

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF WORKERS' COMPENSATION  
LEGAL UNIT  
1515 Clay Street, Suite 1700  
Oakland, California 94612  
Tel (510) 286 -7100 Fax (510) 286-0687



August 18, 2021

Pain Free Diagnostic  
c/o CT Corporation System  
1812 W. Burbank BLVD #9  
Burbank, CA 91506

### **NOTICE OF PROVIDER SUSPENSION – WORKERS' COMPENSATION**

Dear Pain Free Diagnostic:

The Administrative Director of the Division of Workers' Compensation (DWC) is required by Labor Code section 139.21(a)(1)(A) to suspend you from participation in the California workers' compensation system because you have been convicted of a crime described in Labor Code section 139.21(a)(1)(A). Enclosed are copies of the documents relied upon by the Administrative Director as the basis for taking this action.

Your suspension will start 30 calendar days after the date of mailing of this notice, unless you submit a written request for a hearing, which will stay the suspension pending the outcome of the hearing. Your request must be made within 10 calendar days of the date of mailing of this notice. If you do not request a hearing within the 10-day time limit, you will be suspended from participation in the California workers' compensation system pursuant to California Code of Regulations, title 8, section 9788.2(b).

Your request for a hearing must contain:

- Your current mailing address;
- The legal and factual reasons as to why you do not believe Labor Code section 139.21(a)(1) is applicable to you; and
- Your original signature or the original signature of your legal representative.

The scope of the hearing is limited to whether or not Labor Code section 139.21(a)(1) is applicable to you. The Administrative Director is required to suspend you unless you provide proof in the hearing that Labor Code section 139.21(a)(1) does not apply.

Your original request for a hearing and one copy of the request must be filed with the Administrative Director. Additionally, you must also serve one copy of the request for a hearing on the DWC Legal Unit. The addresses for the Administrative Director and the Legal Unit are:

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c/o CT Corporation System

Administrative Director  
Division of Workers' Compensation  
1515 Clay Street, Suite 1800  
Oakland, California 94612

and

Hearing Request  
Department of Industrial Relations  
Officer of the Director  
Anti-Fraud Unit  
1515 Clay Street, Suite 1700  
Oakland, CA 94612

The original and all copies of the request for hearing must have a proof of service attached. A sample proof of service, containing all necessary elements, can be found on the DWC website at <https://www.dir.ca.gov/dwc/forms.html>, under the category "Court Forms," and then "Proof of Service." The Administrative Director is required to hold your hearing within 30 days of the receipt of your written request. The hearing will be conducted by a hearing officer appointed by the Administrative Director. You will be notified shortly after the receipt of your request of the date and time of the hearing.

For more information about the suspension procedure, please refer to Provider Suspension Regulations, California Code of Regulations, title 8, sections 9788.1 - 9788.4, which can be found on the DWC website at <http://www.dir.ca.gov/dwc/DWCPropRegs/Provider-Suspension-Procedure/Clean-Version/Text-of-Regulations.pdf>.

Sincerely,

/S/ George Parisotto

George Parisotto  
Administrative Director  
Division of Workers' Compensation

Encls:

- Superseding Information in the *United States of America v. Bahar Gharib-Danesh. D.C. and Pain Free Diagnostic, INC.*, (Case #:1:15-CR-00179-LJO), United States District Court, Eastern District of California
- Plea Agreement for Pain Free Diagnostic, Inc., a California Corporation, dba Pain Free Management, in *United States of America v Pain Free Diagnostic, et al.*, (Case #: 1:15-cr-00179-LJO), United States District Court, Eastern District of California, with accompanying Joint Motion for the Deposit of Funds into the Court's Registry; and Order Thereon in *United States of America v Bahar Garib-Danesh, et.al.*, (Case #: 1:15-

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cr-00179-LJO-SKO), United States District Court, Eastern District of California, Minutes Combined Meeting Shareholders And Board of Directors Pain Free Diagnostic, dated June 28, 2018, and Waiver of Notice for Combined Meeting Shareholders and Board of Directors Minutes for Pain free Diagnostic dated: June 27, 2018, and Combined Meeting Shareholders and Board of Directors Minutes for Pain Free Diagnostic dated: June 28, 2018.

- Criminal Docket for Case #:1:15-cr-00179-LJO-SKO-4 in *United States of America v. Gharib-Danesh et al.*, United States District Court, Eastern District of California
- Business Search-Entity Detail for Pain Free Diagnostic, California Secretary of State, dated: August 5, 2019
- Declaration of Willa Morton in Support of Notice of Provider Suspension
- Proof of Service