

SUPERIOR COURT OF THE STATE OF CALIFORNIA
CENTRAL JUSTICE CENTER, COUNTY OF ORANGE

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

CASE NO.

INDICTMENT

RYAN NATHANIL MCCRACKEN 12/18/74

JEFFREY EDWARD CAMPAU 10/15/74

LANDEN ALAN MIRALLEGRO 09/19/75

ABRAHAM KHORSHAD 08/26/51

DBA:

Abrexis Orthocare: EIN: 45-4870620

Aspen Medical Resources: EIN: 59-3812903

National DME EIN: 61-1492114

Atlas Collections LLC

Defendant(s)

THE ORANGE COUNTY GRAND JURY accuses the above-named **RYAN NATHANIL MCCRACKEN, JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, of violating the law in Orange County, California, as follows:

COUNT 1:

On or about June 8, 2005 to October 21, 2013, in violation of Section 182(a)(1) of the Penal Code (CONSPIRACY TO COMMIT A CRIME), a FELONY, **RYAN NATHANIL MCCRACKEN, JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, did unlawfully conspire together and with each other to commit the crime of CONSPIRACY TO COMMIT INSURANCE FRAUD, in violation of Section 550, of the Penal Code. It is further alleged that pursuant to and for the purpose of carrying out the objects and purposes of the conspiracy, one and more of the conspirators committed the following overt acts:

OVERT ACTS:

- I. Jeffrey Campau, Landen Mirallegro and Abraham Khorshad formed a Durable Medical Equipment company named ASPEN MEDICAL RESOURCES, LLC in June of 2005 to provide almost exclusively durable medical equipment to workers compensation patients.
- II. Jeffrey Campau and Landen Mirallegro owned 25% of the company and Abraham Khorshad owned the other 50%.
- III. Jeffrey Campau, Landen Mirallegro and Abraham Khorshad, employed sales persons to solicit doctors' offices for prescriptions for a hot/cold unit to workers compensation patients and paid the sales persons commissions for each prescription.
- IV. Campau and Mirallegro instructed their sales staff to obtain prescriptions written by doctors and chiropractors without specifying a length of use for the hot/cold unit.
- V. The sales persons employed by Aspen Medical Resources, at the direction of Campau and Mirallegro sought multiple prescriptions extensions from the doctor's offices to justify rental of the hot/cold unit for multiple months.
- VI. Campau and Mirallegro instructed the billing staff to submit claims to the insurance carrier in a deceptive format making it appear as if two units were provided to the patients instead of only one unit.
- VII. Campau and Mirallegro also instructed the billing staff to bill the hot/cold unit to the insurance carriers at rental rates which were well in excess of the hot/cold units Manufacturer's Suggested Retail Price without giving the insurance carrier the option to purchase the unit instead of renting it.
- VIII. Campau, Mirallegro and Khorshad submitted claims to insurance carriers in the same manner as ASPEN under an additional company owned by Jeff Campau and Landen Mirallegro named National DME without disclosing to the insurance carriers that National DME and ASPEN MEDICAL RESOURCES LLC were in fact the same company.
- IX. Campau, Mirallegro and Khorshad directed their staff to file liens at the Workers Compensation Appeals Board for any unpaid balances for these claims.
- X. Ryan McCracken was employed as the collection manager by Campau, Mirallegro and Khorshad to aggressively collect on these liens between 2009 to October 21, 2013.
- XI. McCracken received commissions for recovery on liens from ASPEN and National DME until April of 2012.

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2 XII. McCracken appeared in depositions for Campau, Mirallegro and Khorshad on January 16, 2012 as the
3 person most knowledgeable on ASPEN's billing practices.

4 **COUNT 2:**

5 On or about November 3, 2009 to April 24, 2012, in violation of Section, 550(a)(8) of the Penal
6 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
7 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
8 THE COUNTY OF SAN BERNARDINO, did knowingly and unlawfully present multiple claims for
9 payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950),
and did aid and abet, solicit, and conspire with another to do the same.

10 **COUNT 3:**

11 On or about November 3, 2009 to April 24, 2012, in violation of Section 550(a)(5) of the
12 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
13 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
14 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
15 writing, with the intent to present and use it, and to allow it to be presented to
16 THE COUNTY OF SAN BERNARDINO in support of a false and fraudulent claim, and did aid
and abet, solicit, and conspire with another to do the same.

17 **COUNT 4:**

18 On or about December 23, 2009 to January 6, 2012, in violation of Section, 550(a)(8) of the Penal
19 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
20 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
FIREMAN'S FUND, did knowingly and unlawfully present multiple claims for payment of the same
health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet,
solicit, and conspire with another to do the same.

21 **COUNT 5:**

22 On or about December 23, 2009 to January 6, 2012, in violation of Section 550(a)(5) of the
23 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
24 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
25 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
26 writing, with the intent to present and use it, and to allow it to be presented to
27 FIREMAN'S FUND, in support of a false and fraudulent claim, and did aid
28 and abet, solicit, and conspire with another to do the same.

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2 **COUNT 6:**

3 On or about November 16, 2009 to July 31, 2012, in violation of Section, 550(a)(8) of the Penal
4 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
5 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
6 REPUBLIC INDEMNITY, did knowingly and unlawfully present multiple claims for payment of the
same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and
abet, solicit, and conspire with another to do the same.

7 **COUNT 7:**

8 On or about November 16, 2009 to July 31, 2012, in violation of Section 550(a)(5) of the
9 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
10 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
11 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
12 writing, with the intent to present and use it, and to allow it to be presented to
REPUBLIC INDEMNITY, in support of a false and fraudulent claim, and did aid
and abet, solicit, and conspire with another to do the same.

13 **COUNT 8:**

14 On or about November 16, 2009 to April 5, 2013, in violation of Section, 550(a)(8) of the Penal
15 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
16 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
17 AMERICAN CLAIMS MANAGEMENT, did knowingly and unlawfully present multiple claims for
payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950),
and did aid and abet, solicit, and conspire with another to do the same.

18 **COUNT 9:**

19 On or about November 16, 2009 to April 5, 2013, in violation of Section 550(a)(5) of the
20 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
21 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
22 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
23 writing, with the intent to present and use it, and to allow it to be presented to
AMERICAN CLAIMS MANAGEMENT, in support of a false and fraudulent claim, and did aid
and abet, solicit, and conspire with another to do the same.
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2 **COUNT 10:**

3 On or about December 13, 2010 to July 6, 2012, in violation of Section, 550(a)(8) of the Penal Code
4 (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN**
5 **ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud TRISTAR
6 AND CENTRE INSURANCE, did knowingly and unlawfully present multiple claims for payment of
the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid
and abet, solicit, and conspire with another to do the same.

7 **COUNT 11:**

8 On or about October 13, 2010 to July 6, 2012, in violation of Section 550(a)(5) of the
9 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
10 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**,
11 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
12 writing, with the intent to present and use it, and to allow it to be presented to
TRISTAR AND CENTRE INSURANCE, in support of a false and fraudulent claim, and did aid
and abet, solicit, and conspire with another to do the same.

13 **COUNT 12:**

14 On or about November 3, 2009 to July 17, 2011, in violation of Section, 550(a)(8) of the Penal Code
15 (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN**
16 **ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud CNA, did
17 knowingly and unlawfully present multiple claims for payment of the same health care benefit in an
amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with
another to do the same.

18 **COUNT 13:**

19 On or about November 3, 2009 to July 17, 2011, in violation of Section 550(a)(5) of the
20 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
21 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**,
22 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
writing, with the intent to present and use it, and to allow it to be presented to
23 CNA, in support of a false and fraudulent claim, and did aid
and abet, solicit, and conspire with another to do the same.
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2 **COUNT 14:**

3 On or about March 8, 2011 to January 30, 2012, in violation of Section, 550(a)(8) of the Penal Code
4 (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN**
5 **ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud HUDSON, did
6 knowingly and unlawfully present multiple claims for payment of the same health care benefit in an
amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with
another to do the same.

7 **COUNT 15:**

8 On or about March 8, 2011 to January 30, 2012, in violation of Section 550(a)(5) of the
9 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
10 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
11 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
12 writing, with the intent to present and use it, and to allow it to be presented to
HUDSON, in support of a false and fraudulent claim, and did aid
and abet, solicit, and conspire with another to do the same.

13 **COUNT 16:**

14 On or about November 3, 2009 to October 24, 2012, in violation of Section, 550(a)(8) of the Penal
15 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
16 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud
17 STATE FARM, did knowingly and unlawfully present multiple claims for payment of the same
health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet,
solicit, and conspire with another to do the same.

18 **COUNT 17:**

19 On or about November 3, 2009 to October 24, 2012, in violation of Section 550(a)(5) of the
20 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
21 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
22 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
23 writing, with the intent to present and use it, and to allow it to be presented to
STATE FARM, in support of a false and fraudulent claim, and did aid
and abet, solicit, and conspire with another to do the same.

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COUNT 18:

On or about November 2, 2009 to August 23, 2012, in violation of Section, 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud SPARTA AND YORK, did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with another to do the same.

COUNT 19:

On or about November 2, 2009 to August 23, 2012, in violation of Section 550(a)(5) of the Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD, CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SPARTA AND YORK, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 20:

On or about December 15, 2009 to January 11, 2012, in violation of Section, 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud GALLEGHER BASSETT (ACE, AIGRM, OLD REPUBLIC PENNSYLVANIA), did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with another to do the same.

COUNT 21:

On or about December 15, 2009 to January 11, 2012, in violation of Section 550(a)(5) of the Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD, CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to GALLEGHER BASSETT (ACE, AIGRM, OLD REPUBLIC PENNSYLVANIA), in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

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2 **COUNT 22:**

3 On or about November 23, 2009 to September 04, 2012, in violation of Section, 550(a)(8) of the
4 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
5 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud
6 LIBERTY MUTUAL, did knowingly and unlawfully present multiple claims for payment of the
same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and
abet, solicit, and conspire with another to do the same.

7 **COUNT 23:**

8 On or about November 23, 2009 to September 4, 2012, in violation of Section 550(a)(5) of the
9 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
10 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**,
11 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
12 writing, with the intent to present and use it, and to allow it to be presented to LIBERTY MUTUAL
in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to
do the same.

13 **COUNT 24:**

14 On or about December 24, 2009 to April 25, 2013, in violation of Section, 550(a)(8) of the Penal
15 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
16 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud
17 THE COUNTY OF RIVERSIDE, did knowingly and unlawfully present multiple claims for payment
of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid
and abet, solicit, and conspire with another to do the same.

18 **COUNT 25:**

19 On or about December 24, 2009 to April 25, 2013, in violation of Section 550(a)(5) of the
20 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
21 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**,
22 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
23 writing, with the intent to present and use it, and to allow it to be presented to THE COUNTY OF
RIVERSIDE, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

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2 **COUNT 26:**

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4 On or about November 2, 2009 to September 11, 2012, in violation of Section, 550(a)(8) of the Penal
5 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
6 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
7 EMPLOYERS, did knowingly and unlawfully present multiple claims for payment of the same
8 health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet,
9 solicit, and conspire with another to do the same.

10 **COUNT 27:**

11 On or about November 2, 2009 to September 11, 2012, in violation of Section 550(a)(5) of the
12 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
13 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
14 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
15 writing, with the intent to present and use it, and to allow it to be presented to EMPLOYERS,
16 in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
17 with another to do the same.

18 **COUNT 28:**

19 On or about November 23, 2009 to May 23, 2012, in violation of Section, 550(a)(8) of the Penal
20 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
21 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
22 FARMERS, did knowingly and unlawfully present multiple claims for payment of the same health
23 care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit,
24 and conspire with another to do the same.

25 **COUNT 29:**

26 On or about November 23, 2009 to May 23, 2012, in violation of Section 550(a)(5) of the
27 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
28 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
writing, with the intent to present and use it, and to allow it to be presented to FARMERS,
in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

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2 **COUNT 30:**

3 On or about November 17, 2009 to May 11, 2011, in violation of Section, 550(a)(8) of the Penal
4 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
5 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
6 TRAVELERS, did knowingly and unlawfully present multiple claims for payment of the same health
care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit,
and conspire with another to do the same.

7 **COUNT 31:**

8 On or about November 17, 2009 to May 11, 2011, in violation of Section 550(a)(5) of the
9 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
10 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
11 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
12 writing, with the intent to present and use it, and to allow it to be presented to TRAVELERS,
in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

13 **COUNT 32:**

14 On or about July 2, 2012 to August 6, 2012, in violation of Section, 550(a)(8) of the Penal Code
15 (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN**
16 **ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud FIRST COMP
17 INSURANCE, did knowingly and unlawfully present multiple claims for payment of the same health
care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit,
and conspire with another to do the same.

18 **COUNT 33:**

19 On or about July 2, 2012 to August 6, 2012, in violation of Section 550(a)(5) of the
20 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
21 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
22 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
23 writing, with the intent to present and use it, and to allow it to be presented to FIRST COMP
INSURANCE, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

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COUNT 34:

On or about November 24, 2009 to June 20, 2012, in violation of Section, 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud STATE COMPENSATION INSURANCE FUND, did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with another to do the same.

COUNT 35:

On or about November 24, 2009 to June 20, 2012, in violation of Section 550(a)(5) of the Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD, CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to STATE COMPENSATION INSURANCE FUND, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 36:

On or about December 29, 2009 to June 13, 2012, in violation of Section, 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud COMP WEST, did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with another to do the same.

COUNT 37:

On or about December 29, 2009 to June 13, 2012, in violation of Section 550(a)(5) of the Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD, CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to COMP WEST, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 38:

On or about November 2, 2009 to May 3, 2012, in violation of Section, 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud SENTRY, did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with another to do the same.

COUNT 39:

On or about November 2, 2009 to May 3, 2012, in violation of Section 550(a)(5) of the Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD, CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SENTRY, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 40:

On or about November 17, 2009 to November 23, 2010, in violation of Section, 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud BERKSHIRE HATHAWAY (BHHC), did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with another to do the same.

COUNT 41:

On or about November 17, 2009 to November 23, 2010 in violation of Section 550(a)(5) of the Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD, CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to BERKSHIRE HATHAWAY (BHHC), in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

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2 **COUNT 42:**

3 On or about November 09, 2009 to October 18, 2012, in violation of Section, 550(a)(8) of the Penal
4 Code (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU,**
5 **LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud
6 CHARTIS (AIG), did knowingly and unlawfully present multiple claims for payment of the same
health care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet,
solicit, and conspire with another to do the same.

7 **COUNT 43:**

8 On or about November 09, 2009 to October 18, 2012, in violation of Section 550(a)(5) of the
9 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
10 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
11 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
12 writing, with the intent to present and use it, and to allow it to be presented to CHARTIS (AIG),
in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

13 **COUNT 44:**

14 On or about November 1, 2009 to July 2, 2012, in violation of Section, 550(a)(8) of the Penal Code
15 (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN**
16 **ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,** with the intent to defraud HARTFORD
17 INSURANCE, did knowingly and unlawfully present multiple claims for payment of the same health
care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit,
and conspire with another to do the same.

18 **COUNT 45:**

19 On or about November 1, 2009 to July 2, 2012, in violation of Section 550(a)(5) of the
20 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
21 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD,**
22 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
23 writing, with the intent to present and use it, and to allow it to be presented to HARTFORD
INSURANCE in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

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2 **COUNT 46:**

3 On or about November 2, 2009 to July 19, 2013, in violation of Section, 550(a)(8) of the Penal Code
4 (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN**
5 **ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud ZENITH
6 INSURANCE, did knowingly and unlawfully present multiple claims for payment of the same health
care benefit in an amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit,
and conspire with another to do the same.

7 **COUNT 47:**

8 On or about November 2, 2009 to July 19, 2013, in violation of Section 550(a)(5) of the
9 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
10 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**,
11 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
12 writing, with the intent to present and use it, and to allow it to be presented to ZENITH
INSURANCE in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

13 **COUNT 48:**

14 On or about March 18, 2010 to August 25, 2011, in violation of Section, 550(a)(8) of the Penal Code
15 (MEDICAL INSURANCE FRAUD), a FELONY, **JEFFREY EDWARD CAMPAU, LANDEN**
16 **ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**, with the intent to defraud USPS, did
17 knowingly and unlawfully present multiple claims for payment of the same health care benefit in an
amount exceeding nine hundred fifty dollars (\$950), and did aid and abet, solicit, and conspire with
another to do the same.

18 **COUNT 49:**

19 On or about March 18, 2010 to August 25, 2011, in violation of Section 550(a)(5) of the
20 Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, **JEFFREY EDWARD,**
21 **CAMPAU, LANDEN ALAN MIRALLEGRO** and **ABRAHAM KHORSHAD**,
22 with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material
23 writing, with the intent to present and use it, and to allow it to be presented to USPS,
in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

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3 Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense
4 counsel provide discovery to the People as required by Penal Code Section 1054.3.

5 DATED:

6 A TRUE BILL

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8 **DAVID BAKER, Foreman, Grand Jury**
9 County of Orange, State of California
For the year 2013 - 2014

10
11 BY:

12 **SHADDI KAMIABIPOUR**
13 Deputy District Attorney

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15 **---WITNESSES EXAMINED BEFORE THE GRAND JURY---**

- 16 1. Angelina Beltran, Fullerton
17 2. Jani Meneses, Anaheim
18 3. Lisa Marie Nusbaum, Whittier
19 4. Sonia Robles, Santa Ana
20 5. Jason Rudderow, San Bernardino
21 6. Robert Aniceto Vargas, La Habra
22 7. Rigo Hernandez, La Mirada
23 8. Michael Darrin Padilla, Westminster
24 9. Jonanthan Robert Pena, Hacienda Heights
25 10. Horalia Ramirez, La Mirada
26 11. Monica Chavez, Santa Ana
27 12. Linda Pasillas, Baldwin Park
28 13. Kenneth Tripp, Corona Del Mar
14. Dameon Patrick Butler, Riverside
15. Agnes Grogan, Expert
16. Teia Hastings-Rowe, Expert, Noridian Healthcare Solutions, Fargo
17. Jasraj Chawla, San Francisco

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- 2 18. Danielle R. Meisenbach, San Francisco
- 3 19. Renee Francis Sorian, Covina
- 4 20. Fidel Borrego, Republic Indemnity Insurance
- 5 21. Jennifer Conner, American Claims Management
- 6 22. Tracy Crates, CNA Insurance
- 7 23. Mary Gillette, State Farm Insurance
- 8 24. Sandy Gonzales, Sparta and York Insurance
- 9 25. Anthony Hurtado, Liberty Mutual
- 10 26. Christina Hurtado, County of San Bernardino
- 11 27. Dennis Knotts, County of Riverside, Expert
- 12 28. Maria Kramer, Employers
- 13 29. Anne Luce, Farmers Insurance
- 14 30. Steven McCoy, Travelers Insurance
- 15 31. Danelle McPeak, First Comp Insurance
- 16 32. Colleen Maher, USPS
- 17 33. Lane Spencer, State Compensation Insurance Fund
- 18 34. Tony Torres, Comp West
- 19 35. Todd Watson, Berkshire Hathaway (BHHC)
- 20 36. Linda White, Chartis (AIG)
- 21 37. John Williams, Tristar
- 22 38. Dulce Marroquin, Custodian of Records, Bank of America
- 23 39. Oliver Glover, Zenith
- 24 40. Aaron Turchin, Attorney
- 25 41. Gail Roberts, Custodian of Records, Grandpoint Bank (FKA: First Commerce Bank)
- 26 42. Ivan Lozada, Custodian of Records, JP Morgan Chase Bank (FKA: Washington Mutual Bank)
- 27 43. Edward Salgado, Custodian of Records, US Bank
- 28 44. Martha Martinez, Custodian of Records, Wells Fargo Bank (FKA: Wachovia Bank)
45. Tristina Blokdyk
46. Arnold C. Quon
47. Inv. Brian Penfold, OCDA
48. Inv. Louie Martinez, OCDA
49. Michelle Duncan, OCDA
50. Gary Sheinberg, OCDA

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2 Presented by the Foreman of the Grand Jury of the County of Orange, State of California, for the
3 year 2013 – 2014, in the presence of the Grand Jury, to the Superior Court of the State of California,
4 in and for the County of Orange, and filed as a record of this court this _____ day of October,
5 2013.

6 ALAN CARLSON, EXECUTIVE OFFICER
7 and Clerk of the Superior Court
8 of the State of California, in and
9 for the County of Orange

10
11 BY: _____
12 DEPUTY CLERK

13
14 TONY RACKAUCKAS, DISTRICT ATTORNEY
15 of the County of Orange, State of California

16
17 BY: _____
18 **SHADDI KAMIABIPOUR**
19 Deputy District Attorney