

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STATE OF NEW JERSEY
COMMISSION OF INVESTIGATION

----- x
IN THE MATTER OF:
THE ADDICTION REHABILITATION INDUSTRY
54-3
----- x

PUBLIC HEARING

AT: STATE HOUSE ANNEX
131-137 West State Street
Trenton, New Jersey
DATE: DECEMBER 21, 2022
TIME: 10:00 A.M.

B E F O R E: TIFFANY WILLIAMS BREWER, Chair
CHADD W. LACKEY, Executive Director
KEVIN R. REINA, Commissioner

A P P E A R A N C E S:
MARIAN GALIETTA, ESQ.
LISA CIALINO, ESQ.
Counsel to the Commission
GILBERT L. BROOKS, ESQ.
MATTHEW M. CAMINITI, ESQ.
Counsel for the Witness

RENZI LEGAL RESOURCES
BY: DONNA BRUNCK, CCR
CERTIFIED COURT REPORTER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS

PAGE

NICHOLAS DeSIMONE

DIRECT EXAMINATION BY MS. CIALINO

11

E X H I B I T S

EXHIBIT	DESCRIPTION	ID	EVID
AR-85	Powerpoint slides "Addiction Rehabilitation Industry in New Jersey".....		184
AR-88	UB Solutions document.....	161	184

(EXHIBITS NOT ANNEXED HERETO)

1 CHAIRWOMAN BREWER: We are ready to
2 proceed. Wonderful. Good morning. I'm Tiffany
3 Williams Brewer. I'm the chair of the State
4 Commission of Investigation and we are reconvened
5 today for SCI's public hearing into the addiction
6 rehabilitation industry in New Jersey.

7 This proceeding is a continuation of
8 the hearing held here on October 11th that exposed
9 significant abuses in the operation of drug and
10 alcohol treatment centers and rehabs across the
11 state.

12 I'd like to introduce other members
13 of the Commission. Sitting to my right is
14 Commissioner Kevin Reina. Commissioner Burzichelli
15 had planned to join us today but had a death in his
16 family. On behalf of the Commission, we send
17 condolences to Commissioner Burzichelli and his
18 loved ones. Our fourth commissioner, John Lacey,
19 out of an abundance of caution and to avoid any
20 appearance of impropriety or conflict of interest,
21 recused himself from this inquiry and is not present
22 today. Also joining us is Executive Director Chadd
23 Lackey, Chief Counsel Marian Galietta, and Counsel
24 Lisa Cialino, who led the investigative team in this
25 case.

1 Only a few weeks ago the SCI first
2 exposed how broken the addiction recovery industry
3 is in our state and how rampant it is with
4 corruption, fraud and unethical practices. We found
5 the type of care patients received or even which
6 treatments centers to admit them is often based more
7 on the quality of their private insurance coverage
8 and how much it will pay out instead of the services
9 they need to overcome drug or alcohol dependence.
10 Making things worse, much of this inappropriate and
11 elicited conduct occurs with impunity because various
12 areas of the addiction rehabilitation industry
13 remain largely unregulated, making it easy to
14 exploit patients.

15 We are reconvening here today to take
16 testimony from a witness, Nicholas DeSimone, the
17 owner of an outpatient addiction center, Kingsway
18 Recovery Center, in Mullica Hill. During our
19 October 11th hearing, SCI investigators, through
20 sworn testimony and multiple exhibits, detailed
21 findings of what appeared to be questionable billing
22 practices at the facility. The Commission found
23 some of these proceeds obtained from insurance
24 companies helped further Mr. DeSimone's treatment
25 center's operations and fund a lavish lifestyle.

1 This SCI subpoenaed Mr. DeSimone to
2 testify and answer questions about our findings at
3 our earlier public hearing but he failed to appear.
4 His action prompted the Commission to file a motion
5 of contempt with the court to compel his testimony
6 before this panel, and Mr. DeSimone is here today
7 pursuant to the Commission's lawfully issued
8 subpoena.

9 Today's proceeding is important
10 because it allows Mr. DeSimone to have the
11 opportunity to respond to questions from SCI counsel
12 about the Commission's findings concerning financial
13 practices and patient care at his treatment center.
14 Mr. DeSimone's appearance today also underscores the
15 Commission's statutory authority to compel witness
16 attendance in conducting fact finding
17 investigations, power which courts have consistently
18 upheld in the Commission's favor.

19 I'll now turn it over to Counsel
20 Cialino who will briefly recap the testimony the
21 third panel of witnesses provided in our prior
22 hearing, and after that summary, Ms. Cialino will
23 call Mr. DeSimone to testify.

24 Counsel, the floor is yours.

25 MS. CIALINO: Thank you, chair. As

1 the chair indicated, we are here to reconvene the
2 SCI's public hearing on the addiction rehabilitation
3 industry which was held on October 11th of this
4 year.

5 To refresh your memories about the
6 investigative findings detailed in that earlier
7 proceeding, I'm going to give a brief summary of the
8 testimony provided by SCI agents and other witnesses
9 regarding Kingsway Recovery Center.

10 Kingsway Recovery Center is an
11 outpatient addiction treatment facility located in
12 Mullica Hill, New Jersey. SCI forensic accountant,
13 Laura Mercandetti, testified that Kingsway only
14 accepts private insurance and self-pay clients. It
15 was explained by both SCI witnesses and an outside
16 witness that addiction rehabilitation industries --
17 excuse me, addiction rehabilitation facilities often
18 prefer clients who have private insurance over
19 Medicaid and Medicare, because private companies pay
20 at a higher rate for patient care which enables the
21 treatment center to maximize their profits.

22 At the public hearing, SCI agents
23 testified that patients did not always get the care
24 that they were supposed to receive at the facility.
25 Therapy sessions were often cut short from 45

1 minutes to as little as 15 minutes. Sometimes,
2 there were overlapping client services where clients
3 would be taken out of a therapy session early to
4 meet with a nurse or to get help writing a resume.
5 Insurance companies were still billed the entire
6 amount for these services. SCI agents also
7 testified that workers at the facility were
8 instructed to engage in certain unethical practices
9 such as contaminating the urine samples of clients
10 doing well in the recovery with those that were not,
11 as to make it seem as if the client was not making
12 progress, allowing Kingsway to continue billing
13 insurance companies for services at a higher rate.

14 The Commission also found evidence of
15 other questionable billing practices at Kingsway.
16 SCI agent, Karen Guhl, testified that her review of
17 billing records revealed evidence showing insurance
18 companies were billed by Kingsway for the same
19 services twice. In doing so, Kingsway was billed
20 for bundle addiction treatment services for a
21 patient and then billed again for the same patient
22 for the services that were included in the bundle
23 item by item. Agent Guhl testified that from her
24 review of the records, these questionable billings
25 were done, quote, done virtually every day on a

1 daily basis.

2 SCI agents testified that Kingsway
3 used Graceway Sober Living to house their patients.
4 Graceway Sober Living is run by Nicholas DeSimone's
5 wife, Michelle DeSimone. The Commission
6 investigation revealed that almost all of Graceway's
7 residents attended Kingsway for addiction treatment.
8 Graceway would lure clients in with enticements such
9 as little to no rent, meals, transportation, gifts
10 and other necessities that someone might need,
11 which, in turn, incentivized patients to attend
12 Kingsway. In return, since sober living facilities
13 cannot bill insurance companies for clients stays,
14 the insurance payments for treatment residents
15 received at Kingsway funded Graceway's operations.

16 Forensic accountant, Laura
17 Mercandetti, explained how over \$15 million in
18 health insurance proceeds, some of which were
19 obtained through duplicatus billing practices,
20 enabled Graceway to grow from one sober home to six
21 in a span of a few short years. The ill-gotten
22 gains also financed the DeSimones' lavish lifestyle
23 buying luxury goods and vehicles and pumping their
24 investment accounts with \$1-1/2 million in cash.

25 In addition to the deceptive billing

1 records, there were other red flags discovered in
2 the DeSimones' banking records that appeared
3 designed to avoid scrutiny of financial regulators.

4 Forensic Accountant Mercandetti
5 identified multiple instances of transactions that
6 were consistent with a practice known as
7 structuring, where a larger transaction is broken
8 into smaller transactions over several days to avoid
9 triggering federal banking reporting requirements
10 for amounts over \$10,000 in one day. The Commission
11 discovered many transfers from Kingsway's bank
12 account into the DeSimones' personal accounts in the
13 amount of \$9,000 on the same or consecutive days.
14 Agent Mercandetti testified that structuring may be
15 an indicator of money laundering, tax evasion or
16 other nefarious activity.

17 The Commission found that the
18 DeSimones also had a practice of transferring large
19 round dollar amounts regularly on the same day or
20 near consecutive days from Kingsway into their own
21 personal accounts. Agent Mercandetti testified that
22 there was a rapid movement of funds, meaning as soon
23 as the insurance money would hit the Kingsway
24 account it would be transferred out under lavish
25 lifestyle to also to fund their business operations.

1 The monies flowing through the various personal and
2 business accounts were also circular in nature with
3 money transfers among multiple accounts made in what
4 appeared to be an attempt to disguise the origin of
5 the funds which was the insurance money. For
6 instance, while no money went directly from Kingsway
7 to Graceway, only \$15,000 went directly from
8 Kingsway to Michelle DeSimone. Over \$1.5 million of
9 the insurance money received by Kingsway went to
10 fund Graceway Sober Living. Agent Mercandetti
11 testified that based on her experience, these types
12 of bank transfers were in line with money laundering
13 and tax evasion.

14 With that summary completed, at this
15 time I'd like to Nicholas DeSimone to come forward
16 and testify before the Commission. Also his
17 attorneys can come up with him.

18 MR. BROOKS: Good morning, Chair,
19 members of the Commission, Gilbert Brooks from the
20 firm of Duane Morris appearing on behalf of Mr.
21 DeSimone.

22 CHAIRWOMAN BREWER: Good morning.

23 MR. CAMINITI: Matt Caminiti from
24 Duane Morris also appearing for Mr. DeSimone.

25 CHAIRWOMAN BREWER: Good morning.

1 Good morning, Mr. DeSimone.

2 THE WITNESS: Good morning.

3 MS. CIALINO: If the witness could be
4 sworn in.

5 - - - -

6 NICHOLAS DeSIMONE, having been first duly sworn,
7 testified as follows:

8 - - - -

9 DIRECT EXAMINATION BY MS. CIALINO:

10 Q. Thank you. Good morning, Mr.
11 DeSimone. Before I begin my questioning of you,
12 there's several preliminary matters that I need to
13 bring to your attention. I'm going to read through
14 these instructions that go along with the public
15 hearing before I begin.

16 The Commission issued you a subpoena
17 pursuant to a duly adopted resolution. Accompanying
18 that subpoena was a general statement which
19 describes the subject of the Commission's
20 investigation. Attached to that subpoena was a
21 State Commission of Investigation's Enabling Statute
22 and Code of Fair Procedure. These documents
23 described your rights and responsibilities under the
24 Commission's Enabling Statute as well as any
25 restrictions imposed by law.

1 Since your testimony is taken under
2 oath, I need to ask you if you are under the
3 influence of any prescription or illicit drugs or
4 alcohol that would impair your ability to make
5 decisions and provide testimony today?

6 A. No.

7 Q. Again, since your testimony is taken
8 under oath, if you answer a question and you know
9 your answer is false, you could be charged with
10 perjury. Do you understand that?

11 A. Yes.

12 Q. Additionally, your attorney has
13 submitted five pages of questions ahead of this
14 hearing which I have reviewed and incorporated many
15 of them into the questions for you here today. If
16 there's anything that I failed to ask that you feel
17 is important that to be said and we be made aware
18 of, at the end of your testimony I will give you an
19 opportunity to make a statement for the record.

20 Do you understand that?

21 A. Yes.

22 Q. If you don't understand a question
23 that I ask or if you don't hear it, let me know and
24 I'll either repeat the question or have it read back
25 to you. Do you understand?

1 A. Yes.

2 Q. Now, it's my understanding that you
3 have an attorney present here today. Is that
4 correct?

5 A. Um-hmm, yes.

6 MR. BROOKS: Yes.

7 Q. Have you had the opportunity to
8 consult with your attorneys prior to this hearing?

9 A. Yes.

10 Q. Are you satisfied with your
11 attorney's representation at this point?

12 A. Yes.

13 Q. If at any point during your -- the
14 course of your testimony you need a break just to
15 take a break or to speak to your attorney, let me
16 know and I will give you the opportunity to do so.

17 Lastly, as I previously indicated
18 since your testimony is taken under oath, it will be
19 transcribed by the court reporter. If you feel your
20 testimony may tend to incriminate you in criminal
21 conduct, you may refuse to answer the question.

22 Have you gone over that right with
23 your attorney?

24 A. Yes.

25 Q. We will begin. If you could just

1 state your full name for the record?

2 A. Nicholas DeSimone.

3 Q. Did you have the opportunity to hear
4 the Commission's testimony related to Kingsway
5 Recovery on October 11, 2022?

6 A. Yes.

7 Q. Are you the owner and CEO of Kingsway
8 Recovery, LLC or as it's called, Kingsway Recovery
9 and Addiction Center in Mullica Hill?

10 A. Yes.

11 Q. Are there any other owners of
12 Kingsway?

13 A. No.

14 Q. Are you currently married?

15 A. Yes.

16 Q. What is your wife's name?

17 A. Michelle DeSimone.

18 Q. Does your wife, Michelle DeSimone,
19 own any companies that you are aware of?

20 A. Graceway.

21 Q. What is Graceway?

22 A. Transitional living homes.

23 Q. Outside of Graceway, do you know if
24 she owns any other companies?

25 A. Yes, I believe there's a

1 transportation company.

2 Q. Do you know what that's called?

3 A. Favor En Route.

4 Q. What is Favor En Route to your
5 knowledge?

6 A. Transportation company. That's it.

7 Q. Who does it transport?

8 A. Umm, people, people that have
9 addictions that are trying to stay in recovery.

10 Q. Now outside of owning Graceway and
11 Favor En Route, do you know if your wife has any
12 additional employment?

13 A. No.

14 Q. In addition to Kingsway Recovery, do
15 you own any other companies?

16 A. Yeah, one is called Renewed Light.
17 And then South Jersey Treatment Management Company,
18 but that's not active.

19 Q. What is Renewed Light?

20 A. It's a mental health outpatient.

21 Q. And are you the -- do you have any
22 other role besides owner of that facility?

23 A. No.

24 Q. What was the second one you said,
25 South Jersey --

1 A. Treatment Management Company.

2 Q. What is that?

3 A. It's actually being worked on by
4 Duane Morris right now, so we don't know the
5 actual -- what that is actually going to be yet.

6 Q. So it has not gotten off the ground
7 yet?

8 A. Yeah.

9 Q. When did Renewed Light, when did that
10 begin?

11 A. April.

12 Q. April of 2022?

13 A. Yes.

14 Q. What about D28 Real Estate?

15 A. I'm not sure when that was started.

16 Q. Is that a company that you are the
17 owner of?

18 A. Yes.

19 Q. What is D28?

20 A. D28 owns the building that Kingsway
21 operates out of.

22 Q. Does that have any other owners?

23 A. D28? No.

24 Q. Does it own any other property other
25 than the building that Kingsway operates out of?

1 A. Yes, it owns the property that
2 Renewed Light operates out of too.

3 Q. Any other companies that you
4 currently own?

5 A. No.

6 Q. Any other employment for you outside
7 of owning Kingsway, Renewed Light, D28 and South
8 Jersey Treatment and Management Company?

9 A. No.

10 Q. Do you take a salary from Kingsway?

11 A. Yes.

12 Q. What's your salary?

13 A. I'm sorry.

14 Q. Go ahead.

15 A. 65,000.

16 Q. Has that changed over time or has it
17 always been 65,000?

18 A. I believe it's been 65,000.

19 Q. When did Kingsway Recovery open?

20 A. It was like October, November 2018.

21 Q. Why did you decide to open Kingsway
22 Recovery back in 2018?

23 A. So, umm, starting at about 16 years
24 old, I developed a drinking problem. It continued
25 with me for years, you know, through athletics and

1 into my twenties working at different places and
2 through college and all that, you know, I was
3 drinking very heavily. I was sick a lot. I
4 couldn't, I couldn't perform well.

5 As that continued, I lost jobs. I
6 had to live at home with my parents for years. And
7 as I got into my latter twenties, I got into the
8 mortgage banking industry, and the reason I got into
9 that, the banking industry was because I didn't have
10 to be at work until 11:00 and I could work until
11 seven, so my hangovers weren't that bad at 11:00 and
12 I could get in to work, and so it was a great job
13 for me to drink with.

14 And so my addiction kept progressing,
15 and when there was the mortgage crash and
16 everything, I really -- I even got worse and I
17 started, you know, just drinking pints of vodka. I
18 lost my companies. I lost my houses -- well, my
19 house. I lost everything, and I had to go back in
20 my mid thirties to live with my parents and kept
21 drinking.

22 So I actually met my wife when I was
23 still drinking, so she -- I was okay at hiding it a
24 little bit, so she didn't -- she didn't know how bad
25 it really was, so when we decided to get married,

1 she found out that it was, it was really bad, you
2 know, that I was drinking two to three pints of
3 vodka a day, so she called off the wedding and I
4 went even lower, like so I kept drinking even more,
5 and I put myself into an IOP which helped, and --
6 but I kept relapsing out of that IOP. My living
7 environment wasn't -- my parents are very loving.
8 My parents are very loving, but it was where I drank
9 all the time, so my living environment kept causing
10 me to relapse, because it was like the origination
11 point of drinking and all that.

12 So at that point I had to -- I hit
13 like a crossroads and it was either I was going to
14 die or I was going to live. So I decided to live,
15 and I called my sponsor who got me into AA and I met
16 him at AA and we went in and it was like my first
17 meeting and I kind of took to it and so I stopped.
18 I stopped drinking and my life started getting
19 better, and then me and my wife re-engaged and I was
20 still in banking.

21 So I'm going to AA, I'm helping
22 people, right, I'm trying to like, you know, give
23 hope to people in AA, and then I would go back into
24 the banking world and it just didn't work anymore,
25 you know? I couldn't do it. I just wasn't the same

1 person, so I, umm, I decided to go back and get my
2 master's degree in addiction counseling, so I went
3 to Grand Canyon University and it was pretty neat,
4 because I didn't know at the time but I was
5 discipling underneath my pastor, and I was in a
6 coffee shop across the street where Kingsway was
7 going to eventually start, so it was pretty neat,
8 like, I just thought that was like a big God moment,
9 so I kept going with my pastor, talking to my wife,
10 and I decided to call my accountant, Joseph
11 Kornicki, and I said, you know, Joe, I, you know, I,
12 I'm in my master's program. I'm working at
13 different treatment modalities, and I said I think I
14 have the skill sets to open up my own treatment
15 center, and he goes I can help you and that's how
16 Kingsway really incepted. Then I went back with my
17 wife and I showed her, you know, the business plan
18 and the policy and procedures and all that stuff,
19 and she started crying, because it was, you know, it
20 was coming to life.

21 So she said okay. I didn't think she
22 was going to say okay, but we were living in a
23 basement at that point, because I went -- we were
24 living in our parents' basement because I went -- I
25 had to leave the banking industry and we -- I lost

1 two-thirds of my salary, so I was -- I wasn't making
2 much and she had to work three jobs while I was
3 working one job and going to school full time
4 getting my master's and then getting my Ph.D., and
5 then we opened the facility.

6 Q. So you mentioned you consulted with
7 your accountant at the time, Joseph Kornicki, to
8 open Kingsway. Did you consult with anyone else in
9 the addiction industry prior to opening up Kingsway?

10 A. Yes.

11 Q. Who was that?

12 A. Umm, I consulted with all my -- like
13 all my supervisors that were working with me in
14 different treatment facilities.

15 Q. So who were they?

16 A. James Bunti was one of them. I'm
17 trying to think who else. I'm not sure who else.
18 I'm sorry.

19 Q. Now, you talked a little bit about
20 your prior employment history your prior employment
21 background, and you mentioned you were in the
22 mortgage industry, the banking industry. Tell me
23 about your past employment. What exactly did you
24 do?

25 A. I don't understand.

1 Q. What were your jobs? I know mortgage
2 industry, but that's a big industry. What
3 specifically did you do in the mortgage industry?

4 A. I was a loan officer and then I ran a
5 franchise branch.

6 Q. What company is that?

7 A. Umm, it was called Nova Star and then
8 it was changed into Integrated Financial Group.

9 Q. So when you ran a franchise branch,
10 what were your job duties? What did that consist
11 of?

12 A. At that point it was more helping the
13 loan officers.

14 Q. So what exactly -- just give me a
15 little bit more information, since I'm not familiar
16 with the mortgage industry. What exactly does a
17 loan officer do?

18 A. A loan officer helps set up the loans
19 for a buyer or a person refinancing perhaps. It was
20 more refinancing accounts.

21 Q. So you're working with the client, I
22 guess?

23 A. Yeah, over the phone. A lot like
24 ever hear of Lending Tree and stuff like that?
25 Lending Tree, that's what we did. We were a big --

1 so I was internal. I needed that, because I needed
2 to be in that because I was drinking. I had sales
3 jobs before that when I was out in the road, and
4 that did not work for me, so it was good to be
5 around a team.

6 Q. So in addition to being a loan
7 officer and running a franchise branch of the
8 mortgage company, what other jobs have you had in
9 the banking industry?

10 A. That's it.

11 Q. So when did you stop working at these
12 places? What year was this?

13 A. I transferred into the addiction
14 treatment world in 2013.

15 Q. So when did you start working in the
16 banking or the mortgage industry?

17 A. About 2000.

18 Q. So from approximately 2000 to 2013
19 would you say?

20 A. Um-hmm.

21 Q. Yes?

22 A. Yes.

23 Q. Now, the -- when you -- 2013 when you
24 left the mortgage industry, what was your next job
25 after that?

1 A. I was interning at Maryville
2 residential treatment facility in Williamstown.

3 Q. As an intern, what did you do?

4 A. A lot of people there, a lot, I did
5 some groups, yeah.

6 Q. So when you said you did some groups,
7 would that be you ran a group therapy session?

8 A. Yeah.

9 Q. What would that consist of?

10 A. Just going through recovery points,
11 evidence based treatments, CBT, cognitive behavioral
12 therapy.

13 Q. After being an intern at Maryville,
14 what was your next job in the addiction industry?

15 A. Taking me back pretty far. Umm,
16 okay, so then I went to work at a methadone clinic.
17 My supervisor started working at a methadone
18 facility, and he wanted to get me experience over
19 there, so he recommended that I come over there with
20 him.

21 Q. What was the methadone clinic called?

22 A. Delaware Valley Medical.

23 Q. What did you do at the methadone
24 clinic?

25 A. I had a large caseload counseling

1 clients, ran some groups there.

2 Q. About what years was that?

3 A. That was the end of 2013 to 2015.

4 Q. After you left the methadone clinic
5 at Delaware Valley Medical, what did you do next for
6 work?

7 A. I had spent almost a couple years in
8 the methadone clinic, and that's a lot. I was
9 probably one of the most tenured counselors at that
10 point, but I wanted to get back out into more of a
11 recovery-based treatment, so I went and started
12 working at Genesis Counseling Services, and I was
13 located in Marlton.

14 Q. Say that again, you were what?

15 A. Genesis Counseling Services.

16 Q. What did you do there?

17 A. Ran groups, therapy to groups, did
18 one-on-ones.

19 Q. You did individual and group
20 counseling there?

21 A. Yeah, um-hmm.

22 Q. How long did you work at Genesis
23 Counseling Services?

24 A. That was about two years.

25 Q. So approximately 2015 to 2017?

1 A. Roughly, yes.

2 Q. How much did you get paid there?

3 A. 25,000 maybe.

4 Q. What about at the methadone clinic,
5 do you recall how much you got paid a year there?

6 A. About 29, 30.

7 Q. Now Genesis Counseling Services, when
8 you left there, where did you go next?

9 A. Okay, so when I left Genesis, I
10 had -- I went to -- I went into one of the private
11 care, so it was Victory Bay.

12 Q. Victory Bay is located where?

13 A. Laurel Springs.

14 Q. New Jersey?

15 A. Um-hmm, yes.

16 Q. What did you do at Victory Bay?

17 A. Did one-on-ones, ran groups.

18 Q. What was your salary there?

19 A. 50,000.

20 Q. How long were you at Victory Bay for?

21 A. About six or seven months.

22 Q. Why did you leave there?

23 A. I was let go.

24 Q. What was the reasoning that you were
25 let go? What were you told was the reasoning you

1 were let go?

2 A. I -- I -- I'm trying to think. I
3 got, I think I got into a small verbal argument
4 about therapies.

5 Q. Okay. Now, when you left Victory Bay
6 or when you were let go from Victory Bay, did you
7 have another job after that in the addiction
8 treatment industry?

9 A. Yeah, I worked part time at My
10 Friend's House while I was starting to set up
11 Kingsway.

12 Q. What is My Friend's House?

13 A. Another treatment facility.

14 Q. Outpatient, inpatient?

15 A. Outpatient.

16 Q. I'm sorry, just to make sure I'm
17 clear, Victory Bay, is that an outpatient treatment
18 center?

19 A. Yes.

20 Q. My Friend's House you said was part
21 time. How much were you getting paid for My
22 Friend's House?

23 A. Maybe about 500 a week.

24 Q. What was your -- what were your jobs
25 there?

1 A. Umm, I was just running therapy
2 groups.

3 Q. Both group and individual?

4 A. No, I wasn't doing individual.

5 Q. Group therapy groups?

6 A. Um-hmm, yes.

7 Q. Now when you left or -- did you have
8 any other jobs after My Friend's House or is that
9 when Kingsway opened?

10 A. That's when Kingsway opened.

11 Q. Is My Friend's House still in
12 business, do you know?

13 A. I'm not sure.

14 Q. Where was that located?

15 A. Woodbury.

16 Q. Now you also mentioned a little bit
17 about your educational background. You said you had
18 a master's in what?

19 A. Addictions counseling.

20 Q. When did you get that?

21 A. 2015.

22 Q. And where was that from?

23 A. Grand Canyon University.

24 Q. Where is that located?

25 A. Phoenix, Arizona.

1 Q. Were you out in Phoenix at the time
2 or was that remote?

3 A. Remote.

4 Q. Now -- so besides that master's in
5 addiction counseling, do you have any other degrees
6 or educational background?

7 A. Ph.D.

8 Q. Where did you get your Ph.D. from?

9 A. Grand Canyon University.

10 Q. What year was that?

11 A. 2020.

12 Q. What was, what is the Ph.D. in?

13 A. General psychology.

14 Q. With the Ph.D. in general industry,
15 what does that allow?

16 A. Psychology.

17 Q. Now, when you were running groups
18 back in 2013, 2014, is that something that you need
19 that master's in addiction counseling for or how
20 does that work?

21 A. Um-hmm, yes.

22 Q. So you got the master's in addiction
23 counseling in 2015. Prior to that, were you doing
24 counseling work?

25 A. Umm, I was doing counseling work as

1 an intern, so can I -- you want me to explain?

2 Q. Yeah, how does that work?

3 A. Let me explain it. When you're an
4 intern, you go underneath a supervisor and you could
5 be in school and whatever in the addiction treatment
6 world, so you can -- you don't start like -- you
7 don't start afterwards, you know.

8 Q. So you're interning and once you get
9 the degree, you can become an actual --

10 A. A certified addiction counselor or a
11 licensed.

12 Q. Now, do you know if there's any rules
13 as to, you know, how many interns can be, you know,
14 working as counselors at a treatment facility in
15 Jersey at a time?

16 A. There's -- I can't remember the
17 actual standard, but it's a 50/50 split is what's
18 supposed to happen at the treatment center.

19 Q. Now, I want to get back to or
20 actually just to back up, master's, Ph.D., do you
21 have a bachelor's degree?

22 A. Yes.

23 Q. What's that in?

24 A. Communications.

25 Q. Any other degrees or anything like

1 that, certificates --

2 A. Yes.

3 Q. -- that we haven't talked about?

4 A. Yes. I have an LPC, licensed
5 professional counselor. I'm an LCAD, licensed
6 clinical alcohol and drug counselor. I'm an
7 ICGC-II, that's a gambling counselor. I also hold a
8 couple supervisory certificates for mental health
9 and gaming.

10 Q. I want to get back to Kingsway. Does
11 Kingsway have a mission statement?

12 A. Yes, providing winning solutions,
13 providing winning solutions that cover --

14 Q. It's okay if you don't know it
15 verbatim.

16 A. Yeah, providing winning solutions
17 that cover the entire treatment.

18 Q. Okay, now has that mission statement
19 changed over time or has that been pretty much the
20 same since 2018?

21 A. It's the same.

22 Q. Now what type of company is Kingsway
23 Recovery, an LLC? A corporation?

24 A. It's an S Corp.

25 Q. What's your understanding of what an

1 S Corp. is?

2 A. An S Corp. is a business where you,
3 your kind of combined with the, your business and
4 personal accounts.

5 Q. Now, how long has Kingsway Recovery
6 been an S Corp.?

7 A. Umm, I would say 2019, I believe.

8 Q. And prior to 2019, what type of
9 company was Kingsway Recovery?

10 A. I believe it was an LLC. I'm not
11 sure though in that.

12 Q. Why was it switched to an S Corp.
13 sometime around 2019?

14 A. That was under the guidance of my
15 accountant.

16 Q. Joseph Kornicki or someone else?

17 A. Joseph Kornicki.

18 Q. Do you know why he advised you to set
19 it up that way?

20 A. I didn't understand.

21 Q. He told you, but you don't --

22 A. Yeah, I --

23 Q. All right. Now, when you first
24 opened Kingsway, so going back to 2018, end of 2018,
25 what was your role at the facility on a day-to-day

1 basis?

2 A. I was getting the billing company
3 hired and I was getting the electronic medical
4 records put in and working on getting staff hired.

5 Q. So that's kind of when you were first
6 opening?

7 A. Um-hmm.

8 Q. Yes?

9 A. Yes.

10 Q. At that time so you are setting up,
11 you are getting the billing company. Who was that
12 at the time?

13 A. It was called ReliaBill.

14 Q. You were getting the electronic
15 medical records system. What electronic medical
16 records system did you use?

17 A. KIPU.

18 Q. And you were hiring staff. Were you
19 doing any other day-to-day work in terms of were you
20 seeing patients or anything like that?

21 A. In the beginning, we had, you know,
22 just a very small amount coming in, so I was seeing
23 some patients.

24 Q. Seeing patients, does that mean you
25 were doing individual therapy sessions?

1 A. Yes, and groups. We had a very -- we
2 only had like three groups at night.

3 Q. Now as Kingsway grew as a treatment
4 center, did your role -- or how did your role
5 change?

6 A. I started kind of stepping back and
7 just, you know, help training everybody.

8 Q. So your title is the CEO; is that
9 correct?

10 A. Um-hmm.

11 Q. Yes?

12 A. Yes.

13 Q. So when you say you said help train
14 everybody, what do you currently do on a day-to-day
15 basis for Kingsway Recovery?

16 A. My interactions are with the director
17 of operations.

18 Q. And the director of operations
19 currently, who is that?

20 A. Rebecca Pera.

21 Q. How long has Rebecca been there?

22 A. Two-and-a-half years.

23 Q. Anybody else that you are currently
24 interact with at Kingsway Recovery?

25 A. Not really, not about the business.

1 Q. What about in terms of the
2 clinicians?

3 A. No.

4 Q. You have no interactions with them?

5 A. No.

6 Q. What about the billing department, do
7 you have any interactions with them?

8 A. No, no.

9 Q. So as CEO, you just talk to Rebecca,
10 what's her last name?

11 A. Pera.

12 Q. Power?

13 A. Pera, P-e-r-a.

14 Q. Who oversees -- so does Rebecca
15 oversee the day-to-day operation of the facility?

16 A. Yes.

17 Q. And she's done that for
18 two-and-a-half years or has her role changed over
19 time?

20 A. It's changed.

21 Q. Prior to her, who oversaw the
22 facility on a day-to-day basis?

23 A. Jessica Mercier.

24 Q. When did Jessica leave?

25 A. A few months ago.

1 Q. Do you know why she left or why she
2 told you she was leaving?

3 A. She had gotten another position,
4 better salary.

5 Q. When would you say, I know it's hard
6 to put an exact date on it, when would you say you
7 transitioned as CEO from, you know, being more hands
8 on to just interacting with the director of
9 operations at the facility?

10 A. '19, 2019.

11 Q. So since 2019, you really, when you
12 say you interact with the director of operations,
13 can you explain what you do?

14 A. Just talk to her about -- I talk to
15 her about how the culture is. I'm big on the
16 culture.

17 Q. Do you handle hiring for Kingsway
18 Recovery?

19 A. No.

20 Q. Do you meet with people before they
21 are hired kind of as the final step before they are
22 offered a job?

23 A. No.

24 Q. So how many times a day are you
25 talking to Rebecca or let's say your director of

1 operations since 2019?

2 A. I -- few times a day.

3 Q. So is it a conversation on the phone?
4 Are they conversations in person? Can you explain a
5 little more? I'm trying to get a sense of what
6 you're actually doing on a day-to-day --

7 A. I meet with her at the facility, and
8 then I talk to her on the phone.

9 Q. What are those conversations about?
10 Just how -- can you explain a little more about what
11 you're talking about?

12 A. Umm, just about how everybody's
13 working together, because I believe, you know, if
14 the culture is good at the facility, then it will
15 trickle down to the clients.

16 Q. So besides your concern of the
17 culture at the facility, which I understand there's
18 nothing else you discussed with the director of
19 operations on a regular basis?

20 A. That's the main part of it.

21 Q. What are the other parts?

22 A. Umm, like operational things.

23 Q. Like?

24 A. We are putting on an expansion, so I
25 talked to her about that.

1 Q. Okay. How would you define your role
2 as like the title CEO, what does that mean to you?

3 A. Means that I'm helping build the
4 facility.

5 Q. Build the company or build the
6 facility?

7 A. Build the company.

8 Q. Now, in your role as CEO, have you --
9 do you have access to the KIPU system, the
10 electronic medical records system?

11 A. Yes.

12 Q. Do you review any KIPU records as
13 part of your job as CEO?

14 A. No.

15 Q. Have you ever reviewed KIPU records
16 in your job as CEO?

17 A. No.

18 Q. Now, have you ever instructed
19 employees how to input information into the KIPU
20 system?

21 A. No.

22 Q. So who handles that?

23 A. The clinical director.

24 Q. So who's the clinical director?

25 A. James Martinez.

1 Q. How long has James been the clinical
2 director?

3 A. About six or seven months.

4 Q. Prior to James being the clinical
5 director, who was the clinical director at Kingsway?

6 A. Jessica Mercier.

7 Q. Was that before Jessica was director
8 of operations or was she both clinical director and
9 director of operations at the same time?

10 A. She did both.

11 Q. Who does the clinical director report
12 to?

13 A. Rebecca.

14 Q. The director of operations?

15 A. Correct.

16 Q. And then the director of operations
17 reports to you, correct?

18 A. Um-hmm.

19 Q. Who else reports to the director of
20 operations?

21 A. The director of admissions, the
22 director of HR, the controller, billing team.

23 Q. Now, so when Jessica Mercier was both
24 the director of operations and the clinical
25 director, I guess she reported to you as -- well

1 essentially as clinical director in addition to the
2 director of operations, correct?

3 A. Yes.

4 Q. Can you tell me a little bit about
5 the services that Kingsway Recovery offers?

6 A. Partial care, intensive outpatient,
7 and outpatient.

8 Q. So you said patient care, is that
9 partial hospitalization or PHP?

10 A. It's partial care. That's a weird
11 terminology that people throw out there and stuff.
12 It's partial care. That's what we call it.

13 Q. Can you explain what partial care
14 consists of?

15 A. It consists of five-hour days. The
16 clients there for five hours, five days a week.

17 Q. During that five hours that they are
18 at the facility, what type of services are partial
19 care patients receiving?

20 A. Group, yeah, group, group services.

21 Q. Group therapy for five hours?

22 A. Yes.

23 Q. Any other care that they are provided
24 or services they are provided?

25 A. Umm, you know, they come into the

1 facility and they may have a medical, they might see
2 the doctor.

3 Q. They might see the doctor?

4 A. They get set to see the APNs for
5 medications.

6 Q. APN is advanced practice nurse?

7 A. Yes.

8 Q. And you mentioned a doctor. Is there
9 a doctor at the facility?

10 A. There is. It's Dr. Wilkins.

11 Q. How often is Dr. Wilkins at the
12 facility?

13 A. He works with the APN. The APN is at
14 the facility a lot.

15 Q. So is he actually at the facility or
16 does he oversee the APN?

17 A. He oversees the APN in a
18 collaborative group.

19 Q. Does the doctor ever actually see
20 Kingsway patients face-to-face?

21 A. I'm not sure. There may be
22 instances. I'm not sure.

23 Q. But not regularly?

24 A. No.

25 Q. So the APN, if somebody needs to see

1 the APN, what would be an example of why?

2 A. Umm, they would want to see the APN
3 for prescriptions.

4 Q. Are these prescriptions related to
5 recovery from addiction issues?

6 A. Yeah, yes.

7 Q. What type of prescriptions are we
8 talking?

9 A. Umm, I just know psychotropic
10 medications.

11 Q. So do they have individual therapy
12 sessions, these people who are receiving partial
13 care at Kingsway?

14 A. I believe so, yes.

15 Q. So is that on a daily -- they are
16 there five days a week. Is that every single day
17 that they are there they receive?

18 A. No.

19 Q. Okay. How many days a week do they
20 receive individual one-on-one therapy session?

21 A. Once.

22 Q. Okay. Once a week. How long is that
23 supposed to last?

24 A. 45 minutes.

25 Q. Any other services that patients

1 receiving partial care get at Kingsway?

2 A. Not to my knowledge.

3 Q. So group, nursing and individual,
4 correct? Yes?

5 A. Yes.

6 Q. What about case management services,
7 are those something that Kingsway offers?

8 A. Yes.

9 Q. What does that mean when I say case
10 management services?

11 A. So if a client has to -- like, has
12 like a legal issue or something, the case manager
13 will help them.

14 Q. What other types of issues could the
15 case manager help a patient with?

16 A. Setting up appointments.

17 Q. With?

18 A. The various -- anything that's going
19 on in their life.

20 Q. How often are partial care patients
21 typically seeing case management employees?

22 A. I don't know.

23 Q. There's not like a standard. Is it
24 more as needed?

25 A. Yes.

1 Q. And --

2 CHAIRWOMAN BREWER: I'm going to jump
3 in and ask a quick question before we get too far
4 from where my question was. I'm just trying to
5 follow your testimony with respect to the nursing
6 services. I thought I heard you say the clients are
7 coming to the nurses when they need prescriptions?
8 Is that correct?

9 THE WITNESS: Well, the APNs
10 prescribe medications, so they'll have a scheduled
11 meeting with them.

12 CHAIRWOMAN BREWER: But they are
13 meeting with them -- are the patients going to the
14 nurse and saying I need prescriptions?

15 THE WITNESS: No.

16 CHAIRWOMAN BREWER: Are there
17 appointments with the nurses for them to assess
18 whether they actually need prescriptions? I just
19 want to clarify that.

20 THE WITNESS: They schedule when they
21 are going to see the APN.

22 CHAIRWOMAN BREWER: Okay. Thank you.

23 BY MS. CIALINO:

24 Q. Okay, now for IOP or intensive
25 outpatient, how does that compare to partial care?

1 How many days a week are the clients at Kingsway?

2 A. It's usually three days a week, three
3 hours a day.

4 Q. And do they receive individual
5 therapy?

6 A. Yes.

7 Q. Once a week still?

8 A. Yes.

9 Q. 45 minutes?

10 A. Yep.

11 Q. And then group therapy?

12 A. Yes.

13 Q. And that's every day?

14 A. Usually three times a week.

15 Q. Every day that they are there?

16 A. Yes.

17 Q. Then they receive case management
18 services?

19 A. I believe so.

20 Q. Anything else that IOP receives or
21 any difference than partial care other than the
22 amount of time that the patient is at the facility?

23 A. It's more about the amount of time.

24 Q. Now what about outpatient?

25 A. Outpatient is one hour a day group.

1 Q. Is that a set number of days a week,
2 or is that just depends on the patient?

3 A. Depends on the patient.

4 Q. What about do they receive individual
5 therapy sessions?

6 A. Yes.

7 Q. Case management services?

8 A. Yes.

9 Q. Does Kingsway offer inpatient
10 services?

11 A. No.

12 Q. What about detox. Does Kingsway
13 offer detox?

14 A. No.

15 Q. Why is Kingsway set up to only offer
16 outpatient services? Why did you decide to set it
17 up that way?

18 A. Because that's where recovery begins,
19 so when you're in a detox or in a residential
20 treatment facility, it's more of a medical
21 stabilization, so when you come to an outpatient,
22 that's where you're in the outside world so you are
23 feeling stresses of the outside world, and you --
24 that's where you start really recovery. That's what
25 I believe.

1 Q. Okay. What insurance does Kingsway
2 accept or what type of insurance?

3 A. Do you mean a private insurance?

4 Q. Yeah. Do they accept private,
5 Medicaid, Medicare?

6 A. Private.

7 Q. Is Kingsway in network with any
8 insurance providers?

9 A. Yes.

10 Q. Which ones?

11 A. Total Care Network and Allied Trades.

12 Q. How long -- I'm sorry?

13 A. Looking for a third one right now.

14 Q. How long has Kingsway been in network
15 with those two companies you mentioned?

16 A. I'm not sure. It's been a while.
17 I'm not sure.

18 Q. Does Kingsway also accept
19 out-of-network insurance policies?

20 A. Yes.

21 Q. Does Kingsway accept self-pay
22 clients?

23 A. Yes.

24 Q. How did you make the decision to
25 accept, you know, specifically private insurance

1 versus, you know, trying to go the Medicaid Medicare
2 route?

3 A. So for five years I worked in mostly
4 Medicaid facilities, and the amount of paperwork
5 that I saw was really, I think, holding back a
6 little bit from client care, so I knew private care,
7 I think, we can get more, just more time and more
8 when we do clinical techniques with the clients, and
9 I was talking to my, again, supervisors and they
10 said with my background and everything, I'd be good
11 at private care, so that's the way we went, but, you
12 know, there was no guarantees or anything that it
13 was going to be successful.

14 Q. What about your background made your
15 prior supervisors suggest that you'd be good at
16 private care?

17 A. My recovery.

18 Q. Because of?

19 A. Because of the way I was, you know,
20 counseling people.

21 Q. Okay. Now is Kingsway licensed by
22 the State of New Jersey?

23 A. Yes.

24 Q. What -- if you could recall back in,
25 you know, 2018, what did you do to obtain that

1 licensing?

2 A. Its policy and procedures and then
3 getting the facility, and then, you know, together
4 that got the place licensed.

5 Q. So you needed to make policies and
6 procedures for the treatment center?

7 A. It was an administrative side and
8 then there's the operational side, which is the
9 facility.

10 Q. Do you remember what type of
11 paperwork the state asked for in addition to these
12 policies and procedures?

13 A. No.

14 Q. Did they ask for any financial
15 documents or information relating to your personal
16 finances?

17 A. I don't recall that.

18 Q. Do you recall if they asked about any
19 investors, if you had any investors to open a
20 facility?

21 A. I don't know if that's on the
22 paperwork. I don't remember.

23 Q. Now, from the time you began working
24 to get the license to the time you actually received
25 it from the state like when you submitted the

1 paperwork, how long did it take to actually get that
2 license from the state, if you recall?

3 A. A little under a year and a half.

4 Q. And do you recall approximately how
5 much money you spent, you know, in total, whether
6 that includes if you needed to hire lawyers or
7 whatever you needed to do to get that license. Do
8 you recall about how much that was, that cost you?

9 A. Can you repeat that? What are you
10 specifically --

11 Q. Just how much it cost you total to
12 start this facility up to get the licensing, to get
13 the facility, what kind of start-up costs, including
14 the paperwork that you need to submit to the state?

15 A. To get it going was about 120,000.

16 Q. Now, how many clients does Kingsway
17 currently have?

18 A. Umm, 30.

19 Q. Since 2018, what's the most at a time
20 clients that Kingsway's had?

21 A. Maybe higher 40s.

22 Q. Is there like a maximum amount that
23 Kingsway can have at the time or is at the
24 discretion of the facility?

25 A. I'm not sure.

1 Q. You'd say high 40s was the most that
2 Kingsway had?

3 A. I believe so.

4 Q. Is 30, you know, approximately 30, is
5 that the average it's been across 2018 to today's
6 date?

7 A. No. I think it's been closer to 40
8 maybe, higher 30s.

9 Q. Now what does Kingsway do to market
10 itself to get clients to come?

11 A. The digital marketing.

12 Q. What does that mean?

13 A. So we do a lot of digital marketing
14 on Google. It's called PPC and ASCO campaign.

15 Q. What does it consist of? I know you
16 say on Google. What does it consist of?

17 A. Advertising on the website and on
18 Google.

19 Q. Is that like you are getting Kingsway
20 to come up in search results?

21 A. Yes.

22 Q. Is that simply putting ads out there
23 on other websites?

24 A. Correct.

25 Q. All of the above. Any other ways

1 Kingsway gets clients other than marketing on the
2 internet?

3 A. That's one way.

4 Q. What are the other ways?

5 A. So we receive clients from inpatient
6 facilities.

7 Q. Okay. What inpatient facilities does
8 Kingsway typically receive clients from?

9 A. All of them.

10 Q. Every single one?

11 A. There's a lot. We'll get clients
12 from different ones, yeah.

13 Q. Is there like ones that you get more
14 clients from?

15 A. Over the span of time, not really.

16 Q. Name some that you recall receiving
17 clients from?

18 A. Malverne, Mirmont and Life Solutions.

19 Q. Now how does that work? Does
20 Kingsway have a marketing team?

21 A. Admissions team.

22 Q. So admissions handles the marketing?

23 A. Yeah.

24 Q. Or do you hire an outside company to
25 do marketing?

1 A. They would call into the admissions
2 office and they would -- that's how they would get
3 the client, so like an inpatient would call in with
4 the client.

5 Q. Does Kingsway work to have
6 relationships, you know, with inpatient facilities
7 in order to get, you know, that they have a client
8 who needs care, you know, think of Kingsway, is that
9 part of the marketing plan?

10 A. I mean, I guess that there's a
11 relationship there.

12 Q. Who's making this relationship?

13 A. The director of admissions.

14 Q. Who's that?

15 A. Jimmy McDonnell.

16 Q. McDonnell, you said?

17 A. Um-hmm.

18 Q. Who does that individual report to?

19 A. Rebecca Pera.

20 Q. Does Kingsway have relationships
21 with, you know -- when you say inpatient, are you
22 talking detoxes or simply inpatient treatment
23 centers?

24 A. Both.

25 Q. In terms of detoxes, what facilities,

1 you know, does Kingsway often receive clients from?

2 A. Well, that was Enlightened Solutions.

3 Q. So those you were referring to
4 detoxes -- I don't know if you were referring --

5 A. They are both.

6 Q. Now, if somebody who's attending
7 Kingsway uses drugs again or alcohol again and
8 relapses, are they supposed to go back to detox?

9 A. That's a clinical decision made by on
10 a case-by-case basis.

11 Q. Okay. So typically, so it's a
12 case-by-case basis. Let's say the clinician at
13 Kingsway decides that based on their determination
14 that the patient needs to go back to detox, how is
15 that handled? Is there referrals made to specific
16 detoxes? Is it just hey, you've got to figure out
17 where you're going? How does it work?

18 A. They'll assist the client in getting
19 to a facility.

20 Q. So assist the client, would they make
21 the calls, just explain to me a little bit more
22 about how those referrals work?

23 A. So the admission person would call
24 the client and say that they have three -- they give
25 them three different options, you know, to different

1 facilities.

2 Q. Now who's coming up with the three
3 different options for them to go to, who at
4 Kingsway?

5 A. The person in the admissions.

6 Q. Somebody in the admissions
7 department?

8 A. Yes.

9 Q. Currently who handles that duty?

10 A. Jimmy McDonnell.

11 Q. Is it the director of admissions that
12 does that?

13 A. Yes.

14 Q. Prior to Jimmy McDonnell, who was the
15 director of admissions?

16 A. Ryan McDonohue.

17 Q. How long has Jimmy been the director?

18 A. Ten, 11 months.

19 Q. Now, do you know, when you were
20 talking about three facilities, you know, detoxes,
21 let's say, that the person's being referred to, how
22 does Jimmy come up with that list of three
23 facilities?

24 A. I'm not sure.

25 Q. Okay. Is it written down anywhere in

1 your electronic medical records in the KIPU system
2 as to where that client is offered, you know,
3 options as to go back to detox?

4 A. I'm not sure.

5 Q. Now, does Kingsway give scholarships
6 to clients?

7 A. I would say that the scholarship, if
8 there's -- it's more of a non-pay extension is what
9 we offer. So if somebody's insurance terms out,
10 the -- we wouldn't abandon the client. We would
11 give them a non-pay extension. So the staff can
12 find different opportunities or, you know,
13 different --

14 Q. Let's take right now. How many
15 people are on -- I'm going to refer to it on
16 scholarship, if that's okay, or non-pay. How many
17 people at Kingsway are non-pay?

18 A. I don't know.

19 Q. Who makes the determination if the
20 client or a patient is going to be a non-pay status?

21 A. Rebecca.

22 Q. That's not run by you?

23 A. No.

24 Q. And you're not made aware of how many
25 clients at a time at your own facility are paying or

1 insurance is paying versus are a non-pay?

2 A. No.

3 Q. How many employees does Kingsway
4 currently have?

5 A. I would say about 30.

6 Q. Has that number stayed approximately
7 the same over that course, you know, once you guys
8 got on your feet in 2019 through today?

9 A. Yeah, it's grown a little bit.

10 Q. Now, Kingsway has a facility in
11 Mullica Hill, correct, but they also have offices in
12 another location, administrative offices?

13 A. Yes.

14 Q. Now, when you personally go in to
15 work at Kingsway, are you going to the treatment
16 center location or the administrative offices?

17 A. The administrative office.

18 Q. When did those administrative offices
19 open?

20 A. 2019.

21 Q. Around 2019 sometime?

22 A. I think so. I'm not sure.

23 Q. How often do you go to the actual
24 facility in Mullica Hill?

25 A. Not often.

1 Q. When you say not often, like once a
2 month?

3 A. I haven't been there in months.

4 Q. Has that always been the case, or is
5 there a time when you went to that facility in
6 Mullica Hill more often?

7 A. Maybe more, but once a month before
8 that.

9 Q. As CEO, do you hold weekly or monthly
10 staff meetings?

11 A. The director of operations holds the
12 staff meetings. There's an all-staff meeting.
13 There's clinical meetings.

14 Q. Are you present at any of those?

15 A. I was going to directors meetings,
16 but I don't do that anymore.

17 Q. Why not?

18 A. I like them to work it all out. I
19 like them to be empowered.

20 Q. So you're not present at all staff or
21 director meetings?

22 A. No.

23 Q. And at any point did you used to be
24 present at those meetings?

25 A. I would stop in once in a while.

1 Q. Okay, so you've never ran the
2 meetings?

3 A. No.

4 Q. Okay. Before I move on, I want to
5 see if the commissioners at this point have any
6 questions for you?

7 CHAIRWOMAN BREWER: I just have one
8 question, back to your comments about private pay
9 clients. I think you said that it was recommended
10 to you that you have a background that would assist
11 private pay clients. Can you explain how, what sort
12 of payment that client has, how that correlates to
13 your actual background? Can you explain that to me?

14 THE WITNESS: Okay, how it correlates
15 to my background? Okay, so a lot of the private pay
16 clients are -- they are not mandated to come in to
17 treatment, okay? So they don't have a DUI. They
18 don't have drug court or anything like that. They
19 are more apt to accept more of a spiritual and
20 evidence-based treatment.

21 CHAIRWOMAN BREWER: Okay. You had
22 also mentioned the paperwork involved in non-private
23 pay clients. Is that something that went into the
24 decision-making as to whether to accept them as
25 clients or not is the amount of paperwork, or can

1 you clarify what you meant when you referenced the
2 amount of paperwork that was involved?

3 THE WITNESS: It was just more of a,
4 you could focus more on the care and not as much as
5 on the paperwork.

6 CHAIRWOMAN BREWER: How -- can you
7 just describe for me a little bit, what was that
8 burden like as far as the paperwork? Was it
9 something that -- just describe to me what was the
10 dynamic that would even make you think that
11 attending to that paperwork was actually taking away
12 from client care?

13 THE WITNESS: Attending to it was, I
14 mean, it was cumbersome. It was like a little bit
15 more than we do in the private care, so it was just
16 taking away, you know.

17 CHAIRWOMAN BREWER: Could you
18 describe to me some of the differences between what
19 the paperwork aspect is like? And just so you know,
20 one of the purposes of this Commission is also to
21 recommend regulatory changes potentially, so my
22 questions are really to surface just a better
23 understanding of what are some of these differences
24 that went into your decision-making.

25 THE WITNESS: You know, maybe -- I'm

1 going to say it was, if you really want to get like
2 more on the specific end of that, it was more of the
3 EMR systems were very cumbersome and when I was
4 working in that care, and then if you look into more
5 of the one that we utilize now that it was, it's
6 easier to navigate.

7 CHAIRWOMAN BREWER: Okay. And the
8 only other question I had was you described earlier
9 on in your testimony the reporting requirements to
10 you as CEO. The person that oversaw operations,
11 first of all, I'm sorry, let me ask, did you have a
12 CFO? Did you have any sort of chief financial
13 officer?

14 THE WITNESS: I have a controller.

15 CHAIRWOMAN BREWER: What is that
16 person's reporting relationship to you?

17 THE WITNESS: She reports to Rebecca.
18 She reports to the director of operations.

19 CHAIRWOMAN BREWER: And the director
20 of operations reports to you.

21 THE WITNESS: Correct.

22 CHAIRWOMAN BREWER: Thank you.

23 MS. CIALINO: Any additional
24 questions?

25 BY MS. CIALINO:

1 Q. Now, I want to switch gears here a
2 little bit. Between 2018 and 2021, in terms of the
3 amount of money that Kingsway Recovery brought in
4 from insurance companies, approximately \$15 million,
5 does that sound correct?

6 A. Correct, yeah.

7 Q. And who were the -- actually, during
8 that time, the two biggest health insurance
9 companies paying Kingsway were Horizon Blue Cross
10 Blue Shield at approximately 8.7 million and Aetna
11 with approximately 2 million. Does that sound
12 correct?

13 A. I believe so.

14 Q. Now, in terms of the insurance
15 companies, do different health insurance companies
16 or maybe even within the health insurance companies,
17 different health insurance policies pay up different
18 amounts for the same treatment?

19 A. To my knowledge, they all pay
20 different amounts.

21 Q. Was there any -- if you know, were
22 there certain insurance policies or insurance
23 companies that paid more for additional treatments
24 such as PHP or IOP in New Jersey?

25 A. I don't know.

1 Q. You don't know which ones paid out
2 the most per client?

3 A. For?

4 Q. Let's just say for PHP?

5 A. I don't know.

6 Q. Okay. Do you know if there's certain
7 policies -- you don't know if there's certain
8 policies even within Horizon Blue Cross Blue Shield
9 that paid out the most?

10 A. I'm trying to think. I can't recall.

11 Q. Okay. Now, do you handle the
12 finances and banking on behalf of Kingsway Recovery?

13 A. I don't know what you mean by that.

14 Q. Well, let's start, what bank
15 institutions does Kingsway Recovery use?

16 A. Columbia and PNC.

17 Q. Who has signatory authority on
18 Kingsway's accounts at Columbia Bank?

19 A. Me.

20 Q. Anybody else?

21 A. I believe our controller has some
22 type of signature.

23 Q. Who's the controller?

24 A. Stacy Troup.

25 Q. T-r-u-e?

1 A. T-r-o-u-p.

2 Q. Troup, okay.

3 A. Yeah.

4 Q. How long has Stacy Troup been the
5 controller at Kingsway?

6 A. I believe it's about a year.

7 Q. Now, prior to Stacy, was there
8 somebody else who acted as the controller at
9 Kingsway?

10 A. We had the bookkeepers.

11 Q. But no controller?

12 A. No.

13 Q. Prior to Stacy then who were the
14 bookkeepers?

15 A. It was Alloy Silverstein.

16 Q. And who else?

17 A. That's it.

18 Q. So how long was Silverstein a
19 bookkeeper at Kingsway?

20 A. Since the facility began.

21 MR. BROOKS: First part of
22 Silverstein?

23 A. Alloy.

24 Q. Alloy Silverstein. So they were an
25 outside vendor who did the bookkeeping?

1 A. Yes.

2 Q. Now, in terms of that PNC account or
3 accounts that Kingsway has, does anyone else have
4 signatory authority besides you on that account?

5 A. I believe not.

6 Q. Who handles the check deposits
7 currently on behalf of Kingsway Recovery?

8 A. Stacy -- the controller.

9 Q. For that approximate year she's work
10 at Kingsway, has she always handled the check
11 deposits?

12 A. Yes.

13 Q. How does that work? Do checks that
14 Kingsway receives, do they come directly to her or
15 do they go somewhere else and then she retrieves
16 them? How does that work?

17 A. I'm getting a little confused.

18 Q. Is she at the facility or at the
19 administrative offices?

20 A. Yes.

21 Q. So when checks come in, they come to
22 Kingsway Recovery, they go directly to her?

23 A. Can I ask you a question?

24 Q. Umm --

25 A. You are confusing me with this. I

1 think we're --

2 Q. Can you explain?

3 A. Yes. You mean check -- what do you
4 mean by checks?

5 Q. Checks from insurance companies,
6 checks from patients, check like those?

7 A. Oh, any check that would come into
8 the, come into the facility and then it would be
9 Rebecca would handle it from there. Stacy or
10 Rebecca would handle it with the billing.

11 Q. Okay. What do you mean, "handle it
12 with the billing"?

13 A. They would bring the check to make
14 sure that they had a copy of the check, and then
15 Stacy would take the check to the bank.

16 Q. Okay. Now, prior to Stacy working as
17 a controller, who handled the depositing checks that
18 Kingsway received into their bank accounts?

19 A. Me.

20 Q. Now, why did you end up hiring a
21 controller approximately a year ago?

22 A. Company was growing.

23 Q. Did you feel it was something you
24 couldn't handle or you didn't have time to handle
25 or --

1 A. It was just more of a growth thing.

2 Q. Okay. So the company was growing and
3 what, you felt you needed a controller?

4 A. Yeah, I felt like it was time to get
5 a controller, and it helped more with the
6 bookkeepers and everything, then combined I thought
7 was nice.

8 Q. Did anybody advise you that you
9 should have a controller or did you make that
10 decision on your own?

11 A. Made it on my own.

12 Q. Now, in terms of withdrawals from
13 Kingsway's bank account, are there -- who would
14 handle the withdrawal of money from Kingsway's bank
15 account?

16 A. A withdrawal? Was me.

17 Q. You, okay. Does anyone else outside
18 of you or Stacy have access to Kingsway's bank
19 accounts?

20 A. No.

21 Q. Now, in terms of transfers of money
22 from Kingsway's bank accounts to your personal
23 account or another account, you know, in your name,
24 who handles those?

25 A. Me.

1 Q. Okay. Have you always handled those
2 since Kingsway's been open?

3 A. Yes.

4 Q. Does your wife ever transfer money
5 from Kingsway's bank accounts to a joint account in
6 your name, your name and her name, sorry?

7 A. No.

8 Q. Does Kingsway have any debit cards?

9 A. No.

10 Q. Has Kingsway ever had any debit
11 cards?

12 A. No.

13 Q. Does Kingsway have any credit cards?

14 A. Yes.

15 Q. Who has access to Kingsway's credit
16 cards?

17 A. I'm not sure. That would be a
18 question for director of operations.

19 Q. What are Kingsway's credit cards used
20 for?

21 A. Operational stuff at Kingsway.

22 Q. Like when you say operational stuff,
23 what are we talking about?

24 A. Paper, the desks, computers.

25 Q. So supplies?

1 A. Supplies.

2 Q. Do you review all purchases that are
3 made on the Kingsway credit cards?

4 A. No.

5 Q. Who would review that?

6 A. Stacy.

7 Q. Prior to Stacy getting there a year
8 ago, who would you at that time, you know, have
9 review the credit card transactions?

10 A. Well, Alloy Silverstein would do that
11 too.

12 Q. How would Alloy Silverstein -- what
13 would they do to review them?

14 A. They would go over, I guess, the
15 QuickBooks or through the QuickBooks. They would
16 review what came in.

17 Q. And what would they do with that
18 information, would they present it to you?

19 A. Yes.

20 Q. So what would they say, like X amount
21 of money was spent on this or how did it go?

22 A. Yeah, like that. They would call.

23 Q. Sorry?

24 A. Yeah, they would call.

25 Q. How often would you speak to Alloy

1 Silverstein on the phone?

2 A. Once every few months.

3 Q. And what -- okay. Now, was there any
4 internal policies at Kingsway in terms of, you know,
5 what documentation needs to be kept or what needs to
6 be done prior to somebody making a purchase on
7 behalf of Kingsway through credit cards?

8 A. I'm not sure. Again, that was prior
9 to the director of operations.

10 Q. Now has the director of operations
11 ever reported to you how much money is being spent
12 on these credit cards or any issues with anything
13 related to these credit cards?

14 A. No.

15 Q. Do you recall ever having a
16 discussion with the director of operations about
17 Kingsway's credit cards?

18 A. No.

19 Q. Now, so in terms of bookkeepers,
20 currently does the controller handle the bookkeeping
21 for Kingsway?

22 A. Yes.

23 Q. So what does Stacy do in terms of
24 bookkeeping on Kingsway's behalf?

25 A. She does a lot of like accounts

1 payable.

2 Q. What else?

3 A. She handles the QuickBooks.

4 Q. Okay. What type of information is
5 put into QuickBooks?

6 A. Umm, I'm not sure.

7 Q. So she currently -- Stacy currently
8 makes entries into QuickBooks on behalf of Kingsway?

9 A. Yeah.

10 Q. So prior to Stacy, who made the
11 entries into QuickBooks on behalf of Kingsway?

12 A. Alloy Silverstein.

13 Q. Where did Alloy Silverstein get the
14 information to input into QuickBooks?

15 A. From the bank accounts.

16 Q. Say it again?

17 A. From the accounts.

18 Q. From the accounts themselves?

19 A. Yeah.

20 Q. So how did that work? Would you
21 print out the account information, hand it over to
22 Alloy Silverstein?

23 A. I think it was connected.

24 Q. So they could view the Kingsway's
25 bank records?

1 A. Yeah, it was -- yeah, they connected.

2 Q. So bank account in QuickBooks are
3 connected is what you're saying?

4 A. Yes.

5 Q. The information from the bank records
6 would go automatically into Kingsway's QuickBooks?

7 A. Correct, I believe so.

8 Q. Did you ever review, since Stacy has
9 been controller, have you reviewed Kingsway's
10 QuickBooks information?

11 A. No.

12 Q. Prior to Stacy when Alloy Silverstein
13 were the bookkeepers, did you ever review the
14 QuickBooks?

15 A. No, I never reviewed them.

16 Q. Did anybody at Kingsway, especially
17 when Alloy Silverstein was the outside entity was a
18 bookkeeper, did anybody from Kingsway ever review
19 the QuickBooks?

20 A. No.

21 Q. Why not?

22 A. Alloy Silverstein would call me if
23 there was an issue.

24 Q. Okay, what type of issues would they
25 call you about?

1 A. They would just say hey, you know,
2 you're spending this for this, what is, you know,
3 the breakdown different things that would be.

4 Q. So would Alloy Silverstein provide
5 you to an end of the year, you know, snapshot of
6 Kingsway's finances or their, I guess, accounts
7 payable, account receivable, all that?

8 A. No. I would ordinarily get that.

9 Q. You wouldn't really get it or --

10 A. I can't remember. I might have
11 gotten something from them, but I don't remember.

12 Q. Was there anybody at that time from
13 Kingsway who was an actual employee of Kingsway who
14 would review the accounts payable/accounts
15 receivable on a yearly basis?

16 A. No.

17 Q. What about profit and loss statements
18 and those other type of records, balance sheets?

19 A. I would look at the profit and loss.

20 Q. So you would look at profit and loss.
21 What else would you look at?

22 A. That was about it.

23 Q. What were you looking for when you
24 were looking at the profit and loss statements?

25 A. If we were a viable business.

1 Q. How often would you look at the
2 profit and loss statements of Kingsway?

3 A. Maybe once a month.

4 Q. Who provided you those profit and
5 loss statements?

6 A. I have -- so I would -- I would have
7 the profit and loss statement.

8 Q. Where would you get that information
9 from?

10 A. I had like a little profit and loss
11 thing.

12 Q. Okay, so where would you get the
13 information that you're inputting into the profit
14 and loss sheets?

15 A. It's an app.

16 Q. An app through what?

17 A. Through I have like a little
18 self-employed app that shows profit and loss. I
19 have it connected to the bank.

20 Q. Were you reviewing the bank records
21 to get that -- I'm trying to understand where you
22 got the information to input into the --

23 A. They come in electronically.

24 Q. Through QuickBooks or through bank
25 statements?

1 A. Through the app.

2 Q. Where --

3 A. I have a separate app.

4 Q. What app is that?

5 A. It's called a self-employed app.

6 Q. That's on your phone?

7 A. Yeah.

8 Q. So where is the self-employed app

9 pulling that information from?

10 A. The banks.

11 Q. Okay. So that app is connected to

12 your bank statements too?

13 A. Yeah.

14 Q. That's done separate from what the

15 bookkeepers were doing?

16 A. Yes.

17 Q. Now, do you still do that with the

18 controller Stacy?

19 A. Do what?

20 Q. Do that profit and loss app?

21 A. With Stacy?

22 Q. No, like with Stacy being the

23 controller, do you still use that profit and loss

24 app or does she handle that?

25 A. No, she's been -- she handles that

1 more now.

2 Q. So you don't use that app you
3 referred to anymore? No?

4 A. No.

5 Q. Now, how often does Stacy report to
6 you in terms of the overall, you know, state of, I
7 guess, Kingsway's finance -- internal finances?

8 A. She'll report to Rebecca.

9 Q. So how often does Rebecca report to
10 you regarding the overall state of Kingsway's
11 finances?

12 A. Once every couple weeks.

13 Q. Is that done in person or on the
14 phone?

15 A. On the phone.

16 Q. Are any documents submitted to you
17 from the director?

18 A. No.

19 Q. Now, in terms of your personal
20 finances in banking, do you handle that individually
21 or do you have somebody else that handles that on
22 your behalf?

23 A. From my personal banking?

24 Q. Yes.

25 A. Yeah, I handle it.

1 Q. You handle it?

2 A. Yeah.

3 Q. Actually, I just want to jump back.

4 Who is Janine Bookkeepers?

5 A. That's Alloy Silverstein.

6 Q. Is that their company name or is that

7 the Janine was the woman who was doing it for Alloy

8 Silverstein?

9 A. I believe it was JBL and then they

10 changed into Alloy Silverstein.

11 Q. Who at Alloy Silverstein did you work

12 with?

13 A. Who do you mean, who did I work with?

14 Q. I assume since that's a company, I

15 assume there was somebody at that company or

16 multiple people at that company that you work

17 directly with?

18 A. I don't recall who the person was.

19 Q. Now how much did you pay Alloy

20 Silverstein?

21 A. I guess it was, it was three or four

22 thousand.

23 Q. A year?

24 A. No, I think it was -- I don't recall.

25 I don't want to give you a wrong answer.

1 Q. Were they paid out of Kingsway's bank
2 account?

3 A. Yeah, I believe they would submit a
4 bill or -- I think, might have been paid by a credit
5 card. I think they were paid by the credit card.

6 Q. What company was the credit card
7 through?

8 A. Capital One.

9 Q. So you believe it was paid through a
10 Capital One credit card?

11 A. I think so, yeah.

12 MS. CIALINO: At this point, let's
13 take a quick five-minute break? Does that work?
14 And then we'll reconvene. Off the record.

15 (A brief recess is taken.)

16 CHAIRWOMAN BREWER: We are back on
17 the record. Ms. Cialino?

18 MS. CIALINO: Thank you, chair.

19 Q. Mr. DeSimone, I think I left off --

20 CHAIRWOMAN BREWER: Counsel, let me
21 just update the witness as well. We thought we'd go
22 at least another hour and just see where we are at
23 that point and make a decision of whether we need to
24 break for lunch or whether we are still within time
25 to wrap up. Okay?

1 MR. BROOKS: Thank you.

2 CHAIRWOMAN BREWER: Thank you,
3 counsel.

4 MS. CIALINO: Thank you, chair.

5 BY MS. CIALINO:

6 Q. I think where I left off is about
7 your personal finances in banking, and you said that
8 you do handle those; is that correct?

9 A. Yes.

10 Q. Is there anybody else besides you who
11 has access to your personal bank accounts?

12 A. No.

13 Q. Now, in terms of your wife, Michelle
14 DeSimone, do you handle her finances and banking?

15 A. No.

16 Q. So the two of you have a joint
17 account; is that correct?

18 A. Correct.

19 Q. Who, I guess, handles the finances on
20 behalf of the joint account that you have? Is it
21 just you or both of you?

22 A. Me.

23 Q. So she handles her own personal
24 account?

25 A. Yeah.

1 Q. And her company's accounts?

2 A. Yes.

3 Q. Now, who is your personal accountant?

4 A. Joseph Kornicki, but I want to expand
5 on that a little bit. So Joseph Kornicki is pulling
6 back his operation a little bit, so he has referred
7 us to the TAG Group, and coincidentally, it was
8 Duane Morris' accounting group, so they are both our
9 accountants right now.

10 Q. So Joseph Kornicki, how long has he
11 been your personal accountant?

12 A. I would say about five years.

13 Q. And you said he's pulling back his
14 operation, I think was your words. What do you mean
15 by that?

16 A. He's downsizing.

17 Q. So he referred you to what?

18 A. The TAG Group.

19 Q. TAG?

20 A. T-a-g.

21 Q. And you said that's under Duane
22 Morris?

23 A. Yes.

24 MR. BROOKS: It's a tax accounting
25 group.

1 MS. CIALINO: Okay.

2 Q. Do you use Duane Morris in addition
3 for the -- well, I guess moving on to them for your
4 accounting and attorneys, anything else you use
5 Duane Morris for?

6 A. Yes, we -- for being my attorneys
7 here.

8 Q. Anything outside that, besides
9 accounting and lawyers?

10 A. We're using them for the South Jersey
11 Treatment Management Company, so they are providing
12 that structure for us.

13 Q. Kind of as an advisor, would you say?

14 A. Yes.

15 Q. Now, I want to talk about in terms of
16 Joseph Kornicki, so he's still working as your
17 accountant, correct?

18 A. Correct.

19 Q. What services does he provide to you
20 personally?

21 A. Accounting services.

22 Q. By that, what do you mean? Does he
23 just do your taxes once a year?

24 A. Yes.

25 Q. Does he do anything else besides your

1 taxes once a year?

2 A. He handles -- he's been handling
3 business accounting.

4 Q. So he does your personal once a year
5 taxes and then he's also Kingsway's accountant?

6 A. Correct.

7 Q. How long has he been Kingsway's
8 accountant?

9 A. Since the beginning.

10 Q. So on behalf of Kingsway, what
11 services does he provide?

12 A. Doing the business accounting for
13 Kingsway.

14 Q. So the business accounting, what
15 falls under that as in taxes?

16 A. Taxes.

17 Q. Outside of doing the taxes, does he
18 do any other, you know, bookkeeping work, anything
19 else?

20 A. He will speak to the controller or he
21 will speak to Alloy Silverstein.

22 Q. What was Kornicki to speak to --
23 let's start with the controller Stacy. What does he
24 speak to her about?

25 A. I'm not sure.

1 Q. How do you know they speak?

2 A. They -- Kornicki told me he was
3 speaking to Stacy.

4 Q. Did he tell you what he was speaking
5 with Stacy about?

6 A. I guess it was tax, the taxes, the
7 QuickBooks.

8 Q. The Quick Books, okay. Does Joseph
9 Kornicki have access to your QuickBooks -- sorry, to
10 Kingsway's QuickBooks?

11 A. Yes.

12 Q. What does he -- what does that
13 entail, his access to Kingsway's QuickBooks? Does
14 he just use it for filling out the tax returns or
15 does he do anything else with it?

16 A. I believe it's for the tax returns.

17 Q. Okay. Now, in terms of Joseph
18 Kornicki speaking to Alloy Silverstein, what will he
19 speak to them about?

20 A. QuickBooks.

21 Q. In preparation for filing Kingsway's
22 tax returns or something else?

23 A. Yeah, for filing the tax returns.

24 Q. Now, in terms of your communication
25 with Joseph Kornicki in terms of him being your

1 personal accountant, how often do you communicate
2 with him?

3 A. I was communicating with him, I would
4 say, on a monthly basis, but now I haven't because
5 communicate with the tax accounting group.

6 Q. Currently, how often are you
7 communicating with the tax accounting group?

8 A. Once -- once every couple weeks.

9 Q. Now, when you used to communicate
10 with Joseph Kornicki on, let's say, approximately a
11 monthly basis, what would you talk to him about?

12 A. It was more preparation of taxes and,
13 you know, what was coming up.

14 Q. So would he advise you -- did he
15 provide you any advice, you know, on anything
16 outside of, you know, filing your tax returns, or
17 was it always about those tax returns?

18 A. It was more about the tax returns,
19 yeah.

20 Q. Now, how much, for your personal
21 accounting, how much did you pay Joseph Kornicki?
22 Was it a yearly amount? A monthly amount?

23 A. I believe monthly is what his bill
24 was.

25 Q. Do you recall how much it was a month

1 for his services?

2 A. I believe it's 1,250.

3 Q. That was for your personal
4 accounting?

5 A. I believe it was for both.

6 Q. 1,250 for Kingsway and for yourself.
7 What account did you pay him out of, if you recall?

8 A. I don't recall.

9 Q. Was he also your wife's accountant?

10 A. Yes.

11 Q. So the 1,250 a month was for
12 accounting for you, accounting for her and
13 accounting for Kingsway?

14 A. Um-hmm.

15 Q. Yes?

16 A. Yes.

17 Q. What about accounting for Graceway,
18 do you know if he did accounting on Graceway's
19 behalf?

20 A. I don't know.

21 Q. You don't know?

22 A. I believe so, I believe so.

23 Q. Did you have any written contract or
24 agreement with Joseph Kornicki?

25 A. I don't recall.

1 Q. Now, in terms of your -- Kingsway's
2 account and then your personal accounts, who handled
3 the transfers of money from Kingsway's account to
4 your personal accounts?

5 A. Me.

6 Q. Now, every time you made a transfer
7 of money, would you speak to anybody, you know,
8 prior to doing so?

9 A. I just spoke to Joe and we talked
10 about that I was going to transfer money.

11 Q. So every time you transferred money,
12 you would speak to Joseph Kornicki first?

13 A. Not every time, no.

14 Q. So like that once a month, when you
15 spoke to him once a month, you would talk about the
16 transfers you were going to make?

17 A. Yeah, when I spoke to him like -- let
18 me -- like when I said am I okay to transfer money,
19 he was like yeah, you can do your disbursements.
20 That's what he would tell me.

21 Q. That was the once-a-month type
22 conversation?

23 A. Yeah.

24 Q. What would you be asking -- why would
25 you be running it by him?

1 A. I -- because I wanted to make sure
2 that, you know, he knew that I was transferring
3 money from the business to personal.

4 Q. Okay. You wanted to make sure he
5 knew why?

6 A. Because he's my accountant.

7 Q. So you just thought it was something
8 that he should be aware of?

9 A. Yes.

10 Q. Would he ever tell you no, it's not
11 okay to transfer money?

12 A. No.

13 Q. So normally you ran by him what your
14 plans were and he would say fine?

15 A. Yes.

16 Q. Would you go into detail, you know,
17 or was it a more general conversation? Like, for
18 example, would you say, you know, I want to make
19 five transfers on this day to X account, two more to
20 Y account, or was it just like I've got a lot of
21 money in the Kingsway accounts, I want to move it to
22 personal accounts? I'm trying to get a sense of
23 your conversations.

24 A. No, it wasn't as specific, it wasn't
25 specific.

1 Q. Did you file personal tax returns in
2 the last five years?

3 A. Yes.

4 Q. What years were they filed?

5 A. In the last five years?

6 Q. Yes. Starting in 2018, did you file
7 in 2018?

8 A. Yes.

9 Q. Did you file in 2019?

10 A. Yes.

11 Q. Did you file in 2020?

12 A. Yes.

13 Q. What about year 2021?

14 A. Yes, I believe so.

15 Q. Were any of these tax returns, 2018,
16 2019, 2020 or 2021, at any point were any of them
17 amended?

18 A. I don't believe so.

19 Q. Now, prior to submitting these tax
20 returns, did you review them?

21 A. Not really, no.

22 Q. Did you sign them?

23 A. Yes.

24 Q. But you didn't -- you said not really
25 no, you didn't review them at all or a little bit?

1 A. Well, Joe would come up and say here
2 it is. Here's where you have to sign. I would look
3 at them and I would, you know, I would sign them.

4 Q. So you would review them?

5 A. I would review them briefly.

6 Q. Then you would sign that they are
7 true and correct?

8 A. Um-hmm, yes.

9 Q. What information would you give
10 Joseph Kornicki prior to filing your personal tax
11 returns?

12 A. Anything that I've had that came in
13 through the mail I would have a packet form and I'd
14 give it to him.

15 Q. Like what? What would come in
16 through the mail?

17 A. Anything like my W-2 or anything like
18 that.

19 Q. Do you remember any of the forms
20 other than your W-2?

21 A. Not really, no.

22 Q. Did you give him your bank
23 statements?

24 A. I'm not sure. I might have.

25 Q. Did you use QuickBooks for your own

1 personal banking?

2 A. No. It was -- no. It was -- no.

3 Q. So no QuickBooks. Are you familiar
4 with QuickBooks?

5 A. Not really.

6 Q. You've never used it yourself?

7 A. No.

8 Q. Did you file jointly with your wife
9 your tax returns?

10 A. Yes.

11 Q. So with Kingsway Recovery, in terms
12 of the tax returns filed, so did Kingsway file state
13 and federal tax returns in 2018?

14 A. Yes.

15 Q. What about 2019?

16 A. Yes.

17 Q. 2020?

18 A. Yes.

19 Q. 2021?

20 A. I believe so, yes.

21 Q. At any point were any of those
22 returns amended?

23 A. Not to my knowledge.

24 Q. Now, prior to filing Kingsway's tax
25 returns, did you sign them?

1 A. Yes.

2 Q. Did you review them prior to signing
3 them?

4 A. Yes.

5 Q. Now, in 2021, it would be Joseph
6 Kornicki who prepared the tax returns or would it
7 have been the Duane Morris --

8 A. TAG.

9 Q. Which one?

10 A. Duane Morris TAG.

11 Q. Duane Morris filed them in 2021?

12 A. Yes.

13 Q. And prepared them?

14 A. Prepared them, yes.

15 Q. 2020 was --

16 A. Kornicki.

17 Q. -- Kornicki, so your personal
18 returns, 2021, was that Duane Morris?

19 A. Yes.

20 Q. And 2020 and prior was Kornicki?

21 A. Yes.

22 Q. Now, for Kingsway specifically, what
23 tax returns -- sorry, what tax forms do you recall
24 were filed for 2021? What types of forms, Schedule
25 C, 1035, if you know?

1 A. I don't know.

2 Q. Prior to that, 2020, do you know what
3 tax forms were filed?

4 A. I don't know.

5 Q. Now, in terms of communicating with
6 Joseph Kornicki on -- relating to Kingsway
7 Recovery's accounting, how often would you
8 communicate with him, still once a month or a
9 different amount?

10 A. I would say once a month.

11 Q. What did you communicate with him
12 about approximately once a month?

13 A. Just about the tax account.

14 Q. And the transfers or no?

15 A. If I thought I should bring it up to
16 him, but not much.

17 Q. What would make you think you needed
18 to bring it up to him, for example?

19 A. If I told him how much I was bringing
20 over to my personal account.

21 Q. Okay.

22 A. But -- that's it.

23 Q. What would make you think it was
24 important, you know, this time you guys were
25 speaking to bring up the amount that you were

1 transferring over? Was there anything specific?

2 A. No.

3 Q. Now, did you file payroll tax returns
4 on behalf of Kingsway Recovery?

5 A. Umm, the -- I know the accountant
6 spoke to Stacy about the payroll tax returns and
7 director of HR.

8 Q. Do you know if they were filed?

9 A. I believe so, yes.

10 Q. Would you have signed those documents
11 too prior to them being filed?

12 A. Payroll? I do not remember signing.

13 Q. Now, what documents did you give,
14 let's start with Joseph Kornicki, in 2020, if you
15 remember, prior to him filling out Kingsway's tax
16 returns?

17 A. The documents I believe came from the
18 controller for all of the Kingsway was done -- he
19 got all the documents from there.

20 Q. But in 2020, do you know when those
21 were filed, the 2020 tax returns?

22 A. I'm not sure.

23 Q. At that point, do you know if you had
24 a controller at Kingsway?

25 A. Yes, I think I did, yeah.

1 Q. So prior to the controller being
2 there and providing the documents to the accountant,
3 who provided documents to the accountant for billing
4 on, let's say, your 2019 Kingsway tax returns?

5 A. We got -- I believe that was me. I
6 think I gave them everything.

7 Q. Do you remember what you gave them?

8 A. No.

9 Q. In -- for your -- for Kingsway's,
10 sorry, 2021 tax returns that were filed by the Tag
11 Group, what documents were given to TAG before they
12 prepared the income tax returns?

13 A. They got bank statements from us.

14 Q. Anything else that you recall?

15 A. Any paperwork that I had from like
16 the W-2s.

17 Q. What about QuickBooks, did they have
18 access to the QuickBooks?

19 A. Yes.

20 Q. Do you know if Joseph Kornicki, prior
21 to TAG, if Joseph Kornicki had access to QuickBooks
22 for Kingsway?

23 A. Yes.

24 Q. Was he like an authorized user or how
25 did that work?

1 A. I believe so.

2 Q. When you started Kingsway, I think
3 you had said earlier today that it was about
4 \$120,000; is that correct?

5 A. Um-hmm, yes.

6 Q. Where did the money come from to
7 start up Kingsway Recovery?

8 A. Me and my wife's work.

9 Q. So your savings?

10 A. Yes.

11 Q. Did you take out any loans to start
12 Kingsway Recovery?

13 A. No.

14 Q. Now, from looking at the bank
15 records, Kingsway Recovery's bank records, some
16 transfers from Kingsway Recovery's bank account to
17 your own personal bank account were coded as or
18 listed as, let's say, business loan repayments. Are
19 you aware of that?

20 A. Yes.

21 Q. Why were they coded or listed as
22 business loan repayments?

23 A. I think that was an unfortunate
24 error. They were clicked wrongly.

25 Q. Clicked wrongly where?

1 A. On, it was a mistake that was made.

2 It was a category mistake.

3 Q. So, I'm just trying to get a sense of
4 where you were clicking to make that mistake?

5 A. Something was categorized wrong.

6 Q. Right. So who was doing the
7 categorizing? Was that you?

8 A. I believe so.

9 Q. So categorized wrong where? Is it
10 when you are doing online banking? Was it in
11 QuickBooks? I'm trying to get a sense of where.

12 A. Somehow when, I guess, I went in,
13 because I don't know QuickBooks too well, when I
14 went in there, I must have categorized the -- a
15 business loan in there, and something must have been
16 going into the business loan, so...

17 Q. So why were you using QuickBooks and
18 doing that yourself versus, you know, your
19 bookkeeper?

20 A. Because I think I did that like as I
21 brought the bookkeeper on. Like, I think that's
22 when I was like -- they -- so when we did that, the
23 QuickBooks had it in there already, and they fixed
24 it.

25 Q. Okay. So you're saying that all the

1 coding of transfers as business loan repayments were
2 done prior to you bringing on the Alloy Silverstein
3 bookkeepers?

4 A. Yeah. There was a QuickBooks account
5 and they took it over.

6 Q. So who handled the QuickBooks
7 inputting prior to Alloy Silverstein?

8 A. It was new, like so we got it and
9 then handed it off to Alloy Silverstein.

10 Q. Okay. So you were doing the
11 QuickBooks inputting for a period of time?

12 A. Yeah, that's when I probably un -- I
13 checked the wrong box.

14 Q. So how long were you doing the
15 QuickBooks inputting on behalf of Kingsway?

16 A. Very short. It wasn't long at all.

17 Q. Do you remember about how long? A
18 couple months? A couple weeks? What are we talking
19 about?

20 A. Maybe couple months.

21 Q. Now do you recall how many transfers
22 you coded as business loan repayments?

23 A. No, I don't.

24 Q. So once the QuickBooks inputting went
25 over to Alloy Silverstein, were -- was that when the

1 issue was fixed with the business loan repayments?

2 A. Yes.

3 Q. How do you know it was fixed?

4 A. Umm, I think they reached out and
5 said something to me.

6 Q. Brought up that they saw it?

7 A. Yeah.

8 Q. And at that point it was fixed?

9 A. Yes, I believe so.

10 Q. So all the transfers that were listed
11 in the bank records as business loan repayments,
12 that was all done by mistake by you?

13 A. Um-hmm, yes.

14 Q. And, I mean, the number of transfers
15 that you did that way, do you have any idea or any
16 sense of how many you did?

17 A. No, no.

18 Q. Did -- would it surprise you if it
19 was over 50?

20 A. Was it?

21 Q. Would it surprise you if it was over
22 50 transfers coded as business loan repayments?

23 A. No, it wouldn't surprise me.

24 Q. Okay. That was all done in a couple
25 months' period?

1 A. Yeah, I'm not sure.

2 Q. Okay. Now, in terms of the \$15
3 million of insurance proceeds that Kingsway brought
4 in, from that money, did you purchase any
5 properties -- I'm sorry, did Kingsway purchase any
6 properties?

7 A. We purchased the -- are you talking
8 about Kingsway or --

9 Q. Yeah, out of Kingsway's business
10 account, banking account, did Kingsway purchase any
11 properties?

12 A. No, it was -- no.

13 Q. Kingsway didn't purchase 124
14 Bridgeton Pike in Mullica Hill?

15 A. I believe that was purchased out of
16 my personal account.

17 Q. So it was purchased -- your
18 understanding is it was purchased out of your
19 personal account, and then how did it work with D-28
20 Realty? D-28 Realty became the owner of the
21 property?

22 A. Yes. So Kingsway was leasing from
23 the owner of the property. I spoke to Joseph
24 Kornicki, and he said that we should open up D28,
25 start D28, and then we would, Kingsway would lease

1 from D28.

2 Q. Okay. Now prior to D28 purchasing
3 it, so it was owned by someone who was named Bruce
4 Clark?

5 A. Yes.

6 Q. When Bruce Clark owned the location,
7 do you recall how much Kingsway was paying in rent?

8 A. Around 2,000.

9 Q. Okay, per month?

10 A. Yes.

11 Q. Now after Kingsway or after D28
12 became the owner of the property that at that point
13 D28 leases it back to Kingsway, correct?

14 A. Right.

15 Q. How much money was Kingsway paying
16 D28 in rent payments?

17 A. I think it was three.

18 Q. Okay. Did that number change over at
19 any point?

20 A. I think so.

21 Q. To what, to \$4,000 a month?

22 A. Yes, yes, that's it.

23 Q. How did D28 determine the cost of
24 rent of that facility at 124 Bridgeton Pike?

25 A. There was a lot of upgrades in the

1 facility, flooring and stuff like that, so I
2 believe, I believe I came up with that with Joe
3 Kornicki.

4 Q. So Joe Kornicki, does he have any
5 experience in property management?

6 A. I'm not sure.

7 Q. But with him you guys came up with 3-
8 or \$4,000 a month for a lease to Kingsway, correct?

9 A. Correct.

10 Q. Now, what about 1225 North Broad
11 Street in West Deptford? I believe that's Renewed
12 Light's location?

13 A. Um-hmm.

14 Q. What account was that property
15 purchased out of?

16 A. My personal account.

17 Q. Now, the money in your personal bank
18 account, do you have any additional source of funds
19 other than Kingsway Recovery?

20 A. No.

21 Q. So what about in your joint bank
22 account with you and your wife, does -- does that
23 account, the joint account, have any other source of
24 funds other than Kingsway Recovery?

25 A. No.

1 Q. What about your wife's account, do
2 you know where the source of funds come from for her
3 own personal account?

4 A. Umm, can you repeat that question?

5 Q. So in your wife's personal account,
6 Michelle's personal account, where do the source of
7 funds, if you know, where do they come from?

8 A. They come from earned income.

9 Q. From her earned income?

10 A. From income, earned income from
11 our -- from the business, from Kingsway.

12 Q. Now, you're sure that Kingsway's
13 operating account or business account has never
14 purchased any property?

15 A. To my knowledge, no.

16 Q. Now, in terms of the sober living
17 homes that Graceway operates in Glassboro, do you
18 know what funds, what -- excuse me, what account
19 those sober living homes were purchased out of? 112
20 Dickinson Road, 312 West High Street, 314 West High
21 Street, 310 High Street, Unit 1, 310 West High, Unit
22 2, do you know what accounts those houses were
23 purchased out of?

24 A. Out of Michelle's personal account.

25 Q. Okay.

1 A. I believe.

2 Q. You believe? But you're not sure?

3 A. No, I believe though.

4 Q. Now, does Kingsway have any source of
5 funds other than insurance proceeds or self-pay
6 proceeds, I guess?

7 A. No.

8 Q. Now, in terms of transferring funds,
9 you said you transfer funds from Kingsway Recovery's
10 account to your personal account and Kingsway
11 Recovery's account to your joint account; is that
12 correct?

13 A. Yes.

14 Q. Do you transfer funds from Kingsway
15 Recovery's account to any other accounts, whether it
16 be your wife's account, Graceway's account?

17 A. No.

18 Q. Now, the transfers, do you transfer
19 money from your joint account to your wife's
20 personal account?

21 A. No.

22 Q. Does your wife transfer money, if you
23 know, from your joint account to her personal
24 account?

25 A. I believe so.

1 Q. Do you transfer money from your
2 personal account to your wife's account?

3 A. No.

4 Q. Now, with the part of the \$15 million
5 in insurance proceeds to Kingsway, did any of that
6 money fund Graceway Sober Living, if you know?

7 A. No.

8 Q. Do you know where the funds came from
9 for -- where the money came from to fund Graceway
10 Sober Living?

11 A. Well, I mean, I believe she -- they
12 collect rent over there, and I believe it came from
13 Michelle's personal funds.

14 Q. It comes from your understanding is
15 rent and Michelle's personal account? Yes?

16 A. Yes.

17 Q. Michelle's personal account is funded
18 only by your joint account, or does she have any
19 other source of income?

20 A. No, she doesn't have any other source
21 of income.

22 Q. Do you know how much rent Graceway is
23 actually able to collect?

24 A. No.

25 Q. Now, in terms of your personal

1 residence, what account was that purchased out of?

2 A. I believe that was my personal
3 account.

4 Q. Out of your personal account?

5 A. Um-hmm.

6 Q. Yes? Was that purchased with cash or
7 does that have a mortgage on it?

8 A. Cash.

9 Q. Any other properties that your
10 accounts have purchased that we've not discussed,
11 and let's say in the last five years I'm talking
12 about?

13 A. No.

14 Q. Did Kingsway Recovery ever purchase
15 any vehicles?

16 A. No.

17 Q. Not at any point since 2018?

18 A. No.

19 Q. Do you know if Kingsway's bank
20 account was used to purchase any vehicles at any
21 time?

22 A. No.

23 Q. Did Kingsway purchase any vehicles on
24 behalf of the transportation company owned by your
25 wife?

1 A. No.

2 Q. Did you pay off -- did you ever have
3 any student loans?

4 A. Yes.

5 Q. What account did you use to pay off
6 your student loans?

7 A. I believe it was the Kingsway
8 account.

9 Q. How much were your student loans, if
10 you recall?

11 A. 70 or 80,000.

12 Q. Now, in terms of other purchases from
13 the Kingsway account, did you buy food for clients
14 of Kingsway Recovery out of that account?

15 A. No.

16 Q. Did you use -- ever use the Kingsway
17 Recovery account for -- to purchase personal items
18 or personal goods, meaning items for you and/or your
19 wife?

20 A. I think I bought a watch out of the
21 account.

22 Q. Not anything else you can recall?

23 A. I can't recall anything else.

24 Q. Do you recall how much the watch was?

25 A. No.

1 Q. Now, in terms of the movement of the
2 funds from coming into Kingsway's account from the
3 insurance companies and self-pay clients and then
4 transferring them, you know, to your personal
5 account, your joint account, and then the money,
6 some of the money getting transferred to your wife's
7 account and then your wife transfers money to
8 Graceway Sober Living's account, if you know, why
9 were the transfers done in this manner?

10 A. There was no set manner.

11 Q. So what made, you know, your
12 transfers or at least some of the transfers
13 yourself, what made you transfer money in the way
14 that you were transferring that?

15 A. What do you mean by that?

16 Q. Why did you decide to do it that way?

17 A. It was under the advisement of my
18 accountant.

19 Q. So in terms of, you know, not
20 transferring money directly from Kingsway Recovery
21 directly into your wife's account, was that on
22 advice of your accountant?

23 A. No. I don't think -- no.

24 Q. So why did you not transfer money
25 directly from, you know, you're transferring money

1 to your account, to your joint account from
2 Kingsway, then the money is also going from the
3 joint account into your wife's account. Why not
4 transfer directly from Kingsway's account into your
5 wife's account?

6 A. There was no reason.

7 Q. So you just decided for no reason to
8 do it that way?

9 A. I -- I just transferred money into my
10 account, into my account, that was it.

11 Q. And then your wife transferred money
12 from the joint account into her account?

13 A. I believe so.

14 Q. I'm trying to get a sense if this was
15 on advice of your accountant or if this is just what
16 you chose?

17 A. No, my account knew that I was
18 transferring money from my account to the -- from
19 the Kingsway account to my personal account.

20 Q. Do you know if your wife spoke
21 directly with Joseph Kornicki?

22 A. No.

23 Q. She did not or you don't know?

24 A. Spoke about what?

25 Q. Just spoke to him about accounting?

1 A. Yeah, she did.

2 Q. So she had her own conversations
3 outside of yours and Joseph's conversations?

4 A. Yes.

5 Q. Now, through your background in the
6 mortgage industry or elsewhere, do you have
7 knowledge of federal banking regulations?

8 A. No.

9 Q. Are you familiar with something
10 called a currency transaction report or a CTR?

11 A. I am now.

12 Q. When did you become aware or
13 approximately when did you become aware of what a
14 currency transaction report was?

15 A. About a month ago.

16 Q. What's your understanding of what it
17 is now?

18 A. It is the bank, if something goes in
19 there over \$10,000, the bank puts a transaction
20 form.

21 Q. But prior to that, prior to a month
22 ago, you had no knowledge?

23 A. No.

24 Q. What about the term "structuring"?
25 Based on your financial background, are you familiar

1 with that term?

2 A. No.

3 Q. Now, I want to direct your attention
4 to what's been previously marked as AR-85 on the
5 screen, and this -- and I think you may have a copy
6 in front of you too if it's easier for you to see.
7 This is an example of some of the transfers that the
8 Commission found from Kingsway Recovery's bank
9 account to your personal and your joint bank
10 accounts. So as you can see, if you look at the
11 screen or the document in front of you, the -- there
12 were transactions that were made here, it looks like
13 \$9,000 increments on the same day or near
14 consecutive days at the beginning, 6/3/2019, another
15 one at 6/3/2019, 6/4/2019, 6/5/2019 and so forth
16 that's going into a joint account on the other
17 chart, 8/20/2019, 8/26/2019, 8/27/2019, 8/30/2019
18 and so forth all in the amounts of \$9,000.

19 Why -- can you tell me why the
20 transfers were done in this way?

21 A. I was trying to keep them uniform.
22 That's all. That was the only reason I really had.

23 Q. So what do you mean? Why did you
24 want to keep them uniform? What do you mean by
25 that?

1 A. It was \$9,000, so I just wanted to
2 keep -- that was what was in my mind, just keep
3 transferring \$9,000, but as you can see up there,
4 6/3, I transferred two \$9,000 amounts, and so that
5 would have initiated a transaction report. So I'm
6 just saying, that's just the way I was doing it.

7 Q. So your understanding today is that
8 that would --

9 A. Yeah, yes.

10 Q. Would create a currency transaction
11 report?

12 A. Yes.

13 Q. Why would you do, even if it's the
14 same day, that 6/3/2019, why do two transfers of
15 9,000, just because you were only transferring
16 9,000?

17 A. Umm, I guess I needed to pay for
18 expenses.

19 Q. Why not 18,000?

20 A. Because I was trying to keep it
21 uniform at 9,000.

22 Q. What made you come up with the number
23 9,000?

24 A. I don't recall.

25 Q. And at some point did you stop

1 transferring monies in the amount of 9,000? Did you
2 decide you didn't want to do that \$9,000 uniform
3 transfer anymore?

4 A. Yes.

5 Q. When was that?

6 A. I don't recall.

7 Q. Why did you make that change?

8 A. Because I was just -- I didn't think
9 that it made too much sense anymore.

10 Q. Did somebody advise you to make those
11 transfers in the \$9,000 increments, or you just
12 decided that on your own?

13 A. Decided that on my own.

14 Q. Did anyone advise you not to make
15 that \$9,000?

16 A. No.

17 Q. Were the transfers done in this
18 manner in the amount of \$9,000 in order to avoid
19 federal banking requirements?

20 A. No.

21 Q. I want to direct your attention to
22 Exhibit AR-85W, which is on the screen, and I
23 believe you have a copy in front of you. Now, these
24 are just a few of the transfers that the Commission
25 found from Kingsway's bank accounts into your

1 personal accounts. As you can see, if we look at
2 that first, I don't know, block, 7/29/20, 95,000,
3 7/30/20, 95,000, 8/3/20, 95,000, 8/5/20, 95,000, and
4 8/5/20 also 70,000. That was going to the joint
5 account and below that there's transfers in the
6 amount 95, one 97 going to your personal account.
7 Why were they done so in this manner of, you know,
8 on the same or near consecutive dates?

9 A. I don't recall.

10 Q. Was this typical of you to do
11 transfers like that on the same or near consecutive
12 days?

13 A. I don't recall.

14 Q. Do you remember if you had a
15 conversation with your accountant, Joseph Kornicki,
16 or anybody else about doing the transfers in this
17 manner?

18 A. I don't recall that.

19 Q. Did anyone advise you to make them in
20 that manner?

21 A. No.

22 Q. Were these, any of these transfers
23 done to avoid federal and state tax requirements?

24 A. No.

25 Q. Were any of the transfers that we

1 just discussed, whether it's these on AR-85W or any
2 transfers you've done in the past done so in a
3 manner to -- that would avoid detection of insurance
4 payments that came into Kingsway Recovery?

5 A. No.

6 MS. CIALINO: Commissioners, at this
7 point I'm going to pass back to you to see if you
8 have any questions before we move on.

9 CHAIRWOMAN BREWER: I do. I'm just
10 wondering what were these transfers for,
11 particularly AR-85V, if we could start there with
12 the \$9,000 transfers, what was it for?

13 THE WITNESS: Umm, just expenses that
14 we had, expenses for growing this business.

15 CHAIRWOMAN BREWER: When you say
16 "expenses," am I correct that these were transfers
17 to you?

18 THE WITNESS: They were transfers
19 from the business account to my personal account.

20 CHAIRWOMAN BREWER: Right. So what
21 are the expenses you're talking about?

22 THE WITNESS: I just had expenses
23 that I had to pay. I mean, I remember back then
24 there was expenses, so...

25 CHAIRWOMAN BREWER: When you say

1 "expenses," I just want to clarify. Are you talking
2 about personal expenses or business expenses?

3 THE WITNESS: Personal.

4 CHAIRWOMAN BREWER: So were you using
5 these as compensation?

6 THE WITNESS: Yes.

7 CHAIRWOMAN BREWER: Did you also draw
8 a salary, you said?

9 THE WITNESS: Yes.

10 CHAIRWOMAN BREWER: What was the
11 salary that you drew?

12 THE WITNESS: 65,000.

13 CHAIRWOMAN BREWER: Okay. My last
14 question is did you have an internal or external
15 auditor of your financial statements? Did you have
16 any internal employee that did auditing of your
17 financials for an external auditor that you hired?

18 THE WITNESS: No.

19 CHAIRWOMAN BREWER: That's all the
20 questions I have, counsel. No other commissioner
21 has questions.

22 MS. CIALINO: Okay.

23 BY MS. CIALINO:

24 Q. I want to move on at this point and
25 talk some about the services, back to the services

1 that Kingsway Recovery offered patients. In terms
2 of the individual counseling sessions that we talked
3 about at the beginning of this for partial care and
4 IOP clients, do you know if these sessions, you said
5 they were about 45 minutes; is that correct?

6 A. I believe so.

7 Q. Was it always 45 minutes or could
8 they be like could someone get an hour-and-a-half
9 session or is there like a set amount of time for
10 these individual sessions? How does it work?

11 A. I believe 45 was the standard.

12 Q. That's just standard in the industry?

13 A. Yeah, I believe so.

14 Q. Now, do you know if any of these
15 individual counseling sessions were ever cut short?

16 A. Kingsway files protocols, so all
17 therapists run their sessions to the full duration
18 of time, and the director of operations will
19 oversee -- oversees that.

20 Q. Did you ever receive reports at any
21 point, you know, since 2018 about individual
22 counseling sessions getting cut short?

23 A. No.

24 Q. Would it surprise you to hear that
25 staff members of Kingsway have stated that this was

1 a recurring practice of cutting these individual
2 sessions short?

3 A. Yeah, that would be a surprise.

4 Q. So it was never reported to you?

5 A. No.

6 Q. Now, if it was, let's say, a client
7 of Kingsway, a patient at Kingsway had a complaint
8 about the care they were receiving or the services
9 provided to them that they were receiving, where is
10 that complaint supposed to go? How is that supposed
11 to work?

12 A. Supposed to go to the clinical
13 director.

14 Q. What does the clinical director do
15 with it?

16 A. Would talk to the operational
17 director.

18 Q. And does it make its way up to you or
19 is it supposed to make its way up to you?

20 A. I don't know. I don't know that, but
21 I've never heard of that before, so...

22 Q. If a staff member, let's say a
23 clinician, had a complaint about, you know,
24 something they were being told to do, you know, as
25 part of their job, where would that complaint --

1 where was that complaint supposed to go?

2 A. Of a staff member?

3 Q. Yeah, like a clinician, let's say?

4 A. It would go to the clinical director.

5 Q. From there, where does the complaint
6 go from the clinical director? Is it documented
7 anywhere?

8 A. If there was a complaint, it should
9 have been, it should be documented, yes.

10 Q. What is done with that documented
11 complaint or what should be done with it?

12 A. I am not sure, but it would be
13 reported to the operations person.

14 Q. And then is it supposed to -- are you
15 supposed to be made aware of it?

16 A. There's no set thing that they have
17 to make me aware of it, but they might clue me in.

18 Q. Have you ever been made aware of any
19 complaints, not just about cutting therapy sessions
20 short, but any complaints from staff members,
21 Kingsway staff members, have you ever been made
22 personally aware?

23 A. No.

24 Q. What about back to client or patient
25 complaints, are those documented or are they

1 supposed to be documented?

2 A. They are documented.

3 Q. What's done with them after they are
4 documented?

5 A. They go to the clinical director.

6 Q. And then what are they filed
7 somewhere, or are they supposed to --

8 A. I'm not sure what the end result of
9 them is, but I don't know.

10 Q. Have you ever personally been made
11 aware of any patient complaints, any at all --

12 A. No.

13 Q. -- at Kingsway? Now in terms of when
14 the individual counseling sessions happen at
15 Kingsway, are they -- do they have it before group
16 session, in the middle of group session, after group
17 session, how does that work?

18 A. It would be before and after.

19 Q. So never during the middle of group
20 therapy?

21 A. No.

22 Q. So has Kingsway Recovery ever taken
23 clients out of group therapy in order to provide
24 them with individual counseling?

25 A. Not to my knowledge.

1 Q. What about case management services,
2 does Kingsway Recovery take clients out of group
3 therapy in order to provide these case management
4 services we talked about at the beginning?

5 A. No.

6 Q. When are the case management services
7 done or provided?

8 A. Before or after group.

9 Q. And how do you know that nobody was
10 ever taken out of group therapy for individual
11 sessions?

12 A. It was not brought to my attention.

13 Q. It has never been brought to your
14 attention?

15 A. No.

16 Q. Now, are there like schedules for --
17 does Kingsway have schedules for individual
18 patients, like you come in here today and at 10:00
19 a.m. you go to individual therapy, at 10:45 you
20 start group or anything like that? Is that
21 documented anywhere?

22 A. I'm not sure. I'm not sure how that
23 was done.

24 Q. Who would be in charge of documenting
25 it?

1 A. The --

2 Q. Or who would know?

3 A. The director of operations.

4 Q. Is that inputted into KIPU?

5 A. I don't think so. I'm not sure. I
6 don't know.

7 Q. Are like the times of group therapy
8 sessions and the times of individual therapy
9 sessions actually inputted into the electronic
10 medical records?

11 A. I believe so.

12 Q. What about nursing services, if a
13 client needs nursing services, are they taken out of
14 group therapy or when are those done?

15 A. Before or after group.

16 Q. And you've never -- no one's ever
17 told you that that's occurring during a group
18 therapy session?

19 A. No.

20 Q. Have you ever talked to your director
21 of operations, have you ever talked to your director
22 of operations about, you know, the timing of these
23 different services that Kingsway's offered, the
24 timing of them, whether it's -- when did they
25 happen? Do you get into the nitty-gritty of that?

1 A. No.

2 Q. Now, you said you watched the hearing
3 on or you were able to listen to the hearing on
4 October 11th, correct?

5 A. Yes.

6 Q. And in that there were allegations
7 that -- made by the SCI that we found that people
8 were being taken out of group therapy for individual
9 sessions and case management services and then at
10 the same time were being billed, the insurance
11 companies were being billed as if the service wasn't
12 overlapping but happened before or after.

13 After you heard that, did you talk to
14 your director of operations?

15 A. No.

16 Q. You didn't say is this actually
17 occurring or --

18 A. I didn't. I didn't see that part of
19 the hearing. I did not. I did not see that.

20 Q. So you have not talked to your
21 director of operations about that?

22 A. No.

23 Q. Now at Kingsway, if a client relapses
24 and needs to go back to detox, do you know if that
25 triggers a new period of insurance benefits in terms

1 of PHP or IOP? Would that event, relapse, would
2 that trigger more insurance payments?

3 A. Can you repeat the first part of
4 that?

5 Q. Let me step back. So -- and I assume
6 this is different for every insurance provider, but
7 let's say maybe typically how many days will an
8 insurance company cover PHP or partial -- I forget
9 what you refer to it as, partial care treatment?

10 A. Are you looking for like an average?

11 Q. Yeah, I know I'm sure they differ for
12 every company?

13 A. Okay, so let me explain it. So, I
14 mean, the insurance company might grant like a week
15 or two for partial care.

16 Q. Okay. And then after that, would the
17 insurance company pay for IOP?

18 A. Yes.

19 Q. Typically, again, I know it's going
20 to be different for every person and every
21 insurance, but typically about how long does the
22 insurance company cover IOP?

23 A. That could be like two weeks to maybe
24 five weeks, something like that.

25 Q. Okay. So let's say somebody does

1 their partial care, that time runs up in terms of
2 when the insurance will pay or that person is
3 progressing well and gets bumped out of IOP. Now,
4 if there is a relapse, at that point would the
5 insurance company then pay again starting with
6 partial care?

7 A. It depends.

8 Q. Can you explain like how that works?

9 A. So if -- it depends on the severity
10 of the relapse.

11 Q. What do you mean by that?

12 A. So if the person, let's say, smoked
13 marijuana and they were in partial care, it might
14 not trigger a detox, but if the person is doing
15 fentanyl or heroin, they would be sent out to a
16 detox.

17 Q. Okay. Then let's say the person
18 used, you know, an opioid and had to go back to
19 detox, then would that insurance company or
20 typically would that insurance company now start
21 from partial care, you know, week one, again?

22 A. Yeah, go to detox. They would have
23 their stay in detox and then the partial care.

24 Q. A relapse can trigger a new period of
25 insurance benefits?

1 A. Yes.

2 Q. How does Kingsway report clients'
3 progress, a client's progress to insurance
4 companies?

5 A. So our utilization review team uses
6 industry standards to assess the patient's condition
7 and neither exaggerates or downplays the condition
8 if they are -- the condition is as is.

9 Q. So they -- sorry, they use industry
10 standards to what?

11 A. To assess the condition of a client.

12 Q. What -- when you say industry
13 standards, what are you referring to?

14 A. Uh, the ASAM model.

15 Q. And how often, so what's actually
16 being reported? So the observations or is there --
17 what's being reported to the insurance company?

18 A. Clinicals.

19 Q. The clinical person's observations of
20 the patient or what?

21 A. The clinical review is given to the
22 insurance company.

23 Q. How often is that done?

24 A. When the client's review is due.

25 Q. So how often are those due? Is it

1 different for every insurance company?

2 A. Different for every insurance.

3 Q. Typically is it a once a week thing,
4 once a month thing?

5 A. Probably maybe biweekly would be a
6 good average there.

7 Q. So the clinical staff is the one
8 filling out that information that eventually makes
9 its way to the insurance company?

10 A. The utilization review team would
11 then -- so the clinical team puts everything into
12 the EMR system, and then the utilization review team
13 would report it to the insurance companies.

14 Q. Okay. Now the utilization review
15 team, currently who's on that?

16 A. Umm, you want names? Sharhonda is
17 our utilization review manager.

18 Q. And does she have other people
19 working under her?

20 A. Yeah, there's one other person.

21 Q. One other person?

22 A. Yeah.

23 Q. Who reviews the utilization? Does
24 anyone outside of Sharondha review the utilization
25 reviews before they go to the insurance companies?

1 A. I don't believe so.

2 Q. Have you ever look at utilization
3 reviews before they go out to insurance companies?

4 A. No.

5 Q. Never, never since 2018?

6 A. Not since we've been operating like
7 -- I've seen them before when we first started, yes.

8 Q. So when you first started?

9 A. When we first started, the ReliaBill
10 was doing the utilization reviews. I've never done
11 a utilization review, but I know that the ReliaBill
12 would do it, so the lady would send that stuff to
13 the -- would send the clinicals to the insurance
14 companies.

15 Q. Okay. So let's talk about ReliaBill.
16 ReliaBill was what? What kind of company is
17 ReliaBill?

18 A. They were a medical billing company.

19 Q. So when did Kingsway use them?

20 A. From the start.

21 Q. So 2018 until when?

22 A. '21.

23 Q. Are you sure on the 2021 date or is
24 it before that?

25 A. No, ReliaBill was used into '21.

1 Q. What were ReliaBill used for, medical
2 billing, so they did utilization reviews?

3 A. Yes.

4 Q. What else did they do?

5 A. Verification of benefits.

6 Q. Anything else?

7 A. I think that's it.

8 Q. Then how did you end up -- where is
9 ReliaBill out of?

10 A. They were out of Florida.

11 Q. How did you end up choosing to use
12 ReliaBill?

13 A. At a past job I heard of them. One
14 of my past employers was using it.

15 Q. Do you remember which one?

16 A. Yes, Victory Bay.

17 Q. Had you -- who at ReliaBill did you
18 work with or Kingsway work with? Who was the
19 account manager who handled everything coming out of
20 Kingsway?

21 A. I believe a guy named Carlton was the
22 main point of contact.

23 Q. Do you remember his last name?

24 A. No.

25 Q. Do you remember any other names of

1 people at ReliaBill that Kingsway worked with?

2 A. I'm sorry, I'm trying to remember the
3 names of anybody else. Jean, there was a Jean, but
4 I do not remember her last name.

5 Q. Janine?

6 A. Yeah.

7 Q. Did you communicate directly with
8 ReliaBill?

9 A. I communicated directly with Carlton
10 at ReliaBill.

11 Q. What did you communicate with Carlton
12 about?

13 A. Just the service, like how they were
14 doing. It was more like if they -- if I had a
15 question or something and I couldn't get through to
16 somebody, there was -- I would talk to Carlton about
17 it.

18 Q. What type of questions would you have
19 for ReliaBill?

20 A. I would just ask questions about
21 billing, how they did it. I was trying to learn.

22 Q. Why did you want to learn?

23 A. Just learn like what was going on,
24 because they kind of, with billing, with the big
25 billing teams like that, the national billing teams,

1 they kind of want to bill the dependents upon the
2 treatment center, so they don't communicate with me
3 that much, so, you know, I just wanted to learn a
4 little bit about it so I would call them and, you
5 know.

6 Q. How often would you speak to them?

7 A. Once every couple weeks.

8 Q. Would you review the work that
9 ReliaBill was doing?

10 A. No.

11 Q. Did you ever review when ReliaBill
12 was doing the utilization reviews, did you ever
13 review them?

14 A. No.

15 Q. Did anybody at Kingsway review
16 ReliaBill's work?

17 A. No.

18 Q. Now, in terms of the, I guess, let's
19 say, the reporting of a client's progress to health
20 insurance companies, was the reporting by clinicians
21 of a client's progress to your knowledge, was it
22 ever downplayed in order to make it look like the
23 client or the patient was doing worse than they
24 actually were?

25 A. No.

1 Q. Have you ever personally instructed
2 staff to downplay clients' progress in reports in
3 KIPU?

4 A. No.

5 Q. What about your wife, has she ever
6 done so?

7 A. No.

8 Q. How do you know that?

9 A. I know we wouldn't -- never do
10 something like that.

11 Q. Do you know if your wife has ever
12 instructed staff on how to fill out utilization
13 reviews to insurance companies?

14 A. No.

15 Q. Has your wife ever been present at
16 any Kingsway staff meetings?

17 A. No.

18 Q. Has your wife ever been present at
19 the Kingsway offices, administrative offices?

20 A. I think she, she came by before.

21 Q. Just here and there or was it
22 regularly?

23 A. Here and there to say hi.

24 Q. How often does Kingsway Recovery
25 collect urine samples from clients to determine if

1 they relapsed?

2 A. I believe it's once, I believe it's
3 weekly.

4 Q. Who determined that it be done
5 weekly?

6 A. The clinical director.

7 Q. Has it always been weekly or at any
8 point since Kingsway's been open was it more than,
9 done on more than a weekly basis?

10 A. I believe that's been the standard.

11 Q. Now what lab is Kingsway currently
12 use?

13 A. SDX.

14 Q. Where is SDX out of?

15 A. I'm not sure where they are out of,
16 but I think it's New Jersey.

17 Q. How long have you used SDX?

18 A. I think about -- I think it's over a
19 year.

20 Q. And prior to SDX, who did you use?

21 A. Ammon.

22 Q. Ammon Labs is located in New Jersey?

23 A. Yes.

24 Q. Any other labs that Kingsway has ever
25 used?

1 A. No.

2 Q. What about a lab called Gene Tox
3 Worldwide doing business as Scientia?

4 A. That's SDX.

5 Q. Is it correct that they are known as
6 Scientia?

7 A. I think so.

8 Q. Who chose what lab Kingsway uses?

9 A. The clinical director.

10 Q. So who chose to use Scientia? Who
11 was clinical director at the time?

12 A. Jessica Mercier.

13 Q. Was there any contract that Kingsway
14 has with Scientia or SDX as you refer to them as?

15 A. I believe so.

16 Q. Did you review that contract opinion
17 point?

18 A. The clinical, Jessica, clinical
19 director.

20 Q. Did you sign any documents between
21 Kingsway and SDX?

22 A. I do not recall.

23 Q. So did Jessica Mercier discuss the
24 choosing of Scientia or SDX prior to Kingsway
25 entering into contract with them?

1 A. Yes, she said that she was
2 recommending them.

3 Q. And did you do any -- did you look
4 into them? Did you ask around to see if they were a
5 legitimate company or did you do any background or
6 did you ask her?

7 A. I asked her, who is this lab. She
8 said I looked into it, they looked reputable.
9 They -- they are in the state, so they are close by.
10 And she -- I think she went through like three or
11 four different labs and they picked that one.

12 Q. Prior to them using Ammon Labs, why
13 did you switch from Ammon Labs or Scientia?

14 A. Ammon Labs, Ammon Labs called us up
15 and said at one point that they were leaving, we
16 were not going to be working with them anymore.
17 They were moving more into the Medicaid space and
18 they didn't want to do private care.

19 Q. Now when you worked with Ammon Labs,
20 what services did it provide to Kingsway?

21 A. Ammon Labs, they had a tech who would
22 monitor and supervise the urines.

23 Q. The tech monitors and supervises.
24 What do you mean? Does the tech come out and take
25 the urines from the patients at Kingsway? Who

1 collects the urines?

2 A. The lab.

3 Q. You said that was done on a weekly
4 basis?

5 A. Yes.

6 Q. Then the lab takes the urine and
7 tests it, correct, at their own facility?

8 A. Yes.

9 Q. How are the results reported back to
10 you?

11 A. Through a portal.

12 Q. Does it go directly into the KIPU
13 system?

14 A. I believe so.

15 Q. Did you ever review any lab results
16 from patients at Kingsway?

17 A. No.

18 Q. Who was in charge of reviewing lab
19 results?

20 A. That would be the clinical director
21 or the nursing staff.

22 Q. So in addition to the weekly urine
23 samples that are taken from patients, is there any
24 other instance when a patient at Kingsway would have
25 to submit a urine?

1 A. If there was under suspicion, if
2 there was a suspicion.

3 Q. Let's say somebody comes in to
4 Kingsway and people believe them to be under the
5 influence of whatever, let's say a narcotic. Who
6 takes the urine sample at that point?

7 A. The lab tech.

8 Q. The lab tech gets called out?

9 A. No, they are there. They work there.

10 Q. So Ammon Labs had a full-time lab
11 tech working at Kingsway?

12 A. Correct.

13 Q. What was the person's name?

14 A. I don't remember. There was multiple
15 people there.

16 Q. That were at Kingsway full time to
17 take urine samples once a week?

18 A. I remember that there was -- there
19 was people there in the day and at night.

20 Q. Okay. Every single day?

21 A. Yes.

22 Q. Okay. Was that in the contract with
23 Ammon Labs?

24 A. Yes, I believe so.

25 Q. What about Scientia?

1 A. Yes.

2 Q. Did they have somebody there every
3 day and every night?

4 A. Yes.

5 Q. Okay. Now who pays that person?

6 A. Them.

7 Q. Did you have to -- Kingsway have to
8 pay Ammon Labs for these services?

9 A. No.

10 Q. So they are just -- they are just
11 there on a daily basis?

12 A. Yeah. The lab will take this, the
13 urine sample, and bill the insurance company.

14 Q. Right. Okay.

15 A. That's how it is.

16 Q. I'm trying to make sure I understand
17 that Kingsway does not have to pay the lab to have
18 one of the lab's employees on site 24 hour morning
19 and night?

20 A. No.

21 Q. Kingsway employees, did they have
22 any, you know, job in assisting with the urine
23 collection?

24 A. No. It was the lab who did the
25 collection.

1 Q. Is there a Kingsway employee that
2 would oversee the lab tech who was on premises?

3 A. No.

4 Q. So when urines were taken, it was
5 only the lab employee who was present? No Kingsway
6 employees would be present at the same time?

7 A. I mean, there was Kingsway employees
8 around in the facility, but the lab tech would be
9 supervising it.

10 Q. The urine collection?

11 A. Yes.

12 Q. So no Kingsway employees in addition
13 to the lab tech is what I'm trying to get at?

14 A. No.

15 Q. Now, has Kingsway ever falsified
16 urine samples in order to report to the client's
17 health insurance that the individual is still using
18 and in need of additional addiction treatment?

19 A. No.

20 Q. How do you know this hasn't happened?

21 A. It wouldn't happen if there's --
22 there's no way that that would happen.

23 Q. Why? How do you know that?

24 A. I mean, the lab tech is there, so --
25 and I can't believe that that would ever happen.

1 Q. So you -- I'm sorry, I don't mean to
2 repeat myself. You don't know the name of the lab
3 tech from Ammon Labs or you do?

4 A. No, I don't remember the name of the
5 lab techs from Ammon Labs.

6 Q. What about the current lab tech from
7 Scientia, do you remember the names?

8 A. I can't, I forget his name, but I can
9 get that.

10 Q. Off the top of your head you don't
11 recall --

12 A. Correct.

13 Q. -- now?

14 MS. CIALINO: Before we move on, do
15 the commissioners have any questions based on that?

16 CHAIRWOMAN BREWER: No questions.

17 Thank you. Do we want to do a check-in at least of
18 whether we think we need to break or --

19 MS. CIALINO: Off the record?

20 CHAIRWOMAN BREWER: We're just going
21 to go off the record for a moment.

22 (A discussion takes place off the
23 record.)

24 CHAIRWOMAN BREWER: We believe we are
25 going to be able to finish in less than an hour, and

1 it's my understanding that you are opting to
2 continue on as opposed to a lunch break at this
3 point?

4 THE WITNESS: That's correct.

5 CHAIRWOMAN BREWER: Wonderful.
6 Counsel?

7 MS. CIALINO: Thank you, chair.

8 BY MS. CIALINO:

9 Q. Now, I just have a few questions
10 about a service agreement that Kingsway had with
11 Ammon Analytical Labs. The agreement indicates that
12 services provided is that includes that Ammon Labs
13 would provide Kingsway Recovery with collection
14 supplies, shipping containers, and certified
15 phlebotomist/specimen collectors. Why was Ammon
16 Labs providing Kingsway Recovery with these items if
17 Ammon Labs was the one doing the collection of
18 urine?

19 A. Umm, that -- I thought that was part
20 of the service that they provided.

21 Q. What was?

22 A. The -- I guess the materials that
23 they brought in, that's what I thought it was for.

24 Q. But they weren't -- they were
25 providing them to Kingsway or they were just doing

1 it themselves? I'm just trying to make sure I
2 understand. I'm just trying to make sure I
3 understand whether the service agreement is versus
4 what was happening?

5 A. Yeah, I'm a little bit confused by
6 that question.

7 Q. Okay, but your recollection is that
8 Ammon had a person there to collect the urines and,
9 you know, to take them back, not ship them, but to
10 take them back to Ammon Laboratories from Kingsway?

11 A. Correct.

12 Q. Now, also it says responsibilities,
13 referring to the same service agreement,
14 responsibilities for Kingsway Recovery include
15 Kingsway Recovery must send to Ammon Analytical
16 Laboratories specimens with A, test requisition
17 forms, and B, billing contact information. Did
18 Kingsway Recovery send specimens to Ammon Labs?

19 A. Yes.

20 Q. Or were they brought -- I'm trying
21 to -- were they sent or were they taken by Ammon
22 Labs?

23 A. No, they were taken by -- like Ammon
24 Labs, they would do the specimen there at the
25 facility, and then they would take them to their

1 facility.

2 Q. Okay. Do you remember signing a
3 contract with Ammon Labs back in 2018, November 1,
4 2018?

5 A. Vaguely.

6 Q. Do you have a similar contract with,
7 currently with Scientia Diagnostic or SDX?

8 A. We -- we do have something here, I
9 believe. Yes.

10 Q. You do have a contract?

11 A. Yes.

12 Q. Okay. It looks like at SDX they
13 provide somebody on site, Jean Amestica; is that
14 correct?

15 A. Yes.

16 Q. Scientia -- and she's on site it
17 looks like Monday through Thursday, 10:00 a.m. to
18 8:00 p.m. and Friday 10:00 a.m. to 1:00 p.m. Are
19 you familiar with Jean?

20 A. I've seen her before, yeah.

21 Q. Jean --

22 A. We also have this for the record too.

23 Q. Okay. Now for Scientia currently,
24 does Kingsway staff collect urine of female clients?

25 A. So if a female client is there and

1 Jean is there, so the lab would get a female
2 counselor to monitor the urine, but they will
3 supervise that, you know, that process.

4 Q. I just want to be clear, who's
5 supervising the process of collecting urine from
6 female patients at Kingsway currently, the SDX rep
7 or is it the Kingsway employee?

8 A. Let me explain this to you. The SDX
9 rep will supervise the urine collection, but there
10 will be a monitor that would go in the bathroom with
11 the client, if it was a female, because Jean is a
12 male.

13 Q. Okay. Have you been present at
14 Kingsway's facility when any of this urine
15 collection occurred?

16 A. No.

17 Q. Now --

18 A. We have something here from SDX we'd
19 like to put in the record too.

20 Q. Yeah, your counsel has provided it to
21 us. It's a letter from SDX from Christopher
22 Williams about the how SDX collects urine from
23 Kingsway Recovery. That's just -- that's what we
24 just discussed, Jean, a male, is there from 10:00
25 a.m. to 1:00 p.m. -- 1:00 p.m. on Friday and 10:00

1 a.m. to 8:00 p.m. Monday through Thursday?

2 A. We have something here, if you want
3 me to read it or you want me to put it in the
4 record.

5 Q. We have it which has been put into
6 evidence.

7 Now I want to talk a little bit about
8 Graceway Sober Living. Do you know how many sober
9 homes Graceway Sober Living currently owns?

10 A. Several.

11 Q. Do you know the exact number?

12 A. No.

13 Q. What's the relationship between
14 Kingsway Recovery and Graceway Sober Living?

15 A. The relationship is that Kingsway
16 refers clients to Graceway Sober Living.

17 Q. Does Graceway Sober Living refer
18 clients to Kingsway Recovery?

19 A. No.

20 Q. What percentage would you say
21 approximately, I know this is going to be
22 approximate, of Kingsway Recovery clients reside at
23 Graceway Sober Living?

24 A. We don't check that information.

25 Q. Now, clients of Kingsway that are

1 staying at Graceway Sober Living, are they
2 transported to Kingsway Recovery or treatment?

3 A. I believe so.

4 Q. Who transports them?

5 A. I believe it's that other, the Favor
6 En Route transport company.

7 Q. Now, you said -- I just want -- you
8 said Kingsway Recovery refers clients to Graceway
9 Sober Living. Does Kingsway Recovery refer clients
10 to other sober living homes other than Graceway?

11 A. Does Kingsway? Kingsway refers
12 clients to multiple sober living homes.

13 Q. What other sober living homes?

14 A. Diane's House, Amy's House, other
15 Oxford Houses.

16 Q. Where is Amy's House?

17 A. West Deptford.

18 Q. And you said Andy's House?

19 A. Amy's House.

20 Q. Where is that?

21 A. In West Deptford. There's a Shoova
22 House in Mullica Hill.

23 Q. Who runs Diane's House?

24 A. I'm not sure.

25 Q. Who runs Amy's House?

1 A. I don't know.

2 Q. How about Shoova House, who runs it?

3 A. I don't know.

4 Q. Where is that located?

5 A. Shoova is in Mullica Hill.

6 Q. Any others? Oxford Homes you said?

7 A. Yes.

8 Q. What determines, you know, how are

9 these referrals done? Who makes them?

10 A. So you want me to explain that

11 process to you?

12 Q. Yes.

13 A. So a client would call in the

14 admission line and the person in the admissions

15 would, you know, see if they have any need for sober

16 living, and they would give them three different

17 sober living homes to choose.

18 Q. Does Diane's House transport

19 patients, Kingsway's patients, the ones who are

20 attending Kingsway to the facility every day?

21 A. I don't know.

22 Q. What about Amy's House?

23 A. I don't know.

24 Q. What about Shoova House?

25 A. I don't know.

1 Q. What about the Oxford Homes, do they
2 provide transportation?

3 A. I don't know.

4 Q. Do you have any role at Graceway
5 Sober Living?

6 A. No.

7 Q. Have any Kingsway employees ever
8 volunteered for Graceway Sober Living?

9 A. No.

10 Q. How do you know that?

11 A. Because Kingsway employees don't go
12 work in there.

13 Q. Would they be allowed to volunteer
14 over there, in a hypothetical?

15 A. No.

16 Q. Why not?

17 A. Because they are separate companies.

18 Q. Could Kingsway Recovery employees
19 volunteer at -- you know, for other jobs? Are they
20 not allowed to work at other places?

21 A. No, they can, yeah.

22 Q. So -- but you're just saying no
23 Kingsway employees have ever volunteered at
24 Graceway?

25 A. Not to my knowledge.

1 Q. Have Kingsway employees ever driven
2 the vehicles that the trans -- your wife's
3 transportation company operates?

4 A. No.

5 Q. Do you know if every resident who
6 lived at Graceway Sober Living attends Kingsway
7 Recovery for treatment?

8 A. I believe they -- I think they go to
9 other treatment centers.

10 Q. Do you know that or are you -- do you
11 think that?

12 A. I believe that, that they go to
13 other.

14 Q. Why do you believe that?

15 A. I just heard it mentioned.

16 Q. Where else? Do you know where else
17 Graceway clients, I guess, where else they go to
18 treatment at?

19 A. No.

20 Q. Have you ever seen a client list from
21 Graceway?

22 A. No.

23 Q. Have you ever attended a Graceway
24 staff meeting?

25 A. No.

1 Q. Now, if a Kingsway client or Kingsway
2 patient, if their insurance runs out and they can no
3 longer afford to continue to stay at Kingsway, what
4 services, if any, does Kingsway offer them?

5 A. Can you repeat that one more time?

6 Q. Let's say someone's insurance runs at
7 Kingsway and they can't afford to stay any longer,
8 does Kingsway provide them any services to help
9 integrate them back into the community or what
10 happens at that point?

11 A. So Kingsway would give them like a
12 non-pay extension, and the staff would then look for
13 aftercare options for them.

14 Q. Is a non-pay extension given in every
15 instance?

16 A. I'm not sure.

17 Q. Who makes that determination?

18 A. The director of operations.

19 Q. So the director of operations herself
20 makes it or is it recommended by the clinical staff?

21 A. I believe it's -- there's a
22 collaboration. She would definitely collaborate
23 with them on that.

24 Q. Are you made aware that someone is
25 offered this?

1 A. No.

2 Q. Now, do you know if any patients at
3 Kingsway whose insurance has run out so they are no
4 longer going to attend Kingsway, were there any
5 free, let's call it scholarship or time at Kingsway
6 ended, do you know if they have continued to reside
7 at Graceway?

8 A. I don't.

9 Q. You don't know?

10 A. No.

11 Q. Do you know if Graceway provides food
12 for their sober living residents?

13 A. I don't know.

14 Q. Now, before I switch gears here,
15 Commissioner, do you have any questions based on
16 that?

17 CHAIRWOMAN BREWER: None from me.
18 Commissioner Reina? No questions.

19 Q. Now, we talked a little bit about
20 ReliaBill. Now, since Kingsway opened in 2018, have
21 they been the only entity responsible for billing
22 health insurance companies?

23 A. No. We employed UB Solutions to help
24 us.

25 Q. So UB Solutions, what was their role?

1 A. Their role was to oversee our billing
2 practices. We have a letter from them.

3 Q. Okay. Do you currently use UB?

4 A. Yes.

5 Q. So they oversee your -- the billing
6 department at Kingsway?

7 A. Yeah.

8 Q. Now, Kingsway, who works at
9 Kingsway's billing department currently?

10 A. Rebecca, the operations director, is
11 in charge of the billing team.

12 Q. So is Rebecca in charge of basically
13 every department within Kingsway?

14 A. Yes.

15 Q. So she's -- Rebecca, what's her last
16 name again?

17 A. Pera.

18 Q. So she's in charge of the billing
19 department. Who else works in the billing
20 department?

21 A. I'm not sure of the names.

22 Q. How many employees work in the
23 billing department?

24 A. I'm not sure. I can guess.

25 Q. I don't need you to guess. I mean,

1 I'm trying to get a sense. More than five? Less
2 than five?

3 A. Less than five.

4 Q. Now, at some point you said, I think
5 you said in 2021 you stopped using ReliaBill?

6 A. Um-hmm, yes.

7 Q. Why did you stop using ReliaBill?

8 A. We stopped using ReliaBill because of
9 the communication problems that we were having.

10 Q. Can you explain in a little more
11 detail what communication problems you were having?

12 A. If we had a question regarding
13 billing or anything, they really wouldn't answer,
14 so...

15 Q. What questions would you have?

16 A. They were general questions.

17 Q. Those were your own personal
18 questions or questions as to hey, we're not getting
19 enough money from these, you know, claims that --
20 what type of questions?

21 A. No, just how, you know, how they were
22 billing, billing them out, how they were working.
23 You know, who was working on our account, who was
24 doing the AR, who was doing the billing. It was
25 hard to gauge them.

1 Q. Were you having issues with accounts
2 receivable?

3 A. No, not really.

4 Q. Were you having issues of getting,
5 you know, the full amounts that you believed
6 insurance companies owed to Kingsway?

7 A. No.

8 Q. So no issues in the actual
9 performance of the work ReliaBill was doing?

10 A. No. It was more of they were not
11 communicating with us.

12 Q. How much did you pay ReliaBill? Was
13 it a monthly fee or yearly fee?

14 A. It was a monthly fee.

15 Q. Do you know about how much that was?

16 A. It was -- it varied, because it was
17 based on a percentage.

18 Q. Percentage of what?

19 A. The gross revenue that they brought
20 in. So when we sign the contract, you know, I've
21 never done billing before, when we sign a contract
22 with ReliaBill, they gave us like a percentage that
23 they would take. That's how the contract was
24 stated.

25 Q. What percentage was that?

1 A. I believe it was like 7 percent.

2 Q. So typically, again, I'm sure it
3 varied per month, typically how much money were you
4 paying ReliaBill in a month?

5 A. Maybe 20, 25,000.

6 Q. To bill -- actually bill the
7 insurance companies, did ReliaBill have access to
8 the EMR system, KIPU?

9 A. Yes.

10 Q. And what do you know or if you know,
11 what did they look at inside KIPU to fill out their
12 claims?

13 A. I at that -- that I did not know.

14 Q. At some point did you bring your
15 billing in-house?

16 A. Yes.

17 Q. And you said that was in 2021?

18 A. Yes.

19 Q. Did you have a contract with
20 ReliaBill?

21 A. Yes.

22 Q. That was signed by you?

23 A. Yes.

24 Q. Was that something that was -- you
25 had to re-sign every year, or was that like you

1 signed it in 2018 and it was good until you fired
2 them essentially?

3 A. I believe I signed -- it was weird.
4 I signed like two contracts with them, but I'm not
5 -- I don't remember how they were set up. I don't
6 remember.

7 Q. Did you retain those contracts?

8 A. Do I have them?

9 Q. Yes.

10 A. Umm --

11 Q. Not with you, I mean did you retain
12 them?

13 A. Yeah, I think so.

14 Q. So when you brought the billing
15 in-house, how did you set that up? How did you make
16 that transition from an outside company to in-house?

17 A. That's why UB Solutions was in charge
18 of getting that set up, help us, after we made the
19 transition from ReliaBill to our in-house billing.

20 Q. So you brought on UB Solutions to
21 help make that transition?

22 A. Yes.

23 Q. Who was in charge of training
24 Kingsway's employees on how to bill insurance
25 companies?

1 A. They were.

2 Q. "They" meaning?

3 A. They helped training, but we had
4 brought in people that were experienced in that
5 regard.

6 Q. Okay. Now, what was your role in
7 overseeing UB Solutions at Kingsway with the work
8 they were doing at Kingsway?

9 A. I would just speak to them on how
10 the, you know, how everything was going.

11 Q. How often would you speak to somebody
12 at UB Solutions?

13 A. Maybe once a week.

14 Q. Who at UB Solutions would you speak
15 to?

16 A. Tiffany.

17 Q. Tiffany what?

18 A. Madden.

19 Q. Did any other UB Solutions employees
20 work on Kingsway's billing?

21 A. I think so.

22 Q. Do you recall their names?

23 A. There was one other person that was
24 helping with the transition. Off the top of my
25 head, I cannot remember her name right now.

1 Q. Was it Rebecca Profitt?

2 A. Yes, that's it.

3 Q. Now Tiffany Madden you said was the
4 other name?

5 A. Yes.

6 Q. How often was Tiffany Madden on site
7 at Kingsway's administrative offices?

8 A. She wasn't on site. It was Rebecca
9 Profitt that was on.

10 Q. So what was -- so Rebecca Profitt's
11 on site. What was she doing on site?

12 A. Talking to the employees about how
13 they were setting up and how they were moving into
14 their -- into the billing, the in-house billing.

15 Q. So was Rebecca Profitt doing the
16 training?

17 A. Yes, she was helping out with the
18 training, yes.

19 Q. Who was working at the time when the
20 transition was being made to in-house, who were the
21 Kingsway employees working on billing?

22 A. There was the biller. There was
23 Monica. There was Vanessa, and Lynn.

24 Q. Monica, do you know her last name?

25 A. I can't remember it off the top of my

1 head.

2 Q. What about Vanessa?

3 A. I believe her last name was Samuels.

4 Q. And then you said somebody else?

5 A. Lynn.

6 Q. Lynn, do you remember her last name?

7 A. Dalbow.

8 Q. Do any of those employees still work
9 at Kingsway?

10 A. Lynn.

11 Q. Lynn still does billing at Kingsway?

12 A. Yes, she does accounts receivable.

13 Q. Why did you decide -- not why. I
14 guess how did you make the decision to hire UB
15 Solutions over other companies that provide the same
16 work?

17 A. They are experienced, 25 years in the
18 business. They were local. They weren't a big
19 billing company, so that made me very happy.

20 Q. You're saying it was your
21 understanding the company's been around for 25
22 years?

23 A. They had 25 years' experience in
24 billing, UB Solutions.

25 Q. So when you say that Tiffany

1 Madden -- do you know, did she work in billing
2 prior?

3 A. I'm not sure how her structure was.
4 I know there was 25, she told me it was 25 years.

5 Q. That's what she told you?

6 A. And she seemed very knowledgeable.

7 Q. What about Rebecca Profitt who was on
8 site, what was her background?

9 A. Same, same type of background.

10 Q. Background in?

11 A. Like 25 years' experience, very
12 knowledgeable seemed like, was teaching our billing
13 team many different things, so...

14 Q. Did you witness her teaching the
15 billing team?

16 A. Just, I would talk to her and then
17 she would go and work with billing.

18 Q. Now, is UB Solutions still performing
19 work on behalf of Kingsway?

20 A. Yes, they are still consulting with
21 us.

22 Q. So consulting, what are we talking,
23 how often?

24 A. Whenever the billing team has a
25 question or anything.

1 Q. How many hours?

2 A. They would call them. Director of
3 operations will reach out to UB Solutions.

4 Q. Now, does Kingsway pay UB Solutions
5 on an hourly -- for an hourly rate?

6 A. No, I believe it's a flat rate
7 monthly.

8 Q. How much?

9 A. I think it's \$2,000.

10 Q. How often, you know, currently is
11 Kingsway's billing department reaching out to UB
12 Solutions?

13 A. I don't know, but I can probably get
14 you that information.

15 Q. So 2,000 a month, that's been going
16 on since 2021 or has that amount changed?

17 A. It was more before. When they were
18 doing the transition, it was much more.

19 Q. Now, at any point did Rebecca or
20 somebody else from UB, you know, reach out to you
21 and let you know, you know, what they found from
22 looking at the billing practices or anything like
23 that?

24 A. Well, we have the letter here what
25 they stated.

1 Q. But at any point, you know, prior?

2 A. Umm, I think Tiffany, Tiffany reached
3 out to me and she said that there was nothing done
4 that was anything wrong, but they were a little bit
5 disorganized. I think that's what her words were.

6 Q. Was they being disorganized, was that
7 ReliaBill?

8 A. ReliaBill, yeah.

9 Q. Did you have any conversations with
10 Rebecca Profitt about the way that the billing had
11 been done by ReliaBill?

12 A. No.

13 Q. Now I want to direct your attention
14 to what I'm going to mark as AR-88. It's on the
15 screen and I believe you have a copy too in front of
16 you which was provided to us yesterday. This
17 appears to be from the UB Solutions on the top and
18 it looks like it is written from UB Solutions, LLC
19 and Tiffany Madden's name is written at the bottom
20 of that. It's a document you received from where?

21 A. It's a document I received from
22 Tiffany.

23 (Exhibit AR-88, UB Solutions document,
24 is received and marked for identification.)

25 Q. Looks like it's undated. When was

1 this document received?

2 A. I'm not sure.

3 Q. Why did you receive this document?

4 Did you request it?

5 A. Yes.

6 Q. Why did you request it?

7 A. We wanted to see, we just wanted to
8 get something from them about the billing.

9 Q. Looks like, as I'm read the document
10 in front of you, it says, "This contract was
11 initiated to assist with unresolved billing concerns
12 from the time period of January 2020 through
13 February 2021. These concerns are regarding but not
14 limited to open accounts receivable, payments
15 received by both the insurance company and the
16 patients, denied claims and appeals and reviewing
17 rendered services against billed services."

18 Now, was part of the reason that UB
19 Solutions was retained was to get additional monies
20 that you believe was owed to Kingsway from insurance
21 companies that they had failed to pay?

22 A. The main reason for bringing them on
23 was because we were not -- we were not getting
24 communications from ReliaBill that -- so we needed
25 UB Solutions. I just wanted them to look over

1 everything that ReliaBill did.

2 Q. Did you have a concern about
3 ReliaBill's work?

4 A. I just, you know, felt like they kept
5 us in the dark. I wanted to make sure that I's were
6 dotted and T's were crossed.

7 Q. Now, when Kingsway's billing was
8 brought in-house, at that point did the internal
9 billing people for Kingsway continue to bill in the
10 same manner that ReliaBill was? Did they review
11 ReliaBill's work and continue to bill in the same
12 manner?

13 A. Yes.

14 Q. Who instructed them to do that?

15 A. They billed but they were, I think
16 they were learning more and more from the insurance
17 companies and it was -- like they were just getting
18 a better process.

19 Q. Internally getting a better process?

20 A. Internally, correct.

21 Q. Now, this document, just to finish
22 since I read part of it, "Per our findings, all
23 services billed for the time period listed above
24 were rendered by Kingsway Recovery Center." To make
25 that determination, what did UB Solutions look at?

1 A. The past records ReliaBill was doing.

2 Q. Just ReliaBill's records or what
3 else, anything else?

4 A. No.

5 Q. Did they look at utilization reviews?

6 A. I'm not sure.

7 Q. Did they look at the KIPU system?

8 A. I'm not sure.

9 Q. Did they look at clinician notes?

10 A. I'm not sure.

11 Q. Did they speak to any employees from
12 Kingsway who were actually providing services to
13 clients?

14 A. I don't think so.

15 Q. Now, are you familiar with the
16 billing term of bundled code or bundled billing?

17 A. Yes.

18 Q. Can you explain to me what that is?

19 A. A bundle code is a code that you
20 would use to kind of wrap up a couple different
21 services in one code.

22 Q. Okay. Now, do you know if Kingsway
23 Recovery was billing insurance under these bundled
24 billing codes for IOP or partial care treatment?

25 A. They are now.

1 Q. They are now. Do you know if prior
2 to the current time if Kingsway billed insurance
3 companies under this bundle code?

4 A. No, I don't think they -- I don't
5 know if they were doing that. The bundling happened
6 a little bit later.

7 Q. Okay. Do you know when, when -- I
8 guess I'll make it easier. Pre bringing the billing
9 in-house, when ReliaBill was doing it, were they
10 billing under the bundle codes?

11 A. Was ReliaBill billing under the
12 bundle codes and using the bundle services?

13 Q. Yes.

14 A. No. They were billing separate
15 services.

16 Q. Once you brought the billing
17 in-house, at that point did you go to the bundle
18 codes or when did you go to the bundle codes?

19 A. The bundling didn't happen until
20 later, so they were still separating like ReliaBill
21 was doing.

22 Q. How do you know that? Were you
23 reviewing ReliaBill's records?

24 A. No, it's just, you know, having
25 conversations with the billing company.

1 Q. How do you know that your internal
2 billing team was not using a bundle code back in
3 2021?

4 A. I don't know if they were -- what
5 code are you talking about?

6 Q. Like, for example, talking IOP, an
7 H0015 code?

8 A. I'm not sure if they were using that
9 specific code. I jut thought you were talking about
10 bundling.

11 Q. I am talking generally bundle codes,
12 right, so they exist for, I know at least for IOP
13 and PHP. Do they exist for something else?

14 A. Not to my knowledge.

15 Q. So those are what I'm referring to,
16 the IOP bundle code and PHP bundle code. I want to
17 get a sense of how you know what Kingsway was
18 billing using bundle billing or not. I'm trying to
19 get a sense of how you knew that?

20 A. Just by talking to the company.

21 Q. What about are you familiar with the
22 billing term of unbundled code?

23 A. Yes.

24 Q. And that is -- what's your
25 understanding of that?

1 A. So if you're billing an IOP bundle
2 code, so if you have an IOP bundle and then you have
3 an individual session and then you have a urine, I
4 think that was up on one of your things, since we
5 are out of network, not in contract with the
6 insurance company, you can separate the billing. So
7 you can have three different separate -- billing
8 separate and it's unbundled at that point.

9 Q. So that would be like billing group
10 therapy as one, individual therapy as another, maybe
11 urine collection as a third, for example, correct?

12 A. Yes.

13 Q. And does Kingsway Recovery currently
14 use unbundled codes to bill?

15 A. I think that's where we are getting a
16 little -- like the H code, which is a bundle code,
17 you can still use that and unbundle, but now at
18 Kingsway it's just the bundle code is up there.

19 Q. So you're telling me that it's okay
20 to use the bundle code and then also the unbundled
21 codes for the same services?

22 A. Yes -- not for the same services, for
23 different services.

24 Q. For different services. What's your
25 understanding of what's included in the bundled code

1 let's just say for IOP?

2 A. You can include the individual, the
3 urine is -- depends on the insurance company, I
4 think, so you can include the individual on the
5 bundle code.

6 Q. What else?

7 A. I'm not sure. I don't know.

8 Q. So where does your understanding come
9 from, you know, that you -- so I guess let me take a
10 step back. When you say you can bill the bundle
11 code plus additional services?

12 A. So when the insurance company sees
13 the bundle code, right, so they see additional
14 services with the bundle code, they unbundle the H
15 and that's how it's separated.

16 Q. Where does your knowledge of the
17 billing, where does that come from?

18 A. Talking to them.

19 Q. To who?

20 A. To my director of operations.

21 Q. And from talking to anybody else?

22 A. No.

23 Q. Do you talk -- do you personally ever
24 interact with insurance companies?

25 A. No.

1 Q. Does anyone from Kingsway personally
2 interact with the insurance companies?

3 A. Yes.

4 Q. Who is that?

5 A. Director of operations.

6 Q. Only -- that same woman who does
7 everything else?

8 A. Yeah. She interacts with them and
9 she interacts with, you know, with the insurance
10 people.

11 Q. Did Jessica Mercier do that too prior
12 to her leaving?

13 A. No.

14 Q. Now I want to direct your attention
15 to AR-85S which is now on the screen and also in
16 front of you. This is just one example of services
17 for one client that the Commission found that
18 Kingsway Recovery billed the health insurance
19 company. So as you can see on March 11, 2019, looks
20 like intensive outpatient treatment was billed under
21 procedure code H0015. On the same date, this is for
22 the same patient, procedure code 80305 was billed
23 for urine drug screening and 90834 was billed for
24 individual psychotherapy for 45 minutes. We talked
25 about H0015 being the bundled code; is that correct?

1 A. Correct.

2 Q. And then the individual
3 psychotherapy, which looks here to be procedure code
4 90834, would that fall -- is it your understanding
5 that that would fall under that bundled code?

6 A. If you're bundling the services, yes.

7 Q. Now, here if what you're looking at,
8 let's just say AR-85S, that is for, you know, one
9 patient and they are billing for that bundled code
10 and then also for the individual psychotherapy and
11 then urines, which you said is under the insurance
12 company, is what's depicted here billed twice?

13 A. No.

14 Q. So the individual psychotherapy isn't
15 included in the H0015 bundle code?

16 A. Correct.

17 Q. How do you know that?

18 A. By speaking with the director of
19 operations who spoke with -- who speaks with the
20 insurance companies. I'm just giving you the
21 information that I'm getting from the insurance
22 companies through somebody.

23 Q. Do you know which insurance company
24 she spoke to?

25 A. No, but I would think it -- it's all

1 of them.

2 Q. All of them being?

3 A. The ones that we utilize.

4 Q. Like, for example, I don't think we
5 went through which ones, specific ones?

6 A. Aetna, Horizon, CIGNA.

7 Q. So your understanding is the director
8 of operations reached out to the insurance companies
9 and asked them if that was an okay way to bill?

10 A. Yeah, it really is, when you have --
11 when you bill like that, it causes an administrative
12 complexity, but even like what you guys were saying,
13 if you're bundling the code, let's say you just have
14 the one code up there and you just send out the
15 H0015, okay? That's kind of doing it on the back
16 end, so the bundled code would be the only service
17 that you would send in to the billing, okay? That's
18 doing it on the back end, so a year later the
19 insurance company could call us up and go now we
20 want to see that service and we have to send them
21 medical records. Actually the way they were doing
22 it was showing it up front.

23 Q. Okay, so you're saying if it's
24 depicted the way it's depicted on AR-85S, that it
25 isn't billed twice, that that record is just showing

1 that an individual psychotherapy session was
2 included in the bundle billing?

3 A. No, no, it's separated. It's
4 separated. It's not included. I'm just saying for
5 reporting wise -- so think about this. If you have
6 an H0015 code, okay, and you are -- you are sending
7 that one code out, well, the insurance company's
8 going to want to know later that you were doing your
9 individual session, so they are going to want the
10 records later. But the way that ReliaBill was doing
11 it was actually separating them up front, and that
12 is done because we are out of network. There's no
13 contract with the insurance, and it's -- but it's an
14 administrative complexity. It causes, you know, it
15 causes some administrative problems.

16 Q. So was Kingsway getting paid, you
17 know, typically for a bundled billing code in
18 addition to, you know, like for this example,
19 individual psychotherapy session?

20 A. Let me give you a breakdown of like
21 an amounts breakdown. So let's say the H0015, if it
22 was just billed by itself would let's just say they
23 reimbursed \$100, okay? They reimbursed \$100 just on
24 that one code. The way they did it was, the H0015
25 would get \$70. The drug screen would get \$10, and

1 the individual session would get \$30, \$20 and that
2 would equal out to \$100.

3 Q. So where is the administrative
4 complexity? I'm trying to make sure I fully
5 understand what you're saying.

6 A. So they pay all different amounts,
7 the insurance company. I'm just giving you an
8 estimate, so instead of having \$100 in one shot, you
9 would have 70, 20 and ten.

10 Q. So and they --

11 A. They cap them. The insurance company
12 is only going to pay this much, and they'll cap you
13 on that reimbursement.

14 Q. So -- okay, so just so I'm clear, and
15 under intensive outpatient H0015 bundled code, an
16 individual psychotherapy session is not included
17 within that code?

18 A. I think you are getting confused.

19 Q. I am. I want you to clarify.

20 A. It's very complex.

21 Q. Can you answer that? That's not
22 included within the code?

23 A. If you bill that code, that one code,
24 if you just billed one code, it is included.

25 Q. But when you bill it twice, it's not?

1 A. It's not billing it twice. It's
2 separating the code. It's separating. They are
3 unbundled, so that right there is an unbundled H0015
4 as we see it there. It's unbundled. H0015 can be
5 bundled or unbundled.

6 Q. Okay. What is the code that can only
7 be bundled?

8 A. That code, that code is the bundle
9 code for IOP. It's an IOP session group.

10 Q. So what's included in it besides IOP
11 session group?

12 A. Umm, I'm not sure what other things
13 are included in the IOP session, but I think the
14 urine is included sometimes or not, but it's a
15 group, so that's a group. So they are paying for
16 the group.

17 Q. So your understanding is that H0015
18 is simply group session?

19 A. Yes.

20 Q. For intensive outpatient?

21 A. For group session. If you bundled it
22 it could be individual session, it could be maybe a
23 urine.

24 Q. So here you're saying because it
25 breaks it out beneath the bundled code, it's not

1 bundled?

2 A. Yes. So the insurance company would
3 see it and goes look, there's multiple services on
4 one day. We are going to unbundle that code.

5 Q. So the payment that Kingsway would
6 receive would not be for the bundled code amount.
7 The insurance company would know and just pay out
8 for the group session amount?

9 A. Yeah, they would pay out the same
10 thing.

11 Q. Now, was this practice, now this was
12 from 2019, this example in AR-85S. Once the billing
13 was brought in-house, did it continue to be done in
14 the same manner with billing of the bundled code but
15 unbundled also?

16 A. I believe so. But I think that, you
17 know, they were learning more and more from the
18 insurance company. That's how you work with the
19 insurance companies. It's very complex to deal with
20 them. You just learn from them and being out of
21 network, there's no like contract that says you have
22 to do in this or this. When you're not in contract,
23 you bill basically the way you want to bill.

24 Q. So it's your testimony that the
25 billing if it was done in the manner that it shown

1 on AR-85S, that that's appropriate?

2 A. It's appropriate and the only problem
3 with it is it causes administrative complexities.

4 Q. Now have you heard from insurance
5 companies about any issues with the way that
6 Kingsway was billing?

7 A. No.

8 Q. Have you -- okay. At any point, you
9 have not?

10 A. Um-umm.

11 Q. Okay.

12 A. No.

13 MS. CIALINO: Commissioners, any
14 questions based on that?

15 CHAIRWOMAN BREWER: I think I just
16 want to clarify as well. So in the example that you
17 gave of the hundred dollar reimbursement, are you
18 suggesting -- you were talking about for the line
19 that has the code, the bundle code, are you
20 suggesting that the insurance company would not have
21 given any reimbursement amount for the second two
22 codes that are listed here?

23 THE WITNESS: No, the way that they
24 did it --

25 CHAIRWOMAN BREWER: Yes.

1 THE WITNESS: The way ReliaBill did
2 it, instead of giving \$100 just for the bundle H0015
3 IOP group, they would give the group \$70. They
4 would give the urine screen \$10 and then they would
5 give the individual session \$20. So it would equal
6 out to the same, and if they do overpay at any point
7 or anything, they just take it back.

8 CHAIRWOMAN BREWER: I'm just curious,
9 how do you know that that's what the insurance
10 company is doing as opposed to independently
11 evaluating each line item that's being submitted as
12 a billed service?

13 THE WITNESS: Because when they see
14 it separate, when they see multiple services and an
15 H code, they unbundle it.

16 CHAIRWOMAN BREWER: But if they --

17 THE WITNESS: On the same day -- I'm
18 sorry.

19 CHAIRWOMAN BREWER: Right. If they
20 unbundle but also have two other items here that are
21 being billed separately, are you saying that they
22 ignore the two items that are billed separately that
23 are not under a bundle code?

24 THE WITNESS: What do you mean by
25 ignore?

1 CHAIRWOMAN BREWER: Would they still
2 reimburse the second and third line that we see here
3 on AR-85?

4 THE WITNESS: They would reimburse at
5 the lower rate like I'm saying, so the hundred, 20
6 -- I mean the 70, 20 and ten instead of one \$100
7 bundle.

8 CHAIRWOMAN BREWER: I'm just curious
9 based on your understanding, what is the purpose of
10 a bundled code if you're still going to bill the
11 individual component as well as the bundled code?

12 THE WITNESS: It's administratively
13 much sounder. It's easier to do that with the --
14 with billing. It's much easier, it is. It's
15 administratively very helpful.

16 CHAIRWOMAN BREWER: Do you have any
17 other questions, Commissioner Reina?

18 COMMISSIONER REINA: No.

19 CHAIRWOMAN BREWER: No other
20 questions from commissioners. Thank you, counsel.

21 BY MS. CIALINO:

22 Q. Now, do you know if Kingsway, when
23 the insurance companies actually paid Kingsway, when
24 the billing was done in this manner with the bundled
25 code and then the other, like the, for example, the

1 individual psychotherapy and the urine testing
2 broken out like that, do you know if Kingsway was
3 paid twice for that individual psychotherapy, paid
4 once within the bundle billing and another time
5 individually?

6 A. No.

7 Q. You don't know or you know they were
8 not?

9 A. They were not, because it's -- when
10 they see it, when the bill comes in and they see the
11 three different codes, three different services that
12 are rendered, they just disperse it that way.

13 Q. Do you personally review the paid
14 claims of the insurance companies?

15 A. No.

16 Q. Do you go back and review what
17 Kingsway submitted to determine if Kingsway was paid
18 in full?

19 A. No, because it's so -- the insurance
20 companies paid so much. It's different in
21 everything. It's so complex, like you have
22 different disbursements, you have different
23 reimbursements coming in from different insurance
24 companies for different services rendered. To go
25 back would be -- it's very hard to go back and do

1 all that stuff.

2 Q. Does Kingsway ever go back to
3 insurance companies and, you know, I guess, not
4 fight with them, but, you know, tell them that they
5 owe you more money than they paid?

6 A. Yes, we can negotiate, so let's say
7 we are billing out \$1,000 for a service and they
8 come back at 130, we can negotiate that up and we
9 may get 250.

10 Q. Who handles those negotiations?

11 A. The billing, billing team.

12 Q. Have you ever done it personally?

13 A. No.

14 Q. Called an insurance company?

15 A. No.

16 MS. CIALINO: Commissioners, any
17 additional questions?

18 CHAIRWOMAN BREWER: No.

19 MS. CIALINO: Mr. DeSimone, obviously
20 we've been here for a few hours. Your attorney
21 submitted a lot of questions to me previously, and I
22 tried to incorporate them all in, but I wanted to
23 give you an opportunity to, you know, say, give a
24 statement or if there was anything that you think I
25 missed that you think is important that we be aware

1 of, I want to give you the opportunity to do so.

2 THE WITNESS: You want to know like
3 anything about --

4 MS. CIALINO: You can talk to your
5 attorney first, if you wanted to make a statement.

6 THE WITNESS: Let me talk to my
7 attorney.

8 (A discussion takes place off the
9 record.)

10 MR. BROOKS: First, Ms. Cialino, I
11 just would like to say thank you. We did present
12 you with a number of different questions we thought
13 would be appropriate to ask, and you found a way,
14 again, as you did with Ms. DeSimone, incorporate it
15 all, we appreciate not only the professional
16 courtesy but, you know, you taking -- making the
17 effort to do that. Thank you for that. We have
18 nothing further in terms of questions.

19 CHAIRWOMAN BREWER: Mr. Brooks, could
20 you turn your mic on?

21 MR. BROOKS: Sorry, madam chair. I
22 did ask -- Mr. DeSimone did have a brief statement
23 he would like to read into the record and you had
24 indicated he would have the opportunity to do so.
25 Other than that, we thank you for your thoroughness

1 and professional courtesy of working in the
2 questions, and we just have a brief statement,
3 closing statement.

4 MS. CIALINO: Go ahead.

5 THE WITNESS: The field of addiction
6 treatment is a critical one in New Jersey and
7 elsewhere. I was a slave to addiction for more than
8 22 years. Addiction stole my youth and much of my
9 adulthood, and it devastated my entire family. It
10 nearly killed me. My wife Michelle and I moved in
11 with family for seven years because we had to work
12 tirelessly to turn our situation around. I was a
13 full-time student at the age of 40 and Michelle had
14 to work three jobs. But by the grace of God, AA, my
15 determination, and treatment centers like Kingsway,
16 I recovered.

17 Please understand that Kingsway is
18 not just a business to Michelle and me. Our mission
19 is to help others be set free of the grips of
20 addiction. It is our life's work. That is why we
21 take allegations of misconduct so seriously.

22 We have always sought to operate
23 Kingsway using industry best practices and are
24 motivated solely by what is paramount for the
25 treatment of our patients. As Kingsway's business

1 operations have grown, we have strived to make any
2 adjustments necessary to continue to achieve these
3 objectives. In the regard, Kingsway welcomes
4 oversight and any regulatory changes necessary to
5 ensure that the addiction treatment industry as a
6 whole continues to achieve these objectives.

7 Kingsway has helped many individuals
8 overcome their struggle with addiction, and I am
9 proud of what we have accomplished to date. Guided
10 by our own personal experiences, the lessons we have
11 learned, and a steadfast commitment to our mission,
12 we will continue to make every effort possible to
13 carry on the work of treating addiction and saving
14 lives.

15 Thank you.

16 CHAIRWOMAN BREWER: Thank you, Mr.
17 DeSimone. Anything further, counsel.

18 MS. CIALINO: No, I'm just like to
19 move into evidence AR-85 and AR-88.

20 (Exhibit AR-85 and AR-88, are received
21 into evidence.)

22 MS. CIALINO: And with that, you can
23 step down and I'd like to pass it back to the chair.
24 Thank you for your testimony here today.

25 CHAIRWOMAN BREWER: Thank you, Mr.

1 DeSimone. Thank you, Mr. Brooks.

2 MR. BROOKS: Thank you, Madam Chair,
3 I appreciate it.

4 CHAIRWOMAN BREWER: I ask Executive
5 Director Lackey, do you have any closing remarks?

6 EXECUTIVE DIRECTOR LACKEY: Just
7 briefly, putting on any public display of our
8 evidence is always a challenge, and once again I sit
9 here very proud of the work that our staff has done.
10 One of our former chairs used to call us the best
11 and the brightest, and today, as in many days, you
12 exemplify that. I want to say thanks to Lisa.
13 Thanks you so much for the time and effort that you
14 put in preparing for today. Your professionalism,
15 your ability, your analytical work was flawless, and
16 you stand on the shoulders of your team again. Your
17 team has again supported you, and they have made us
18 all very proud today, so thank you for your hard
19 work.

20 MS. CIALINO: Thank you.

21 CHAIRWOMAN BREWER: While I no longer
22 wanted to be a former chair that says our staff is
23 the best and the brightest, the current chair is
24 also saying that our staff is certainly the best and
25 the brightest. I do want to reiterate Director

1 Lackey's commendation of our staff led by Counsel
2 Cialino, who did an outstanding job. Thank you for
3 representing not only the Commission but the State
4 of New Jersey in the manner that you did today as
5 well as in our previous hearing as well as every day
6 that you show up to SCI.

7 I want to also just recognize our
8 deputy executive director, chief counsel as well.
9 Thank you very much for all of your hard work,
10 Marian Galietta. And Commissioner Reina, any
11 closing comments for you?

12 COMMISSIONER REINA: No, thank you,
13 Chair.

14 CHAIRWOMAN BREWER: On behalf of my
15 fellow commissioners, I do want to just continue to
16 thank all of you who attended today as we reconvene
17 our public hearings, those that are watching online
18 and those that are live as well.

19 Our work continues. It's not over
20 with this public hearing. Our investigation still
21 continues. We are concerned about, you know, issues
22 that we have seen and wanting to improve the
23 addiction rehabilitation industry and make it less
24 prone to abuse. So at the conclusion of this public
25 hearing, our work will continue.

1 I also want to thank our
2 investigatory staff as well, our administrative
3 staff, those who you don't see here on the platform
4 when we have these public hearings, but the entire
5 staff and our communications team as well all coming
6 together in order not only put on these public
7 hearings but to continue to work which culminates
8 also in our written report which will be forthcoming
9 as well.

10 So our hearing is adjourned for now,
11 and you will hear from us again in the future.
12 Thank you all. We are adjourned.

13 (Whereupon the proceedings were
14 concluded at 2:05 p.m.)

15

16

17

18

19

20

21

22

23

24

25

1 C E R T I F I C A T E

2

3 I, DONNA BRUNCK, a Certified Court Reporter of
4 the State of New Jersey, authorized to administer
5 oaths pursuant to R.S.41:2-2, do hereby certify that
6 the foregoing is a true and accurate transcript of
7 the public hearing that was taken stenographically
8 by and before me at the time, place and on the date
9 herein before set forth.

10 I DO FURTHER CERTIFY that I am neither a
11 relative nor employee nor attorney nor counsel of
12 any of the parties or attorneys to this action, and
13 that I am not financially interested in the action.

14 I DO FURTHER CERTIFY that the within
15 transcript format complies with Rule NJ ADC
16 13:43-5.9.

17

18

19 Donna Brunck, CCR

20 License No. 30XI00148700

21

22

23

24

25

A			
a.m 1:13	103:10,10,11	32:4 63:18	15:14 23:6
120:19	103:11,15,16	65:3 66:18	40:1 49:11
142:17,18	103:16,19,20	67:19,22	81:2 135:22
143:25 144:1	103:23,24	68:5 70:25	138:12
AA 19:15,16,21	104:2,2,15	71:15,17,18	172:18
19:23 182:14	104:17,18	73:6,14	additional
abandon 56:10	105:1,3,4,20	79:11 80:1	15:12 61:23
ability 12:4	106:5,8,13	86:2,4 87:21	62:23 101:18
184:15	106:14,17,21	87:22 102:22	138:18
able 104:23	107:2,5,5,7	103:15	162:19
122:3 139:25	107:8,21	105:10	168:11,13
abundance 3:19	108:1,1,3,3	110:10	180:17
abuse 185:24	108:4,5,10	112:25 113:1	Additionally
abuses 3:9	108:10,12,12	153:1 158:12	12:12
accept 47:2,4	108:17,18,19	162:14	adjourned
47:18,21,25	108:19 110:9	accurate 187:6	186:10,12
59:19,24	110:16 113:5	achieve 183:2	adjustments
accepts 6:14	113:6 114:19	183:6	183:2
access 38:9	114:19	acted 64:8	administer
67:18 68:15	128:19	action 5:4	187:4
79:11 83:9	152:23	187:12,13	administra...
83:13 94:18	accountant	active 15:18	49:7 57:12
94:21 154:7	6:12 8:16	activity 9:16	57:16,17,18
Accompanying	9:4 20:10	actual 16:5	65:19 131:19
11:17	21:7 32:15	30:9,17	157:7 171:11
accomplished	80:3,11	57:23 59:13	172:14,15
183:9	81:17 82:5,8	73:13 153:8	173:3 176:3
account 9:12	84:1 85:9	ADC 187:15	186:2
9:24 65:2,4	87:6 93:5	addiction 1:5	administra...
67:13,15,23	94:2,3	2:15 3:5 4:2	178:12,15
67:23 68:5	107:18,22	4:12,17 6:2	admission
71:21 72:2	108:15	6:11,16,17	54:23 146:14
73:7 78:2	113:15	7:20 8:7	admissions
79:17,20,24	accountants	14:9 18:14	39:21 52:21
85:7 86:2,3	80:9	20:2 21:9	52:22 53:1
87:19,20	accounting	23:13 24:14	53:13 55:5,6
92:13,20	80:8,24 81:4	27:7 29:5,19	55:11,15
95:16,17	81:9,21 82:3	29:22 30:5	146:14
97:4 99:10	82:12,14	30:10 42:5	admit 4:6
99:10,16,19	84:5,7,21	138:18 182:5	adopted 11:17
101:14,16,18	85:4,12,12	182:7,8,20	ads 51:22
101:22,23,23	85:13,17,18	183:5,8,13	adulthood
102:1,3,5,6	92:7 108:25	185:23	182:9
102:13,13,18	accounts 8:24	addictions	advanced 41:6
102:24	9:12,21 10:2	15:9 28:19	Advertising
	10:3 22:20	addition 8:25	51:17

advice 84:15 107:22 108:15	69:12,25 71:12,13,22 72:12,17,22	and/or 106:18 Andy's 145:18 ANNEX 1:10 ANNEXED 2:20	approximately 23:18 25:25 50:4 51:4
advise 67:8 84:14 112:10 112:14 113:19	73:4 77:5,7 77:10,11,19 82:21 83:18 97:2,7,9,25	answer 5:2 12:8,9 13:21 77:25 152:13 173:21	57:6 62:4,10 62:11 66:21 84:10 92:12 109:13 144:21
advised 32:18	amended 88:17 90:22	anybody 34:23 63:20 67:8 72:16,18	April 16:11,12 apt 59:19 AR 152:24
advisement 107:17	Amestica 142:13	73:12 79:10 86:7 113:16 129:3 130:15 168:21	AR-85 2:14 110:4 178:3 183:19,20
advisor 81:13	Ammon 132:21 132:22	anymore 19:24 58:16 76:3 112:3,9 134:16	AR-85S 169:15 170:8 171:24 175:12 176:1
Aetna 62:10 171:6	134:12,13,14 134:14,19,21 136:10,23 137:8 139:3 139:5 140:11 140:12,15,17 141:8,10,15 141:18,21,23 142:3	APN 41:6,13,13 41:16,17,25 42:1,2 44:21	AR-85V 114:11 AR-85W 112:22 114:1
afford 149:3,7	amount 7:6 9:13 33:22 45:22,23 48:4 50:22 59:25 60:2 62:3 69:20 84:22,22 92:9,25 112:1,18 113:6 116:9 160:16 175:6 175:8 176:21	APNs 41:4 44:9 app 74:15,16 74:18 75:1,3 75:4,5,8,11 75:20,24 76:2	AR-88 2:18 161:14,23 183:19,20
aftercare 149:13	amounts 9:10 9:19 62:18 62:20 110:18 111:4 153:5 172:21 173:6	appeals 162:16 appear 5:3 appearance 3:20 5:14	areas 4:12 argument 27:3 Arizona 28:25 ASAM 125:14 ASCO 51:14
age 182:13	Amy's 145:14 145:16,19,25 146:22	appeared 4:21 9:2 10:4 appearing 10:20,24	asked 49:11,18 134:7 171:9 asking 86:24 aspect 60:19 assess 44:17 125:6,11
agent 7:16,23 9:14,21 10:10	analytical 140:11 141:15 184:15	appears 161:17 appointments 43:16 44:17 appreciate 181:15 184:3	assist 54:18 54:20 59:10 162:11 assisting 137:22
agents 6:8,22 7:6 8:2		appropriate 176:1,2 181:13 approximate 65:9 144:22	assume 77:14 77:15 123:5 athletics 17:25 Attached 11:20 attempt 10:4 attend 8:11
ago 4:1 35:25 66:21 69:8 109:15,22			
agreement 85:24 140:10 140:11 141:3 141:13			
ahead 12:13 17:14 182:4			
alcohol 3:10 4:9 12:4 31:6 54:7			
all-staff 58:12			
allegations 122:6 182:21			
Allied 47:11			
allow 29:15			
allowed 147:13 147:20			
allowing 7:12			
allows 5:10			
Alloy 64:15,23 64:24 69:10			

150:4	118:22	bank 9:11	137:11
attendance	119:11	10:12 63:14	bathroom
5:16	149:24	63:18 66:15	143:10
attended 8:7	180:25	66:18 67:13	Bay 26:11, 12
148:23		67:14, 18, 22	26:16, 20
185:16	B	68:5 71:15	27:5, 6, 17
attending 54:6	B 1:14 2:11	71:25 72:2, 5	128:16
60:11, 13	141:17	74:19, 20, 24	began 49:23
146:20	bachelor's	75:12 78:1	64:20
attends 148:6	30:21	79:11 89:22	beginning
attention	back 12:24	94:13 95:14	33:21 82:9
11:13 110:3	17:22 18:19	95:15, 16, 17	110:14 116:3
112:21	19:23 20:1	98:11 101:17	120:4
120:12, 14	20:16 24:15	101:21	begins 46:18
161:13	25:10 29:18	105:19	behalf 3:16
169:14	30:19, 20	109:18, 19	10:20 63:12
attorney 12:12	31:10 32:24	110:8, 9	65:7 70:7, 24
13:3, 15, 23	34:6 48:5, 24	112:25	71:8, 11
180:20 181:5	54:8, 14 56:3	banking 9:2, 9	76:22 79:20
181:7 187:11	59:8 77:3	18:8, 9 19:20	82:10 85:19
attorney's	78:16 80:6	19:24 20:25	93:4 97:15
13:11	80:13 100:13	21:22 23:9	105:24
attorneys	114:7, 23	23:16 63:12	159:19
10:17 13:8	115:25	76:20, 23	185:14
81:4, 6	118:24	79:7, 14 90:1	behavioral
187:12	122:24 123:5	96:10 99:10	24:11
auditing	124:18 135:9	109:7 112:19	believe 14:25
115:16	141:9, 10	banks 75:10	17:18 32:7
auditor 115:15	142:3 149:9	based 4:6	32:10 37:13
115:17	166:2 168:10	10:11 24:11	42:14 45:19
authority 5:15	171:15, 18	54:13 109:25	46:25 51:3
63:17 65:4	177:7 179:16	139:15	62:13 63:21
authorized	179:25, 25	150:15	64:6 65:5
94:24 187:4	180:2, 8	153:17	72:7 77:9
automatically	183:23	176:14 178:9	78:3, 9 83:16
72:6	background	basement 20:23	84:23 85:2, 5
average 51:5	21:21 28:17	20:24	85:22, 22
123:10 126:6	29:6 48:10	basically	88:14, 18
avoid 3:19 9:3	48:14 59:10	151:12	90:20 93:9
9:8 112:18	59:13, 15	175:23	93:17 94:5
113:23 114:3	109:5, 25	basis 8:1 33:1	95:1 96:8
aware 12:17	134:5 159:8	34:15 35:22	98:9 99:15
14:19 56:24	159:9, 10	37:19 54:10	101:2, 2, 11
87:8 95:19	bad 18:11, 24	54:12 73:15	103:1, 2, 3, 25
109:12, 13	19:1	84:4, 11	104:11, 12
118:15, 17, 18	balance 73:18	132:9 135:4	105:2 106:7

108:13	7:19,21	171:17 172:2	10:25 44:2
112:23 116:6	122:10,11	172:17 174:1	44:12,16,22
116:11,13	162:17	175:12,14,25	59:7,21 60:6
121:11 127:1	163:15,23	176:6 178:14	60:17 61:7
128:21 132:2	165:2 169:18	178:24 179:4	61:15,19,22
132:2,10	169:20,22,23	180:7,11,11	78:16,20
133:15	170:12	billings 7:24	79:2 114:9
135:14 136:4	171:25	bit 18:24	114:15,20,25
136:24	172:22	21:19 22:15	115:4,7,10
138:25	173:24	28:16 40:4	115:13,19
139:24 142:9	177:12,21,22	48:6 54:21	139:16,20,24
145:3,5	biller 157:22	57:9 60:7,14	140:5 150:17
148:8,12,14	billing 4:21	62:2 80:5,6	176:15,25
149:21 154:1	7:12,15,17	88:25 130:4	177:8,16,19
155:3 158:3	8:19,25 33:2	141:5 144:7	178:1,8,16
160:6 161:15	33:11 35:6	150:19 161:4	178:19
162:20	39:22 66:10	165:6	180:18
175:16	66:12 94:3	biweekly 126:5	181:19
believed 153:5	127:18 128:2	block 113:2	183:16,25
beneath 174:25	129:21,24,25	Blue 62:9,10	184:4,21
benefits	129:25	63:8,8	185:14
122:25	141:17	bookkeeper	Bridgeton
124:25 128:5	150:21 151:1	64:19 72:18	99:14 100:24
best 182:23	151:5,9,11	96:19,21	brief 6:7
184:10,23,24	151:18,19,23	bookkeepers	78:15 181:22
better 19:19	152:13,22,22	64:10,14	182:2
36:4 60:22	152:24	67:6 70:19	briefly 5:20
163:18,19	153:21	72:13 75:15	89:5 184:7
big 20:8 22:2	154:15	77:4 97:3	brightest
22:25 36:15	155:14,19	bookkeeping	184:11,23,25
129:24	156:20	64:25 70:20	bring 11:13
158:18	157:14,14,21	70:24 82:18	66:13 92:15
biggest 62:8	158:11,19,24	Books 83:8	92:18,25
bill 8:13 78:4	159:1,12,15	bottom 161:19	154:14
84:23 130:1	159:17,24	bought 106:20	bringing 92:19
137:13 154:6	160:11,22	box 97:13	97:2 162:22
154:6 155:24	161:10 162:8	branch 22:5,9	165:8
163:9,11	162:11 163:7	23:7	Broad 101:10
167:14	163:9 164:16	break 13:14,15	broken 4:2 9:7
168:10 171:9	164:16,23,24	78:13,24	179:2
171:11	165:8,10,11	139:18 140:2	Brooks 1:19
173:23,25	165:14,16,25	breakdown 73:3	10:18,19
175:23,23	166:2,18,18	172:20,21	13:6 64:21
178:10	166:22 167:1	breaks 174:25	79:1 80:24
179:10	167:6,7,9	Brewer 1:14	181:10,19,21
billed 7:5,18	168:17 170:9	3:1,3 10:22	184:1,2

brought 62:3 96:21 98:6 99:3 120:12 120:13 140:23 141:20 153:19 155:14,20 156:4 163:8 165:16 175:13	171:13 Bunti 21:16 burden 60:8 Burzichelli 3:14,17 business 9:25 10:2 20:17 28:12 32:2,3 34:25 73:25 82:3,12,14 87:3 95:18 95:22 96:15 96:16 97:1 97:22 98:1 98:11,22 99:9 102:11 102:13 114:14,19 115:2 133:3 158:18 182:18,25	Caminiti 1:20 10:23,23 campaign 51:14 Canyon 20:3 28:23 29:9 cap 173:11,12 Capital 78:8 78:10 card 69:9 78:5 78:5,6,10 cards 68:8,11 68:13,16,19 69:3 70:7,12 70:13,17 care 4:5 5:13 6:20,23 26:11 40:6,8 40:10,12,13 40:19,23 42:13 43:1 43:20 44:25 45:21 47:11 48:6,6,11,16 53:8 60:4,12 60:15 61:4 116:3 117:8 123:9,15 124:1,6,13 124:21,23 134:18 164:24	96:5,9,14 categorizing 96:7 category 96:2 causes 171:11 172:14,15 176:3 causing 19:9 caution 3:19 CBT 24:11 CCR 1:24 187:19 center 4:17,18 5:13 6:9,10 6:21 14:9 20:15 27:18 30:18 34:4 49:6 57:16 130:2 163:24 center's 4:25 centers 3:10 4:6 53:23 148:9 182:15 CEO 14:7 34:8 35:9 36:7 38:2,8,13,16 58:9 61:10 certain 7:8 62:22 63:6,7 certainly 184:24 certificates 31:1,8 certified 1:25 30:10 140:14 187:3 certify 187:5 187:10,14 CFO 61:12 Chadd 1:15 3:22 chair 1:14 3:3 5:25 6:1 10:18 78:18 79:4 140:7 181:21
Bruce 100:3,6 Brunck 1:24 187:3,19 build 38:3,5,5 38:7 building 16:20 16:25 bumped 124:3 bundle 7:20,22 164:19 165:3 165:10,12,12 165:17,18 166:2,11,16 166:16,18 167:1,2,16 167:18,20 168:5,10,13 168:14 170:15 172:2 174:8 176:19 177:2,23 178:7 179:4 bundled 164:16 164:16,23 167:25 169:25 170:5 170:9 171:16 172:17 173:15 174:5 174:7,21,25 175:1,6,14 178:10,11,24 bundling 165:5 165:19 166:10 170:6	buy 106:13 buyer 22:19 buying 8:23 <hr/> C <hr/> C 1:16 91:25 187:1,1 call 5:23 20:10 40:12 53:1,3 54:23 69:22,24 72:22,25 130:4 146:13 150:5 160:2 171:19 184:10 called 14:8 15:2,16 19:3 19:15 22:7 24:21 33:13 51:14 75:5 109:10 133:2 134:14 136:8 180:14 calls 54:21	Carlton 128:21 129:9,11,16 carry 183:13 case 3:25 43:6 43:9,12,15 43:21 45:17 46:7 58:4 120:1,3,6 122:9 case-by-case 54:10,12 caseload 24:25 cash 8:24 105:6,8 categorized	

183:23 184:2	144:24	clear 27:17	145:9,12
184:22,23	check-in	143:4 173:14	148:17
185:13	139:17	clicked 95:24	164:13
chairs 184:10	checked 97:13	95:25	clients' 125:2
CHAIRWOMAN 3:1	checks 65:13	clicking 96:4	131:2
10:22,25	65:21 66:4,5	client 7:2,11	clinic 24:16
44:2,12,16	66:6,17	22:21 43:11	24:21,24
44:22 59:7	chief 3:23	48:6 53:3,4	25:4,8 26:4
59:21 60:6	61:12 185:8	53:7 54:18	clinical 31:6
60:17 61:7	choose 146:17	54:20,24	38:23,24
61:15,19,22	choosing	56:2,10,20	39:1,4,5,8
78:16,20	128:11	59:12 60:12	39:11,24
79:2 114:9	133:24	63:2 117:6	40:1 48:8
114:15,20,25	chose 108:16	118:24	54:9 58:13
115:4,7,10	133:8,10	121:13	117:12,14
115:13,19	Christopher	122:23	118:4,6
139:16,20,24	143:21	125:11	119:5 125:19
140:5 150:17	Cialino 1:18	130:23	125:21 126:7
176:15,25	2:6 3:24	142:25	126:11 132:6
177:8,16,19	5:20,22,25	143:11	133:9,11,18
178:1,8,16	11:3,9 44:23	146:13	133:18
178:19	61:23,25	148:20 149:1	135:20
180:18	78:12,17,18	169:17	149:20
181:19	79:4,5 81:1	client's 125:3	clinicals
183:16,25	114:6 115:22	125:24	125:18
184:4,21	115:23	130:19,21	127:13
185:14	139:14,19	138:16	clinician
challenge	140:7,8	clients 6:14	54:12 117:23
184:8	176:13	6:18 7:2,9	118:3 164:9
change 34:5	178:21	8:8,13 25:1	clinicians
100:18 112:7	180:16,19	37:15 40:16	35:2 130:20
changed 17:16	181:4,10	44:6 45:1	close 134:9
22:8 31:19	182:4 183:18	47:22 48:8	closer 51:7
35:18,20	183:22	50:16,20	closing 182:3
77:10 160:16	184:20 185:2	51:10 52:1,5	184:5 185:11
changes 60:21	CIGNA 171:6	52:8,11,14	clue 118:17
183:4	circular 10:2	52:17 54:1	code 11:22
charge 120:24	claims 152:19	56:6,25 59:9	164:16,19,19
135:18	154:12	59:11,16,23	164:21 165:3
151:11,12,18	162:16	59:25 106:13	166:2,5,7,9
155:17,23	179:14	107:3 116:4	166:16,16,22
charged 12:9	clarify 44:19	119:23 120:2	167:2,16,16
chart 110:17	60:1 115:1	131:25	167:18,20,25
check 65:6,10	173:19	142:24	168:5,11,13
66:3,6,7,13	176:16	144:16,18,22	168:14
66:14,15	Clark 100:4,6	144:25 145:8	169:21,22,25

170:3,5,9,15	140:15	commissioner	130:20
171:13,14,16	collects 135:1	1:15 3:14,14	131:13
172:6,7,17	143:22	3:17,18	147:17
172:24	college 18:2	115:20	150:22 153:6
173:15,17,22	Columbia 63:16	150:15,18	154:7 155:25
173:23,23,24	63:18	178:17,18	158:15
174:2,6,8,8	combined 32:3	185:10,12	162:21
174:9,25	67:6	commissioners	163:17 165:3
175:4,6,14	come 10:15,17	59:5 114:6	168:24 169:2
176:19,19	24:19 40:25	139:15	170:20,22
177:15,23	46:21 51:10	176:13	171:8 175:19
178:10,11,25	51:20 55:22	178:20	176:5 178:23
coded 95:17,21	59:16 65:14	180:16	179:14,20,24
97:22 98:22	65:21,21	185:15	180:3
codes 164:24	66:7,8 74:23	commitment	company 15:1,6
165:10,12,18	89:1,15 95:6	183:11	15:17 16:1
165:18	102:2,7,8	communicate	16:16 17:8
166:11	111:22	84:1,5,9	22:6 23:8
167:14,21	120:18	92:8,11	31:22 32:9
176:22	134:24 168:8	129:7,11	33:2,11 38:5
179:11	168:17 180:8	130:2	38:7 52:24
coding 97:1	comes 104:14	communicated	66:22 67:2
coffee 20:6	136:3 179:10	129:9	77:6,14,15
cognitive	coming 20:20	communicating	77:16 78:6
24:11	33:22 44:7	84:3,7 92:5	81:11 105:24
coincident...	55:2 84:13	153:11	123:8,12,14
80:7	107:2 128:19	communication	123:17,22
collaborate	179:23 186:5	83:24 152:9	124:5,19,20
149:22	commendation	152:11	125:17,22
collaboration	185:1	communicat...	126:1,9
149:22	comments 59:8	30:24 162:24	127:16,18
collaborative	185:11	186:5	134:5 137:13
41:18	Commission 1:2	community	145:6 148:3
collect 104:12	1:18 3:4,13	149:9	155:16
104:23	3:16 4:22	companies 4:24	158:19
131:25 141:8	5:4 7:14 8:5	6:19 7:5,13	162:15
142:24	9:10,17	7:18 8:13	165:25
collecting	10:16,19	14:19,24	166:20 167:6
143:5	11:16,21	15:15 17:3	168:3,12
collection	60:20 110:8	18:18 47:15	169:19
137:23,25	112:24	62:4,9,15,15	170:12,23
138:10	169:17 185:3	62:16,23	171:19 173:7
140:13,17	Commission's	66:5 107:3	173:11 175:2
143:9,15	5:7,12,15,18	122:11 125:4	175:7,18
167:11	11:19,24	126:13,25	176:20
collectors	14:4	127:3,14	177:10

180:14	conduct 4:11	continued	51:24 57:11
company's 80:1	13:21	17:24 18:5	61:21 62:5,6
158:21 172:7	conducting	150:6	62:12 72:7
compare 44:25	5:16	continues	79:8,17,18
compel 5:5,15	conflict 3:20	183:6 185:19	81:17,18
compensation	confused 65:17	185:21	82:6 89:7
115:5	141:5 173:18	contract 85:23	95:4 100:13
complaint	confusing	133:13,16,25	101:8,9
117:7,10,23	65:25	136:22 142:3	103:12
117:25 118:1	connected	142:6,10	114:16 116:5
118:5,8,11	71:23 72:1,3	153:20,21,23	122:4 133:5
complaints	74:19 75:11	154:19	135:7 136:12
118:19,20,25	consecutive	162:10 167:5	139:12 140:4
119:11	9:13,20	172:13	141:11
completed	110:14 113:8	175:21,22	142:14
10:14	113:11	contracts	163:20
complex 173:20	consist 22:10	155:4,7	167:11
175:19	24:9 51:15	controller	169:25 170:1
179:21	51:16	39:22 61:14	170:16
complexities	consistent 9:6	63:21,23	correlates
176:3	consistently	64:5,8,11	59:12,14
complexity	5:17	65:8 66:17	corruption 4:4
171:12	consists 40:14	66:21 67:3,5	cost 50:8,11
172:14 173:4	40:15	67:9 70:20	100:23
complies	consult 13:8	72:9 75:18	costs 50:13
187:15	21:8	75:23 82:20	counsel 1:18
component	consulted 21:6	82:23 93:18	1:20 3:23,23
178:11	21:12	93:24 94:1	5:11,19,24
computers	consulting	conversation	78:20 79:3
68:24	159:20,22	37:3 86:22	115:20 140:6
concern 37:16	contact 128:22	87:17 113:15	143:20
163:2	141:17	conversations	178:20
concerned	containers	37:4,9 87:23	183:17 185:1
185:21	140:14	109:2,3	185:8 187:11
concerning	contaminating	161:9 165:25	counseling
5:12	7:9	copy 66:14	20:2 24:25
concerns	contempt 5:5	110:5 112:23	25:12,15,20
162:11,13	continuation	161:15	25:23 26:7
concluded	3:7	Corp 31:24	28:19 29:5
186:14	continue 7:12	32:1,2,6,12	29:19,23,24
conclusion	140:2 149:3	corporation	29:25 48:20
185:24	163:9,11	31:23	116:2,15,22
condition	175:13 183:2	correct 13:4	119:14,24
125:6,7,8,11	183:12	34:9 39:15	counselor
condolences	185:15,25	39:17 40:2	30:10 31:5,6
3:17	186:7	43:4 44:8	31:7 143:2

counselors 25:9 30:14	111:10	137:3 146:20	151:19,20,23
couple 25:7 31:8 76:12 84:8 97:18 97:18,20 98:24 130:7 164:20	current 139:6 165:2 184:23	175:4 177:17 185:5	160:11
course 13:14 57:7	currently 14:14 17:4 34:14,19,23 50:17 55:9 57:4 65:7 70:20 71:7,7 84:6 126:15 132:11 142:7 142:23 143:6 144:9 151:3 151:9 160:10 167:13	day-to-day 32:25 33:19 34:14 35:15 35:22 37:6	dependence 4:9
court 1:25 5:5 13:19 59:18 187:3	cut 6:25 116:15,22	days 9:8,13,20 40:15,16 42:16,19 45:1,2 46:1 110:14 113:12 123:7 184:11	dependents 130:1
courtesy 181:16 182:1	cutting 117:1 118:19	deal 175:19	depends 46:2,3 124:7,9 168:3
courts 5:17	<hr/> D <hr/>	death 3:15	depicted 170:12 171:24,24
cover 31:13,17 123:8,22	D 2:1	debit 68:8,10	depositing 66:17
coverage 4:7	D-28 99:19,20	DECEMBER 1:12	deposits 65:6 65:11
crash 18:15	D28 16:14,19 16:20,23 17:7 99:24 99:25 100:1 100:2,11,13 100:16,23	deceptive 8:25	Deptford 101:11 145:17,21
create 111:10	daily 8:1 42:15 137:11	decide 17:21 46:16 107:16 112:2 158:13	deputy 185:8
credit 68:13 68:15,19 69:3,9 70:7 70:12,13,17 78:4,5,6,10	Dalbow 158:7	decided 18:25 19:14 20:1 20:10 108:7 112:12,13	describe 60:7 60:9,18
criminal 13:20	dark 163:5	decides 54:13	described 11:23 61:8
critical 182:6	date 1:12 36:6 51:6 127:23 169:21 183:9 187:8	decision 47:24 54:9 67:10 78:23 158:14	describes 11:19
Cross 62:9 63:8	dates 113:8	decision-m... 59:24 60:24	DESCRIPTION 2:13
crossed 163:6	day 7:25 9:10 9:19 19:3 36:24 37:2 42:16 45:3 45:13,15,25 87:19 110:13 111:14 136:19,20	decisions 12:5	designed 9:3
crossroads 19:13		define 38:1	DeSIMONE 2:5 4:16 5:1,6 5:10,23 8:5 10:8,15,21 10:24 11:1,6 11:11 14:2 14:17,18 78:19 79:14 180:19 181:14,22 183:17 184:1
crying 20:19		definitely 149:22	DeSimone's 4:24 5:14 8:4
CTR 109:10		degree 20:2 30:9,21	DeSimones 9:18
culminates 186:7		degrees 29:5 30:25	DeSimones' 8:22 9:2,12
culture 36:15 36:16 37:14 37:17		Delaware 24:22 25:5	desks 68:24
cumbersome 60:14 61:3		denied 162:16	
curious 177:8 178:8		department 35:6 55:7 151:6,9,13	
currency 109:10,14			

detail 87:16 152:11	20:13 21:14 52:12 54:25	68:18 70:9 70:10,16	162:1,3,9 163:21
detailed 4:20 6:6	54:25 55:3 56:12,13	76:17 93:7 116:18	documentation 70:5
detection 114:3	62:15,17,17 62:20 73:3	117:13,14,17 118:4,6	documented 118:6,9,10 118:25 119:1 119:2,4 120:21
determination 54:13 56:19 149:17 163:25 182:15	92:9 121:23 123:6,20 126:1,2 134:11 146:16 159:13	119:5 121:3 121:20,21 122:14,21 132:6 133:9 133:11,19 135:20	documenting 120:24
determine 100:23 131:25 179:17	164:20 167:7 167:23,24 173:6 179:11 179:11,20,22 179:22,23,24 181:12	149:18,19 151:10 160:2 168:20 169:5 170:18 171:7 184:5,6,25 185:8	documents 11:22 49:15 76:16 93:10 93:13,17,19 94:2,3,11 133:20
determined 132:4			doing 7:10,19 28:4 29:23 29:25 33:19 33:25 37:6 75:15 77:7 82:12,17 86:8 96:6,10 96:18 97:10 97:14 111:6 113:16 124:14 127:10 129:14 130:9 130:12,23 133:3 140:17 140:25 152:24,24 153:9 156:8 157:11,15 160:18 164:1 165:5,9,21 171:15,18,21 172:8,10 177:10
determines 146:8	digital 51:11 51:13	directors 58:15	
detox 46:12,13 46:19 54:8 54:14 56:3 122:24 124:14,16,19 124:22,23	direct 2:6 11:9 110:3 112:21 161:13 169:14	disbursements 86:19 179:22	
detoxes 53:22 53:25 54:4 54:16 55:20	directly 10:6 10:7 65:14 65:22 77:17 107:20,21,25 108:4,21 129:7,9 135:12	discipling 20:5	
devastated 182:9		discovered 9:1 9:11	
developed 17:24	director 1:15 3:22 34:16 34:18 36:8 36:12,25 37:18 38:23 38:24 39:2,5 39:5,7,8,9 39:11,14,16 39:19,21,22 39:24,25 40:1,2 53:13 55:11,15,17 58:11,21 61:18,19	discretion 50:24	
Diagnostic 142:7		discuss 133:23	
Diane's 145:14 145:23 146:18		discussed 37:18 105:10 114:1 143:24	
Dickinson 102:20		discussion 70:16 139:22 181:8	
die 19:14		disguise 10:4	
differ 123:11		disorganized 161:5,6	
difference 45:21		disperse 179:12	
differences 60:18,23		display 184:7	
different 18:1		doctor 41:2,3 41:8,9,19	
		document 2:18 110:11 161:20,21,23	

downplay 131:2	early 7:3	EMR 61:3	34:14
downplayed 130:22	earned 102:8, 9 102:10	126:12 154:8	everybody's 37:12
downplays 125:7	easier 61:6 110:6 165:8 178:13, 14	En 15:3, 4, 11 145:6	EVID 2:13
downsizing 80:16	easy 4:13	enabled 8:20	evidence 7:14 7:17 24:11 144:6 183:19 183:21 184:8
Dr 41:10, 11	educational 28:17 29:6	enables 6:20	evidence-b... 59:20
drank 19:8	effort 181:17 183:12 184:13	Enabling 11:21 11:24	exact 36:6 144:11
draw 115:7	either 12:24 19:13	ended 150:6	exactly 21:23 22:14, 16
drew 115:11	electronic 33:3, 14, 15 38:10 56:1 121:9	engage 7:8	exaggerates 125:7
drink 18:13	electronic... 74:23	Enlightened 54:2	EXAMINATION 2:6 11:9
drinking 17:24 18:3, 17, 21 18:23 19:2, 4 19:11, 18 23:2	elicit 4:11	ensure 183:5	example 42:1 87:18 92:18 110:7 166:6 167:11 169:16 171:4 172:18 175:12 176:16 178:25
driven 148:1	employed 150:23	entail 83:13	excuse 6:17 102:18
drug 3:9 4:9 31:6 59:18 169:23 172:25	employee 73:13 115:16 138:1 138:5 143:7 187:11	entering 133:25	executive 1:15 3:22 184:4, 6 185:8
drugs 12:3 54:7	employees 38:19 43:21 57:3 137:18 137:21 138:6 138:7, 12 147:7, 11, 18 147:23 148:1 151:22 155:24 156:19 157:12, 21 158:8 164:11	enticements 8:8	exemplify 184:12
Duane 10:20, 24 16:4 80:8, 21 81:2, 5 91:7 91:10, 11, 18	employers 128:14	entire 7:5 31:17 182:9 186:4	Exhibit 2:13 112:22 161:23 183:20
due 125:24, 25	employment 15:12 17:6 21:20, 20, 23	entity 72:17 150:21	exhibits 2:20 4:20
DUI 59:17	empowered 58:19	entries 71:8 71:11	exist 166:12 166:13
duly 11:6, 17		environment 19:7, 9	expand 80:4
duplicatus 8:19		equal 173:2 177:5	expansion 37:24
duration 116:17		error 95:24	expenses
duties 22:10		especially 72:16	
duty 55:9		ESQ 1:17, 18, 19 1:20	
dynamic 60:10		essentially 40:1 155:2	
		Estate 16:14	
E		estimate 173:8	
E 1:14, 14, 16 1:16 2:1, 11 187:1, 1		evaluating 177:11	
earlier 5:3 6:6 61:8 95:3		evasion 9:15 10:13	
		event 123:1	
		eventually 20:7 126:8	
		everybody 34:7	

111:18	27:13 30:14	113:23	financially
114:13, 14, 16	32:25 35:15	fee 153:13, 13	187:13
114:21, 22, 24	35:22 36:9	153:14	financials
115:1, 2, 2	37:7, 14, 17	feel 12:16	115:17
experience	38:4, 6 40:18	13:19 66:23	find 56:12
10:11 24:18	41:1, 9, 12, 14	feeling 46:23	finding 5:16
101:5 158:23	41:15 45:22	feet 57:8	findings 4:21
159:11	46:20 49:3, 9	fellow 185:15	5:2, 12 6:6
experienced	49:20 50:12	felt 67:3, 4	163:22
156:4 158:17	50:13, 24	163:4	fine 87:14
experiences	54:19 56:25	female 142:24	finish 139:25
183:10	57:10, 24	142:25 143:1	163:21
explain 30:1, 3	58:5 64:20	143:6, 11	fired 155:1
36:13 37:4	65:18 66:8	fentanyl	firm 10:20
37:10 40:13	100:24 101:1	124:15	first 4:1 11:6
54:21 59:11	135:7 138:8	field 182:5	19:16 32:23
59:13 66:2	141:25 142:1	fight 180:4	33:5 61:11
123:13 124:8	143:14	figure 54:16	64:21 86:12
143:8 146:10	146:20	file 5:4 88:1	113:2 123:3
152:10	fact 5:16	88:6, 9, 11	127:7, 8, 9
164:18	failed 5:3	90:8, 12 93:3	181:5, 10
explained 6:15	12:16 162:21	filed 88:4	five 12:13
8:17	Fair 11:22	90:12 91:11	40:16, 16, 17
exploit 4:14	fall 170:4, 5	91:24 92:3	40:21 42:16
exposed 3:8	falls 82:15	93:8, 11, 21	48:3 80:12
4:2	false 12:9	94:10 119:6	87:19 88:2, 5
extension 56:8	falsified	files 116:16	105:11
56:11 149:12	138:15	filing 83:21	123:24 152:1
149:14	familiar 22:15	83:23 84:16	152:2, 3
external	90:3 109:9	89:10 90:24	five-hour
115:14, 17	109:25	fill 131:12	40:15
	142:19	154:11	five-minute
	164:15	filling 83:14	78:13
	166:21	93:15 126:8	fixed 96:23
F	family 3:16	final 36:21	98:1, 3, 8
F 1:14 187:1	182:9, 11	finance 76:7	flags 9:1
face-to-face	far 24:15 44:3	financed 8:22	flat 160:6
41:20	60:8	finances 49:16	flawless
facilities	favor 5:18	63:12 73:6	184:15
6:17 8:12	15:3, 4, 11	76:7, 11, 20	floor 5:24
21:14 48:4	145:5	79:7, 14, 19	flooring 101:1
52:6, 7 53:6	February	financial 5:12	Florida 128:10
53:25 55:1	162:13	9:3 22:8	flowing 10:1
55:20, 23	federal 9:9	49:14 61:12	focus 60:4
facility 4:22	90:13 109:7	109:25	follow 44:5
6:11, 24 7:7	112:19	115:15	follows 11:7
15:22 21:5			
24:2, 18			

150:11	172:11	21:4,4 27:21	69:21 72:6
foregoing	full 14:1 21:3	33:2,3,4,11	78:21 87:16
187:6	116:17	33:14 49:3	117:10,12
forensic 6:12	136:16 153:5	51:19 54:18	118:1,4,6
8:16 9:4	179:18	65:17 69:7	119:5 120:19
forget 123:8	full-time	107:6 116:22	122:24
139:8	136:10	152:18 153:4	124:18,22
form 89:13	182:13	155:18	126:25 127:3
109:20	fully 173:4	162:23	135:12
format 187:15	fund 4:25 9:25	163:17,19	139:21
former 184:10	10:10 104:6	167:15	143:10
184:22	104:9	170:21	147:11 148:8
forms 89:19	funded 8:15	172:16	148:12,17
91:23,24	104:17	173:18	159:17
92:3 141:17	funds 9:22	gifts 8:9	165:17,18
forth 110:15	10:5 101:18	Gilbert 1:19	171:19
110:18 187:9	101:24 102:2	10:19	179:16,24,25
forthcoming	102:7,18	give 6:7 12:18	180:2 182:4
186:8	103:5,8,9,14	13:16 19:22	God 20:8
forward 10:15	104:8,13	22:14 54:24	182:14
found 4:4,22	107:2	56:5,11	goes 20:15
7:14 9:17	further 4:24	77:25 89:9	109:18 175:3
19:1 110:8	181:18	89:14,22	going 6:7
112:25 122:7	183:17	93:13 146:16	11:13 16:5
160:21	187:10,14	149:11	19:13,14,21
169:17	future 186:11	172:20 177:3	20:7,9,22
181:13		177:4,5	21:3 24:10
four 77:21	G	180:23,23	32:24 43:18
134:11	gains 8:22	181:1	44:2,13,21
fourth 3:18	Galiotta 1:17	given 94:11	48:13 50:15
franchise 22:5	3:23 185:10	125:21	54:17 56:15
22:9 23:7	gambling 31:7	149:14	56:20 57:15
fraud 4:4	gaming 31:9	176:21	58:15 61:1
free 150:5	gauge 152:25	giving 170:20	86:10,16
182:19	gears 62:1	173:7 177:2	96:16 108:2
Friday 142:18	150:14	Glassboro	110:16 113:4
143:25	Gene 133:2	102:17	113:6 114:7
Friend's 27:10	general 11:18	go 11:14 17:14	123:19
27:12,20,22	29:13,14	18:19 19:23	129:23
28:8,11	87:17 152:16	20:1 26:8,23	134:16
front 110:6,11	generally	26:25 27:1,6	139:20,25
112:23	166:11	30:4 48:1	144:21 150:4
161:15	Genesis 25:12	54:8,14 55:3	156:10
162:10	25:15,22	56:3 57:14	160:15
169:16	26:7,9	57:23 65:15	161:14 172:8
171:22	getting 19:18	65:22 69:14	172:9 173:12

175:4 178:10	80:7,8,18,25	H 2:11 167:16	happens 149:10
good 3:2 10:18	84:5,7 94:11	168:14	happy 158:19
10:22,25	119:15,16,16	177:15	hard 36:5
11:1,2,10	119:19,23	H0015 166:7	152:25
23:4 37:14	120:2,8,10	169:21,25	179:25
48:10,15	120:20 121:7	170:15	184:18 185:9
126:6 155:1	121:14,15,17	171:15 172:6	head 139:10
goods 8:23	122:8 167:9	172:21,24	156:25 158:1
106:18	174:9,11,15	173:15 174:3	health 8:18
Google 51:14	174:15,16,18	174:4,17	15:20 31:8
51:16,18	174:21 175:8	177:2	62:8,15,16
gotten 16:6	177:3,3	half 50:3	62:17 130:19
36:3 73:11	groups 24:5,6	hand 71:21	138:17
grace 182:14	25:1,17,17	handed 97:9	150:22
Graceway 8:3,4	26:17 28:2,5	handle 36:17	169:18
8:8,20 10:7	29:17 34:1,2	63:11 66:9	hear 12:23
10:10 14:20	grow 8:20	66:10,11,24	14:3 22:24
14:21,23	growing 66:22	66:24 67:14	116:24
15:10 85:17	67:2 114:14	70:20 75:24	186:11
102:17 104:6	grown 57:9	76:20,25	heard 44:6
104:9,22	183:1	77:1 79:8,14	117:21
107:8 144:8	growth 67:1	handled 54:15	122:13
144:9,14,16	guarantees	65:10 66:17	128:13
144:17,23	48:12	68:1 86:2	148:15 176:4
145:1,8,10	guess 22:22	97:6 128:19	hearing 1:9
147:4,8,24	39:25 53:10	handles 38:22	3:5,8 4:19
148:6,17,21	69:14 73:6	52:22 55:9	5:3,22 6:2
148:23 150:7	76:7 77:21	65:6 67:24	6:22 11:15
150:11	79:19 81:3	71:3 75:25	12:14 13:8
Graceway's 8:6	83:6 96:12	76:21 79:19	122:2,3,19
8:15 85:18	103:6 111:17	79:23 82:2	185:5,20,25
103:16	130:18	180:10	186:10 187:7
Grand 20:3	140:22	handling 82:2	hearings
28:23 29:9	148:17	hands 36:7	185:17 186:4
grant 123:14	151:24,25	hangovers	186:7
great 18:12	158:14 165:8	18:11	heavily 18:3
grew 34:3	168:9 180:3	happen 30:18	held 3:8 6:3
grips 182:19	Guhl 7:16,23	119:14	help 7:4 20:15
gross 153:19	guidance 32:14	121:25	34:7,13
ground 16:6	Guided 183:9	138:21,22,25	43:13,15
group 22:8	guy 128:21	165:19	149:8 150:23
24:7 25:19	guys 57:7	happened	155:18,21
28:3,5 40:20	92:24 101:7	122:12	182:19
40:20,20,21	171:12	138:20 165:5	helped 4:24
41:18 43:3		happening	19:5 67:5
45:11,25		141:4	156:3 183:7
	H		

helpful 178:15	hour 45:25	3:20	140:11
helping 19:21	78:22 137:18	improve 185:22	indicator 9:15
22:12 38:3	139:25	impunity 4:11	individual
156:24	hour-and-a...	in-house	25:19 28:3,4
157:17	116:8	154:15	33:25 42:11
helps 22:18	hourly 160:5,5	155:15,16,19	42:20 43:3
HERETO 2:20	hours 40:16,17	157:14,20	45:4 46:4
heroin 124:15	40:21 45:3	163:8 165:9	53:18 116:2
hey 54:16 73:1	160:1 180:20	165:17	116:10,15,21
152:18	house 1:10 8:3	175:13	117:1 119:14
hi 131:23	18:19 27:10	inappropriate	119:24
hiding 18:23	27:12,20,22	4:10	120:10,17,19
high 51:1	28:8,11	incentivized	121:8 122:8
102:20,20,21	145:14,14,16	8:11	138:17 167:3
102:21	145:18,19,22	incepted 20:16	167:10 168:2
higher 6:20	145:23,25	include 141:14	168:4 169:24
7:13 50:21	146:2,18,22	168:2,4	170:2,10,14
51:8	146:24	included 7:22	172:1,9,19
Hill 4:18 6:12	houses 18:18	167:25	173:1,16
14:9 57:11	102:22	170:15 172:2	174:22 177:5
57:24 58:6	145:15	172:4 173:16	178:11 179:1
99:14 145:22	HR 39:22 93:7	173:22,24	179:3
146:5	hundred 176:17	174:10,13,14	individually
hire 50:6	178:5	includes 50:6	76:20 179:5
52:24 158:14	hypothetical	140:12	individuals
hired 33:3,4	147:14	including	183:7
36:21 115:17		50:13	industries
hiring 33:18	I	income 94:12	6:16
36:17 66:20	I's 163:5	102:8,9,10	industry 1:5
history 21:20	ICGC-II 31:7	102:10	2:16 3:6 4:2
hit 9:23 19:12	ID 2:13	104:19,21	4:12 6:3
hold 31:7 58:9	idea 98:15	incorporate	18:8,9 20:25
holding 48:5	identifica...	180:22	21:9,22,22
holds 58:11	161:24	181:14	22:2,2,3,16
home 8:20 18:6	identified 9:5	incorporated	23:9,16,24
homes 14:22	ignore 177:22	12:14	24:14 27:8
102:17,19	177:25	increments	29:14 109:6
144:9 145:10	ill-gotten	110:13	116:12 125:6
145:12,13	8:21	112:11	125:9,12
146:6,17	illicit 12:3	incriminate	182:23 183:5
147:1	impair 12:4	13:20	185:23
hope 19:23	important 5:9	independently	influence 12:3
Horizon 62:9	12:17 92:24	177:10	136:5
63:8 171:6	180:25	indicated 6:1	information
hospitaliz...	imposed 11:25	13:17 181:24	22:15 38:19
40:9	impropriety	indicates	49:15 69:18

71:4,14,21	62:22 66:5	169:2	124:3 164:24
72:5,10 74:8	99:3 103:5	interacting	166:6,12,16
74:13,22	104:5 107:3	36:8	167:1,2
75:9 89:9	114:3 122:10	interactions	168:1 174:9
126:8 141:17	122:25 123:2	34:16 35:4,7	174:9,10,13
144:24	123:6,8,14	interacts	177:3
160:14	123:17,21,22	169:8,9	issue 43:12
170:21	124:2,5,19	interest 3:20	72:23 98:1
initiated	124:20,25	interested	issued 5:7
111:5 162:11	125:3,17,22	187:13	11:16
inpatient	126:1,2,9,13	intern 24:3,13	issues 42:5
27:14 46:9	126:25 127:3	30:1,4	43:14 70:12
52:5,7 53:3	127:13	internal 23:1	72:24 153:1
53:6,21,22	130:20	70:4 76:7	153:4,8
input 38:19	131:13	115:14,16	176:5 185:21
71:14 74:22	137:13	163:8 166:1	item 7:23,23
inputted 121:4	138:17 149:2	Internally	177:11
121:9	149:6 150:3	163:19,20	items 106:17
inputting	150:22 153:6	internet 52:2	106:18
74:13 97:7	154:7 155:24	interning 24:1	140:16
97:11,15,24	162:15,20	30:8	177:20,22
inquiry 3:21	163:16	interns 30:13	
inside 154:11	164:23 165:2	introduce 3:12	J
instance 10:6	167:6 168:3	investigation	James 21:16
135:24	168:12,24	1:2 3:4 8:6	38:25 39:1,4
149:15	169:2,9,18	11:20 185:20	Janine 77:4,7
instances 9:5	170:11,20,21	Investigat...	129:5
41:22	170:23 171:8	11:21	January 162:12
institutions	171:19 172:7	investigat...	JBL 77:9
63:15	172:13 173:7	5:17	Jean 129:3,3
instructed 7:8	173:11 175:2	investigative	142:13,19,21
38:18 131:1	175:7,18,19	3:24 6:6	143:1,11,24
131:12	176:4,20	investigators	Jersey 1:1,11
163:14	177:9 178:23	4:19	2:17 3:6
instructions	179:14,19,23	investigatory	6:12 15:17
11:14	180:3,14	186:2	15:25 17:8
insurance 4:7	integrate	investment	26:14 30:15
4:23 6:14,18	149:9	8:24	48:22 62:24
7:5,13,17	Integrated	investors	81:10 132:16
8:13,14,18	22:8	49:19,19	132:22 182:6
9:23 10:5,9	intensive 40:6	involved 59:22	185:4 187:4
47:1,2,3,8	44:24 169:20	60:2	Jessica 35:23
47:19,25	173:15	IOP 19:5,6	35:24 39:6,7
56:9 57:1	174:20	44:24 45:20	39:23 133:12
62:4,8,14,15	interact 34:24	62:24 116:4	133:18,23
62:16,17,22	36:12 168:24	123:1,17,22	169:11

Jimmy 53:15	Karen 7:16	54:13 55:4	132:11,24
55:10,14,17	keep 110:21,24	56:5,17 57:3	133:8,13,21
55:22	111:2,2,20	57:10,15	133:24
job 18:12 21:3	kept 18:14,20	62:3,9 63:12	134:20,25
22:10 23:24	19:4,6,9	63:15 64:5,9	135:16,24
24:14 27:7	20:9 70:5	64:19 65:3,7	136:4,11,16
36:22 38:13	163:4	65:10,14,22	137:7,17,21
38:16 117:25	Kevin 1:15	66:18 68:8	138:1,5,7,12
128:13	3:14	68:10,13,21	138:15
137:22 185:2	killed 182:10	69:3 70:4,7	140:10,13,16
jobs 18:5 21:2	kind 19:17	70:21 71:8	140:25
22:1 23:3,8	32:3 33:5	71:11 72:16	141:10,14,15
27:24 28:8	34:6 36:21	72:18 73:13	141:18
147:19	50:13 81:13	73:13 74:2	142:24 143:6
182:14	127:16	82:10,13	143:7,23
Joe 20:11 86:9	129:24 130:1	85:6,13	144:14,15,18
89:1 101:2,4	164:20	87:21 90:11	144:22,25
John 3:18	171:15	90:12 91:22	145:2,8,9,11
join 3:15	Kingsway 4:17	92:6 93:4,18	145:11
joining 3:22	6:9,10,13	93:24 94:4	146:20 147:7
joint 68:5	7:12,15,18	94:22 95:2,7	147:11,18,23
79:16,20	7:19 8:2,7	95:12,15,16	148:1,6
101:21,23	8:12,15 9:20	97:15 99:3,5	149:1,1,3,4
103:11,19,23	9:23 10:6,8	99:8,10,13	149:7,8,11
104:18 107:5	10:9 14:4,7	99:22,25	150:3,4,5,20
108:1,3,12	14:8,12	100:7,11,13	151:6,8,13
110:9,16	15:14 16:20	100:15 101:8	153:6 156:7
113:4	16:25 17:7	101:19,24	156:8 157:21
jointly 90:8	17:10,19,21	102:11 103:4	158:9,11
Joseph 20:10	20:6,16 21:8	103:9,10,14	159:19 160:4
21:7 32:16	21:9 27:11	104:5 105:14	162:20 163:9
32:17 80:4,5	28:9,10	105:23 106:7	163:24
80:10 81:16	31:10,11,22	106:13,14,16	164:12,22
83:8,17,25	32:5,9,24	107:20 108:2	165:2 166:17
84:10,21	34:3,15,24	108:19 110:8	167:13,18
85:24 86:12	36:17 39:5	114:4 116:1	169:1,18
89:10 91:5	40:5 41:20	116:16,25	172:16 175:5
92:6 93:14	42:13 43:1,7	117:7,7	176:6 178:22
94:20,21	45:1 46:9,12	118:21	178:23 179:2
99:23 108:21	46:15 47:1,7	119:13,15,22	179:17,17
113:15	47:14,18,21	120:2,17	180:2 182:15
Joseph's 109:3	48:21 50:16	122:23 125:2	182:17,23
jump 44:2 77:3	50:23 51:2,9	127:19	183:3,7
jut 166:9	51:19 52:1,8	128:18,20	Kingsway's
	52:20 53:5,8	129:1 130:15	9:11 50:20
	53:20 54:1,7	131:16,19,24	63:18 67:13
K			

67:14,18,22	49:21 50:5	139:2 141:9	21:7 32:16
68:2,5,15,19	51:4,15 53:6	143:3 144:8	32:17 80:4,5
70:17,24	53:7,8,21	144:11,21	80:10 81:16
71:24 72:6,9	54:1,4,25	146:1,3,8,15	82:22 83:2,9
73:6 76:7,10	55:19,20	146:21,23,25	83:18,25
78:1 82:5,7	56:2,12,18	147:3,10,19	84:10,21
83:10,13,21	57:7 60:16	148:5,10,16	85:24 86:12
86:1,3 90:24	60:19,25	150:2,6,9,11	89:10 91:6
93:15 94:9	62:21,25	150:13	91:16,17,20
99:9 102:12	63:1,5,6,7	152:19,21,23	92:6 93:14
105:19 107:2	63:13 67:23	153:5,15,20	94:20,21
108:4 112:25	69:8 70:4	154:10,10,13	99:24 101:3
121:23 132:8	73:1,2,5	156:10	101:4 108:21
143:14	76:6 82:18	157:24 159:1	113:15
146:19 151:9	83:1 84:13	159:4 160:10	
155:24	84:15,16	160:13,20,21	L
156:20 157:7	85:18,20,21	160:21 161:1	L 1:19
160:11 163:7	86:7 87:2,16	163:4 164:22	lab 132:11
182:25	87:18 89:3	165:1,5,7,22	133:2,8
KIPU 33:17	91:25 92:1,2	165:24 166:1	134:7 135:2
38:9,12,15	92:4,24 93:5	166:4,12,17	135:6,15,18
38:19 56:1	93:8,20,23	168:7,9	136:7,8,10
121:4 131:3	94:20 96:13	169:9 170:8	137:12,17,24
135:12 154:8	96:18 98:3	170:17,23	138:2,5,8,13
154:11 164:7	102:2,7,18	172:8,14,17	138:24 139:2
knew 48:6 87:2	102:22	172:18 175:7	139:5,6
87:5 108:17	103:23 104:6	175:17 177:9	143:1
166:19	104:8,22	178:22 179:2	lab's 137:18
know 12:8,23	105:19 107:4	179:7,7	Laboratories
13:16 14:23	107:8,11,19	180:3,4,23	141:10,16
15:2,11 16:4	107:25	181:2,16	labs 132:22,24
17:25 18:2	108:20,23	185:21	134:11,12,13
18:17,24	113:2,7	knowledge 15:5	134:14,14,19
19:2,22,25	116:4,14,21	43:2 62:19	134:21
20:4,11,11	117:20,20,23	90:23 102:15	136:10,23
20:17,19	117:24 119:9	109:7,22	137:8 139:3
22:1 28:12	120:9 121:2	119:25	139:5 140:11
30:7,12,13	121:6,22	130:21	140:12,16,17
30:13 31:14	122:24	147:25	141:18,22,24
32:18 33:21	123:11,19	166:14	142:3
34:7 36:1,5	124:18,21	168:16	Lacey 3:18
36:7 37:13	127:11 130:3	knowledgeable	Lackey 1:15
40:25 42:9	130:5 131:8	159:6,12	3:23 184:5,6
43:22 47:25	131:9,11	known 9:6	Lackey's 185:1
48:1,12,19	137:22	133:5	lady 127:12
48:25 49:3	138:20,23	Kornicki 20:11	large 9:18

24:25	54:12 55:21	95:21 98:10	loans 22:18
largely 4:13	56:14 63:4	163:23	95:11 106:3
larger 9:7	63:14 78:12	176:22	106:6,9
Lastly 13:17	82:23 84:10	listen 122:3	local 158:18
laundering	93:14 94:4	little 7:1 8:9	located 6:11
9:15 10:12	95:18 105:11	18:24 21:19	25:13 26:12
Laura 6:13	117:6,22	22:15 28:16	28:14,24
8:16	118:3 123:7	37:5,10 40:4	132:22 146:4
Laurel 26:13	123:25	48:6 50:3	location 57:12
lavish 4:25	124:12,17	54:21 57:9	57:16 100:6
8:22 9:24	127:15	60:7,14 62:2	101:12
law 11:25	130:18 136:3	65:17 74:10	long 25:22
lawfully 5:7	136:5 149:6	74:17 80:5,6	26:20 32:5
lawyers 50:6	150:5 168:1	88:25 130:4	34:21 39:1
81:9	170:8 171:13	141:5 144:7	42:22 47:12
LCAD 31:5	172:21,22	150:19	47:14 50:1
learn 129:21	180:6	152:10 161:4	55:17 64:4
129:22,23	letter 143:21	165:6 167:16	64:18 80:10
130:3 175:20	151:2 160:24	live 18:6,20	82:7 97:14
learned 183:11	license 49:24	19:14,14	97:16,17
learning	50:2,7	185:18	123:21
163:16	187:20	lived 148:6	132:17
175:17	licensed 30:11	lives 183:14	longer 149:3,7
lease 99:25	31:4,5 48:21	living 8:3,4	150:4 184:21
101:8	49:4	8:12 10:10	look 61:4
leases 100:13	licensing 49:1	14:22 19:6,9	73:19,20,21
leasing 99:22	50:12	20:22,24	74:1 89:2
leave 20:25	life 19:18	102:16,19	110:10 113:1
26:22 35:24	20:20 43:19	104:6,10	127:2 130:22
leaving 36:2	52:18	144:8,9,14	134:3 149:12
134:15	life's 182:20	144:16,17,23	154:11
169:12	lifestyle 4:25	145:1,9,10	162:25
led 3:24 185:1	8:22 9:25	145:12,13	163:25 164:5
left 23:24	Light 15:16,19	146:16,17	164:7,9
25:4 26:8,9	16:9 17:2,7	147:5,8	175:3
27:5 28:7	Light's 101:12	148:6 150:12	looked 134:8,8
36:1 78:19	limited 162:14	Living's 107:8	looking 47:13
79:6	line 10:12	LLC 14:8 31:23	73:23,24
legal 1:24	146:14	32:10 161:18	95:14 123:10
43:12	176:18	loan 22:4,13	160:22 170:7
legitimate	177:11 178:2	22:17,18	looks 110:12
134:5	Lisa 1:18 3:24	23:6 95:18	142:12,17
Lending 22:24	184:12	95:22 96:15	161:18,25
22:25	list 55:22	96:16 97:1	162:9 169:19
lessons 183:10	148:20	97:22 98:1	170:3
let's 36:25	listed 95:18	98:11,22	loss 73:17,19

73:20,24	management	Matt 10:23	medications
74:2,5,7,10	15:17 16:1	MATTER 1:4	41:5 42:10
74:14,18	17:8 43:6,10	matters 11:12	44:10
75:20,23	43:21 45:17	MATTHEW 1:20	meet 7:4 36:20
lost 18:5,18	46:7 81:11	maximize 6:21	37:7
18:18,19	101:5 120:1	maximum 50:22	meeting 19:17
20:25	120:3,6	McDonnell	44:11,13
lot 18:3 22:23	122:9	53:15,16	58:12 148:24
24:4,4 25:8	manager 43:12	55:10,14	meetings 58:10
41:14 51:13	43:15 126:17	McDonohue	58:12,13,15
52:11 59:15	128:19	55:16	58:21,24
70:25 87:20	mandated 59:16	meals 8:9	59:2 131:16
100:25	manner 107:9	mean 33:24	member 117:22
180:21	107:10	38:2 43:9	118:2
loved 3:18	112:18 113:7	47:3 51:12	members 3:12
loving 19:7,8	113:17,20	53:10 60:14	10:19 116:25
lower 19:4	114:3 163:10	63:13 66:3,4	118:20,21
178:5	163:12	66:11 77:13	memories 6:5
LPC 31:4	175:14,25	80:14 81:22	mental 15:20
lunch 78:24	178:24 185:4	98:14 104:11	31:8
140:2	March 169:19	107:15	mentioned 21:6
lure 8:8	Marian 1:17	110:23,24	21:21 28:16
luxury 8:23	3:23 185:10	114:23	41:8 47:15
Lynn 157:23	marijuana	123:14	59:22 148:15
158:5,6,10	124:13	124:11	Mercandetti
158:11	mark 161:14	134:24 138:7	6:13 8:17
	marked 110:4	138:24 139:1	9:4,14,21
	161:24	151:25	10:10
M	market 51:9	155:11	Mercier 35:23
M 1:20	marketing	177:24 178:6	39:6,23
madam 181:21	51:11,13	meaning 9:22	133:12,23
184:2	52:1,20,22	106:18 156:2	169:11
Madden 156:18	52:25 53:9	Means 38:3	met 18:22
157:3,6	Marlton 25:13	meant 60:1	19:15
159:1	married 14:14	Medicaid 6:19	methadone
Madden's	18:25	47:5 48:1,4	24:16,17,21
161:19	Martinez 38:25	134:17	24:23 25:4,8
mail 89:13,16	Maryville 24:1	medical 24:22	26:4
main 37:20	24:13	25:5 33:3,15	mic 181:20
128:22	master's 20:2	33:15 38:10	Michelle 8:5
162:22	20:12 21:4	41:1 46:20	10:8 14:17
making 4:10,13	28:18 29:4	56:1 121:10	14:18 79:13
7:11 21:1	29:19,22	127:18 128:1	182:10,13,18
53:12 70:6	30:20	171:21	Michelle's
181:16	materials	Medicare 6:19	102:6,24
male 143:12,24	140:22	47:5 48:1	104:13,15,17
Malverne 52:18			

mid 18:20	152:19 154:3	motivated	nature 10:2
middle 119:16	180:5	182:24	navigate 61:6
119:19	Monica 157:23	move 59:4	near 9:20
million 8:17	157:24	87:21 114:8	110:13 113:8
8:24 10:8	monies 10:1	115:24	113:11
62:4,10,11	112:1 162:19	139:14	nearly 182:10
99:3 104:4	monitor 134:22	183:19	neat 20:3,7
mind 111:2	143:2,10	moved 182:10	necessary
minutes 7:1,1	monitors	movement 9:22	183:2,4
42:24 45:9	134:23	107:1	necessities
116:5,7	month 58:2,7	moving 81:3	8:10
169:24	74:3 84:25	134:17	need 4:9 8:10
Mirmont 52:18	85:11 86:14	157:13	11:12 12:2
misconduct	86:15 92:8	Mullica 4:18	13:14 29:18
182:21	92:10,12	6:12 14:9	44:7,14,18
missed 180:25	100:9,21	57:11,24	50:14 78:23
mission 31:11	101:8 109:15	58:6 99:14	138:18
31:18 182:18	109:21 126:4	145:22 146:5	139:18
183:11	154:3,4	multiple 4:20	146:15
mistake 96:1,2	160:15	9:5 10:3	151:25
96:4 98:12	monthly 58:9	77:16 136:14	needed 23:1,1
modalities	84:4,11,22	145:12 175:3	43:24 49:5
20:13	84:23 153:13	177:14	50:6,7 67:3
model 125:14	153:14 160:7		92:17 111:17
moment 20:8	months 26:21	N	162:24
139:21	35:25 39:3	N 1:16 2:1	needs 41:25
Monday 142:17	55:18 58:3	name 14:1,16	53:8 54:14
144:1	70:2 97:18	35:10 52:16	70:5,5
money 9:15,23	97:20	67:23 68:6,6	121:13
10:3,5,6,9	months' 98:25	68:6 77:6	122:24
10:12 50:5	morning 3:2	128:23 129:4	nefarious 9:16
62:3 67:14	10:18,22,25	136:13 139:2	negotiate
67:21 68:4	11:1,2,10	139:4,8	180:6,8
69:21 70:11	137:18	151:16	negotiations
86:3,7,10,11	Morris 10:20	156:25 157:4	180:10
86:18 87:3	10:24 16:4	157:24 158:3	neither 125:7
87:11,21	80:22 81:2,5	158:6 161:19	187:10
95:6 99:4	91:7,10,11	named 100:3	network 47:7
100:15	91:18	128:21	47:11,14
101:17	Morris' 80:8	names 126:16	167:5 172:12
103:19,22	mortgage 18:8	128:25 129:3	175:21
104:1,6,9	18:15 21:22	139:7 151:21	never 59:1
107:5,6,7,13	22:1,3,16	156:22	72:15 90:6
107:20,24,25	23:8,16,24	narcotic 136:5	102:13 117:4
108:2,9,11	105:7 109:6	national	117:21
108:18	motion 5:4	129:25	119:19

120:13	44:5 121:12	131:19 157:7	once 30:8
121:16 127:5	121:13	Oh 66:7	42:21,22
127:5,10	135:21	okay 18:23	45:7 57:7
131:9 153:21		20:21,22	58:1,7,25
new 1:1,11	O	24:16 26:9	70:2 74:3
2:17 3:6	O 1:14	27:5 31:14	76:12 81:23
6:12 26:14	oath 12:2,8	31:18 38:1	82:1,4 84:8
48:22 62:24	13:18	42:19,22	84:8 86:14
97:8 122:25	oaths 187:5	44:22,24	86:15 92:8
124:24	objectives	47:1 48:21	92:10,12
132:16,22	183:3,6	52:7 54:11	97:24 126:3
182:6 185:4	observations	55:25 56:16	126:4 130:7
187:4	125:16,19	59:1,4,14,15	132:2 136:17
nice 67:7	obtain 48:25	59:17,21	156:13
Nicholas 2:5	obtained 4:23	61:7 63:6,11	165:16
4:16 8:4	8:19	64:2 66:11	175:12 179:4
10:15 11:6	obviously	66:16 67:2	184:8
14:2	180:19	67:17 68:1	once-a-month
night 34:2	occurred	70:3 71:4	86:21
136:19 137:3	143:15	72:24 74:12	one's 121:16
137:19	occurring	75:11 78:25	one-on-one
nitty-gritty	121:17	81:1 83:8,17	42:20
121:25	122:17	86:18 87:4	one-on-ones
NJ 187:15	occurs 4:11	87:11 92:21	25:18 26:17
non-pay 56:8	October 3:8	96:25 97:10	ones 3:18
56:11,16,17	4:19 6:3	98:24 99:2	47:10 52:12
56:20 57:1	14:5 17:20	100:2,9,18	52:13 63:1
149:12,14	122:4	102:25	146:19 171:3
non-private	offer 46:9,13	115:13,22	171:5,5
59:22	46:15 56:9	123:13,16,25	online 96:10
normally 87:13	149:4	124:17	185:17
North 101:10	offered 36:22	126:14	open 17:19,21
notes 164:9	56:2 116:1	127:15	20:14 21:8
Nova 22:7	121:23	136:20,22	49:19 57:19
November 17:20	149:25	137:5,14	68:2 99:24
142:3	offers 40:5	141:7 142:2	132:8 162:14
number 46:1	43:7	142:12,23	opened 21:5
57:6 98:14	office 53:2	143:13 151:3	28:9,10
100:18	57:17	156:6 164:22	32:24 150:20
111:22	officer 22:4	165:7 167:19	opening 21:9
144:11	22:17,18	171:9,15,17	33:6
181:12	23:7 61:13	171:23 172:6	operate 182:22
nurse 7:4 41:6	officers 22:13	172:23	operates 16:21
44:14	offices 57:11	173:14 174:6	16:25 17:2
nurses 44:7,17	57:12,16,18	176:8,11	102:17 148:3
nursing 43:3	65:19 131:19	old 17:24	operating

102:13 127:6	119:23 120:3	oversees 35:14	60:2, 5, 8, 11
operation 3:9	130:22	41:17 116:19	60:19 94:15
35:15 80:6	138:16 186:6	oversight	paramount
80:14	ordinarily	183:4	182:24
operational	73:8	owe 180:5	parents 18:6
37:22 49:8	origin 10:4	owed 153:6	18:20 19:7, 8
68:21, 22	origination	162:20	parents' 20:24
117:16	19:10	owned 100:3, 6	part 27:9, 20
operations	out-of-net...	105:24	37:20 38:13
4:25 8:15	47:19	owner 4:17	53:9 64:21
9:25 34:17	outpatient	14:7 15:22	104:4 117:25
34:18 36:9	4:17 6:11	16:17 99:20	122:18 123:3
36:12 37:1	15:20 27:14	99:23 100:12	140:19
37:19 39:8, 9	27:15, 17	owners 14:11	162:18
39:14, 16, 20	40:6, 7 44:25	16:22	163:22
39:24 40:2	45:24, 25	owning 15:10	partial 40:6, 9
58:11 61:10	46:16, 21	17:7	40:10, 12, 13
61:18, 20	169:20	owns 14:24	40:18 42:12
68:18 70:9	173:15	16:20 17:1	43:1, 20
70:10, 16	174:20	144:9	44:25 45:21
116:18	outside 6:15	Oxford 145:15	116:3 123:8
118:13 121:3	14:23 15:10	146:6 147:1	123:9, 15
121:21, 22	17:6 46:22		124:1, 6, 13
122:14, 21	46:23 52:24	P	124:21, 23
149:18, 19	64:25 67:17	P 1:16, 16	164:24
151:10 160:3	72:17 81:8	P-e-r-a 35:13	particularly
168:20 169:5	82:17 84:16	p.m 142:18, 18	114:11
170:19 171:8	109:3 126:24	143:25, 25	parties 187:12
183:1	155:16	144:1 186:14	parts 37:21
opinion 133:16	outstanding	packet 89:13	pass 114:7
opioid 124:18	185:2	PAGE 2:3	183:23
opportunities	overall 76:6	pages 12:13	pastor 20:5, 9
56:12	76:10	paid 26:2, 5	patient 5:13
opportunity	overcome 4:9	27:21 62:23	6:20 7:21, 21
5:11 12:19	183:8	63:1, 9 78:1	40:8 43:15
13:7, 16 14:3	overlapping	78:4, 5, 9	45:22 46:2, 3
180:23 181:1	7:2 122:12	172:16	54:14 56:20
181:24	overpay 177:6	178:23 179:3	117:7 118:24
opposed 140:2	oversaw 35:21	179:3, 13, 17	119:11
177:10	61:10	179:20 180:5	125:20
opting 140:1	oversee 35:15	panel 5:6, 21	130:23
options 54:25	41:16 116:19	Paper 68:24	135:24 149:2
55:3 56:3	138:2 151:1	paperwork 48:4	169:22 170:9
149:13	151:5	49:11, 22	patient's
order 53:7	overseeing	50:1, 14	125:6
112:18	156:7	59:22, 25	patients 4:5

8:3,11 33:20	40:11 42:12	79:11,23	pints 18:17
33:23,24	48:20 56:15	80:3,11 82:4	19:2
40:19 41:20	56:17 77:16	84:1,20 85:3	place 49:4
42:25 43:20	122:7 126:18	86:2,4 87:3	139:22 181:8
44:13 66:6	129:1 136:4	87:22 88:1	187:8
116:1 120:18	136:15,19	89:10 90:1	places 18:1
134:25	156:4 163:9	91:17 92:20	23:12 147:20
135:16,23	169:10	95:17 99:16	plan 20:17
143:6 146:19	Pera 34:20	99:19 101:16	53:9
146:19 150:2	35:11,13	101:17 102:3	planned 3:15
162:16	53:19 151:17	102:5,6,24	plans 87:14
182:25	percent 154:1	103:10,20,23	platform 186:3
pay 4:8 6:19	percentage	104:2,13,15	Please 182:17
59:8,11,15	144:20	104:17,25	plus 168:11
59:23 62:17	153:17,18,22	105:2,4	PNC 63:16 65:2
62:19 77:19	153:25	106:17,18	point 13:11,13
84:21 85:7	perform 18:4	107:4 108:19	19:11,12
106:2,5	performance	110:9 113:1	20:23 22:12
111:17	153:9	113:6 114:19	25:10 58:23
114:23	performing	115:2,3	59:5 78:12
123:17 124:2	159:18	152:17	78:23 88:16
124:5 137:8	period 97:11	183:10	90:21 93:23
137:17	98:25 122:25	personally	98:8 100:12
153:12 160:4	124:24	57:14 81:20	100:19
162:21 173:6	162:12	118:22	105:17
173:12 175:7	163:23	119:10 131:1	111:25 114:7
175:9	perjury 12:10	168:23 169:1	115:24
payable 71:1	person 20:1	179:13	116:21 124:4
73:7	22:19 37:4	180:12	128:22 132:8
payable/ac...	54:23 55:5	Ph.D 21:4 29:7	133:17
73:14	61:10 76:13	29:8,12,14	134:15 136:6
paying 56:25	77:18 118:13	30:20	140:3 149:10
57:1 62:9	123:20 124:2	phlebotomi...	152:4 154:14
100:7,15	124:12,14,17	140:15	160:19 161:1
154:4 174:15	126:20,21	Phoenix 28:25	163:8 165:17
payment 59:12	137:5 141:8	29:1	167:8 176:8
175:5	146:14	phone 22:23	177:6
payments 8:14	156:23	37:3,8 70:1	points 24:10
100:16 114:4	person's 55:21	75:6 76:14	policies 47:19
123:2 162:14	61:16 125:19	76:15	49:5,12
payroll 93:3,6	136:13	PHP 40:9 62:24	62:17,22
93:12	personal 9:12	63:4 123:1,8	63:7,8 70:4
pays 137:5	9:21 10:1	166:13,16	policy 20:18
people 15:8,8	32:4 49:15	picked 134:11	49:2
19:22,23	67:22 76:19	Pike 99:14	portal 135:11
24:4 36:20	76:23 79:7	100:24	position 36:3

possible 183:12	previously 13:17 110:4 180:21	proceed 3:2	116:16
potentially 60:21	print 71:21	proceeding 3:7 5:9 6:7	proud 183:9 184:9,18
power 5:17 35:12	prior 5:21 13:8 21:9,20 21:20 29:23 32:8 35:21 39:4 48:15 55:14 64:7 64:13 66:16 69:7 70:6,8 71:10 72:12 86:8 88:19 89:10 90:24 91:2,20 92:2 93:11,15 94:1,20 97:2 97:7 100:2 109:21,21 132:20 133:24 134:12 159:2 161:1 165:1 169:11	proceeds 4:23 8:18 99:3 103:5,6 104:5	provide 12:5 73:4 81:19 82:11 84:15 119:23 120:3 134:20 140:13 142:13 147:2 149:8 158:15
Powerpoint 2:14		process 143:3 143:5 146:11 163:18,19	provided 5:21 6:8 40:23,24 74:4 94:3 117:9 120:7 140:12,20 143:20 161:16
PPC 51:14		professional 31:5 181:15 182:1	provider 123:6 providers 47:8
practice 9:6 9:18 41:6 117:1 175:11		profession... 184:14	provides 150:11
practices 4:4 4:22 5:13 7:8,15 8:19 151:2 160:22 182:23		profit 73:17 73:19,20,24 74:2,4,7,10 74:13,18 75:20,23	providing 31:12,13,16 81:11 94:2 140:16,25 164:12
Pre 165:8		profits 6:21	psychology 29:13,16
prefer 6:18		Profitt 157:1 157:9,15 159:7 161:10	psychotherapy 169:24 170:3 170:10,14 172:1,19 173:16 179:1 179:3
preliminary 11:12		Profitt's 157:10	psychotropic 42:9
premises 138:2		program 20:12	public 1:9 3:5 5:3 6:2,22 11:14 184:7 185:17,20,24 186:4,6 187:7
preparation 83:21 84:12		progress 7:12 125:3,3 130:19,21 131:2	
prepared 91:6 91:13,14 94:12		progressing 18:14 124:3	
preparing 184:14		prompted 5:4	
prescribe 44:10		prone 185:24	
prescription 12:3		properties 99:5,6,11 105:9	
prescriptions 42:3,4,7 44:7,14,18	probably 25:9 97:12 126:5 160:13	property 16:24 17:1 99:21 99:23 100:12 101:5,14 102:14	pulling 75:9 80:5,13
present 3:21 13:3 58:14 58:20,24 69:18 131:15 131:18 138:5 138:6 143:13 181:11	problem 17:24 176:2	protocols	pumping 8:23
pretty 20:3,7 24:15 31:19	problems 152:9 152:11 172:15		
previous 185:5	procedure 11:22 169:21 169:22 170:3		
	procedures 20:18 49:2,6 49:12		

purchase 70:6 99:4, 5, 10, 13 105:14, 20, 23 106:17	114:8 115:20 115:21 129:18, 20 139:15, 16 140:9 150:15 150:18 152:15, 16, 18 152:18, 20 176:14 178:17, 20 180:17, 21 181:12, 18 182:2	reach 160:3, 20 reached 98:4 161:2 171:8 reaching 160:11 read 11:13 12:24 144:3 162:9 163:22 181:23 ready 3:1 Real 16:14 really 18:16 18:25 19:1 20:16 34:25 36:11 46:24 48:5 52:15 60:22 61:1 73:9 88:21 88:24 89:21 90:5 110:22 152:13 153:3 171:10 Realty 99:20 99:20 reason 18:8 108:6, 7 110:22 162:18, 22 reasoning 26:24, 25 Rebecca 34:20 34:21 35:9 35:14 36:25 39:13 53:19 56:21 61:17 66:9, 10 76:8 76:9 151:10 151:12, 15 157:1, 8, 10 157:15 159:7 160:19 161:10 recall 26:5 48:24 49:17 49:18 50:2, 4 50:8 52:16	63:10 70:15 77:18, 24 84:25 85:7, 8 85:25 91:23 94:14 97:21 100:7 106:10 106:22, 23, 24 111:24 112:6 113:9, 13, 18 133:22 139:11 156:22 recap 5:20 receivable 73:7, 15 153:2 158:12 162:14 receive 6:24 42:17, 20 45:4, 17 46:4 52:5, 8 54:1 116:20 162:3 175:6 received 4:5 8:15 10:9 49:24 66:18 161:20, 21, 24 162:1, 15 183:20 receives 45:20 65:14 receiving 40:19 42:12 43:1 52:16 117:8, 9 recess 78:15 recognize 185:7 recollection 141:7 recommend 60:21 recommended 24:19 59:9 149:20 recommending
purchased 99:7 99:15, 17, 18 101:15 102:14, 19, 23 105:1, 6, 10			
purchases 69:2 106:12			
purchasing 100:2			
purpose 178:9	quick 44:3 78:13 83:8		
purposes 60:20	QuickBooks 69:15, 15 71:3, 5, 8, 11 71:14 72:2, 6 72:10, 14, 19 74:24 83:7, 9 83:10, 13, 20 89:25 90:3, 4 94:17, 18, 21 96:11, 13, 17 96:23 97:4, 6 97:11, 15, 24		
pursuant 5:7 11:17 187:5			
put 19:5 33:4 36:6 71:5 143:19 144:3 144:5 184:14 186:6			
puts 109:19 126:11	quote 7:25		
putting 37:24 51:22 184:7			
Q	R		
quality 4:7	R 1:14, 15, 16 187:1 R. S. 41:2-2 187:5 rampant 4:3 ran 22:4, 9 24:7 25:1, 17 26:17 59:1 87:13 rapid 9:22 rate 6:20 7:13 160:5, 6 178:5 re-engaged 19:19 re-sign 154:25		
question 12:8 12:22, 24 13:21 44:3, 4 59:8 61:8 65:23 68:18 102:4 115:14 129:15 141:6 152:12 159:25			
questionable 4:21 7:15, 24			
questioning 11:11			
questions 5:2 5:11 12:13 12:15 59:6 60:22 61:24			

134:2	107:20 114:4	regarding 6:9	relationships
reconvene 6:1	116:1 119:22	76:10 152:12	53:6,20
78:14 185:16	120:2 131:24	162:13	relative
reconvened 3:4	140:13,16	regular 37:19	187:11
reconvening	141:14,15,18	regularly 9:19	ReliaBill
4:15	143:23	41:23 131:22	33:13 127:9
record 12:19	144:14,18,22	regulations	127:11,15,16
14:1 78:14	145:2,8,9	109:7	127:17,25
78:17 139:19	147:18 148:7	regulators 9:3	128:1,9,12
139:21,23	163:24	regulatory	128:17 129:1
142:22	164:23	60:21 183:4	129:8,10,19
143:19 144:4	167:13	rehabilita...	130:9,11
171:25 181:9	169:18	1:5 2:16 3:6	150:20 152:5
181:23	Recovery's	4:12 6:2,16	152:7,8
records 7:17	92:7 95:15	6:17 185:23	153:9,12,22
7:24 9:1,2	95:16 103:9	rehabs 3:10	154:4,7,20
33:4,15,16	103:11,15	reimburse	155:19 161:7
38:10,12,15	110:8	178:2,4	161:8,11
56:1 71:25	recovery-b...	reimbursed	162:24 163:1
72:5 73:18	25:11	172:23,23	163:10 164:1
74:20 95:15	recurring	reimbursement	165:9,11,20
95:15 98:11	117:1	173:13	172:10 177:1
121:10 164:1	recused 3:21	176:17,21	ReliaBill's
164:2 165:23	red 9:1	reimburse...	130:16 163:3
171:21	refer 56:15	179:23	163:11 164:2
172:10	123:9 133:14	Reina 1:15	165:23
recovered	144:17 145:9	3:14 150:18	remain 4:13
182:16	referenced	178:17,18	remarks 184:5
recovery 4:2	60:1	185:10,12	remember 30:16
4:18 6:9,10	referrals	reiterate	49:10,22
7:10 14:5,8	54:15,22	184:25	73:10,11
14:8 15:9,14	146:9	relapse 19:10	89:19 93:12
17:19,22	referred 55:21	123:1 124:4	93:15 94:7
24:10 31:23	76:3 80:6,17	124:10,24	97:17 113:14
32:5,9 34:15	referring 54:3	relapsed 132:1	114:23
34:24 36:18	54:4 125:13	relapses 54:8	128:15,23,25
40:5 42:5	141:13	122:23	129:2,4
46:18,24	166:15	relapsing 19:6	136:14,18
48:17 62:3	refers 144:16	related 14:4	139:4,7
63:12,15	145:8,11	42:4 70:13	142:2 155:5
65:7,22	refinancing	relating 49:15	155:6 156:25
90:11 93:4	22:19,20	92:6	157:25 158:6
95:7,12	refresh 6:5	relationship	remote 29:2,3
101:19,24	refuse 13:21	53:11,12	rendered
105:14	regard 156:5	61:16 144:13	162:17
106:14,17	183:3	144:15	163:24

179:12,24	request 162:4	90:25 91:6	177:19
Renewed 15:16	162:6	91:18,23	rights 11:23
15:19 16:9	requirements	93:3,6,16,21	road 23:3
17:2,7	9:9 61:9	94:4,10,12	102:20
101:11	112:19	revealed 7:17	role 15:22
rent 8:9 100:7	113:23	8:6	32:25 34:4,4
100:16,24	requisition	revenue 153:19	35:18 38:1,8
104:12,15,22	141:16	review 7:16,24	147:4 150:25
RENZI 1:24	reside 144:22	38:12 69:2,5	151:1 156:6
rep 143:6,9	150:6	69:9,13,16	Roughly 26:1
repayments	residence	72:8,13,18	round 9:19
95:18,22	105:1	73:14 88:20	route 15:3,4
97:1,22 98:1	resident 148:5	88:25 89:4,5	15:11 48:2
98:11,22	residential	91:2 125:5	145:6
repeat 12:24	24:2 46:19	125:21,24	Rule 187:15
50:9 102:4	residents 8:7	126:10,12,14	rules 30:12
123:3 139:2	8:14 150:12	126:17,24	run 8:4 56:22
149:5	resolution	127:11 130:8	116:17 150:3
report 39:11	11:17	130:11,13,15	running 23:7
53:18 76:5,8	RESOURCES 1:24	133:16	28:1 29:17
76:9 109:10	respect 44:5	135:15	86:25
109:14 111:5	respond 5:11	163:10	runs 124:1
111:11 125:2	responsibi...	179:13,16	145:23,25
126:13	11:23 141:12	reviewed 12:14	146:2 149:2
138:16 186:8	141:14	38:15 72:9	149:6
reported 39:25	responsible	72:15	Ryan 55:16
70:11 117:4	150:21	reviewing	
118:13	restrictions	74:20 135:18	S
125:16,17	11:25	162:16	S 1:16 2:11
135:9	result 119:8	165:23	31:24 32:1,2
reporter 1:25	results 51:20	reviews 126:23	32:6,12
13:19 187:3	135:9,15,19	126:25 127:3	salary 17:10
reporting 9:9	resume 7:4	127:10 128:2	17:12 21:1
61:9,16	retain 155:7	130:12	26:18 36:4
130:19,20	155:11	131:13 164:5	115:8,11
172:5	retained	right 3:13	sales 23:2
reports 39:17	162:19	13:22 16:4	sample 136:6
39:19 61:17	retrieves	19:22 32:23	137:13
61:18,20	65:15	47:13 56:14	samples 7:9
116:20 131:2	return 8:12	80:9 96:6	131:25
representa...	returns 83:14	100:14	135:23
13:11	83:16,22,23	114:20	136:17
representing	84:16,17,18	137:14	138:16
185:3	88:1,15,20	156:25	Samuels 158:3
reputable	89:11 90:9	166:12	satisfied
134:8	90:12,13,22	168:13 174:3	13:10

saving 183:13	172:25 177:4	171:14,17,20	120:4,6
savings 95:9	screening	sending 172:6	121:12,13,23
saw 48:5 98:6	169:23	sense 37:5	122:9 134:20
saying 44:14	scrutiny 9:3	87:22 96:3	137:8 140:12
72:3 96:25	SDX 132:13,14	96:11 98:16	149:4,8
111:6 147:22	132:17,20	108:14 112:9	162:17,17
158:20	133:4,14,21	152:1 166:17	163:23
171:12,23	133:24 142:7	166:19	164:12,21
172:4 173:5	142:12 143:6	sent 124:15	165:12,15
174:24	143:8,18,21	141:21	167:21,22,23
177:21 178:5	143:22	separate 75:3	167:24
184:24	search 51:20	75:14 147:17	168:11,14
says 141:12	second 15:24	165:14 167:6	169:16 170:6
162:10	176:21 178:2	167:7,8	175:3 177:14
175:21	see 41:1,3,4	177:14	179:11,24
184:22	41:19,25	separated	session 7:3
schedule 44:20	42:2 44:21	168:15 172:3	24:7 42:20
91:24	59:5 78:22	172:4	116:9 119:16
scheduled	110:6,10	separately	119:16,17
44:10	111:3 113:1	177:21,22	121:18 167:3
schedules	114:7 122:18	separating	172:1,9,19
120:16,17	122:19 134:4	165:20	173:1,16
scholarship	146:15 162:7	172:11 174:2	174:9,11,13
56:7,16	168:13	174:2	174:18,21,22
150:5	169:19	seriously	175:8 177:5
scholarships	171:20 174:4	182:21	sessions 6:25
56:5	175:3 177:13	service 122:11	33:25 42:12
school 21:3	177:14 178:2	129:13	46:5 116:2,4
30:5	179:10,10	140:10,20	116:10,15,17
SCI 4:1,19 5:1	186:3	141:3,13	116:22 117:2
5:11 6:8,12	seeing 33:20	171:16,20	118:19
6:15,22 7:6	33:22,24	177:12 180:7	119:14
7:16 8:2	43:21	services 4:8	120:11 121:8
122:7 185:6	seen 127:7	7:2,6,13,19	121:9 122:9
SCI's 3:5 6:2	142:20	7:20,22	set 22:18
Scientia 133:3	148:20	25:12,15,23	27:10 32:18
133:6,10,14	185:22	26:7 40:5,18	41:4 46:1,15
133:24	sees 168:12	40:20,24	46:16 107:10
134:13	self-employed	42:25 43:6	116:9 118:16
136:25 139:7	74:18 75:5,8	43:10 44:6	155:5,15,18
142:7,16,23	self-pay 6:14	45:18 46:7	182:19 187:9
screen 110:5	47:21 103:5	46:10,16	sets 20:14
110:11	107:3	81:19,21	setting 33:10
112:22	send 3:16	82:11 85:1	43:16 157:13
161:15	127:12,13	115:25,25	seven 18:11
169:15	141:15,18	117:8 120:1	26:21 39:3

182:11	93:12 142:2	solely 182:24	102:6 103:4
severity 124:9	Silverstein	solutions 2:18	104:19,20
Sharhonda	64:15,18,22	31:12,13,16	South 15:17,25
126:16	64:24 69:10	52:18 54:2	17:7 81:10
Sharondha	69:12 70:1	150:23,25	space 134:17
126:24	71:12,13,22	155:17,20	span 8:21
She'll 76:8	72:12,17,22	156:7,12,14	52:15
sheets 73:18	73:4 77:5,8	156:19	speak 13:15
74:14	77:10,11,20	158:15,24	69:25 82:20
Shield 62:10	82:21 83:18	159:18 160:3	82:21,22,24
63:8	97:2,7,9,25	160:4,12	83:1,19 86:7
ship 141:9	similar 142:6	161:17,18,23	86:12 130:6
shipping	simply 51:22	162:19,25	156:9,11,14
140:14	53:22 174:18	163:25	164:11
Shoova 145:21	single 42:16	somebody 41:25	speaking 83:3
146:2,5,24	52:10 136:20	54:6 55:6	83:4,18
shop 20:6	sit 184:8	64:8 70:6	92:25 170:18
short 6:25	site 137:18	76:21 77:15	speaks 170:19
8:21 97:16	142:13,16	112:10	specific 54:15
116:15,22	157:6,8,11	123:25	61:2 87:24
117:2 118:20	157:11 159:8	129:16 136:3	87:25 93:1
shot 173:8	Sitting 3:13	137:2 142:13	166:9 171:5
shoulders	situation	156:11 158:4	specifically
184:16	182:12	160:20	22:3 47:25
show 185:6	six 8:20 26:21	170:22	50:10 91:22
showed 20:17	39:3	somebody's	specimen
showing 7:17	skill 20:14	56:9	141:24
171:22,25	slave 182:7	someone's	specimens
shown 175:25	slides 2:14	149:6	141:16,18
shows 74:18	small 27:3	soon 9:22	spending 73:2
sick 18:3	33:22	sorry 17:13	spent 25:7
side 49:7,8	smaller 9:8	21:18 27:16	50:5 69:21
sign 88:22	smoked 124:12	47:12 61:11	70:11
89:2,3,6	snapshot 73:5	68:6 69:23	spiritual
90:25 133:20	sober 8:3,4,12	83:9 91:23	59:19
153:20,21	8:20 10:10	94:10 99:5	split 30:17
signatory	102:16,19	125:9 129:2	spoke 86:9,15
63:17 65:4	104:6,10	139:1 177:18	86:17 93:6
signature	107:8 144:8	181:21	99:23 108:20
63:22	144:8,9,14	sort 59:11	108:24,25
signed 93:10	144:16,17,23	61:12	170:19,24
154:22 155:1	145:1,9,10	sought 182:22	sponsor 19:15
155:3,4	145:12,13	sound 62:5,11	Springs 26:13
significant	146:15,17	souder 178:13	stabilization
3:9	147:5,8	source 101:18	46:21
signing 91:2	148:6 150:12	101:23 102:2	Stacy 63:24

64:4, 7, 13	25:11 34:6	stepping 34:6	6:7 10:14
65:8 66:9, 15	95:2 127:7, 8	stole 182:8	supervise
66:16 67:18	127:9	stop 23:11	134:22 143:3
69:6, 7 70:23	starting 17:23	58:25 111:25	143:9
71:7, 10 72:8	27:10 88:6	152:7	supervises
72:12 75:18	124:5	stopped 19:17	134:23
75:21, 22	state 1:1, 10	19:18 152:5	supervising
76:5 82:23	1:10 3:3, 11	152:8	138:9 143:5
83:3, 5 93:6	4:3 11:21	street 1:10	supervisor
staff 33:4, 18	14:1 48:22	20:6 101:11	24:17 30:4
56:11 58:10	49:11, 25	102:20, 21, 21	supervisors
58:12, 20	50:2, 14 76:6	stresses 46:23	21:13 48:9
116:25	76:10 90:12	strived 183:1	48:15
117:22 118:2	113:23 134:9	structure	supervisory
118:20, 21	185:3 187:4	81:12 159:3	31:8
126:7 131:2	stated 116:25	structuring	supplies 68:25
131:12, 16	153:24	9:7, 14	69:1 140:14
135:21	160:25	109:24	supported
142:24	statement	struggle 183:8	184:17
148:24	11:18 12:19	student 106:3	supposed 6:24
149:12, 20	31:11, 18	106:6, 9	30:18 42:23
184:9, 22, 24	74:7 180:24	182:13	54:8 117:10
185:1 186:2	181:5, 22	stuff 20:18	117:10, 12, 19
186:3, 5	182:2, 3	22:24 40:11	118:1, 14, 15
stand 184:16	statements	68:21, 22	119:1, 7
standard 30:17	73:17, 24	101:1 127:12	sure 16:15
43:23 116:11	74:2, 5, 25	180:1	21:17 27:16
116:12	75:12 89:23	subject 11:19	28:13 32:11
132:10	94:13 115:15	submit 50:14	41:21, 22
standards	status 56:20	78:3 135:25	47:16, 17
125:6, 10, 13	Statute 11:21	submitted	50:25 55:24
Star 22:7	11:24	12:13 49:25	56:4 57:22
start 20:7	statutory 5:15	76:16 177:11	66:14 68:17
23:15 30:6, 7	stay 15:9	179:17	70:8 71:6
46:24 50:12	124:23 149:3	180:21	82:25 87:1, 4
63:14 82:23	149:7	submitting	89:24 93:22
93:14 95:7	stayed 57:6	88:19	99:1 101:6
95:11 99:25	staying 145:1	subpoena 5:8	102:12 103:2
114:11	stays 8:13	11:16, 18, 20	118:12 119:8
120:20	steadfast	subpoenaed 5:1	120:22, 22
124:20	183:11	successful	121:5 123:11
127:20	stenograph...	48:13	127:23
start-up 50:13	187:7	suggest 48:15	132:15
started 16:15	step 36:21	suggesting	137:16 141:1
18:17 19:18	123:5 168:10	176:18, 20	141:2 145:24
20:19 24:17	183:23	summary 5:22	149:16

151:21,24	taken 7:3 12:1	83:14,16,22	tenured 25:9
154:2 159:3	12:7 13:18	83:23 84:5,7	term 109:24
162:2 163:5	78:15 119:22	84:16,17,18	110:1 164:16
164:6,8,10	120:10	88:1,15,19	166:22
166:8 168:7	121:13 122:8	89:10 90:9	terminology
173:4 174:12	135:23 138:4	90:12,13,24	40:11
surface 60:22	141:21,23	91:6,23,23	terms 33:19
surprise 98:18	187:7	92:3,13 93:3	35:1 53:25
98:21,23	takes 135:6	93:6,15,21	56:9 62:2,14
116:24 117:3	136:6 139:22	94:4,10,12	65:2 67:12
suspicion	181:8	113:23	67:21 70:4
136:1,2	talk 35:9	taxes 81:23	70:19,23
switch 62:1	36:14,14	82:1,5,15,16	76:6,19
134:13	37:8 81:15	82:17 83:6	79:13 81:15
150:14	84:11 86:15	84:12	83:17,24,25
switched 32:12	115:25	teaching	86:1 90:11
sworn 4:20	117:16	159:12,14	92:5 99:2
11:4,6	122:13	team 3:24 23:5	102:16 103:8
system 33:15	127:15	39:22 52:20	104:25
33:16 38:9	129:16 144:7	52:21 125:5	106:12 107:1
38:10,20	159:16	126:10,11,12	107:19 116:1
56:1 126:12	168:23 181:4	126:15	119:13
135:13 154:8	181:6	151:11	122:25 124:1
164:7	talked 21:19	159:13,15,24	130:18
systems 61:3	31:3 37:25	166:2 180:11	181:18
	86:9 116:2	184:16,17	test 141:16
	120:4 121:20	186:5	testified 6:13
T	121:21	teams 129:25	6:23 7:7,16
T 2:11 187:1,1	122:20	129:25	7:23 8:2
T's 163:6	150:19	tech 134:21,23	9:14,21
T-a-g 80:20	169:24	134:24 136:7	10:11 11:7
T-r-o-u-p 64:1	talking 20:9	136:8,11	testify 5:2,23
T-r-u-e 63:25	36:25 37:11	138:2,8,13	10:16
Tag 80:7,18,19	42:8 48:9	138:24 139:3	testimony 4:16
91:8,10	53:22 55:20	139:6	4:20 5:5,20
94:10,11,21	68:23 97:18	techniques	6:8 12:1,5,7
take 4:15	99:7 105:11	48:8	12:18 13:14
13:15 17:10	114:21 115:1	techs 139:5	13:18,20
50:1 56:14	157:12	tell 21:22	14:4 44:5
66:15 78:13	159:22 166:5	40:4 83:4	61:9 175:24
95:11 120:2	166:6,9,11	86:20 87:10	183:24
134:24	166:20	110:19 180:4	testing 179:1
136:17	168:18,21	telling 167:19	tests 135:7
137:12 141:9	176:18	ten 55:18	thank 5:25
141:10,25	tax 9:15 10:13	173:9 178:6	11:10 44:22
153:23 168:9	80:24 83:6	tend 13:20	61:22 78:18
177:7 182:21			

79:1, 2, 4	95:2, 23	179:11, 11	182:12
139:17 140:7	96:20, 21	182:14	title 34:8
178:20	98:4 100:17	throw 40:11	38:2
181:11, 17, 25	100:20	Thursday	today 3:5, 15
183:15, 16, 24	106:20	142:17 144:1	3:22 4:15
183:25 184:1	107:23 110:5	Tiffany 1:14	5:6, 14 12:5
184:2, 18, 20	112:8 121:5	3:2 156:16	12:15 13:3
185:2, 9, 12	128:7 131:20	156:17 157:3	57:8 95:3
185:16 186:1	132:16, 18, 18	157:6 158:25	111:7 120:18
186:12	133:7 134:10	161:2, 2, 19	183:24
thanks 184:12	139:18 148:8	161:22	184:11, 14, 18
184:13	148:11 152:4	time 1:13	185:4, 16
therapies 27:4	155:13	10:15 17:16	today's 5:9
therapists	156:21 160:9	19:9 20:4	51:5
116:17	161:2, 5	21:3, 7 27:9	told 26:25
therapy 6:25	163:15	27:21 29:1	32:21 36:2
7:3 24:7, 12	164:14 165:4	30:15 31:19	83:2 92:19
25:17 28:1, 5	167:4, 15	33:10, 12	117:24
33:25 40:21	168:4 170:25	35:19 39:9	121:17 159:4
42:11, 20	171:4 172:5	45:22, 23	159:5
45:5, 11 46:5	173:18	48:7 49:23	top 139:10
118:19	174:13	49:24 50:19	156:24
119:20, 23	175:16	50:23 52:15	157:25
120:3, 10, 19	176:15	56:25 58:5	161:17
121:7, 8, 14	180:24, 25	62:8 66:24	total 47:11
121:18 122:8	third 5:21	67:4 69:8	50:5, 11
167:10, 10	47:13 167:11	73:12 78:24	Tox 133:2
thing 67:1	178:2	86:6, 11, 13	Trades 47:11
74:11 118:16	thirties 18:20	92:24 97:11	train 34:13
126:3, 4	thoroughness	105:21 116:9	training 34:7
175:10	181:25	116:18	155:23 156:3
things 4:10	thought 20:8	122:10 124:1	157:16, 18
37:22 73:3	44:6 67:6	133:11	trans 148:2
159:13 167:4	78:21 87:7	136:16 138:6	transaction
174:12	92:15 140:19	149:5 150:5	9:7 109:10
think 20:13, 21	140:23 166:9	157:19	109:14, 19
21:17 27:2, 3	181:12	162:12	111:5, 10
48:5, 7 51:7	thousand 77:22	163:23 165:2	transactions
53:8 57:22	three 19:2	179:4 184:13	9:5, 8 69:9
59:9 60:10	21:2 34:2	187:8	110:12
63:10 66:1	45:2, 2, 14	times 36:24	transcribed
71:23 77:24	54:24, 25	37:2 45:14	13:19
78:4, 5, 11, 19	55:2, 20, 22	121:7, 8	transcript
79:6 80:14	77:21 100:17	timing 121:22	187:6, 15
92:17, 23	134:10	121:24	transfer 68:4
93:25 94:6	146:16 167:7	tirelessly	86:6, 10, 18

87:11 103:9	105:24 147:2	19:22 21:17	typically
103:14, 18, 22	148:3	27:2 37:5	43:21 52:8
104:1 107:13	transported	44:4 48:1	54:11 123:7
107:24 108:4	145:2	63:10 74:21	123:19, 21
112:3	transports	87:22 96:3	124:20 126:3
transferred	145:4	96:11 108:14	154:2, 3
9:24 23:13	treating	110:21	172:17
86:11 107:6	183:13	111:20 129:2	
108:9, 11	treatment 3:10	129:21	U
111:4	4:24 5:13	137:16	UB 2:18 150:23
transferring	6:11, 21 7:20	138:13 141:1	150:25 151:3
9:18 87:2	8:7, 14 15:17	141:2, 20	155:17, 20
93:1 103:8	16:1 17:8	152:1 166:18	156:7, 12, 14
107:4, 14, 20	20:13, 14	173:4	156:19
107:25	21:14 23:14	turn 5:19 8:11	158:14, 24
108:18 111:3	24:2 25:11	181:20	159:18 160:3
111:15 112:1	27:8, 13, 17	182:12	160:4, 11, 20
transfers 9:11	30:5, 14, 18	twenties 18:1	161:17, 18, 23
10:3, 12	31:17 34:3	18:7	162:18, 25
67:21 86:3	46:20 49:6	twice 7:19	163:25
86:16 87:19	53:22 57:15	170:12	Uh 125:14
92:14 95:16	59:17, 20	171:25	um-hmm 13:5
97:1, 21	62:18 81:11	173:25 174:1	23:20 25:21
98:10, 14, 22	123:9 130:2	179:3	26:15 28:6
103:18 107:7	138:18 145:2	two 19:2 25:24	29:21 33:7
107:9, 12, 12	148:7, 9, 18	47:15 62:8	34:10 39:18
110:7, 20	164:24	79:16 87:19	53:17 85:14
111:14	169:20 182:6	111:4, 14	89:8 95:5
112:11, 17, 24	182:15, 25	123:15, 23	98:13 101:13
113:5, 11, 16	183:5	155:4 176:21	105:5 152:6
113:22, 25	treatments 4:6	177:20, 22	Um-umm 176:10
114:2, 10, 12	24:11 62:23	two-and-a-...	umm 15:8 17:23
114:16, 18	Tree 22:24, 25	34:22 35:18	20:1 21:12
transition	Trenton 1:11	two-thirds	22:7 24:15
155:16, 19, 21	trickle 37:15	21:1	28:1 29:25
156:24	tried 180:22	type 4:5 31:22	32:7 37:12
157:20	trigger 123:2	32:8 40:18	37:22 40:25
160:18	124:14, 24	42:7 47:2	42:2, 9 50:18
Transitional	triggering 9:9	49:10 63:22	65:24 71:6
14:22	triggers	71:4 72:24	93:5 98:4
transitioned	122:25	73:18 86:21	102:4 111:17
36:7	Troup 63:24	129:18	114:13
transport 15:7	64:2, 4	152:20 159:9	126:16
145:6 146:18	true 89:7	types 10:11	140:19
transporta...	187:6	43:14 91:24	155:10 161:2
8:9 15:1, 6	trying 15:9	typical 113:10	174:12

un 97:12	162:11	utilize 61:5	77:3,25 80:4
unbundle	update 78:21	171:3	81:15 87:18
167:17	upgrades		87:21 110:3
168:14 175:4	100:25	V	110:24 112:2
177:15,20	upheld 5:18	Vaguely 142:5	112:21 115:1
unbundled	urine 7:9	Valley 24:22	115:24
166:22 167:8	131:25 135:6	25:5	126:16
167:14,20	135:22,25	Vanessa 157:23	129:22 130:1
174:3,3,4,5	136:6,17	158:2	134:18
175:15	137:13,22	varied 153:16	139:17 143:4
undated 161:25	138:10,16	154:3	144:2,3,7
underneath	140:18	various 4:11	145:7 146:10
20:5 30:4	142:24 143:2	10:1 43:18	161:13
underscores	143:5,9,14	vehicles 8:23	166:16
5:14	143:22 167:3	105:15,20,23	169:14
understand	167:11 168:3	148:2	171:20 172:8
12:10,20,22	169:23	vendor 64:25	172:9 173:19
12:25 21:25	174:14,23	verbal 27:3	175:23
32:20 37:17	177:4 179:1	verbatim 31:15	176:16 181:1
74:21 137:16	urines 134:22	Verification	181:2 184:12
141:2,3	134:25 135:1	128:5	184:25 185:7
173:5 182:17	138:4 141:8	versus 48:1	185:15 186:1
understanding	170:11	57:1 96:18	wanted 24:18
13:2 31:25	use 33:16	141:3	25:10 87:1,4
60:23 99:18	63:15 75:23	viable 73:25	111:1 130:3
104:14	76:2 81:2,4	Victory 26:11	162:7,7,25
109:16 111:7	83:14 89:25	26:12,16,20	163:5 180:22
140:1 158:21	106:5,16,16	27:5,6,17	181:5 184:22
166:25	125:9 127:19	128:16	wanting 185:22
167:25 168:8	128:11	view 71:24	wasn't 19:7,25
170:4 171:7	132:12,20	virtually 7:25	21:1 28:4
174:17 178:9	133:10 151:3	vodka 18:17	87:24,24
unethical 4:4	164:20	19:3	97:16 122:11
7:8	167:14,17,20	volunteer	157:8
unfortunate	user 94:24	147:13,19	watch 106:20
95:23	uses 54:7	volunteered	106:24
uniform 110:21	125:5 133:8	147:8,23	watched 122:2
110:24	usually 45:2		watching
111:21 112:2	45:14	W	185:17
Unit 102:21,21	utilization	W 1:15	way 32:19
University	125:5 126:10	W-2 89:17,20	46:17 48:11
20:3 28:23	126:12,14,17	W-2s 94:16	48:19 52:3
29:9	126:23,24	want 30:1,19	98:15 107:13
unregulated	127:2,10,11	31:10 42:2	107:16 108:8
4:13	128:2 130:12	44:19 59:4	110:20 111:6
unresolved	131:12 164:5	61:1 62:1	117:18,19

126:9 138:22	97:24 134:10	44:15,20	147:20
161:10 171:9	171:5	59:14 60:3	151:22 153:9
171:21,24	weren't 18:11	60:13,25	156:7,20
172:10,24	140:24	61:14,17,21	158:8,16
175:23 176:5	158:18	78:21 114:13	159:1,17,19
176:23 177:1	West 1:10	114:18,22	163:3,11
179:12	101:11	115:3,6,9,12	175:18
181:13	102:20,20,21	115:18 140:4	182:11,14,20
ways 51:25	145:17,21	159:14	183:13 184:9
52:4	wife 8:5 14:18	176:23 177:1	184:15,19
we'll 52:11	15:11 18:22	177:13,17,24	185:9,19,25
78:14	19:19 20:9	178:4,12	186:7
we're 66:1	20:17 68:4	181:2,6	worked 16:3
81:10 139:20	79:13 90:8	182:5	27:9 48:3
152:18	101:22	witnesses 5:21	129:1 134:19
we've 105:10	103:22	6:8,15	workers 7:7
127:6 180:20	105:25	woman 77:7	working 18:1
website 51:17	106:19 107:7	169:6	20:12 21:3
websites 51:23	108:11,20	Wonderful 3:2	21:13 22:21
wedding 19:3	131:5,11,15	140:5	23:11,15
week 27:23	131:18	wondering	24:17 25:12
40:16 42:16	182:10	114:10	30:14 33:4
42:19,22	wife's 14:16	Woodbury 28:15	37:13 49:23
45:1,2,7,14	85:9 95:8	words 80:14	61:4 66:16
46:1 123:14	102:1,5	161:5	81:16 126:19
124:21 126:3	103:16,19	work 18:10,10	134:16
136:17	104:2 107:6	18:12 19:24	136:11
156:13	107:21 108:3	21:2 23:4	152:22,23
weekly 58:9	108:5 148:2	24:16 25:6	157:19,21
132:3,5,7,9	Wilkins 41:10	25:22 29:20	182:1
135:3,22	41:11	29:24,25	works 41:13
weeks 4:1	Williams 1:14	30:2 33:19	124:8 151:8
76:12 84:8	3:3 143:22	52:19 53:5	151:19
97:18 123:23	Williamstown	54:17,22	world 19:24
123:24 130:7	24:2	57:15 58:18	23:14 30:6
weird 40:10	winning 31:12	65:9,13,16	46:22,23
155:3	31:13,16	71:20 77:11	Worldwide
welcomes 183:3	wise 172:5	77:13,16	133:3
went 10:6,7,9	withdrawal	78:13 82:18	worse 4:10
19:4,16 20:2	67:14,16	94:25 95:8	18:16 130:23
20:16,23,24	withdrawals	99:19 116:10	wouldn't 56:10
24:16 25:11	67:12	117:11	73:9 98:23
26:10,10	witness 1:20	119:17	131:9 138:21
48:11 58:5	2:3 4:16	128:18,18	152:13
59:23 60:24	5:15 6:16	130:8,16	wrap 78:25
96:12,14	11:2,3 44:9	136:9 147:12	164:20

writing 7:4	155:13 161:8	177:4	2013 23:14,18
written 55:25	169:8 171:10	10,000 9:10	23:23 25:3
85:23 161:18	175:9	109:19	29:18
161:19 186:8	year 6:4 23:12	10:00 1:13	2014 29:18
wrong 77:25	26:5 29:10	120:18	2015 25:3,25
96:5,9 97:13	50:3 64:6	142:17,18	28:21 29:23
161:4	65:9 66:21	143:24,25	2017 25:25
wrongly 95:24	69:7 73:5	10:45 120:19	2018 17:20,22
95:25	77:23 81:23	100 172:23,23	31:20 32:24
	82:1,4 88:13	173:2,8	32:24 48:25
<hr/> X <hr/>	132:19	177:2 178:6	50:19 51:5
x 1:3,7 2:1,11	154:25	1035 91:25	62:2 88:6,7
69:20 87:19	171:18	11 2:6 14:5	88:15 90:13
	yearly 73:15	55:18 169:19	105:17
<hr/> Y <hr/>	84:22 153:13	11:00 18:10,11	116:21 127:5
Y 87:20	years 8:21	112 102:19	127:21 142:3
yeah 15:16	17:23,25	11th 3:8 4:19	142:4 150:20
16:8 22:23	18:6 25:2,7	6:3 122:4	155:1
24:5,8 25:21	25:24 34:22	120,000 50:15	2019 32:7,8,13
27:9 30:2	35:18 48:3	95:4	36:10,11
31:16 32:22	80:12 88:2,4	1225 101:10	37:1 57:8,20
40:20 42:6	88:5 105:11	124 99:13	57:21 88:9
47:4 52:12	158:17,22	100:24	88:16 90:15
52:23 57:9	159:4 182:8	13:43-5.9	94:4 169:19
62:6 64:3	182:11	187:16	175:12
67:4 69:22	years' 158:23	130 180:8	2020 29:11
69:24 71:9	159:11	131-137 1:10	88:11,16
71:19 72:1,1	Yep 45:10	15 7:1 8:17	90:17 91:15
75:7,13	yesterday	62:4 99:2	91:20 92:2
76:25 77:2	161:16	104:4	93:14,20,21
78:3,11	youth 182:8	15,000 10:7	162:12
79:25 83:23		16 17:23	2021 62:2
84:19 86:17	<hr/> Z <hr/>	161 2:18	88:13,16
86:19,23		18,000 111:19	90:19 91:5
93:25 97:4	<hr/> 0 <hr/>	184 2:14,18	91:11,18,24
97:12 98:7		19 36:10	94:10 127:23
99:1,9 109:1	<hr/> 1 <hr/>		152:5 154:17
111:9 116:13	1 102:21 142:3	<hr/> 2 <hr/>	160:16
117:3 118:3	1-1/2 8:24	2 62:11 102:22	162:13 166:3
123:11	1,000 180:7	2,000 100:8	2022 1:12 14:5
124:22	1,250 85:2,6	160:9,15	16:12
126:20,22	85:11	2:05 186:14	21 1:12 127:22
129:6 137:12	1.5 10:8	20 154:5 173:1	127:25
141:5 142:20	1:00 142:18	173:9 177:5	22 182:8
143:20	143:25,25	178:5,6	24 137:18
147:21 151:7	10 172:25	2000 23:17,18	25 158:17,21

158:23 159:4 159:4,11 25,000 26:3 154:5 250 180:9 29 26:6	17:17,18 115:12		
<hr/> 3 <hr/>	<hr/> 7 <hr/>		
3- 101:7 30 26:6 50:18 51:4,4 57:5 173:1 30s 51:8 30XI00148700 187:20 310 102:21,21 312 102:20 314 102:20	7 154:1 7/29/20 113:2 7/30/20 113:3 70 106:11 172:25 173:9 177:3 178:6 70,000 113:4		
<hr/> 4 <hr/>	<hr/> 8 <hr/>		
4,000 100:21 101:8 40 51:7 182:13 40s 50:21 51:1 45 6:25 42:24 45:9 116:5,7 116:11 169:24	8.7 62:10 8/20/2019 110:17 8/26/2019 110:17 8/27/2019 110:17 8/3/20 113:3 8/30/2019 110:17 8/5/20 113:3,4 8:00 142:18 144:1 80,000 106:11 80305 169:22		
<hr/> 5 <hr/>	<hr/> 9 <hr/>		
50 98:19,22 50,000 26:19 50/50 30:17 500 27:23 54-3 1:6	9,000 9:13 110:13,18 111:1,3,4,15 111:16,21,23 112:1,2,11 112:15,18 114:12 90834 169:23 170:4 95 113:6 95,000 113:2,3 113:3,3 97 113:6		
<hr/> 6 <hr/>			
6/3 111:4 6/3/2019 110:14,15 111:14 6/4/2019 110:15 6/5/2019 110:15 65,000 17:15			