

CAUSE NO. 76357

ESSENT PRMC, L.P.,  
Plaintiff,  
vs.  
JOHN DOES 1- 10,  
Defendants. )  
IN THE 02 COURT  
OF  
LAMAR COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION AND EX PARTE REQUEST TO NON-PARTY TO DISCLOSE INFORMATION**

Plaintiff, Essent PRMC, L.P. ("PRMC"), by its attorneys, and for its complete relief claims  
Defendants John Does 1 - 10 ("Defendants") pleads that discovery should be conducted  
accordance with a tailored discovery control plan under Civil Procedure Rule 196  
Plaintiff further states as follows:

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BY  
DEPUTY

**Introduction**

This is an action for defamation, business disparagement and purported violations of the Health Insurance Portability and Accountability Act ("HIPAA"), which also give rise to claims for breach of contract and breach of an employee's duty of loyalty. The Plaintiff owns and operates Paris Regional Medical Center (the "Hospital"). With over 900 employees and more than 300 beds, the Hospital offers comprehensive health and wellness care in Northeast Texas and Southeast Oklahoma. Starting in approximately March 2005, an individual who has refused to identify himself, began a blog<sup>1</sup> about the Hospital. Since that time, the blog's host has embarked on a campaign to unfairly disparage and criticize the Hospital, its employees and the doctors who admirably serve patients there on a daily basis. Numerous postings on the blog

<sup>1</sup> A blog, as it is operated here, is a website on the internet on which the host and administrator publishes his/her own statements and subsequently supplements that material with selected excerpts from contributions by individuals who write the blog's host in the hopes of having their material added to the website.

contain defamatory statements, disclose confidential patient health information and are otherwise actionable under federal and state law. The Plaintiff seeks damages and other relief for this unlawful conduct.

### The Parties

1. Plaintiff PRMC is a limited partnership organized and in good standing under the laws of the State of Delaware with its primary place of business in Paris, Lamar County, Texas.
2. Defendant John Doe Number 1 (hereinafter "the Blogger"), upon information and belief, is an adult citizen residing at an unknown address.
3. Defendants John Does Numbers 2 through 10 (hereinafter respectively "Doe #2 - 10"), upon information and belief, are each individual adult citizens residing at unknown addresses.
4. Venue is appropriate in this judicial district pursuant to Tex. Civ. Prac. & Rem. Code Ann. § 15, as it is the county in which all or a substantial part of the events giving rise to the claim occurred and it is the county in which Plaintiff maintained a principal office at the time of the accrual of a cause of action for libel.

### The Plaintiff

5. Plaintiff has expended substantial time, money, effort and other corporate resources in developing and maintaining close and continuing relationships and goodwill with its past, current and potential future customers.
6. Through its efforts and expenses in the management and operation of dual hospital campuses located in Paris, Texas, PRMC has established itself as the preeminent provider of comprehensive health services, including acute care, for northeastern Texas and southeastern Oklahoma.

7. The market for medical services is a competitive one. PRMC has developed and maintained state-of-the-art facilities through substantial expenditures in money and other resources in a continuing effort to provide superior access to medical services with comparable quality to hospitals in Dallas, Texas.

8. PRMC is a covered entity under HIPAA, which applies to health plans, health care clearinghouses, and health care providers which transmit health information in electronic form. 45 C.F.R. §164.104 (2007).

9. Recognizing that advances in electronic technology pose a risk to the privacy of an individual's health information, Congress incorporated into HIPAA provisions that mandated adoption of privacy protections for individuals seeking health care. See Office for Civil Rights, U.S. Dept. of Health & Human Servs., *Summary of the HIPAA Privacy Rule* (2003). While Congress recognized health care providers' "strong tradition of safeguarding private health information", it adopted standards for safeguarding the privacy of individually identifiable information out of a growing concern to protect patients' medical privacy as technology increases the ease of information storage and transmission. See U.S. Dept. of Health & Human Servs., *Standards for Privacy of Individually Identifiable Health Information: Guidance Issued July 6, 2001*, <http://www.hipaadvisory.com/regs/finalprivacy/gwhole.htm> (last visited June 13, 2007).

10. To that end, HIPAA limits the disclosure by covered entities of "individually identifiable health information," which includes information created or received by a health care provider as it relates to "the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual . . ." and which either identifies the

individual or "[w]ith respect to which there is a reasonable basis to believe the information can be used to identify the individual." 45 C.F.R. §164.501 (2007).

11. Under "General Penalty for Failure to Comply with Requirements and Standards" of Public Law 104-191, the Office for Civil Rights (the "OCR") may impose fines on covered entities for each instance of noncompliance. Individuals who disclose individually identifiable health information may be fined up to \$50,000 and imprisoned up to a year and, if the offense is committed for personal gain or with malicious harm, the fine may be up to \$250,000 and imprisonment may be up to 10 years.

12. HIPAA also imposes upon covered entities, such as PRMC, an affirmative duty to "have and apply appropriate sanctions against members of its workforce who fail to comply with the privacy policies and procedures, . . ." 45 C.F.R. §164.530(e)(1) (2007). Additionally, PRMC has a duty to account all disclosures of protected health information over a period of six years when so requested by any individual, §164.528(a), and to "mitigate, to the extent practicable, any harmful effect that is known to the covered entity of a use or disclosure of protected health information in violation of its policies and procedures . . ." §164.530(f).

13. Until their exact number and identity is known employees who have disseminated information in violation of HIPAA are identified in this Complaint as Does #3 - 10.

#### **The Defendants' Wrongful Conduct**

14. On or about March 10, 2005, the Blogger, using the aliases "fac\_p" and "Frank Pasquale", created an internet weblog titled "The-Paris-site" and located on the World Wide Web at <http://the-paris-site.blogspot.com/> (hereinafter "the Blog").

15. The Blogger's alias and assumed persona of Frank Pasquale is apparently intended to mislead readers of the Blog to think that the Blogger is Frank Pasquale, Associate

Professor of Law at Seton Hall Law School. Although the real Professor Frank Pasquale is a regular contributor to several other blogs, including ones written about healthcare issues, he denies any affiliation to the Blog or the Blogger and was unaware that the Blogger had appropriated his identity until it was brought to his attention by Plaintiff.

16. From its creation, the Blogger has been, and continues to be, the maintainer, operator and contributor to the Blog. The Blogger's internet service provider for the operation of the Blog is SuddenLink Communications, Inc. ("SuddenLink").

17. The Blog is readily available to all members of the public, in the United States and throughout the world, who have access to the internet. Between February 1, 2006, when the Blogger first started to track such data on the site, and June 7, 2007, the Blog has been visited 169,272 times from sites throughout the United States and the rest of the world.

18. Any potential customer or patient of the Hospital who uses internet resources to search for medical health care in the geographic area might be directed to the Blog. For example, any member of the public performing a search on Google, a common internet search engine, for the terms "Essent PRMC", "Essent Paris Regional Medical Center" or "PRMC recommendation" is provided with a direct web-link to the Blog in the list of top ten results. A search on Google for the terms "PRMC opinion" or "Paris Regional Medical Center opinion" returns a direct web-link to the Blog among the top twenty results.

19. Despite the Blog's claim that the site is "not an anti-Essent blog," the Blogger's postings on the Blog and on other sites demonstrate that the Blog has as its sole purpose to conduct a one-sided attack and disparagement of the Hospital, PRMC and their employees and doctors, and is in no manner intended to be an open and fair discussion of issues.

20. The Blogger has not limited his biased and false attacks on PRMC to the Blog, but has also made similar false accusations on other forums which are dedicated to the discussion of medical issues. For example, on or about March 26, 2007, the Blogger, in an attempt to defend the content of the Blog and in a transparent admission to his malicious intent to deceive Blog readers, published the following statement on "Hospital Impact," <http://www.hospitalimpact.org/>, a blog dedicated to the discussion of hospital administration and leadership:

Sensationalism sells, bunky. One can write an article that is factual, to the point, and nothing left out...and no one reads it. The same article put in the perspective of the public persona generates identification. That is what generates readership.

Does it cheapen the message? Possibly, but if no one hears the message, what value does it have to cheapen?

21. The Blogger's comments on Hospital Impact also provide a "live link"<sup>2</sup> to the Blog, thereby potentially redirecting readers of Hospital Impact to his other attacks and admittedly false statements concerning PRMC.

22. On the Blog, hiding behind his anonymity and highlighting his malicious intent, the Blogger has also made the following comments:

-- Until Essent takes a reversal in direction, or just sells us, I'm going to burrow through their garbage and show it to the world.

So, Dicky [Richard Salerno, interim PRMC CEO], get ready for a rough ride. You and your bud better have some deep pockets...

(On or about Mar. 22, 2007).

-- Management,...what management?! PRMC could not possibly be handled any worse. . . . [A]t this facility I am held back by either too much politics or dunder-headed policies made by people who have no idea what they are doing!

(On or about Jan. 4, 2007).

-- People are going to die because of what this hospital has become . . . .

(On or about Jan. 11, 2007).

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<sup>2</sup> Live links redirect readers who click with their mouse on the highlighted link to a different web site - in this case to the Blog.

-- What burned me on the facility was the policies brought down from Nashville- total disregard for employee handling procedures, reliance on agency personnel (who I feel are just as competent as any home-guard folks hands down), your mismanagement of the radiology affair, and the reliance on a former typist to handle the complex position of human resources.

....  
What is the result of your leadership? Increased patient census (at other hospitals, not PRMC), low morale, general distrust among the locals. You may have the Paris News bamboozled or bought off, but not me. Not us. . . .

(On or about Jan. 25, 2007).

-- This isn't Nashville, or Boston, or Dallas, or Austin. It is a community that you wounded and are sucking out the life's blood. We don't like your style of vampires.

(On or about Mar. 12, 2007).

23. On or about February 13, 2007, Doe #2 provided the following false and defamatory statement to the Blogger with the intent that it be published to the public on the Blog on a thread entitled "Medicare Fraud Raises Its Ugly Head", and such statement was published:

The facts are that Medicare fraud responsibilities are spread out and inclusive of the organization and people involved in it. If the appropriate watchdog committees and compliance measures were NOT in line (we all know this was not the case) adhered to, employees trained in, etc, etc, then in Medicare's eye, you are guilty, PERIOD! No name calling, or laying the blame on ONE individual. Recompense is gathered from many, including the buffoonish corporation that felt THEY were above compliance of any kind. This applies to CEO's, HR directors, right down to the billing/coding staff. The fines are stiff and on a per incident occurrence, per day level. And the nasty little secret is that Medicare let's you hang yourself for awhile until you're good and caught. Once the mechanism for scrutiny and auditing [sic] is engaged, it gets really nasty, thorough and expensive. NOTHING will be missed, nor forgiven, especially when found that the preventative measures E\$\$ent has/had were insufficiently made, kept and practiced. Hud won't be able to simply walk off on this one, OR file bankruptcy, it don't happen that way, the Feds GET their money, and place those responsible in jail.....period. And I truly hope they skin, tan and hang Hud's and cronies hides on the wall for all to see. Think Hud bucked up against the wrong folks this time, and no amount of two-steppin', sweet talkin', paper shredding, fast writin' on policies will get his butt and buddies off the hook. Can you say "RUED, SCREWED AND TATOED" [sic]?

My, my, perhaps there is gonna be a little justice for these schmoes after all.

24. On or about February 13, 2007, the Blogger, under his assumed alias of Frank Pasquale, published the following false and defamatory statement on the "Hospital Impact" blog:

Apparently Medicare fraud is in the air, and PRMC is looking for a scapegoat. Billing practices from the rehabilitation unit are suspect, as well as vascular ultrasound studies billed by the hospital, but done by unregistered technologists.

25. On or about January 11, 2007, the Blogger published the following false and defamatory statement on the Blog:

And with low-census, has it gotten better? Are the lights answered quicker? Is the incidence of MRSA [Methicillin-resistant Staphylococcus aureus bacteria] lower? Post-surgical complications lower? Nope.

26. Hospital employees and contract employees review and sign the "Essent Healthcare, Inc., Employee/Contract Labor Agreement Not to Reveal Confidential Matters" (hereinafter the "Employee/Contract Labor Confidentiality Agreement"). In the Employee/Contract Labor Confidentiality Agreement, the employee pledges not to "at any time during or after [employee's] relationship with the Hospital disclose any patient information to any person whatsoever . . .", and the employee acknowledges that a violation of said agreement constitutes grounds for termination of their "employment/contract relationship with the Hospital." Hospital employees also sign the Hospital's policy on electronic communications (the "Electronic Communications Policy"), whereby the employee agrees not to disclose, through a Hospital or a personal computer, any patient or medical staff confidential information to an online forum or blog.

27. Hospital employees also receive the "Essent Healthcare, Inc., Employee Guide to Privacy & Security" (the "Employee Privacy Guide"), which outlines HIPAA requirements and potential fines for violations. Employees acknowledge in writing their review of the Employee Privacy Guide and their understanding that, in order for the Hospital to comply with HIPAA and



to protect sensitive and private information about individuals who have entrusted the Hospital to do so, each employee is not to use or disclose confidential information. The employees also acknowledge that a violation of the privacy and security policies could result in sanctions.

28. On or about March 16, 2007, the Blogger published the following statement on the Blog, indicating that the Blogger is regularly provided by Hospital employees, Does #4-10, with patient health information, the disclosure of which, even if only to the Blogger and never published by the Blogger to other persons, constitutes a violation of HIPAA requirements and standards:

In most cases in this blog, the events are so generalized that the patients are unidentifiable, except when the actual patient is posting. Of course in such a large population, we could be talking about your next-door neighbor, and not know it. With 25,000 people, it's a totally different scenario.

I've pulled a few, but generally comments are sticking to HIPAA guidelines. A couple of the ones I pulled were by the patients, but what I felt might have been regretted later. Some were employee/patients which might have gotten them in trouble, and one was a serious breach, which I couldn't condone.

I did publish one employee/patient issue, which was only identifiable through her medical treatment, but the last I heard, she was still employed. That might have changed...but she gave permission.

29. On or about January 11, 2007, the Blogger also stated on the Blog:

I have had numerous emails that related directly to the care and treatment of patients in the hospital.

30. On or about April 26, 2007, Doe #3 provided the Blogger with very specific information which if true would constitute a violation of HIPAA requirements against the disclosure of information about an individual "with respect to which there is a reasonable basis to believe the information can be used to identify the individual." In the disclosure, which the Blogger promptly published on the Blog, Doe #3 described an elevator conversation between "[a] nurse and a suit" whereby inflammatory details of the circumstances surrounding a patient's

death were disclosed. The disclosure and publication of these statements was made before the family of the patient was notified of the circumstances surrounding the death, but the details provided by Doe #3 and the Blogger were sufficient for readers, including family members, to ascertain the patient's identity. The improper and illegal disclosure in the Blog of the information is especially egregious because further investigation established that the initial report of circumstances around the patient's death were incorrect.

**FIRST CLAIM FOR RELIEF**

**(Defamation *per se* -- against Defendants Blogger and Doe #2)**

31. Plaintiff repeats and realleges Paragraphs 1 through 30 which are incorporated by reference as if fully set forth herein.

32. Blogger and Doe #2 intentionally published false and misleading statements with malice, with a reckless disregard for their truth or falsity and with negligence in failing to ascertain the truth of the statements. The statements constitute a publication of defamatory facts and opinions which are actionable in that they imply the allegation of undisclosed defamatory facts.

33. Doe #2's defamatory statements, as described in paragraph 23 of this Complaint, and Blogger's defamatory statements, as described in paragraph 24, falsely accuse Plaintiff of criminal wrongdoing in the operation and management of the Hospital including, but not limited to, Medicare fraud. These statements amount to libel *per se* and defamation *per se*.

34. Statements by the Blogger and Doe #2 tended to, were designed to and did harm Plaintiff's reputation, and lowered Plaintiff in the estimation of the community and the medical services market and, further, tended to, were designed to, and did discourage third persons from associating and dealing with Plaintiff, and did otherwise injure Plaintiff. Apart from the injuries

presumed by law, Plaintiff has suffered and will continue to suffer special injuries including the loss of business opportunities.

**SECOND CLAIM FOR RELIEF**

**(Defamation *per quod* and Business Disparagement – against Defendants Blogger and Doe #2)**

35. Plaintiff repeats and realleges Paragraphs 1 through 34 which are incorporated by reference as if fully set forth herein.

36. Blogger and Doe #2 intentionally published false and misleading statements with malice, with a reckless disregard for their truth or falsity and with negligence in failing to ascertain the truth of the statements. The statements constitute a publication of defamatory facts and opinions which are actionable in that they imply the allegation of undisclosed defamatory facts.

37. Doe #2's defamatory statements, as described in paragraph 23 of this Complaint, and Blogger's defamatory statements, as described in paragraphs 24 and 25, were designed to and did harm Plaintiff's reputation, and lowered Plaintiff in the estimation of the community and the medical services market and, further, tended to, were designed to, and did discourage third persons from associating and dealing with Plaintiff, and did otherwise injure Plaintiff. As a direct result of the defamatory and disparaging statements, Plaintiff has suffered and will continue to suffer special injuries including the loss of business opportunities.

**THIRD CLAIM FOR RELIEF**

**(Breach of Contract – against Defendants Does #3 - 10)**

38. Plaintiff repeats and realleges Paragraphs 1 through 37 which are incorporated by reference as if fully set forth herein.

39. Doe #3's statement, as described in paragraph 30 of this Complaint, and the Blogger's statements, as described in paragraphs 28 and 29, evidence breaches by Hospital employees, Does #3-10, of the Employee/Contract Labor Confidentiality Agreement.

40. Violations of HIPAA requirements and standards by Does #3-10 expose PRMC to potential civil monetary penalties. In addition to increased exposure to civil sanctions, these violations of HIPAA expose PRMC to loss of goodwill and reputation in the medical services industry, and the resulting loss of business opportunities.

41. Federal regulations impose duties on PRMC to sanction any member of its workforce who violates HIPAA, to mitigate the effect of an inappropriate disclosure, and to be able to account for all disclosures of the individually identifiable information. Without intervention and assistance by this Court, Plaintiff is unable to further pursue or rectify the HIPAA violations or to educate and/or sanction employees like Doe #3 who, as described in paragraph 30 of this Complaint, have already demonstrated a willingness to broadly publish extremely sensitive and personal health and other information with the assistance of the Blogger.

#### **FOURTH CLAIM FOR RELIEF**

**(Breach of Employee's Duty of Loyalty - against Defendants Does #3 - 10)**

42. Plaintiff repeats and realleges Paragraphs 1 through 41 which are incorporated by reference as if fully set forth herein.

43. Hospital employees have contractually agreed through the Employee/Contract Labor Confidentiality Agreement, the Electronic Communications Policy and the Employee Privacy Guide to keep identifiable patient care information confidential and to not divulge such information to others.

44. Doe #3's statement, as described in paragraph 30 of this Complaint, and the Blogger's statements, as described in paragraphs 28 and 29, evidence an on-going breach by

Hospital employees of the confidence reposed in those who are in a confidential relationship, and such violations constitute a breach of the Hospital employees' duty of loyalty.

**MOTION TO NON-PARTY TO DISCLOSE INFORMATION:** Pursuant to Section 551(c), Title 47 of the United States Code, Plaintiff respectfully petitions this Honorable Court for an order directing: 1) SuddenLink to disclose the identity of the Blogger and 2) the Blogger to disclose the identities of Does #2-10. In support of this Petition, Plaintiff states as follows:

1. SuddenLink is registered with the Office of the Texas Secretary of State, and it maintains a registered agent addressed in Dallas, Texas.

2. SuddenLink is a cable operator, and the Blogger is a SuddenLink subscriber with IP address 74.193.89.67.<sup>3</sup>

3. The information requested by Plaintiff is not available from any other source.

4. In addition to the direct harm suffered by Plaintiff as a result of defamation and business disparagement by the Blogger and the anonymous contributors, irreparable harm has been caused and will continue to be caused upon Hospital patients and the public if the Defendants' conduct remains unchecked.

5. Plaintiff respectfully requests the Court's assistance in obtaining the information PRMC requires in order to comply with its federally mandated obligations and with Congress' intent to establish and enforce procedures for the protection of the medical privacy of private citizens.

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<sup>3</sup> The IP (or Internet Protocol) address is an unique identifier for each device with access to the network.


WHEREFORE, Plaintiff respectfully prays this Honorable Court as follows:

1. That Plaintiff have and recover of Defendants Blogger and Doe #2, jointly and severally, damages in an amount sufficient to compensate Plaintiff for its injuries and losses resulting from the defamation and business disparagement by Defendants Blogger and Doe #2;
2. That Plaintiff have and recover of Defendants Blogger and Doe #2, jointly and severally, punitive damages for the willful, malicious and reckless attacks on Plaintiff's reputation, goodwill and business opportunities;
3. That Plaintiff have and recover of Defendants Does #3-10 damages suffered by Plaintiff as a result of Does #3-10's breaches of contract and breaches of the employees' duty of loyalty;
4. That Plaintiff be afforded injunctive relief in the form of a permanent injunction to enjoin Defendant Blogger from posting the defamatory and disparaging statements described herein and the statements in violation of HIPAA requirements described herein;
5. That Plaintiff have and recover the costs of this action including attorneys' fees;
6. That Plaintiff have and recover such other and further relief as the Court deems just and proper.

Respectfully Submitted:

ELLIS & TIDWELL, LLP

BY: \_\_\_\_\_

  
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CAUSE NO. 76357

ESSENT PRMC, L.P.,

Plaintiff,

vs.

JOHN DOES 1-10,

Defendants.

IN THE 62<sup>ND</sup> COURT

OF

LAMAR COUNTY, TEXAS

**ORDER GRANTING PLAINTIFF'S MOTION TO NON-PARTY TO DISCLOSE INFORMATION**

IT IS HEREBY ORDERED that, pursuant to and in compliance with 47 U.S.C. § 551, SuddenLink Communications, Inc. ("SuddenLink"), disclose the identity, and any known mailing address, of its internet services subscriber with IP address 74.193.89.67 for the time period March 10, 2005, to the present. Within twenty (20) calendar days from receipt of this Order, SuddenLink must produce the required information at the office of Ellis & Tidwell, L.L.P., 101 West Houston, Paris, Texas 75460.

SIGNED this 19 day of June, 2007.

  
\_\_\_\_\_  
PRESIDING JUDGE

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## Media Statement Regarding Lawsuit

Essent PRMC, L.P. has filed suit against several unnamed defendants in the District Court for Lamar County (Texas) in response to violations of confidentiality of patient information. This lawsuit refers to web blog postings on [www.the-paris-site.blogspot.com](http://www.the-paris-site.blogspot.com).

The site's blogger has stated he has received patient information from employees of Paris Regional Medical Center (PRMC). Some of that information has appeared on the blog. This is a clear violation of the Health Insurance Portability and Accountability Act (HIPAA), which is of extraordinary concern to us and something we cannot ignore.

*Kim Fox*

It is our duty as a healthcare entity and our obligation to the community to protect our patients' rights to privacy. We are morally and legally compelled to do everything we can to stop these violations.

We understand and respect the blogger and general public's right to voice their opinions about PRMC, and welcome constructive criticism that may help us to better serve our community. However, the method used by the defendants is wholly unacceptable as it is an infringement on the confidentiality rights of PRMC patients and a breach of federal law.

This litigation process is an important step in resolving this issue quickly and efficiently and protecting the community we serve from having sensitive medical and personal information compromised.

## MEMO

DATE: June 19, 2007  
TO: PRMC Employees  
FROM: Chris Dux, CEO  
SUBJECT: HIPAA Violation

It is our duty as employees of a healthcare entity and our obligation to the community to protect our patients' right to privacy. In addition to this moral and ethical responsibility, we have a legal obligation to safeguard our patients' privacy under the federal Health Insurance Portability and Accountability Act (HIPAA).

You all know of the-paris-site blog. The blogger has stated he has received patient information from employees of PRMC. Some of that information has appeared on the blog, a clear breach of HIPAA. This is of extraordinary concern and something we cannot legally disregard. We are not taking this lightly. We cannot take it lightly. It is our duty to act, and I felt you should be among the first to know what those actions will be.

Today, we are filing suit against the-paris-site blogger for willful violation of federal HIPAA laws. This litigation process is the first step to resolving this issue quickly and efficiently and protecting the community we serve from having sensitive medical and personal information compromised.

Second, I would ask you to be fiercely vigilant in safeguarding our patients' privacy. If you suspect a HIPAA violation, please report it immediately. You can do that by contacting our compliance officer, Ken Miller, or anyone in Administration. In you prefer to remain anonymous, call the compliance reporting hotline at 1-800-472-8868.

Third, I want to be certain that each and every PRMC employee fully understands our legal and moral obligation to protect the privacy of our patients. Our Corporate Compliance Officer, Charles Fletcher, will be in Paris the week of June 25 to conduct refresher training on our responsibilities under HIPAA. Classes will be offered at numerous times and dates throughout the week, and all employees will be required to attend.

We understand and respect the blogger and the general public's right to voice their opinions about PRMC, and welcome constructive criticism that may help us to better serve this community. However, the method used by the blogger is wholly unacceptable and it is an infringement on the confidentiality rights of PRMC patients and a breach of law. I hope you will join me in protecting our patients and putting a stop to the blogger's unlawful access to information to which he has no right.