



**KLEIMAN / RAJARAM**  
12121 Wilshire Blvd., Ste. 810  
Los Angeles, CA 90025  
Tel: (310) 392-5455  
Fax: (310) 306-8491

Mark Kleiman  
[mark@krlaw.us](mailto:mark@krlaw.us)

Pooja Rajaram  
[pooja@krlaw.us](mailto:pooja@krlaw.us)

## QUI TAM QUESTIONNAIRE

If you would like me to evaluate your potential case and consider representing you in a False Claims Act lawsuit, please:

- Carefully read this section.
- Fill out the following questionnaire and email it back. (Please use a separate sheet if necessary.)
- Please provide as much detail as possible and send us any supporting documentation. If you would rather write a narrative, please address all the issues the questionnaire raises. The statute of limitations for filing a False Claims Act lawsuit can be as short as six years and the opportunity for a private individual to bring a false claims action may be cut off if someone else publicizes the conduct at issue, files a False Claims Act lawsuit making similar charges or otherwise spurs the government into action before you file suit. If you know of any impending events that might pre-empt your claim, tell us immediately.

Also, if you have been fired, please tell us immediately, because you may have a much shorter period of time in which to file an employment suit.

By law, your communications with us during the evaluation process are regarded as privileged and confidential and will be treated by us accordingly.

1. Name:

2. Address:

Mobile:

Business: (if it's ok to call you there)

4. Best Times to Call:
5. Fax:
6. Email:
7. Job Title:
8. Employer:
9. Company or Companies Involved in the fraud :
10. The City and State Where Each of these Companies is Headquartered:

The False Claims Act generally allows whistleblowers to bring qui tam lawsuits when the government has made payments based on false claims, paid claims based on false certifications or has not been paid money owed to it. The law does not apply every time the government makes an unwise purchasing or management decision. It also does not apply to cases of mistake or negligence.

With this in mind, describe how you believe that the company has violated the False Claims Act. Please include the following information:

11. What actions or activities do you believe were fraudulent?

12. List the name, job title, and role, of all people engaged in the fraud.
  
13. How did you learn of the fraud?
  
14. When did the fraud begin?' When did it end?
  
15. If you were involved at all in the fraud, please describe how, and when?
  
16. What documents exist that would help prove the case? Do you have any of those documents?
  
17. Please list all witnesses who could support your charges in the tabular format below:

Last Name, First Name	Contact Info	Position in Company	Areas of Knowledge	Present Employee or Former	Likely to Divulge Inquiry to Deft?

18. If you have discussed your allegations with anyone, including your employer, a local, state or federal government official or someone in the media? If so, please state with whom you discussed the matter, the circumstances and any response.
  
19. If you discussed your allegations and concerns with your employer, was there any change in your employer's practices after the conversation?
  
20. Did anyone working for your employer threaten to retaliate against you, or was there any retaliation? If so, please describe.
  
21. If you lost your job, have you filed or are you considering filing a wrongful termination lawsuit? Please describe any action you have taken in this regard.
  
22. Have your allegations been the subject of any legal or legislative action? For example, have they been disclosed in the course of a wrongful termination action, a products liability case, a congressional hearing or agency proceeding? If so, please describe.
  
23. Have the allegations you are making been discussed – at all – in the media? If so, please describe and attach articles or links.
  
24. Did your company have a compliance program, a hotline, or training in how to avoid fraud, or what to do if you came across it? Please tell us about the program. Why do you think the fraud occurred in spite of it?

25. How much, in dollar terms, would you estimate the government has been damaged by the alleged wrongdoing? (In your calculations, exclude any penalties.) Describe how you arrived at your estimated damages.
26. Have you ever been involved in a lawsuit against anyone or any company before? If yes, what was the case about?

By providing you these materials and by reviewing the information you send, I have not agreed to represent you nor have you agreed to retain me.

A False Claims Act lawsuit can, and usually does, take a number of years from start to finish. When I accept a case, I make a major commitment in terms of consultants, researchers, money and other resources to bring it to a successful conclusion. Because of that commitment, I thoroughly analyze potential cases before I accept them. It may take some time to review your case. There are several reasons: First, the review of your charges may include an investigation of the facts presented and sometimes consultations with experts in the field. At the same time, I have to continue to work on my existing cases and conduct reviews of other potential lawsuits. If you have any questions, please feel free to contact me at any time about the status of our review of your potential case. If these time constraints do not fit your needs, you may wish to discuss your potential case with other lawyers. Other law firms may approach the investigation of a potential False Claims Act case differently, such as filing a lawsuit at an earlier date with less substantiation than I require, or may have more time and resources instantly available to investigate a potential case.

As you search for counsel, bear in mind that the statute of limitations can be as short as six years. In addition, any public disclosure of the fraudulent conduct, the filing of another False Claims Act lawsuit making the same charges or government action on the matter before your lawsuit is filed might be grounds for dismissal of a case. This could happen while I am reviewing your case, before I decide that I am going to be able to represent you and file a lawsuit on your behalf.

If you would like me to review your potential case and you have filled out the above questionnaire, please acknowledge that you have read the above considerations and agree to them by entering your name and the date below:

Thank you,  
  
Mark Allen Kleiman

DATE: \_\_\_\_\_

NAME: \_\_\_\_\_