

STATE OF FLORIDA
OFFICE OF THE ATTORNEY GENERAL



PAM BONDI
ATTORNEY GENERAL

Medicaid Fraud Control Unit
Investigative Subpoena
Duces Tecum

To: [REDACTED] LLC.
[REDACTED]
[REDACTED], Florida 32[REDACTED]

You are hereby directed to appear at: Office of The Attorney General
Medicaid Fraud Control Unit
135 West Central Blvd. Suite 1000
Orlando, Florida 32801

on the November 30, 2014, at 10:00 a.m. and to have with you at that time and place the following:

See Attachment "A"

You may comply with this subpoena by providing legible copies of the items to be produced to the Medicaid Fraud Control Unit on or before the scheduled date of production. You may mail or deliver the copies and, with the consent of the Office of the Attorney General, eliminate your need to appear personally at the time and place specified. In lieu of a personal appearance please contact Law Enforcement Investigator Touckay McCurdy at 407-245-0799.

This Investigative Subpoena is issued pursuant to Section 409.920(10)(b), Florida Statutes.

This subpoena is issued as part of an ongoing criminal investigation. It is requested that you not disclose the existence of this subpoena or the State's investigation to anyone.

WITNESS, The Office of the Attorney General, Medicaid Fraud Control Unit, at Orlando, Florida, on this [REDACTED], 2014.

[REDACTED]
Assistant Attorney General

Personally served this [REDACTED] day of [REDACTED], 2014, upon

[REDACTED]
by [REDACTED]

Attachment A

RE: [REDACTED] LLC.

504 Garden Street

Titusville, FL 32796

TO: CUSTODIAN OF RECORDS

1. A list of pharmacy vendors including their contact information from whom you purchased prescription drugs during [REDACTED]/2012 - [REDACTED]/2014.
2. All invoices/credit memos and proofs of payments for prescription drug purchases during the service period of [REDACTED]/2012 - [REDACTED]/2014.
3. Drug dispensing report by drug NDC in an Excel file which indicates for the time period [REDACTED]/2012 - [REDACTED]/2014 the total number of units dispensed by you across all lines of business (Medicaid recipients, cash customers, third party payers...) including credit returns.
4. Drug dispensing reports by drug NDC in an Excel file which state for time periods [REDACTED]/2012 - [REDACTED]/2012, [REDACTED]/2013 - [REDACTED]/2013 and [REDACTED]/2014 - [REDACTED]/2014 the total number of units/packages on hand, the total number of units/packages sold and package size.
5. Drug inventory reports by drug NDC in an Excel file with beginning balance on [REDACTED]/2012 and ending balance on [REDACTED]/2014.
6. Drug prescriptions for the services to Medicaid recipients during the period [REDACTED]/2012 - [REDACTED]/2014.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY (DIGITALLY) STORED RECORDS

I. General

- A. Electronically stored records shall be produced in electronic form and shall include those records held:
1. In your record retention systems; and/or
 2. By your technology, data, or other service provider(s).

II. Text Data

- A. Text data relating to transactions (e.g., core data, history file) shall be produced within a data file:
1. Using delimited ASCII text data format; or
 2. Within software that can export without loss of data to a non proprietary file format; or
 3. Using commonly readable file format set by agreement.
- B. Text data files relating to transactions produced according to II.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

- A. Image data shall be produced in graphic data files in a non proprietary or commonly readable format with the highest image quality maintained.
- B. Image data of items associated with specific transactions (e.g., checks, deposits) shall be:
1. Produced in individual graphic data files with any associated endorsements; and
 2. Linked to corresponding text data by a unique identifier.