

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

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

Kareem Ahmed

11/09/68

Michael Rudolph

02/22/50

Andrew Jarminski, M.D.

10/23/62

Defendant(s)

CASE NO. 14ZF0335

INDICTMENT

THE ORANGE COUNTY GRAND JURY accuses the above-named KAREEM AHMED, MICHAEL RUDOLPH and ANDREW JARMINSKI, of violating the law in Orange County, California, as follows:

COUNT 1:

On or about October 1, 2009 to January 31, 2013, in violation of Section 182(a)(1) of the Penal Code (CONSPIRACY TO COMMIT A CRIME), a FELONY, KAREEM AHMED, MICHAEL RUDOLPH and ANDREW JARMINSKI did unlawfully conspire together and with each other to commit the crime of FILE FALSE MEDICAL CLAIM EXCEEDING \$950 in violation of Section 550 (a)(6) 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

1. In 2009, Kareem Ahmed, Evette Charbonnet, Bruce Curnick and Mike Shah (a pharmacist), met.
2. In 2009, Kareem Ahmed, Evette Charbonnet, Bruce Curnick and Mike Shah (a pharmacist), formulated three compound transdermal cream formulas based on the profitability of the ingredients.

3. Kareem Ahmed directed his employees to identify and recruit physicians who treated workers' compensation patients to dispense and prescribe these compounded transdermal creams.
4. Under the guise of purchasing the physician's Accounts Receivables, Kareem Ahmed gave financial incentives to the physicians to dispense and prescribe these compounded transdermal creams to their workers' compensation patients.
5. Michael Rudolph, a pharmacist, agreed to manufacture Kareem Ahmed's formulas for physicians who treated workers' compensation patients.
6. Kareem Ahmed entered into an agreement with Michael Rudolph, a pharmacist, and owner of Tustin Community Pharmacy Inc., DBA Healthcare Pharmacy, on November 30, 2010.
7. Between June 15, 2010, and December 31, 2012, Kareem Ahmed paid physicians over 25 million dollars to dispense transdermal compounded creams which were manufactured by pharmacists he had contracts with.
8. Kareem Ahmed gave this financial "kickback" scheme the appearance of legitimacy by requiring the physicians and the pharmacists to sign a contract for purchase of future accounts receivables.
9. Kareem Ahmed managed the financial "kickback" program and discouraged the physicians and the pharmacists from having direct contact with each other.
10. Kareem Ahmed purchased the accounts receivable from physicians contingent upon the physician prescribing the "remaining month supply" to the patient from a pharmacy that had a contract with Kareem Ahmed.
11. Between June 15, 2010 to December 31, 2013, Kareem Ahmed's companies that purchased accounts receivables from the physicians posted a net loss of approximately \$1.8 million dollars.
12. Between June 15, 2010 to December 31, 2013, Kareem Ahmed's companies that purchased accounts receivables from pharmacies posted a net profit of over \$25 million dollars.
13. Between 2010 and 2013, Kareem Ahmed paid Andrew Jarminski, M.D., in excess of one million and nine hundred thousand dollars (\$1,900,000).
14. Between 2010 and 2013, Kareem Ahmed paid Michael Rudolph and Healthcare Pharmacy in excess of one million dollars (\$1,000,000).

1
2
3 COUNT 2:

4 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 650 of the
5 Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY,
6 ANDREW JARMINSKI, M.D., a person licensed under the Healing Arts Division of this Code
7 and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate,
8 refund, commission, preference, patronage dividend, discount, and other consideration as
9 compensation and inducement for referring patients, clients, and customers to Curt's
10 Compounding Pharmacy in Fountain Valley, California and Tustin Community Pharmacy Inc.
11 DBA Healthcare Pharmacy

12
13
14 COUNT 3:

15 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
16 of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
17 ANDREW JARMINSKI, M.D. and KAREEM AHMED, with the intent to defraud, did
18 knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to
19 present and use it, and to allow it to be presented to Aims, Employers Ins., Harfort Ins.,
20 Gallagher Bassett, Zurich Ins., American Claims Management, Liberty Mutual Ins.,
21 Sedgwick, Traverlers Ins., Sedgwick, C.N.A. Ins., Fireman's Fund Ins., Tristar,
22 Berkshire Hathaway Homestate Companies, State Compensation Insurance Fund, Republic
23 Indemnity Ins., Sentry Ins., AIG/Chartis, York, Crum & Forster, Farmers Ins.,
24 First Comp Ins., ICW, Zenith Ins., Seabright Ins., State Farm, Employers Ins. in support of a
25 false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the
26 same.

27
28 COUNT 4:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
ANDREW JARMINSKI, M.D. and KAREEM AHMED 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 City Of Los Angeles, County Of Riverside,
Vons, County Of San Bernardino, Kaiser, City Of Gardena, City Of Santa Monica, City Of
Long Beach, City Of Pasadena, City Of Torrance, County Of Riverside, City Of Riverside,
City Of Huntington Beach, County Of Los Angeles, Nordstrom, City Of Gardena, and
City Of Santa Monica in support of a false and fraudulent claim, and did aid and abet, solicit,
and conspire with another to do the same.

1 COUNT 5:

2 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of the
3 Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, ANDREW JARMINSKI,
4 M.D., did unlawfully solicit, accept, and refer business to and from Med-Rx, LLC and Healthcare
5 Finance Management, LLC with the knowledge that, and with reckless disregard for whether
6 Med-Rx, LLC and Healthcare Finance Management, LLC intended to violate Penal Code section
7 550 and Insurance Code section 1871.4.

8 COUNT 6:

9 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of the
10 Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, MICHAEL RUDOLPH, did
11 unlawfully solicit, accept, and refer business to and from PharmaFinance, LLC with the
12 knowledge that, and with reckless disregard for whether PharmaFinance, LLC intended to violate
13 Penal Code section 550 and Insurance Code section 1871.4.

14 COUNT 7:

15 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
16 of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
17 MICHAEL RUDOLPH and KAREEM AHMED, with the intent to defraud, did knowingly and
18 unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it,
19 and to allow it to be presented to Aims, Employers Ins., Harfort Ins., Srs, Gallagher Bassett,
20 Zurich Ins., American Claims Management, Liberty Mutual Ins., Sedgwick, Traverlars Ins.,
21 Sedgwick, C.N.A. Ins., Fireman's Fund Ins., Tristar, Berkshire Hathaway Homestate
22 Companies, State Compensation Insurance Fund, Republic Indemnity Ins., Sentry Ins.,
23 AIG/Chartis, York, Crum & Forster, Farmers Ins., First Comp Ins., ICW, Zenith Ins., Seabright
24 Ins., State Farm, Employers Ins. in support of a false and fraudulent claim, and did aid and abet,
25 solicit, and conspire with another to do the same.

26 COUNT 8:

27 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
28 of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
MICHAEL RUDOLPH and KAREEM AHMED 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 City Of Los Angeles, County Of Riverside, Vons, County Of
San Bernardino, Kaiser, City Of Gardena, City Of Santa Monica, City Of Long Beach, City Of
Pasadena, City Of Torrance, County Of Riverside, City Of Riverside, City Of Huntington Beach,
County Of Los Angeles, Nordstrom, City Of Gardena, and City Of Santa Monica in support of a
false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the
same.

1 COUNT 9:

2 On or about February 3, 2012, in violation of Section 192(b) of the Penal Code
3 (INVOLUNTARY MANSLAUGHTER BY LAWFUL ACT IN UNLAWFUL MANNER), a
4 FELONY, Kareem Ahmed, Michael Rudolph and Andrew Jarminski, did unlawfully and without
5 malice kill Andrew G. (a minor), a human being, in the commission of a lawful act which might
6 produce death, in an unlawful manner and without due caution and circumspection.

6 ENHANCEMENT(S)


7 As to Count(s) 1, 3, 4, 7 and 8 it is further alleged pursuant to Penal Code section
8 186.11(a)(1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that
9 defendants KAREEM AHMED, MICHAEL RUDOLPH and ANDREW JARMINSKI, engaged
10 in a pattern of related fraudulent Felony conduct involving the taking of more than five hundred
11 thousand dollars (\$500,000).

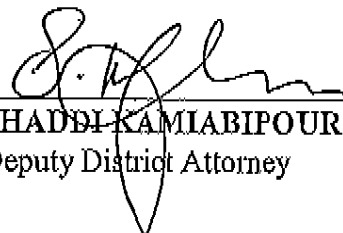
12 As to Count(s) 2, it is further alleged pursuant to Penal Code section 12022.6(a)(3) (PROPERTY
13 DAMAGE OVER \$1,300,000), that ANDREW JARMINSKI, intentionally took, damaged, and
14 destroyed property valued in excess of one million three hundred thousand dollars (\$1,300,000)
15 during the commission and attempted commission of the above offense.

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

18 DATED:

19 A TRUE BILL

20 
21 David Baker, Foreman , Grand Jury
22 County of Orange, State of California
23 For the year 2013 - 2014

24 BY: 
25 SHADDI KAMIABIPOUR
26 Deputy District Attorney
27
28

---WITNESSES EXAMINED BEFORE THE GRAND JURY---

1. Camarano, Paul
2. Carter, Danielle
3. Cohrt, Chelsey
4. Garner, Norma
5. Shah, Mayank "Mike" Parimal
6. Sanchez, Angela Noel
7. Chan, Samuel MD
8. Friedman, Amir MD
9. Rahman, Hamid MD
10. Salazar, Alejandra
11. Rangan, Cyrus, M.D. (Toxicologist Expert)
12. Ferrone, Marcus, Pharm D. (Expert Pharmacist)
13. Knotts, Dennis
14. O'Rourke, Terry
15. Komberg, Edward, DC
16. Mays, Jessica
17. Pena, Andrew
18. Mays, Archie, M.D.
19. Pratley, Brent, MD
20. Lintemoot, Jaime, LA Coroner
21. Pena, Louise, M.E.
22. Fu, E., LA Coroner
23. Anderson, Dan, LA Coroner
24. De Hesa, Calvin, LAPD
25. White, Jennifer
26. Hokana, Lin, (Board of Pharmacy)
27. Wong, Joseph, (Board of Pharmacy)
28. Yamada, Anna K. (Board of Pharmacy)
29. Adriance, Adrienne
30. Mirza, Saira F.
31. Gutierrez, Joseph, PA

- 1 32. Lujan, Priscilla
- 2 33. Marraccino, Alida, (ACIG)
- 3 34. Sullivan, Nicole, (ACM)
- 4 35. Dannoff, Nancy, (AN)
- 5 36. Oard, Gordon, (BHHC)
- 6 37. Camarco, Beth, (CLA)
- 7 38. Crates, Tracy, (CNA)
- 8 39. Hurtado, Christina, (County of SB)
- 9 40. Terrell, Don (C&F)
- 10 41. Kramer, Maria, (EMP)
- 11 42. Luce, Anne, (FMRS)
- 12 43. Auvinen, John, (FRMNS)
- 13 44. Dill, Christopher, (ICW)
- 14 45. Hurtado, Tony, (LM)
- 15 46. McPeak, Danelle, (MFC)
- 16 47. Daugherty, LuAnne, (PC)
- 17 48. Borrego, Fidel, (RI)
- 18 49. Spencer, Lane, (SCIF)
- 19 50. Ewing, Mike, (Sentry)
- 20 51. Lincoln, Frank, (TRVLRS)
- 21 52. Glover, Oliver, (ZEN)
- 22 53. Smith, Glen, (ZUR)
- 23 54. Whitley, Mark, (AI)
- 24 55. Torres, Tony, (CMPW)
- 25 56. Taras, Anthony (County of LA)
- 26 57. Saad, Talal (SDGWK)
- 27 58. Nielsen, Kristian, (AIG)
- 28 59. Riggs, John, (Disney)
60. Weitzman, Scott (OCDA)
61. Robbins, Christopher (OCDA)

62. Nichols, Fred (OCDA)
63. White, David (RCFL)
64. Duncan, Michele (OCDA)
65. Ascensio, Eddie (DOI)
66. Gross, Jeffrey, M.D.
67. Manguiat, Alex
68. Martinez, Sandra
69. Sambroski, Eugene
70. Lara, Cathy
71. Martinez, Louis

Presented by the Foreman of the Grand Jury of the County of Orange, State of California, for the year 2013 – 2014, in the presence of the Grand Jury, to the Superior Court of the State of California, in and for the County of Orange, and filed as a record of this court this 17th day of ~~May~~ June, 2014.

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

BY: Robin Hume

DEPUTY CLERK

R. HUME

TONY RACKAUCKAS, DISTRICT ATTORNEY
of the County of Orange, State of California

BY: Shaddi Kamlabipour

SHADDI KAMLABIPOUR

Deputy District Attorney

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

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

CASE NO. 14ZF0334

INDICTMENT

Evette Charbonnet 02/20/78

Bruce D. Curnick 08/03/54

Curtis William Hague 06/06/72

Eduardo Anguizola, M.D. 12/09/50

Daniel Alexander Capen, M.D. 10/07/49

Randy Rosen, M.D. 06/28/63

Michael Barri, D.C. 07/01/68

Rahil Khan, M.D. 04/03/68

Robert J. Villapania, D.C. 01/08/59

David K. Evans, D.C. 05/13/72

Arsalan Pourteymour, M.D. 10/12/47

Craig M. Chanin, M.D. 06/29/66

Defendant(s)

1 THE ORANGE COUNTY GRAND JURY accuses the above-named EVETTE
2 CHARBONNET, BRUCE D. CURNICK, CURTIS WILLIAM HAGUE, EDUARDO
3 ANGUIZOLA, DANIEL ALEXANDER CAPEN, RANDY ROSEN, , MICHAEL BARRI,
4 RAHIL KHAN, ROBERT J. VILLAPANIA, CRAIG M. CHANIN, ARSALAN
5 POURTEYMOUR, AND DAVID EVANS of violating the law in Orange County, California, as
6 follows:

7 COUNT 1:

8 On or about October 1, 2009 to January 31, 2013, in violation of Section 182(a)(1) of the Penal Code
9 (CONSPIRACY TO COMMIT A CRIME), a FELONY, EVETTE CHARBONNET, BRUCE D.
10 CURNICK, J.D. AND CURTIS WILLIAM HAGUE, EDUARDO ANGUIZOLA, DANIEL
11 ALEXANDER CAPEN, RANDY ROSEN, MICHAEL BARRI, RAHIL KHAN, ROBERT J.
12 VILLAPANIA, ARSALAN POURTEYMOUR AND DAVID EVANS did unlawfully conspire
13 together and with Kareem Ahmed to commit the crime of FILE FALSE MEDICAL CLAIM
14 EXCEEDING \$950 in violation of Section 550 (a)(6) of the Penal Code. It is further alleged that
15 pursuant to and for the purpose of carrying out the objects and purposes of the conspiracy, one and
16 more of the conspirators committed the following overt acts:

17 OVERT ACTS

- 18 1. Kareem Ahmed employed Defendant Evette Charbonnet as the Marketing Manager for
19 his company Landmark Medical Management LLC from April 2007 to Present.
- 20 2. Kareem Ahmed employed Defendant Bruce Curnick, J.D., as the Vice President for his
21 company Landmark Medical Management LLC from 2009 to July 30, 2012.
- 22 3. In 2009, Kareem Ahmed, Evette Charbonnet, Bruce Curnick and Mike Shah (a
23 pharmacist), formulated three compound transdermal cream formulas based on the
24 profitability of the ingredients.
- 25 4. Defendant Evette Charbonnet led a team of marketers to identify and recruit physicians
26 who treated workers compensation patients to dispense and prescribe these compounded
27 transdermal creams.
- 28 5. Under the guise of purchasing the physician's Accounts Receivables, Kareem Ahmed and
Defendant Charbonnet gave financial incentives to the physicians to dispense and
prescribe these compounded transdermal creams to their workers' compensation patients.
6. Defendant Curnick assisted Kareem Ahmed in giving this "kickback" scheme the
appearance of legitimacy.
7. On January 31, 2012, Defendant Curnick attended the deposition of Dr. Amir Friedman
to ensure that Dr. Friedman did not divulge the terms of his agreement with Physicians
Funding Solutions, LLC, a subsidiary of Landmark Medical Management LLC.
8. Kareem Ahmed and Defendant Charbonnet managed every aspect of the "kickback"
program and discouraged the physicians and the pharmacists from having direct contact
with each other.

9. Between 2010 and 2013, Kareem Ahmed paid Eduardo Anguizola, M.D. in excess of \$2,000,000.
10. Between 2010 and 2013, Kareem Ahmed paid Daniel Capen, M.D. in excess of two million and five hundred thousand dollars (\$2,500,000).
11. Between 2010 and 2013, Kareem Ahmed paid Tri-Star Industrial Medical Group Inc. owned by Michael Barri, D.C. in excess of one million dollars (\$1,000,000).
12. Between 2010 and 2013, Kareem Ahmed paid Rahil Khan M.D. in excess of one million dollars (\$1,000,000).
13. Between 2010 and 2013, Kareem Ahmed paid Randy Rosen, M.D. in excess of six hundred thousand dollars (\$600,000).
14. Between 2010 and 2013, Kareem Ahmed paid Regional Associates Medical Group owned by Robert J. Villapania, D.C. in excess of one million dollars (\$1,000,000).
15. Between 2010 and 2013, Kareem Ahmed paid Arsalan Pourteymour, M.D. and Performance Medical Group owned by David Evans, D.C. in excess of six hundred and fifty thousand dollars (\$650,000).
16. Between 2010 and 2013, Kareem Ahmed paid Curtis W. Hague in excess of eighth million dollars (\$8,000,000).

COUNT 2:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 650 of the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY, EDUARDO ANGUIZOLA, M.D, a person licensed under the Healing Arts Division of this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate, refund, commission, preference, patronage dividend, discount, and other consideration as compensation and inducement for referring patients, clients, and customers to Curt's Compounding Pharmacy in Fountain Valley, California

COUNT 3:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EDUARDO ANGUIZOLA, M.D, AND EVETTE CHARBONNET 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 American Claims Management Ins., AIG/Chartis, CNA Ins., Travelers Ins., Fireman's Fund Ins., ACIG, Birkshire Hathaway Homestate Companies, Farmers Ins., Liberty Mutual Ins., Zenith Ins., Zurich Ins., York, Tristar, State Farm Ins., Sentry Ins., State Compensation Insurance Fund, Pacific Compensation, MSIG, Markel FirstComp, Alaska National Ins. Co., Comp West Ins. Employers Ins., Gallagher Bassett, Sedgwick Ins., State Farm, SRS, Church Mutual, Tristar, ESIS, Adminsure, Patriot, Frank Gates, Elite, BBSI, Chubb Ins., Crum & Forster, Matrix, Seabright Ins., Avizent, York, Broadspire, SCRMA, AARLA, Southland Claims, One Beacon, Keenan & Associates, Loma Linda University, Bunch & Associates, Safeco, Athens, Guide One, Midwest, Athens, Meadowbrook, Cambridge, REM, Preferred Employers, ICW, Golden Eagle, Broadspire, Intercare, Midwest, Tower, CCMSI, Lumbermen's, National Interstate, Matrix, Kaiser, Preferred Employers, Hanover, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 4:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EDUARDO ANGUIZOLA, M.D, AND EVETTE CHARBONNET 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 City of Los Angeles, Vons, Southern California Gas Company, Disney, City of Santa Ana, City of Long Beach, City of San Bernardino, and 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.

COUNT 5:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, EDUARDO ANGUIZOLA, M.D, did unlawfully solicit, accept, and refer business to and from Med-Rx LLC, and Healthcare Finance Management LLC with the knowledge that, and with reckless disregard for whether Med-Rx LLC, and Healthcare Finance Management LLC intended to violate Penal Code section 550 and Insurance Code section 1871.4.

1 COUNT 6:

2 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 650 of the
3 Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY,
4 DANIEL ALEXANDER CAPEN, M.D., a person licensed under the Healing Arts Division of
5 this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept
6 any rebate, refund, commission, preference, patronage dividend, discount, and other
7 consideration as compensation and inducement for referring patients, clients, and customers to
8 Curt's Compounding Pharmacy in Fountain Valley, California

9 COUNT 7:

10 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
11 of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
12 DANIEL CAPEN, M.D. and EVETTE CHARBONNET, with the intent to defraud, did
13 knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to
14 present and use it, and to allow it to be presented to American Claims Management Ins.,
15 CNA Ins., Fireman's Fund Ins., Birkshire Hathaway Homestate Companies, Farmers Ins.,
16 Liberty Mutual Ins., Republic Indemnity, Riverstone Resources TIG Ins., Zenith Ins.,
17 AIG/Chartis, Gallagher Bassett, MSIG, State Compensation Insurance Fund, Sentry Ins.,
18 Comp West Ins., Markel FirstComp, Employers Ins. Sedgwick Ins.,
19 Alternative Services Concepts, Hartford, Alaska National Ins. Co., Tristar Risk Management,
20 ESIS, Travelers, Hartford, CorVel, SRS, State Farm, Kaiser, Zurich, AIMS, GAB
21 Robins, Frontier, Crum & Forster, Travelers, Guard Ins., in support of a false and
22 fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

23 COUNT 8:

24 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
25 of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
26 DANIEL CAPEN, M.D. and EVETTE CHARBONNET with the intent to defraud, did
27 knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to
28 present and use it, and to allow it to be presented to, City of Los Angeles, County of Los
29 Angeles, County of Los Angeles, Disney, Vons, City of Pasadena, City of Huntington Beach,
30 City of Santa Monica in support of a false and fraudulent claim, and did aid and abet, solicit, and
31 conspire with another to do the same.

32 COUNT 9:

33 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of the
34 Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, DANIEL CAPEN, M.D, did
35 unlawfully solicit, accept, and refer business to and from Physician Funding Solutions, LLC,
36 Med-Rx, LLC, and Healthcare Finance Management, LLC with the knowledge that, and with
37 reckless disregard for whether Physician Funding Solutions LLC, Med-Rx LLC, and
38 Healthcare Finance Management LLC intended to violate Penal Code section 550 and Insurance
39 Code section 1871.4.

COUNT 10:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 650 of the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY, RANDY ROSEN, M.D., a person licensed under the Healing Arts Division of this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate, refund, commission, preference, patronage dividend, discount, and other consideration as compensation and inducement for referring patients, clients, and customers to Curt's Compounding Pharmacy in Fountain Valley, California

COUNT 11:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY ROSEN, M.D. and EVETTE CHARBONNET 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 American Claims Management, Fireman's Fund, Birkshire Hathaway Homestate Companies, Farmers Ins., Liberty Mutual Ins., Zenith Ins., AIG (Chartis), Gallagher Bassett, Zurich, State Compensation Insurance Fund, Sentry Ins., CompWest Ins., Markel First Comp Ins., Employers Ins., Alaska National Ins. Co., ESIS, Broadspire, Hartford, Sedgwick Ins, WAUSAU Ins, SCRMA, Tristar, AIMS, Chubb Ins., CorVel, Frank Gates, Anthem Blue Cross, Crum & Forster in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 12:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY ROSEN, M.D. and EVETTE CHARBONNET 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 City of Los Angeles, County of Los Angeles, Marriott, Vons, Kaiser, Cannon, Southern California Gas Company, Exxon Mobile, Safeway, City of Burbank, Santa Ana United School District, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 13:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, RANDY ROSEN, M.D., did unlawfully solicit, accept, and refer business to and from Physician Funding Solutions, LLC, Med-Rx LLC, and Healthcare Finance Management, LLC with the knowledge that, and with reckless disregard for whether Physician Funding Solutions, LLC, Med-Rx LLC, and Healthcare Finance Management, LLC intended to violate Penal Code section 550 and Insurance Code section 1871.4.

1 COUNT 14:

2 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 650 of the
3 Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY,
4 MICHAEL BARRI, D.C., persons licensed under the Healing Arts
5 Division of this Code and the Chiropractic Initiative Act, and their Company Tri-Star Industrial
6 Medical Group, did unlawfully offer, deliver, receive, and accept any rebate, refund, commission,
7 preference, patronage dividend, discount, and other consideration as compensation
8 and inducement for referring patients, clients, and customers to Curt's Compounding Pharmacy in
9 Fountain Valley, California

10 COUNT 15:

11 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
12 of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
13 MICHAEL BARRI, D.C. and EVETTE CHARBONNET with the
14 intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing,
15 with the intent to present and use it, and to allow it to be presented to CNA Ins., Republic
16 Indemnity Ins., Liberty Mutual, Gallagher Bassett, ESIS, Intercare, Americal Commercial
17 Claims, Sedgwick Ins., Specialty Risk, Private Adjusting, Zurich, State Compensation Insurance
18 Fund, Zurich, AIG/Chartis, Church Mutual, ESIS, State Farm Ins., SRS, Travelers Ins., First
19 Comp, Hartford, Farmers, Employers Ins., Fireman's Fund Ins., York, Crum & Forster,
20 Sedgwick, CompWest, Tristar, Chubb Ins., and Pacific Comp Ins. in support of a false and
21 fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

22 COUNT 16:

23 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5)
24 of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
25 MICHAEL BARRI, D.C. and EVETTE CHARBONNET with the intent to defraud,
26 did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to
27 present and use it, and to allow it to be presented to Southern California Edison, City of
28 Santa Ana, City of Anaheim, Disney, Marriot, and City of Long Beach in support of a false and
Fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 17:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of the
Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, MICHAEL BARRI, D.C.
did unlawfully solicit, accept, and refer business to and from Physician Funding Solutions, LLC,
Med-Rx LLC, and Healthcare Finance Management LLC with the knowledge that, and with
reckless disregard for whether Physician Funding Solutions, LLC, Med-Rx LLC, and Healthcare
Finance Management, LLC intended to violate Penal Code section 550 and Insurance Code
section 1871.4.

1
2 COUNT 18:

3 On or about and between January 3, 2011 to December 31, 2012, in violation of Section 650 of
4 the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY,
5 RAHIL KHAN, M.D. a person licensed under the Healing Arts Division of this Code and the
6 Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate, refund,
7 commission, preference, patronage dividend, discount, and other consideration as compensation
8 and inducement for referring patients, clients, and customers to Curt's Compounding Pharmacy in
9 Fountain Valley, California

10 COUNT 19:

11 On or about and between January 3, 2011 to December 31, 2012, in violation of Section
12 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
13 RAHIL KHAN, M.D and EVETTE CHARBONNET with the intent to defraud, did knowingly
14 and unlawfully prepare, make, and subscribe a material writing, with the intent to present and
15 use it, and to allow it to be presented to Employers Ins., Sedgwick, State Compensation
16 Insurance Fund, Hartford Ins., Chubb Ins., Farmers Ins., ESIS, Gallagher Bassett, Crum &
17 Forester, Zurich Ins., Travelers Ins, Tristar Risk Management, CorVel, Matrix, York,
18 CompWest Ins., American Claims Management, AIG/Chartis, Alaska National Ins., SRS, First
19 Comp, Frank Gates, Seabright, and C.N.A. Ins., in support of a false and fraudulent claim, and
20 did aid and abet, solicit, and conspire with another to do the same.

21 COUNT 20:

22 On or about and between January 3, 2011 to December 31, 2012, in violation of Section
23 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
24 RAHIL KHAN, M.D AND EVETTE CHARBONNET with the intent to defraud, did knowingly
25 and unlawfully prepare, make, and subscribe a material writing, with the intent to present and
26 use it, and to allow it to be presented to Macy's, City of Riverside, City of Los Angeles,
27 Robertson's Ready Mix, Vons, County of San Bernardino, County of Riverside, and Disney in
28 support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to
do the same.

COUNT 21:

On or about and between January 3, 2011 to December 31, 2012, in violation of Section 549 of
The Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, RAHIL KHAN, M.D, did
unlawfully solicit, accept, and refer business to and from Med-RX LLC and Healthcare Finance
Management LLC with the knowledge that, and with reckless disregard for whether Med-RX
LLC and Healthcare Finance Management LLC intended to violate Penal Code section 550 and
Insurance Code section 1871.4,

COUNT 22:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 650 of the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY, ROBERT VILLAPANIA, D.C. a person licensed under the Healing Arts Division of this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate, refund, commission, preference, patronage dividend, discount, and other consideration as compensation and inducement for referring patients, clients, and customers to Curt's Compounding Pharmacy in Fountain Valley, California

COUNT 23:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT VILLAPANIA, D.C. and EVETTE CHARBONNET 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, Travelers Insurance, Sedgwick, Liberty Mutual Ins., First Comp Ins., Chubb Group, AIG/Chartis, Gallagher Bassett, Republic Indemnity, ESIS, Zenith Ins., Tristar, Seabright, C.N.A. Ins. American Claims Management, Employers Ins., Alaska National, SRS, Hartford, CompWest Ins., Fireman's Fund, Farmers, AIMS, and in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 24:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT VILLAPANIA, D.C. and EVETTE CHARBONNET 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 Marriott Claims, City of Santa Ana, County of Riverside, Disney, Foster Farms, Kaiser, City of Los Angeles, and City of Burbank in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

COUNT 25:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of The Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, ROBERT VILLAPANIA, D.C. did unlawfully solicit, accept, and refer business to and from Physicians Funding Solutions LLC and Healthcare Finance Management LLC with the knowledge that, and with reckless disregard for whether Physicians Funding Solutions LLC and Healthcare Finance Management LLC intended to violate Penal Code section 550 and Insurance Code section 1871.4.

1 COUNT 26:

2 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 650 of
3 the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY,
4 DAVID EVANS, D.C. and ARSALAN POURTEYMOUR, M.D., a person licensed under the
5 Healing Arts Division of this Code and the Chiropractic Initiative Act, did unlawfully offer,
6 deliver, receive, and accept any rebate, refund, commission, preference, patronage dividend,
discount, and other consideration as compensation and inducement for referring patients, clients,
and customers to Curt's Compounding Pharmacy in Fountain Valley, California

7 COUNT 27:

8 On or about and between June 15, 2010 to December 31, 2012, in violation of Section
9 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
10 DAVID EVANS, D.C. and ARSALAN POURTEYMOUR, M.D. and
11 EVETTE CHARBONNET with the intent to defraud, did knowingly and unlawfully prepare,
12 make, and subscribe a material writing, with the intent to present and use it, and to allow it to be
13 presented to State Compensation Insurance Fund, Travelers Ins., AIG/Chartis, Liberty Mutual,
14 Zenith Ins., Matrix, Frank Gates, Gallagher Bassett, Sedgwick, Safeway, Tristar, SRS, Vons,
Kaiser Permanente, First Comp, Matrix, SCRMA, Hartford, CorVel, Zurich, York, Farmers,
County of San Bernardino, Southern California Edison, CompWest, American Claims
Management, Fireman's Fund, in support of a false and fraudulent claim, and did aid and abet,
solicit, and conspire with another to do the same.

15 COUNT 28:

16 On or about and between June 15, 2010 to December 31, 2012, in violation of Section
17 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
18 DAVID EVANS, D.C. and ARSALAN POURTEYMOUR, M.D. and
19 EVETTE CHARBONNET with the intent to defraud, did knowingly and unlawfully prepare,
20 make, and subscribe a material writing, with the intent to present and use it, and to allow it to be
21 presented to Safeway, Vons, Kaiser Permanente, County of San Bernardino, Southern California
Edison, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.

22 COUNT 29:

23 On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of
24 The Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, DAVID EVANS, D.C.
25 and ARSALAN POURTEYMOUR, M.D. did unlawfully solicit, accept, and refer business to
26 and from Physicians Funding Solutions LLC and Healthcare Finance Management LLC with the
27 knowledge that, and with reckless disregard for whether Physicians Funding Solutions LLC and
28 Healthcare Finance Management LLC intended to violate Penal Code section 550 and
Insurance Code section 1871.4.

1 COUNT 30:

2 On or about and between September 1, 2012 to December 22, 2012, in violation of Section 650
3 of the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY,
4 CRAIG CHANIN, M.D., a persons licensed under the Healing Arts Division of
5 this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept
6 any rebate, refund, commission, preference, patronage dividend, discount, and other
consideration as compensation and inducement for referring patients, clients, and customers to
Curt's Compounding Pharmacy in Fountain Valley, California.

7 COUNT 31:

8 On or about and between September 1, 2012 to December 22, 2012, in violation of Section
9 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
10 CRAIG CHANIN, M.D. and EVETTE CHARBONNET, with the intent to defraud, did
11 knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to
12 present and use it, and to allow it to be presented to Liberty Mutual Ins., Zenith Ins., Employers
13 Ins., Gallagher Bassett, Berkshire Hathaway Homestate Companies, York, Zurich, Sedgwick,
14 Alaska National, ESIS, C.N.A. Ins., Sedgwick, Fireman's Fund, Crum & Forster, Kaiser,
American Claims Management, SRS, Travelers, Chubb Group, Hartford, Republic Indemnity,
State Farm, CorVel, Farmers, Sentry, AIG/Chartis, State Compensation Insurance Fund,
First Comp, ESIS, Crum & Forster, and Seabright, in support of a false
and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

15 COUNT 32:

16 On or about and between September 1, 2012 to December 22, 2012, in violation of Section
17 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY,
18 CRAIG CHANIN, M.D. and EVETTE CHARBONNET, with the intent to defraud, did
19 knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to
20 present and use it, and to allow it to be presented to City of Los Angeles, Disney, County of
San Bernardino, Macys, and Vons in support of a false and fraudulent claim, and did aid and
abet, solicit, and conspire with another to do the same.

COUNT 33:

On or about and between September 1, 2012 to December 22, 2012, in violation of Section 549 of The Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, CRAIG CHANIN, M.D., did unlawfully solicit, accept, and refer business to and from Healthcare Finance Management LLC with the knowledge that, and with reckless disregard for whether Healthcare Finance Management LLC intended to violate Penal Code section 550 and Insurance Code section 1871.4.

COUNT 34:

On or about and between June 15, 2010 to December 31, 2012, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, CURTIS WILLIAM HAGUE, did unlawfully solicit, accept, and refer business to and from PharmaFinance LLC with the knowledge that, and with reckless disregard for whether PharmaFinance LLC intended to violate Penal Code section 550 and Insurance Code section 1871.4.

COUNT 35:

On or about and between September 1, 2012 to December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, CURTIS WILLIAM HAGUE and EVETTE CHARBONNET 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 Liberty Mutual Ins., Zenith Ins., Employers Ins., Gallagher Bassett, Berkshire Hathaway Homestate Companies, York, Zurich, Sedgwick, Alaska National, C.N.A. Ins., Sedgwick, Fireman's Fund, Crum & Forster, American Claims Management, Travelers, Hartford, Republic Indemnity, State Farm, Farmers, Sentry, AIG/Chartis, State Compensation Insurance Fund, First Comp, Crum & Forster, and Seabright, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.

ENHANCEMENT(S)

As to Count(s) 1, 3, 4, 7, 8, 11, 12, 15, 16, 19, 20, 23, 24, 27, 28, 31, 32 and 35 it is further Alleged pursuant to Penal Code section 186.11(a)(1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that Defendant's, EDUARDO ANGUIZOLA, M.D., DANIEL CAPEN, M.D., RANDY ROSEN M.D., MICHAEL BARRI, D.C., RAHIL KHAN, M.D., ROBERT VILLAPANIA, D.C., DAVID EVANS, D.C., ARSALAN POURTEYMOUR, M.D., EVETTE CHARBONNET and CURTIS HAGUE engaged in a pattern of related fraudulent felony conduct involving the taking of more than five hundred thousand dollars (\$500,000).


1 As to Count(s) 2, and 6, it is further alleged pursuant to Penal Code section
2 12022.6(a)(3) (PROPERTY DAMAGE OVER \$1,300,000), that EDUARDO
3 ANGUIZOLA, M.D., DANIEL CAPEN, M.D., intentionally took, damaged, and destroyed
4 property valued in excess of one million three hundred thousand dollars (\$1,300,000) during
the commission and attempted commission of the above offense.

5 As to Count(s) 10, 14, 18, 22, 26, and 30 it is further alleged pursuant to Penal Code section
6 12022.6(a)(2) (PROPERTY DAMAGE OVER \$200,000), that RANDY ROSEN, M.D.,
7 MICHAEL BARRI, D.C., RAHIL KHAN, M.D., ROBERT VILLAPANIA, D.C.,
8 ARSALAN POURTEYMOUR, and DAVID EVANS and intentionally took, damaged and
destroyed property valued in excess of two hundred thousand dollars (\$200,000) during the
commission and attempted commission of the above offense.

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

11 DATED:

12 A TRUE BILL

13 
14 David Baker, Foreman, Grand Jury
15 County of Orange, State of California
16 For the year 2013 - 2014

17 
18 BY: SHADDI KAMILABIPOUR
19 Deputy District Attorney
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1 ---WITNESSES EXAMINED BEFORE THE GRAND JURY---

- 2 1. Camarano, Paul
3 2. Carter, Danielle
4 3. Cohrt, Chelsey
5 4. Garner, Norma
6 5. Shah, Mayank "Mike" Parimal
7 6. Sanchez, Angela Noel
8 7. Chan, Samuel MD
9 8. Friedman, Amir MD
10 9. Rahman, Hamid MD
11 10. Salazar, Alejandra
12 11. Rangan, Cyrus, M.D. (Toxicologist Expert)
13 12. Ferrone, Marcus, Pharm D. (Expert Pharmacist)
14 13. Knotts, Dennis
15 14. O'Rourke, Terry
16 15. Komberg, Edward, DC
17 16. Mays, Jessica
18 17. Pena, Andrew
19 18. Mays, Archie, M.D.
20 19. Pratley, Brent, MD
21 20. Lintemoot, Jaime, LA Coroner
22 21. Pena, Louise, M.E.
23 22. Fu, E., LA Coroner
24 23. Anderson, Dan, LA Coroner
25 24. De Hesa, Calvin, LAPD
26 25. White, Jennifer
27 26. Hokana, Lin, (Board of Pharmacy)
28 27. Wong, Joseph, (Board of Pharmacy)
29 28. Yamada, Anna K. (Board of Pharmacy)
30 29. Adriance, Adrienne

- 1 30. Mirza, Saira F.
- 2 31. Gutierrez, Joseph, PA
- 3 32. Lujan, Priscilla
- 4 33. Marraccino, Alida, (ACIG)
- 5 34. Sullivan, Nicole, (ACM)
- 6 35. Dannoff, Nancy, (AN)
- 7 36. Oard, Gordon, (BHHHC)
- 8 37. Camarco, Beth, (CLA)
- 9 38. Crates, Tracy, (CNA)
- 10 39. Hurtado, Christina, (County of SB)
- 11 40. Terrell, Don (C&F)
- 12 41. Kramer, Maria, (EMP)
- 13 42. Luce, Anne, (FMRS)
- 14 43. Auvinen, John, (FRMNS)
- 15 44. Dill, Christopher, (ICW)
- 16 45. Hurtado, Tony, (LM)
- 17 46. McPeak, Danelle, (MFC)
- 18 47. Daugherty, LuAnne, (PC)
- 19 48. Borrego, Fidel, (RI)
- 20 49. Spencer, Lane, (SCIF)
- 21 50. Ewing, Mike, (Sentry)
- 22 51. Lincoln, Frank, (TRVLRS)
- 23 52. Glover, Oliver, (ZEN)
- 24 53. Smith, Glen, (ZUR)
- 25 54. Whitley, Mark, (AI)
- 26 55. Torres, Tony, (CMPW)
- 27 56. Taras, Anthony (County of LA)
- 28 57. Saad, Talal (SDGWK)
58. Nielsen, Kristian, (AIG)
59. Riggs, John, (Disney)
60. Weitzman, Scott (OCDA)

61. Robbins, Christopher (OCDA)
62. Nichols, Fred (OCDA)
63. White, David (RCFL)
64. Duncan, Michele (OCDA)
65. Ascensio, Eddie (DOI)
66. Gross, Jeffrey, M.D.
67. Manguiat, Alex
68. Martinez, Sandra
69. Sambroski, Eugene
70. Martinez, Louie
71. Lara, Cathy

Presented by the Foreman of the Grand Jury of the County of Orange, State of California, for the year 2013 – 2014, in the presence of the Grand Jury, to the Superior Court of the State of California, in and for the County of Orange, and filed as a record of this court this 17th day of June, 2014.

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

BY: Rakin Hume

DEPUTY CLERK

R. HUME

TONY RACKAUCKAS, DISTRICT ATTORNEY
of the County of Orange, State of California

BY: Shaddi Kamiaipoor

SHADDI KAMIAIPOUR

Deputy District Attorney