

Khosrow Tabaddor, M.D.

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QUALIFIED MEDICAL RE-EVALUATION

AIMS
P.O. Box 269120
Sacramento, CA 95826-9120

RE:	ANDERSON, TIFFANY
DATE OF RE-EVALUATION:	May 9, 2016
EMPLOYER:	San Joaquin County Mosquito & Vector Control
DATE OF INJURY:	June 19, 2008 ←
CLAIM NO:	VE0700184
FILE NO:	86351-11

40 minutes were spent in a face-to-face evaluation with the examinee.

FEE DISCLOSURE

ML 102-95: This is a Basic Qualified Medical Evaluation. **This is a medical legal report and does not qualify for a PPO/Network discount**

Thank you for the opportunity to evaluate Tiffany Anderson on Monday, May 09, 2016 in my office at 333 San Carlos Way, Ste. B Stockton, CA 95207.

The history and physical examination is not intended to be construed as a general or complete medical evaluation. It is intended for medical legal purposes only and focuses on those areas in question. No treatment relationship is established or implied.

This medical-legal evaluation is based only on the current information and records submitted. It is solely the treating physician's responsibility to determine their patient's differential diagnoses and subsequent needs for medical treatment. This would be inclusive of all psychiatric conditions, vascular diseases, neuromuscular disorders, central nervous system disorders, auto-immune diseases, internal medicine disorders and all tumors, benign or malignant, even if they are undiagnosed or currently occult.

She is 45-years-old, right-handed, 5'4 and 120 pounds.

WORK HISTORY

She began working for San Joaquin County on April 09, 2004 and kept working until December 2011, when her job was terminated.

DATE OF INJURIES

1. June 07, 2004, exposure 1.
2. January 21, 2005, exposure 2.
3. October 17, 2005, exposure 3.
4. June 19, 2008, injury to #1. *MRI 7-28-08 surgery 9-22-08 RTW 1-5-09*
5. March 26, 2009, injury to #2. *MRI 7-09 RTW 5-26-09*
6. July 02, 2009, injury #3. *MRI 3-8-10 surgery RTW 8/30/10*
7. June 29, 2011, injury #4.
8. June 29, 2011, exposure #4.
9. June 19, 2004, cumulative exposure.

She was working 8-12 hours a day, 5-7 days a week.

INTERVAL HISTORY

Summary of previous examinations:

1. June 15, 2010, QME Evaluation (incorrectly the date of evaluation was marked as June 08, 2010. The date of the injury was June 15, 2010 and apparently it was as reported and requested by the insurance company). The injured worker, reported June 19, 2008; March 26, 2009 and July 02, 2009 injuries on the questionnaire. upon completion of examination my diagnosis was; status post arthroscopy surgery of the

right knee and lateral meniscus re-tear requiring second arthroscopic surgery and chondromalacia medial and femoral condyle.

I found the patient's condition to be permanent and stationary and addressed impairment, need future medical care, work restrictions apportionment to causation.

2. Supplemental Report on August 20, I reviewed her deposition transcript and made comments that found no new information to alter my opinion as previously expressed in my QME Report dated June 15, 2010.

3. Supplemental Report on September 07, 2010.

4. Reevaluation on November 01, 2011 as related to the date of injury for June 29, 2011. My diagnosis was contusion to the right knee and leg as the result of the claimed injury of June 29, 2011, and resolved soft tissue contusion of the right leg. I expressed my opinion on Page 12 and addressed the type of treatment needed in order to control her aches and pains.

5. Qualified Medical Evaluation Report of March 27, 2012, as a result of the date of injury June 29, 2011. I addressed subjective complaints, objective findings, and impairment ratings. I also addressed the need for future medical care, work restrictions, apportionment and causation.

6. On August 29, 2012, a Supplemental Report in response to a letter received from Attorney at Law, Kyle Hanson. I recalculated the impairment ratings based upon partial lateral meniscectomy and patellofemoral pain syndrome.

7. On April 17, 2014, a Supplemental Report, I reviewed the medical records and a response letter from Kyle Henson, and I responded to all the questions asked.

8. On June 18, 2014, a Supplemental Report, I responded to a letter received from Ms. Anderson.

EXAMINATION

At 3:30 p.m., as scheduled, Ms. Anderson appeared in our office accompanied by a male companion, stating that the court had allowed her to have someone be present at the time of the interview and examination. It should be noted that she had missed two previous appointments without canceling in a timely manner. Yet, my office provided

her with half an hour of time, from 3:30 to 4:00 p.m., for interview and reexamination on May 9, 2016.

One hour prior to her arrival to the office, a man appeared with a recording device, stating that the insurance company had sent him to record the appointment with Ms. Anderson. I had no prior notification of this development, and the man himself stated that he thought he was there for a deposition of Ms. Anderson.

Upon her arrival, Ms. Anderson submitted her completed questionnaire that our office had asked her to complete. In addition to responding to the questionnaire, she had also included an additional 20 pages of unsolicited information. I was told by the man in charge of the recording device that the transcript of the interview would be provided to my office. I have not received any transcript as yet.

The summary of the dates of injuries as described by the patient are as follows:

1. June 08, 2004, she developed rash on partial body, mainly legs, while she was inspecting properties and apparently reported and received treatment about two months and her condition improved. She is still getting rashes and has not made any settlement. She complains that as a result of that, she has developed rashes on her chest, back, head, right and left arm. She did not remember if she missed any work as a result of this injury.
2. January 21, 2005, she was exposed to formaldehyde and developed rashes while she was driving a truck and a coworker was spraying an area. She developed rashes in all body parts reported and received treatment for approximately three months. She claims that exposure later affected her lungs and she developed breathing problems and anxiety and received treatment at Kaiser. She took her vacation and sick leave.
3. October 11, 2005, while she was inspecting the ditch at McDonald Island, fell inside of a ditch and developed rash, cold, flu, headaches and received treatment using her health insurance.
4. June 19, 2008, she was assigned to a new job and climbing on and off the back of her truck and injured her right knee, developed swelling and pain and she claimed a workers compensation injury and underwent right knee surgery. She was out of work for approximately six months.

5. March 29, 2009, she claims that her right knee became swollen when she was picking up branches and bushes. She reported the incident, and received some treatment. Apparently the workers compensation denied further treatment, but she took two months of vacation and then returned to regular duty.

6. July 02, 2009, she did not recall the nature of the industrial accident and a second surgery on the right knee was required, which was on March 08, 2010. She stayed off of work from July 02, 2009 until November 2009. On December 2009, she returned to work for 30-days, and performed modified duty. She was paid partially as a result of temporary disability.

7. June 29, 2011, she was on property doing daily duties walking along the side of a mound, when the right knee was injured hitting a metal stake into her surgical scar. She claimed that it cut her open from the knee all the way down to the ankle. She reported it. Four days later she was seen by Dr. Eck, but no treatment was provided. She received oil and massage therapy on her own from a massage therapist.

She handed me several typed pages asking questions, making accusations in terms of the medical treatment received, periods of temporary disability, permanent and stationary status and her benefits.

JOB DESCRIPTION

She described her job duties, in her handwriting, on the first page of the questionnaire as follows: "...My job description requires a California State Department of Public Health Certification in Category A-Pesticide Application and Safety Training for Applicators of Public Health Pesticide and Category B-The Biology and Control of the Mosquitoes in California."

She further states that her job requires that she "be an expert in pesticide applications, keeping records in compliance with all governing laws and agency well versed in county agriculture and crops, US waterways, irrigation districts, maintained driving safety at night and in isolated unknown territory and by day in the heavy traffic while reading maps and treating storm drains. The job required to hold 25-pound bucket of chemicals in her hand." She also stated that she had to drive and operate work trucks with 50-gallon tanks and 200-gallon tanks. She had to work at the White Slug Fish Hatchery pulling 50-100 feet across the ponds for the fish to use, in attempt of pesticide reduction. She claims that the biological and chemical use in agriculture was never disclosed to employees who handled the water and fish daily. She was

working in dirty water by pollution, toxic organic chemicals and animal waste water, as well as human waste water, which was a routine task.

PRESENT COMPLAINTS

On Page 5 of the questionnaire, in discussing her present complaints, she states "...in terms of medical fraud, I was exposed to formaldehyde by your client from 2004 until 2010 and told by county DEA office in 2011. From 2006-2010, I was involved in a stress claim, your client was guilty of fraud and using unpaid claims money. My claims have been valid and the last time I appeared at your office, you told me to leave..." She continues, "...I have lost over \$1,000,025 dollars in wages and benefits because you refuse to abide by an oath and hide behind the work comp laws. I am in severe need of medical treatment and have been neglected care and you play the pivotal role in providing me medical care..."

She claims that her mother died. The rest of her handwriting was illegible, and the undersigned was not able to decipher the claim.

On the same page 5 of the questionnaire, and on the pain drawing chart, she claims having sharp pain to right and left shoulders. She marked having sharp pain in the right and left elbows and sharp pain in the lower back, sharp pain and dull pain in her right hand, sharp and dull pain to the right and left knee, and dull pain to the right and left foot, and neck pain and headaches.

On Page 6 of the questionnaire, she states that the intensity of her aches and pains is about 8 on a scale of 0-10 and there is stiffness, tingling, numbness, weakness, swelling, grinding, locking and giving way without explanation of what body parts. She claims she cannot return to her occupation.

Once I began asking her about her present complaints of having pain in different body parts starting from her neck pain and headaches, her behavior and demeanor drastically changed. She became evasive, unresponsive, and accusatory. For example, when I asked her to provide specific description of her complaint and the incident she believed caused the injury and pain, she would not answer the questions directly. As to her headaches, she asserted that it started in 2004 and 2005, and the neck pain in 2011, but could not relate her symptoms to any of her industrial accidents. I made several attempts to clarify the situation but was met with persistent indirect and indecipherable responses. In addition, she accused me of being an agent of the insurance company and her employer.

RE: ANDERSON, TIFFANY

Page 7

Based on her behavior described above, I stopped the interview and recommended that we continue it on another date. After a short break, I returned in the hopes of being able to complete the evaluation. Ms. Anderson was still present in the office waiting room. She was returned to the examination room, but once I tried to question her about her current complaint, I was met with the same behavior. Therefore I had to stop the interview again. Because of her attitude and mannerism, I was not able to complete my interview and perform a physical examination in the required unbiased mode.

Should the parties decide to have this examination completed, I need to have Ms. Anderson directly answer the questions posed to her, and refrain from accusing me, the insurance company, or any of the doctors of collusion or illegal activities. She needs to be coherent and clear regarding her complaints and what she believes caused her injuries. Without her cooperation and compliance, I will not be able to adequately and appropriately evaluate Ms. Anderson.

By way of a generalized observation and my previous evaluations of Ms. Anderson, it appears that many of her complaints stem of allegations of chemical exposure. Thus, she would benefit from an evaluation by a qualified dermatologist or allergy specialist.

Thank you for the opportunity to evaluate this examinee. If I may be of additional assistance please correspond with me, in writing, at 8221 N. Fresno St, Fresno, CA 93720.

ATTESTATION

I, Khosrow Tabaddor, M.D., personally took the examinee's history, reviewed the medical records, performed the physical examination, and dictated this report. All of the opinions expressed in the report are mine.

I hereby declare under penalty of perjury that I have not violated Labor Code Section 139.3 and have not offered, delivered, received or accepted any rebate, refund, commission, preference, patronage, dividend, discount or other consideration for any referral for examination or evaluation by a physician.

I declare under penalty of perjury that the information contained in this report and its attachments, if any, is true and correct to the best of my knowledge and belief, except as to information that I have indicated I received from others. As to that information, I declare under penalty of perjury that the information accurately describes the information provided to me and, except as noted herein, that I believe it to be true.

Sincerely,

RE: ANDERSON, TIFFANY

Page 8



Khosrow Tabaddor, M.D.
Orthopaedic Surgeon

Signed this 6 day of June 2016 in LA County in the State of California.