

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
OWENSBORO DIVISION

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DISTRICT COURT CLERK
WESTERN DISTRICT OF KY
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FORBA HOLDINGS, LLC,

Plaintiff,

v.

DEBBIE HAGAN,

Defendant.

Civil Action No.

4:08cv137-M

VERIFIED COMPLAINT

The plaintiff, FORBA Holdings, LLC, states for its cause of action against the defendant, Debbie Hagan, as follows:

PARTIES

1. The plaintiff, FORBA Holdings, LLC ("FORBA"), is a limited liability company organized under the laws of Delaware with its principal place of business in Nashville, Tennessee.

2. FORBA is the nation's largest dental practice management company focused on high-quality dental care for underserved communities. FORBA manages dental practices that operate under the service mark SMALL SMILES (United States Trademark Registration Nos. 3529322, 3440297, 3440292), among other names.

3. The defendant, Debbie Hagan ("Hagan"), is a resident of Ohio County, Kentucky, and can be served with process at 38 Sexton Lane, Reynolds Station, Kentucky 42368.

4. Hagan is the operator of an Internet web site and log ("blog") titled "Dentist the Menace" that appears at <http://debbiehagan.blogspot.com/> and a YouTube video hosting site

titled “Abusive Pediatric Dentistry” that appears at <http://www.youtube.com/user/DebHgn>. Each of these Internet sites is highly critical of, and exhibits a high degree of antipathy to, FORBA and its Small Smiles dentistry centers.

JURISDICTION AND VENUE

5. This action arises under the Copyright Act, 17 U.S.C. §§ 101, et seq., the Kentucky Uniform Trade Secrets Act, KRS § 365.880, et seq., the Tennessee Uniform Trade Secrets Act, Tenn. Code Ann. § 47-25-1701, et seq., and the common law of defamation. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338.

6. This Court has subject matter jurisdiction over the pendant state law claims pursuant to 28 U.S.C. § 1367, because these claims are so related to FORBA’s copyright claims under federal law that they form part of the same case or controversy and derive from a common nucleus of operative facts.

7. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 because FORBA and Hagan are citizens of different states and the amount in controversy exceeds \$75,000 exclusive of interest and costs.

8. Pursuant to 28 U.S.C. § 1391, venue in this district is proper because a substantial part of the events giving rise to the dispute occurred in this district, a substantial part of the property that is the subject of the action is situated in this district, and the Court has personal jurisdiction over each of the parties as alleged in this complaint.

9. Pursuant to Local Rule LR 3.1(b)(3), the Owensboro Division is the proper venue for this action.

FACTS

10. Brentwood Communications, Inc. ("Brentwood Communications"), a third party marketing company under contract with FORBA, maintains a file transfer protocol ("FTP") site at the internet address <ftp://ftp.forbainfo.com> (the "FTP Site"). FTP is a network protocol used to transfer data from one computer to another through a network such as the Internet.

11. The FTP Site is exclusively for FORBA internal use.

12. The FTP Site has been username and password protected since its inception.

13. Only staff of FORBA and staff of Brentwood Communications have been authorized to access the FTP Site and have been issued usernames and passwords for that purpose.

14. FORBA places confidential documents, including documents containing confidential information and trade secrets of FORBA, on the FTP Site so that Brentwood Communications can easily access those documents. Brentwood Communications accesses and uses the documents placed by FORBA on the FTP Site in the planning and development of marketing plans and advertising materials for FORBA.

15. Brentwood Communications also places confidential information on the FTP Site for FORBA to access.

16. Brentwood Communications is contractually required to preserve the confidentiality of all documents placed in the FTP Site.

17. At some point in the recent past, the “search crawler” for the Google search engine was apparently able to access the FTP Site. Upon discovery of this intrusion, software was installed to prevent future unauthorized access.

18. The Internet service and server hosting provider for the FTP Site has advised Brentwood Communications and FORBA that no person or entity other than the Google search crawler (and Hagan) has ever accessed the FTP Site in an unauthorized fashion.

19. FORBA has learned that the Google crawler creates “snapshots” of what it finds and displays such snapshots through search results. FORBA has been informed by Google that Google’s logs report that its search crawler “crawled” the FTP Site in August and September 2008.

20. Unbeknownst to FORBA, after the Google search crawler crawled the FTP site, certain confidential information, including, at a minimum, marketing materials, marketing strategy information, budgeting materials, recruitment strategy information, spreadsheets and facility information lists (the “Confidential Information”) became accessible via the entry of certain terms in a Google search.

21. In late October or early November 2008, Hagan located the Confidential Information via a Google search for the term “forbainfo.com”, a search she admits at her blog that she performed.

22. Immediately upon locating and viewing the Confidential Information, Hagan knew or should have known that the Confidential Information was confidential to FORBA, constituted confidential information and trade secrets of FORBA, and that FORBA did not intend that the Confidential Information be disseminated to the public.

23. FORBA holds copyrights by operation of law in each of the documents constituting the Confidential Information.

24. Despite knowing the confidential nature of the information and FORBA's copyrights in the Confidential Information, Hagan quickly posted links to the Confidential Information on an internet web site maintained by her at the Internet address or URL (universal resource locator) <http://www.dentistthemenace.com>, which URL is redirected to Hagan's blog at <http://debbiehagan.blogspot.com/> (the "Hagan Web Site"). True and correct copies of printouts of pages from the Hagan Web Site are attached hereto as **Exhibit A**.

25. Judging from its content, Hagan established the Hagan Web Site largely as a means to disparage FORBA.

26. On Friday afternoon, November 7, 2008, FORBA discovered that its Confidential Information was being displayed and was available for download at the Hagan Web Site. FORBA immediately conducted an investigation and took action to have the links to the Confidential Information deactivated through communications with Google.

27. On or about November 10, 2008, as a result of FORBA's efforts, Google deactivated the links posted by Hagan.

28. Hagan not only posted links to the Confidential Information. Hagan also copied certain of the Confidential Information to her own computer and to one or more internet servers to which she has access. Specifically, Hagan copied a confidential marketing plan, a confidential recruitment strategy presentation, a confidential advertising budget, and a confidential facility information list (collectively, the "Copied Confidential Documents").

29. Hagan made the Copied Confidential Documents available for download by the public from the Hagan Web Site. The Copied Confidential Documents are available for download from the Hagan Web Site as of the date of the filing of this Verified Complaint.

30. Other than Hagan, FORBA has no reason to believe that any other third party accessed the Confidential Information through a Google search at any time before those documents were removed by Google.

31. Hagan has also published numerous false statements about FORBA on the Hagan Web Site. Hagan has done so with the intent to harm FORBA.

32. On the Hagan Web Site, Hagan represents that “FORBA, LLC is Kool Smiles/Small Smiles,” that FORBA is “also called Kool Smiles,” and that Small Smiles clinics “also go under [the name] Kool Smiles.” Such representations are false and Hagan knew or should have known of their falsity.

33. On the Hagan Web Site, Hagan represents that FORBA practices “abusive dental care.” Such representations are false and Hagan knew or should have known of their falsity.

34. On the Hagan Web Site, Hagan represents that FORBA, directly and/or through subsidiaries, exploits, tortures, abuses, and traumatizes poor families and children. Such representations are false and Hagan knew or should have known of their falsity.

35. On the Hagan Web Site, Hagan represents that FORBA, directly and/or through subsidiaries “Abuses 188,000 Children Each Year.” Such representations are false and Hagan knew or should have known of their falsity.

36. On the Hagan Web Site, Hagan represents that FORBA is a “child abusing company.” Such representations are false and Hagan knew or should have known of their falsity.

37. On the Hagan Web Site, Hagan represents that it is untrue that dentists working at certain Kansas dental centers own the centers. The dentists do own the subject centers. Such representations are false and Hagan knew or should have known of their falsity.

38. On the Hagan Web Site, Hagan represents that FORBA engages in “barbaric back alley dentistry and abusing children in the process” and that “Small Smiles/FORBA dentists” engage in “barbaric treatment of children.” Such representations are false and Hagan knew or should have known of their falsity.

39. On the Hagan Web Site, Hagan represents that dental clinics operated by FORBA or its subsidiaries have quotas to meet with respect to the number of patients served per day. Such representations are false and Hagan knew or should have known of their falsity.

40. On the Hagan Web Site, Hagan represents multiple times that FORBA is associated with an individual named Michael DeRose and/or a company named Michael DeRose and Company. Such representations are false and Hagan knew or should have known of their falsity.

41. On the Hagan Web Site, Hagan represents that FORBA itself owns and operates dental clinics. Such representations are false and Hagan knew or should have known of their falsity.

42. On the Hagan Web Site, Hagan represents that the entry of a service code for “behavior management” on the chart of a patient of a clinic managed by FORBA means that “you tied the child up.” Such representations are false and Hagan knew or should have known of their falsity.

43. On the Hagan Web Site, Hagan represents that “Small Smiles/FORBA doesn’t keep dentists who are patient and nice to children.” Such representations are false and Hagan knew or should have known of their falsity.

44. On the Hagan Web Site, Hagan describes the scene in a clinics managed by FORBA as follows:

I’ve heard recently where children are brought back into the operatory [sic] room, man handled by 300lb a [sic] gorilla of a woman and a couple of other assistants, they are trying to tied [sic] down the child in the papoose board, the child is trying to escape, two bodies are blocking the door and another is trying to pry the child’s fingers off the door knob.

Two or three of them grab the child, body slam him onto the papoose board and strap him in, the dentist comes in, gives him an injection, fails to wait the allotted time to let the numbness take effect but goes to drilling right away.

Such representations are false and Hagan knew or should have known of their falsity.

45. On the Hagan Web Site, Hagan represents that at “Forba Owned Clinics”, “they want those [children’s teeth] to rot.” Such representations are false and Hagan knew or should have known of their falsity.

46. On the Hagan Web Site, Hagan represents that FORBA “insists on abusing children for profit.” Such representations are false and Hagan knew or should have known of their falsity.

47. On the Hagan Web Site, Hagan represents that FORBA does unnecessary dental work, abuses children for profit and fraudulently bills Medicaid. Such representations are false and Hagan knew or should have known of their falsity.

CAUSES OF ACTION

COUNT I – MISAPPROPRIATION OF TRADE SECRETS

(Violation of KRS § 365.880, et seq. and Tenn. Code Ann. § 47-25-1701 et. seq.)

48. FORBA restates and incorporates herein by reference the allegations of each of the above paragraphs.

49. In accordance with the Kentucky Uniform Trade Secrets Act, KRS § 365.880, et seq., and the Tennessee Uniform Trade Secrets Act, Tenn. Code Ann. § 47-25-1701, et seq., the Confidential Documents constitute confidential information and trade secrets of FORBA.

50. FORBA derives actual and potential independent economic value from the fact that the information contained in the Confidential Documents are not generally known to, and not readily ascertainable by proper means by, other persons who can obtain economic value from the disclosure or use of such information.

51. FORBA has taken efforts reasonable under the circumstances to maintain the secrecy of the Confidential Documents and the information contained therein.

52. Hagan has disclosed and used the Confidential Documents and information contained therein without the express or implied consent of FORBA.

53. At the time of her disclosure and use of the Confidential Documents and information acquired therein, Hagan knew that the Confidential Documents and information

contained therein had been acquired under circumstances giving rise to a duty to maintain their secrecy or limit their use.

54. At the time of her disclosure and use of the Confidential Documents and information contained therein, Hagan knew that the Confidential Documents and information contained therein had been derived from or through a person who owed a duty to FORBA to maintain its secrecy or limit its use.

55. At the time of her disclosure and use of the Confidential Documents and information contained therein, Hagan, before a material change of her position, knew or had reason to know that the Confidential Documents and information acquired therein were trade secrets of FORBA and that knowledge of such trade secrets had been acquired by accident or mistake.

56. Hagan's act of disseminating or attempting to disseminate to the public the Confidential Documents constitutes a misappropriation of trade secrets of FORBA in violation of the Kentucky Uniform Trade Secrets Act and the Tennessee Uniform Trade Secrets Act.

57. FORBA has been damaged by Hagan's misappropriation of FORBA's trade secrets.

58. FORBA is entitled to an award of damages for Hagan's misappropriation of trade secrets.

59. Hagan's misappropriation of FORBA's trade secrets has been willful and malicious. Consequently, pursuant to KRS § 365.884(2) and Tenn. Code Ann. § 47-25-1704, FORBA is entitled to an award of exemplary damages in an amount of twice FORBA's damages.

Pursuant to KRS § 365.886 and Tenn. Code Ann. § 47-25-1705, FORBA also is entitled to an award of its reasonable attorney's fees.

60. Pursuant to KRS § 365.882(1) and Tenn. Code Ann. § 47-25-1703(a), the Court should enjoin Hagan's future misappropriation of FORBA's trade secrets, including Hagan's use and/or dissemination any and all of the Confidential Documents. Pursuant to KRS § 365.882(3) and Tenn. Code Ann. § 47-25-1703(c), the Court should also compel Hagan to take affirmative acts to protect FORBA's trade secrets, including, without limitation, providing all such trade secrets to FORBA or deleting and/or destroying any and all of FORBA's trade secrets, including the Confidential Documents, in Hagan's possession and/or under Hagan's control.

COUNT II – COPYRIGHT INFRINGEMENT

61. FORBA restates and incorporates herein by reference the allegations of each of the above paragraphs.

62. FORBA has copyrights in each of the Confidential Documents, including each of the Copied Confidential Documents.

63. FORBA has applied for a federal copyright registration for certain of the Confidential Documents, including FORBA's Guide to Dental Health Screenings, National Children's Dental Health Month presentation and Preventive Resin Restorations white paper (the "Copyrighted Documents").

64. Hagan's acts of copying the Copyrighted Documents constitute the infringement of FORBA's copyrights.

65. Hagan's aforesaid acts violate FORBA's exclusive rights to control the production and distribution of its copyrighted works and thereby constitute infringement of the Copyrighted Documents under the Copyright Laws of the United States, 17 U.S.C. § 501, et seq.

66. Because of Hagan's infringement and continued infringement, FORBA has sustained and will continue to sustain substantial injury, loss and damages.

67. Each of the Hagan's acts of infringement was willful within the meaning of 17 U.S.C. § 101, et seq.

68. Hagan's act of providing Internet links to the Copyrighted Documents and encouragement to third parties to follow those links to view and/or copy the Copyrighted Documents, constitutes contributory copyright infringement and/or gives rise to vicarious liability for infringement by others.

69. FORBA is entitled, pursuant to 17 U.S.C. § 504(b), to recover from Hagan the economic damages sustained by FORBA because of Hagan's acts of copyright infringement. FORBA is at present unable to ascertain the full extent of the monetary damages it has suffered by reason of Hagan's acts of copyright infringement, but FORBA is informed and believes, and on the basis of such information and belief alleges, that it has sustained such damage in an amount to be determined by the trier of fact.

70. FORBA is further entitled, pursuant to 17 U.S.C. § 504(b), to recover from Hagan the gains, profits and advantages she has obtained, and will continue to obtain, as a result of her acts of copyright infringement. FORBA is at present unable to ascertain the full extent of the gains, profits and advantages Hagan has obtained by reason of her acts of copyright infringement, but FORBA believes, and on the basis of such information and belief alleges, that

Hagan has obtained such gains, profits and advantages in an amount to be determined by the trier of fact.

71. Hagan's actions were willful, wanton and reckless, and further demonstrate a complete and deliberate indifference to, and conscious disregard for the rights of FORBA. Therefore, FORBA is entitled to an award of punitive or exemplary damages in an amount sufficient to punish Hagan and/or to deter Hagan from like conduct in the future.

72. Pursuant to 17 U.S.C. § 502(a), the Court should restrain and enjoin Hagan from continuing and future acts of direct and indirect copyright infringement.

COUNT III – DEFAMATION

73. FORBA restates and incorporates herein by reference the allegations of each of the above paragraphs.

74. As noted above, Hagan has made numerous false statements about FORBA.

75. Hagan knew that each of the enumerated statements was false at the time she made it.

76. FORBA and its reputation has been damaged by Hagan's numerous acts of defamation.

77. FORBA reserves the right to amend this pleading upon further information and discovery.

PRAYER FOR RELIEF

WHEREFORE, FORBA prays that:

A. Hagan, and Hagan's agents, servants, employees, attorneys, and all those persons in active concert or participation with them, be preliminarily and permanently enjoined from, directly or indirectly, (1) publishing or posting at the Hagan Web Site or any other location or in any other manner, or making available for access to others in any way, any internal and/or copyrighted documents or other information of FORBA obtained, directly or indirectly, through access to the FORBA FTP Site, <ftp://ftp.forbainfo.com>; and (2) using or disclosing any documents or information constituting trade secrets of FORBA, including FORBA's marketing materials, marketing strategy information, budgeting materials, recruitment strategy information, spreadsheets and facility information lists;

B. Hagan be ordered to preserve all evidence of her use and dissemination of the Confidential Information and not to engage in any spoliation of evidence;

C. Hagan be ordered to file with this Court and to serve upon FORBA, within thirty (30) days after the entry and service on Hagan of a temporary restraining order and/or preliminary injunction, a report in writing and under oath setting forth in detail the manner and form in which Hagan has complied with the temporary restraining order and/or preliminary injunction;

D. FORBA recover all compensatory, exemplary and punitive damages it has sustained as a result of Hagan's misappropriation of FORBA's trade secrets, infringement of FORBA's copyrights, and infringement of the Trademark;

F. FORBA recover its reasonable attorney's fees, costs and expenses;

G. FORBA recover its costs of this action and prejudgment and post-judgment interest; and

H. FORBA recover such other and further general and equitable relief as this Court deems just, proper and equitable.

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

I, Todd Cruse, being duly sworn, make oath and verify that I am Senior Vice President, Development, of FORBA Holdings, LLC, the plaintiff in this action, that I have read the foregoing complaint and have personal knowledge of the facts stated therein unless otherwise stated and that the same are true and correct.



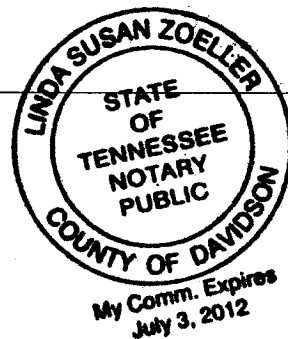
Todd Cruse
Senior Vice President, Development
FORBA Holdings, LLC

Sworn to and subscribed before me on this the 14th day of November, 2008.



Notary Public

My Commission expires: _____



Respectfully submitted,

/s/ Jonathan D. Rose 

Thor Y. Urness (*pro hac vice application pending*)

Jonathan D. Rose, Esq. (KY Bar 88547)

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Attorneys for Plaintiff

Dentist The Menace

FRIDAY, NOVEMBER 07, 2008

Don't Miss The Blog Archive

June (1)
November (5)
October (5)
September (17)
August (26)
July (26)
June (25)
May (52)
April (63)
March (8)
February (6)
January (23)

Labels/Tags

\$500 A Day Penalty If Dentists
Quit Small Smiles Without 3
Month Notice (1)

27 Corporations or Names (1)

6th Street Of Denver Dental
Clinic PC (1)

ABC I-Team Investigation (1)
abuse (9)

Academy Kids Dental (2)

Access West Dental (4)

Adolph Padula (1)

Adventure Dental and Vision (2)

Albany Access Dental Clinic (2)

Albany Access Dentistry (4)

All In The Family (1)

Americhoice (1)

Amerigroup (2)

Antavia Digsby (1)

Arcapita (1)

Arcapita Bank (1)

Arcapita Bank Only Owns
Tangible Assets of Forba (1)

Asheville (1)

Atif Abdulmalik (1)

Australia's Corporate Dental
Policy (1)

Bahrain (3)

Blog Visitors (1)

Blow Dryers (1)

Brad Padula (2)

Explosive Small Smiles Master File Shows All Clinics And So Much More

What if there was a Small Smiles (Forba) internal document that clearly showed all the clinics and the cities and states in which they operate? For instance if you go to Small Smiles website there is no indication there is a clinic in Gary, In, yet there is one, it just doesn't use the name Small Smiles.

What if this document clearly showed it still owns, operates and manages Albany Access Dentistry, the former Small Smiles busted in Albany, New York.

What if this document indicated the name of the clinic to use in advertising, what name to use on forms, what name it uses in dba's (doing business as) and what the clinic's actual legal name was?

What if this document clearly stated what to say in it's advertising, yellow page ads, and what clinics are to NEVER mention any connection to Small Smiles?

What if this document even indicated in what states an 'owner' dentists name needed to be displayed and the name/names of the dentists to use?

Would anyone be interested in seeing this document?

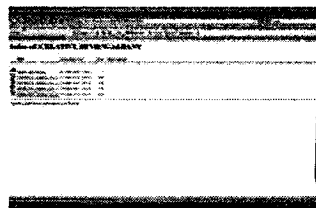
Well, now you can. Click here

If you would like to download this document you can click here.

If you try to print this out be prepared for a very large document. It's about 4 pages tall and 8 pages wide and you will have to do a lot of lining up and taping them together, it's bigger than poster size that's for sure, but very interesting to put it together, hang it up and really take a close look at it.

I'd like to think whoever it was that made all of this available online at forbainfo.com. Even though it was just a little while before it disappeared it was long enough and that's all that really matters.

Just to prove all this was once really on the web, here is a screen shot.



As you can see from the links below indexed by Google and

The links

Announcements

A new message board (forum) is now open.

Click here to access the new message board.

If you need to contact anyone at Forba-Small Smiles or need to know what position they hold in the company, you can click here for an updated corporate employee list.

or you can download it here.

It's Time For Action

NOW IS THE TIME: If you are a current or recent employee Small Smiles, a dentist would be great, and are willing to tell (on or off camera) the horrors that children suffer behind the doors of Small Smiles it's time to send me contact information. Same goes for anyone recently experiencing these horrors. Step you and tell your story, only you can help end this.

Go to bed tonight knowing you did what was right. You've prayed about it long enough, take action. If you don't speak up today, another child is injured tomorrow.

Email Me

Clickable Email Me Link

Downloads

Doral Dental Pro
Virginia

Charts (1)

Carolina Smiles (1)

Carolina West Dental (1)

Chad Hoecker (2)

Changes For Small Smiles in Maryland (2)

Children's Medicaid Dental of Charleston LLC (1)

China Dental Lead (1)

Coca Cola (1)

Colorado's New Dental Practice Ownership Laws (1)

Conscious Sedation (1)

consent form (1)

Consistency (1)

Copy of Medical Records (1)

Corporate Dental (1)

Craig Kasten (1)

Creighton (1)

Dad Tackles Dentist (1)

Dan DeRose (10)

Darren Dawson (1)

DD Marketing (1)

Dental Management Companies (2)

Dental Mill (1)

dentist (19)

dentist over billing (1)

Dentists (2)

DeRose (4)

DeRose Companies LLC (1)

DeRose Connection To China Import Company (1)

DeRose Disciples (1)

DeRose Endowed Chair (1)

DeRose Family Champiagn Contributions (1)

DeRose Football Stadium (1)

DeRose Padula Enterprises (1)

DeRose Padula Enterprises LLC (1)

DeRose Speaks (1)

DeRose's not pediatric dentists (1)

DeRose's Uncle (1)

Don Meyer (2)

Donna Gilley (1)

Doral Dental Reviews (1)

Doral Dental USA (9)

Dr. Todd Istre (1)

Dr. Adair (1)

Dr. Adolph Padula (3)

Dr. Alireza "Allen" Yekta Nazeri (1)

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[http://209.85.173.104/search?](http://209.85.173.104/search?q=cache:pqTZ43ljdW8J:forbainfo.com/GSD%26M%2520POV/Web30discussion.pdf+site:forbainfo.com+forbainfo.com&hl=en&ct=clnk&cd=52&gl=us)

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[http://209.85.173.104/search?](http://209.85.173.104/search?q=cache:nNq89hziPEkJ:forbainfo.com/Grassroots/Guide%2520to%2520Dental%2520Health%2520Screenings.ppt+site:forbainfo.com+forbainfo.com&hl=en&ct=clnk&cd=44&gl=us)

q=cache:nNq89hziPEkJ:forbainfo.com/Grassroots/Guide%2520to%2520Dental%2520Health%2520Screenings.ppt+site:forbainfo.com+forbainfo.com&hl=en&ct=clnk&cd=44&gl=us

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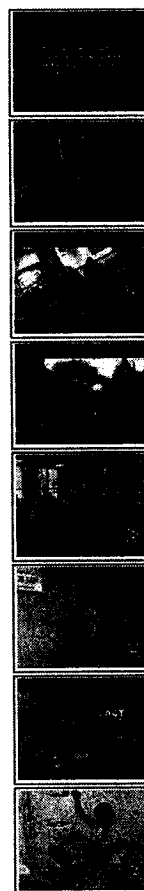
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By Phone:

1-866-893-9622

By E-Mail:

HHSTips@oig.hhs.gov

By Mail:

Office of Inspector General
 Department of Health and Human Services

Attn: HOTLINE

330 Independence Ave., SW

Washington, DC 20201

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