5/28/20</del>	<del>Report Preparation</del>	<del>0.4</del>	<del>500</del>	<del>200</del>
Sub-Total		5.7	500	2850
<b>TOTAL</b>		<b>5.0</b>	<b>500</b>	<b>2500</b>

Write Off = \$350

**Total Due = 0\$ (Retainer \$2500)**

**Testimony History:**

- 1) State of Oregon vs. Zachary Michael Guzman; Competency to Stand Trial; Expert from the Oregon State Hospital; Malheur County Courthouse Vale, Oregon; 2/26/14
- 2) State of Georgia vs. Natasha Newman; Driving Under the Influence; Defense Expert; Fulton County Court, Atlanta Georgia; 2/6/19

**Deposition History:**

- 1) Baldwin v. Harris County Sheriff Department et al, No. 4:2016cv02966  
Plaintiff's Expert; US 1983 Civil Rights; 11/15/18
- 2) Estate of Wilma Thomason v. SRP, Ocean, Plaintiff Expert; Medical Malpractice; 12/13/18
- 3) Mario Parra Fenech vs Rama Indigo Falls, LLC d/b/a Cabo San Lucas II Apartments, Case #: 2017-373350; Plaintiff's Expert, Personal Injury; 3/13/20

...

- [Kansas.gov](http://www.kansas.gov) (<http://www.kansas.gov>)
- [State Phone Directory](http://www.da.ks.gov/phonebook/) (<http://www.da.ks.gov/phonebook/>)
- [Online Services](http://www.kansas.gov/services/) (<http://www.kansas.gov/services/>)

## **KSBHA Licensee & Registrant Profile Search**

- [Home](/ssrv-ksbhada/search.html) (</ssrv-ksbhada/search.html>)
- [KSBHA Web site](http://www.ksbha.org) (<http://www.ksbha.org>)
- [Contact Information](/ssrv-ksbhada/contact.html) (</ssrv-ksbhada/contact.html>)
- [Help](/ssrv-ksbhada/help.html) (</ssrv-ksbhada/help.html>)

### **Detailed Search Results**

#### **Student/Postgraduate License (</ssrv-ksbhada/help.html#studentLicense>) Profile for Sanjay G. Adhia**

##### **Personal Information**

**Profession:** POSTGRADUATE MD/DO

##### **Address:**

Kansas University Medical Cen  
3901 Rainbow Blvd  
Kansas City, KS, 66160

**Phone:**

**Fax:**

**Year of Birth:** 1975

- **School Name:** Bangalore Med Coll Bangalore U
- **Degree Date:** 01/31/2004

##### **License Information**

- **License Number:** 94-06750
- **License Type:** Cancelled
- **License Status:** Previous
- **License Expiration Date:** 06/30/2011
- **Original License Date:** 07/01/2007
- **Last Renewal Date:** 07/01/2007
- **Date This Status:** 07/01/2009
- **Continuing Education Year:**
- **Temporary License Permit Number:**
- **Temporary License Permit Issue Date:**
- **Temporary License Permit Expiration Date:**

##### **Practice Specialty**

EXHIBIT D

Specialties and board certifications are for M.D.s and D.O.s only and are self-reported. Therefore, they are not independently verified by the Board of Healing Arts.

### Other ~~KSBHA~~ Licenses

None Reported

### ~~KSBHA~~ Actions

None Reported

### Health Care Facility Privilege Actions

None Reported

### Other Public License Actions, ~~DEA~~ Actions, Criminal Actions, or Miscellaneous Information

None Reported

### Statement from Licensee or Registrant

None Reported

**Perform Another Search**     **Return to Search Results**

License Profile last updated: July 9, 2022

- **Contact Information** (</ssrv-ksbhada/contact.html>)
- **Disclaimer** (</ssrv-ksbhada/disclaimer.html>)
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- **Help Center** (<http://www.kansas.gov/help-center/>)
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# Texas Medical Board

## Healthcare Provider Verification / Profile

[Search](#) [Back](#) [Print Verification](#)

### Physician License

**NAME:** SANJAY GAUTAM ADHIA, MD

**LICENSE:** Q0720

**INFORMATION CURRENT AS OF:** 7/10/2022

**CURRENT STATUS:** ACTIVE

[Click here for a detailed information on what each section below contains.](#)

**THE INFORMATION IN THIS BOX HAS BEEN VERIFIED BY THE TEXAS MEDICAL BOARD**

#### Verified Information

**Year of Birth:** 1975

**License Number:** Q0720 Physician License

**Issuance Date:** 06/27/2014

**Expiration Date:** 08/31/2024

**Current Status:** ACTIVE as of 08/06/2014

**Disciplinary Restrictions:** NONE

**Non-Disciplinary Restrictions:** NONE

**Specialties:**

**School of Graduation:**

M S RAMAIAH MEDICAL COLLEGE, BANGALORE UNIVERSITY, KARNATAKA  
2003

**+ Current Board Action**

**+ Medical Malpractice Investigations**

**THE INFORMATION IN THESE SECTIONS WAS REPORTED BY THE LICENSEE AND MAY  
HAVE NOT BEEN VERIFIED BY THE TEXAS MEDICAL BOARD**

#### Self Reported Information

**Gender:** MALE

**Place of Birth:** MICHIGAN

**Race:** ASIAN

**Current Primary Practice Address:**

1333 MOURSUND STREET  
HOUSTON, TX 77030

**Years of Active Practice in the U.S. or Canada:**

15 year(s)

**Years of Active Practice in Texas:**

12 year(s)

**+ Specialty Board Certification**

**+ Specialties**

**- Education**

**Name, Location and Graduation Date of All Medical Schools Attended**

**Name:** M.S. RAMAIAH MEDICAL COLLEGE, BANGALORE UNIVERSITY,  
KARNATAKA

**Location:**

**Graduation Date:** 04/2003

**Graduate Medical Education In The United States Or Canada**

**Program Name:** University of Texas

**Location:** Houston/TX

**Begin Date:** 07/2009

**End Date:** 06/2012

**Type:** RESIDENCY

**Specialty:** Psychiatry

**Program Name:** University of Kansas

**Location:** Kansas City/KS

**Begin Date:** 07/2007

**End Date:** 06/2009

**Type:** RESIDENCY

**Specialty:** Psychiatry

**Program Name:** ohsu

**Location:** Portland/OR

**Begin Date:** 09/2013

**End Date:** 08/2014

**Type:** FELLOWSHIP

**Specialty:** Forensic Psychiatry

- + Hospital Privileges**
- + Utilization Review**
- + Patient Services**
- + Awards, Honors, Publications**
- + Malpractice Information**
- + Criminal History**
- + Non-TMB Disciplinary Actions**
- + Physician Assistant Supervision**
- + Advanced Practice Nurse Delegation**
- + Summary of all Licenses**

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Please contact the TMB Call Center at (512) 305-7030 for assistance.



## **ANGELA CAMPAGNA LCSW, MSW**

Owner and Lead Clinician Face2Face Therapy LLC

Conway AR 72032

Cell: 501-514-0417

[CampagnaAngela@yahoo.com](mailto:CampagnaAngela@yahoo.com)

### **License and Clinical Skills**

---

**Licensed Certified Social Worker in the State of Arkansas #8136-C**  
**Expert in various mental health disorders to include diagnosing, psychoeducation and interventions.**

### **Work Experience**

---

#### **OWNER AND LEAD CLINICIAN FACE2FACE THERAPY LLC- JULY 11, 2018 TO PRESENT**

As owner and lead clinician of Face2Face therapy I provide psychotherapy and counseling to individuals, couples, families and children. My practice includes Motivational Interviewing, Cognitive Behavioral Therapy, Dialectical Behavioral Therapy, Problem Solving Therapy, Play Therapy and other forms of therapy as needed. I manage scheduling, billing and all office and business needs.

#### **SHAW ASSOCIATES Krakow, Poland - Sep 2017 to July 2018**

As a clinician in international private practice setting I provided psychotherapy to individuals, couples, families and children. I employed evidence based therapies to fit the specific scenarios for each client. Examples of these therapies were Problem Solving Therapy, Cognitive Behavioral Therapy, Dialectical Behavioral Therapy, and Seeking Safety; demonstrating possession of advanced practice skills and judgement. I also provided confidential mental health support to medical students from various universities. This often consisted of, but was not limited to stress management, school and home life balance, anger management and substance abuse. I managed all aspects of this program. In this therapist role I also served as an advocate to schools that my clients are attending upon their request. As a licensed therapist I provided education to the local schools and students on how to better manage distress tolerance, stress management, and suicide prevention to high risk individuals. I wrote and developed policy and procedures for the program that was a contract with the universities. In addition, I employed knowledge and skill in management and administration which included supervision, consultation, negotiation and monitoring of the program and policies that I created and employed in the private practice. I provided consultations to other therapists who were working with high risk individuals who were having suicidal ideation and homicidal ideation. I maintained social media sites and stay connected to supportive groups in the community in order to bridge support to my clients as needed. Maintained and tracked all cases.

#### **COMMUNITY LIAISON OFFICER (CLO)- U.S. Department of State- Krakow, Poland - Nov 2015 to Jan 2017**

As CLO I managed eight areas of responsibility inside U.S. Consulate Krakow. These

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Conway AR 72032

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responsibilities were as follows: employment liaison, crisis management, security liaison, education liaison, information and resource management, guidance and referral, welcoming and orientation, community liaison and event planning.

In this position, I worked closely with multiple departments in Krakow both American and Polish staff and senior departments in Washington D.C. I also briefed the Regional Psychiatrist and Medical Doctor as needed on individuals that may be high risk. I briefed weekly the Consulate General on needs of the community and moral concerns. I collected data and provided reports to senior management within the State Department, these reports were presented to Ambassadors in the Office of Inspector General (OIG). In addition, I gathered data on the living status and provided information to new comers who would join the consulate team. I Used this data to develop policy and procedures to better assist the community at post and their dynamic transitions. I created and managed a program to assist new comers to post by providing resources and customized support to both adults and children. In doing this I provided education on cultural diversity and supportive psychotherapy to assist them while being assigned to U.S. Consulate Krakow.

Specifically, I created a sponsor program and provided guidelines to connect new comers with families whom are already settled in Krakow to assist newcomers with support to overcome cultural differences and reduce the stress of moving to a new place for the whole family. I was an active member of the Emergency Action Committee and Safety and Health Management Committee to develop safe procedures for officers and families. I provided event planning for the U.S. Consulate General for functions that were open to members of the consulate staff. I also created and managed multiple fund raising efforts to support various groups in Krakow. During this I collaborated with numerous entities within the consulate mission and also Polish vendors and supports while managing a limited budget. I provided support and gave presentations to visitors who would come to U.S. Consulate Krakow.

### **CLINICAL SOCIAL WORKER – Northern Virginia Mental Health Institute – Fairfax, VA – Oct 2013– Dec 2015**

I provided clinical social work services to patients who were admitted in an inpatient state psychiatric hospital. These patients were high risk individuals who were suicidal or homicidal and a danger to themself or others. I assessed the psychosocial needs of patients and their support systems, and based on the assessments, provide treatment which facilitated the discharge of the patient at their highest level of functioning, in order that the patient effectively adapted within their family and community.

I coordinated with outside support groups to ensure that they had a discharge plan that could support them in the community. This included treatment for Post Traumatic Stress Disorder, depression, trauma, substance abuse, and co-existing diagnoses often with suicidal ideation and often previous attempts of suicide. I was a primary therapist and diagnosed patients according to the DSM. I independently developed, implemented and maintain individualized treatment plans for clients while serving as a member of interdisciplinary team. In addition, I provided support to families and significant others and community agencies. I formed

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therapeutic relationships with clients and families and formed effective partnerships with other community supports. I ensured completion of the patients needs upon discharge and completed all mandated documentation. I frequently created safety and support plans for patients and family to follow in their home and work environments to alleviate crisis. I also established processes and outcomes for the treatment planning sessions; revised plans as needed to accommodate changing patient needs and provided optimal interventions and notified after care support groups of patients needs, while obtaining patient's consent prior to involving family, significant others, and community social supports; in accordance with HIPPA guidelines.

Also, I ensured all notes and documentation were completed according to departmental standards and conducted individual and group psychotherapy and provided individual treatment as prescribed by the treatment plan, while documenting all interventions and progress during treatment. I used the highest levels of communication, respect, optimism, safety and team work, in order to better serve the clients.

I served as an active member of the Utilization Management Committee, which collected data and revised findings in order to evaluate the effectiveness of programs and to better assist and provide support of high risk individuals. In this role I updated and wrote policy, procedures and practice guidelines for the clinical side of the hospital. I provided supervision, consultation, negotiation and monitoring of programs with a multidiscipline treatment team in the hospital to include, the social work department, medical and nursing staff, psychiatry department, psychology department and various support departments such as exercise therapist, art therapist and occupational therapists. I routinely trained new clinicians and provided clinical guidance and oversight to interns in a clinical educational environment. I managed and facilitated a bi-weekly family support group program, specific to family members of patients. I always employed culturally sensitive interventions and ensured that patients needs were met. In addition, I often resolved conflict with patients and their outside supports such as employers, schools, apartment complexes and families. This often required joint meetings and education on communication and conflict resolution and mediation. I exercised the ability to organize work, set priorities, meet multiple deadlines and evaluate assigned programs with both short and long term goals and assignments. I facilitated group therapy and training groups to staff.

**CRISIS COUNSELOR-** Brandon House Crisis Center – Manassas, VA-Jan 2013 to Sep 2013 Conducted psychosocial assessments to evaluate and assess clients in various crisis situations and provided appropriate interventions. Assisted clients in creating personalized Wellness Recovery Actions Plans, and develop safety and support plans, to assist clients in returning to the community. Outlined treatment plans for clients to assist them in returning to work and home life. Provided case management and assisted clients with resources such as social security, disability, money management and client centered social supports. Spearheaded an educational outreach program that provided psycho educational programs to clients in group settings. Educated clients individually and in support group settings.

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I provided psychotherapy on a broad range of stress management interventions using dialectical behavioral therapy, cognitive behaviors and seeking safety and other evidence based interventions while employing trauma sensitive interventions. Facilitated psychotherapy groups which included anger management, cognitive distortions and how to challenge cognitive distortions, how to increase laugh life, positive psychology, music therapy, art therapy, sand tray therapy, single parenting, and managing stress associated with care giving to elderly parents. Provided family psychotherapy groups and individual family therapy to families managing crisis and trauma. Employed Motivational Interviewing Techniques and twelve step programs to assist clients with addictions such as alcohol dependency, drug dependency, and eating disorders. Provided culturally sensitive interventions, managed multi cultural groups, and assisted clients in interpersonal relationships. Provided interventions and mediated disputes between members of groups, employers and families. Briefed the Mental Health Director weekly on complicated cases and concerns. Worked with and briefed Psychiatrist on clients as needed and provided Psychiatrist with assessments to assist in diagnoses and discussed pharmacological interventions. Provided expert assistance to county psychiatric hospital, case managers and family members of clients to ensure that the clients received the support they needed to succeed in the community. Created and facilitated educational program in order to educate staff on proper therapeutic interventions to use when responding to clients who have experienced trauma, how to provide trauma sensitive interventions and how to manage and be aware of vicarious trauma.

**MENTAL HEALTH SOCIAL WORKER INTERNSHIP – Fellowship Health Resources – Arlington, VA Jun 2012– Dec 20 12**

Conducted intakes and provided assessments and diagnosis for new clients with supervision of LCSW. Maintained case files and reports for billing for contractors, Medicaid and Medicare. Made referrals as needed and provided case management to assist clients with applying for medical and financial services. Also, provided at home visits giving supportive counseling to assist clients in their daily living. Visited clients when hospitalized and provided supportive counseling. Provided supportive counseling to clients that are victims of spousal abuse and provided advice to case managers and courts pertaining to clients being served. Consulted clients diagnosed with medical problems and provided education on medical illness and provided medication management. Clients served during this time were diagnosed with a broad scope of mental health diagnosis to include: bi-polar disorder, personality disorders clusters, Major Depressive Disorder, Dysthymic Disorder, Schizophrenia, Post Traumatic Stress Disorder, and Obsessive Compulsive Disorder. Created Person Centered treatment plans for individual clients and employed evidence based interventions such as Cognitive Behavioral Therapy, Dialectic Behavioral Therapy, Motivational Interviewing and Interpersonal Psychotherapy. Created a treatment program and employed an intervention involving an art group as the therapist and assisted clients in social skills and finding alternatives ways of expression and stress management. Created and initiated an original group therapy program and was the lead therapist

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in the group which addressed difficulties living in facilities that were isolated and in close quarters. As the lead therapist employed communication and problem solving techniques to assisted the clients in managing stresses associate with living in a diverse environment. Was agency specialist on hoarding and working with individuals with hoarding tendencies. Developed and presented self care orientation training program to employees to assist in burn out prevention and empathy fatigue prevention. Met weekly with treatments teams to engage in problem solving pertaining client care.

**US AMBASSADORS ASSISTANT – U.S. Department of State – Cairo, Egypt Aug**

**2008– Dec 2009**

- Provided human resources assistance to employees within the Department of States

**DEPARTMENT OF DEFENSE ANALYST – Secretary of Defense – Pentagon Oct 2005– Jun 2008**

- Provided analytical and writing support with Top Secret Security Clearance

**UNITED STATES MARINE 1996 -2005**

### **Education**

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- University of Southern California Master's Degree Clinical Social Work 08/2013
- University of Argosy Bachelors of Arts Degree in Psychology 08/2010
- Veteran of United State Marine Corps Nine years enlisted DD-214 can be provided upon request.



**FACE2FACE**  
THERAPY LLC

Fee charges are as follows:

Diagnostic and Evaluation Session (First Session)	\$225
Regular Office Visit (60 Minute Session)	\$175
Every following 30 minutes	\$85
Self Pay Diagnostic and Evaluation Session (First Session)	\$185
Self Pay Regular Office Visit (60 Minute Session)	\$150
Every following 30 minutes	\$75
Outside Office Work (collaborative law services per hour)	\$300
Testify at trial or deposition	\$300
Self Pay Nutrition Intake Session (60 minutes)	\$140
Self Pay Nutrition Follow-up (30 minutes)	\$50
Every following 15 minutes	\$25
ESA/Academic/Legal/Life/Other Letters	\$35
Copy of full chart	\$40
Copy of Diagnostic Evaluation	\$20
NO SHOW FEE	\$35

Payment of fees, including any required copays/coinsurance/deductible, is expected at the time of each appointment. If you are using insurance benefits, Face2Face Therapy will file insurance claims for you and will honor any contractual agreements with managed health care companies or Employee Assistance Program that have specific reimbursement restrictions and claim requirements.

I understand that if I miss a scheduled appointment and I do not provide at least 24 hours notice by phone text, phone call, or if the absence is not due to an illness or emergency, I agree to pay a late cancellation fee of \$35.

(Clement weather closings are followed by local school district closings.)

\_\_\_\_\_  
Client Signature \_\_\_\_\_  
Date

\_\_\_\_\_  
Guardian Signature (if under 18) \_\_\_\_\_  
Date

\_\_\_\_\_  
Therapist/Counselor Signature \_\_\_\_\_  
Date