

**“Exhibit 1” To Relator’s Third Amended Complaint****Potential Witness List**

<b>NAME</b>	<b>Employment Status if Known</b>	<b>Job Title</b>	<b>Relevant Knowledge and/or Connection to the Case</b>
Peter Durkin	Current	PPGC, Fannin, Pres/CEO  PP Surgical, Fannin, Pres/CEO  PP Action Fund Fannin, Pres/CEO	<p>President and CEO of PPGC and PP Surgical. Traveled to all of the PPGC to provide staff training. Training provided by Mr. Durkin included the strategies for maximizing revenue each clinic generated from government health care programs as set out in Relators Complaint.</p> <p>Relator also interacted with Mr. Durkin at staff meetings at PPGC’s corporate office in Houston. [Annual “staff day” - meetings etc.]</p> <p>Mr. Durkin also held annual budget meetings at each PPGC clinic which was attended by all local staff members. Mr. Durkin also attended fund raising events, “Business After Five” meetings etc. Mr. Durkin was often accompanied by Melanie Linton, Rebecca White, and Rochelle Tapiola (sp) on his visits to local clinics.</p>
Dana Hurt	Current	PPGC, Fannin, Vice Chair  PP Surgical, Fannin, Chair	
Karen George	Current	PPGC, Fannin, Chair	
Diana McSherry	Current	PP Surgical, Fannin, Tres	

Melany Linton	Current	PP Surgical, Fannin, Sr VP	<p>Traveled to Lufkin for political fundraising etc. Was also the person who often communicated policy changes regarding starting and stopping providing services that are reimbursed under Title XX funding, as well as changes for Medicaid billing. Ms. Linton, along with Ms. Melody Wood actually submitted billing claims to the government.</p> <p>Ms. Linton is one of the corporate officers who implemented the fraudulent billing polices set out in Relator's Second Amended Complaint. Ms. Linton would inform clinic staff (directly and also through communications, emails, etc.) "we have extra Title XX money in the budget," so perform every test you can on Title XX patients. Likewise, whenever it appeared that PP was running low on Title XX funding, Linton would tell the clinics to hold off on testing and only do what was medically indicated until further notice. Staff were given this type of "on again/off again" instruction throughout the year, but more often they were told to 'slow down' towards the end of the fiscal year (September 1).</p>
Keetha Buster	?????	PP Surgical, Fannin, COO	Traveled to Lufkin with Peter on several occasions. Was Chief Financial Officer, title changed to COO. Talked to group meetings about projected income and expenses. Ms. Buster is expected to have knowledge regarding Defendant's fraudulent billing practices as set out in Relator's Second Amended Complaint.
Sara Brown	Current	Tres PP Surgical,  Vice Chair PP Action Fund ,	
Sandra Smolenski	Current	PPGC, Fannin, Reg Hlth Ctr Dir/Training Admin	Clinic Director of the Fannin Clinic. Came to Lufkin and trained management and staff on billing, patient interviews, CPR, etc. Ms. Smolenski performed chart reviews of the Lufkin clinic including 'regular' chart reviews, but also the 'matching record to bill' type review. Ms. Smolenski was the fill in clinic director for Lufkin between Wheeler and Green. Ms. Smolenski has knowledge regarding Defendant's fraudulent billing practices as set out in Relator's Second Amended Complaint. Diana and Michelle
Diane Santos	Current	PPGC, Bryan Clinic, Reg Hlth Ctr Dir  PP Surgical, Bryan Clinic, Dir	Clinic director of PP Surgical clinic in Bryan. This witness is expected to have knowledge regarding Defendant's fraudulent billing practices as set out in Relator's Second Amended Complaint.
Debbie Dean	Former Employee	PPGC, Officer, Quality Assurance Director	This witness administered internal QA audits, administrated external QA audits. This witness is expected to have knowledge regarding Defendant's fraudulent billing practices as set out in Relator's Second Amended Complaint.

Laurie McGill	Current	PPGC, Officer, Policies/Billing	<p>Former director of Lufkin Clinic. Moved to corporate office. Direct Supervisor over various clinics, including Lufkin Clinic. Ms. McGill, along with Melanie Linton, directed all billing policy changes and procedures including every policy set out in Relator's Second Amended Complaint.</p> <p>McGill and Linton would sometimes send the emails out Regarding: Title XX funding money left in the budget etc. [i.e. - do all the tests you can or "only do what is medically necessary". Has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>
Bonnie Smith	Current	PPGC, Fannin, Policies/Medical	<p>Nurse practitioner. Ms. Smith traveled to the Lufkin Clinic to do colonoscopies. Ms. Smith directed policy changes for medical procedures. Procedures for dispensing medications etc. and sometimes filled in as a nurse practitioner when needed at Lufkin Clinic. Ms. Smith participated in entering fraudulent billing charges as outlined in Relator's complaint and has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>
Melanie Wood	Current	PPGC, Fannin, A/R, Billing	<p>Ms. Wood is in charge of Accounts Receivable/Billing and Personnel for PPGC. Ms. Wood compiled the fraudulent billing charges for each PPGC clinic and submitted them to the government health care programs for payment set out in Relator's complaint. This witness is has knowledge regarding Defendant's fraudulent billing practices as set out in Relator's Second Amended Complaint.</p>
Pam Whitaker	Current	PPGC, Fannin, HR Dept.	<p>Administrator - human resources Administrator for PPGC payroll This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>
Tracy Chastine	Former Employee	PPGC, Fannin, Trainer	<p>E.M.T. She trained all clinic personnel on OSHA, CPR, computers, billing, documentation procedures, etc. She trained Brook McFadden, who took Tracy's place. Has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>

Marina Lansenberg	Current	PPGC, Fannin, IT Dept.	Works in PPGC IT Dept. Implements changes to "Billing Error Software". Set up a Billing error filter that would kick things back if there was a mistake that might affect the bill getting paid. <i>(This allowed PPGC to avoid sending bills that would automatically get kicked back by the state.)</i> Has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
Diana Wheeler	Former Employee	PPGC, Lufkin Clinic, Dir/Nurse Practitioner	Clinic director terminated in 2007. Ms. Wheeler ran the weekly staff meetings, and the monthly staff meetings following the monthly director meetings in Houston. Ms. Wheeler would give the Lufkin staff members the policy and billing changes given her at the director's meetings. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
Regina Wittmann	Former Employee	PPGC, Lufkin Clinic, Asst Dir	Assistant clinic director, briefly replaced Diana Wheeler. Then, the director position was given to Michelle Green. Attended majority of clinic management meetings. Ms. Wittmann was sent by PPGC corporate office to the Greenspoint Clinic to train on how to increase Lufkin's "price-per-visit". [i.e. the Greenspoint Clinic was out performing Lufkin in revenue charged from government programs, so Ms. Green was sent to Greenspoint to train on increasing revenue for the Lufkin clinic.]  This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
Michelle Green	Unknown	PPGC, Lufkin Clinic, Dir	Director of Lufkin clinic after Diana Wheeler was terminated. Instructed Relator to falsely attest to "Occurrence Report" where Ms. Green's friend (April Snelling) gave a patient medication without a prescription, and in the wrong dosage. Relator refused to falsify the report and was terminated by Ms. Green.  This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.

Kimberly Cottle	Former Employee	Lufkin Clinic, Asst Dir	Asst Clinic Director under Michelle Green. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity. .
Della Connor	Former Employee	Lufkin Clinic, Nurse Practitioner	Nurse practitioner at Lufkin clinic. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
Paola Carrizales	Former Employee	PPGC, Lufkin Clinic, Health Ctr Asst	HCA at Lufkin clinic. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
Laura McQueen 652 Cox Rd. Lufkin TX 75904	Former Employee	PPGC, Lufkin Clinic, Health Ctr Asst	HCA at Lufkin clinic. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
April Snelling	Former Employee	Lufkin Clinic, Community Srvs Dir	Community Services Director at Lufkin clinic. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.

Suzy Briedenthall 936 465-1037	Former Employee	Lufkin Clinic Asst	HCA at Lufkin clinic. Worked front desk and did billing.  This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
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<p>Flo Jaramillo 281 236-8306</p>	<p>Former Employee</p>	<p>HCA at Lufkin clinic</p>	<p>HCA at Lufkin clinic. Performed same job duties as Relator.</p> <p>This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>
<p>Kelly Huffhines</p>	<p>Former Employee</p>	<p>Lufkin Clinic Asst.</p>	<p>HCA at Lufkin clinic. Performed same job duties as Relator.</p> <p>This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>
<p>Gloria Ivey</p>	<p>Former Employee</p>	<p>Luf. Clinic Asst.</p>	<p>HCA at Lufkin clinic. Performed same job duties as Relator.</p> <p>This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>
<p>Verna McCarver 936 674-8896 936 398-5740</p>	<p>Former Employee</p>	<p>Lufkin Clinic Asst.</p>	<p>LVN &amp; HCA at Lufkin clinic. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.</p>
<p>Kelly Madkins</p>	<p>Former Employee</p>	<p>Lufkin Clinic Asst.</p>	<p>Worked mostly in the back. This witness, pursuant to PPGC policy, submitted fraudulent billing charges into PPGC's billing records as referenced in Relator's Second Amended Complaint. This witness has knowledge of PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity. .</p>

Abby Brooks	Former Employee	Bryan Clinic Director	Former Director of PPGC clinic in Bryan Texas. This witness should have knowledge PPGC policies and procedures relating to 'across the board' testing and billing of services to patients enrolled in government health care programs without regard to medical necessity.
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