



September 5, 2023

George Parisotto
Administrative Director
Division of Workers' Compensation
1515 Clay Street, Suite 1700
Oakland, CA 94612

Re: Karimi Chiropractic Corporation
Golden State Diagnostic, Inc.
Response to Notices of Provider Suspension
and Request for Hearing

Dear Mr. Parisotto:

After I responded to the Notice of Provider Suspension concerning Dr. Shahriar Karimi, my client received two more notices of suspension for: (1) Golden State Diagnostic, Inc. (GSDI) and (2) Karimi Chiropractic Corporation (KCC). I am responding these other notices of suspension.

First, the stated basis for the suspension of these two entities is they are controlled by Dr. Karimi. But as stated in Dr. Karimi's September 4, 2023, response to the notice of suspension and request for hearing, Dr. Karimi's judicially-dismissed misdemeanor conviction does not involve any qualifying conviction under Labor Code section 139.21, and is not a "conviction" under the statute. Thus, neither GSDI nor KCC is an entity subject to a Labor Code section 139.21, subdivision (a), suspension.

Dr. Karimi incorporates his September 4, 2023, response and request for hearing, which is attached, to this response.

Second, as for KCC, the Secretary of State documents you provided show that the corporation was dissolved over ten years ago, on February 17, 2012. Thus, this corporation no longer exists.

For the reasons stated above, and in Dr. Karimi's September 4, 2023, response and request for hearing, Dr. Karimi requests that the Division withdraw the August 29, 2023, Notices of Provider Suspension for GSDI and KCC. In the alternative, Dr. Karimi requests a hearing.

I will accept service of pleadings and correspondence by email:
mi@mikimlaw.com.

Thank you for your consideration.

Very truly yours,

/S/Mi Kim

Mi Kim

Enclosure