

BEFORE THE MEDICAL LICENSING
BOARD OF INDIANA
CAUSE NO. 2004 MLB 0033

VINOD GOYAL, M.D.,)
)
Petitioner,)
)
v.)
)
STATE OF INDIANA,)
)
Respondent.)

FILED

MAY 06 2005

HEALTH PROFESSIONS
BUREAU

FINAL ORDER

Comes now the Medical Licensing Board of Indiana, hereinafter ("Board") and hearing having been held in this matter on January 25, 2005, issues its Final Order, by a vote of 7-0, as follows:

FINDINGS OF FACT

1. This matter is pending before the Board on Vinod Goyal, M.D.'s [hereinafter "Petitioner"] petition for review of the Board's denial of his application to practice medicine in Indiana. The denial involved positive responses on his application to inquiries about previous disciplinary actions against a health license, negative action regarding staff membership or privileges and malpractice actions.
2. The Petitioner was denied renewal of staff privileges at two hospitals in Illinois. However, both involved lack of activity at the hospitals (because he was not practicing in the immediate area) and not any clinical shortcomings.
3. The Petitioner had two disciplinary actions in Illinois during the 1990's one of which involved a fine and probation and the other a reprimand and fine. Neither matter involved any clinical shortcomings. In fact, one resulted from confusion on certain fees charged in his practice and the other arose from a dispute with a landlord and another physician who were planning on opening a competing practice. Both of these matters have been some years ago and do not serve as any reason to deny Indiana licensure at this time.
4. The Petitioner has had several malpractice actions settled over his career, but none in over ten years. These actions do not serve as any reason to deny Indiana licensure at this time

CONCLUSIONS OF LAW

1. Under Indiana Code Section 25-22.5-5-2, the Board may issue a license by endorsement to qualifying individuals who are licensed in another state. However, Indiana Code Section 25-1-9-16 and Indiana Code Section 25-22.5-3-1(f) allow application denial for certain out-of-state discipline. Indiana Code Section 25-22.5-3-1(e) requires that the applicant be competent to practice and allows the consideration of malpractice settlements or judgments in making such a determination. The circumstances of this case do not make a denial appropriate.

2. Because the Petitioner has established that he meets the requirements for licensure, his application for a license may be granted.

ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Petitioner's application to practice medicine in Indiana is **GRANTED**.

ISSUED this 6 day of May, 2005.

MEDICAL LICENSING BOARD
OF INDIANA

By: _____

Frances L. Kelly
Executive Director
Health Professions Bureau

Copies to:

Vinod Goyal, M.D.
1640 N. Arlington Heights Road, Suite 110
Arlington, Illinois 60004
Certified Mail No. **7003 3110 0003 5659 5246**

John H. Sharpe
Margaret L. Smith
SOMMER BARNARD
One Indiana Square, Suite 3500
Indianapolis, Indiana 46204

208840

**MINUTES OF THE
MEDICAL LICENSING BOARD OF INDIANA**

**Meeting Held
January 27, 2005**

**9:00 A.M.
CONFERENCE CENTER ROOM C
INDIANA GOVERNMENT CENTER SOUTH
302 WEST WASHINGTON STREET
INDIANAPOLIS, INDIANA**

I. CALL TO ORDER

Dr. Krejsa called the meeting to order at 10:50 a.m. in Conference Center Room C, 302 West Washington Street, Indianapolis, Indiana and declared a quorum in accordance with IC § 25-22.5.

Members Present:

N. Stacy Lankford, M.D., Secretary
Richard Krejsa, D.O., President
Worthe Holt, M.D.
Bharat H. Barai, M.D., Vice-President
Barbara Malone, J.D., Consumer Member
Ralph Stewart, M.D.,
William H. Beeson, M.D.

Members Not Present:

Staff Present:

Angela Smith Jones, Board Director, Health Professions Bureau
Jeanette Roberts, Assistant Board Director, Health Professions Bureau
James Schmidt, Legal Counsel, Office of the Attorney General
Gordon White, Legal Counsel, Office of the Attorney General

II. ADOPTION/AMENDMENTS TO THE AGENDA

A motion was made and seconded to adopt the agenda as amended.

Lankford/Malone
Motion carried 4/0/0

III. ADOPTION/AMENDMENTS TO THE MINUTES of January 27, 2005

A motion was made and seconded to adopt the minutes of January 27, 2005.

Lankford/Malone
Motion carried 4/0/0

Motion carried 6/0/0

J.

VI. ADMINISTRATIVE HEARINGS

A.

B. VINOD GOYAL, M.D.
Cause No.: 2004 MLB 0033

Re: Appeal of Denial of Licensure

Parties and Counsel Present:

Respondent is presented by counsel John Sharpe

Participating Board Members:

Dr. Stewart (hearing officer)

Ms. Malone

Dr. Krejsa

Dr. Holt

Dr. Lankford

Dr. Barai

Dr. Beeson

Witnesses: Dr. Goyal

Case Summary: This hearing is based upon denial of licensure. He was denied licensure for answering yes to several questions on his application for licensure. Dr. Goyal presented his case to the Board. He has been practicing OB/GYN for over 30 years in Illinois. He is licensed in Illinois, Michigan and Wisconsin.

He was denied staff privileges when several years ago his privileges were non-renewed. He had not been sufficiently active to meet the volume criteria at two facilities. He did not challenge the non-renewal actions as he did not anticipate using their facilities in the future. He tried to contact Good Shepard for a letter, but they do not have records on him; however he does have privileges at several other hospitals in Illinois.

Petitioner's Exhibits: A-G were admitted.

He also answered yes to the question regarding disciplinary action taken by a state Board. The Illinois Board did discipline his license several years ago. The first was in 1992-1993 and his staff misquoted his fees. A complaint was made to the Illinois Board and he paid a fine to settle the matter. (See ex. D) the second action dealt with a landlord tenant dispute with the building landlord where his offices are. In 1997 in order to resolve the landlord tenant issue he agreed to be fined by the Illinois Board. Dr. Goyal explained his malpractice history.

Petitioner's Exhibit H: Letter from Good Shepard

He wants to come here due to the malpractice premiums in Illinois. Malpractice is to increase another 45% this July or November. He pays \$48,000 for a part time practice of doing only gynecology. If he did OB it would be \$150,000 per year.

Board Action: A motion was made to grant licensure.

Krejsa/Barai

Motion carried 7/0/0

**Bharat Barai, M.D. – President
Medical Licensing Board of Indiana**

Date

**Worthe Holt, Jr., M.D. – Secretary
Medical Licensing Board of Indiana**

Date

SOMMER BARNARD
ATTORNEYS, PC

August 25, 2004

Angela Smith-Jones
Board Director
Medical Licensing Board of Indiana
Health Professions Bureau
402 West Washington Street, Room W066
Indianapolis, IN 46204

RE: Denial of Application of Vinod K. Goyal, M.D.

Dear Ms. Smith Jones

Thank you for speaking with me yesterday. As we discussed, this law firm has been retained to represent Dr. Goyal in his appeal of the denial of his application for licensure in Indiana. Please direct any future correspondence to my attention at the downtown Indianapolis location identified below.

This letter also serves to confirm our agreement regarding the date my client's Petition for Review is due. Although the letter denying my client's application is dated August 10, 2004, the postmark on the envelope indicates that it was not mailed until August 17, 2004 (see attached). You and I agreed that the time for filing my client's Petition for Review will run from the postmark date, therefore, the Petition must be filed by Tuesday, September 7, 2004 (due to the Labor Day holiday).

If you have any questions, please feel free to contact me directly at 317/713-3500.

Sincerely,

Linda Reddington
Linda Reddington, Esq. RECEIVED

LR/kr

Enclosure

cc: Vinod K. Goyal, M.D.

AUG 26 2004
Health Professions Bureau

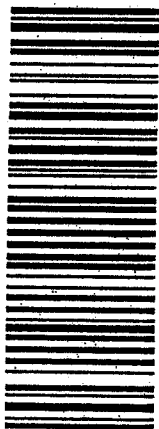
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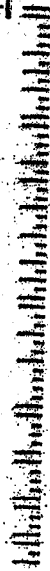


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HEALTH PROFESSIONS BUREAU
402 West Washington Street, Room 041
Indianapolis, Indiana 46204



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RECEIVED

AUG 26 2004

Health Professions Bureau

SEP 07 2004

Health Professions Bureau

September 7, 2004

Medical Licensing Board
Health Professions Bureau
402 West Washington Street, Room W066
Indianapolis, IN 46204

RE: Petition for Administrative Review
Vinod K. Goyal, M.D.

Dear Medical Licensing Board:

On January 28, 2004, Vinod K. Goyal, M.D. ("Dr. Goyal"), submitted his application for a license to practice medicine in Indiana ("Application"). On August 10, 2004, the Medical Licensing Board ("the Board") denied his Application.

The Board's stated reasons for denying Dr. Goyal's Application were based upon his "positive response" to questions regarding whether he (1) had been denied privileges in any hospital; (2) had settled any malpractice actions; and (3) had disciplinary action taken against him. As explained below, the facts surrounding each of these positive responses establish that Dr. Goyal should not have been denied a license to practice medicine in Indiana.

Dr. Goyal is submitting this Petition for Administrative Review ("Petition") pursuant to Indiana Code section 4-21.5-3-7 because he has been aggrieved and adversely affected by the Board's denial of his Application.

Dr. Goyal is prepared to appear at a hearing and present testimonial and documentary evidence in support of this Petition.

A. Dr. Goyal's educational and professional background.

Dr. Goyal graduated from the Government Medical College at Punjabi University, in Patiala, Punjab, India, in 1972. He completed his internship at St. Elizabeth Hospital, Chicago, in 1973, and completed his three-year OB-GYN residency at Mt. Sinai Hospital, Chicago, in 1976. He received Board Certification in 1980 from the American College of Obstetrics and Gynecology.

Dr. Goyal was licensed as a physician and surgeon in Illinois in 1974 and went into private practice in 1976 in Chicago. In 1980, he moved his practice to Barrington, Illinois,

Petition for Review, Vinod Goyal, M.D.
Page 2

where he practiced until 1990. During this time he also had a practice in Hoffman Estates, Illinois. In 1990, he focused his practice in the Chicago area in the Dimensions Medical Center, a full-service, multi-specialty Ambulatory Outpatient Surgical Center. He also has a practice in Arlington Heights, Illinois, and is on staff at other outpatient medical centers.

From 1976 to 1987, Dr. Goyal's practice included both obstetrics and gynecology. His wife, Vijay Goyal, also a physician, at that time had a pediatrics and general practice, and also was on call for newborns. In 1987, Dr. Goyal and his wife decided that his being on-call for deliveries at all times while his wife also was on call for newborns was creating a hardship on their family. Accordingly, at that time, Dr. Goyal ceased the obstetrics portion of his practice and focused on his gynecology practice, which he continues to do as of this date.

His current gynecological services include, but are not limited to, pap smears and pelvic exams; counseling for abnormal pap smear results; breast exams and treatment/evaluation of breast lumps, breast discharge, breast pain and tenderness; evaluation and treatment of menopausal disorders; evaluation and treatment of irregular menses, amenorrhea, dysmenorrhea, menorrhagia, anemia; infertility and hormone testing and hormone replacement therapy; ovarian cyst treatment; polycystic ovaries; cervical polyps; management and treatment of dysplasia, ASCUS, LSIL; birth control and emergency contraception options; diagnostic laparoscopy; endometrial biopsies; condyloma acuminatum treatments; testing and treatment of gynecological and urinary infections, viruses, and diseases; management of herpes outbreaks and rechecks; and evaluation and treatment of pelvic pain. His surgical services include tubal sterilization; mini laparotomies; dilation & curettage; dilation and evacuation for voluntary termination of pregnancy; laser surgery for cervical dysplasia and condyloma acuminata; colposcopy/biopsies; cervical, vaginal, vulvar, condylomas; laparoscopy; removal of bartholin cysts; excision/biopsy of lesions; and cervical laser/conization.

Dr. Goyal and his wife desire to practice to Indiana. Dr. Goyal's wife, Vijay Goyal, M.D., has already submitted an application to be licensed in Indiana, and was granted an Indiana medical license on March 19, 2004.

B. The non-renewal of certain hospital privileges for Dr. Goyal was unrelated to patient care and therefore did not warrant the denial of his application.

Dr. Goyal currently has privileges at three hospitals in Illinois: Mt. Sinai Hospital Medical Center (privileges since 1976), St. Alexius Medical Center (privileges since 1979), and Lutheran General Hospital (privileges since approximately 1997). Dr. Goyal no longer has privileges at Good Shepherd Hospital and Gottlieb Memorial Hospital, due to inactivity at those facilities.

Petition for Review, Vinod Goyal, M.D.
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From 1980 to 1990, Dr. Goyal had a practice in Barrington, Illinois. During this time, he had privileges at Good Shepherd Hospital, located in Barrington. In 1990, Dr. Goyal moved his primary practice to Arlington Heights and Des Plaines and thereafter rarely used the Good Shepherd facilities and stopped attending required meetings. When it came time to renew his privileges in Barrington, Good Shepherd noted that he had not attended enough meetings and decided not to renew.

Likewise, in the Chicago area, Dr. Goyal had privileges at Mt. Sinai Hospital Medical Center, St. Alexius Medical Center, Lutheran General Hospital, and Gottlieb Memorial Hospital. In 2000, Gottlieb determined that a "lack of clinical activity" at this Hospital prompted the non-renewal of his privileges.

Dr. Goyal's privileges at these hospitals were not renewed because he no longer used these facilities with enough frequency to meet their volume criteria for membership and privileges. The decisions not to renew had nothing to do with any concerns regarding clinical care.

C. The two disciplinary actions taken against Dr. Goyal were not based upon his "inability to safely practice medicine."

The Indiana Code provides that an applicant for a medical license "shall not have had disciplinary action taken against the applicant or the applicant's license by the board or by the licensing agency of any other state or jurisdiction *by reasons of the applicant's inability to safely practice medicine* or osteopathic medicine and those reasons are still valid in the opinion of the board." IND. CODE § 25-22.5-3-1(f) (emphasis added).

As discussed below, although there have been two disciplinary actions taken against Dr. Goyal, neither was based upon his "inability to safely practice medicine" and therefore should not have adversely affected his Application.

1. Disciplinary Action No. 93-4393-LEG

In 1992 and 1993, the Illinois Department of Professional Regulation ("DPR") received four complaints from insurance carriers alleging that personnel from Dr. Goyal's office had initially quoted his patients (their insureds) a price for procedures that was substantially lower than the amount his office ultimately submitted to the insurance company for reimbursement.

Upon review of his office procedures as part of the investigation by DPR, Dr. Goyal's office administrator concluded that the confusion resulted from the original determination by staff members that the patients qualified for reduced fees due to financial hardship. After further documentation was provided by the patients, the staff members determined

Petition for Review, Vinod Goyal, M.D.
Page 4

that these patients did *not* meet the criteria for financial hardship and therefore were not eligible for reduced fees. The patients' insurance providers were then charged the "usual and customary" fees, and these complaints ensued.

As a result of the review of office procedures following these complaints, Dr. Goyal's office identified shortcomings which allowed the confusion to happen. Working in conjunction with his office manager and the DPR, Dr. Goyal revised the initial intake forms and procedures so that a more accurate determination of financial hardship eligibility could be made at the outset, before any fees were quoted to the patient. Dr. Goyal also agreed that, with regard to those who had been quoted a financial hardship fee erroneously, he would cease any effort to collect any money in excess of the quoted fee.

DPR approved of the new forms and decided that the only action to be taken against Dr. Goyal was a probationary period of two years and a \$4,000 fine. Since the new procedures were implemented, there have been no problems regarding the manner in which financial hardship determinations are made, nor with the corresponding fees quoted to patients.

Because this disciplinary action was not based upon any allegation that Dr. Goyal was unable to safely practice medicine as referenced in Indiana Code section 25-22.5-3-1(f), it should not serve as a basis for denying his Application.

2. Disciplinary Action No. 96-14723-LEG

This action came as a result of years of non-medical-care conflict and litigation among Dr. Goyal's medical practice, Dimensions Medical Center, Ltd. and Dimensions Health Systems, Ltd. ("Dimensions"), his landlord, and the Illinois Health Facilities Planning Board/Illinois Department of Public Health ("IHFPB/IDPH").

The conflict involves office space that Dimensions leases for its primary medical clinic and fully-accredited Ambulatory Surgical Treatment Center ("ASTC"). Dimensions has been granted a "Certificate of Need" by the IHFPB/IDPH as required by Illinois statutes in order to operate the ASTC.

Around 1994, Dr. Goyal was having problems getting the landlord to maintain the building which housed the medical clinic and ASTC. The office flooded on several occasions, and the IDPH cited Dimensions for numerous structural deficiencies, including incomplete drywalling, firewall protection, and smoke barriers. The IDPH had previously raised these same deficiencies, and Dimension's landlord had previously represented to Dimensions that all of the repairs had been made and that the premises met state and federal requirements, when in fact they had not. The landlord refused to take further action and, faced with the threat of being closed down by the IDPH for failure to make the repairs

Petition for Review, Vinod Goyal, M.D.
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and the subsequent loss of Medicare licensing/funding, Dimensions sued the landlord. The court granted a preliminary injunction ordering the landlord to make repairs and authorizing Dimensions to make repairs at the landlord's expense. The court also *sua sponte* ordered that Dimensions be closed until certain repairs were made.

During this same time period, Dimensions employed a podiatrist, Dr. Weil, as part of Dimension's general practice services. Without notice to Dr. Goyal, Dr. Weil and the landlord sought a Certificate of Need ("CON") with the IHFPB/IDPH to open a competing podiatry Ambulatory Surgical Treatment practice in the same building as Dr. Goyal. The IHFPB/IDPH did not provide Dimension or Dr. Goyal with any notice of Dr. Weil's application, in violation of Illinois statutes and the IHFPB/IDPH's own regulations. In addition, Dr. Weil claimed he had political connections with an IHFPB/IDPH board member which would ensure his CON would be approved. Dr. Goyal, acting pro se (without attorney representation), challenged IHFPB/IDPH's actions with regard to Dr. Weil in state and federal court. He also moved to recuse one board member based upon Dr. Weil's statements. As a result, there was significant tension between Dr. Goyal and the IHFPB/IDPH, which evolved into ongoing litigation over Certificate of Need issues.

Due to these problems with the premises and its landlord's deficient responses to those problems, Dimensions, again acting pro se, sought to relocate its practice and applied to the IHFPB/IDPH for a Certificate of Need in a new location. During the IHFPB/IDPH proceedings on this application, Dr. Goyal recounted the deficiencies in the conditions of its present location. IHFPB/IDPH ultimately denied the application, and Dimensions was forced to stay in its current location.

Soon thereafter, the board member whose recusal Dr. Goyal had previously requested contacted the Illinois DPR and falsely alleged that Dr. Goyal had committed perjury during the IHFPB/IDPH proceedings. The DPR conducted a full investigation and completely vindicated Dr. Goyal, concluding that the allegations of perjury were baseless. The DPR, however, did find that Dr. Goyal made a single potentially misleading statement regarding the condition of the premises during the proceedings. Dr. Goyal disagreed with the DPR's conclusions as to the misleading statement. However, his attorney believed that the complaint from IHFPB/IDPH was personally and politically motivated in retaliation against Dr. Goyal's previous allegations and litigation against the IHFPB/IDPH and, therefore, fighting the complaint would be costly and emotionally draining to Dr. Goyal. Because DPR recommended the lowest possible sanction against Dr. Goyal, his attorney believed that Dr. Goyal should just accept the DPR sanction and resolve the issue. Based upon this recommendation, Dr. Goyal settled the action, paid a \$2,000 fine, and accepted a public reprimand.

Accordingly, this disciplinary action was not based upon any complaint alleging that Dr. Goyal was unable to safely practice medicine. Per Indiana Code section 25-22.5-3-1(f), it therefore should not factor into the denial of Dr. Goyal's Application.

D. The malpractice actions brought against Dr. Goyal should not serve as a basis for denying his application.

Although Dr. Goyal has been a practicing OB-GYN physician for thirty-two years, he has had only five malpractice cases which resulted in judgment or settlement against him, and three of the five cases settled for \$7,500 or less. Moreover, there have been no settlements or judgments against him in the last ten years.

The first claim against Dr. Goyal was in 1978, when he acted as an associate and surgical assistant in a cesarean section performed on the plaintiff which resulted in fetal distress. The case settled out of court in 1989 for \$284,000.

The second claim was in 1988. Dr. Goyal performed dilation-and-curettage procedure on the plaintiff. The case settled out-of-court in 1993 for \$7,500.

In the third claim, in 1989, the plaintiff alleged that Dr. Goyal failed to diagnose an ectopic pregnancy, which resulted in hospitalization and surgery. Accepting his culpability, Dr. Goyal immediately settled the case for \$100,000. As a result of this case, Dr. Goyal purchased an ultrasound machine and voluntarily instituted a new policy of performing an ultrasound whenever the patient may be pregnant. Since implementing the new policy fifteen years ago, it has substantially reduced the risk of an undiagnosed ectopic pregnancy.

In the fourth claim, the plaintiff in 1991 claimed that Dr. Goyal performed an incomplete dilation-and-curettage procedure. The case settled out-of-court in 1993 for \$7,500.

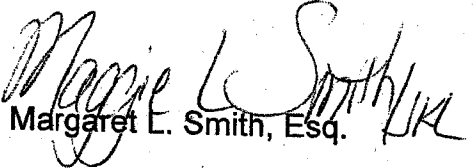
Finally, in 1994, the plaintiff claimed that Dr. Goyal failed to tell her she could experience side effects from anesthesia for several hours after surgery. She went to an emergency room only to discover that she was experiencing the side effects of anesthesia. She requested that Dr. Goyal and Access Health Center pay the \$1,010 in emergency room fees she claims she incurred unnecessarily because she believed something was wrong. After Dr. Goyal and Access Health Center agreed to pay the emergency room fees, she voluntarily dismissed the claim.

As noted above, five relatively small claims in thirty-two years in a specialty where malpractice claims are historically high should not be grounds for denial of his Application. Likewise, the fact that there have been no settlements or judgments against Dr. Goyal in the last ten years should weigh heavily in his favor.

E. Conclusion

For these reasons, we respectfully request that this Board grant a medical license to Dr. Goyal.

Best regards,


Margaret L. Smith, Esq.



Health Professions Bureau

402 West Washington Street, Room W066
Indianapolis, Indiana 46204

Telephone (317) 232-2960
Fax (317) 233-4236
<http://www.hpb.IN.gov>

August 10, 2004

Vinod K. Goyal, M.D.
1640 N, Arlington Height Road, Suite 110
Arlington Heights, IL 60004

Dear Dr. Goyal:

The Medical Licensing Board reviewed your application and supporting documentation for licensure in the state of Indiana.

According to 25-22.5-3-1 (a) (e):

- (a) The minimum requirements for all applicants for an unlimited license to practice medicine or osteopathic medicine in Indiana must include but are not limited to the requirements prescribed by this section.
- (e) The applicant shall be physically and mentally capable of, and professionally competent to, safely engage in the practice of medicine or osteopathic medicine as determined by the board and shall submit:
 - (1) to an examination; or
 - (2) additional evidence to the board;
if considered necessary by the board to determine such capability. In making that determination, the board may consider any malpractice settlements or judgements against the applicant.
- (f) The applicant shall not have had disciplinary action taken against the applicant or the applicant's license by the board or by the licensing agency of any other state or jurisdiction by reason's of the applicant's inability to safely practice medicine or osteopathic medicine and those reasons are still valid in the opinion of the board.

The Board has directed me to inform you that your application for a medical license in the state of Indiana was denied because of your positive response to question number one (1) that asks, "Has disciplinary action been taken regarding any health license, certificate, registration or permit you hold or have held?"; question number six (6) that asks, "Have you ever been denied staff membership or privileges in any hospital or health care facility or had such membership or privileges been revoked, suspended or subjected to any restrictions, probation or other type of discipline or limitations?"; and question number eight (8) that asks, "Have you ever had a malpractice judgement against you or settled any malpractice action?".


You have the right to petition for review of this decision under IC 4-21.5-3-7. The petition must be in writing and must state facts identifying the reasons for review and demonstrating that you have been aggrieved or adversely affected by the Board's decision.

According to law, the request for administrative review must be filed with the Board within eighteen (18) days from the date of this letter. If such date is a Saturday, Sunday, or legal holiday under state statute, or a day that the Health Professions Bureau's offices are closed during regular business hours, the deadline would be the first day thereafter that is not a Saturday, Sunday, or legal holiday under state statute, or a day that the Health Professions Bureau is closed during regular business hours.

If your petition for review is filed timely and review is granted, you will receive notification of an administrative hearing. You or your representative must be present at that hearing. You have the right to be represented by an attorney at your own expense. A Deputy Attorney General may be present to represent the state of Indiana. As petitioner, you will have the burden of proving you are qualified to obtain review.

If further information is needed or if you have any questions, please do not hesitate to contact this office by calling (317) 234-2060.

Sincerely,



Angela Smith Jones

Board Director

Medical Licensing Board of Indiana

CERTIFIED MAIL# 7002 2410 0002 4112 4361
RETURN RECEIPT REQUESTED

jlr