

STATE OF NEW YORK : DEPARTMENT OF HEALTH
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

IN THE MATTER

OF

ROBBAN A. SICA, M.D.

**CONSENT
AGREEMENT
AND
ORDER**
BPMC No. 02-10

ROBBAN A. SICA, M.D., says:

On or about May 9, 1995, I was licenced to practice medicine as a physician in the State of New York, having been issued License No. 199255 by the New York State Education Department. My current residential address is 37 Lakewood Road, Trumbull, CT 06611.

I am applying to the State Board for Professional Medical Conduct for a Consent Agreement and Order, pursuant to Section 230-a(6) of the Public Health Law, imposing a permanent limitation on registration as a physician in the State of New York, and I request that the Board issue this Consent Agreement and Order. My New York registration expired on March 31, 2001. I agree that I shall not renew my New York registration.

I understand that I have been charged with a violation of Education Law Section 6530(18) as set forth in the Statement of Charges, annexed hereto, made a part hereof, and marked as Exhibit "A".

Subject to the terms, conditions and limitations of this Consent Agreement and Order, I agree not to contest the allegations and specifications set forth in the Statement of Charges in full satisfaction of all such allegations and specifications.

I agree that, in the event the State Board for Professional Medical Conduct agrees with my proposal, this Consent Agreement and Order shall be issued limiting my registration such that I shall not renew my registration in New York State.

In addition, I agree that this Consent Agreement and Order shall be effective upon issuance by the Board, which may be accomplished by mailing, by first class mail, a copy of this Consent Agreement and Order to me at the address set forth above, or to my attorney, or upon transmission via facsimile to me or my attorney, whichever is earliest.

With respect to all of the 32 medical professional service corporations that I ever organized, established or owned, which are identified in the list annexed hereto, made a part hereof, and marked as Exhibit "B," I agree to verify that I have properly dissolved these entities, or to verify that I have properly divested myself of all proprietary, financial or managerial interest in these entities, or to consent to the revocation of the certificate of incorporation of these entities, in accordance with all of the applicable requirements of the Departments of State, Education, and Taxation and Finance, according to the following terms:

1. **Entities Identified in Exhibit "B"** - I hereby warrant that the 32 entities set forth in Exhibit "B" to this Consent Agreement and Order are the only medical

professional service corporations, medical professional limited liability corporations, sole medical proprietorships, physician's offices, medical partnerships, or registered medical limited liability partnerships that I have organized, established, or owned in the State of New York. I also hereby warrant that the names of the 32 entities set forth in Exhibit "B" to this Consent Agreement and Order are accurately presented therein and correspond precisely to the names of the 32 entities that I organized, established, or owned in the State of New York.

2. **Dissolved Entities** - With respect to all of the medical professional service corporations that I have already dissolved, I shall verify within 15 days from the effective date of this Consent Agreement and Order that dissolution has occurred in accordance with all of the applicable requirements of the Departments of State, Education, and Taxation and Finance. I shall notify the Office of Professional Medical Conduct of such verification of dissolution within 30 days from the effective date of this Consent Agreement and Order. However, if any applicable requirement has not been met, then I shall notify the Office of Professional Medical Conduct in writing of such non-dissolution within 30 days from the effective date of this Consent Agreement and Order. This notification shall also state that I have the necessary corporate authority to consent to the revocation of that entity's certificate of incorporation, and that I do so consent. Along with the notification and within same time frame for the notification, I shall fully execute the attached Consent Agreement and Order corresponding to the particular non-dissolved entity and submit it to the Office of Professional Medical Conduct. Such revocation shall be effective immediately and shall be self-executing, and the Consent Agreement and Order corresponding to that particular entity shall be deemed automatically to be the final and operative document

revoking that entity's certificate of incorporation or certificate of registration.

Notwithstanding the above, nothing herein shall be construed to absolve the medical professional service corporations relevant to this paragraph 2 in any way from paying to the Departments of State, Education, and Taxation and Finance any outstanding taxes, fines and penalties. Within 15 days from the effective date of this Consent Agreement and Order, and with respect to each of the entities relevant to this paragraph 2, I shall advise the persons and organizations with which I have had a contractual relationship that: (a) I am no longer practicing medicine in the State of New York; (b) the entity may no longer practice medicine in the State of New York; and (c) no other person or organization may practice medicine through or in the name of such entity. In addition, with respect to each of the entities relevant to this paragraph 2, I shall use my best efforts to secure for me and my designees, including, but not limited to, the Department of Health, the Office of Professional Medical Conduct, and the Department of Education, unconditional rights concerning access to, inspection of, borrowing of, and copying of all records, including original records, of each such entity pertaining to the time period during which I was a shareholder of that entity, upon the provision of advance notification that is reasonable under the circumstances. For purposes of this paragraph 2, my obligation to use "my best efforts" shall mean making an oral and a written demand for any such records which I do not already possess and shall not include legal actions to be taken by me to compel delivery or production of records of any such entity that are being withheld from me. I acknowledge that nothing in this sentence shall be construed to prevent the Department of Health, the Office of Professional Medical Conduct, and the Department of Education from commencing administrative or legal actions to compel delivery or production of records by

any such entity to the Department of Health, the Office of Professional Medical Conduct, and the Department of Education as my assignee or otherwise in their own right.

3. **Divested Entities** - With respect to all of the medical professional service corporations for which I have already divested myself of all proprietary, financial or managerial interest, I shall verify within 15 days from the effective date of this Consent Agreement and Order that divestiture has occurred in accordance with all of the applicable requirements of the Departments of State, Education, and Taxation and Finance. I shall notify the Office of Professional Medical Conduct of such verification of divestiture within 30 days from the effective date of this Consent Agreement and Order. However, if any applicable requirement has not been met, then I shall notify the Office of Professional Medical Conduct in writing of such non-divestiture within 30 days from the effective date of this Consent Agreement and Order. This notification shall also state that I have the necessary corporate authority to consent to the revocation of that entity's certificate of incorporation, and that I do so consent. Along with the notification and within same time frame for the notification, I shall fully execute the attached Consent Agreement and Order corresponding to the particular non-divested entity and submit it to the Office of Professional Medical Conduct. Such revocation shall be effective immediately and shall be self-executing, and the Consent Agreement and Order corresponding to that particular entity shall be deemed automatically to be the final and operative document revoking that entity's certificate of incorporation. Notwithstanding the above, nothing herein shall be construed to absolve the medical professional service corporations relevant to this paragraph 3 in any way from paying to the Departments of State, Education, and Taxation

and Finance any outstanding taxes, fines and penalties. Within 15 days from the effective date of this Consent Agreement and Order, and with respect to each of the entities relevant to this paragraph 3 for which I cannot verify that divestiture has occurred in accord with all of the applicable requirements of the Departments of State, Education, and Taxation and Finance, I shall advise the persons and organizations with which I have had a contractual relationship that: (a) I am no longer practicing medicine in the State of New York; (b) the entity may no longer practice medicine in the State of New York; and (c) no other person or organization may practice medicine through or in the name of such entity. In addition, with respect to each of the entities relevant to this paragraph 3, I shall use my best efforts to secure for me and my designees, including, but not limited to, the Department of Health, the Office of Professional Medical Conduct, and the Department of Education, unconditional rights concerning access to, inspection of, borrowing of, and copying of all records, including original records, of each such entity pertaining to the time period during which I was a shareholder of that entity, upon the provision of advance notification that is reasonable under the circumstances. For purposes of this paragraph 3, my obligation to use "my best efforts" shall mean making an oral and a written demand for any such records which I do not already possess and shall not include legal actions to be taken by me to compel delivery or production of records of any such entity that are being withheld from me. I acknowledge that nothing in this paragraph shall be construed to prevent the Department of Health, the Office of Professional Medical Conduct, and the Department of Education from commencing administrative or legal actions to compel delivery or production of records by any such entity to the Department of Health, the Office of Professional Medical Conduct, and the Department of Education as my assignee or

otherwise in their own right.

4. **Entities Neither Dissolved Nor Divested** - With respect to all of the medical professional service corporations that I have ever organized, established or owned in the State of New York, but which have not already been dissolved, or for which I have not already divested myself of all proprietary, financial or managerial interest, or for which I have merely assigned shares back to the entity, I hereby warrant that I have the necessary corporate authority to consent to the revocation of each entity's certificate of incorporation, and I do hereby so consent. Simultaneously with the execution of this Consent Agreement and Order, I shall fully execute the attached Consent Agreement and Order corresponding to each particular entity relevant to this paragraph 4 and submit it to the Office of Professional Medical Conduct. Such revocation shall be effective immediately and shall be self-executing, and the Consent Agreement and Order corresponding to that particular entity shall be deemed automatically to be the final and operative document revoking that entity's certificate of incorporation. Notwithstanding the above, nothing herein shall be construed to absolve the entities relevant to this paragraph 4 in any way from paying to the Departments of State, Education, and Taxation and Finance any outstanding taxes, fines and penalties. I shall retain for a period of 6 years after the effective date of this Consent Agreement and Order physical possession of all records, including original records, of these entities, including, but not limited to, all billing and corporate records that I now possess or hereafter secure. Within 15 days of the effective date of this Consent Agreement and Order, and with respect to each of the entities relevant to this paragraph 4, I shall advise the persons and organizations with which I have had a contractual relationship that: (a) I am no longer practicing medicine in the State of New York; (b) the

entity may no longer practice medicine in the State of New York; and (c) no other person or organization may practice medicine through or in the name of such entity. In addition, with respect to each of the entities relevant to this paragraph 4, I shall use my best efforts to secure for me and my designees, including, but not limited to, the Department of Health, the Office of Professional Medical Conduct, and the Department of Education, unconditional rights concerning access to, inspection of, borrowing of, and copying of all records, including original records, of each such entity pertaining to the time period during which I was a shareholder of that entity, upon the provision of advance notification that is reasonable under the circumstances. For purposes of this paragraph 4, my obligation to use "my best efforts" shall mean making an oral and a written demand for any such records I do not already possess and shall not include legal actions by me to compel delivery or production of records of any such entity that are being withheld from me, but I acknowledge that nothing in this sentence shall be construed to prevent the Department of Health, the Office of Professional Medical Conduct, and the Department of Education from commencing administrative or legal actions to compel delivery or production of records by any such entity to the Department of Health, the Office of Professional Medical Conduct, and the Department of Education as my assignee or otherwise in their own right.

5. **Violations or Non-Compliance** - I agree that willful violations or non-compliance with any of the conditions or limitations set forth in paragraphs 1 through 4 above may be prosecuted by the Office of Professional Medical Conduct as misconduct under Education Law 6530(29) or any other applicable subdivision in accordance with the pre-hearing procedures and hearing procedures as is provided in Title II-A of Article 2 of the Public Health Law. However, prior to prosecuting such violation or non-compliance, the

Office of Professional Medical Conduct shall send to me and my attorneys identified below by first class mail a written notice describing my violation of, or non-compliance with, any such provision, and I shall first be afforded 15 days from the date of mailing of that notice to correct such violation, end such non-compliance, or otherwise respond to that notice.

6. **Cooperation** - I shall voluntarily and willingly use my best efforts to participate directly or indirectly in the investigation and/or prosecution by the Department of Health, the Office of Professional Medical Conduct, or the Department of Education, of any person who has practiced, or is practicing, any of the professions that are regulated under Title VIII of the Education Law or Title II-A of Article 2 of the Public Health Law (e.g., physicians, chiropractors, physical therapists and others), while that person was affiliated in any way with the 32 entities set forth in Exhibit "B" to this Consent Agreement and Order. In addition, I shall voluntarily and willingly use my best efforts to participate directly or indirectly in the investigation and/or prosecution by the Department of Health, the Office of Professional Medical Conduct, or the Department of Education, of any person who practiced, or is practicing, any of the professions that are regulated under Title VIII of the Education Law or Title II-A of Article 2 of the Public Health Law (e.g. physicians, chiropractors, physical therapists and others), while that person was affiliated in any way with any medical professional service corporations in the State of New York that either preceded or succeeded my organization, establishment, or ownership of the 32 entities set forth in Exhibit "B" to this Consent Agreement and Order. I also shall voluntarily and willingly use my best efforts to participate directly or indirectly in the investigation and/or prosecution by the Department of Health, the Office of Professional Medical Conduct, or the Department of Education, of MD#1, who is identified in a separate confidential

document, and any medical professional service corporations, medical professional limited liability corporations, sole medical proprietorships, physician's offices, medical partnerships, or registered medical limited liability partnerships, or any person, that MD#1 was affiliated with, or that MD#1 ever organized, established, or owned in the State of New York. Such participation in the investigation and/or prosecution of such persons or entities shall be at my non-reimbursable time and expense and shall include, but not be limited to, providing documents (but not those documents that have been provided previously), responding to telephone inquiries, attending meetings or testifying at hearings in Troy, New York, or elsewhere as determined by the Department of Health or the Department of Education, and otherwise sharing information and recollection. In the course of participating in the investigation or prosecution of the persons and entities discussed in this paragraph, I shall provide, to the best of my knowledge, information and recollection, as well as documents (but not those documents that have been provided previously), concerning, at a minimum, the topics outlined in Exhibit "C," which is annexed hereto and made a part hereof. In determining what shall constitute my "best efforts," the Department of Health and the Department of Education and I agree that: (1) I reside and actively practice medicine in Connecticut; (2) any required trips to New York City or Albany will involve a minimum of two or three hours of travel one way, respectively; and (3) medical and business records of the 32 entities set forth in Exhibit "B" to this Consent Agreement and Order may or may not be readily available to me. In deference to these considerations, interviews or meetings shall be scheduled with mutual professional courtesy in mind for dates preferably in a range of 10 to 20 days from the date of the request unless circumstances reasonably warrant more or less notice. Hearings, which hearing

committees and administrative law judges schedule in their sole discretion, not necessarily with mutual professional courtesy in mind, shall be accompanied with as much notice as is reasonably possible under the particular circumstances. Similarly, records shall be produced within a reasonable time frame as warranted by the particular circumstances and in accord with mutual professional courtesy. Further, my obligations under this paragraph shall cease 2 years after the effective date of this Consent Agreement and Order unless mutual professional courtesy requires a reasonable extension. I agree that willful violations or non-compliance with any of the conditions or limitations set forth in this paragraph may be prosecuted by the Office of Professional Medical Conduct as misconduct under Education Law 6530(29) or any other applicable subdivision in accordance with the pre-hearing procedures and hearing procedures as is provided in Title II-A of Article 2 of the Public Health Law. However, prior to prosecuting such violation or non-compliance, the Office of Professional Medical Conduct shall send to me by first class mail a written notice describing my violation of, or non-compliance with, any such provision, and I shall first be afforded 15 days from the date of mailing of that notice to correct such violation, end such non-compliance, or otherwise respond to that notice.

I hereby warrant that I have never owned, and do not now own, solely or in conjunction with others, a "hospital" as defined in Section 2801(1) of the Public Health Law. Although I have a right under Article 28 of the Public Health Law to submit to the Department of Health an application to establish a "hospital," the definition of which in Section 2801(1) of the Public Health Law includes a "public health center," "diagnostic center," "treatment center," and "rehabilitation center," I do not presently intend to submit

an application for establishment of a "hospital" at any time in the future because I currently practice in Connecticut. If circumstances were to change and I were to submit an application to establish a "hospital," I agree to submit a copy of the application simultaneously to the Office of Professional Medical Conduct.

I shall fully cooperate in every respect with the Office of Professional Medical Conduct, particularly the Physician Monitoring Program, in its administration and enforcement of this Consent Agreement and Order by providing written responses, attending meetings or providing documentation concerning verification of my compliance with the terms of this Consent Agreement and Order.

I shall submit to the Office of Professional Medical Conduct written notification of my professional and residential addresses and telephone numbers within or without the State of New York as of the effective date of this Consent Agreement and Order. I shall submit to the Office of Professional Medical Conduct written notification of residential address and telephone number changes within 30 days of such changes.

I agree that in the event I am charged with professional misconduct in the future for violation or non-compliance with any provision of this Consent Agreement and Order, or in the event I am charged with professional misconduct in the future for any other type of misconduct, this Consent Agreement and Order shall be admitted into evidence in that proceeding.

I shall submit all notices or documents referred to herein to the Director of the New York State Department of Health Office of Professional Medical Conduct, Hedley Park Place, 433 River Street, Suite 303, Troy, NY 12180-2299.

I shall, within 15 days of the effective date of this Consent Agreement and Order, return any unused New York State official prescription forms to the Bureau of Controlled Substances of the New York State Department of Health. I also shall cause all prescription pads bearing my name to be destroyed.

I understand that, in the event that this proposed agreement is not granted by the State Board for Professional Medical Conduct, nothing contained herein shall be binding upon me or construed to be an admission of any act of misconduct alleged or charged against me, such proposed agreement shall not be used against me in any way, and shall be kept in strict confidence during the pendency of the professional misconduct disciplinary proceeding; and such denial by the State Board for Professional Medical Conduct shall be made without prejudice to the continuance of any disciplinary proceeding and the final determination by a Committee on Professional Medical Conduct pursuant to the provisions of the Public Health Law.

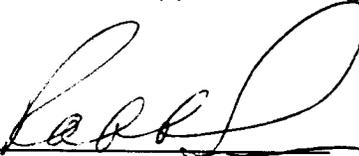
I contend that none of my actions with regard to the 32 entities set forth in Exhibit "B" to this Consent Agreement and Order has resulted in patient harm.

I contend that I have cooperated with the Office of Professional Medical Conduct

investigation commenced in July 1999.

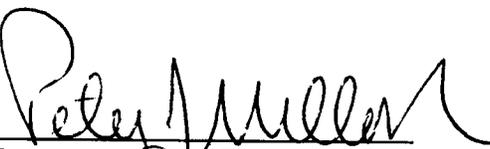
I am making this application of my own free will and accord and not under duress, compulsion or restraint of any kind or manner. In consideration of the value to me of the acceptance by the Board of this application allowing me to resolve this matter without the various risks and burdens of a hearing on the merits, I knowingly waive any right I may have to contest, whether administratively or judicially, the Consent Agreement and Order issued hereunder for which I hereby apply and I ask that the application be granted.

Date: November 21, 2001


Robban A. Sica, M.D.
Respondent

AGREED TO:

Date: October 25, 2001


Peter J. Millock, Esq.
Attorney for Respondent
Robban A. Sica, M.D.
Nixon Peabody LLP
Omni Plaza
30 South Pearl Street
Albany, NY 12207

Date: Dec 4, 2001


Jacques G. Simon, Esq.
Attorney for Respondent
Robban A. Sica, M.D.
299 Broadway, Suite 1700
New York, NY 10007

Date: December 10, 2001


Richard J. Zahnleuter, Esq.
Associate Counsel
Bureau of Professional
Medical Conduct

Date: January 8, 2001 ^{2nd}


Dennis J. Graziano
Director, Office of
Professional Medical Conduct

STATE OF NEW YORK : DEPARTMENT OF HEALTH
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

IN THE MATTER
OF
ROBBAN A. SICA, M.D.

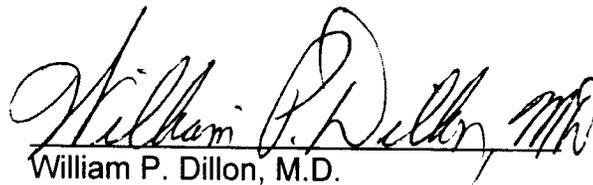
ORDER

Upon the proposed Consent Agreement and Order of Robban A. Sica, which proposed agreement is made a part hereof, it is AGREED TO and

ORDERED, that the proposed agreement and the provisions thereof, including the Appendix to this Order, are hereby adopted; it is further

ORDERED, that this Order shall be effective upon issuance by the Board, which may be accomplished by mailing, by first class mail, a copy of this Order to Respondent Robban A. Sica, M.D.'s, attorney, at the address set forth in this agreement or upon transmission via facsimile to Respondent Robban A. Sica, M.D., or Respondent Robban A. Sica, M.D.'s, attorney, whichever is earliest.

DATED: 1/15/02



William P. Dillon, M.D.

Chair

State Board for Professional
Medical Conduct

EXHIBIT A

STATE OF NEW YORK : DEPARTMENT OF HEALTH
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

IN THE MATTER

OF

ROBBAN A. SICA, M.D.

STATEMENT
OF
CHARGES

ROBBAN A. SICA, M.D., the Respondent, was authorized to practice medicine in New York State on or about May 9, 1995 by the issuance of license number 199255 by the New York State Education Department. Dr. Sica's current address, upon information and belief, is 37 Lakewood Road, Trumbull, CT 06611.

ROBBAN A. SICA, M.D., is subject to the jurisdiction of the State Board for Professional Medical Conduct, pursuant to the prehearing and hearing procedures of Title II-A of Article 2 of the New York Public Health Law.

The 32 professional service corporations ("PCs") set forth in Exhibit B have been and/or are authorized to practice medicine in New York State by the New York State Department of State.

The PCs are subject to the jurisdiction of the State Board for Professional Medical Conduct, and the prehearing and hearing procedures of Title II-A of Article 2 of the New York Public Health Law, pursuant to Section 1503(d) of the New York Business Corporation Law.

ALLEGATIONS

A. A professional service corporation may be organized by one or more individuals who are authorized by law to render the same professional service, pursuant to Section 1503(a) of the New York Business Corporation Law.

B. Between May 9, 1995 and July 1, 1999, Dr. Sica became the sole shareholder of each one of the PCs set forth in Exhibit B and each one of these PCs was organized to practice medicine in compliance with Section 1503(a) of the New York Business Corporation Law.

C. Dr. Sica was the physician who, in compliance with Sections 1503(a) and 1504(a) of the New York Business Corporation Law, was the shareholder, director and officer of each one of the PCs.

D. Upon organizing, establishing, or owning the PCs, Dr. Sica, upon advice of counsel, hired a management company to supervise, administer and oversee every aspect of the business operations of each of the PCs, including, but not limited to, procuring physical space, hiring and supervising non-professional employees, billing insurance companies, and handling all of the bookkeeping and accounting.

E. In many instances, Dr. Sica, per an agreement with each management company, received consideration, in the form of an annual fee, to be available to perform professional services on a consulting basis.

SPECIFICATION OF CHARGES

FIRST SPECIFICATION

The Respondent is charged with professional misconduct by reason of DIRECTLY OR INDIRECTLY RECEIVING OR AGREEING TO RECEIVE A FEE OR OTHER CONSIDERATION FROM A THIRD PARTY IN CONNECTION WITH THE PERFORMANCE OF PROFESSIONAL SERVICES, in violation of New York Education Law §6530(18), in that Petitioner charges:

1. The factual allegations in paragraphs A, B, C, D, and/or E.

DATED: *December 28*, 2001
Albany, New York


PETER D. VAN BUREN
Deputy Counsel
Bureau of Professional
Medical Conduct

EXHIBIT B

58th STREET MEDICAL, P.C.;
ACCESS MEDICAL SERVICES, P.C.;
ADVANCED MEDICAL OF ASTORIA, P.C.;
ADVANCED MEDICAL OF BUFFALO, P.C.;
ADVANCED MEDICAL OF KINGSTON, P.C.;
ALPHA COMPREHENSIVE MEDICAL HEALTH-
CARE, P.C.;
ASPEN MEDICAL AND DIAGNOSTICS, P.C.;
AVISTAR MEDICAL SERVICES, P.C.;
BELLMORE MEDICAL SERVICES, P.C.;
BRONX MEDICAL AND WELLNESS, P.C.
CENTRAL HEALTH MEDICAL OFFICE, P.C.;
CENTRAL MEDICAL PRACTICE, P.C.;
CITY WELLNESS MEDICAL, P.C.;
HUDSON VALLEY ALTERNATIVE MEDICINE, P.C.;
INTEGRATED COMPREHENSIVE MEDICAL
SERVICES, P.C.;
J.R. MEDICAL DIAGNOSTIC SERVICES, P.C.;
MAHOPAC DIAGNOSTIC PREVENTIVE AND FITNESS
MEDICAL PRACTICE, P.C.;
MAMARONECK MEDICAL SERVICES, P.C.;
MEDICAL ON 42nd STREET, P.C., d/b/a
SEVENTH AVENUE MEDICAL PRACTICE, P.C.;
MERRICK MEDICAL SERVICES, P.C.;
MID-CITY MEDICAL & WELLNESS, P.C.;
MIDDLE ISLAND MEDICAL SERVICES, P.C.;
NANUET MEDICAL SERVICES, P.C.;
NORTH SHORE MEDICAL, P.C.;
N.Y. MEDICAL & DIAGNOSTIC, P.C.;
PARK COMPREHENSIVE MEDICAL P.C.;
PLAINVIEW MEDICAL SERVICES, P.C.;
POST AVENUE MEDICAL OFFICE, P.C.;
PRIMARY MEDICAL HEALTH, P.C.;
ST. FRANCIS MEDICAL, P.C.;
UNIVERSAL MEDICAL EVALUATION, P.C.;
VENEZ MEDICAL SERVICES, P.C.

EXHIBIT C

Set forth below is a list of companies and persons.

For each company listed below, to the best of her knowledge, the Respondent shall provide information and recollection, as well as documentation other than those documents that have been provided previously, concerning:

- a) her business relationship with each company;
- b) her establishment of each company, the identity of owners, the identity of persons who were business associates of each company, the identity of the corporate officers, and the identity of the owners of each management company that serviced each company;
- c) the identities of those who interviewed staff, who recruited staff, who hired staff, who established job descriptions, who established employee roles, and who determined employee salaries, and the location at which such services were provided;
- d) the way in which the Respondent initially became aware of the potential for a business relationship between herself and the company, the identities of the attorneys and other persons involved in the development of the business relationship, the function of the company and services it provided, and the identities of all partners, providers, consultants and licensed and unlicensed staff of each company;
- e) the way in which each owner that succeeded her was found/recruited, and how the company was transferred from her to the new owner, at what price and at what time and with which attorney's advice;
- f) the degree of oversight of employees, contractors or other business associates, along with all written reports, notes, billing records, payments and other records or other correspondence;
- g) the names of banks or similar institutions, addresses, respective account numbers, date of inception and date of termination of each account, and identities of all authorized signatories for each account maintained by each company and/or each company's management company while she was an owner of the company, whether she was a nominal owner or an owner in fact;
- h) her schedule/appointment calendar from 1/1/97 to 12/31/00 insofar as it identifies events with employees, contractors, or other business associates;

For each person listed below, to the best of her knowledge, the Respondent shall provide information and recollection, as well as documentation other than those documents that have been provided previously, concerning:

a) all aspects of her business relationships with each person;

b) with respect to MD#1, her divorce proceeding determinations insofar as they relate to the distribution of business assets, including all records that were provided to the Court and final disposition decisions of the Court.

COMPANIES

The list is set forth in a separate confidential document.

PERSONS

The list is set forth in a separate confidential document.