

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



April 26, 2023

Firstline Health, Inc. dba US Health & Orthopedic, Inc.  
228 Park Ave., S Ste. #44407  
New York, NY 10003

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

Dear Firstline Health, Inc.:

The Administrative Director of the Division of Workers' Compensation (DWC) is required by Labor Code section 139.21(a)(1)(D) to suspend you from participation in the California workers' compensation system because you are controlled by an individual(s) [Rosa Bernal, Hector Sandoval, and Paul Turley] who has/have been convicted of a felony or misdemeanor described in subparagraph (A) of Labor Code section 139.21. Per Labor Code section 139.21(a)(3), an entity is controlled by an individual if: (1) the individual is or was an officer or director of the entity; (2) is or was a shareholder with a 10 percent or greater interest in the entity; or (3) held de facto ownership of the entity or de facto control consistent with the rights and duties of an officer or director of the entity (see *Villanueva v. Teva Foods* (2019) WCAB Case No. ADJ9332041, 84 Cal. Comp. Cases 198 [significant panel decision]). 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;
- Your original signature or the original signature of your legal representative; and
- A valid email address for subsequent service of pleadings and/or correspondence.

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.

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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 DIR Anti-Fraud Unit. This may be completed either by regular mail or via email to: [AntiFraudUnit@dir.ca.gov](mailto:AntiFraudUnit@dir.ca.gov).

The mailing address for the Administrative Director is:

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

And/or if needed:

Hearing Request  
Department of Industrial Relations  
Office of the Director – Anti-Fraud Unit  
1515 Clay Street, Suite 701  
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/DWCPropRegs/Provider-Suspension-Procedure/Provider-Suspension-Procedure.htm>, 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 <https://www.dir.ca.gov/dwc/DWCPropRegs/Provider-Suspension-Procedure/Clean-Version/Text-of-Regulations.doc>.

Sincerely,

/S/ George Parisotto  
George Parisotto  
Administrative Director  
Division of Workers' Compensation

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Encls:

- Indictment: *The People of the State of California v. Munir Uwaydah, et al*, Superior Court of the State of California, County of Los Angeles, Case No. BA425397, dated 2/25/2015
- Supplemental Plea Form: *The People of the State of California v. Rosa Bernal, et al*, Superior Court of California, County of Riverside, Case No. RIF1990023. Filed 9/3/2019
- US Health and Orthopedic Inc. Secretary of State Certificate of Surrender. Filed 2/6/2019
- Firstline Health Inc. CA Secretary of State Certificate of Amendment of Articles of Incorporation. Filed 5/10/2018
- Plea of Guilty/No Contest – Felony: *People vs. Paul Turley*, Superior Court of California, County of San Diego, dated 3/1/2021
- Change of Plea Form Addendum: Paul Turley – Defendant, Superior Court of California, County of San Diego, Case No. SCD276470, dated 3/1/2021
- Factual Statement of Paul Turley (BA455469-BA455470-BA455473). Filed 2/8/2018
- Firstline Health Inc. CA Medical Board Fictitious Name Permit and Application - FNP 40471
- Firstline Health, Inc. CA Secretary of State Statement of Information. Filed 1/16/2017
- Sentencing Memorandum: *People v. Hector Sandoval*, Superior Court of California, County of Riverside, Case No. RFI1990023. Filed 9/27/2019
- Felony Plea Form: *People v. Hector Sandoval*, Superior Court of California, County of Riverside, Case No. RFI1990023. Filed 9/27/2019
- US Health and Orthopedic Inc. CA Secretary of State Statement of Information. Filed 6/26/2018
- Firstline Health, Inc. CA Secretary of State Corporation - Statement of Information No Change. Filed 10/6/2021
- Firstline Health, Inc. CA Secretary of State Articles of Incorporation. Filed 2/23/2010
- Firstline Health, Inc. CA Secretary of State Statement of Information. Filed 10/19/2018
- US Health and Orthopedic Inc. CA Secretary of State Statement and Designation by Foreign Corporation. Filed 5/15/2018
- US Health and Orthopedic Inc. DE Secretary of State Certificate of Incorporation, dated 5/15/2018
- Agreement: *People of the State of California v. Paul Turley*, Superior Court of State of California, County of Los Angeles, Case No. BA455469. Filed 12/3/2018
- Indictment: *The People of the State of California v. Kenneth Amodeo, et al*, Superior Court of California, County of Riverside, Case No. RIF1990023. Filed 1/17/2019
- Firstline Health, Inc. CA Secretary of State Business Search print out
- US Health and Orthopedic Inc. CA Secretary of State Business Search print out
- Firstline Health, Inc. NPI search print out

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- Declaration of Paul Turley, D.C.: *Jose Melgar v. Sea View Maintenance and Landscape*, Workers' Compensation Appeals Board, State of California, Case No. ADJ9540063, dated 3/31/2019
- Order of Suspension: In Re: Provider Suspension – Hector Sandoval, State of CA, Division of Workers' Compensation, dated 9/21/2022
- Order of Suspension: In Re: Provider Suspension – Rosa Bernal, State of CA, Division of Workers' Compensation, dated 6/29/2022
- Order of Suspension: In Re: Provider Suspension – Paul Turley, State of CA, Division of Workers' Compensation, dated 2/25/2019
- Declaration of John Gordon in Support of Notice of Provider Suspension
- Proof of Service (Certificate of Service by Mailing)