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Advanced Professional Imaging Medical Group, Inc., A Professional Corporation & Sim Hoffman

Exhibit #	Document
1	The People of the State of California vs. Sim Carlisle Hoffman et al. (Felony Complaint no. 14CF0243)
2	CA Secretary of State: Statement of Information, 01/07/2009

FILED

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

JAN 27 2014

ALAN CARLSON, Clerk of the Court

MARIA GONZALES
DEPUTY

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

6	THE PEOPLE OF THE STATE OF CALIFORNIA,)	FELONY COMPLAINT
7)	
8	Plaintiff,)	
9)	14CF0243
10	vs.)	No.
11	SIM CARLISLE HOFFMAN 06/01/52)	OCDA WC14010012
12	E0255904)	
13	BETTER SLEEPING MEDICAL CENTER. INC.)	
14	ADVANCED PROFESSIONAL IMAGING MEDICAL)	
15	GROUP)	
16	SOUTHERN CALIFORNIA MEDICAL)	
17	DIAGNOSTICS GROUP, INC.)	
18	PACIFIC SLEEP MEDICAL GROUP, INC.)	
19	ADVANCED MEDICAL SUPPORT, INC.)	
20	THOMAS MICHAEL HERIC MD 11/03/36)	
21	D0407620)	
22)	
23)	
24	Defendant(s))	

20 The Orange County District Attorney charges that in Orange
21 County, California, the law was violated as follows:

22 COUNT 1: On or about and between December 10, 2008 and July 28,
23 2011, in violation of Section 550(a)(6) of the Penal Code
24 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
25 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
26 HERIC, with the intent to defraud, did knowingly and unlawfully
27 make and cause to be made a false and fraudulent claim to COUNTY
28 OF SAN BERNARDINO for payment of a 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.
(TIN:26-0778546)

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1 COUNT 2: On or about and between September 17, 2007 and July
2 28, 2011, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
8 presented to COUNTY OF SAN BERNARDINO, in support of a false and
9 fraudulent claim, and did aid and abet, solicit, and conspire
10 with another to do the same. (TIN:26-0778546)

8 COUNT 3: On or about and between January 26, 2001 and August
9 06, 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.
12 with the intent to defraud, did knowingly and unlawfully make
13 and cause to be made a false and fraudulent claim to COUNTY OF
14 SAN BERNARDINO for payment of a health care benefit in an amount
15 exceeding nine hundred fifty dollars (\$950), and did aid and
16 abet, solicit, and conspire with another to do the same. (TIN:
17 33-0565809) TO WIT: 3D IMAGING / MRI

15 COUNT 4: On or about and between May 11, 2011 and March 05,
16 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
19 INC., with the intent to defraud, did knowingly and unlawfully
20 make and cause to be made a false and fraudulent claim to COUNTY
21 OF SAN BERNARDINO for payment of a health care benefit in an
22 amount exceeding nine hundred fifty dollars (\$950), and did aid
23 and abet, solicit, and conspire with another to do the same.
24 (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

23 COUNT 5: On or about and between November 27, 2007 and December
24 04, 2012, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
27 HERIC, with the intent to defraud, did knowingly and unlawfully
28 make and cause to be made a false and fraudulent claim to CITY
OF LOS ANGELES for payment of a 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.
(TIN:26-0778546)

1 COUNT 6: On or about and between November 27, 2007 and December
2 04, 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
8 presented to CITY OF LOS ANGELES, in support of a false and
9 fraudulent claim, and did aid and abet, solicit, and conspire
10 with another to do the same.(TIN:26-0778546)

11 COUNT 7: On or about and between February 11, 2010 and January
12 01, 2012, in violation of Section 550(a)(6) of the Penal Code
13 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
14 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
15 with the intent to defraud, did knowingly and unlawfully make
16 and cause to be made a false and fraudulent claim to CITY OF LOS
17 ANGELES for payment of a health care benefit in an amount
18 exceeding nine hundred fifty dollars (\$950), and did aid and
19 abet, solicit, and conspire with another to do the same.
20 (TIN:33-0565809) TO WIT: 3D IMAGING / MRI

21 COUNT 8: On or about and between August 18, 2010 and November
22 21, 2011, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
25 HERIC, with the intent to defraud, did knowingly and unlawfully
26 make and cause to be made a false and fraudulent claim to COUNTY
27 OF LOS ANGELES for payment of a health care benefit in an amount
28 exceeding nine hundred fifty dollars (\$950), and did aid and
29 abet, solicit, and conspire with another to do the same.
30 (TIN:26-0778546)

31 COUNT 9: On or about and between November 27, 2007 and December
32 04, 2012, in violation of Section 550(a)(5) of the Penal Code
33 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
34 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
35 and THOMAS HERIC, with the intent to defraud, did knowingly and
36 unlawfully prepare, make, and subscribe a material writing, with
37 the intent to present and use it, and to allow it to be
38 presented to COUNTY OF LOS ANGELES, in support of a false and
39 fraudulent claim, and did aid and abet, solicit, and conspire
40 with another to do the same.(TIN:26-0778545)

1 COUNT 10: On or about and between September 28, 2012 and
2 November 27, 2013, in violation of Section 550(a)(6) of the
3 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: PACIFIC SLEEP MEDICAL GROUP, INC. with
5 the intent to defraud, did knowingly and unlawfully make and
6 cause to be made a false and fraudulent claim to COUNTY OF LOS
7 ANGELES for payment of a health care benefit in an amount
8 exceeding nine hundred fifty dollars (\$950), and did aid and
9 abet, solicit, and conspire with another to do the same.
10 (TIN:27-2677504)

11 COUNT 11: On or about and between July 26, 2010 and August 04,
12 2011, in violation of Section 550(a)(6) of the Penal Code
13 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
14 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
15 with the intent to defraud, did knowingly and unlawfully make
16 and cause to be made a false and fraudulent claim to COUNTY OF
17 LOS ANGELES for payment of a health care benefit in an amount
18 exceeding nine hundred fifty dollars (\$950), and did aid and
19 abet, solicit, and conspire with another to do the same.
20 (TIN:33-0565809) TO WIT: 3D IMAGING / MRI

21 COUNT 12: On or about and between July 11, 2011 and November
22 04, 2013, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
25 INC., with the intent to defraud, did knowingly and unlawfully
26 make and cause to be made a false and fraudulent claim to COUNTY
27 OF LOS ANGELES for payment of a health care benefit in an amount
28 exceeding nine hundred fifty dollars (\$950), and did aid and
abet, solicit, and conspire with another to do the same.
(TIN:27-3236269) TO WIT: 3D IMAGING / MRI

1 COUNT 13: On or about and between November 24, 2007 and July
2 08, 2011, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to COUNTY OF LOS ANGELES for
7 payment of a health care benefit in an amount exceeding nine
8 hundred fifty dollars (\$950), and did aid and abet, solicit, and
9 conspire with another to do the same. (TIN:20-8804326)

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1 COUNT 14: On or about and between March 30, 2006 and January
2 17, 2011, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
5 with the intent to defraud, did knowingly and unlawfully make
6 and cause to be made a false and fraudulent claim to COUNTY OF
7 RIVERSIDE for payment of a health care benefit in an amount
8 exceeding nine hundred fifty dollars (\$950), and did aid and
9 abet, solicit, and conspire with another to do the same.
10 (TIN:33-0565809) TO WIT: 3D IMAGING / MRI

8 COUNT 15: On or about and between June 20, 2011 and September
9 09, 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to COUNTY
14 OF RIVERSIDE for payment of a health care benefit in an amount
15 exceeding nine hundred fifty dollars (\$950), and did aid and
16 abet, solicit, and conspire with another to do the same.
17 (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

15 COUNT 16: On or about and between May 15, 2008 and July 12,
16 2012, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
19 HERIC, with the intent to defraud, did knowingly and unlawfully
20 make and cause to be made a false and fraudulent claim to COUNTY
21 OF RIVERSIDE for payment of a health care benefit in an amount
22 exceeding nine hundred fifty dollars (\$950), and did aid and
23 abet, solicit, and conspire with another to do the same.(TIN:
24 26-0778546)

23 COUNT 17: On or about and between May 15, 2008 and July 12,
24 2012, in violation of Section 550(a)(5) of the Penal Code
25 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
26 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
27 and THOMAS HERIC, with the intent to defraud, did knowingly and
28 unlawfully prepare, make, and subscribe a material writing, with
the intent to present and use it, and to allow it to be
presented to 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.(TIN: 26-0778546)

1 COUNT 18: On or about and between August 27, 2007 and December
2 14, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
5 with the intent to defraud, did knowingly and unlawfully make
6 and cause to be made a false and fraudulent claim to COUNTY OF
7 RIVERSIDE for payment of a health care benefit in an amount
8 exceeding nine hundred fifty dollars (\$950), and did aid and
9 abet, solicit, and conspire with another to do the same. (TIN:
10 33-0565809) TO WIT: NERVE TEST

11 COUNT 19: On or about and between February 07, 2005 and March
12 08, 2011, in violation of Section 550(a)(6) of the Penal Code
13 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
14 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
15 with the intent to defraud, did knowingly and unlawfully make
16 and cause to be made a false and fraudulent claim to COUNTY OF
17 RIVERSIDE for payment of a health care benefit in an amount
18 exceeding nine hundred fifty dollars (\$950), and did aid and
19 abet, solicit, and conspire with another to do the same. (TIN:
20 33-0565809) TO WIT: 3D IMAGING / MRI

21 COUNT 20: On or about and between June 07, 2010 and September
22 14, 2011, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
25 HERIC, with the intent to defraud, did knowingly and unlawfully
26 make and cause to be made a false and fraudulent claim to COUNTY
27 OF SAN DIEGO for payment of a health care benefit in an amount
28 exceeding nine hundred fifty dollars (\$950), and did aid and
29 abet, solicit, and conspire with another to do the same.
(TIN:26-0778546)

30 COUNT 21: On or about and between June 07, 2010 and September
31 14, 2011, in violation of Section 550(a)(5) of the Penal Code
32 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
33 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
34 and THOMAS HERIC, with the intent to defraud, did knowingly and
35 unlawfully prepare, make, and subscribe a material writing, with
36 the intent to present and use it, and to allow it to be
37 presented to COUNTY OF SAN DIEGO, in support of a false and
38 fraudulent claim, and did aid and abet, solicit, and conspire
39 with another to do the same. (TIN:26-0778546)

1 COUNT 22: On or about and between October 15, 2007 and July 28,
2 2011, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
5 HERIC, with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to
7 TRAVELERS for payment of a health care benefit in an amount
8 exceeding nine hundred fifty dollars (\$950), and did aid and
9 abet, solicit, and conspire with another to do the same.
10 (TIN:26-0778546)

11 COUNT 23: On or about and between September 17, 2007 and July
12 28, 2011, in violation of Section 550(a)(5) of the Penal Code
13 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
14 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
15 and THOMAS HERIC, with the intent to defraud, did knowingly and
16 unlawfully prepare, make, and subscribe a material writing, with
17 the intent to present and use it, and to allow it to be
18 presented to TRAVELERS, in support of a false and fraudulent
19 claim, and did aid and abet, solicit, and conspire with another
20 to do the same. (TIN:26-0778546)

21 COUNT 24: On or about and between May 07, 2012 and December 24,
22 2013, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
25 INC., with the intent to defraud, did knowingly and unlawfully
26 make and cause to be made a false and fraudulent claim to
27 TRAVELERS for payment of a health care benefit in an amount
28 exceeding nine hundred fifty dollars (\$950), and did aid and
29 abet, solicit, and conspire with another to do the same.
30 (TIN:27-2677504)

31 COUNT 25: On or about and between June 07, 2005 and July 16,
32 2009, in violation of Section 550(a)(6) of the Penal Code
33 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
34 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
35 with the intent to defraud, did knowingly and unlawfully make
36 and cause to be made a false and fraudulent claim to TRAVELERS
37 for payment of a health care benefit in an amount exceeding nine
38 hundred fifty dollars (\$950), and did aid and abet, solicit, and
39 conspire with another to do the same. (TIN:33-0565809) TO WIT:
40 NERVE TEST

1 COUNT 26: On or about and between January 17, 2005 and November
2 21, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
5 with the intent to defraud, did knowingly and unlawfully make
6 and cause to be made a false and fraudulent claim to TRAVELERS
7 for payment of a health care benefit in an amount exceeding nine
8 hundred fifty dollars (\$950), and did aid and abet, solicit, and
9 conspire with another to do the same.(TIN:33-0565809) TO WIT: 3D
10 IMAGING / MRI

8 COUNT 27: On or about and between September 10, 2007 and
9 November 21, 2013, in violation of Section 550(a)(6) of the
10 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
11 HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with
12 the intent to defraud, did knowingly and unlawfully make and
13 cause to be made a false and fraudulent claim to TRAVELERS for
14 payment of a health care benefit in an amount exceeding nine
15 hundred fifty dollars (\$950), and did aid and abet, solicit, and
16 conspire with another to do the same.(TIN: 20-8804326)

15 COUNT 28: On or about and between July 11, 2011 and December
16 30, 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
19 INC., with the intent to defraud, did knowingly and unlawfully
20 make and cause to be made a false and fraudulent claim to
21 TRAVELERS for payment of a health care benefit in an amount
22 exceeding nine hundred fifty dollars (\$950), and did aid and
23 abet, solicit, and conspire with another to do the same.
24 (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

22 COUNT 29: On or about and between February 05, 2008 and June
23 24, 2010, in violation of Section 550(a)(6) of the Penal Code
24 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
25 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
26 HERIC, with the intent to defraud, did knowingly and unlawfully
27 make and cause to be made a false and fraudulent claim to
28 REPUBLIC INDEMNITY for payment of a 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.
(TIN: 26-0778546)

/

1 COUNT 30: On or about and between February 05, 2008 and June
2 24, 2010, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
8 presented to REPUBLIC INDEMNITY, in support of a false and
9 fraudulent claim, and did aid and abet, solicit, and conspire
10 with another to do the same.(TIN: 26-0778546)

8 COUNT 31: On or about and between April 25, 2013 and May 29,
9 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to
14 REPUBLIC INDEMNITY for payment of a health care benefit in an
15 amount exceeding nine hundred fifty dollars (\$950), and did aid
16 and abet, solicit, and conspire with another to do the same.
17 (TIN: 27-2677504)

15 COUNT 32: On or about and between February 04, 2010 and
16 December 23, 2013, in violation of Section 550(a)(6) of the
17 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
18 HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS
19 GROUP, INC., with the intent to defraud, did knowingly and
20 unlawfully make and cause to be made a false and fraudulent
21 claim to REPUBLIC INDEMNITY for payment of a health care benefit
22 in an amount exceeding nine hundred fifty dollars (\$950), and
23 did aid and abet, solicit, and conspire with another to do the
24 same. (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

23 COUNT 33: On or about and between June 09, 2010 and February
24 21, 2012, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
27 with the intent to defraud, did knowingly and unlawfully make
28 and cause to be made a false and fraudulent claim to REPUBLIC
INDEMNITY for payment of a 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.(TIN:
33-0565809) TO WIT: 3D IMAGING / MRI

1 COUNT 34: On or about and between September 06, 2011 and April
2 26, 2012, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC. with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to REPUBLIC INDEMNITY for payment
7 of a health care benefit in an amount exceeding nine hundred
8 fifty dollars (\$950), and did aid and abet, solicit, and
9 conspire with another to do the same. (TIN: 20-8804326)

10 COUNT 35: On or about and between April 30, 2008 and August 04,
11 2010, in violation of Section 550(a)(6) of the Penal Code
12 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
13 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
14 HERIC, with the intent to defraud, did knowingly and unlawfully
15 make and cause to be made a false and fraudulent claim to CRUM &
16 FORSTER for payment of a health care benefit in an amount
17 exceeding nine hundred fifty dollars (\$950), and did aid and
18 abet, solicit, and conspire with another to do the same. (TIN:
19 26-0778546)

20 COUNT 36: On or about and between April 30, 2008 and August 04,
21 2010, in violation of Section 550(a)(5) of the Penal Code
22 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
23 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
24 and THOMAS HERIC, with the intent to defraud, did knowingly and
25 unlawfully prepare, make, and subscribe a material writing, with
26 the intent to present and use it, and to allow it to be
27 presented to CRUM & FORSTER, in support of a false and
28 fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same. (TIN: 26-0778546)

COUNT 37: On or about and between January 18, 2008 and January
15, 2010, in violation of Section 550(a)(6) of the Penal Code
(MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
HERIC, with the intent to defraud, did knowingly and unlawfully
make and cause to be made a false and fraudulent claim to
BERKSHIRE HATHAWAY HOMESTATE CO. for payment of a 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. (TIN: 26-0778546)

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1 COUNT 38: On or about and between August 11, 2006 and October
2 04, 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
presented to BERKSHIRE HATHAWAY HOMESTATE CO., in support of a
false and fraudulent claim, and did aid and abet, solicit, and
conspire with another to do the same. (TIN: 26-0778546)

8 COUNT 39: On or about and between August 11, 2006 and October
9 04, 2012, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
12 with the intent to defraud, did knowingly and unlawfully make
13 and cause to be made a false and fraudulent claim to BERKSHIRE
14 HATHAWAY HOMESTATE CO. for payment of a 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.
(TIN:33-0565809) TO WIT: NERVE TEST

15 COUNT 40: On or about and between January 06, 2009 and February
16 13, 2012, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
19 with the intent to defraud, did knowingly and unlawfully make
20 and cause to be made a false and fraudulent claim to BERKSHIRE
21 HATHAWAY HOMESTATE CO. for payment of a 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.
(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

22
23 COUNT 41: On or about and between July 13, 2011 and December
24 17, 2013, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
27 INC., with the intent to defraud, did knowingly and unlawfully
28 make and cause to be made a false and fraudulent claim to
BERSHIRE HATHAWAY HOMESTATE CO. for payment of a 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. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

1 COUNT 42: On or about and between August 13, 2008 and March 25,
2 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to BERKSHIRE HATHAWAY HOMESTATE CO.
7 for payment of a health care benefit in an amount exceeding nine
8 hundred fifty dollars (\$950), and did aid and abet, solicit, and
9 conspire with another to do the same. (TIN: 20-8804326)

10 COUNT 43: On or about and between March 11, 2008 and November
11 19, 2013, in violation of Section 550(a)(6) of the Penal Code
12 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
13 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
14 HERIC, with the intent to defraud, did knowingly and unlawfully
15 make and cause to be made a false and fraudulent claim to AIG
16 (CHARTIS) for payment of a health care benefit in an amount
17 exceeding nine hundred fifty dollars (\$950), and did aid and
18 abet, solicit, and conspire with another to do the same.
19 (TIN:26-0778546)

20 COUNT 44: On or about and between April 24, 2008 and May 16,
21 2011, in violation of Section 550(a)(5) of the Penal Code
22 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
23 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
24 and THOMAS HERIC, with the intent to defraud, did knowingly and
25 unlawfully prepare, make, and subscribe a material writing, with
26 the intent to present and use it, and to allow it to be
27 presented to AIG (CHARTIS), in support of a false and fraudulent
28 claim, and did aid and abet, solicit, and conspire with another
to do the same. (TIN: 26-0778546)

29 COUNT 45: On or about and between July 31, 2012 and October 30,
30 2013, in violation of Section 550(a)(6) of the Penal Code
31 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
32 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
33 INC., with the intent to defraud, did knowingly and unlawfully
34 make and cause to be made a false and fraudulent claim to AIG
35 (CHARTIS) for payment of a health care benefit in an amount
36 exceeding nine hundred fifty dollars (\$950), and did aid and
37 abet, solicit, and conspire with another to do the same. (TIN:
38 27-2677504)

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1 COUNT 46: On or about and between May 18, 2011 and November 26,
2 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
5 INC., with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to AIG
7 (CHARTIS) for payment of a health care benefit in an amount
8 exceeding nine hundred fifty dollars (\$950), and did aid and
9 abet, solicit, and conspire with another to do the same.(TIN:
10 27-3236269) TO WIT: 3D IMAGING / MRI

8 COUNT 47: On or about and between July 25, 2006 and July 15,
9 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
12 with the intent to defraud, did knowingly and unlawfully make
13 and cause to be made a false and fraudulent claim to AIG
14 (CHARTIS) for payment of a health care benefit in an amount
15 exceeding nine hundred fifty dollars (\$950), and did aid and
16 abet, solicit, and conspire with another to do the same.(TIN:
17 33-0565809) TO WIT: 3D IMAGING / MRI

15 COUNT 48: On or about and between September 17, 2007 and
16 November 25, 2013, in violation of Section 550(a)(6) of the
17 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
18 HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with
19 the intent to defraud, did knowingly and unlawfully make and
20 cause to be made a false and fraudulent claim to AIG (CHARTIS)
21 for payment of a health care benefit in an amount exceeding nine
22 hundred fifty dollars (\$950), and did aid and abet, solicit, and
23 conspire with another to do the same.(TIN: 20-8804326)

22 COUNT 49: On or about and between March 13, 2008 and August 16,
23 2011, in violation of Section 550(a)(6) of the Penal Code
24 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
25 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
26 HERIC, with the intent to defraud, did knowingly and unlawfully
27 make and cause to be made a false and fraudulent claim to CNA
28 INS. for payment of a 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.(TIN:
26-0778546)

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1 COUNT 50: On or about and between March 13, 2008 and August 16,
2 2011, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
8 presented to CNA INS., in support of a false and fraudulent
9 claim, and did aid and abet, solicit, and conspire with another
10 to do the same. (TIN: 260778546)

8 COUNT 51: On or about and between July 27, 2012 and March 20,
9 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to CNA
14 INS. for payment of a health care benefit in an amount exceeding
15 nine hundred fifty dollars (\$950), and did aid and abet,
16 solicit, and conspire with another to do the same. (TIN:
17 27-2677504)

15 COUNT 52: On or about and between May 17, 2005 and January 08,
16 2010, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
19 with the intent to defraud, did knowingly and unlawfully make
20 and cause to be made a false and fraudulent claim to CNA INS.
21 for payment of a health care benefit in an amount exceeding nine
22 hundred fifty dollars (\$950), and did aid and abet, solicit, and
23 conspire with another to do the same. (TIN:33-0565809) TO WIT:
24 NERVE TEST

23 COUNT 53: On or about and between July 06, 2010 and February
24 11, 2013, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
27 with the intent to defraud, did knowingly and unlawfully make
28 and cause to be made a false and fraudulent claim to CNA INS.
for payment of a 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. (TIN: 33-0565809) TO WIT:
3D IMAGING / MRI

1 COUNT 54: On or about and between December 21, 2011 and April
2 26, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
5 INC., with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to CNA
7 INS for payment of a health care benefit in an amount exceeding
8 nine hundred fifty dollars (\$950), and did aid and abet,
9 solicit, and conspire with another to do the same. (TIN:
10 27-3236269) TO WIT: 3D IMAGING / MRI

8 COUNT 55: On or about and between July 13, 2011 and April 25,
9 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
12 defraud, did knowingly and unlawfully make and cause to be made
13 a false and fraudulent claim to CNA INS. for payment of a health
14 care benefit in an amount exceeding nine hundred fifty dollars
15 (\$950), and did aid and abet, solicit, and conspire with another
16 to do the same. (TIN: 20-8804326)

15 COUNT 56: On or about and between February 04, 2008 and August
16 01, 2011, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
19 HERIC, with the intent to defraud, did knowingly and unlawfully
20 make and cause to be made a false and fraudulent claim to FIRST
21 COMP INS. for payment of a health care benefit in an amount
22 exceeding nine hundred fifty dollars (\$950), and did aid and
23 abet, solicit, and conspire with another to do the same. (TIN:
24 26-0778546)

22 COUNT 57: On or about and between February 04, 2008 and August
23 01, 2011, in violation of Section 550(a)(5) of the Penal Code
24 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
25 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
26 and THOMAS HERIC, with the intent to defraud, did knowingly and
27 unlawfully prepare, make, and subscribe a material writing, with
28 the intent to present and use it, and to allow it to be
presented to FIRST COMP INS., in support of a false and
fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same. (26-0778546)

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1 COUNT 58: On or about and between March 31, 2009 and June 23,
2 2011, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
5 with the intent to defraud, did knowingly and unlawfully make
6 and cause to be made a false and fraudulent claim to FIRST COMP
7 INS. for payment of a health care benefit in an amount exceeding
8 nine hundred fifty dollars (\$950), and did aid and abet,
9 solicit, and conspire with another to do the same.(TIN:
10 33-0565809) TO WIT: 3D IMAGING / MRI

8 COUNT 59: On or about and between January 20, 2012 and December
9 23, 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to FIRST
14 COMP INS. for payment of a health care benefit in an amount
15 exceeding nine hundred fifty dollars (\$950), and did aid and
16 abet, solicit, and conspire with another to do the same.(TIN:
17 27-3236269) TO WIT: 3D IMAGING / MRI

15 COUNT 60: On or about and between September 28, 2009 and April
16 30, 2012, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
19 defraud, did knowingly and unlawfully make and cause to be made
20 a false and fraudulent claim to FIRST COMP INS. for payment of a
21 health care benefit in an amount exceeding nine hundred fifty
22 dollars (\$950), and did aid and abet, solicit, and conspire with
23 another to do the same. (TIN: 20-8804326)

22 COUNT 61: On or about and between February 05, 2008 and January
23 22, 2010, in violation of Section 550(a)(6) of the Penal Code
24 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
25 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
26 HERIC, with the intent to defraud, did knowingly and unlawfully
27 make and cause to be made a false and fraudulent claim to
28 HARTFORD INS. for payment of a health care benefit in an amount
29 exceeding nine hundred fifty dollars (\$950), and did aid and
30 abet, solicit, and conspire with another to do the same.(TIN:
31 26-0778546)

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1 COUNT 62: On or about and between February 05, 2008 and January
2 22, 2010, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
presented to HARTFORD INS., in support of a false and fraudulent
claim, and did aid and abet, solicit, and conspire with another
to do the same. (TIN: 26-0778546)

8 COUNT 63: On or about July 30, 2012, in violation of Section 550
9 (a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY,
10 SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA
11 MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did
12 knowingly and unlawfully make and cause to be made a false and
13 fraudulent claim to HARTFORD INS. for payment of a health care
14 benefit in an amount exceeding nine hundred fifty dollars
(\$950), and did aid and abet, solicit, and conspire with another
to do the same. (TIN: 27-2677504)

15 COUNT 64: On or about and between April 10, 2010 and April 12,
16 2010, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
19 defraud, did knowingly and unlawfully make and cause to be made
20 a false and fraudulent claim to HARTFORD INS. for payment of a
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. (TIN: 20-8804326)

21 COUNT 65: On or about and between February 04, 2008 and July
22 31, 2008, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
25 HERIC, with the intent to defraud, did knowingly and unlawfully
26 make and cause to be made a false and fraudulent claim to MATRIX
27 INS. for payment of a health care benefit in an amount exceeding
28 nine hundred fifty dollars (\$950), and did aid and abet,
solicit, and conspire with another to do the same.
(TIN:26-0778546)

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1 COUNT 66: On or about and between February 04, 2008 and July
2 31, 2008, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
8 presented to MARTIX INS., in support of a false and fraudulent
9 claim, and did aid and abet, solicit, and conspire with another
10 to do the same. (TIN: 26-0778546)

11 COUNT 67: On or about and between October 16, 2008 and July 06,
12 2010, in violation of Section 550(a)(6) of the Penal Code
13 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
14 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
15 HERIC, with the intent to defraud, did knowingly and unlawfully
16 make and cause to be made a false and fraudulent claim to
17 SEABRIGHT INSURANCE COMPANY for payment of a health care benefit
18 in an amount exceeding nine hundred fifty dollars (\$950), and
19 did aid and abet, solicit, and conspire with another to do the
20 same. (TIN: 26-0778546)

21 COUNT 68: On or about and between October 16, 2008 and July 06,
22 2010, in violation of Section 550(a)(5) of the Penal Code
23 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
24 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
25 and THOMAS HERIC, with the intent to defraud, did knowingly and
26 unlawfully prepare, make, and subscribe a material writing, with
27 the intent to present and use it, and to allow it to be
28 presented to EMPLOYERS INS., in support of a false and
fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same. (26-0778546)

29 COUNT 69: On or about and between February 05, 2008 and
30 September 14, 2011, in violation of Section 550(a)(6) of the
31 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
32 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
33 and THOMAS HERIC, with the intent to defraud, did knowingly and
34 unlawfully make and cause to be made a false and fraudulent
35 claim to EMPLOYERS INS. for payment of a health care benefit in
36 an amount exceeding nine hundred fifty dollars (\$950), and did
37 aid and abet, solicit, and conspire with another to do the same.
38 (TIN: 26-0778546)

1 COUNT 70: On or about and between February 05, 2008 and
2 September 14, 2011, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM
4 CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL
5 CENTER, INC. and THOMAS HERIC, with the intent to defraud, did
6 knowingly and unlawfully prepare, make, and subscribe a material
7 writing, with the intent to present and use it, and to allow it
8 to be presented to EMPLOYERS INS., in support of a false and
9 fraudulent claim, and did aid and abet, solicit, and conspire
10 with another to do the same. (TIN: 26-0778546)

8 COUNT 71: On or about and between April 24, 2012 and November
9 13, 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to
14 EMPLOYERS INC. for payment of a health care benefit in an amount
15 exceeding nine hundred fifty dollars (\$950), and did aid and
16 abet, solicit, and conspire with another to do the same. (TIN:
17 27-2677504)

15 COUNT 72: On or about and between March 31, 2011 and January
16 09, 2012, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
19 with the intent to defraud, did knowingly and unlawfully make
20 and cause to be made a false and fraudulent claim to EMPLOYERS
21 INS. for payment of a health care benefit in an amount exceeding
22 nine hundred fifty dollars (\$950), and did aid and abet,
23 solicit, and conspire with another to do the same. (TIN:
24 33-0565809) TO WIT: 3D IMAGING / MRI

23 COUNT 73: On or about and between June 28, 2012 and November
24 06, 2013, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
27 INC., with the intent to defraud, did knowingly and unlawfully
28 make and cause to be made a false and fraudulent claim to
EMPLOYERS INS. for payment of a 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. (TIN:
27-3236269) TO WIT: 3D IMAGING / MRI

1 COUNT 74: On or about and between November 27, 2007 and October
2 10, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to EMPLOYERS INS. for payment of a
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.(TIN: 20-8804326)

7
8 COUNT 75: On or about and between January 11, 2008 and January
9 25, 2010, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
12 HERIC, with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to SCRMA
14 INS. for payment of a health care benefit in an amount exceeding
15 nine hundred fifty dollars (\$950), and did aid and abet,
16 solicit, and conspire with another to do the same.(TIN:
17 26-0778546)

18
19 COUNT 76: On or about and between January 11, 2008 and January
20 25, 2010, in violation of Section 550(a)(5) of the Penal Code
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
22 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
23 and THOMAS HERIC, with the intent to defraud, did knowingly and
24 unlawfully prepare, make, and subscribe a material writing, with
25 the intent to present and use it, and to allow it to be
26 presented to SCRMA INS., in support of a false and fraudulent
27 claim, and did aid and abet, solicit, and conspire with another
28 to do the same. (TIN: 26-0778546)

29
30 COUNT 77: On or about and between March 13, 2008 and June 25,
31 2010, in violation of Section 550(a)(6) of the Penal Code
32 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
33 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
34 HERIC, with the intent to defraud, did knowingly and unlawfully
35 make and cause to be made a false and fraudulent claim to
36 SPECIALY RISK SERVICES INS. for payment of a health care benefit
37 in an amount exceeding nine hundred fifty dollars (\$950), and
38 did aid and abet, solicit, and conspire with another to do the
same.(TIN: 26-0778546)

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1 COUNT 78: On or about and between March 13, 2008 and June 25,
2 2010, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
8 presented to SPECIALTY RISK SERVICES INS., in support of a false
9 and fraudulent claim, and did aid and abet, solicit, and
10 conspire with another to do the same.(TIN: 26-0778546)

11 COUNT 79: On or about and between January 28, 2008 and March
12 24, 2011, in violation of Section 550(a)(6) of the Penal Code
13 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
14 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
15 HERIC, with the intent to defraud, did knowingly and unlawfully
16 make and cause to be made a false and fraudulent claim to ZENITH
17 INS. for payment of a health care benefit in an amount exceeding
18 nine hundred fifty dollars (\$950), and did aid and abet,
19 solicit, and conspire with another to do the same.(TIN:
20 26-0778546)

21 COUNT 80: On or about and between January 28, 2008 and March
22 24, 2011, in violation of Section 550(a)(5) of the Penal Code
23 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
24 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
25 and THOMAS HERIC, with the intent to defraud, did knowingly and
26 unlawfully prepare, make, and subscribe a material writing, with
27 the intent to present and use it, and to allow it to be
28 presented to ZENITH INS., in support of a false and fraudulent
claim, and did aid and abet, solicit, and conspire with another
to do the same.(TIN: 26-0778546)

29 COUNT 81: On or about and between December 09, 2004 and March
30 07, 2008, in violation of Section 550(a)(6) of the Penal Code
31 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
32 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
33 with the intent to defraud, did knowingly and unlawfully make
34 and cause to be made a false and fraudulent claim to ZENITH INS.
35 for payment of a health care benefit in an amount exceeding nine
36 hundred fifty dollars (\$950), and did aid and abet, solicit, and
37 conspire with another to do the same.(TIN: 33-0565809) TO WIT:
38 NERVE TEST

1 COUNT 82: On or about and between March 03, 2010 and June 24,
2 2011, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
5 with the intent to defraud, did knowingly and unlawfully make
6 and cause to be made a false and fraudulent claim to ZENITH INS.
7 for payment of a health care benefit in an amount exceeding nine
8 hundred fifty dollars (\$950), and did aid and abet, solicit, and
9 conspire with another to do the same.(TIN: 33-0565809) TO WIT:
10 3D IMAGING / MRI

8 COUNT 83: On or about and between July 14, 2011 and May 14,
9 2012, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to ZENITH
14 INS. for payment of a health care benefit in an amount exceeding
15 nine hundred fifty dollars (\$950), and did aid and abet,
16 solicit, and conspire with another to do the same.(TIN:
17 27-3236269) TO WIT: 3D IMAGING / MRI

15 COUNT 84: On or about and between October 03, 2006 and July 16,
16 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
19 defraud, did knowingly and unlawfully make and cause to be made
20 a false and fraudulent claim to ZENITH INS. for payment of a
21 health care benefit in an amount exceeding nine hundred fifty
22 dollars (\$950), and did aid and abet, solicit, and conspire with
23 another to do the same.(TIN: 20-8804326)

22 COUNT 85: On or about and between June 25, 2008 and January 25,
23 2010, in violation of Section 550(a)(6) of the Penal Code
24 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
25 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
26 HERIC, with the intent to defraud, did knowingly and unlawfully
27 make and cause to be made a false and fraudulent claim to SENTRY
28 INS. for payment of a health care benefit in an amount exceeding
29 nine hundred fifty dollars (\$950), and did aid and abet,
30 solicit, and conspire with another to do the same.(TIN:
31 26-0778546)

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1 COUNT 86: On or about and between June 25, 2008 and January 25,
2 2010, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 the intent to present and use it, and to allow it to be
8 presented to SENTRY INS., in support of a false and fraudulent
9 claim, and did aid and abet, solicit, and conspire with another
10 to do the same. (TIN:26-0778546)

8 COUNT 87: On or about and between January 09, 2008 and August
9 15, 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his
11 company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC,
12 with the intent to defraud, did knowingly and unlawfully make
13 and cause to be made a false and fraudulent claim to ZURICH INS.
14 for payment of a health care benefit in an amount exceeding nine
15 hundred fifty dollars (\$950), and did aid and abet, solicit, and
16 conspire with another to do the same. (TIN: 26-0778546)

15 COUNT 88: On or about and between January 09, 2008 and August
16 15, 2013, in violation of Section 550(a)(5) of the Penal Code
17 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
18 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
19 and THOMAS HERIC, with the intent to defraud, did knowingly and
20 unlawfully prepare, make, and subscribe a material writing, with
21 the intent to present and use it, and to allow it to be
22 presented to ZURICH INS., in support of a false and fraudulent
23 claim, and did aid and abet, solicit, and conspire with another
24 to do the same. (TIN: 26-078546)

22 COUNT 89: On or about and between June 16, 2010 and May 03,
23 2013, in violation of Section 550(a)(6) of the Penal Code
24 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
25 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
26 with the intent to defraud, did knowingly and unlawfully make
27 and cause to be made a false and fraudulent claim to ZURICH INS.
28 for payment of a 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. (TIN: 33-0565809) TO WIT:
3D IMAGING / MRI

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1 COUNT 90: On or about and between July 15, 2011 and December
2 16, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
5 INC., with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to ZURICH
7 INS. for payment of a health care benefit in an amount exceeding
8 nine hundred fifty dollars (\$950), and did aid and abet,
9 solicit, and conspire with another to do the same.(TIN:
10 27-3236269) TO WIT: 3D IMAGING / MRI

8 COUNT 91: On or about and between October 11, 2010 and August
9 24, 2012, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
12 defraud, did knowingly and unlawfully make and cause to be made
13 a false and fraudulent claim to ZURICH INS. for payment of a
14 health care benefit in an amount exceeding nine hundred fifty
15 dollars (\$950), and did aid and abet, solicit, and conspire with
16 another to do the same.(TIN: 20-8804326)

15 COUNT 92: On or about and between December 29, 2007 and
16 December 02, 2013, in violation of Section 550(a)(6) of the
17 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
18 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
19 and THOMAS HERIC, with the intent to defraud, did knowingly and
20 unlawfully make and cause to be made a false and fraudulent
21 claim to STATE FUND for payment of a health care benefit in an
22 amount exceeding nine hundred fifty dollars (\$950), and did aid
23 and abet, solicit, and conspire with another to do the same.
24 (TIN: 26-0778546)

22 COUNT 93: On or about and between December 29, 2007 and
23 December 02, 2013, in violation of Section 550(a)(5) of the
24 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM
25 CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL
26 CENTER, INC. and THOMAS HERIC, with the intent to defraud, did
27 knowingly and unlawfully prepare, make, and subscribe a material
28 writing, with the intent to present and use it, and to allow it
to be presented to STATE FUND, in support of a false and
fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same.(TIN: 26-0778546)

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1 COUNT 94: On or about and between September 10, 2012 and
2 October 30, 2013, in violation of Section 550(a)(6) of the Penal
3 Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN
4 and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
5 INC., with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to STATE
7 FUND for payment of a health care benefit in an amount exceeding
8 nine hundred fifty dollars (\$950), and did aid and abet,
9 solicit, and conspire with another to do the same.(TIN:
10 27-2677504)

8 COUNT 95: On or about and between July 18, 2005 and January 08,
9 2010, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
12 with the intent to defraud, did knowingly and unlawfully make
13 and cause to be made a false and fraudulent claim to STATE FUND
14 for payment of a health care benefit in an amount exceeding nine
15 hundred fifty dollars (\$950), and did aid and abet, solicit, and
16 conspire with another to do the same.(TIN: 33-0565809) TO WIT:
17 NERVE TEST

15 COUNT 96: On or about and between May 11, 2006 and December 09,
16 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
19 with the intent to defraud, did knowingly and unlawfully make
20 and cause to be made a false and fraudulent claim to STATE FUND
21 for payment of a health care benefit in an amount exceeding nine
22 hundred fifty dollars (\$950), and did aid and abet, solicit, and
23 conspire with another to do the same. (TIN: 33-0565809) TO WIT:
24 3D IMAGING / MRI

23 COUNT 97: On or about and between April 13, 2012 and October
24 07, 2013, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
27 INC., with the intent to defraud, did knowingly and unlawfully
28 make and cause to be made a false and fraudulent claim to STATE
FUND for payment of a 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.(TIN:
27-3236269) TO WIT: 3D IMAGING / MRI

1 COUNT 98: On or about and between July 05, 2008 and December
2 03, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to STATE FUND for payment of a
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. (TIN: 20-8804326)

7
8 COUNT 99: On or about and between May 18, 2008 and April 21,
9 2010, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
12 HERIC, with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to CHUBB
14 INSURANCE GROUP for payment of a 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.
(TIN: 26-0778546)

15 COUNT 100: On or about and between May 18, 2008 and April 21,
16 2010, in violation of Section 550(a)(5) of the Penal Code
17 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
18 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
19 and THOMAS HERIC, with the intent to defraud, did knowingly and
20 unlawfully prepare, make, and subscribe a material writing, with
21 the intent to present and use it, and to allow it to be
presented to CHUBB INSURANCE GROUP, in support of a false and
fraudulent claim, and did aid and abet, solicit, and conspire
with another to do the same. (TIN: 26-0778546)

22 COUNT 101: On or about and between September 02, 2005 and
23 February 01, 2011, in violation of Section 550(a)(6) of the
24 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
25 HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL
26 GROUP, INC., with the intent to defraud, did knowingly and
27 unlawfully make and cause to be made a false and fraudulent
28 claim to CHUBB INSURANCE GROUP for payment of a 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. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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1 COUNT 102: On or about and between August 21, 2007 and March
2 17, 2010, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to CHUBB INSURANCE GROUP for
7 payment of a health care benefit in an amount exceeding nine
8 hundred fifty dollars (\$950), and did aid and abet, solicit, and
9 conspire with another to do the same. (TIN: 20-8804326)

10 COUNT 103: On or about and between April 22, 2011 and March 13,
11 2012, in violation of Section 550(a)(6) of the Penal Code
12 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
13 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
14 HERIC, with the intent to defraud, did knowingly and unlawfully
15 make and cause to be made a false and fraudulent claim to ICW
16 GROUP for payment of a health care benefit in an amount
17 exceeding nine hundred fifty dollars (\$950), and did aid and
18 abet, solicit, and conspire with another to do the same. (TIN:
19 26-0778546)

20 COUNT 104: On or about and between April 22, 2011 and March 13,
21 2012, in violation of Section 550(a)(5) of the Penal Code
22 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
23 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
24 and THOMAS HERIC, with the intent to defraud, did knowingly and
25 unlawfully prepare, make, and subscribe a material writing, with
26 the intent to present and use it, and to allow it to be
27 presented to ICW GROUP, in support of a false and fraudulent
28 claim, and did aid and abet, solicit, and conspire with another
to do the same. (TIN: 26-0778546)

COUNT 105: On or about and between October 01, 2012 and October
08, 2013, in violation of Section 550(a)(6) of the Penal Code
(MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
INC., with the intent to defraud, did knowingly and unlawfully
make and cause to be made a false and fraudulent claim to ICW
GROUP for payment of a 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. (TIN:
27-2677504)

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1 COUNT 106: On or about and between May 01, 2013 and September
2 21, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
5 INC., with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to ICW
7 GROUP for payment of a health care benefit in an amount
8 exceeding nine hundred fifty dollars (\$950), and did aid and
9 abet, solicit, and conspire with another to do the same. (TIN:
10 27-3236269) TO WIT: 3D IMAGING / MRI

11 COUNT 107: On or about and between January 05, 2011 and May 17,
12 2011, in violation of Section 550(a)(6) of the Penal Code
13 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
14 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
15 with the intent to defraud, did knowingly and unlawfully make
16 and cause to be made a false and fraudulent claim to ICW GROUP
17 for payment of a health care benefit in an amount exceeding nine
18 hundred fifty dollars (\$950), and did aid and abet, solicit, and
19 conspire with another to do the same. (TIN: 33-0565809) TO WIT:
20 3D IMAGING / MRI

21 COUNT 108: On or about and between April 22, 2011 and December
22 14, 2012, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
25 defraud, did knowingly and unlawfully make and cause to be made
26 a false and fraudulent claim to ICW GROUP for payment of a
27 health care benefit in an amount exceeding nine hundred fifty
28 dollars (\$950), and did aid and abet, solicit, and conspire with
another to do the same. (TIN: 20-8804326)

29 COUNT 109: On or about and between February 28, 2008 and
30 October 02, 2012, in violation of Section 550(a)(6) of the Penal
31 Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN
32 and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP,
33 INC., with the intent to defraud, did knowingly and unlawfully
34 make and cause to be made a false and fraudulent claim to
35 COMPWEST INS. CO. for payment of a health care benefit in an
36 amount exceeding nine hundred fifty dollars (\$950), and did aid
37 and abet, solicit, and conspire with another to do the same.
38 (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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1 COUNT 110: On or about and between March 10, 2008 and August
2 01, 2010, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
5 HERIC, with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to
7 COMPWEST INS. CO. for payment of a health care benefit in an
8 amount exceeding nine hundred fifty dollars (\$950), and did aid
9 and abet, solicit, and conspire with another to do the same.
10 (TIN: 26-0778546)

11 COUNT 111: On or about and between March 10, 2008 and August
12 01, 2010, in violation of Section 550(a)(5) of the Penal Code
13 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
14 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
15 and THOMAS HERIC, with the intent to defraud, did knowingly and
16 unlawfully prepare, make, and subscribe a material writing, with
17 the intent to present and use it, and to allow it to be
18 presented to COMPWEST INS. CO., in support of a false and
19 fraudulent claim, and did aid and abet, solicit, and conspire
20 with another to do the same. (TIN: 26-0778546)

21 COUNT 112: On or about and between March 13, 2012 and January
22 18, 2013, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
25 defraud, did knowingly and unlawfully make and cause to be made
26 a false and fraudulent claim to COMPWEST INS. CO. for payment of
27 a health care benefit in an amount exceeding nine hundred fifty
28 dollars (\$950), and did aid and abet, solicit, and conspire with
another to do the same. (TIN: 20-8804326)

29 COUNT 113: On or about and between July 12, 2011 and October
30 01, 2013, in violation of Section 550(a)(6) of the Penal Code
31 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
32 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
33 INC., with the intent to defraud, did knowingly and unlawfully
34 make and cause to be made a false and fraudulent claim to
35 COMPWEST INS. CO. for payment of a health care benefit in an
36 amount exceeding nine hundred fifty dollars (\$950), and did aid
37 and abet, solicit, and conspire with another to do the same.
38 (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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1 COUNT 114: On or about December 13, 2010, in violation of
2 Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a
3 FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING
4 MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to SAFEWAY for payment of a 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.(TIN: 26-0778546)

7
8 COUNT 115: On or about December 13, 2010, in violation of
9 Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN
10 CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER
11 SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent
12 to defraud, did knowingly and unlawfully prepare, make, and
13 subscribe a material writing, with the intent to present and use
it, and to allow it to be presented to SAFEWAY, in support of a
false and fraudulent claim, and did aid and abet, solicit, and
conspire with another to do the same.(TIN: 26-0778546)

14 COUNT 116: On or about December 20, 2013, in violation of
15 Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a
16 FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN
17 CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to
18 defraud, did knowingly and unlawfully make and cause to be made
19 a false and fraudulent claim to SAFEWAY for payment of a health
20 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.(TIN: 27-2677504)

21 COUNT 117: On or about and between December 21, 2004 and May
22 29, 2013, in violation of Section 550(a)(6) of the Penal Code
23 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
24 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
25 with the intent to defraud, did knowingly and unlawfully make
26 and cause to be made a false and fraudulent claim to SAFEWAY AND
27 ACIG for payment of a 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.(TIN:
33-0565809) TO WIT: 3D IMAGING / MRI

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1 COUNT 118: On or about December 30, 2013, in violation of
2 Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a
3 FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN
4 CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to SAFEWAY for payment of a 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. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

7
8 COUNT 119: On or about April 30, 2012, in violation of Section
9 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY,
10 SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT,
11 INC., with the intent to defraud, did knowingly and unlawfully
12 make and cause to be made a false and fraudulent claim to
13 SAFEWAY for payment of a 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. (TIN:
20-8804326)

14 COUNT 120: On or about and between July 18, 2005 and November
15 26, 2013, in violation of Section 550(a)(6) of the Penal Code
16 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
17 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
18 with the intent to defraud, did knowingly and unlawfully make
19 and cause to be made a false and fraudulent claim to PACIFIC
20 COMPENSATION INSURANCE COMPANY for payment of a 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. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

21 COUNT 121: On or about and between October 04, 2006 and
22 September 13, 2013, in violation of Section 550(a)(6) of the
23 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
24 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
25 and THOMAS HERIC, with the intent to defraud, did knowingly and
26 unlawfully make and cause to be made a false and fraudulent
27 claim to PACIFIC COMPENSATION INSURANCE COMPANY for payment of a
28 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. (TIN: 26-0778546)

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1 COUNT 122: On or about and between October 04, 2006 and
2 September 13, 2013, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM
4 CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL
5 CENTER, INC. and THOMAS HERIC, with the intent to defraud, did
6 knowingly and unlawfully prepare, make, and subscribe a material
7 writing, with the intent to present and use it, and to allow it
8 to be presented to PACIFIC COMPENSATION INSURANCE COMPANY, in
9 support of a false and fraudulent claim, and did aid and abet,
10 solicit, and conspire with another to do the same.(TIN:
11 26-0778546)

9 COUNT 123: On or about and between February 22, 2007 and
10 September 20, 2011, in violation of Section 550(a)(6) of the
11 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
12 HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with
13 the intent to defraud, did knowingly and unlawfully make and
14 cause to be made a false and fraudulent claim to PACIFIC
15 COMPENSATION INSURANCE COMPANY for payment of a health care
16 benefit in an amount exceeding nine hundred fifty dollars
17 (\$950), and did aid and abet, solicit, and conspire with another
18 to do the same.(TIN: 20-8804326)

16 COUNT 124: On or about and between August 10, 2011 and
17 September 05, 2013, in violation of Section 550(a)(6) of the
18 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
19 HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS
20 GROUP, INC., with the intent to defraud, did knowingly and
21 unlawfully make and cause to be made a false and fraudulent
22 claim to PACIFIC COMPENSATION INSURANCE COMPANY for payment of a
23 health care benefit in an amount exceeding nine hundred fifty
24 dollars (\$950), and did aid and abet, solicit, and conspire with
25 another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING /
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1 COUNT 125: On or about and between October 15, 2010 and July
2 29, 2011, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
5 HERIC, with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to
7 GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD
8 REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit
9 in an amount exceeding nine hundred fifty dollars (\$950), and
10 did aid and abet, solicit, and conspire with another to do the
11 same. (TIN: 26-0778546)

9 COUNT 126: On or about and between October 15, 2010 and July
10 29, 2011, in violation of Section 550(a)(5) of the Penal Code
11 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
12 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
13 and THOMAS HERIC, with the intent to defraud, did knowingly and
14 unlawfully prepare, make, and subscribe a material writing, with
15 the intent to present and use it, and to allow it to be
16 presented to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH,
17 EVEREST, OLD REPUBLIC, SPARTA AND USF&G., in support of a false
18 and fraudulent claim, and did aid and abet, solicit, and
19 conspire with another to do the same. (TIN: 26-0778546)

17 COUNT 127: On or about and between May 04, 2012 and November
18 02, 2013, in violation of Section 550(a)(6) of the Penal Code
19 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
20 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
21 INC., with the intent to defraud, did knowingly and unlawfully
22 make and cause to be made a false and fraudulent claim to
23 GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD
24 REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit
25 in an amount exceeding nine hundred fifty dollars (\$950), and
26 did aid and abet, solicit, and conspire with another to do the
27 same. (TIN: 27-2677504)

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1 COUNT 128: On or about and between December 23, 2010 and
2 December 27, 2012, in violation of Section 550(a)(6) of the
3 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL
5 GROUP, INC., with the intent to defraud, did knowingly and
6 unlawfully make and cause to be made a false and fraudulent
7 claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST,
8 OLD REPUBLIC, SPARTA AND USF&G. for payment of a 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. (TIN: 33-0565809) TO WIT: NERVE TEST

9 COUNT 129: On or about and between March 02, 2011 and July 22,
10 2013, in violation of Section 550(a)(6) of the Penal Code
11 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
12 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
13 with the intent to defraud, did knowingly and unlawfully make
14 and cause to be made a false and fraudulent claim to GALLAGHER
15 BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA
16 AND USF&G. for payment of a 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. (TIN:
33-0565809) TO WIT: 3D IMAGING / MRI

17 COUNT 130: On or about and between January 19, 2012 and
18 December 16, 2013, in violation of Section 550(a)(6) of the
19 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
20 HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS
21 GROUP, INC., with the intent to defraud, did knowingly and
22 unlawfully make and cause to be made a false and fraudulent
23 claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST,
24 OLD REPUBLIC, SPARTA AND USF&G. for payment of a 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. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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1 COUNT 131: On or about and between July 05, 2011 and August 15,
2 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to GALLAGHER BASSETT / ACE, ACIS,
7 ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G. for
8 payment of a health care benefit in an amount exceeding nine
9 hundred fifty dollars (\$950), and did aid and abet, solicit, and
10 conspire with another to do the same.(TIN: 20-8804326)

11
12 COUNT 132: On or about and between September 28, 2012 and
13 October 03, 2013, in violation of Section 550(a)(6) of the Penal
14 Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN
15 and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
16 INC., with the intent to defraud, did knowingly and unlawfully
17 make and cause to be made a false and fraudulent claim to
18 FIREMANS' FUND for payment of a health care benefit in an amount
19 exceeding nine hundred fifty dollars (\$950), and did aid and
20 abet, solicit, and conspire with another to do the same.(TIN:
21 27-3236269) TO WIT: 3D IMAGING / MRI

22
23 COUNT 133: On or about and between September 02, 2009 and
24 December 30, 2013, in violation of Section 550(a)(6) of the
25 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
26 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
27 and THOMAS HERIC, with the intent to defraud, did knowingly and
28 unlawfully make and cause to be made a false and fraudulent
claim to FARMERS INSURANCE COMPANY for payment of a 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.(TIN: 26-0778546)

29
30 COUNT 134: On or about and between September 02, 2009 and
31 December 30, 2013, in violation of Section 550(a)(5) of the
32 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM
33 CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL
34 CENTER, INC. and THOMAS HERIC, with the intent to defraud, did
35 knowingly and unlawfully prepare, make, and subscribe a material
36 writing, with the intent to present and use it, and to allow it
37 to be presented to FARMERS INSURANCE GROUP, in support of a
38 false and fraudulent claim, and did aid and abet, solicit, and
conspire with another to do the same.(TIN: 26-0778546)

1 COUNT 135: On or about and between December 05, 2012 and
2 October 07, 2013, in violation of Section 550(a)(6) of the Penal
3 Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN
4 and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
5 INC., with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to
7 FARMERS INSURANCE COMPANY for payment of a health care benefit
8 in an amount exceeding nine hundred fifty dollars (\$950), and
9 did aid and abet, solicit, and conspire with another to do the
10 same. (TIN: 27-2677504)

8 COUNT 136: On or about and between February 21, 2005 and
9 October 16, 2013, in violation of Section 550(a)(6) of the Penal
10 Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN
11 and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to
14 FARMERS INSURANCE COMPANY for payment of a health care benefit
15 in an amount exceeding nine hundred fifty dollars (\$950), and
16 did aid and abet, solicit, and conspire with another to do the
17 same. (TIN: 33-0565809) TO WIT: NERVE TEST

15 COUNT 137: On or about and between December 30, 2009 and May
16 13, 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
19 with the intent to defraud, did knowingly and unlawfully make
20 and cause to be made a false and fraudulent claim to FARMERS
21 INSURANCE COMPANY for payment of a health care benefit in an
22 amount exceeding nine hundred fifty dollars (\$950), and did aid
23 and abet, solicit, and conspire with another to do the same.
24 (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

23 COUNT 138: On or about and between November 03, 2011 and
24 November 07, 2013, in violation of Section 550(a)(6) of the
25 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
26 HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS
27 GROUP, INC., with the intent to defraud, did knowingly and
28 unlawfully make and cause to be made a false and fraudulent
claim to FARMERS INSURANCE COMPANY for payment of a 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. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

1 COUNT 139: On or about and between April 22, 2010 and October
2 10, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to FARMERS INSURANCE COMPANY for
7 payment of a health care benefit in an amount exceeding nine
8 hundred fifty dollars (\$950), and did aid and abet, solicit, and
9 conspire with another to do the same.(TIN: 20-8804326)

10 COUNT 140: On or about and between August 10, 2009 and
11 September 14, 2011, in violation of Section 550(a)(6) of the
12 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
13 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
14 and THOMAS HERIC, with the intent to defraud, did knowingly and
15 unlawfully make and cause to be made a false and fraudulent
16 claim to EMPLOYERS INSURANCE GROUP for payment of a health care
17 benefit in an amount exceeding nine hundred fifty dollars
18 (\$950), and did aid and abet, solicit, and conspire with another
19 to do the same.(TIN: 26-0778546)

20 COUNT 141: On or about and between August 10, 2009 and
21 September 14, 2011, in violation of Section 550(a)(5) of the
22 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM
23 CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL
24 CENTER, INC. and THOMAS HERIC, with the intent to defraud, did
25 knowingly and unlawfully prepare, make, and subscribe a material
26 writing, with the intent to present and use it, and to allow it
27 to be presented to EMPLOYERS INSURANCE GROUP, in support of a
28 false and fraudulent claim, and did aid and abet, solicit, and
conspire with another to do the same.(TIN: 26-0778546)

COUNT 142: On or about and between April 24, 2012 and November
13, 2013, in violation of Section 550(a)(6) of the Penal Code
(MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
INC., with the intent to defraud, did knowingly and unlawfully
make and cause to be made a false and fraudulent claim to
EMPLOYERS INSURANCE GROUP for payment of a 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.(TIN: 27-2677504)

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1 COUNT 143: On or about and between March 02, 2010 and February
2 14, 2012, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
5 with the intent to defraud, did knowingly and unlawfully make
6 and cause to be made a false and fraudulent claim to EMPLOYERS
7 INSURANCE GROUP for payment of a health care benefit in an
8 amount exceeding nine hundred fifty dollars (\$950), and did aid
9 and abet, solicit, and conspire with another to do the same.
10 (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

11 COUNT 144: On or about and between June 28, 2012 and November
12 06, 2013, in violation of Section 550(a)(6) of the Penal Code
13 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
14 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
15 INC., with the intent to defraud, did knowingly and unlawfully
16 make and cause to be made a false and fraudulent claim to
17 EMPLOYERS INSURANCE GROUP for payment of a health care benefit
18 in an amount exceeding nine hundred fifty dollars (\$950), and
19 did aid and abet, solicit, and conspire with another to do the
20 same. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

21 COUNT 145: On or about and between December 27, 2007 and
22 November 01, 2013, in violation of Section 550(a)(6) of the
23 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
24 HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with
25 the intent to defraud, did knowingly and unlawfully make and
26 cause to be made a false and fraudulent claim to EMPLOYERS
27 INSURANCE GROUP for payment of a health care benefit in an
28 amount exceeding nine hundred fifty dollars (\$950), and did aid
and abet, solicit, and conspire with another to do the same.
(TIN: 20-8804326)

29 COUNT 146: On or about and between December 11, 2009 and August
30 20, 2012, in violation of Section 550(a)(6) of the Penal Code
31 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
32 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
33 HERIC, with the intent to defraud, did knowingly and unlawfully
34 make and cause to be made a false and fraudulent claim to
35 AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit
36 in an amount exceeding nine hundred fifty dollars (\$950), and
37 did aid and abet, solicit, and conspire with another to do the
38 same. (TIN: 26-0778546)

1 COUNT 147: On or about and between December 11, 2009 and August
2 20, 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 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. (TIN: 26-0778546)

8 COUNT 148: On or about and between December 11, 2012 and
9 November 11, 2013, in violation of Section 550(a)(6) of the
10 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE
11 HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS
12 GROUP, INC., with the intent to defraud, did knowingly and
13 unlawfully make and cause to be made a false and fraudulent
14 claim to AMERICAN CLAIMS MANAGEMENT for payment of a 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. (27-2677504)

15 COUNT 149: On or about and between November 08, 2005 and April
16 03, 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
19 with the intent to defraud, did knowingly and unlawfully make
20 and cause to be made a false and fraudulent claim to AMERICAN
21 CLAIMS MANAGEMENT for payment of a health care benefit in an
22 amount exceeding nine hundred fifty dollars (\$950), and did aid
and abet, solicit, and conspire with another to do the same.
(TIN: 33-0565809) TO WIT: NERVE TEST

23 COUNT 150: On or about and between June 05, 2009 and July 26,
24 2013, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
27 with the intent to defraud, did knowingly and unlawfully make
28 and cause to be made a false and fraudulent claim to AMERICAN
CLAIMS MANAGEMENT for payment of a 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.
(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

1 COUNT 151: On or about and between July 13, 2011 and December
2 02, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
5 INC., with the intent to defraud, did knowingly and unlawfully
6 make and cause to be made a false and fraudulent claim to
7 AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit
8 in an amount exceeding nine hundred fifty dollars (\$950), and
9 did aid and abet, solicit, and conspire with another to do the
10 same. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

8 COUNT 152: On or about and between December 11, 2009 and
9 October 09, 2013, in violation of Section 550(a)(6) of the Penal
10 Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN
11 and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent
12 to defraud, did knowingly and unlawfully make and cause to be
13 made a false and fraudulent claim to AMERICAN CLAIMS MANAGEMENT
14 for payment of a health care benefit in an amount exceeding nine
15 hundred fifty dollars (\$950), and did aid and abet, solicit, and
16 conspire with another to do the same. (TIN:20-8804326)

15 COUNT 153: On or about and between September 14, 2009 and July
16 01, 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his companies: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.
19 and SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with
20 the intent to defraud, did knowingly and unlawfully make and
21 cause to be made a false and fraudulent claim to CHURCH MUTUAL
22 INSURANCE COMPANY for payment of a health care benefit in an
23 amount exceeding nine hundred fifty dollars (\$950), and did aid
24 and abet, solicit, and conspire with another to do the same.
25 (TIN: 33-0565809) (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

23 COUNT 154: On or about and between October 29, 2010 and August
24 01, 2011, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS
27 HERIC, with the intent to defraud, did knowingly and unlawfully
28 make and cause to be made a false and fraudulent claim to
LIBERTY MUTUAL for payment of a 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.
(TIN:26-0778546)

1 COUNT 155: On or about and between October 29, 2010 and August
2 01, 2011, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE
4 HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC.
5 and THOMAS HERIC, with the intent to defraud, did knowingly and
6 unlawfully prepare, make, and subscribe a material writing, with
7 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. (TIN: 26-0778546)

8 COUNT 156: On or about and between May 10, 2012 and October 31,
9 2013, in violation of Section 550(a)(6) of the Penal Code
10 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
11 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
12 INC., with the intent to defraud, did knowingly and unlawfully
13 make and cause to be made a false and fraudulent claim to
14 LIBERTY MUTUAL for payment of a 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. (TIN:
27-2677504)

15 COUNT 157: On or about and between June 01, 2010 and July 17,
16 2013, in violation of Section 550(a)(6) of the Penal Code
17 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
18 his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC.,
19 with the intent to defraud, did knowingly and unlawfully make
20 and cause to be made a false and fraudulent claim to LIBERTY
21 MUTUAL for payment of a 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. (TIN:
33-0565809) TO WIT: 3D IMAGING / MRI

22
23 COUNT 158: On or about and between July 14, 2011 and September
24 13, 2011, in violation of Section 550(a)(6) of the Penal Code
25 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
26 his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP,
27 INC., with the intent to defraud, did knowingly and unlawfully
28 make and cause to be made a false and fraudulent claim to
LIBERTY MUTUAL for payment of a 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. (TIN:
27-3236269) TO WIT: 3D IMAGING / MRI

1 COUNT 159: On or about and between September 08, 2011 and April
2 29, 2013, in violation of Section 550(a)(6) of the Penal Code
3 (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and
4 his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to
5 defraud, did knowingly and unlawfully make and cause to be made
6 a false and fraudulent claim to LIBERTY MUTUAL for payment of a
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.(TIN: 20-8804326)

7
8 ENHANCEMENT(S)

9 It is further alleged pursuant to Penal Code section 186.11(a)
10 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
11 to counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16,
12 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32,
13 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48,
14 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64,
15 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80,
16 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96,
17 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109,
18 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122,
19 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135,
20 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148,
21 149, 150, 151, 152, 153, 154, 155, 156, 157, 158 and 159,
defendants SIM CARLISLE HOFFMAN, BETTER SLEEPING MEDICAL CENTER.
INC., ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, SOUTHERN
CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., PACIFIC SLEEP
MEDICAL GROUP, INC., ADVANCED MEDICAL SUPPORT, INC. and THOMAS
MICHAEL HERIC MD engaged in a pattern of related fraudulent
felony conduct involving the taking of more than five hundred
thousand dollars (\$500,000).

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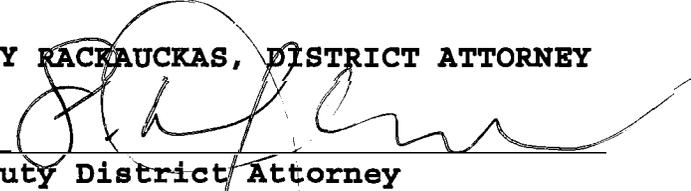
1 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,
2 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30,
3 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46,
4 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62,
5 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78,
6 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94,
7 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108,
8 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121,
9 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134,
10 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147,
11 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158 and 159,

12 it is further alleged pursuant to Penal Code section 12022.6(a)
13 (4) (PROPERTY DAMAGE OVER \$3,200,000), that SIM CARLISLE
14 HOFFMAN, BETTER SLEEPING MEDICAL CENTER. INC., ADVANCED
15 PROFESSIONAL IMAGING MEDICAL GROUP, SOUTHERN CALIFORNIA MEDICAL
16 DIAGNOSTICS GROUP, INC., PACIFIC SLEEP MEDICAL GROUP, INC.,
17 ADVANCED MEDICAL SUPPORT, INC. and THOMAS MICHAEL HERIC MD
18 intentionally took, damaged, and destroyed property valued in
19 excess of three million two hundred thousand dollars
20 (\$3,200,000) during the commission and attempted commission of
21 the above offense.

22 I declare under penalty of perjury, on information and belief,
23 that the foregoing is true and correct.

24 Dated 01-27-2014 at Orange County, California.
25 KS/AR 14F09001

26 TONY RACKAUCKAS, DISTRICT ATTORNEY

27 by: 
28 Deputy District Attorney

29 RESTITUTION CLAIMED
30 [] None
31 [] \$ _____
32 [X] To be determined

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PROP36/PC1000 ELIGIBILITY:

SIM CARLISLE HOFFMAN - Prop36 INELIGIBLE/PC1000 INELIGIBLE
BETTER SLEEPING MEDICAL CENTER. INC. - N/A / N/A
ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP - N/A / N/A
SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC. - N/A / N/A
PACIFIC SLEEP MEDICAL GROUP, INC. - N/A / N/A
ADVANCED MEDICAL SUPPORT, INC. - N/A / N/A
THOMAS MICHAEL HERIC MD - Prop36 INELIGIBLE/PC1000 INELIGIBLE

BAIL RECOMMENDATION:

SIM CARLISLE HOFFMAN - \$ 20,000,000.00
THOMAS MICHAEL HERIC MD - \$ 100,000.00

NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.

State of California
Secretary of State



E-502486

FILED

STATEMENT OF INFORMATION
(Domestic Stock and Agricultural Cooperative Corporations)

In the office of the Secretary of
State of the State of California

Jan - 7 2008

This Space For Filing Use Only

FEES (Filing and Disclosure): \$25.00. If amendment, see instructions.
IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. CORPORATE NAME (Please do not alter if name is preprinted.)
C2424479
ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., A PROFESSIONAL CORPORATION
6800 LINCOLN AVENUE, SUITE 100
BUENA PARK CA 90620-4163

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DUE DATE:

COMPLETE ADDRESSES FOR THE FOLLOWING (Do not abbreviate the name of the city. Items 2 and 3 cannot be P.O. Boxes.)

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
6800 LINCOLN AVENUE, SUITE 100 BUENA PARK CA 90620-4163			
3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
6800 LINCOLN AVENUE, SUITE 100 BUENA PARK CA 90620-4163			
4. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 2	CITY	STATE	ZIP CODE
6800 LINCOLN AVENUE, SUITE 100 BUENA PARK CA 90620-4163			

NAMES AND COMPLETE ADDRESSES OF THE FOLLOWING OFFICERS (The corporation must have these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

5. CHIEF EXECUTIVE OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
SIM C HOFFMAN	6800 LINCOLN AVENUE, SUITE 100	BUENA PARK, CA		90620-4163
6. SECRETARY/	ADDRESS	CITY	STATE	ZIP CODE
SIM C HOFFMAN	6800 LINCOLN AVENUE, SUITE 100	BUENA PARK, CA		90620-4163
7. CHIEF FINANCIAL OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
SIM C HOFFMAN	6800 LINCOLN AVENUE, SUITE 100	BUENA PARK CA		90620-4163

NAMES AND COMPLETE ADDRESSES OF ALL DIRECTORS, INCLUDING DIRECTORS WHO ARE ALSO OFFICERS (The corporation must have at least one director. Attach additional pages, if necessary.)

8. NAME	ADDRESS	CITY	STATE	ZIP CODE
SIM C HOFFMAN	6800 LINCOLN AVENUE, SUITE 100	BUENA PARK, CA		90620-4163
9. NAME	ADDRESS	CITY	STATE	ZIP CODE
10. NAME	ADDRESS	CITY	STATE	ZIP CODE

11. NUMBER OF VACANCIES ON THE BOARD OF DIRECTIONS, IF ANY:

AGENT FOR SERVICE OF PROCESS (If the agent is an individual, the agent must reside in California and Item 13 must be completed with a California street address (a P.O.Box address is not acceptable). If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 13 must be left blank.)

12. NAME OF AGENT FOR SERVICE OF PROCESS
SIM C HOFFMAN

13. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE
6800 LINCOLN AVENUE, SUITE 100 BUENA PARK, CA 90620-4163

TYPE OF BUSINESS

14. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
DIAGNOSTIC IMAGING

15. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

01/07/2008 MOHAMMAD ALI DORAFSHAR CONSULTANT
DATE TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM TITLE SIGNATURE