



# Oregon

Theodore R. Kulongoski, Governor

## Oregon Board of Chiropractic Examiners

3218 Pringle Road SE, Suite 150

Salem, OR 97302-6311

(503) 378-5816

FAX: (503) 362-1260

E-mail: [oregon.obce@state.or.us](mailto:oregon.obce@state.or.us)

[www.oregon.gov/OBCE](http://www.oregon.gov/OBCE)

February 21, 2008

Gregory Pouls DC  
United Medical Network, Inc.  
1197 West Newport Center Dr.  
Deerfield Beach, Florida 33442

Re: Oregon prohibition on fee-splitting (CEASE & DESIST LETTER)

Dear Dr. Pouls,

We have received a reliable report that your company is contacting Oregon chiropractic physicians with a promotion to utilize your services. I also discussed this with Sherman Hun, who we understand is a local distributor for your company.

We understand you are requesting Oregon DCs to recruit patients to your program, then the chiropractor sends your testing kits home with the patients who then send their UA & samples directly to your company in Florida. You then formulate a customized supplement for the patient. You (UMN) charge the patient for the testing and the supplements. In exchange, the chiropractor receives a 40% commission. Your website's Partner Program appears to bear out this understanding.

If our understanding of this program is correct, then this arrangement is a clear violation of Oregon Administrative Rule 811-035-0015:

*Unprofessional conduct shall include, but not be limited to, the following acts of a Chiropractic physician:*

*(24) Splitting fees or giving or receiving a commission in the referral of patients for services.*

Any Oregon chiropractic physician who participates in this fee splitting arrangement is potentially subject to disciplinary action and possible civil penalties. You are requested to CEASE & DESIST in from any promotion of a fee-splitting program for referral of patients from Oregon DCs.

Sincerely,

Dave McTeague  
Executive Director

