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Client Assistance Office  
Oregon State Bar  
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Dear Oregon State Bar,

My name is Naina Sachdev, M.D. I am registering complaints against three individuals associated with the Oregon Medical Board (OMB). All three are J.D.s; Assistant Attorney General **Warren Foote**, Executive Director **Kathleen Haley**, and **Nicole Krishnaswami**. All three collaborated criminally to destroy my career. This has caused me insufferable psychological distress and turmoil, economic hardship and family upheaval. All three have disregarded their duty to abide by the Oregon Rules of Professional Conduct; in particular Rules 8.3 (a)(b) and Rules 8.4 (a)(1)(2)(3)(4)(5)(6).

These three individuals colluded to formulate a deceitful plan to destroy my medical career. This plan was launched by Mr. Foote at my hearing. (see **Exhibit** **A** – Report to National Practitioner Data Bank (NPDB) by my lawyer Kevin Mirch).

As noted by Mr. Mirch in his letter:

1. Prior to, and during my hearing, there were severe violations of my due process rights.
2. Finding of facts were omitted, erroneous, and unsupported by the preponderance of the evidence in the record by the OMB Final Order.
3. Necessary legal conclusions were omitted and were contrary to the law and the OMB’s rules and written policies.
4. Prejudicial procedural errors occurred before and during my hearing.
5. The OMB Final Order violated my constitutional right to due process.
6. Warren Foote, Kathleen Haley and Nicole Krishnaswami introduced two physicians as “expert” witnesses at my hearing that had no knowledge or experience in Integrative Medicine. They both admitted this under oath. Both physicians were trained only in Internal Medicine. One of these physicians was Dr. Joseph Thaler who is the Medical Director for the OMB. **This is a grave conflict of interest**. The other physician was Pamela Turner, M.D.
7. Two physicians testified on my behalf. One was James William Forsythe, M.D., H.M.D. He is a medical and homeopathic Physician. He is a pathologist, but is also certified in Internal Medicine, Oncology, and Homeopathy. Since 1996, he has been practicing Integrative Medicine, specifically Integrative Oncology.

The other physician was Stephen Holt, M.D. who has practiced medicine for 40 years. He is Board Certified in Internal Medicine, Gastroenterology, and Clinical Nutrition. He is the author of approximately 30 books, primarily regarding Integrative Medicine. Dr. Holt is world renowned.

Both these physicians had no negative criticisms of my practice, only positives. None of this was noted in my Final Order from the OMB. The writing of all Final Orders is orchestrated by Foote, Haley and Krishnaswami. This Final Order is then fed to the physician and public board members who rubber stamp it.

1. Warren Foote, Kathleen Haley and Nicole Krishnaswami instead chose to use testimony from Dr. Thaler and Dr. Turner in their Final Order to revoke my license, both of whom admitted they had no experience in Integrative Medicine.
2. ALJ Jennifer H. Rackstraw, who “oversaw” my hearing, conjured up violations against me in her Proposed Order that even the OMB had not made, but included in their Final Order.
3. **By far the most egregious incident that occurred surrounding my hearing was Foote’s, Haley’s and Krishnaswami’s witness tampering and intimidation.** (see **Exhibit B** – Dr. Ken Welker’s Affidavit). These three threatened Ken Welker, M.D., in particular Mr. Warren Foote, with license revocation if he testified at my hearing. Whatever Mr. Foote is involved with is planned, known and instigated by Haley and Krishnawami in addition. Dr. Welker did not testify at my hearing because of these threats and intimidation. Mr. Foote, Ms. Haley and Ms. Krishnaswami work together on all cases. Each is aware of the strategy being used to take down and revoke a physician. Again, this is a full frontal psychological and economic assault that the three of them formulate together.

I don’t use the word criminal lightly, but there is no other way to describe what has happened to me and others at the hands of the OMB.

I am happy to supply you with any documentation you request. Please feel free to contact me.

Sincerely,

Naina Sachdev

November 10, 2015