

**BEFORE THE  
STATE BOARD OF REGISTRATION FOR THE HEALING ARTS  
STATE OF MISSOURI**

<b>STATE BOARD OF REGISTRATION, FOR HEALING ARTS</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 2008-000868</b>
	)	
<b>KRISHNARAO V. REDNAM, #34801-004</b>	)	
	)	
<b>Respondent.</b>	)	

**JOINT STIPULATION OF FACTS**

COME NOW the parties through their respective counsel of record and hereby stipulate and agree as follows:

1. The State Board of Registration for the Healing Arts (hereinafter the "Board") is an agency of the State of Missouri created and established pursuant to §334.120, RSMo, for the purpose of executing and enforcing the provisions of Chapter 334, RSMo.
2. The Respondent, Krishnarao V. Rednam, M.D., was licensed by the Board as a physician and surgeon, license number R1D78. This license was first issued on June 13, 1983 and expires on January 31, 2009.
3. Dr. Rednam is also licensed to practice medicine in the state of Illinois and Indiana. His license in Indiana is currently inactive. His Illinois license was first issued on November 27, 1978 and expired on July 31, 2008.
4. Dr. Rednam was employed between 1983 and late-January 2008 at St. Louis Eye Clinic, 135 West Adams, Kirkwood, St. Louis, Missouri.

5. On or about April 11, 2008, the Respondent was convicted of one felony count of obstruction of a criminal investigation of a health care offense in the United States District Court, Eastern District of Missouri.<sup>1</sup>

6. The basis for this charge is that from approximately April 2007 through May 2007 Dr. Rednam removed or destroyed files in his care that were necessary for the Government's investigation into criminal health care offenses at the Clinic.

7. Dr. Rednam admittedly made a critical mistake in judgment by preventing, obstructing, misleading, and delaying communication of material records and information to criminal investigators.

8. Dr. Rednam was collecting data and information for a mutual disclosure with his employer to the government; through counsel, to disclose a reimbursement issue which arose after an audit of St. Louis Eye Clinic's revenues.

9. The reimbursement issue involved the charges and dispersions of Macugen, Avastin and Lucentis.

10. On his own initiative and at his own expense, Dr. Rednam prepared a list of all of the patients involved and gave this list to the Government, allowing the Government to conduct its investigation more efficiently and thoroughly.

11. He made calculations of his inventory, drugs used, and patient charges.<sup>2</sup> Dr. Rednam's findings corroborated the government's knowledge of the nature and conduct of the offense, allowing them to rely upon their [calculations] which ultimately facilitated the resolution of the case.

12. In doing so, Dr. Rednam provided substantial assistance to the Government investigation of the Clinic, attempting to reverse his earlier attempts to obstruct.

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<sup>1</sup> See Ex. 1, (Judgment in a Criminal Case).

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13. Lastly, Dr. Rednam has consistently demonstrated he is willing to directly accept responsibility for his conduct.

14. Dr. Rednam's compassion and care is evidenced by the accompanying letters from patients,<sup>3</sup> a peer physician,<sup>4</sup> and lifelong friends.<sup>5</sup> Further, charity and

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<sup>3</sup> Submitted contemporaneously to this memo are letters from Dr. Rednam's patients. See Ex. 5 to 107, (Letters from patients). For example, Paula L. French wrote:

I have great admiration for Dr. Rednam. I have always considered him to be a prime example of a skillful, professional, and caring physician. I was impressed from the beginning with the meticulous and thorough manner with which he conducts his examinations. He was always willing to take as much time as needed to answer my questions. I have observed this same caring and thoughtful attitude toward others as well. He is truly a supportive and sympathetic care giver.

Ex. 48, (Letter, Paula L. French, February 4, 2008). Mary Catherine Riegerix wrote:

If it were not for [Dr. Rednam's] knowledge, his help and his constant true concern for his patients, I know I would not be doing the things that I am still able to do. To this day, I am still driving myself and I am fully independent. Losing my eyesight would have been a tremendous blow to me and I thank God for Dr. Rednam, his associates, and all of his staff for everything they have done for me.

Ex. 88, (Letter, Mary Catherine Riegerix). Gary A. Smith wrote:

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19. After learning of the investigation and engaging an attorney, Dr. Rednam, in cooperation with the United States, directed his attorneys to conduct a complete internal review of patients impacted.

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21. Dr. Rednam received responses from 59% of the notified patients of which 22% reported that their vision had not changed, and 66% responded that Dr. Rednam's treatment improved their vision.<sup>9</sup> None have reported any harm.

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23. Indeed, several patients sent letters after they received these Notices and subsequent Part C repayments affirming their trust in Dr. Rednam's abilities.<sup>10</sup>

24. In fact, Dr. Rednam experienced no downside in his practice after the letters were sent to patients.

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30. Demonstrative of his commitment to excelling as an ophthalmologist and retinal specialist, and in an effort to continue to learn and gain knowledge that will allow him to better aid his patients, Dr. Rednam has recently completed professional certifications in Advanced Cardiac Life Support (ACLS),<sup>13</sup> Advanced Trauma Life Support,<sup>14</sup> Financial Services, Basic Banking, Money Management and Credit Training Curriculum,<sup>15</sup> and Personal and Employment Development Curriculum.<sup>16</sup> He has also completed the Pediatric Advanced Cardiorespiratory and Trauma Support Certification (PALS) on April 29th.<sup>17</sup>

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**RESPONDENT'S FACTS AND EXHIBITS**

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Respectfully submitted,

HUSCH BLACKWELL SANDERS, LLP

By: 

HARVEY M. TITTLEBAUM, #20005

Monroe House  
235 East High Street, Suite 200  
Jefferson City, MO 65101  
Telephone: 573/635/9118  
Facsimile: 573/634/7854  
Email: [harvey.tittlebaum@huschblackwell.com](mailto:harvey.tittlebaum@huschblackwell.com)

ATTORNEYS FOR RESPONDENT