

SPECIFIC FELONY ALLEGATIONS against Robert E. Morrison (CEO of Randolph Hospital and Secretary/Treasurer of Randolph Medical Associates) and Steven E. Eblin (Vice President of Corporate Planning & Development at Randolph Hospital and President of Randolph Medical Associates):

1. On **October 4, 1999** Steven E. Eblin, both as an individual and in his capacity as Vice President of Randolph Hospital & President of Randolph Medical Associates, did unlawfully commit **PERJURY** in sworn deposition in discovery in a civil action in Superior Court in Randolph County (**Responses by Defendant Randolph Medical Associates to Plaintiff's First Requests for Production of Documents, Question #7**), wherein Dr. Mary H. Johnson (M.D.) was the Plaintiff and Randolph Medical Associates, Robert Morrison, Steven Eblin and Michael Bridges were Defendants (99 CvS 161), by falsely asserting that all documents which reflect, relate to, or in any manner memorialize the Plaintiff's quarterly and annual earnings on behalf of defendant Randolph Medical Associates for the years 1995, 1996, 1997 and 1998, including without limitation any documents pertaining to gross revenues, net revenues, profits and losses were "confidential".

2. On **December 21, 2000**, Steven E. Eblin, both as an individual and in his capacity as Vice President of Randolph Hospital & President of Randolph Medical Associates, did unlawfully commit **PERJURY** in sworn deposition in discovery in a civil action in Superior Court in Randolph County (**Responses by Randolph Medical Associates to Defendant's First Requests for Production of Documents, Questions #6, 7, & 8**) wherein Randolph Hospital, Randolph Medical Associates, Robert E. Morrison, Steven E. Eblin and Michael Bridges were Plaintiffs and Dr. Mary H. Johnson (M.D.) was the Defendant (00 CvS 1033), by falsely asserting (in **Question #6**) that all documents which reflect, relate to, or in any way memorialize the Defendant's quarterly and annual earnings on behalf of Plaintiff, Randolph Medical Associates for the years of 1996, 1997, 1998, including but not limited to any documents pertaining to gross revenues, net revenues, profits and losses had been produced in discovery in another/previous civil action: Johnson v. Randolph Medical Associates, 99 CvS 161. Mr. Eblin, in fact, withheld those documents (see complaint #1 above), claiming they were "confidential". Mr. Eblin falsely asserted (in **Question #7**) that all documents which reflect, relate to or in any way memorialize all profits, losses, gross revenues, and net revenues of Randolph Medical Associates, including but not limited to financial records of Randolph Medical Associates for the years 1995, 1996, 1997 and 1998 were "confidential". Mr. Eblin falsely asserted (in **Question #8**) that all documents which reflect, relate to, or in any way memorialize all profits, losses, gross revenues, and net revenues of Randolph Medical Associates including but not limited to financial records of Randolph Medical Associates for the years 1999 and 2000 were "confidential".

3. On **December 21, 2000**, Robert E. Morrison, both as an individual and in his capacity as CEO of Randolph Hospital & Secretary/Treasurer of Randolph Medical Associates,

did unlawfully commit **PERJURY** in sworn deposition in discovery in a civil action in Superior Court in Randolph County (**Responses by Randolph Hospital to Defendant's First Requests for Production of Documents, Questions #7, & 8**) wherein Randolph Hospital, Randolph Medical Associates, Robert E. Morrison, Steven E. Eblin, and Michael Bridges were Plaintiffs and Dr. Mary H. Johnson (M.D.) was the Defendant (00 CvS 1033), by falsely asserting (in **Question #7**) that all documents which reflect, relate to, or in any way memorialize all profits, losses, gross revenues, and net revenues of Randolph Hospital, Inc., including but not limited to financial records of Randolph Hospital for the years of 1995, 1996, 1997 and 1998 were "confidential". Mr. Morrison falsely asserted (in **Question #8**) that all documents which reflect, relate to or in any way memorialize all profits, losses, gross revenues and net revenues of Randolph Hospital, Inc., including but not limited to financial records of Randolph Hospital for the years of 1999 and 2000 were "confidential".

4. On **December 21, 2000**, Robert E. Morrison, both as an individual and in his capacity as CEO of Randolph Hospital & Secretary/Treasurer of Randolph Medical Associates, did unlawfully commit **PERJURY** in sworn deposition in discovery in a civil action in Superior Court in Randolph County (**Responses by Robert E. Morrison to Defendant's First Requests for Production of Documents, Questions #6, 7 & 8**) wherein Randolph Hospital, Inc, Randolph Medical Associates, Robert E. Morrison, Steven E. Elbin and Michael Bridges were Plaintiffs and Dr. Mary H. Johnson (M.D.) was the Defendant (00 CvS 1033), by falsely asserting (in **Question #6**) that all documents which reflect, relate to, or in any way memorialize the Defendant's quarterly and annual earnings on behalf of Plaintiff, Randolph Medical Associates, for the years of 1995, 1996, 1997, 1998, including but not limited to any documents pertaining to gross revenues, net revenues, profits and losses had been produced in discovery in another/previous civil action: Johnson v. Randolph Medical Associates, 99 CvS 161. Mr. Steven E. Eblin had, in fact, withheld that information (see Complaint #1 above), claiming it was "confidential". Mr. Morrison falsely asserted (in **Question #7**) that all documents which reflect, relate to, or in any way memorialize all money received by Robert E. Morrison, from January 1, 1996 to February 2, 1998, as compensation for his services to Randolph Hospital, Inc. and Randolph Medical Associates, including but not limited to salary, from both institutions, bonuses, and financial incentives were "confidential". Mr. Morrison falsely asserted (in **Question #8**) that all documents which reflect, relate to, or in any way memorialize all money received by Robert E. Morrison, from January 1, 1999 to September 1, 2000 as compensation for his services to Randolph Hospital, Inc. and Randolph Medical Associates, including but not limited to salary from both institutions, bonuses, and financial incentives were "confidential".

5. On **December 21, 2000**, Steven E. Eblin, both as an individual and in his capacity as Vice President of Randolph Hospital & President of Randolph Medical Associates, did unlawfully commit **PERJURY** in sworn deposition in discovery in a civil action in Superior Court in Randolph County (**Responses by Steven E. Eblin to Defendant's First Requests for Production of Documents, Questions # 6, 7 & 8**) wherein Randolph

Hospital, Inc, Randolph Medical Associates, Robert E. Morrison, Steven E. Eblin and Michael Bridges were Plaintiffs and Dr. Mary H. Johnson (M.D.) was the defendant (00 CvS 1033), by falsely asserting (in **Question #6**) that all documents which reflect, relate to, or in any way memorialize the Defendant's quarterly and annual earnings on behalf of Plaintiff, Randolph Medical Associates, for the years of 1995, 1996, 1997, 1998, including but not limited to any documents pertaining to gross revenues, net revenues, profits and losses were produced in discovery in another/previous civil action: Johnson v. Randolph Medical Associates, 99 CvS 161. Mr. Eblin had, in fact, withheld that information, claiming it was "confidential" (see Complaint #1 above). Mr. Eblin falsely asserted (in **Question #7**) that all documents which reflect, relate to, or in any way memorialize all money received by Steven E. Eblin from January 1, 1996 to February 2, 1998 as compensation for his services to Randolph Hospital, Inc. and Randolph Medical Associates, including but not limited to salary from both institutions, bonuses and financial incentives were "confidential". Mr. Eblin falsely asserted (in **Question # 8**) that all documents which reflect, relate to, or in any way memorialize all money received by Steven E. Eblin, from January 1, 1999 to September 1, 2000 as compensation for his services to Randolph Hospital, Inc. and Randolph Medical Associates, including but not limited to salary, from both institutions, bonuses and financial incentives were "confidential".

In all of the above instances of PERJURY, Mr. Morrison and Mr. Eblin swore out their answers/verifications in front of a Notary Public (either Jane Spencer Pinnix or Wanda H. Bray), and those answers were served upon Dr. Johnson's legal counsel (Steven S. Schmidly) by their attorneys, Robert A. Ford and/or Demetrius L. Worley of Tuggle, Duggins & Meschan, Inc. Mr. Ford and Ms. Worley, as both legal advisors and witnesses to the discovery responses, represented themselves to be "experts" in the representation of non-profit institutions. It was their responsibility, as officers of the Court, to ensure that Mr. Morrison and Mr. Eblin told the truth in their discovery responses.

Per Section 6104(d) of Internal Revenue Code (Public Disclosure of Material Related to Tax-Exempt Organizations), both Randolph Medical Associates and Randolph Hospital, Inc., as 501(c)(3) charities, are required to file IRS 990 returns. Those returns are PUBLIC RECORD. IRS 990 returns include documentation of a non-profit organization's profits, losses, executive & (top five highest-paid) employee compensation. Entities that file IRS 990 returns are required to provide them to any member of the public upon request in a timely fashion – or to make those returns widely available to for public inspection and direct inquiries appropriately. The information Dr. Johnson requested in discovery was therefore not in any way "confidential".

According to inquiries Dr. Johnson made in 2003, the Internet website, www.Guidestar.com, has been posting the IRS 990 returns of charitable institutions on-line since 1996, and the returns of both Randolph Medical Associates and Randolph Hospital were available for review when Dr. Johnson requested the information in

discovery. Dr. Johnson's own salary (as one of the top five highest-salaried employees at Randolph Medical Associates prior to a physician incentive program being implemented) was posted on the Internet, and she did not know it. Currently, the last three tax years are available on the Guidestar website for review by anyone surfing the Internet, older returns are now archived and available to viewing for a Guidestar membership fee. Both Randolph Hospital & Randolph Medical Associates periodically provide supplemental information to the website and actively seek grants. **Neither Mr. Morrison nor Mr. Eblin revealed the existence of the Guidestar website in their depositions** – knowing full well that much of the financial information Dr. Johnson requested in discovery was posted there – and that both Randolph Hospital and Randolph Medical Associates, as non-profits, were required by IRS Code to provide this information upon request. **Mr. Morrison and Mr. Eblin (1) knowingly lied about the financial information and salaries being “confidential”; and (2) in the alternative of providing the requested financial information, failed to reveal that it was posted on a public website.**

Furthermore, Mr. Eblin failed to comply with the Honorable Judge A. Moses Massey's order (on 10/10/2000, on a Motion to Compel in 99CvS 161) to provide the financial information to Dr. Johnson. This constitutes CRIMINAL CONTEMPT OF COURT as per North Carolina General Statute 5A-11(3): “Willful disobedience of, resistance to, or interference with a court's lawful process, order, directive or instruction or its execution.”

In discovery, Mr. Eblin, Mr. Morrison, Randolph Hospital and Randolph Medical Associates argued that the “confidential” financial information Dr. Johnson requested was “not relevant” to her claims for damages (specifically tortious interference with contract, breach of contract, negligence and slander). However, this argument is negated by (1) Judge Massey's order to produce the financial documents, (2) IRS regulations governing a non-profit's public disclosure of financial information, and (3) the posting of IRS 990 returns containing the information Dr. Johnson requested on www.Guidestar.com.

With regards to “relevancy”, at the time of her termination, Dr. Johnson was the highest-paid Pediatrician at Randolph Medical Associates with an excellent payer-mix. The actions of Randolph Medical Associates prevented Dr. Johnson's smooth transition into private practice, a transition Randolph Medical Associates subsequently afforded other National Health Service Corps physicians employed by the practice (example: Dr. Sidney Blake).

Dr. Kathleen Riley “inherited” a good portion of Dr. Johnson's practice and benefited substantially from the influx of Dr. Johnson's patients into her own practice – as well as a salary and benefit plan (based on “production”) initiated after Dr. Johnson's termination. The bonus plan was designed to put Randolph Medical Associates physicians in salary ranges on par with physicians in private practice. Therefore, Dr. Riley's salary after Dr. Johnson's departure (as disclosed on Randolph Medical Associates' IRS 990 returns), was relevant to the true value of Dr. Johnson's practice and lost income (had she been allowed to smoothly transition

into private practice), and was essential to the calculation of Dr. Johnson's damages in 99 CvS 161.

Robert Morrison and Steven Eblin's salary and benefit increases during litigation, as obtained from IRS 990 returns posted on www.Guidestar.com are included with this complaint.

Dr. Kathleen Riley's salary increases, in the wake of Dr. Johnson's (and later Dr. Anderson's) departures, are also included in this complaint. The information was obtained from IRS 990 returns posted on www.Guidestar.com. **At the time of her termination of employment in February 1998, Dr. Johnson was the highest-paid Pediatrician at Randolph Medical Associates and one of its top five highest-paid employees** (as per Randolph Medical Associate's 1996 IRS 990 return, referencing fiscal year October 1, 1996 – September 30, 1997). Dr. Johnson's salary was \$129,355 per year. Dr. Laurie Anderson left Randolph Medical Associates the following year. IRS 990 returns for 1998 (fiscal year October 1, 1998 through September 30, 1999), reveal that Dr. Kathleen Riley, whose salary had not qualified as one of the five highest-paid employees prior to Dr. Johnson's termination of employment (or Dr. Anderson's subsequent departure), made \$173,399, a salary increase of \$44,044 over Dr. Anderson's salary in 1998 (\$129,355).

Dr. Johnson received less than one-year's salary (\$125,000) as "compensation" at the settlement of 99 CvS 161 – over three years after her practice was decimated by the actions of Robert Morrison and Steven Eblin.

The "libel" lawsuit against Dr. Johnson (00 CvS 1033) was filed maliciously and its claims were ultimately completely debunked by (1) letters from Drs. Laurie Anderson and Nancy Toy supporting Dr. Johnson's version of events, (2) conclusions reached and actions taken against Randolph Medical Associates by the United States Public Health Service (i.e. the removal of Randolph Medical Associates from the National Health Service Corps' list of preferred providers – as well as the instruction to pay tail coverage on Dr. Johnson's malpractice insurance), and (3) unpublicized actions taken by the North Carolina Medical Board. The lawsuit was dismissed without even reimbursing Dr. Johnson's attorney's fees.

During settlement negotiations, Robert Morrison and Steven Eblin, in conjunction with their legal Counsel, represented Randolph Medical Associates and Randolph Hospital to be in financial difficulty and unable to pay substantial damages. The financial information (including their own salaries) provided on IRS 990 returns proves this to be a deliberate misrepresentation designed to defraud Dr. Johnson of fair and equitable damages at settlement.

Mr. Morrison and Mr. Eblin OBSTRUCTED THE PUBLIC JUSTICE when they negotiated a settlement of claims with Dr. Johnson without providing financial information relevant to her calculation of damages.

As per North Carolina General Statute 14-209, SubChapter VIII, Article 28 “Punishment for Perjury”, “If any person shall willfully and corruptly commit perjury, on his oath or affirmation, in ANY suit, controversy, matter or cause, depending in any of the courts of the States, or in ANY deposition or affidavit taken pursuant to law, or in ANY oath or affirmation duly administered of or concerning any matter or thing whereof such person is lawfully required to be sworn or affirmed, EVERY person so offending shall be punished as a Class F felon.”

U.S. Code Title 18, Part 1, Chapter 79, Sub-Sections 1621 & 1623, the penalty for perjury (per count) is imprisonment for not more than five years and/or appropriate fines.

North Carolina General Statute provides no statute of limitations on perjury.

OTHER CRIMINAL MISCONDUCT

North Carolina General Statute 90-21.22 was violated when Dr. Johnson was wrongfully subjected to retaliation for her medical Peer Review activities (as Chair of Randolph Hospital’s Perinatal Committee):

(A) In February 1998, Randolph Medical Associates fired Dr. Johnson, approximately two weeks after she (1) intervened in a medical case to save a critically-ill newborn’s life and (2) reported the case and the behavior of the involved attending physician, Dr. Michael Irwin, to Randolph Hospital peer review (a protected activity under G.S. 90-21.22). A few days prior to this incident, Dr. Johnson had been threatened with termination because of her peer review & patient/child advocacy efforts – in a memo written by then-RMA Director Michael Bridges. Mr. Bridges deemed Dr. Johnson’s activities “embarrassing” for the practice, and instructed Dr. Johnson to clear all concerns about the behavior or actions of other physicians through him. Dr. Johnson consulted physician colleagues regarding this instruction. The consensus was that Mr. Bridges’ instructions were an inappropriate attempt to interfere in physician peer review. Dr. Johnson attended the critically-ill infant in the incident referenced above knowing that Mr. Bridges might attempt to make good on his threats of termination of employment if she did so.

(B) In 2000, Dr. Johnson was sued (00 CvS 1033) for reporting her experiences as a National Health Service Corps Physician to US Department of Health & Human Services Secretary Donna Shalala. Dr. Johnson’s “exit interview” was filed in confidence to appropriate federal and state regulatory agencies, and in response to a direct request for feedback from National Health Service officials. It was labeled “confidential” on every single page. As such the complaint was clearly protected by both North Carolina General Statute as well as the National Health Services site agreement with Randolph Medical Associates/Randolph Hospital (“A Quality Improvement system shall be in place, which

may include patient satisfaction surveys, peer review systems, clinical outcome measures or similar systems.”). As per **General Statute 90-21.22(f)**, Peer Review activities conducted in good faith shall not be grounds for a civil action. The statute is intended to protect physicians who participate in medical Peer Review activities, and to encourage the free exchange of information. In theory, this improves patient care.

Dr. Johnson believes that Mr. Eblin and Mr. Morrison filed 00 CvS 1033 as a retaliatory act, acting with malice with the intent to (1) intimidate Dr. Johnson and financially & otherwise hinder her pursuit of civil justice and (2) personally and professionally humiliate Dr. Johnson in her own hometown.

00 CvS 1033 alleged “libel”. Mr. Eblin and Mr. Morrison, granted indemnity by the hospital, and using public resources to destroy a potential private-sector competitor, lied repeatedly during discovery in their own “libel” lawsuit.

(C) Dr. Johnson’s hospital privileges were rescinded in February 1999, immediately after her lawsuit against Randolph Medical Associates was filed (99 CvS 161). Randolph Hospital’s Executive Committee acted, without prior notification to Dr. Johnson, to accept a staff resignation she had previously withdrawn. Randolph Hospital’s lawyer, Robert Wilson, advised Randolph Hospital’s Executive Committee on this matter. At the time, Mr. Wilson was a corporate officer (Secretary-Treasurer) of Randolph Medical Associates. The Executive Committee does not appear to have been informed of this **conflict of interest** – in violation of **North Carolina General Statute 55A-8-31**.

A physician’s hospital privileges are a protected property right. Dr. Johnson was denied her Fifth Amendment due process rights when Randolph Hospital rescinded her hospital privileges without just cause or adequate notification that the action was being considered. This was clearly a retaliatory act and in violation of North Carolina General Statute 90-21.22(b).

Mr. Morrison and Mr. Eblin further violated North Carolina General Statute 90-21.22(b&e), when they released confidential documents Dr. Johnson had authored for purposes of (A) Randolph Hospital Peer Review and (B) North Carolina Medical Board review in discovery responses (99 CvS 161). The documents were released in an apparent attempt to portray Dr. Johnson as “disruptive”. Dr. Johnson’s Randolph Hospital Peer Review file is devoid of any documentation that supports that characterization. Furthermore Mr. Morrison and Mr. Eblin failed to produce any documents during discovery (in either 99 CvS 161 or 00 CvS 1033) that provided any substantive support to their allegations. Document (B) specifically referenced the clinical incident involving Dr. Michael Irwin that precipitated Dr. Johnson’s termination. One of the concerns Dr. Johnson addressed in her complaint to the North Carolina Medical Board was false advertising upon the part of Randolph Hospital and the involved physician, Dr. Irwin (a family practitioner), with regards to Dr. Irwin’s qualifications in neonatology. The advertising was misleading and in clear violation of **North Carolina General Statute 14-117**. Dr. Irwin subsequently released the Medical Board complaint

that Dr. Johnson authored to Mr. Morrison and Mr. Eblin. Mr. Morrison and Mr. Eblin, in turn, illegally released the document in discovery.

In releasing Dr. Johnson’s complaint to the North Carolina Medical Board, both Dr. Irwin and Randolph Hospital waived confidentiality. Document B is therefore included in this criminal complaint – with the identity of the patient blacked out.

Mr. Morrison and Mr. Eblin’s attorneys’ fees were all paid by Randolph Medical Associates and/or Randolph Hospital. Mr. Morrison and Mr. Eblin’s actions on behalf of Randolph Hospital and Randolph Medical Associates are only indemnified if they were executed in good faith. **According to North Carolina General Statute 14-254(a) [Malfeasance of Corporation Officers and Agents], the payment of Mr. Morrison and Mr. Eblin’s attorney’s fees to defend & pursue bad faith actions, obstruct justice, and defraud Dr. Johnson at settlement misapplied the funds of Randolph Hospital and Randolph Medical Associates to the personal ends of its administrators. This is a Class H felony.**

The US Treasury funds provided by the **National Health Service Corps** and the **North Carolina Office of Rural Health** to repay both Dr. Johnson’s and Dr. Laurie Anderson’s medical school loans were offered specifically to recruit and RETAIN their services as Pediatricians in Asheboro. The National Health Service Site agreement is attached. The combined public funds provided to these doctors were well over \$100,000. **By interfering in Dr. Johnson’s continued practice in Asheboro, in specific violation of Randolph Hospital’s site agreement with the National Health Service Corps, and by employing unfair business tactics that literally drove Drs. Johnson and Anderson out of Asheboro in deference to the “best interest” of Randolph Medical Associates’ Pediatric practice, Robert Morrison and Steven Eblin misapplied public funds (the Treasury Funds applied towards the loan repayment of both doctors) for a purpose other than that for which they were held (retaining the physicians’ services in an under-served area). Moreover, Mr. Morrison and Mr. Eblin personally benefited from the misapplication of these funds.** Revenues from Drs. Johnson (and later, Dr. Anderson’s) absorbed practices were credited to Randolph Medical Associates’ physicians – and applied towards physician incentive and bonus plans. The “success” of the practice Dr. Johnson built was also credited to Randolph Medical Associates & Randolph Hospital administrators, generating very large salary increases and bonuses for these employees of a non-profit enterprise. **This misapplication of federal funds is a violation of North Carolina General Statute 14-92 and is a Class C Felony.**

SUMMARY:

Robert E. Morrison and Steven E. Eblin, both as individuals and in their capacities as officers of both Randolph Hospital, Inc. and Randolph Medical Associates, knowingly PERJURED themselves FIVE and SEVEN times respectively during civil

actions pertaining to Dr. Mary H. Johnson's employment and termination by Randolph Medical Associates.

Mr. Eblin and Randolph Medical Associates defied Judge A. Moses Massey's order and withheld information from Dr. Johnson during discovery, acting in CONTEMPT of the Court. Therefore, Robert E. Morrison and Steven E. Eblin negotiated the 2001 settlement of 99 CvS 161 and dismissal of 00 CvS 1033 in BAD FAITH, and defrauded Dr. Johnson of fair and equitable damages for (1) the destruction of her Pediatric practice and (2) the defamation of her professional character in favor of Randolph Medical Associates' "best interest". These actions OBSTRUCTED THE PUBLIC JUSTICE.

BAD FAITH actions are not indemnified or in any way protected by North Carolina General Statute.

Furthermore by concealing the information Dr. Johnson requested from public scrutiny, Mr. Morrison and Mr. Eblin personally benefited from their actions, in the form of salaries and benefit packages (subsidized by public funds) that doubled or nearly tripled during litigation. Randolph Hospital and Randolph Medical Associates were far from "nearly bankrupt", as was represented to Dr. Johnson during settlement negotiations.

Dr. Johnson suffered irreparable harm because of the criminal actions of Robert E. Morrison and Steven E. Eblin. Since her termination of employment by Randolph Medical Associates, Dr. Johnson has made her living on the road as a "Locum Tenens" physician – substituting for other physicians. Dr. Johnson maintains her home in Asheboro. However, her income and standard of living have never recovered due to the actions of Robert Morrison and Steven Eblin. She has spent a good portion of the last seven years separated from her family, friends and significant other. She has suffered ridicule and professional ostracism, as well as considerable obstruction by select community leaders and law enforcement officials, in her efforts to see these matters fairly and thoroughly addressed.

All aforementioned parties at Randolph Medical Associates and Randolph Hospital benefited financially and/or professionally from Dr. Johnson's inability to re-establish her Pediatric practice in Asheboro due to (1) Robert E. Morrison's and Steven E. Eblin's unfair and monopolistic business practices (in violation of both her employment contract and Randolph Hospital's site agreement with the National Health Service Corps), (2) undue, retaliatory and malicious litigation (i.e. the "libel" lawsuit, 00 CvS 1033), and (3) Mr. Morrison and Mr. Eblin's illegal and obstructive acts during litigation.

The Pediatric patients of Dr. Johnson and Dr. Anderson were uprooted and displaced by the dishonest, malicious, retaliatory and self-serving actions of Randolph Hospital officers Robert Morrison and Steven Eblin – for reasons that

had nothing to do with good medical care – in a gross violation of parental and public trust.

The intent of Congress with regards to the mission of the National Health Service Corps was thwarted, and the U.S. Treasury funds used to recruit Dr. Johnson and Dr. Anderson to Asheboro (a medically “underserved” area) were wasted when the Pediatricians were literally driven from Asheboro to serve the “best interest” of Randolph Medical Associates.

The process of medical peer review was corrupted.

The public good was not served.

Robert E. Morrison and Steven E. Eblin, as individuals or officers of non-profit Randolph Medical Associates and Randolph Hospital, enjoyed no right of contract or law to do the things they did to Dr. Johnson. Mr. Morrison and Mr. Eblin are not above the law – no matter who they are, who they work for, or who they know.

Mary Helen Johnson, M.D., FAAP - Complainant

SWORN TO AND SUBSCRIBED TO BEFORE ME: _____ (DATE)
