UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA, and THE STATE OF WISCONSIN, ex rel. DR. TOBY TYLER WATSON,

Plaintiffs,

Case No. 11-CV-236

JENNIFER KING VASSEL,

v.,

Defendant.

AFFIDAVIT OF MONICA YEAZEL

STATE OF WISCONSIN

COUNTY OF DANE

MONICA YEAZEL, being duly sworn under oath, deposes and states as follows:

)) ss.

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1. I am employed by Health Information Designs, LLC, a subcontractor for the State of Wisconsin's Medicaid fiscal agent, Hewlett Packard ("HP").

2. I am a registered pharmacist. I have not been contacted to be an expert witness in this case. As a subcontractor of HP, HID performs Retrospective Drug Utilization Review ("RDUR") services for the Wisconsin Department of Health Services. HID's services include reviewing certain subsets of claims after payment or reimbursement for prescription medication occurs.

3. My involvement, on behalf of HID, with the RDUR Board is to present information regarding RDUR as requested by the State and to perform various administrative support duties.

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4. I do not draft any policies for the State. Before being named as a witness, I informed the plaintiff himself, who contacted me, that how prescription medications are covered and how claims are paid by Wisconsin Medicaid is outside the scope of HID's subcontract for RDUR services. In fact, HID's RDUR services are all performed retrospectively, i.e. following the State's payment or reimbursement for prescription medication.

5. I have never spoken to an attorney for the plaintiff.

FURTHER THE AFFIANT SAYETH NOT.

s/Monica Yeazel Monica Yeazel Monica Yeazel

Subscribed and sworn to before me this 26th day of November, 2013.

Notary Publić. of Commission Wisconsin 2017 expires:

