

**INDEX**

**Laura Anderson, M.D. Neurosurgeon**

<b>Exhibit #</b>	<b>Document</b>	<b>File Date</b>
1	The People of the State of California v. Laura Anderson	
2	Felony Arrest Warrant Laura Jean Anderson	4/5/2019
3	Npi 1841350998 Laura Anderson M.D.	
4	Accurint Comprehensive Business Report Laura Anderson M.D., Neurosurgeon	

# EXHIBIT 1

1  
2 ANNE MARIE SCHUBERT  
3 DISTRICT ATTORNEY  
4 901 G STREET  
5 SACRAMENTO, CA 95814  
6 (916) 874-6218

DA-19-058  
M. McCOY, DDA  
TEAM: (IF)  
XRef: 1242210

7  
8  
9 **SUPERIOR COURT OF CALIFORNIA**  
10 **COUNTY OF SACRAMENTO**

11  
12 THE PEOPLE OF THE STATE OF CALIFORNIA, FELONY COMPLAINT  
13  
14 vs.  
15  
16 LAURA JEAN ANDERSON,  
17  
18 Defendant.  
19

20  
21 The People of the State of California upon oath of the undersigned, upon information and belief  
22 complain against the defendant above named for the crime(s) as follows:

23  
24 **COUNT ONE**

25 On or about and between January 1, 2013, and June 4, 2018, at and in the County of Sacramento,  
26 State of California, the defendant, LAURA JEAN ANDERSON, did commit a felony, namely: a  
27 violation of Section 550(a)(6) of the Penal Code of the State of California, in that said defendant  
28 did aid, abet, solicit, conspire with another and did knowingly make and cause to be made false  
29 and fraudulent claims to the State Compensation Insurance Fund (SCIF) for payment of a health  
30 care benefit, in an amount exceeding nine hundred fifty dollars (\$950). TO WIT: Claims related  
31 to CPT billing code 99215 (Evaluation of Established Patient, High Complexity).  
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4 **COUNT TWO**

5 For a further and separate cause of action, being a different offense from but connected in its  
6 commission as the charges set forth in Count One hereof: On or about and between January 1,  
7 2013, and June 4, 2018, at and in the County of Sacramento, State of California, the defendant,  
8 LAURA JEAN ANDERSON, did commit a felony, namely: a violation of Section 550(a)(6) of  
9 the Penal Code of the State of California, in that said defendant did aid, abet, solicit, conspire  
10 with another and did knowingly make and cause to be made false and fraudulent claims to the  
11 State Compensation Insurance Fund (SCIF) for payment of a health care benefit, in an amount  
12 exceeding nine hundred fifty dollars (\$950). TO WIT: Claims related to CPT billing codes  
13 99371, 99441, 99442, and 99443 (Telephone Evaluation and Management).  
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16 **COUNT THREE**

17 For a further and separate cause of action, being a different offense from but connected in its  
18 commission as the charges set forth in Counts One and Two hereof: On or about and between  
19 January 1, 2013, and June 4, 2018, at and in the County of Sacramento, State of California, the  
20 defendant, LAURA JEAN ANDERSON, did commit a felony, namely: a violation of Section  
21 550(a)(6) of the Penal Code of the State of California, in that said defendant did aid, abet, solicit,  
22 conspire with another and did knowingly make and cause to be made false and fraudulent claims  
23 to the State Compensation Insurance Fund (SCIF) for payment of a health care benefit, in an  
24 amount exceeding nine hundred fifty dollars (\$950). TO WIT: Claims related to CPT billing  
25 code 72100 (X-ray - Lumbar Spine).  
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4 **COUNT FOUR**

5 For a further and separate cause of action, being a different offense from but connected in its  
6 commission as the charges set forth in Counts One through Three hereof: On or about and  
7 between January 1, 2013, and June 4, 2018, at and in the County of Sacramento, State of  
8 California, the defendant, LAURA JEAN ANDERSON, did commit a felony, namely: a  
9 violation of Section 550(a)(6) of the Penal Code of the State of California, in that said defendant  
10 did aid, abet, solicit, conspire with another and did knowingly make and cause to be made false  
11 and fraudulent claims to the State Compensation Insurance Fund (SCIF) for payment of a health  
12 care benefit, in an amount exceeding nine hundred fifty dollars (\$950). TO WIT: Claims related  
13 to CPT billing codes 99401, 99402, and 99403 (Preventative Medicine / Risk Factor  
14 Counseling).  
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18 **COUNT FIVE**

19 For a further and separate cause of action, being a different offense from but connected in its  
20 commission as the charges set forth in Counts One through Four hereof: On or about and  
21 between January 1, 2013, and June 4, 2018, at and in the County of Sacramento, State of  
22 California, the defendant, LAURA JEAN ANDERSON, did commit a felony, namely: a  
23 violation of Section 550(a)(6) of the Penal Code of the State of California, in that said defendant  
24 did aid, abet, solicit, conspire with another and did knowingly make and cause to be made false  
25 and fraudulent claims to the State Compensation Insurance Fund (SCIF) for payment of a health  
26 care benefit, in an amount exceeding nine hundred fifty dollars (\$950). TO WIT: Claims related  
27 to CPT billing code 99408 (Alcohol and/or Substance Abuse Screening).  
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4 **COUNT SIX**

5 For a further and separate cause of action, being a different offense from but connected in its  
6 commission as the charges set forth in Counts One through Five hereof: On or about and  
7 between January 1, 2013, and June 4, 2018, at and in the County of Sacramento, State of  
8 California, the defendant, LAURA JEAN ANDERSON, did commit a felony, namely: a  
9 violation of Section 1871.4(a)(1) of the Insurance Code of the State of California, in that said  
10 defendant did unlawfully and knowingly make and cause to be made a false and fraudulent  
11 material statement and material representation for the purpose of obtaining and denying  
12 compensation, as defined in Section 3207 of the Labor Code, and did aid and abet, solicit, and  
13 conspire with another to do the same. TO WIT: An oral or written statement and bill for services  
14 related to CPT billing code 99215 (Evaluation of Established Patient, High Complexity).  
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18 **COUNT SEVEN**

19 For a further and separate cause of action, being a different offense from but connected in its  
20 commission as the charges set forth in Counts One through Five hereof: On or about and  
21 between January 1, 2013, and June 4, 2018, at and in the County of Sacramento, State of  
22 California, the defendant, LAURA JEAN ANDERSON, did commit a felony, namely: a  
23 violation of Section 1871.4(a)(1) of the Insurance Code of the State of California, in that said  
24 defendant did unlawfully and knowingly make and cause to be made a false and fraudulent  
25 material statement and material representation for the purpose of obtaining and denying  
26 compensation, as defined in Section 3207 of the Labor Code, and did aid and abet, solicit, and  
27 conspire with another to do the same. TO WIT: An oral or written statement and bill for services  
28 related to CPT billing codes 99371, 99441, 99442, and 99443 (Telephone Evaluation and  
29 Management).  
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4 **COUNT EIGHT**

5 For a further and separate cause of action, being a different offense from but connected in its  
6 commission as the charges set forth in Counts One through Five and Count Seven hereof: On or  
7 about and between January 1, 2013, and June 4, 2018, at and in the County of Sacramento, State  
8 of California, the defendant, LAURA JEAN ANDERSON, did commit a felony, namely: a  
9 violation of Section 1871.4(a)(1) of the Insurance Code of the State of California, in that said  
10 defendant did unlawfully and knowingly make and cause to be made a false and fraudulent  
11 material statement and material representation for the purpose of obtaining and denying  
12 compensation, as defined in Section 3207 of the Labor Code, and did aid and abet, solicit, and  
13 conspire with another to do the same. TO WIT: An oral or written statement and bill for services  
14 related to CPT billing code 72100 (X-ray - Lumbar Spine).  
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17 **COUNT NINE**

18 For a further and separate cause of action, being a different offense from but connected in its  
19 commission as the charges set forth in Counts One through Five and Counts Seven and Eight  
20 hereof: On or about and between January 1, 2013, and June 4, 2018, at and in the County of  
21 Sacramento, State of California, the defendant, LAURA JEAN ANDERSON, did commit a  
22 felony, namely: a violation of Section 1871.4(a)(1) of the Insurance Code of the State of  
23 California, in that said defendant did unlawfully and knowingly make and cause to be made a  
24 false and fraudulent material statement and material representation for the purpose of obtaining  
25 and denying compensation, as defined in Section 3207 of the Labor Code, and did aid and abet,  
26 solicit, and conspire with another to do the same. TO WIT: An oral or written statement and bill  
27 for services related to CPT billing codes 99401, 99402, and 99403 (Preventative Medicine / Risk  
28 Factor Counseling).  
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4 **COUNT TEN**

5 For a further and separate cause of action, being a different offense from but connected in its  
6 commission as the charges set forth in Counts One through Five and Counts Seven through Nine  
7 hereof: On or about and between January 1, 2013, and June 4, 2018, at and in the County of  
8 Sacramento, State of California, the defendant, LAURA JEAN ANDERSON, did commit a  
9 felony, namely: a violation of Section 1871.4(a)(1) of the Insurance Code of the State of  
10 California, in that said defendant did unlawfully and knowingly make and cause to be made a  
11 false and fraudulent material statement and material representation for the purpose of obtaining  
12 and denying compensation, as defined in Section 3207 of the Labor Code, and did aid and abet,  
13 solicit, and conspire with another to do the same. TO WIT: An oral or written statement and bill  
14 for services related to CPT billing code 99408 (Alcohol and/or Substance Abuse Screening).  
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18 **COUNT ELEVEN**

19 For a further and separate cause of action, being a different offense from but connected in its  
20 commission as the charges set forth in Counts One through Five and Counts Seven through Ten  
21 hereof: On or about and between January 1, 2013, and June 4, 2018, at and in the County of  
22 Sacramento, State of California, the defendant, LAURA JEAN ANDERSON, did commit a  
23 felony, namely: a violation of Section 532(a) of the Penal Code of the State of California, in that  
24 said defendant did unlawfully, knowingly, designedly and fraudulently get possession of money  
25 and property, and obtain labor and service of another in violation of this section, to wit: State  
26 Compensation Insurance Fund, in violation of this section.  
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4 That attached hereto and by this reference incorporated herein is a declaration setting forth facts  
5 in support of probable cause for the issuance of a warrant of arrest herein.  
6

7 I declare upon information and belief and under penalty of perjury that the foregoing is true and  
8 correct.  
9

10 Executed at Sacramento County, California, the 3<sup>rd</sup> day of April, 2019.  
11

12  
13  
14 \_\_\_\_\_  
15 MICHAEL D. McCOY  
16 SACRAMENTO COUNTY DEPUTY  
17 DISTRICT ATTORNEY  
18 (916) 874-6218  
19 Telephone Number  
20

KL

21 **HOLDING ORDER**

22  
23 \_\_\_\_\_ It appearing to me that the offense(s) in the within complaint has/have been committed,  
24 and that there is sufficient cause to believe that the defendant, LAURA JEAN  
25 ANDERSON, is guilty thereof,

26 \_\_\_\_\_ The defendant, LAURA JEAN ANDERSON, having waived preliminary hearing to the  
27 offense(s) set forth in this complaint,  
28

29 Exceptions/Additions/Conditions: \_\_\_\_\_  
30 \_\_\_\_\_  
31 \_\_\_\_\_  
32

33 I order that the defendant be held to answer to same. In my capacity as Judge of the Superior  
34 Court, I deem the within complaint to be an Information and order it filed in the Superior Court.  
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36 Date: \_\_\_\_\_ Dept: \_\_\_\_\_  
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38 Judge of the Superior Court Sitting as Magistrate  
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3 DECLARATION IN SUPPORT OF ARREST WARRANT  
4 (Made under 2015.5 CCP)  
5

6 The undersigned hereby declares:

7 That your declarant is currently employed as a Deputy District Attorney for the County of  
8 Sacramento, State of California.

9 That pursuant to said employment, your declarant has been assigned to investigate  
10 allegations that the defendant, LAURA JEAN ANDERSON, did commit the crimes as set forth  
11 in the attached complaint.

12 That pursuant to said assignment, your declarant has contacted person(s) having  
13 knowledge of said offenses and who has/have prepared written reports and/or statements, and/or  
14 has received and read written reports and/or statements prepared by others known by your  
15 declarant to be law enforcement officers, all of which reports and/or statements are included in a  
16 report consisting of 34 pages, which is attached hereto as Exhibit I and incorporated by  
17 references as though fully set forth.

18 That each of these documents is presently an official record of a law enforcement agency.

19 WHEREFORE, your declarant prays that a warrant issue for the arrest of the  
20 hereinabove-named defendant and that said defendant be dealt with according to law.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on the 3<sup>rd</sup> day of April, 2019, Sacramento, California.  
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28 MICHAEL D. McCOY

29 Declarant

30 901 G Street,

31 Sacramento, California 95814

32 Sacramento County District Attorney  
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# EXHIBIT 2



# EXHIBIT 3

**1841350998**  
**LAURA ANDERSON**  
**National Provider Identifiers Registry**

The Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) mandated the adoption of standard unique identifiers for health care providers and health plans. The purpose of these provisions is to improve the efficiency and effectiveness of the electronic transmission of health information. The Centers for Medicare & Medicaid Services (CMS) has developed the National Plan and Provider Enumeration System (NPPES) to assign these unique identifiers.

**1841350998 LAURA ANDERSON**

<i>NPI</i>	1841350998	10-position all-numeric identification number assigned by the NPS to uniquely identify a health care provider.
<i>Entity Type</i>	Individual	Code describing the type of health care provider that is being assigned an NPI. Codes are: <ul> <li>1 = (Person): individual human being who furnishes health care;</li> <li>2 = (Non-person): entity other than an individual human being that furnishes health care (for example, hospital, SNF, hospital subunit, pharmacy, or HMO).</li> </ul>
<i>Is Sole Proprietor</i>	Y	Indicate whether provider is a sole proprietor. <ul> <li>A sole proprietor is the sole (the only) owner of a business that is not incorporated; that unincorporated business is a sole proprietorship.</li> <li>In a sole proprietorship, the sole proprietor owns all of the assets of the business and is solely liable for all of the debts of the business.</li> <li>There is no difference between a sole proprietorship and a sole proprietor; they are legally a single entity: an individual.</li> <li>In terms of NPI assignment, a sole proprietor is an Entity type 1 (Individual) and is eligible for only one NPI (the sole proprietorship business is not eligible for its own NPI).</li> <li>As an individual, a sole proprietorship cannot be a subpart and cannot have subparts. (See NPI Final Rule for information about subparts.)</li> <li>A sole proprietorship may or may not have employees.</li> <li>Often, the IRS assigns an EIN to a sole proprietorship in order to protect the sole proprietor's SSN from disclosure in claims or on W-2s. NPPES does not capture a sole proprietorship's EIN.</li> <li>Many types of health care providers could be sole proprietorships (for example, group practices, pharmacies, home health agencies).</li> </ul>
<i>Provider Last Name (Legal Name)</i>	ANDERSON	The last name of the provider (if an individual). If the provider is an individual, this is the legal name. This name must match the name on file with the Social Security Administration (SSA). In addition, the date of birth must match that on file with SSA. (First and last names are required for initial applications.) The First, Middle, Last and Credential(s) fields allow the following special characters: ampersand, apostrophe, colon, comma, forward slash, hyphen, left and right parentheses, period, pound sign, quotation mark, and semi-colon. A field cannot contain all special characters.
<i>Provider First Name</i>	LAURA	The first name of the provider, if the provider is an individual.

<i>Provider Credential Text</i>	MD	The abbreviations for professional degrees or credentials used or held by the provider, if the provider is an individual. Examples are MD, DDS, CSW, CNA, AA, NP, RNA, or PSY. These credential designations will not be verified by NPS.
<i>Provider First Line Business Mailing Address</i>	PO BOX 34120	The first line mailing address of the provider being identified. This data element may contain the same information as "Provider first line location address".
<i>Provider Business Mailing Address City Name</i>	RENO	The City name in the mailing address of the provider being identified. This data element may contain the same information as "Provider location address City name".
<i>Provider Business Mailing Address State Name</i>	NV	The State or Province name in the mailing address of the provider being identified. This data element may contain the same information as "Provider location address State name".
<i>Provider Business Mailing Address Postal Code</i>	89533-4120	The postal ZIP or zone code in the mailing address of the provider being identified. NOTE: ZIP code plus 4-digit extension, if available. This data element may contain the same information as "Provider location address postal code".
<i>Provider Business Mailing Address Country Code</i>	US	The country code in the mailing address of the provider being identified. This data element may contain the same information as "Provider location address country code".
<i>Provider Business Mailing Address Telephone Number</i>	775-747-5050	The telephone number associated with mailing address of the provider being identified. This data element may contain the same information as "Provider location address telephone number".
<i>Provider Business Mailing Address Fax Number</i>	775-747-5005	The fax number associated with the mailing address of the provider being identified. This data element may contain the same information as "Provider location address fax number".
<i>Provider First Line Business Practice Location Address</i>	3415 AMERICAN RIVER DR	The first line location address of the provider being identified. For providers with more than one physical location, this is the primary location. This address cannot include a Post Office box.
<i>Provider Second Line Business Practice Location Address</i>	STE A	The second line location address of the provider being identified. For providers with more than one physical location, this is the primary location. This address cannot include a Post Office box.
<i>Provider Business Practice Location Address City Name</i>	SACRAMENTO	The city name in the location address of the provider being identified.
<i>Provider Business Practice Location Address State Name</i>	CA	The State or Province name in the location address of the provider being identified.
<i>Provider Business Practice Location Address Postal Code</i>	95864-5794	The postal ZIP or zone code in the location address of the provider being identified. NOTE: ZIP code plus 4-digit extension, if available.

<i>Provider Business Practice Location Address Country Code</i>	US	The country code in the location address of the provider being identified.
<i>Provider Business Practice Location Address Telephone Number</i>	916-648-0144	The telephone number associated with the location address of the provider being identified.
<i>Provider Business Practice Location Address Fax Number</i>	916-561-0867	The fax number associated with the location address of the provider being identified.
<i>Provider Enumeration Date</i>	12/11/2006	The date the provider was assigned a unique identifier (assigned an NPI).
<i>Last Update Date</i>	07/19/2012	The date that a record was last updated or changed.
<i>Provider Gender Code</i>	F	The code designating the provider's gender if the provider is a person.
<i>Provider Gender</i>	Female	The provider's gender if the provider is a person.
<i>Healthcare Provider Taxonomy Code #1</i>	208600000X	The Health Care Provider Taxonomy code is a unique alphanumeric code, ten characters in length. The code set is structured into three distinct "Levels" including Provider Type, Classification, and Area of Specialization.
<i>Healthcare Provider Taxonomy 1</i>	Surgery	Healthcare Provider Taxonomy #1
<i>Provider License Number 1</i>	G51523	Certain taxonomy selections will require you to enter your license number and the state where the license was issued. Select Foreign Country in the state drop down box if the license was issued outside of United States. The License Number field allows the following special characters: ampersand, apostrophe, colon, comma, forward slash, hyphen, left and right parentheses, period, pound sign, quotation mark, and semi-colon. A field cannot contain all special characters. DO NOT report the Social Security Number (SSN), IRS Individual Taxpayer Identification Number (ITIN) in this section.
<i>Provider License Number State Code 1</i>	CA	Provider License Number State Code #1
<i>Healthcare Provider Primary Taxonomy Switch 1</i>	Y	Primary Taxonomy: <ul> <li>X - The primary taxonomy switch is Not Answered;</li> <li>Y - The taxonomy is the primary taxonomy (there can be only one per NPI record);</li> <li>N - The taxonomy is not the primary taxonomy.</li> </ul>

NPPES National Plan & Enumeration System  
1-800-465-3203 (NPI Toll-Free)  
1-800-692-2326 (NPI TTY)  
NPI Enumerator  
PO Box 6059  
Fargo, ND 58108-6059  
Email: [customerservice@npienumerator.com](mailto:customerservice@npienumerator.com)

For all questions regarding this bundle please contact [Support@HIPAASpace.com](mailto:Support@HIPAASpace.com). Also feel free to let us know about any suggestions or concerns. All additional information as well as customer support is available at <http://www.hipaaspace.com>.

# EXHIBIT 4

**Important:** The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

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**Your DPPA Permissible Use:** Court, Law Enforcement, or Government Agencies

**Your GLBA Permissible Use:** Law Enforcement Purposes

**Your DMF Permissible Use:** No Permissible Purpose

## Comprehensive Business Report

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**Date:** 04/10/19

**Reference Code:** AFU-LAURA ANDERSON

Company Name: **LAURA ANDERSON MD, NEUROSURGEON**

Address: **1007 39TH ST, SACRAMENTO, CA 95816-5502, SACRAMENTO COUNTY**

Phone: **916-731-5482** 📞 Phone De-Listed in Electronic Directory Assistance

### **Name Variations:** 📄

Company Name: **LAURA ANDERSON MD, NEUROSURGEON**

### **TIN Variations:** 📄

[None Found]

### **Parent Company:** 📄

[None Found]

### **Industry Information:** 📄

SIC Code: **8011**

SIC Description: **Offices & Clinics Of Medical Doctors**

### **Bankruptcies:** 📄

[None Found]

### **Liens & Judgments:** 📄

[None Found]

### **Corporation Filings:** 📄

[None Found]

**Registered Agents:** 

[None Found]

**Business Registration:** 

[None Found]

**UCC Filings for Business:** 

[None Found]

**Associated Businesses:** 

[None Found]

**Connected Businesses:** Name: [LAURA ANDERSON MD NEUROSURGEON](#)Address: [83 SCRIPPS DR, SACRAMENTO, CA 95825-6319](#)**Business Contacts:** **Current Individuals:**

[None Found]

**Prior Individuals:**Name: [LAURA ANDERSON](#)SSN: [562-04-xxxx](#)Address: [1007 39TH ST, SACRAMENTO, CA 95816-5502](#)**Executives:** **Current Executives:**

[None Found]

**Prior Executives:**

[None Found]

**Properties:** 

[None Found]

**FAA Aircrafts:** **Current Aircraft(s):**

[None Found]

**Prior Aircraft(s):**

[None Found]

**Watercrafts:** **Current Watercrafts:**

[None Found]

**Prior Watercrafts:**

[None Found]