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9 Attorneys for Defendant
GREGORY BELCHER
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

| | | |
|------------------------------|---|-------------------------------|
| 15 UNITED STATES OF AMERICA, |) | CASE NO. 16-CR-00211 LHK |
| Plaintiff, |) | |
| |) | STIPULATED JOINT STATEMENT OF |
| v. |) | ADMITTED TRIAL EXHIBITS |
| |) | |
| 18 VILASINI GANESH |) | Date: December 12, 2017 |
| and GREGORY BELCER, |) | Court: Hon. Lucy H. Koh |
| |) | |
| 19 Defendants. |) | |

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21 The United States, defendant Vilasini Ganesh, and Gregory Belcher, by and through their
22 attorneys (collectively, the "Parties"), stipulate that this filing reflects their understanding of the exhibits
23 that have been admitted into evidence in this case.

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28 JOINT STATEMENT OF ADMITTED EXHIBITS
16 CR 00211 LHK

1 DATED: December 11, 2017

Respectfully submitted,

2
3 /s/ _____
JEFFREY NEDROW
PATRICK DELAHUNTY
4 Assistant United States Attorneys

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7 /s/ _____
8 NAOMI CHUNG
BRENDAN HICKEY
9 Counsel for Dr. Gregory Belcher

10
11 /s/ _____
12 DANIEL HOROWITZ
13 Counsel for Dr. Vilasini Ganesh

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| EXHIBIT NUMBER | DATE | | DESCRIPTION | BATES RANGE |
|----------------|---------------------------|---------------------------------------|---|-------------|
| | Marked for Identification | Admitted in Evidence | | |
| 7 | 10/24/17 | p.6, p.71 p.96-106 p.188-229 | Cynthia Jamison Records and Documents Provided by Jamison | |
| 8 | 10/24/17 | 10/24/17 | Search Warrant Photos From 18805 Cox Ave. Suite 110 And 5.20.15 | |
| 15a | 11/06/17 | 11/06/17 | Aetna Claims Spreadsheets – Aetna Part 1 – siu43070.xlsx | |
| 15b | 11/06/17 | 11/06/17 | Aetna Claims Spreadsheets – Aetna Part 2.xlsx | |
| 15c | 11/06/17 | 11/06/17 | Aetna Claims Spreadsheets – Aetna Part 3 – siu43070.zp.xlsx | |
| 32 | 11/06/17 | 11/06/17 | Aetna Claim Details and Check Payments | |
| 33 | 11/06/17 | 11/06/17 | Anthem Claim Details and Check Payments | |
| 34 | 11/06/17 | 11/06/17 | Blue Shield Claim Details and Check Payments | |

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| 35 | 11/06/17 | 11/06/17 | Cigna Claim Details and Check Payments | |
| 36 | 11/13/17 | 11/13/17 | Optum/United Health Claim Details and Check Payments | |
| 37a | 11/06/17 | 11/06/17 | 37283 Dr. Ganesh PIN Claim Detail.xls | |
| 37b | 11/06/17 | 11/06/17 | 37283 UWID 1 1 2013 to 1 31 2017 .xls | |
| 37c | 11/06/17 | 11/06/17 | 37283 UWID 1 2013 to 1 2014.xls | |
| 37d | 11/06/17 | 11/06/17 | 37283 UWID 12 2012 to 20 2013.xls | |
| 37e | 11/06/17 | 11/06/17 | Copy of 43070 SPM CA FBI | |
| 38a | 11/06/17 | 11/06/17 | Copy of Dewees Subpoena.xlsx | |
| 38b | 11/06/17 | 11/06/17 | Copy of PIIDMS-24-923 Subpoena | |
| 38c | 11/06/17 | 11/06/17 | Copy of Campbell Medical Group Ganesh Vilasini090114-063015.xls | |
| 39a | 11/06/17 | 11/06/17 | Final Campbell Med Grp, Kuhlman, Riley & Dewees 092414.xlsx | |
| 39b | 11/06/17 | 11/06/17 | Final Dr Belcher, MD only w NPI 092414.xlsx | |
| 39c | 11/06/17 | 11/06/17 | Final Edward C. Dewees III, MD only 092414.xlsx | |
| 39d | 11/06/17 | 11/06/17 | Final Vilasini Ganesh, MD Only w NPI 092414.xlsx | |
| 40a | 11/06/17 | 11/06/17 | R_1983_20150410-36638 Medical Results.xls | |
| 40b | 11/06/17 | 11/06/17 | R_1983A_20150410-36638 CW.xls | |
| 40c | 11/06/17 | 11/06/17 | R_1983B_20150410-36638 CW.xls | |
| 40d | 11/06/17 | 11/06/17 | R_1983C_20150410-36638 CW.xls | |
| 42a | 11/06/17 | 11/06/17 | AARP 1 Sorted 09232014.xlsx | |
| 42b | 11/06/17 | 11/06/17 | AARP 2 Sorted 09232014.xlsx | |
| 42c | 11/06/17 | 11/06/17 | Galaxy 1 Sorted 09232014.xlsx | |
| 42d | 11/06/17 | 11/06/17 | Galaxy 2 Sorted 09232014.xlsx | |
| 42e | 11/06/17 | 11/06/17 | Galaxy 3 Sorted 09232014.xlsx | |

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| | Marked for Identification | Admitted in Evidence | | |
| 42f | 11/06/17 | 11/06/17 | Galaxy 4 Sorted 09232014.xlsx | |
| 42g | 11/06/17 | 11/06/17 | Galaxy 5 Sorted 09232014.xlsx | |
| 42h | 11/06/17 | 11/06/17 | Pacificare 1 Sorted 09232014.xlsx | |
| 42i | 11/06/17 | 11/06/17 | Pacificare Rims Sorted 09242014.xlsx | |
| 44 | 11/06/17 | 11/06/17 | Belcher Google Calender | |
| 47 | 11/21/17 | 11/21/17 | Bank Of America Account for Ganesh and Belcher Accounts | |
| 50 | 11/21/17 | 11/21/17 | Bank Of America 8753 Withdrawals For Cashier Checks | |
| 51 | 11/21/17 | 11/21/17 | Bank Of America Statements And Deposits Including Gregory Belcher Account, including -8753 | |
| 54 | 11/21/17 | 11/21/17 | Bank Of The West Statements - 9019 | |
| 60 | 11/21/17 | 11/21/17 | Bank Of The West Statements - 2127 | |
| 61 | 11/21/17 | 11/21/17 | Bank Of The West Statements - 7654 | |
| 67 | 11/21/17 | 11/21/17 | Bank Of The West Signature Cards | |
| 70 | 11/21/17 | 11/21/17 | Bank Of The West Deposits and Withdrawals -9019 | |
| 72 | 11/21/17 | 11/21/17 | Bank Of The West Deposits and Withdrawals -2127 | |
| 74 | 11/21/17 | 11/21/17 | Bank Of The West Deposits and Withdrawals -7654 | |
| 88 | 11/06/17 | 11/06/17 | Anthem Claim Information related only to Belcher | |
| 88a | 11/06/17 | 11/06/17 | Gregory L. Belcher, M.D. XLSB | |
| 89 | 11/14/17 | 11/14/17 | Cigna Claim Information related only to Belcher | |
| 90 | 11/21/17 | 11/21/17 | Belcher Bank Of America Signature Cards | |
| 92 | 11/13/17 | 11/13/17 | Correspondence from Campbell Medical Group to Sunil Kakkar | |
| 96 | 10/24/17 | 10/24/17 | Patient Medical Records for Michael Kelly | |
| 97 | 10/24/17 | 10/24/17 | Patient Medical Records for Surekha Soni | |
| 98 | 10/24/17 | 10/24/17 | Patient Medical Records for Mastenah Habibi | |

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| | Marked for Identification | Admitted in Evidence | | |
| 99 | 10/24/17 | 10/24/17 | Patient Medical Records for Ann Dwan | |
| 100 | 10/24/17 | 10/24/17 | Patient Medical Records for Sunil Kakkar | |
| 101 | 10/24/17 | 10/24/17 | Patient Medical Records for Anthony Bonte | |
| 102 | 10/24/17 | 10/24/17 | Patient Medical Records for Karen Frugoli | |
| 103 | 10/24/17 | 10/24/17 | Patient Medical Records for Joann Benson | |
| 104 | 10/24/17 | 10/24/17 | Patient Medical Records for Lee Fort | |
| 105 | 10/24/17 | 10/24/17 | Patient Medical Records for Sharma Serita | |
| 108.a | 10/24/17 | 10/24/17 | Sign-In Sheets for Physical Therapy/Massage Therapy for 2012 | |
| 108.b | 10/24/17 | 10/24/17 | Sign-In Sheets for Physical Therapy/Massage Therapy for 2013 | |
| 108.c | 10/24/17 | 10/24/17 | Sign-In Sheets for Physical Therapy/Massage Therapy for 2014 | |
| 108.d | 10/24/17 | 10/24/17 | Belcher Sign-In Sheets | |
| 108.e | 10/24/17 | 10/24/17 | Massage Therapy Sign-In Sheets | |
| 108.f | 10/24/17 | 10/24/17 | Physical Therapy Sign-In Sheets 2015 | |
| 108.g | 10/24/17 | 10/24/17 | Physical Thereapy Sign-Sheets Mutli-date and Undated | |
| 109 | 10/24/17 | 10/24/17 | CMG Sign-In Sheets | |
| 110.a | 10/24/17 | 10/24/17 | Correspondence from Aetna to CMG on 1/17/13 | |
| 110.b | 10/24/17 | 10/24/17 | Correspondence from Blue Shield of California to KRD on 2/21/14 | |
| 110.c | 10/24/17 | 10/24/17 | Correspondence from CMG to Aetna re Kakkars on 3/20/13 | |
| 110.d | 10/24/17 | 10/24/17 | Correspondence from Aetna to Ganesh on 4/13/12 w/ Ganesh notes | |
| 110.e | 10/24/17 | 10/24/17 | Correspondence from Aetna to Ganesh on 3/29/13 re Kakkars | |
| 110.f | 10/24/17 | 10/24/17 | Correspondence from Aetna re Kakkars with handwritten notes | |

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| 110.g | 10/24/17 | 10/24/17 | Correspondence from Aetna re Kakkars with handwritten notes re dates of actual service | |
| 111 | 10/24/17 | 10/24/17 | CMG Billing Records with Handwritten CPT Codes | |
| 112 | 11/21/17 | 11/21/17 | Bank of America Statements for Belcher Account -9944 | |
| 113 | 11/21/17 | 11/21/17 | Bank of America Debits for Belcher Account -9944 | |
| 114 | 11/21/17 | 11/21/17 | Bank of America Deposited Checks for Belcher Account -9944 | |
| 115 | 11/21/17 | 11/21/17 | Bank of America Deposit Tickets for Belcher Account -9944 | |
| 116 | 11/06/17 | 11/06/17 | Blue Shield of California Claims information related to Belcher | |
| 118 | 11/07/17 | 11/07/17 | Summary Charts; Spreadsheet-Holiday and Weekend Claims-Belcher | |
| 119 | 11/07/17 | 11/07/17 | Summary Charts; Spreadsheet-Spreadsheet- Patients Named in Complaint- Belcher | |
| 120 | 11/07/17 | 11/07/17 | Summary Charts; Spreadsheet-Top Bill Days- Belcher | |
| 121 | 11/07/17 | 11/07/17 | Summary Charts; Spreadsheet-Holiday and Weekend Claims-Ganesh | |
| 122 | 11/07/17 | 11/07/17 | Summary Charts; Spreadsheet-Patients Named in Complaint-Ganesh | |
| 123 | 11/07/17 | 11/07/17 | Summary Charts; Spreadsheet-Top Billed Days- Ganesh | |
| 128 | 11/21/17 | 11/21/17 | Summary Charts of Bank of America and Bank of West Bank Accounts | |
| 129 | 11/21/17 | 11/21/17 | Summary Charts of Bank of America and Bank of West Bank Accounts | |
| 132 | 11/21/17 | 11/21/17 | Summary Charts of Bank of America and Bank of West Bank Accounts | |

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| 135 | 11/21/17 | 11/21/17 | Ganesh Driver's License | |
| 140-1 | 11/14/17 | 11/14/17 | Claim submitted for 12/30/12 care re M.H. | |
| 141 | 11/21/17 | 11/21/17 | Belcher Driver's License | |
| 143 | 11/06/17 | 11/06/17 | Health Insurance Claim Form 1500 (02-12) | |
| 144 | 11/06/17 | 11/06/17 | 2008-2015 Yearly Calendars | |
| 146 | 11/07/17 | 11/07/17 | Frugoli Calendar | |
| 147 | 11/07/17 | 11/07/17 | Mack Calendar | |
| 148 | 11/07/17 | 11/07/17 | Kakkar Calendar | |
| 149 | 11/07/17 | 11/07/17 | Dwan Calendar | |
| 150 | 11/07/17 | 11/07/17 | Bonte Calendar | |
| 151 | 11/07/17 | 11/07/17 | Soni Calendar | |
| 152 | 11/07/17 | 11/07/17 | Kelley Calendar | |
| 153 | 11/07/17 | 11/07/17 | Habibi Calendar | |
| 154 | 11/13/2017 | 11/13/2017 | Letter to Sarini Kakkar | |
| 155 | 11/21/17 | 11/21/17 | Kikugawa Chart – Total Payments to KRD, Ganesh MD's, Inc. | |
| 156 | 11/21/17 | 11/21/17 | Kikugawa Chart Cashier Checks Deposited to BOW Acct 7654 | |
| 157 | 11/28/17 | 11/28/17 | Liz Michael Claim Calendar | |
| 1013 | 11/06/17 | 11/06/17 | 4 pages of list of patient names and dates of service | |
| 2025 | 10/24/17 | 10/24/17 | Cynthia Jamison (Innovative Billing) Agreement with CMG | |
| 2026 | 12/11/17 | 12/11/17 | Stacy Kinsel Report – Schedule 1 | |
| 2027 | 12/11/17 | 12/11/17 | Stacy Kinsel Report – Schedule 2 | |

JOINT STATEMENT OF ADMITTED EXHIBITS

16 OF 20 PAGES

| EXHIBIT NUMBER | DATE | | DESCRIPTION | BATES RANGE |
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| | Marked for Identification | Admitted in Evidence | | |
| 2029 | 12/11/17 | 12/11/17 | Stacy Kinsel Report – Schedule | |
| 2037 | 12/1/17 | 12/1/17 | Elizabeth Michael Physical Therapy File | |
| 2042 | 11/14/17 | 11/14/17 | Michael Kelley Belcher Patient File | |
| 2077 | 11/28/17 | 11/28/17 | Chandler Gumbs Patient File | |
| 2078 | 12/1/17 | 12/1/17 | Aetna – proof of continued payment to Belcher in 2016-2017 | |
| 2079 | 12/1/17 | 12/1/17 | Blue Cross – proof of continued payment to Belcher in 2017 | |
| 2080 | 12/1/17 | 12/1/17 | Blue Shield – proof of continued payment to Belcher in 2017 | |
| 2081 | 12/1/17 | 12/1/17 | Cigna – proof of continued payment to Belcher in 2017 | |
| 2082 | 12/1/17 | 12/1/17 | UHC/Optum – proof of continued payment to Belcher in 2017 | |
| 2083 | 12/1/17 | 12/1/17 | Medicare – proof of continued payment to Belcher in 2017 | |
| 2084 | 12/1/17 | 12/1/17 | Belcher’s List of Insurers from Lytec | |
| 2086 | 12/11/17 | 12/11/17 | Stacy Kinsel Report – Schedule 2.2 | |
| 2105 | 12/11/17 | 12/11/17 | Kinsel Chart 1 – Belcher Claims | |
| 2106 | 12/11/17 | 12/11/17 | Kinsel Chart 2 – Belcher & Holiday Weekend Claims | |
| 2107 | 12/11/17 | 12/11/17 | Kinsel Chart 3 – Belcher Holiday & Weekend Claim Pie Chart | |

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| EXHIBIT NUMBER | DATE | | DESCRIPTION | BATES RANGE |
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| 2108 | 12/11/17 | 12/11/17 | Kinsel Chart 4 – Comparison of Belcher & Ganesh Holiday & Weekend Claims | |
| 2109 | 12/11/17 | 12/11/17 | Kinsel Chart 5 – Michael Kelley Pie Chart | |
| 2110 | 12/11/17 | 12/11/17 | Kinsel Chart 6 – Anthony Bonte Pie Chart | |
| 2111 | 12/11/17 | 12/11/17 | Kinsel Chart 7 – Mastaneh Habibi Pie Chart | |
| 2112 | 12/11/17 | 12/11/17 | Kinsel Chart 8 – Specific Patients Chart | |
| 2113 | 12/8/17 | 12/8/17 | Dr. Belcher’s W-2 for Abigail Cabral | |
| 2115 | 12/11/17 | 12/11/17 | Declaration of Donsia Strong Hill | |