

INDEX C & E Technology and Edgar Gonzalez

Exhibit #	Document	File Date
1	Case # 17CF1372: The People of the State of California v. Tania Arguello, Carlos Arguello III, et. al.	6/5/2017
2	Case # 17CF1364 The People of the State of California v. Edgar Gonzalez	6/5/2017
3	Co-conspirators Indictments: 17CF1367 People v. Rony Barsoum; 17CF1368 People v. Dennis Fusi; 17CF1361 People v. Fari Fezai; 17CF1365 People v. John Jansen; 17CF1373 People v. Jon Woods; 17CF1366 People v. Lionel Eduardo Giron; 17CF1363 People v. Payman Zargari; 17CF1362 People v. Robin Rebecca Jacobs; 17CF1369 People v. Robert Irving Slater.	6/5/2017
4	C & E Technology Secretary of State (SOS) Articles of Incorporation	8/20/2010
5	C & E Technology SOS Statement of Information (SI)	8/6/2012
6	C & E Technology SOS SI	4/18/2017
7	C & E Technology SOS Certificate of Dissolution	5/25/2017
8	Case Detail Summaries: 17CF1372 Tania Arguello, et. al. and 17CF1364 Edgar Gonzalez	

EXHIBIT 1

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1372

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 SORAIDA VERONICA CASTRO 06/05/75) OCDA WC12020005
12 B3486071)
13 BORIS MIKHAYOVICH DADIOMOV 01/22/86)
14 D7315517)
15 TANIA ARGUELLO 09/26/85)
16 D3429273)
17 AKA TANIA ARGUELLO PLASCENCIA)
18 TANIA PLASCENCIA)
19 CARLOS ARGUELLO III 04/30/82)
20 B8476333)
21 DULCE GALLEGOS 11/24/86)
22 B6466656)
23 AKA DULCE CAROLINA GALLEGOS)
24)
25 Defendant(s)

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

23 COUNT 1: On or about and between March 01, 2010 and June 02,
24 2017, in violation of Section 182(a)(1) of the Penal Code
25 (CONSPIRACY TO COMMIT A CRIME), a FELONY, SORAIDA VERONICA
26 CASTRO, BORIS MIKHAYOVICH DADIOMOV, TANIA ARGUELLO, CARLOS
27 ARGUELLO III and DULCE GALLEGOS did unlawfully conspire together
28 and with another person, whose identity is unknown, to commit
of Section 3215 of the Labor Code.

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1 It is further alleged that pursuant to and for the purpose of
2 carrying out the objects and purposes of the conspiracy, one and
3 more of the conspirators committed the following overt acts:

4 OVERT ACT 1

5 Defendant Carlos Arguello III formed Centro Legal Internacional
6 in 2005.

7 OVERT ACT 2

8 On or about March of 2010 Defendant Arguello created an attorney
9 marketing scheme and proceeded to secure contracts with 20 to 40
10 workers' compensation and personal injury attorneys for his
11 marketing services until May of 2017 .

12 OVERT ACT 3

13 Defendant Arguello required all participating attorneys to sign
14 annual contracts for his "joint advertising program," and each
15 contract specified a monthly fee and identified one of Defendant
16 Arguello's companies, which were owned or controlled by him, as
17 the marketing service provider.

18 OVERT ACT 4

19 Defendant Arguello excluded from the written contract certain
20 terms verbally agreed upon by all participating attorneys,
21 including that his joint advertising scheme would procure and
22 deliver to each participating attorney an agreed upon minimum
23 number of retained clients per month.

24 OVERT ACT 5

25 Defendant Arguello excluded from the written contract certain
26 terms verbally agreed upon by all participating attorneys,
27 including that all clients procure and delivered to each
28 participating attorney would be referred to medical providers
chosen by Providence Scheduling.

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OVERT ACT 6

Defendant Arguello excluded from the written contract certain terms verbally agreed upon by all participating attorneys, including that participating attorneys would use copy service companies owned, controlled or affiliated by Defendant Arguello including: C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Defendant Arguello, facilitated agreements between the participating attorneys and his associate Edgar Gonzales who owned, operated and controlled USA Photocopy, a company located in the County of Orange.

OVERT ACT 8

Defendant Arguello, facilitated agreements between the participating attorneys and two copy service companies owned by his sister Defendant Tania Arguello-Plasencia and located in the County of Orange, named C & E Technology and Professional Documents Management.

OVERT ACT 9

Defendant Arguello and his associate Edgar Gonzalez, managed, controlled and directed the day to day operations of C & E Technology and Professional Documents Management.

OVERT ACT 10

Defendant Tania Arguello served as a bookkeeper for Defendant Arguello's companies, and among other managerial responsibilities, handled invoices and payments, monitored contract renewals and tracked attorney payments and marketer commissions.

OVERT ACT 11

Defendant Arguello-Plasencia employed marketers to recruit new attorneys for his lawyer referral scheme and his operations continued until May 31, 2017.

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OVERT ACT 12

Defendant Arguello employed Defendant Boris Dadiomov as a marketer to recruit new attorney clients in exchange for 10-15% of fees collected from his attorney clients.

OVERT ACT 13

Defendant Arguello directed the production, distribution and publication of Spanish-language advertisements promoting access to legal assistance for workers' compensation and personal injury cases through toll-free numbers and/or websites as a means to recruit prospective clients.

OVERT ACT 14

Defendant Arguello employed sub-contractors to distribute his advertisements in predominantly Hispanic neighborhoods, shopping centers and swap meets across California and at the US-Mexico border.

OVERT ACT 15

Defendant Arguello set-up an overseas call center to receive and screen calls from potential clients, and to persuade callers to sign-up with his participating attorneys.

OVERT ACT 16

Defendant Soraida Veronica Castro managed Defendant Arguello's call center, and was responsible for assigning procured cases to participating attorneys according to the order of priority specified by Defendant Arguello.

OVERT ACT 17

Defendant Arguello established procedures for "sign-up agents" to visit clients procured by call center operators within 48 hours of procurement, and to have "sign-up agent" complete and obtain signatures of clients on intake packets, blank legal documents and attorney retainer agreement prior to any contact with the participating attorney.

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OVERT ACT 18

Defendant Arguello directed the creation of HQ Sign Up, ACCU Sign Up and TM Sign Up--businesses that provided legal "sign-up" services exclusively for his marketing scheme.

OVERT ACT 19

Defendant Arguello directed production of misleading web sites offering legal services, including iwantmylawyernow.com, instantlawyeraccess.com, centrodeabogadosinternacional.com, uniondeabogadoslatinos.com, and unitedinjuryattorneys.com, each offering "free consultation" via an online consultation form or a toll-free number, and paid for search engine optimization and digital marketing services to direct traffic to those websites.

OVERT ACT 20

Defendant Arguello connected toll-free numbers listed on the websites to his call center and also forwarded submission of all online consultation forms to his call center staff to contact prospective clients.

OVERT ACT 21

Defendant Arguello directed all the activities of Centro de Abogados Internacional Advertising, Inc. which was formed in 2016, even though the company was owned by Defendant Dulce Gallegos, who served as Defendant Arguello's assistant and employee.

OVERT ACT 22

From 2015 to April 2017, Defendant Arguello offered and paid digital marketers \$300 for each client procured and successfully signed-up with a participating attorney through instantlawyeraccess.com.

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OVERT ACT 23

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2 Between March 1, 2011 and June 1, 2017, USA Photocopy,
3 Professional Documents Management and C&E Technology filed in
4 access of one million dollars in liens with the Workers'
5 Compensation Appeals Board, seeking payment from at least 40
6 different workers' compensation insurance carriers for copy
7 services provided to attorneys participating in Defendant
8 Arguello's marketing scheme.

9
10 COUNT 2: On or about and between June 04, 2013 and June 01,
11 2017, in violation of Section 550(b)(3) of the Penal Code
12 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
13 intent to defraud, did unlawfully conceal and knowingly fail to
14 disclose, and did knowingly assist with another person to
15 conceal and fail to disclose the occurrence of an event and a
16 fact that affected the initial and continued material right and
17 entitlement of medical providers affiliated with Defendant's
18 companies including Providence Scheduling to an insurance
19 benefit and payment, and to the amount of a benefit and payment
20 to which medical providers affiliated with Defendant's companies
21 including Providence Scheduling was entitled, namely: violation
22 of Labor Code 139.32 (c) in connection with referral of
23 attorney Fari Rezai's clients to medical providers associated
24 with Defendant Arguello's companies.

25
26 COUNT 3: On or about and between June 04, 2013 and June 01,
27 2017, in violation of Section 550(b)(3) of the Penal Code
28 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
intent to defraud, did unlawfully conceal and knowingly fail to
disclose, and did knowingly assist with another person to
conceal and fail to disclose the occurrence of an event and a
fact that affected the initial and continued material right and
entitlement of USA Photocopy, C & E Technology, and Professional
Documents Management to an insurance benefit and payment, and to
the amount of a benefit and payment to which USA Photocopy, C &
E Technology, and Professional Documents Management was
entitled, namely: violation of Labor Code 139.32 (c) in
connection with copy services rendered for attorney Fari Rezai's
workers' compensation cases by companies owned or associated
with Defendant Arguello.

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1 COUNT 4: On or about and between June 04, 2013 and June 01,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of medical providers affiliated with Defendant's
9 companies including Providence Scheduling to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which medical providers affiliated with Defendant's companies
12 including Providence Scheduling was entitled, namely: violation
13 of Labor Code 139.32 (c) in connection with referral of
14 attorney Jon Woods's clients to medical providers associated
15 with Defendant Arguello's companies.

11 COUNT 5: On or about and between June 04, 2013 and June 01,
12 2017, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C & E Technology, and Professional
19 Documents Management to an insurance benefit and payment, and to
20 the amount of a benefit and payment to which USA Photocopy, C &
21 E Technology, and Professional Documents Management was
22 entitled, namely: violation of Labor Code 139.32 (c) in
23 connection with copy services rendered for attorney Jon Woods'
24 workers' compensation cases by companies owned or associated
25 with Defendant Arguello.

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1 COUNT 6: On or about and between June 04, 2013 and November 01,
2 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of medical providers affiliated with Defendant's
9 companies including Providence Scheduling to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which medical providers affiliated with Defendant's companies
12 including Providence Scheduling was entitled, namely: violation
13 of Labor Code 139.32 (c) in connection with referral of
14 attorney Lionel Giron's clients to medical providers associated
15 with Defendant Arguello's companies.

11 COUNT 7: On or about and between June 04, 2013 and June 01,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C & E Technology, and Professional
19 Documents Management to an insurance benefit and payment, and to
20 the amount of a benefit and payment to which USA Photocopy, C &
21 E Technology, and Professional Documents Management was
22 entitled, namely: violation of Labor Code 139.32 (c) in
23 connection with copy services rendered for attorney Lionel
24 Giron's workers' compensation cases by companies owned or
25 associated with Defendant Arguello.

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1 COUNT 8: On or about and between June 04, 2013 and June 01,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of medical providers affiliated with Defendant's
9 companies including Providence Scheduling to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which medical providers affiliated with Defendant's companies
12 including Providence Scheduling was entitled, namely: violation
13 of Labor Code 139.32 (c) in connection with referral of
14 attorney John Jansen's clients to medical providers associated
15 with Defendant Arguello's companies.

11 COUNT 9: On or about and between June 04, 2013 and June 01,
12 2017, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C & E Technology, and Professional
19 Documents Management to an insurance benefit and payment, and to
20 the amount of a benefit and payment to which USA Photocopy, C &
21 E Technology, and Professional Documents Management was
22 entitled, namely: violation of Labor Code 139.32 (c) in
23 connection with copy services rendered for attorney John
24 Jansen's workers' compensation cases by companies owned or
25 associated with Defendant Arguello.

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1 COUNT 10: On or about and between September 01, 2016 and June
2 01, 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of medical providers affiliated with Defendant's
9 companies including Providence Scheduling to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which medical providers affiliated with Defendant's companies
12 including Providence Scheduling was entitled, namely: violation
13 of Labor Code 139.32 (c) in connection with referral of
14 attorney Dennis Fusi's clients to medical providers associated
15 with Defendant Arguello's companies.

11 COUNT 11: On or about and between September 01, 2016 and June
12 01, 2017, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C & E Technology, and Professional
19 Documents Management to an insurance benefit and payment, and to
20 the amount of a benefit and payment to which USA Photocopy, C &
21 E Technology, and Professional Documents Management was
22 entitled, namely: violation of Labor Code 139.32 (c) in
23 connection with copy services rendered for attorney Dennis
24 Fusi's workers' compensation cases by companies owned or
25 associated with Defendant Arguello.

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1 COUNT 12: On or about June 01, 2013, in violation of Section 550
2 (b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, CARLOS
3 ARGUELLO III, with the intent to defraud, did unlawfully
4 conceal and knowingly fail to disclose, and did knowingly assist
5 with another person to conceal and fail to disclose the
6 occurrence of an event and a fact that affected the initial and
7 continued material right and entitlement of medical providers
8 affiliated with Defendant's companies including Providence
9 Scheduling to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which medical providers
11 affiliated with Defendant's companies including Providence
12 Scheduling was entitled, namely: violation of Labor Code 139.32
13 (c) in connection with referral of attorney Jorge Reyes's
14 clients to medical providers associated with Defendant
15 Arguello's companies.

11 COUNT 13: On or about and between June 01, 2013 and August 01,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C & E Technology, and Professional
19 Documents Management to an insurance benefit and payment, and to
20 the amount of a benefit and payment to which USA Photocopy, C &
21 E Technology, and Professional Documents Management was
22 entitled, namely: violation of Labor Code 139.32 (c) in
23 connection with copy services rendered for attorney Jorge
24 Reyes's workers' compensation cases by companies owned or
25 associated with Defendant Arguello.

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1 COUNT 14: On or about and between June 01, 2013 and April 01,
2 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of medical providers affiliated with Defendant's
9 companies including Providence Scheduling to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which medical providers affiliated with Defendant's companies
12 including Providence Scheduling was entitled, namely: violation
13 of Labor Code 139.32 (c) in connection with referral of
14 attorney Rony Barsoum's clients to medical providers associated
15 with Defendant Arguello's companies.

16 COUNT 15: On or about and between June 01, 2013 and August 01,
17 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of USA Photocopy, C & E Technology, and Professional
24 Documents Management to an insurance benefit and payment, and to
25 the amount of a benefit and payment to which USA Photocopy, C &
26 E Technology, and Professional Documents Management was
27 entitled, namely: violation of Labor Code 139.32 (c) in
28 connection with copy services rendered for attorney Rony
Barsoum's workers' compensation cases by companies owned or
associated with Defendant Arguello.

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1 COUNT 16: On or about and between June 01, 2013 and June 02,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of medical providers affiliated with Defendant's
9 companies including Providence Scheduling to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which medical providers affiliated with Defendant's companies
12 including Providence Scheduling was entitled, namely: violation
13 of Labor Code 139.32 (c) in connection with referral of
14 attorney Payman Zargari's clients to medical providers
15 associated with Defendant Arguello's companies.

11 COUNT 17: On or about and between June 01, 2013 and June 02,
12 2017, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C & E Technology, and Professional
19 Documents Management to an insurance benefit and payment, and to
20 the amount of a benefit and payment to which USA Photocopy, C &
21 E Technology, and Professional Documents Management was
22 entitled, namely: violation of Labor Code 139.32 (c) in
23 connection with copy services rendered for attorney Payman
24 Zargari's workers' compensation cases by companies owned or
25 associated with Defendant Arguello.

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1 COUNT 18: On or about and between June 01, 2013 and March 01,
2 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of medical providers affiliated with Defendant's
9 companies including Providence Scheduling to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which medical providers affiliated with Defendant's companies
12 including Providence Scheduling was entitled, namely: violation
13 of Labor Code 139.32 (c) in connection with referral of
14 attorney Robin Jacobs' clients to medical providers associated
15 with Defendant Arguello's companies.

11 COUNT 19: On or about and between June 01, 2013 and August 01,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, CARLOS ARGUELLO III, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C & E Technology, and Professional
19 Documents Management to an insurance benefit and payment, and to
20 the amount of a benefit and payment to which USA Photocopy, C &
21 E Technology, and Professional Documents Management was
22 entitled, namely: violation of Labor Code 139.32 (c) in
23 connection with copy services rendered for attorney Robin
24 Jacobs' workers' compensation cases by companies owned or
25 associated with Defendant Arguello.

22 ENHANCEMENT(S)

23 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,
24 15, 16, 17, 18 and 19, it is further alleged pursuant to Penal
25 Code section 12022.6(a)(3) (PROPERTY DAMAGE OVER \$1,300,000),
26 that SORAIDA VERONICA CASTRO, BORIS MIKHAYOVICH DADIOMOV, TANIA
27 ARGUELLO and CARLOS ARGUELLO III intentionally took, damaged,
28 and destroyed property valued in excess of one million three
hundred thousand dollars (\$1,300,000) during the commission and
attempted commission of the above offense.

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1 It is further alleged pursuant to Penal Code section 186.11(a)
2 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
3 to counts 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16,
4 17, 18 and 19, defendant CARLOS ARGUELLO III engaged in a
5 pattern of related fraudulent felony conduct involving the
6 taking of more than five hundred thousand dollars (\$500,000).

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

9 Dated 06-02-2017 at Orange County, California.

10 NH/AC 17F00389

11 TONY RACKAUCKAS, DISTRICT ATTORNEY

12 by: /s/ NOORUL HASAN

13 NOORUL HASAN, Deputy District Attorney

14 RESTITUTION CLAIMED

15 [] None

16 [] \$ _____

17 [X] To be determined

18 BAIL RECOMMENDATION:

19 SORAIDA VERONICA CASTRO - \$ 500,000.00

20 BORIS MIKHAYOVICH DADIOMOV - \$ 100,000.00

21 TANIA ARGUELLO - \$ 100,000.00

22 CARLOS ARGUELLO III - \$ 500,000.00

23 DULCE GALLEGOS - \$ 100,000.00

24 NOTICES:

25 The People request that defendant and counsel disclose, within
26 15 days, all of the materials and information described in Penal
27 Code section 1054.3, and continue to provide any later-acquired
28 materials and information subject to disclosure, and without
further request or order.

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Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

EXHIBIT 2

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1364

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 EDGAR GONZALEZ 08/15/66) OCDA WC12020005
12 C3585985)
13 AKA EDGAR GONZALEZ)
14 Defendant(s)

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

17 COUNT 1: On or about and between March 01, 2010 and June 02,
18 2017, in violation of Section 182(a)(1) of the Penal Code
19 (CONSPIRACY TO COMMIT A CRIME), a FELONY, EDGAR GONZALEZ did
20 unlawfully conspire together and with another person, whose
21 identity is unknown, to commit the crime of Referral of Clients
for Compensation, in violation of Section 3215 of the Labor
Code.

22 It is further alleged that pursuant to and for the purpose of
23 carrying out the objects and purposes of the conspiracy, one and
24 more of the conspirators committed the following overt acts:

25 OVERT ACT 1

26 Defendant Edgar Gonzalez formed USA Photocopy Service, a company
27 located in the County of Orange, in 2002.

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OVERT ACT 2

On or about March of 2010 Defendant Gonzalez's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with workers' compensation and personal injury attorneys for his marketing services until May of 2017 .

OVERT ACT 3

Defendant Gonzalez's associate Arguello obtained agreements from attorneys participating in his marketing scheme to use copy service companies owned, controlled or associated with him and Defendant Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 4

Defendant Gonzalez and his associate Arguello managed, controlled and directed the day to day operations of C & E Technology and Professional Documents Management, two copy service companies located in the County of Orange, and owned by their associate Tania Arguello-Plasencia.

OVERT ACT 5

Between March of 2010 and June of 2017, attorneys Dennis Fusi, Fari Rezai, Jon Woods, Lionel Giron, John Jansen, Jorge Reyes, Rony Barsoum, Payman Zargari, and Robin Jacobs, all of whom participated in Arguello's attorney advertising scheme, agreed to permit Defendant Gonzalez to send his employees to their respective law offices in order to create work orders for Defendant Gonzalez's copy service companies.

OVERT ACT 6

Defendant Gonzalez directed his employees to search client files located in the participating attorneys' law offices for any and all entities and locations that may be subpoenaed for records related to individual claims, and to then prepare and process work orders without first requiring attorney approval of each order.

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OVERT ACT 7

Defendant Gonzalez illegally directed his employees to scour records obtained through subpoenas in order to identify additional locations that may be added to the attorney's original work order, and to then process the amended work order without requiring approval of the attorney.

OVERT ACT 8

Defendant Gonzalez, through USA Photocopy, C&E Technology and Professional Documents Management, billed workers' compensation insurance providers for each individual subpoena served, and records obtained from it.

OVERT ACT 9

Between November 4, 2013 and September 2, 2015, Gonzalez illegally paid GM Associates \$318,839 for development and installation of legal case management software for his associate Dennis Fusi's law office, as an incentive and consideration for Fusi's continued referral of business to USA Photocopy.

OVERT ACT 10

Between August 2011 and May 1, 2017, Gonzalez illegally paid Peter Anthony Ayala approximately \$172,500 for sign-up services provided for the law office of Gonzalez's associate Robert Slater as an incentive and consideration for Slater's continued referral of business to USA Photocopy.

OVERT ACT 11

Between November 12, 2012 and January 22, 2016, Defendant Gonzalez illegally paid his associate Fari Rezai, an attorney, at least \$381,500 by making monthly payments to Sierra Custom Printing and Graphics, a company owned by Rezai's family member, as an incentive and consideration for Rezai's continued referral of business to Professional Documents Management and Defendant Gonzalez's other businesses.

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OVERT ACT 12

Between March 1, 2011 and June 1, 2017, USA Photocopy, Professional Documents Management and C&E Technology filed in access of one million dollars in liens with the Workers' Compensation Appeals Board, seeking payment from at least 40 different workers' compensation insurance carriers for copy services provided to attorneys participating in Defendant Gonzalez's and his associate Arguello's illegal referral scheme.

COUNT 2: On or about and between June 04, 2013 and June 01, 2017, in violation of Section 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to defraud, did unlawfully conceal and knowingly fail to disclose, and did knowingly assist with another person to conceal and fail to disclose the occurrence of an event and a fact that affected the initial and continued material right and entitlement of USA Photocopy, C & E Technology, and Professional Documents Management to an insurance benefit and payment, and to the amount of a benefit and payment to which USA Photocopy, C & E Technology, and Professional Documents Management was entitled, namely: violation of Labor Code 139.32 (c) in connection with copy services rendered for attorney Fari Rezai's workers' compensation cases by companies owned or associated with Defendant Gonzalez.

COUNT 3: On or about and between June 04, 2013 and June 01, 2017, in violation of Section 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to defraud, did unlawfully conceal and knowingly fail to disclose, and did knowingly assist with another person to conceal and fail to disclose the occurrence of an event and a fact that affected the initial and continued material right and entitlement of USA Photocopy, C & E Technology, and Professional Documents Management to an insurance benefit and payment, and to the amount of a benefit and payment to which USA Photocopy, C & E Technology, and Professional Documents Management was entitled, namely: violation of Labor Code 139.32 (c) in connection with copy services rendered for attorney Robert Slater's workers' compensation cases by companies owned or associated with Defendant Gonzalez.

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1 COUNT 4: On or about and between June 04, 2013 and June 01,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy, C & E Technology, and Professional Documents
9 Management to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which USA Photocopy, C & E
11 Technology, and Professional Documents Management was entitled,
12 namely: violation of Labor Code 139.32 (c) in connection with
13 copy services rendered for attorney Jon Woods' workers'
14 compensation cases by companies owned or associated with
15 Defendant Gonzalez.

16 COUNT 5: On or about and between June 04, 2013 and June 01,
17 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to
19 defraud, did unlawfully conceal and knowingly fail to disclose,
20 and did knowingly assist with another person to conceal and fail
21 to disclose the occurrence of an event and a fact that affected
22 the initial and continued material right and entitlement of USA
23 Photocopy, C & E Technology, and Professional Documents
24 Management to an insurance benefit and payment, and to the
25 amount of a benefit and payment to which USA Photocopy, C & E
26 Technology, and Professional Documents Management was entitled,
27 namely: violation of Labor Code 139.32 (c) in connection with
28 copy services rendered for attorney Lionel Giron's workers'
compensation cases by companies owned or associated with
Defendant Gonzalez.

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1 COUNT 6: On or about and between September 01, 2016 and June
2 01, 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy, C & E Technology, and Professional Documents
9 Management to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which USA Photocopy, C & E
11 Technology, and Professional Documents Management was entitled,
12 namely: violation of Labor Code 139.32 (c) in connection with
13 copy services rendered for attorney Dennis Fusi's workers'
14 compensation cases by companies owned or associated with
15 Defendant Gonzalez.

11 COUNT 7: On or about and between June 01, 2013 and August 01,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to
14 defraud, did unlawfully conceal and knowingly fail to disclose,
15 and did knowingly assist with another person to conceal and fail
16 to disclose the occurrence of an event and a fact that affected
17 the initial and continued material right and entitlement of USA
18 Photocopy, C & E Technology, and Professional Documents
19 Management to an insurance benefit and payment, and to the
20 amount of a benefit and payment to which USA Photocopy, C & E
21 Technology, and Professional Documents Management was entitled,
22 namely: violation of Labor Code 139.32 (c) in connection with
23 copy services rendered for attorney Jorge Reyes's workers'
24 compensation cases by companies owned or associated with
25 Defendant Gonzalez.

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1 COUNT 8: On or about and between June 01, 2013 and August 01,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy, C & E Technology, and Professional Documents
9 Management to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which USA Photocopy, C & E
11 Technology, and Professional Documents Management was entitled,
12 namely: violation of Labor Code 139.32 (c) in connection with
13 copy services rendered for attorney Rony Barsoum's workers'
14 compensation cases by companies owned or associated with
15 Defendant Gonzalez.

16 COUNT 9: On or about and between June 01, 2013 and June 02,
17 2017, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to
19 defraud, did unlawfully conceal and knowingly fail to disclose,
20 and did knowingly assist with another person to conceal and fail
21 to disclose the occurrence of an event and a fact that affected
22 the initial and continued material right and entitlement of USA
23 Photocopy, C & E Technology, and Professional Documents
24 Management to an insurance benefit and payment, and to the
25 amount of a benefit and payment to which USA Photocopy, C & E
26 Technology, and Professional Documents Management was entitled,
27 namely: violation of Labor Code 139.32 (c) in connection with
28 copy services rendered for attorney Payman Zargari's workers'
compensation cases by companies owned or associated with
Defendant Gonzalez.

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1 COUNT 10: On or about and between June 01, 2013 and August 01,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, EDGAR GONZALEZ, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy, C & E Technology, and Professional Documents
9 Management to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which USA Photocopy, C & E
11 Technology, and Professional Documents Management was entitled,
12 namely: violation of Labor Code 139.32 (c) in connection with
13 copy services rendered for attorney Robin Jacobs' workers'
14 compensation cases by companies owned or associated with
15 Defendant Gonzalez.

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ENHANCEMENT(S)

13 It is further alleged pursuant to Penal Code section 186.11(a)
14 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
15 to counts 2, 3, 4, 5, 6, 7, 8, 9 and 10, defendant EDGAR
16 GONZALEZ engaged in a pattern of related fraudulent felony
17 conduct involving the taking of more than five hundred thousand
18 dollars (\$500,000).

17 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10, it is further
18 alleged pursuant to Penal Code section 12022.6(a)(3) (PROPERTY
19 DAMAGE OVER \$1,300,000), that EDGAR GONZALEZ intentionally took,
20 damaged, and destroyed property valued in excess of one million
21 three hundred thousand dollars (\$1,300,000) during the
22 commission and attempted commission of the above offense.

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

24 Dated 06-02-2017 at Orange County, California.

25 NH/AC 17F00390

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27 TONY RACKAUCKAS, DISTRICT ATTORNEY

28 by: /s/ NOORUL HASAN

NOORUL HASAN, Deputy District Attorney

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RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

EDGAR GONZALEZ - \$ 500,000.00

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.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

EXHIBIT 3

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1367

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 RONY M BARSOUM 05/28/74) OCDA WC12020005
12 A7285078)
13 AKA RONY MAGDY BARSOUM)
14 JORGE HUMBERTO REYES 01/31/78)
15 A7235838)
16 AKA GORGE REYES)
17 Defendant(s))

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

19 COUNT 1: On or about and between March 01, 2010 and July 31,
20 2015, in violation of Section 182(a)(1) of the Penal Code
21 (CONSPIRACY TO COMMIT A CRIME), a FELONY, RONY M BARSOUM and
22 JORGE HUMBERTO REYES did unlawfully conspire together and with
23 another person, whose identity is unknown, to commit the crime
of REFERRAL OF CLIENTS FOR COMPENSATION, in violation of Section
3215 of the Labor Code.

24 It is further alleged that pursuant to and for the purpose of
25 carrying out the objects and purposes of the conspiracy, one and
26 more of the conspirators committed the following overt acts:

27 OVERT ACT 1

28 Defendants Jorge Reyes and Rony Barsoum are attorney licensed to
practice law in the State of California.

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OVERT ACT 2

In or about March of 2010 Defendants Reyes and Barsoum's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services until May of 2017.

OVERT ACT 3

On or about March 1, 2010, Defendants Reyes and Barsoum contracted with their associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendants Reyes and Barsoum agreed to allow Arguello to procure and deliver to them an agreed upon minimum number of retained clients per month for a monthly fee.

OVERT ACT 5

Defendants Reyes and Barsoum agreed to permit all clients procured for them by Arguello's joint marketing scheme to be referred to medical providers chosen by Arguello or companies associated with Arguello.

OVERT ACT 6

Defendants Reyes and Barsoum agreed to refer their copy service orders to companies owned or controlled by, or affiliated with, their associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between March 2010 and July 1, 2015, Defendants Reyes and Barsoum agreed to permit, and permitted, his associate Edgar Gonzalez, the owner of USA Photocopy, to send his copy service employees to Defendants's law firm in order to create work orders for Gonzalez's copy service companies.

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OVERT ACT 8

Defendants Reyes and Barsoum allowed Gonzalez's employees access to their client files in order for them to search its contents for any and all entities and locations that may be subpoenaed for records related to the case, and then permitted them to prepare and process work orders without any attorney supervision or approval.

OVERT ACT 9

Between March 2011 and July 1, 2015, Defendants Reyes and Barsoum unlawfully permitted Gonzalez and Gonzalez's employees to review subpoenaed records obtained by the copy services in order to find additional locations that may be added to the original work order, and to process the amended work order without any attorney oversight or approval.

OVERT ACT 10

Between March 15, 2011 and June 26, 2015, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$60,504 for attorney copy services rendered in claims where Defendants Reyes and Barsoum were the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 11

Between May 31, 2014 and July 31, 2015, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$128,259 from insurance companies for attorney copy services rendered in claims where Defendants Reyes and Barsoum were the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 12

Between November 17, 2011 and July 6, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$40,222 from insurance companies for attorney copy services rendered in claims where Defendants Reyes and Barsoum served as the claimant's attorney at anytime during the pendency of the claim.

1 COUNT 2: On or about and between June 06, 2014 and July 01,
2 2015, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
4 REYES did unlawfully solicit, accept, and refer business to and
5 from USA Photocopy, C&E Technology and Professional Documents
6 Mgmt., with the knowledge that, and with reckless disregard for
7 whether USA Photocopy, C&E Technology and Professional Documents
8 Mgmt. intended to violate Penal Code section 550 and Insurance
9 Code section 1871.4.

10 COUNT 3: On or about and between April 28, 2014 and January 25,
11 2016, in violation of Section 550(b)(3) of the Penal Code
12 (INSURANCE FRAUD), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
13 REYES, with the intent to defraud, did unlawfully conceal and
14 knowingly fail to disclose, and did knowingly assist with
15 another person to conceal and fail to disclose the occurrence of
16 an event and a fact that affected the initial and continued
17 material right and entitlement of Professional Documents Mgmt.
18 to an insurance benefit and payment, and to the amount of a
19 benefit and payment to which Professional Documents Mgmt. was
20 entitled, namely: violation of Labor Code 139.32(c) in
21 connection with copy services rendered and billed to AIG on
22 claim of Jose C.

23 COUNT 4: On or about and between April 01, 2014 and June 20,
24 2016, in violation of Section 550(b)(3) of the Penal Code
25 (INSURANCE FRAUD), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
26 REYES, with the intent to defraud, did unlawfully conceal and
27 knowingly fail to disclose, and did knowingly assist with
28 another person to conceal and fail to disclose the occurrence of
an event and a fact that affected the initial and continued
material right and entitlement of Professional Documents Mgmt.
to an insurance benefit and payment, and to the amount of a
benefit and payment to which Professional Documents Mgmt. was
entitled, namely: violation of Labor Code 139.32(c) in
connection with copy services rendered and billed to AIG on
claim of Herberto F.

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1 COUNT 5: On or about and between March 05, 2014 and October 30,
2 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
4 REYES, with the intent to defraud, did unlawfully conceal and
5 knowingly fail to disclose, and did knowingly assist with
6 another person to conceal and fail to disclose the occurrence of
7 an event and a fact that affected the initial and continued
8 material right and entitlement of Professional Documents Mgmt.
9 to an insurance benefit and payment, and to the amount of a
benefit and payment to which Professional Documents Mgmt. was
entitled, namely: violation of Labor Code 139.32(c) in
connection with copy services rendered and billed to Zenith on
claims of Natalie A., Juan C., Alan G., Jose L. and Luis B.

10 COUNT 6: On or about and between January 10, 2014 and January
11 07, 2016, in violation of Section 550(b)(3) of the Penal Code
12 (INSURANCE FRAUD), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
13 REYES, with the intent to defraud, did unlawfully conceal and
14 knowingly fail to disclose, and did knowingly assist with
15 another person to conceal and fail to disclose the occurrence of
16 an event and a fact that affected the initial and continued
17 material right and entitlement of Professional Documents Mgmt.
18 to an insurance benefit and payment, and to the amount of a
benefit and payment to which Professional Documents Mgmt. was
entitled, namely: violation of Labor Code 139.32 resulting in
billing to York Risk Services Group for copy services on claims
of Estrella O. and Guadalupe V. of \$2,667.40..

19 COUNT 7: On or about and between March 08, 2014 and May 06,
20 2016, in violation of Section 550(b)(3) of the Penal Code
21 (INSURANCE FRAUD), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
22 REYES, with the intent to defraud, did unlawfully conceal and
23 knowingly fail to disclose, and did knowingly assist with
24 another person to conceal and fail to disclose the occurrence of
25 an event and a fact that affected the initial and continued
26 material right and entitlement of Professional Documents Mgmt.
27 to an insurance benefit and payment, and to the amount of a
benefit and payment to which Professional Documents Mgmt. was
entitled, namely: violation of Labor Code 139.32 resulting in
payment by Travelers Insurance for copy services on claims of
Ana C., Jose R., and Jose S. of \$4,138.97..

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1 COUNT 8: On or about and between June 05, 2013 and July 01,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
4 REYES, with the intent to defraud, did unlawfully conceal and
5 knowingly fail to disclose, and did knowingly assist with
6 another person to conceal and fail to disclose the occurrence of
7 an event and a fact that affected the initial and continued
8 material right and entitlement of Professional Documents Mgmt.
9 to an insurance benefit and payment, and to the amount of a
10 benefit and payment to which Professional Documents Mgmt. was
11 entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to Employers
13 Insurance on claims of Maria M., Francisco M., Rosalina F.,
14 Gilberto L., Sergio O., Gabriela R., Julio R., Enrique G., and
15 Victor G.

11 COUNT 9: On or about and between December 20, 2013 and October
12 05, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, RONY M BARSOUM and JORGE HUMBERTO
14 REYES, with the intent to defraud, did unlawfully conceal and
15 knowingly fail to disclose, and did knowingly assist with
16 another person to conceal and fail to disclose the occurrence of
17 an event and a fact that affected the initial and continued
18 material right and entitlement of Professional Documents Mgmt.
19 to an insurance benefit and payment, and to the amount of a
20 benefit and payment to which Professional Documents Mgmt. was
21 entitled, namely: violation of Labor Code 139.32(c) in
22 connection with copy services rendered and billed to Sedgwick
23 Claims Management on claims of Juan R., Maria V., Hector F.,
24 Paula P., Celerino S., Mariano C., Victor M., and Yaneth C.

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

23 Dated 06-02-2017 at Orange County, California.

24 NH/AC 17F00388

26 TONY RACKAUCKAS, DISTRICT ATTORNEY

27 by: /s/ NOORUL HASAN

28 NOORUL HASAN, Deputy District Attorney

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RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

RONY M BARSOUM - \$ 100,000.00
JORGE HUMBERTO REYES - \$ 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.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1368

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 DENNIS RALPH FUSI 06/13/43) OCDA WC12020005
12 K0361945)
13 Defendant(s))

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

16 COUNT 1: On or about and between March 01, 2010 and June 02,
17 2017, in violation of Section 182(a)(1) of the Penal Code
18 (CONSPIRACY TO COMMIT A CRIME), a FELONY, DENNIS RALPH FUSI did
19 unlawfully conspire together and with another person, whose
20 identity is unknown, to commit the crime of REFERRAL OF CLIENTS
FOR COMPENSATION, in violation of Section 3215 of the Labor
Code.

21 It is further alleged that pursuant to and for the purpose of
22 carrying out the objects and purposes of the conspiracy, one and
23 more of the conspirators committed the following overt acts:

24 OVERT ACT 1

25 Defendant Dennis Fusi is an attorney licensed to practice law in
26 the State of California.

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OVERT ACT 2

In or about March of 2010 Defendant Fusi's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services until May of 2017.

OVERT ACT 3

On or about March 1, 2010, Defendant Fusi contracted with his associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendant Fusi agreed to allow Arguello to procure and deliver an agreed upon minimum number of retained clients per month in exchange for a monthly fee.

OVERT ACT 5

Defendant Fusi agreed to permit all clients procured for him by Arguello's joint marketing scheme to be referred to medical providers chosen by his associate Arguello or companies associated with Arguello.

OVERT ACT 6

Defendant Fusi agreed to refer his copy service orders to companies owned, controlled or affiliated with his associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between November 4, 2013 and September 2, 2015, Defendant Fusi accepted payments totaling \$318,839 paid to GM Associates by Gonzalez for development and installation of legal case management software for Defendant Fusi's law office as an incentive and consideration for Defendant Fusi's continued referral of business to USA Photocopy.

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OVERT ACT 8

Between April 11, 2011 and May 17, 2017, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$1,613,197 for attorney copy services rendered in claims where Defendant Fusi was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 9

Between July 24, 2014 and March 7, 2017, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$129,132 from insurance companies for attorney copy services rendered in claims where Defendant Fusi was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 10

Between November 21, 2011 and November 14, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$44,384 from insurance companies for attorney copy services rendered in claims where Defendant Fusi served as the claimant's attorney at anytime during the pendency of the claim.

COUNT 2: On or about and between June 05, 2014 and June 01, 2017, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, DENNIS RALPH FUSI did unlawfully solicit, accept, and refer business to and from Carlos Arguello III's companies, including Centro Legal Int'l, Justicia Legal Int'l and Providence Scheduling, with the knowledge that, and with reckless disregard for whether Carlos Arguello III's companies, including Centro Legal Int'l, Justicia Legal Int'l and Providence Scheduling intended to violate Penal Code section 550 and Insurance Code section 1871.4.

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1 COUNT 3: On or about and between June 05, 2014 and June 01,
2 2017, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, DENNIS RALPH FUSI did unlawfully
4 solicit, accept, and refer business to and from USA Photocopy,
5 C&E Technology and Professional Documents Mgmt., with the
6 knowledge that, and with reckless disregard for whether USA
7 Photocopy, C&E Technology and Professional Documents Mgmt.
8 intended to violate Penal Code section 550 and Insurance Code
9 section 1871.4.

10 COUNT 4: On or about and between January 01, 2014 and May 26,
11 2017, in violation of Section 550(b)(3) of the Penal Code
12 (INSURANCE FRAUD), a FELONY, DENNIS RALPH FUSI, with the intent
13 to defraud, did unlawfully conceal and knowingly fail to
14 disclose, and did knowingly assist with another person to
15 conceal and fail to disclose the occurrence of an event and a
16 fact that affected the initial and continued material right and
17 entitlement of USA Photocopy and C&E Technology to an insurance
18 benefit and payment, and to the amount of a benefit and payment
19 to which USA Photocopy and C&E Technology was entitled, namely:
20 violation of Labor Code 139.32(c) in connection with copy
21 services rendered and billed to Travelers Insurance on the
22 following claims: AIK2592, EHJ5512, ELW6623, ELW7229, EHJ9835,
23 EPH7805, E2F5254, A4A9939, E2X2848, EPH9004, A4A9475, A7E7489,
24 E2F6147, ELW3874, EKB1325, E1A9086, ELW5989, ELW8636, EPH6854,
25 E2F8847, E1A4034, E2F1826, E0B9261, CBC7577, E0B9561, E1A3699,
26 E0B9003, EPH9995, ELW2620, E2F7802, ELW7300, E0B8190, A4Z9619,
27 ELW7043, E1A6901, E1A9624, A4A5342, ELW4123, EPH2268, E0B1285,
28 E1G1706, CDA4627, E2F2021, EPH6566, ELW7392, ELW3002, ELW7392.

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1 COUNT 5: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, DENNIS RALPH FUSI, with the intent
4 to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy and Professional Documents Mgmt. to
9 an insurance benefit and payment, and to the amount of a benefit
10 and payment to which USA Photocopy and Professional Documents
11 Mgmt. was entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to Zenith
13 Insurance on the following claims: 602654, 597228, 628403,
14 595503, 600112, 597321, 605727, 583886, 616912, 629750, 651083,
15 586126, 651083, 687818.

11 COUNT 6: On or about and between January 01, 2014 and May 26,
12 2017, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, DENNIS RALPH FUSI, with the intent
14 to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which USA
20 Photocopy was entitled, namely: violation of Labor Code 139.32
21 (c) in connection with copy services rendered and billed to
22 Employers Insurance for the following claims:
23 2014273862, 2015282429, 2015285432, 2014232440, 2015257079, 2014
24 234509, 2015263149, 2013242154, 2014244716, 2014252612, 20142413
25 77, 2016310095, 2015269659, 2014252533, 2014247313, 2015288372,
26 2014253974, 2014223489, 2015267674, 2014248206, 2015277224,
27 2015262929, 2014239633, 2014254782, 2016301580, 2014222723,
28 2014225515, 2016299311, 2014246623, 2016312829, 2014242529,
2014240140, 2014247170, 2015271155, 2015277910, 2016298276,
2015269901.

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1 COUNT 7: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, DENNIS RALPH FUSI, with the intent
4 to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy and Professional Documents Mgmt. to
9 an insurance benefit and payment, and to the amount of a benefit
10 and payment to which USA Photocopy and Professional Documents
11 Mgmt. was entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to Zenith
13 Insurance on the following claims: 602654, 597228, 628403,
14 595503, 600112, 597321, 605727, 583886, 616912, 629750, 651083,
15 586126, 651083, 687818.

11 COUNT 8: On or about and between January 01, 2014 and May 26,
12 2017, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, DENNIS RALPH FUSI, with the intent
14 to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which USA
20 Photocopy was entitled, namely: violation of Labor Code 139.32
21 (c) in connection with copy services rendered and billed to
22 Employers Insurance for the following claims:
23 2014273862, 2015282429, 2015285432, 2014232440, 2015257079, 2014
24 234509, 2015263149, 2013242154, 2014244716, 2014252612, 20142413
25 77, 2016310095, 2015269659, 2014252533, 2014247313, 2015288372,
26 2014253974, 2014223489, 2015267674, 2014248206, 2015277224,
27 2015262929, 2014239633, 2014254782, 2016301580, 2014222723,
28 2014225515, 2016299311, 2014246623, 2016312829, 2014242529,
2014240140, 2014247170, 2015271155, 2015277910, 2016298276,
2015269901.

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1 COUNT 9: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, DENNIS RALPH FUSI, with the intent
4 to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocop to an insurance benefit and payment,
9 and to the amount of a benefit and payment to which USA Photocop
10 was entitled, namely: violation of Labor Code 139.32(c) in
11 connection with copy services rendered and billed to State
12 Compensation Insurance Fund for the following claims: 05277648,
05281942, 05357494, 05637158, 05834602, 05835650, 05875334,
05888084, 05938560, 05942260, 06003180, 06038122, 06049776,
06055716, 06063624, 06065806, 06067646, 06083600, 06086396,
06102740, 06122338, 06133888, 06193242, 06213906, 06244296,
SA632989, SA643185.

13 COUNT 10: On or about June 03, 2014, in violation of Section
14 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
15 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
16 receive, and accept a rebate, refund, commission, preference,
17 patronage, dividend, discount and other consideration, as
18 compensation and inducement for referring clients and patients
19 to perform and obtain services and benefits to wit: payments of
\$15,000 by Edgar Gonzalez to GM & Associates for design,
development and installation of case management software for
defendant's law office.

20 COUNT 11: On or about July 07, 2014, in violation of Section
21 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
22 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
23 receive, and accept a rebate, refund, commission, preference,
24 patronage, dividend, discount and other consideration, as
25 compensation and inducement for referring clients and patients
26 to perform and obtain services and benefits to wit: payment of
\$15,000 by Edgar Gonzalez to GM & Associates for design,
development and installation of case management software for
defendant's law office.

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1 COUNT 12: On or about September 05, 2014, in violation of
2 Section 3215 of the Labor Code (REFERRAL OF CLIENTS FOR
3 COMPENSATION), a FELONY, DENNIS RALPH FUSI did unlawfully offer,
4 deliver, receive, and accept a rebate, refund, commission,
5 preference, patronage, dividend, discount and other
6 consideration, as compensation and inducement for referring
7 clients and patients to perform and obtain services and benefits
to wit: payment of \$15,000 by Edgar Gonzalez to GM & Associates
for design, development and installation of case management
software for defendant's law office.

8 COUNT 13: On or about October 06, 2014, in violation of Section
9 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
10 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
11 receive, and accept a rebate, refund, commission, preference,
12 patronage, dividend, discount and other consideration, as
13 compensation and inducement for referring clients and patients
14 to perform and obtain services and benefits to wit: payment of
\$15,000 by Edgar Gonzalez to GM & Associates for design,
development and installation of case management software for
defendant's law office.

15 COUNT 14: On or about November 12, 2014, in violation of Section
16 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
17 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
18 receive, and accept a rebate, refund, commission, preference,
19 patronage, dividend, discount and other consideration, as
20 compensation and inducement for referring clients and patients
21 to perform and obtain services and benefits to wit: payment of
\$15,000 by Edgar Gonzalez to GM & Associates for design,
development and installation of case management software for
defendant's law office.

22
23 COUNT 15: On or about December 08, 2014, in violation of Section
24 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
25 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
26 receive, and accept a rebate, refund, commission, preference,
27 patronage, dividend, discount and other consideration, as
28 compensation and inducement for referring clients and patients
to perform and obtain services and benefits to wit: payment of
\$15,000 by Edgar Gonzalez to GM & Associates for design,
development and installation of case management software for
defendant's law office.

1 COUNT 16: On or about January 21, 2015, in violation of Section
2 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
3 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
4 receive, and accept a rebate, refund, commission, preference,
5 patronage, dividend, discount and other consideration, as
6 compensation and inducement for referring clients and patients
7 to perform and obtain services and benefits to wit: payment of
8 \$15,000 by Edgar Gonzalez to GM & Associates for design,
9 development and installation of case management software for
10 defendant's law office.

11 COUNT 17: On or about January 12, 2015, in violation of Section
12 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
13 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
14 receive, and accept a rebate, refund, commission, preference,
15 patronage, dividend, discount and other consideration, as
16 compensation and inducement for referring clients and patients
17 to perform and obtain services and benefits to wit: payment of
18 \$15,000 by Edgar Gonzalez to GM & Associates for design,
19 development and installation of case management software for
20 defendant's law office.

21 COUNT 18: On or about March 23, 2015, in violation of Section
22 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
23 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
24 receive, and accept a rebate, refund, commission, preference,
25 patronage, dividend, discount and other consideration, as
26 compensation and inducement for referring clients and patients
27 to perform and obtain services and benefits to wit: payment of
28 \$15,000 by Edgar Gonzalez to GM & Associates for design,
development and installation of case management software for
defendant's law office.

29 COUNT 19: On or about March 31, 2015, in violation of Section
30 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
31 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
32 receive, and accept a rebate, refund, commission, preference,
33 patronage, dividend, discount and other consideration, as
34 compensation and inducement for referring clients and patients
35 to perform and obtain services and benefits to wit: payment of
36 \$15,000 by Edgar Gonzalez to GM & Associates for design,
37 development and installation of case management software for
38 defendant's law office.

1 COUNT 20: On or about May 08, 2015, in violation of Section 3215
2 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
3 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
4 receive, and accept a rebate, refund, commission, preference,
5 patronage, dividend, discount and other consideration, as
6 compensation and inducement for referring clients and patients
7 to perform and obtain services and benefits to wit: payment of
8 \$15,000 by Edgar Gonzalez to GM & Associates for design,
9 development and installation of case management software for
10 defendant's law office.

11 COUNT 21: On or about August 10, 2015, in violation of Section
12 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
13 FELONY, DENNIS RALPH FUSI did unlawfully offer, deliver,
14 receive, and accept a rebate, refund, commission, preference,
15 patronage, dividend, discount and other consideration, as
16 compensation and inducement for referring clients and patients
17 to perform and obtain services and benefits to wit: payment of
18 \$15,000 by Edgar Gonzalez to GM & Associates for design,
19 development and installation of case management software for
20 defendant's law office.

21 COUNT 22: On or about September 02, 2015, in violation of
22 Section 3215 of the Labor Code (REFERRAL OF CLIENTS FOR
23 COMPENSATION), a FELONY, DENNIS RALPH FUSI did unlawfully offer,
24 deliver, receive, and accept a rebate, refund, commission,
25 preference, patronage, dividend, discount and other
26 consideration, as compensation and inducement for referring
27 clients and patients to perform and obtain services and benefits
28 to wit: payment of \$15,000 by Edgar Gonzalez to GM & Associates
for design, development and installation of case management
software for defendant's law office.

ENHANCEMENT(S)

It is further alleged pursuant to Penal Code section 186.11(a)
(1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
to counts 4, 5, 6, 7, 8 and 9, defendant DENNIS RALPH FUSI
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, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16,
2 17, 18, 19, 20, 21 and 22, it is further alleged pursuant to
3 Penal Code section 12022.6(a)(2) (PROPERTY LOSS OVER \$200,000),
4 that DENNIS RALPH FUSI intentionally took, damaged, and
5 destroyed property valued in excess of two hundred thousand
dollars (\$200,000) during the commission and attempted
commission of the above offense.

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

8 Dated 06-02-2017 at Orange County, California.
9 NH/AC 17F00382

10
11 TONY RACKAUCKAS, DISTRICT ATTORNEY

12 by: /s/ NOORUL HASAN
13 NOORUL HASAN, Deputy District Attorney

14 RESTITUTION CLAIMED

15 [] None
16 [] \$ _____
17 [X] To be determined

18 BAIL RECOMMENDATION:

19 DENNIS RALPH FUSI - \$ 500,000.00
20

21 NOTICES:

22 The People request that defendant and counsel disclose, within
23 15 days, all of the materials and information described in Penal
24 Code section 1054.3, and continue to provide any later-acquired
25 materials and information subject to disclosure, and without
further request or order.

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Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1361

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 FARI A REZAI 11/18/70) OCDA WC12020005
12 A2595885)
13 Defendant(s))

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

16 COUNT 1: On or about and between March 01, 2010 and June 02,
17 2017, in violation of Section 182(a)(1) of the Penal Code
18 (CONSPIRACY TO COMMIT A CRIME), a FELONY, FARI A REZAI did
19 unlawfully conspire together and with another person, whose
20 identity is unknown, to commit the crime of REFERRAL OF CLIENTS
FOR COMPENSATION, in violation of Section 3215 of the Labor
Code.

21 It is further alleged that pursuant to and for the purpose of
22 carrying out the objects and purposes of the conspiracy, one and
23 more of the conspirators committed the following overt acts:

24 OVERT ACT 1

25 Defendant Fari Rezai is an attorney licensed to practice law in
26 the State of California.

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OVERT ACT 2

In or about March of 2010 Defendant Rezai's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services until May of 2017.

OVERT ACT 3

On or about March 1, 2010, Defendant Rezai contracted with his associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendant Rezai agreed to allow Arguello to procure and deliver to him an agreed upon minimum number of retained clients per month for a monthly fee.

OVERT ACT 5

Defendant Rezai agreed to permit all clients procured for him by Arguello's joint marketing scheme to be referred to medical providers chosen by Arguello or companies associated with Arguello.

OVERT ACT 6

Defendant Rezai agreed to refer his copy service orders to companies owned or controlled by, or affiliated with, his associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between March of 2011 and June of 2017, Defendant Rezai agreed to permit and permitted his associate Edgar Gonzalez, the owner of USA Photocopy, to send his copy service employees to Defendant's law firm in order to create work orders for Gonzalez's copy service companies.

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OVERT ACT 8

Defendant Rezai allowed Gonzalez's employees access to his client files in order for them to search its contents for any and all entities and locations that may be subpoenaed for records related to the case, and then permitted them to prepare and process work orders without any attorney supervision or approval.

OVERT ACT 9

Defendant Rezai unlawfully permitted Gonzalez and Gonzalez's employees to review subpoenaed records obtained by the copy services in order to find additional locations that may be added to the original work order, and to process the amended work order without any attorney oversight or approval.

OVERT ACT 10

Between November 12, 2012 and January 22, 2016, Defendant Rezai unlawfully accepted and received at least \$381,500 from his associate Edgar Gonzalez by way of monthly payments made to Sierra Custom Printing and Graphics, a company owned by Defendant Rezai's immediate family member, as an incentive and consideration for Defendant Rezai's continued referral of business to Professional Documents Management and Defendant Gonzalez's other businesses.

OVERT ACT 11

Between March 7, 2011 and March 10, 2017, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$706,747 for attorney copy services rendered in claims where Defendant Rezai was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 12

Between March 25, 2014 and May 12, 2017, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$7,125,480 from insurance companies for attorney copy services rendered in claims where Defendant Rezai was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 13

Between October 10, 2011 and December 17, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$928,058 from insurance companies for attorney copy services rendered in claims where Defendant Rezai served as the claimant's attorney at anytime during the pendency of the claim.

COUNT 2: On or about and between March 01, 2010 and June 02, 2017, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, FARI A REZAI did unlawfully solicit, accept, and refer business to and from Carlos Arguello III's companies, including Centro Legal Int'l, Justicia Legal Int'l, with the knowledge that, and with reckless disregard for whether Carlos Arguello III's companies, including Centro Legal Int'l, Justicia Legal Int'l intended to violate Penal Code section 550 and Insurance Code section 1871.4.

COUNT 3: On or about and between March 01, 2010 and June 02, 2017, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, FARI A REZAI did unlawfully solicit, accept, and refer business to and from USA Photocopy, C&E Technology and Professional Documents Mgmt., with the knowledge that, and with reckless disregard for whether USA Photocopy, C&E Technology and Professional Documents Mgmt. intended to violate Penal Code section 550 and Insurance Code section 1871.4.

COUNT 4: On or about and between March 01, 2010 and June 01, 2017, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, FARI A REZAI did unlawfully solicit, accept, and refer business to and from medical providers selected by Providence Scheduling, with the knowledge that, and with reckless disregard for whether medical providers selected by Providence Scheduling intended to violate Penal Code section 550 and Insurance Code section 1871.4.

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1 COUNT 5: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, FARI A REZAI, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of
8 Professional Documents Mgmt. to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 Professional Documents Mgmt. was entitled, namely: violation of
11 Labor Code 139.32 (c) in connection with copy services rendered
12 and billed to Berkshire Hathaway Homestate Companies on the
13 following claims: 33049204, 33055935, 22025684, 33050287,
14 33058421, 22025162, 33054059, 33051582, 33058221, 33055523,
15 33048564, 33047218, 33060961, 44015654, 33053822, 33059822,
16 22026663, 33058424, 22025296, 33055277, 33048348, 33056008,
17 33055435, 33052372, 33050219, 33048293, 33057507, 33061654,
18 33072029, 33054601, 33055921

13 COUNT 6: On or about and between January 01, 2014 and May 26,
14 2017, in violation of Section 550(b)(3) of the Penal Code
15 (INSURANCE FRAUD), a FELONY, FARI A REZAI, with the intent to
16 defraud, did unlawfully conceal and knowingly fail to disclose,
17 and did knowingly assist with another person to conceal and fail
18 to disclose the occurrence of an event and a fact that affected
19 the initial and continued material right and entitlement of USA
20 Photocopy, C&E Technology and Professional Documents Mgmt. to an
21 insurance benefit and payment, and to the amount of a benefit
22 and payment to which USA Photocopy, C&E Technology and
23 Professional Documents Mgmt. was entitled, namely: violation of
24 Labor Code 139.32 (c) in connection with copy services rendered
25 and billed to Travelers Insurance on the following claims:
26 E0B4208, EPH0114, ELW1802, EPH7815, E0B6401, E0B1165, E2F1070,
27 A4A8950, E2F0783, E0B1397, E3A0782, E2F5949, A4A7975, E2F9092,
28 E2F7914, E3V4490, E2F9578, EPH8188, ELW6595, E2F0145, A4A7908,
CBU9511, EPH6549, EMW7260, EHJ3628, E5Z2253, E0B4295, E0B4991,
E3G7064, E2X2427, CBU9511, ELW0163, E3V4505, E3V3280, EPH9309,
EHJ3076, E4G6740, E2F6221, E0B4388, E2F8194, E2F7958, E0B5481,
E3V7971, E3V1799, E3V2598, E0B6381, E0B7341, EPH1940, E0B8529

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1 COUNT 7: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, FARI A REZAI, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of
8 Professional Documents Mgmt. to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 Professional Documents Mgmt. was entitled, namely: violation of
11 Labor Code 139.32 (c) in connection with copy services rendered
12 and billed to Zenith Insurance on the following claims: 597372,
13 612206, 616371, 611353, 602958, 606601, 622229, 597099, 602495,
14 597211, 618049, 605260, 614725, 593578, 612511, 612606, 612059,
15 616492, 620033, 599774, 598977, 609319, 590027, 617902, 589794,
16 618037, 609585, 624901, 602445, 614766, 633085, 626301, 616621,
17 598422, 611702, 616047, 599917, 608149, 608270, 630633, 625010,
18 591970, 594743, 587271, 608035, 606450, 633299, 600895, 598641,
19 618088.

20 COUNT 8: On or about and between January 01, 2014 and May 26,
21 2017, in violation of Section 550(b)(3) of the Penal Code
22 (INSURANCE FRAUD), a FELONY, FARI A REZAI, with the intent to
23 defraud, did unlawfully conceal and knowingly fail to disclose,
24 and did knowingly assist with another person to conceal and fail
25 to disclose the occurrence of an event and a fact that affected
26 the initial and continued material right and entitlement of USA
27 Photocopy, C&E Technology and Professional Documents Mgmt. to an
28 insurance benefit and payment, and to the amount of a benefit
and payment to which USA Photocopy, C&E Technology and
Professional Documents Mgmt. was entitled, namely: violation of
Labor Code 139.32 (c) in connection with copy services rendered
and billed to Employers Insurance on the following claims:
2013211109, 2014250534, 2015268539, 2014247959, 2012233034,
2014253326, 2014257172, 2016291170, 2016300000, 2016299751,
2016288920, 2015269263, 2015276458, 2015258516, 2013228274,
2012269689, 2015271057, 2014233064, 2013208541, 2014225608,
2014260767, 2009231959, 2010132220, 2014271929, 2013201435,
2014231218, 2014290860, 2013200949, 2014227051, 2014252198,
2013204330, 2014222502, 2014252669, 2014268058, 2014232605,
2012244501, 2014249177, 2012209876, 2014237608, 2013213855,
2014249514, 2008106290, 2013277643, 2011146942, 2014233614,
2012192493, 2013192275, 2013258839, 2013218988, 2013204001,
2014254248, 2014251179.

1 COUNT 9: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, FARI A REZAI, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of
8 Professional Documents Mgmt. to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 Professional Documents Mgmt. was entitled, namely: violation of
11 Labor Code 139.32 (c) in connection with copy services rendered
12 and billed to Zurich Insurance on the following claims:
13 2080303038, 2010235885, 2080289042, 2080310025, 2080306577,
14 2010238029, 2080297693, 2080312802, 2080310114, 2010236551,
15 2010239127, 2080302738, 2080301662, 2080317252, 2080303741,
16 2080303083, 2080311119, 2010240866, 2010239677, 2010238549,
17 2080305890, 2080298203, 2080312790, 2010235161, 2010238773,
18 2080310152, 2080278944, 2230306628, 2010243058, 2080313493,
19 2010240135, 2080302499, 2080312733, 2080312864, 2010247209,
20 2010260407, 2080309956, 2010243500, 2080311224, 2080305760,
21 2080329179, 2010235948, 2010263196, 2080307428, 2010242886,
22 2080302370, 2080320090, 2080315407, 2080306740, 2080301255.

16 COUNT 10: On or about and between June 06, 2014 and January 22,
17 2016, in violation of Section 3215 of the Labor Code (REFERRAL
18 OF CLIENTS FOR COMPENSATION), a FELONY, FARI A REZAI did
19 unlawfully offer, deliver, receive, and accept a rebate, refund,
20 commission, preference, patronage, dividend, discount and other
21 consideration, as compensation and inducement for referring
22 clients and patients to perform and obtain services and benefits
23 to wit payments by Edgar Gonzalez, owner and operator of copy
24 service companies, of \$381,000 from 11/12/12 to January 22,
25 2016.

23 ENHANCEMENT(S)

24
25 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10, it is further
26 alleged pursuant to Penal Code section 12022.6(a)(3) (PROPERTY
27 DAMAGE OVER \$1,300,000), that FARI A REZAI intentionally took,
28 damaged, and destroyed property valued in excess of one million
three hundred thousand dollars (\$1,300,000) during the
commission and attempted commission of the above offense.

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1 It is further alleged pursuant to Penal Code section 186.11(a)
2 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
3 to counts 5, 6, 7, 8 and 9, defendant FARI A REZAI engaged in a
4 pattern of related fraudulent felony conduct involving the
taking of more than five hundred thousand dollars (\$500,000).

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

7 Dated 06-02-2017 at Orange County, California.
8 NH/AC 17F00393

9
10 TONY RACKAUCKAS, DISTRICT ATTORNEY

11 by: /s/ NOORUL HASAN
12 NOORUL HASAN, Deputy District Attorney

13 RESTITUTION CLAIMED

14 [] None
15 [] \$ _____
16 [X] To be determined

17 BAIL RECOMMENDATION:

18 FARI A REZAI - \$ 500,000.00

19 NOTICES:

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21 The People request that defendant and counsel disclose, within
22 15 days, all of the materials and information described in Penal
23 Code section 1054.3, and continue to provide any later-acquired
24 materials and information subject to disclosure, and without
further request or order.

25 Pursuant to Welfare & Institutions Code §827 and California Rule
26 of Court 5.552, notice is hereby given that the People will seek
27 a court order to disseminate the juvenile case file of the
28 defendant/minor, if any exists, to all parties in this action,
through their respective attorneys of record, in the prosecution
of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1365

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 JOHN JANSEN 07/02/67) OCDA WC12020005
12 C3650179)
13 AKA GERALD JOHN JANSEN)
14 Defendant(s)

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

17 COUNT 1: On or about and between June 01, 2014 and June 02,
18 2017, in violation of Section 182(a)(1) of the Penal Code
19 (CONSPIRACY TO COMMIT A CRIME), a FELONY, JOHN JANSEN did
20 unlawfully conspire together and with another person, whose
21 identity is unknown, to commit the crime of REFERRAL OF CLIENTS
FOR COMPENSATION, in violation of Section 3215 of the Labor
Code.

22 It is further alleged that pursuant to and for the purpose of
23 carrying out the objects and purposes of the conspiracy, one and
24 more of the conspirators committed the following overt acts:

25 OVERT ACT 1

26 Defendant John Jansen is an attorney licensed to practice law in
27 the State of California.

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OVERT ACT 2

In or about March of 2010 Defendant Jansen's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services until May of 2017.

OVERT ACT 3

On or about June 1, 2011, Defendant Jansen contracted with his associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendant Jansen agreed to allow Arguello to procure and deliver to him an agreed upon minimum number of retained clients per month for a monthly fee.

OVERT ACT 5

Defendant Jansen agreed to permit all clients procured for him by Arguello's joint marketing scheme to be referred to medical providers chosen by Arguello or companies associated with Arguello.

OVERT ACT 6

Defendant Jansen agreed to refer his copy service orders to companies owned or controlled by, or affiliated with, his associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between June 1, 2011 and June 1, 2017, Defendant Jansen agreed to permit, and permitted, his associate Edgar Gonzalez, the owner of USA Photocopy, to send his copy service employees to Defendant's law firm in order to create work orders for Gonzalez's copy service companies.

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OVERT ACT 8

Defendant Jansen allowed Gonzalez's employees access to his client files in order for them to search its contents for any and all entities and locations that may be subpoenaed for records related to the case, and then permitted them to prepare and process work orders without any attorney supervision or approval.

OVERT ACT 9

Defendant Jansen unlawfully permitted Gonzalez and Gonzalez's employees to review subpoenaed records obtained by the copy services in order to find additional locations that may be added to the original work order, and to process the amended work order without any attorney oversight or approval.

OVERT ACT 10

Between July 12, 2013 and May 18, 2017, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$192,466 for attorney copy services rendered in claims where Defendant Jansen was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 11

Between April 12, 2014 and May 16, 2017, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$1,615,816 from insurance companies for attorney copy services rendered in claims where Defendant Jansen was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 12

Between June 11, 2013 and February 29, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$40,222 from insurance companies for attorney copy services rendered in claims where Defendant Jansen served as the claimant's attorney at anytime during the pendency of the claim.

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1 COUNT 2: On or about and between June 05, 2014 and June 01,
2 2017, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, JOHN JANSEN did unlawfully solicit,
4 accept, and refer business to and from Carlos Arguello III's
5 companies, including Centro Legal Int'l, Justicia Legal Int'l,
6 and Centro de Abogado Int'l,, with the knowledge that, and with
7 reckless disregard for whether Carlos Arguello III's companies,
including Centro Legal Int'l, Justicia Legal Int'l, and Centro
de Abogado Int'l, intended to violate Penal Code section 550 and
Insurance Code section 1871.4.

8 COUNT 3: On or about and between June 05, 2014 and June 01,
9 2017, in violation of Section 549 of the Penal Code (FALSE AND
10 FRAUDULENT CLAIM), a FELONY, JOHN JANSEN did unlawfully solicit,
11 accept, and refer business to and from USA Photocopy, C&E
12 Technology and Professional Documents Mgmt., with the knowledge
13 that, and with reckless disregard for whether USA Photocopy, C&E
Technology and Professional Documents Mgmt. intended to violate
Penal Code section 550 and Insurance Code section 1871.4.

14 COUNT 4: On or about and between June 05, 2014 and June 02,
15 2017, in violation of Section 549 of the Penal Code (FALSE AND
16 FRAUDULENT CLAIM), a FELONY, JOHN JANSEN did unlawfully solicit,
17 accept, and refer business to and from medical providers
18 selected by Providence Scheduling, with the knowledge that, and
19 with reckless disregard for whether medical providers selected
by Providence Scheduling intended to violate Penal Code section
550 and Insurance Code section 1871.4.

20 COUNT 5: On or about and between August 25, 2014 and March 06,
21 2015, in violation of Section 550(b)(3) of the Penal Code
22 (INSURANCE FRAUD), a FELONY, JOHN JANSEN, with the intent to
23 defraud, did unlawfully conceal and knowingly fail to disclose,
24 and did knowingly assist with another person to conceal and fail
25 to disclose the occurrence of an event and a fact that affected
26 the initial and continued material right and entitlement of
27 Professional Documents Mgmt. to an insurance benefit and
28 payment, and to the amount of a benefit and payment to which
Professional Documents Mgmt. was entitled, namely: violation of
Labor Code 139.32(c) in connection with copy services rendered
and billed to AIG on claim for Gloria G.

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1 COUNT 6: On or about and between April 08, 2014 and September
2 10, 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JOHN JANSEN, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of
8 Professional Documents Mgmt. to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
Professional Documents Mgmt. was entitled, namely: violation of
Labor Code 139.32(c) in connection with copy services redereed
and billed to Zenith Insurance on claims of Maria H., Manuel M.,
and Edgar T.

10 COUNT 7: On or about January 02, 2015, in violation of Section
11 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, JOHN
12 JANSEN, with the intent to defraud, did unlawfully conceal and
13 knowingly fail to disclose, and did knowingly assist with
14 another person to conceal and fail to disclose the occurrence of
15 an event and a fact that affected the initial and continued
16 material right and entitlement of Professional Documents Mgmt.
17 to an insurance benefit and payment, and to the amount of a
18 benefit and payment to which Professional Documents Mgmt. was
entitled, namely: violation of Labor Code 139.32(c) in
connection with copy services rendered and billed to Travelers
Insurance on claim of Julia I.

19 COUNT 8: On or about and between June 05, 2013 and June 02,
20 2017, in violation of Section 550(b)(3) of the Penal Code
21 (INSURANCE FRAUD), a FELONY, JOHN JANSEN, with the intent to
22 defraud, did unlawfully conceal and knowingly fail to disclose,
23 and did knowingly assist with another person to conceal and fail
24 to disclose the occurrence of an event and a fact that affected
25 the initial and continued material right and entitlement of
26 Professional Documents Mgmt. to an insurance benefit and
27 payment, and to the amount of a benefit and payment to which
Professional Documents Mgmt. was entitled, namely: violation of
Labor Code 139.32(c) connection with copy services rendered and
billed to Employers Insurance on claims of Gabriel R., Miguel
C., Rosa V., Gabino M., and Villalba C.

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1 COUNT 9: On or about and between April 01, 2014 and July 29,
2 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JOHN JANSEN, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of
8 Professional Documents Mgmt. to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
Professional Documents Mgmt. was entitled, namely: violation of
Labor Code 139.32(c) connection with copy services rendered and
billed to Berkshire Hathaway Homstate Companies on claims of
Jorge S. and Roberto G.

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

12 Dated 06-02-2017 at Orange County, California.
13 NH/AC 17F00386

14
15 TONY RACKAUCKAS, DISTRICT ATTORNEY

16 by: /s/ NOORUL HASAN
17 NOORUL HASAN, Deputy District Attorney

18 RESTITUTION CLAIMED

19 [] None
20 [] \$ _____
21 [X] To be determined

22 BAIL RECOMMENDATION:

23 JOHN JANSEN - \$ 100,000.00
24

25 NOTICES:

26 The People request that defendant and counsel disclose, within
27 15 days, all of the materials and information described in Penal
28 Code section 1054.3, and continue to provide any later-acquired
materials and information subject to disclosure, and without
further request or order.

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Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1373

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 JON WOODS 07/03/61) OCDA WC12020005
12 N7572359)
13 AKA JON MICHAEL WOODS)
14 JON M WOODS)
Defendant(s))

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

17 COUNT 1: On or about and between June 01, 2011 and June 02,
18 2017, in violation of Section 182(a)(1) of the Penal Code
19 (CONSPIRACY TO COMMIT A CRIME), a FELONY, JON WOODS did
20 unlawfully conspire together and with another person, whose
21 identity is unknown, to commit the crime of REFERRAL OF CLIENTS
22 FOR COMPENSATION, in violation of Section 3215 of the Labor
Code.

23 It is further alleged that pursuant to and for the purpose of
24 carrying out the objects and purposes of the conspiracy, one and
more of the conspirators committed the following overt acts:

25 OVERT ACT 1

26 Defendant Jon Woods is an attorney licensed to practice law in
27 the State of California.
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OVERT ACT 2

In or about March of 2010 Defendant Woods's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services until May of 2017.

OVERT ACT 3

On or about June 1, 2011, Defendant Woods contracted with his associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendant Woods agreed to allow Arguello to procure and deliver to him an agreed upon minimum number of retained clients per month for a monthly fee.

OVERT ACT 5

Defendant Woods agreed to permit all clients procured for him by Arguello's joint marketing scheme to be referred to medical providers chosen by Arguello or companies associated with Arguello.

OVERT ACT 6

Defendant Woods agreed to refer his copy service orders to companies owned or controlled by, or affiliated with, his associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between June 1, 2011 and June 1, 2017, Defendant Woods agreed to permit, and permitted, his associate Edgar Gonzalez, the owner of USA Photocopy, to send his copy service employees to Defendant's law firm in order to create work orders for Gonzalez's copy service companies.

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OVERT ACT 8

Defendant Woods allowed Gonzalez's employees access to his client files in order for them to search its contents for any and all entities and locations that may be subpoenaed for records related to the case, and then permitted them to prepare and process work orders without any attorney supervision or approval.

OVERT ACT 9

Defendant Woods unlawfully permitted Gonzalez and Gonzalez's employees to review subpoenaed records obtained by the copy services in order to find additional locations that may be added to the original work order, and to process the amended work order without any attorney oversight or approval.

OVERT ACT 10

Between June 15, 2011 and May 16, 2017, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$1,316,952 for attorney copy services rendered in claims where Defendant Woods was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 11

Between April 22, 2014 and May 12, 2017, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$702,027 from insurance companies for attorney copy services rendered in claims where Defendant Woods was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 12

Between October 7, 2011 and November 19, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$40,222 from insurance companies for attorney copy services rendered in claims where Defendant Woods served as the claimant's attorney at anytime during the pendency of the claim.

1 COUNT 2: On or about and between June 05, 2014 and June 02,
2 2017, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, JON WOODS did unlawfully solicit,
4 accept, and refer business to and from Carlos Arguello III's
5 companies, including Centro Legal Int'l, Justicia Legal Int'l
6 and Centro de Abogados Int'l, with the knowledge that, and with
7 reckless disregard for whether Carlos Arguello III's companies,
including Centro Legal Int'l, Justicia Legal Int'l and Centro de
Abogados Int'l intended to violate Penal Code section 550 and
Insurance Code section 1871.4.

8 COUNT 3: On or about and between June 05, 2014 and June 02,
9 2017, in violation of Section 549 of the Penal Code (FALSE AND
10 FRAUDULENT CLAIM), a FELONY, JON WOODS did unlawfully solicit,
11 accept, and refer business to and from USA Photocopy, C&E
12 Technology and Professional Documents Mgmt., with the knowledge
13 that, and with reckless disregard for whether USA Photocopy, C&E
Technology and Professional Documents Mgmt. intended to violate
Penal Code section 550 and Insurance Code section 1871.4.

14 COUNT 4: On or about and between June 05, 2014 and June 02,
15 2017, in violation of Section 549 of the Penal Code (FALSE AND
16 FRAUDULENT CLAIM), a FELONY, JON WOODS did unlawfully solicit,
17 accept, and refer business to and from medical providers
18 selected by Providence Scheduling, with the knowledge that, and
19 with reckless disregard for whether medical providers selected
by Providence Scheduling intended to violate Penal Code section
550 and Insurance Code section 1871.4.

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1 COUNT 5: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JON WOODS, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy and Professional Documents Mgmt. to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which USA Photocopy and Professional Documents Mgmt. was
11 entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to Berkshire
13 Hathaway Homestate Companies on the following claims: 33050545,
14 22026167, 33051228, 22027107, 33068401, 33068649, 55041900,
15 33067987, 33073548, 55049819, 44018832, 33069051, 33058452,
33055690, 44019178, 33058828, 33051776, 33063041, 22026007,
33060452, 33081846, 33067104, 33067987, 33068996, 33064638,
55042308, 33062090, 33071569, 33047144, 33048054, 33049733,
33050371, 33051631, 33054318, 33056078, 33060481, 33062821,
33063138, 33063689, 33063723, 22027900, 33065574, 22028045,
44018175, 55040736, 33067848, 55042219, 33069676, 33069000,
33069369, 33071327.

16 COUNT 6: On or about and between January 01, 2014 and May 26,
17 2017, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, JON WOODS, with the intent to
19 defraud, did unlawfully conceal and knowingly fail to disclose,
20 and did knowingly assist with another person to conceal and fail
21 to disclose the occurrence of an event and a fact that affected
22 the initial and continued material right and entitlement of USA
23 Photocopy and Professional Documents Mgmt. to an insurance
24 benefit and payment, and to the amount of a benefit and payment
25 to which USA Photocopy and Professional Documents Mgmt. was
26 entitled, namely: violation of Labor Code 139.32(c) in
27 connection with copy services rendered and billed to Travelers
Insurance on the following claims: EHJ4470, E0B7430, ELW7229,
E0B0504, EPH5888, EGJ9393, E2F4860, E0B4779, E0B9879, E2F5171,
E2X3619, E0B9171, E0B3734, E0B4191, E2F5209, E0B1471, E0B2846,
E2F5924, EPH4304, E1G0341, E0B7070, E2F5184, E3V7402, E0B7785,
E2F3752, E1J3821, A4A0791, E5Z3044, E3V4672, E0B6062.

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1 COUNT 7: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JON WOODS, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy and Professional Documents Mgmt. to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which USA Photocopy and Professional Documents Mgmt. was
11 entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to Zenith
13 Insurance on the following claims: 596857, 598020, 598750,
617187, 588545, 591506, 620729, 597019, 598573, 610147, 614806,
584161, 606332, 625455, 626309, 613620, 633067, 638292, 648367,
642249, 618619, 608660, 594845, 611753, 644225, 608215, 613387,
626621, 598225, 622264, 614568, 626308, 635183, 619947, 617883,
584163, 652557, 599655, 635230, 635573, 620365, 607355, 642027,
612844, 624701, 626871, 632603, 636998, 611215, 642023.

14 COUNT 8: On or about and between January 01, 2014 and May 26,
15 2017, in violation of Section 550(b)(3) of the Penal Code
16 (INSURANCE FRAUD), a FELONY, JON WOODS, with the intent to
17 defraud, did unlawfully conceal and knowingly fail to disclose,
18 and did knowingly assist with another person to conceal and fail
19 to disclose the occurrence of an event and a fact that affected
20 the initial and continued material right and entitlement of
21 Professional Documents Mgmt. to an insurance benefit and
22 payment, and to the amount of a benefit and payment to which
23 Professional Documents Mgmt. was entitled, namely: violation of
24 Labor Code 139.32(c) in connection with copy services rendered
25 and billed to Employers Insurance on the following claims:
26 2014222171, 2014223572, 2014232018, 2014243406, 2014243504,
27 2014244229, 2014247317, 2014247394, 2014249721, 2014249912,
2014250223, 2014250655, 2014250668, 2014251036, 2014266304,
2014267779, 2014275533, 2015258986, 2015263652, 2015264281,
2015264612, 2015265816, 2015267113, 2015268095, 2015268172,
2015269808, 2015270062, 2015271773, 2015271964, 2015272186,
2015274573, 2015275287, 2015276246, 2015279017, 2015282157,
2015284385, 2015284643, 2015297053, 2016293546, 2016306856,
2015284931, 2015285359, 2015287104, 2015287106, 2015289531.

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1 COUNT 9: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JON WOODS, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy and Professional Documents Mgmt. to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which USA Photocopy and Professional Documents Mgmt. was
11 entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to Zurich
13 Insurance on the following claims: 2010236062, 2080314044,
14 2010235140, 2080305052, 2080313042, 2080301593, 2080302954,
15 2080300872, 2080310583, 2080317463, 2080332923, 2080320746,
16 2080310122, 2080330189, 2080319183, 2010235531, 2080299287,
17 2080312401, 2080310961, 2010260064, 2010236741, 2080312480,
18 2010249172, 2080319183, 2080332094, 2080335629, 2080300935,
19 2080319798, 2010253864, 2080326631, 2080258162, 2080320646,
20 2010234323, 2080310087, 2080318265, 2080332026, 2080325862,
21 2080336050, 2080330458, 2080307013, 2080304205, 2080338323,
22 2080320193, 2080340167, 2080305332, 2080298067, 2080298841,
23 2080333485, 2010242296, 2010278603.

17 COUNT 10: On or about and between January 01, 2014 and May 26,
18 2017, in violation of Section 550(b)(3) of the Penal Code
19 (INSURANCE FRAUD), a FELONY, JON WOODS, with the intent to
20 defraud, did unlawfully conceal and knowingly fail to disclose,
21 and did knowingly assist with another person to conceal and fail
22 to disclose the occurrence of an event and a fact that affected
23 the initial and continued material right and entitlement of USA
24 Photocopy and Professional Documents Mgmt. to an insurance
25 benefit and payment, and to the amount of a benefit and payment
26 to which USA Photocopy and Professional Documents Mgmt. was
27 entitled, namely: violation of Labor Code 139.32(c) in
28 connection with copy services rendered and billed to State
Compensation Insurance Fund for on the following claims:
05697000, 05959206, 05972740, 05992200, 05993196, 06003268,
06003510, 06043216, 06043962, 06048144, 06055446, 06059960,
06065684, 06069118, 06079950, 06082676, 06084464, 06086662,
06086664, 06089508, 06095958, 06096932, 06100516, 06101358,
06101808, 06108730, 06111288, 06118100, 06126818, 06143806,
06149244, 06152970, 06153532, 06165112, 06166810, 06178076,
06186754, 06191774, 06193652, 06230260.

1 COUNT 11: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JON WOODS, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of USA
8 Photocopy and Professional Documents Mgmt. to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which USA Photocopy and Professional Documents Mgmt. was
11 entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to ICW
13 Insurance on the following claims: 10101403114, 101504848,
14 10101504295, 10101400905, 10101407313, 10101509283, 10101512245,
15 10101412144, 10101400968, 10101402291, 10101402114, 10101411337,
16 10101504558, 10101508161, 10101511774, 10101512944, 10101506562,
17 10101511611, 10101512990, 10101501629, 10101404054, 2016007429,
18 2016007858, 10101410383, 2016008653, 10101506726, 10101510045,
19 10101514296, 10101504829, 2016005352, 10101505798, 10101500432,
20 10101411557, 10101500650, 2016006181, 2016008170, 10101502518,
21 10101401017, 2016004080, 2016005582, 2016009421, 2016011276,
22 10101410279, 10101510780, 10101511080, 10101401371, 10101504840,
23 10101403998, 10101412071, 2016003648.

17 ENHANCEMENT(S)

18 It is further alleged pursuant to Penal Code section 186.11(a)
19 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
20 to counts 5, 6, 7, 8, 9, 10 and 11, defendant JON WOODS engaged
21 in a pattern of related fraudulent felony conduct involving the
22 taking of more than five hundred thousand dollars (\$500,000).

23 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11, it is
24 further alleged pursuant to Penal Code section 12022.6(a)(2)
25 (PROPERTY LOSS OVER \$200,000), that JON WOODS intentionally
26 took, damaged, and destroyed property valued in excess of two
27 hundred thousand dollars (\$200,000) during the commission and
28 attempted commission of the above offense.

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

Dated 06-02-2017 at Orange County, California.
NH/AC 17F00384

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: /s/ NOORUL HASAN
NOORUL HASAN, Deputy District Attorney

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

JON WOODS - \$ 500,000.00

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.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1366

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 LIONEL EDUARDO GIRON 05/15/68) OCDA WC12020005
12 C6099212)
13 AKA LEONEL EDUARDO SAMAYOA GIRON)
14 LIONEL E GIRON)
Defendant(s))

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

17 COUNT 1: On or about and between March 01, 2010 and July 01,
18 2015, in violation of Section 182(a)(1) of the Penal Code
19 (CONSPIRACY TO COMMIT A CRIME), a FELONY, LIONEL EDUARDO GIRON
20 did unlawfully conspire together and with another person, whose
21 identity is unknown, to commit the crime of REFERRAL OF CLIENTS
22 FOR COMPENSATION, in violation of Section 3215 of the Labor
Code.

23 It is further alleged that pursuant to and for the purpose of
24 carrying out the objects and purposes of the conspiracy, one and
more of the conspirators committed the following overt acts:

25 OVERT ACT 1

26 Defendant Lionel Giron is an attorney licensed to practice law
27 in the State of California.

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OVERT ACT 2

In or about March of 2010 Defendant Giron's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services until May of 2017.

OVERT ACT 3

On or about March 1, 2010, Defendant Giron contracted with his associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendant Giron agreed to allow Arguello to procure and deliver to him an agreed upon minimum number of retained clients per month for a monthly fee.

OVERT ACT 5

Defendant Giron agreed to permit all clients procured for him by Arguello's joint marketing scheme to be referred to medical providers chosen by Arguello or companies associated with Arguello.

OVERT ACT 6

Defendant Giron agreed to refer his copy service orders to companies owned or controlled by, or affiliated with, his associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between March 1, 2010 and July 1, 2015, Defendant Giron agreed to permit, and permitted, his associate Edgar Gonzalez, the owner of USA Photocopy, to send his copy service employees to Defendant's law firm in order to create work orders for Gonzalez's copy service companies.

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OVERT ACT 8

Defendant Giron allowed Gonzalez's employees access to his client files in order for them to search its contents for any and all entities and locations that may be subpoenaed for records related to the case, and then permitted them to prepare and process work orders without any attorney supervision or approval.

OVERT ACT 9

Between March 1, 2010 and July 1, 2015, Defendant Giron unlawfully permitted Gonzalez and Gonzalez's employees to review subpoenaed records obtained by the copy services in order to find additional locations that may be added to the original work order, and to process the amended work order without any attorney oversight or approval.

OVERT ACT 10

Between May 24, 2010 and March 25, 2015, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$356,855 for attorney copy services rendered in claims where Defendant Giron was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 11

Between April 25, 2014 and June 29, 2015, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$112,207 from insurance companies for attorney copy services rendered in claims where Defendant Giron was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 12

Between October 10, 2011 and June 10, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$429,951 from insurance companies for attorney copy services rendered in claims where Defendant Giron served as the claimant's attorney at anytime during the pendency of the claim.

1 COUNT 2: On or about and between June 06, 2014 and December 01,
2 2014, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, LIONEL EDUARDO GIRON did unlawfully
4 solicit, accept, and refer business to and from Carlos Arguello
5 III's companies, including Centro Legal Int'l, Justicia Legal
6 Int'l, and Centro de Abogado, with the knowledge that, and with
7 reckless disregard for whether Carlos Arguello III's companies,
including Centro Legal Int'l, Justicia Legal Int'l, and Centro
de Abogado intended to violate Penal Code section 550 and
Insurance Code section 1871.4.

8 COUNT 3: On or about and between June 06, 2014 and June 30,
9 2015, in violation of Section 549 of the Penal Code (FALSE AND
10 FRAUDULENT CLAIM), a FELONY, LIONEL EDUARDO GIRON did unlawfully
11 solicit, accept, and refer business to and from USA Photocopy,
12 C&E Technology and Professional Documents Mgmt., with the
13 knowledge that, and with reckless disregard for whether USA
14 Photocopy, C&E Technology and Professional Documents Mgmt.
intended to violate Penal Code section 550 and Insurance Code
section 1871.4.

15 COUNT 4: On or about and between June 06, 2014 and December 01,
16 2014, in violation of Section 549 of the Penal Code (FALSE AND
17 FRAUDULENT CLAIM), a FELONY, LIONEL EDUARDO GIRON did unlawfully
18 solicit, accept, and refer business to and from medical
19 providers selected by Providence Scheduling, with the knowledge
20 that, and with reckless disregard for whether medical providers
selected by Providence Scheduling intended to violate Penal Code
section 550 and Insurance Code section 1871.4.

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1 COUNT 5: On or about and between June 06, 2013 and June 01,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, LIONEL EDUARDO GIRON, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy and Professional Documents Mgmt. to
9 an insurance benefit and payment, and to the amount of a benefit
10 and payment to which USA Photocopy and Professional Documents
11 Mgmt. was entitled, namely: violation of Labor Code 139.32(c) in
12 connection with copy services rendered and billed to Bershire
13 Hathaway Homestate Companies on the following claims: 33047691
14 33056165, 33062085, 22026485, 33055956, 33058492, 33054539,
15 33048636, 33058766, 33056307, 33065731, 44016543.

11 COUNT 6: On or about and between June 05, 2013 and June 01,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, LIONEL EDUARDO GIRON, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy, C&E Technology and Professional
19 Documents Mgmt. to an insurance benefit and payment, and to the
20 amount of a benefit and payment to which USA Photocopy, C&E
21 Technology and Professional Documents Mgmt. was entitled,
22 namely: violation of Labor Code 139.32(c) in connection with
23 copy services rendered and billed to Travelers Insurance on the
24 following claims: EHJ5512, ELW6526, ELW0481, EPH0778, E0B6481,
25 ELW7043, ELW6526, CHP7412, EPH9081, A5X1634, EPH6186, E2F2635,
26 E0B8342, E0B4558, E0B8389, E2F3512, EPH7887, E1G0200, E0B6870,
27 E0B7942, E0B3567, E0B7940.

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1 COUNT 7: On or about and between June 06, 2013 and June 01,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, LIONEL EDUARDO GIRON, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy, C&E Technology and Professional
9 Documents Mgmt. to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which USA Photocopy, C&E
11 Technology and Professional Documents Mgmt. was entitled,
12 namely: violation of Labor Code 139.32(c) in connection with
13 copy services rendered and billed to Zenith Insurance on the
14 following claims: 515119, 595937, 526560, 522098, 598636,
615029, 605507, 607991, 525737, 522077, 583203, 515836, 576833,
516187, 524231, 520511, 537280, 517533, 520511, 526170, 516306,
524685, 521686, 538447, 516901, 527114, 601589, 581796, 541141,
533077, 528094, 533276, 532607, 608215, 515548, 531254, 539829,
530975, 519001, 537477, 592718, 531039, 533090, 609007, 523718,
516609, 614265, 538395, 574262, 538968.

15 COUNT 8: On or about and between June 06, 2013 and June 01,
16 2015, in violation of Section 550(b)(3) of the Penal Code
17 (INSURANCE FRAUD), a FELONY, LIONEL EDUARDO GIRON, with the
18 intent to defraud, did unlawfully conceal and knowingly fail to
19 disclose, and did knowingly assist with another person to
20 conceal and fail to disclose the occurrence of an event and a
21 fact that affected the initial and continued material right and
22 entitlement of USA Photocopy, C&E Technology and Professional
23 Documents Mgmt. to an insurance benefit and payment, and to the
24 amount of a benefit and payment to which USA Photocopy, C&E
25 Technology and Professional Documents Mgmt. was entitled,
26 namely: violation of Labor Code 139.32(c) in connection with
27 copy services rendered and billed to Employers Insurance on the
28 following claims: 2013207797, 2013210927, 2014253538,
2014246154, 2013210991, 2013219257, 2014247938, 2013201900,
2014258478, 2014270298, 2015258097, 2013212907, 2013220061,
2013243209, 2013256438, 2013206448, 2013191750, 2014230217,
2014246896, 2013197821, 2015273468, 2013210592, 2014262810,
2014258138, 2013253593, 2013204553, 2013223178, 2014241776,
2014250255, 2013207161, 2014253057, 2014240700.

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1 COUNT 9: On or about and between June 06, 2013 and June 01,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, LIONEL EDUARDO GIRON, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy, C&E Technology and Professional
9 Documents Mgmt. to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which USA Photocopy, C&E
11 Technology and Professional Documents Mgmt. was entitled,
12 namely: violation of Labor Code 139.32(c) in connection with
13 copy services rendered and billed to Zurich Insurance on on the
14 following claims: 2080303038, 2080306728, 2080298663,
15 2010224168, 2080286798, 2080289880, 2080289880, 2080290775,
16 2080295593, 2080290008, 2080290008, 2080284253, 2080296137,
2010241687, 2080311076, 2010228766, 2080304424, 2010239845,
2080290664, 2080310666, 2080291893, 2080287518, 2080301507,
2080290984, 2080288814, 2010247989, 2080299217, 2010234650,
2080315402, 2010240551, 2080294979, 2080289519, 2080294038,
2080300616, 2010238414, 2080293851, 2080288690, 2080305578,
2080295000, 2010226504, 2080311954, 2080288625, 2080298235,
2010231252, 2010226433, 9370001265, 2080319309, 2080283860,
2080287197, 2080286724.

17 COUNT 10: On or about and between June 06, 2013 and June 01,
18 2015, in violation of Section 550(b)(3) of the Penal Code
19 (INSURANCE FRAUD), a FELONY, LIONEL EDUARDO GIRON, with the
20 intent to defraud, did unlawfully conceal and knowingly fail to
21 disclose, and did knowingly assist with another person to
22 conceal and fail to disclose the occurrence of an event and a
23 fact that affected the initial and continued material right and
24 entitlement of USA Photocopy and Professional Documents Mgmt. to
25 an insurance benefit and payment, and to the amount of a benefit
26 and payment to which USA Photocopy and Professional Documents
27 Mgmt. was entitled, namely: violation of Labor Code 139.32(c) in
28 connection with copy services rendered and billed to State
Compensation Insurance Fund on on the following claims:
05697000, 05959206, 05972740, 05992200, 05993196, 06003268,
06003510, 06043216, 06043962, 06048144.

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1 COUNT 11: On or about and between June 06, 2013 and June 01,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, LIONEL EDUARDO GIRON, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy and Professional Documents
9 Management to an insurance benefit and payment, and to the
10 amount of a benefit and payment to which USA Photocopy and
11 Professional Documents Management was entitled, namely:
12 violation of Labor Code 139.32(c) in connection with copy
13 services rendered and billed to ICW Insurance on on the
14 following claims: 10101303228, 10101300925, 10101305059,
15 10101301250, 10101305114, 10101300141, 10101301492, 10101305091,
16 10101501254, 10101306688, 10101303148, 10101412533, 10101305667,
17 10101300603, 10101400262, 10101307414, 10101303960, 10101308931,
18 10101305277, 10101302014, 10101305040, 10101304398, 10101400747,
19 10101305309, 10101411861, 10101409479, 10101306491, 10101404883,
20 10101300732, 10101302619, 10101304780, 10101310227, 10101306371,
21 10101411685, 10101304800, 10101308068, 10101409694, 10101300731,
22 10101302441, 10101400394.

16 ENHANCEMENT(S)

17 It is further alleged pursuant to Penal Code section 186.11(a)
18 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
19 to counts 5, 6, 7, 8, 9, 10 and 11, defendant LIONEL EDUARDO
20 GIRON engaged in a pattern of related fraudulent felony conduct
21 involving the taking of more than five hundred thousand dollars
22 (\$500,000).

23 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11, it is
24 further alleged pursuant to Penal Code section 12022.6(a)(2)
25 (PROPERTY LOSS OVER \$200,000), that LIONEL EDUARDO GIRON
26 intentionally took, damaged, and destroyed property valued in
27 excess of two hundred thousand dollars (\$200,000) during the
28 commission and attempted commission of the above offense.

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

Dated 06-02-2017 at Orange County, California.
NH/AC 17F00385

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: /s/ NOORUL HASAN
NOORUL HASAN, Deputy District Attorney

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

LIONEL EDUARDO GIRON - \$ 500,000.00

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.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1363

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 PAYMAN ZARGARI 01/09/68) OCDA WC12020005
12 C4894524)
13 Defendant(s))

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

16 COUNT 1: On or about and between June 01, 2011 and June 02,
17 2017, in violation of Section 182(a)(1) of the Penal Code
18 (CONSPIRACY TO COMMIT A CRIME), a FELONY, PAYMAN ZARGARI did
19 unlawfully conspire together and with another person, whose
20 identity is unknown, to commit the crime of Referral of Clients
for Compensation, in violation of Section 3215 of the Labor
Code.

21 It is further alleged that pursuant to and for the purpose of
22 carrying out the objects and purposes of the conspiracy, one and
23 more of the conspirators committed the following overt acts:

24 OVERT ACT 1

25 Defendant Payman Zargari is an attorney licensed to practice law
26 in the State of California.

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OVERT ACT 2

In or about March of 2010 Defendant Zargari's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services until May of 2017.

OVERT ACT 3

On or about June 1, 2011, Defendant Zargari contracted with his associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendant Zargari agreed to allow Arguello to procure and deliver to him an agreed upon minimum number of retained clients per month for a monthly fee.

OVERT ACT 5

Defendant Zargari agreed to permit all clients procured for him by Arguello's joint marketing scheme to be referred to medical providers chosen by Arguello or companies associated with Arguello.

OVERT ACT 6

Defendant Zargari agreed to refer his copy service orders to companies owned or controlled by, or affiliated with, his associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between June 1, 2011 and June 1, 2017, Defendant Zargari agreed to permit, and permitted, his associate Edgar Gonzalez, the owner of USA Photocopy, to send his copy service employees to Defendant's law firm in order to create work orders for Gonzalez's copy service companies

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OVERT ACT 8

Defendant Zargari allowed Gonzalez's employees access to his client files in order for them to search its contents for any and all entities and locations that may be subpoenaed for records related to the case, and then permitted them to prepare and process work orders without any attorney supervision or approval.

OVERT ACT 9

Between June 1, 2011 and June 1, 2017, Defendant Zargari unlawfully permitted Gonzalez and Gonzalez's employees to review subpoenaed records obtained by the copy services in order to find additional locations that may be added to the original work order, and to process the amended work order without any attorney oversight or approval.

OVERT ACT 10

Between June 15, 2011 and May 16, 2017, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$1,316,952 for attorney copy services rendered in claims where Defendant Zargari was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 11

Between April 17, 2015 to May 31, 2017, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$173,003 from insurance companies for attorney copy services rendered in claims where Defendant Zargari was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 12

Between December 14, 2011 and December 13, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$10,911 from insurance companies for attorney copy services rendered in claims where Defendant Zargari served as the claimant's attorney at anytime during the pendency of the claim.

1 COUNT 2: On or about and between June 06, 2014 and June 02,
2 2017, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, PAYMAN ZARGARI did unlawfully
4 solicit, accept, and refer business to and from Carlos Arguello
5 III's companies, including Centro Legal Int'l, Justicia Legal
6 Int'l, with the knowledge that, and with reckless disregard for
7 whether Carlos Arguello III's companies, including Centro Legal
8 Int'l, Justicia Legal Int'l intended to violate Penal Code
9 section 550 and Insurance Code section 1871.4.

10 COUNT 3: On or about and between June 06, 2014 and June 02,
11 2017, in violation of Section 549 of the Penal Code (FALSE AND
12 FRAUDULENT CLAIM), a FELONY, PAYMAN ZARGARI did unlawfully
13 solicit, accept, and refer business to and from USA Photocopy,
14 C&E Technology and Professional Documents Mgmt., with the
15 knowledge that, and with reckless disregard for whether USA
16 Photocopy, C&E Technology and Professional Documents Mgmt.
17 intended to violate Penal Code section 550 and Insurance Code
18 section 1871.4.

19 COUNT 4: On or about and between June 06, 2014 and June 02,
20 2017, in violation of Section 549 of the Penal Code (FALSE AND
21 FRAUDULENT CLAIM), a FELONY, PAYMAN ZARGARI did unlawfully
22 solicit, accept, and refer business to and from medical
23 providers selected by Providence Scheduling, with the knowledge
24 that, and with reckless disregard for whether medical providers
25 selected by Providence Scheduling intended to violate Penal Code
26 section 550 and Insurance Code section 1871.4.

27 COUNT 5: On or about and between June 05, 2014 and October 08,
28 2014, in violation of Section 550(b)(3) of the Penal Code
(INSURANCE FRAUD), a FELONY, PAYMAN ZARGARI, with the intent to
defraud, did unlawfully conceal and knowingly fail to disclose,
and did knowingly assist with another person to conceal and fail
to disclose the occurrence of an event and a fact that affected
the initial and continued material right and entitlement of
Professional Documents Mgmt. to an insurance benefit and
payment, and to the amount of a benefit and payment to which
Professional Documents Mgmt. was entitled, namely: violation of
Labor Code 139.32 (c) in connection with copy services rendered
and billed to Zenith Insurance on claim of Octavis P.

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1 COUNT 6: On or about and between January 01, 2014 and December
2 31, 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, PAYMAN ZARGARI, with the intent to
4 defraud, did unlawfully conceal and knowingly fail to disclose,
5 and did knowingly assist with another person to conceal and fail
6 to disclose the occurrence of an event and a fact that affected
7 the initial and continued material right and entitlement of
8 Professional Documents Mgmt. to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 Professional Documents Mgmt. was entitled, namely: violation of
11 Labor Code 139.32 (c) in connection with copy services rendered
12 and billed to Employers Insurance on claim of Marta G.

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14 COUNT 7: On or about October 02, 2015, in violation of Section
15 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
16 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
17 and accept a rebate, refund, commission, preference, patronage,
18 dividend, discount and other consideration, as compensation and
19 inducement for referring clients and patients to perform and
20 obtain services and benefits to wit payment of \$30,000 to Carlos
21 Arguello III's marketing scheme for procurement of clients.

22
23 COUNT 8: On or about October 30, 2015, in violation of Section
24 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
25 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
26 and accept a rebate, refund, commission, preference, patronage,
27 dividend, discount and other consideration, as compensation and
28 inducement for referring clients and patients to perform and
obtain services and benefits to wit payment of \$30,000 to Carlos
Arguello III's marketing scheme for procurement of clients.

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30 COUNT 9: On or about November 04, 2015, in violation of Section
31 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
32 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
33 and accept a rebate, refund, commission, preference, patronage,
34 dividend, discount and other consideration, as compensation and
35 inducement for referring clients and patients to perform and
36 obtain services and benefits to wit payment of \$30,000 to Carlos
37 Arguello III's marketing scheme for procurement of clients.

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1 COUNT 10: On or about November 25, 2015, in violation of Section
2 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
3 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
4 and accept a rebate, refund, commission, preference, patronage,
5 dividend, discount and other consideration, as compensation and
6 inducement for referring clients and patients to perform and
obtain services and benefits to wit payment of \$30,000 to Carlos
Arguello III's marketing scheme for procurement of clients.

7 COUNT 11: On or about January 15, 2016, in violation of Section
8 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
9 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
10 and accept a rebate, refund, commission, preference, patronage,
11 dividend, discount and other consideration, as compensation and
12 inducement for referring clients and patients to perform and
obtain services and benefits to wit payment of \$30,000 to Carlos
Arguello III's marketing scheme for procurement of clients.

13 COUNT 12: On or about July 01, 2016, in violation of Section
14 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
15 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
16 and accept a rebate, refund, commission, preference, patronage,
17 dividend, discount and other consideration, as compensation and
18 inducement for referring clients and patients to perform and
obtain services and benefits to wit payment of \$25,000 to Carlos
Arguello III's marketing scheme for procurement of clients.

19 COUNT 13: On or about August 12, 2016, in violation of Section
20 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
21 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
22 and accept a rebate, refund, commission, preference, patronage,
23 dividend, discount and other consideration, as compensation and
24 inducement for referring clients and patients to perform and
obtain services and benefits to wit payment of \$50,000 to Carlos
Arguello III's marketing scheme for procurement of clients.

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1 COUNT 14: On or about September 09, 2016, in violation of
2 Section 3215 of the Labor Code (REFERRAL OF CLIENTS FOR
3 COMPENSATION), a FELONY, PAYMAN ZARGARI did unlawfully offer,
4 deliver, receive, and accept a rebate, refund, commission,
5 preference, patronage, dividend, discount and other
6 consideration, as compensation and inducement for referring
7 clients and patients to perform and obtain services and benefits
8 to wit payment of \$50,000 to Carlos Arguello III's marketing
9 scheme for procurement of clients.

10 COUNT 15: On or about October 05, 2016, in violation of Section
11 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
12 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
13 and accept a rebate, refund, commission, preference, patronage,
14 dividend, discount and other consideration, as compensation and
15 inducement for referring clients and patients to perform and
16 obtain services and benefits to wit payment of \$50,000 to Carlos
17 Arguello III's marketing scheme for procurement of clients.

18 COUNT 16: On or about November 03, 2016, in violation of Section
19 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
20 FELONY, PAYMAN ZARGARI did unlawfully offer, deliver, receive,
21 and accept a rebate, refund, commission, preference, patronage,
22 dividend, discount and other consideration, as compensation and
23 inducement for referring clients and patients to perform and
24 obtain services and benefits to wit payment of \$50,000 to Carlos
25 Arguello III's marketing scheme for procurement of clients.

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ENHANCEMENT(S)

As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15
and 16, it is further alleged pursuant to Penal Code section
12022.6(a)(2) (PROPERTY LOSS OVER \$200,000), that PAYMAN ZARGARI
intentionally took, damaged, and destroyed property valued in
excess of two hundred thousand dollars (\$200,000) during the
commission and attempted commission of the above offense.

It is further alleged pursuant to Penal Code section 186.11(a)
(1)/(3) (AGGRAVATED WHITE COLLAR CRIME - OVER \$100,000), that as
to counts 5 and 6, defendant PAYMAN ZARGARI engaged in a pattern
of related fraudulent felony conduct involving the taking of
more than one hundred thousand dollars (\$100,000) but less than
five hundred thousand dollars (\$500,000).

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

Dated 06-02-2017 at Orange County, California.
NH/AC 17F00391

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: /s/ NOORUL HASAN
NOORUL HASAN, Deputy District Attorney

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

PAYMAN ZARGARI - \$ 500,000.00

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.

Pursuant to Welfare & Institutions Code §827 and California Rule
of Court 5.552, notice is hereby given that the People will seek
a court order to disseminate the juvenile case file of the
defendant/minor, if any exists, to all parties in this action,
through their respective attorneys of record, in the prosecution
of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1362

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 ROBIN REBECCA JACOBS 12/05/64) OCDA WC12020005
12 B4094077)
13 AKA ROBIN JACOBS)
14 ROBIN R JACOBS)
Defendant(s))

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

17 COUNT 1: On or about and between March 01, 2010 and July 31,
18 2015, in violation of Section 182(a)(1) of the Penal Code
19 (CONSPIRACY TO COMMIT A CRIME), a FELONY, ROBIN REBECCA JACOBS
20 did unlawfully conspire together and with another person, whose
21 identity is unknown, to commit the crime of Referral of Clients
22 for Compensation, in violation of Section 3215 of the Labor
Code.

23 It is further alleged that pursuant to and for the purpose of
24 carrying out the objects and purposes of the conspiracy, one and
more of the conspirators committed the following overt acts:

25 OVERT ACT 1

26 Defendant Robin Jacobs is an attorney licensed to practice law
27 in the State of California.
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OVERT ACT 2

In or about March of 2010 Defendant Jacobs's associate Carlos Arguello III created an attorney marketing scheme and proceeded to secure contracts with 20 to 40 workers' compensation and personal injury attorneys for his marketing services through May of 2017.

OVERT ACT 3

On or about March 1, 2010, Defendant Jacobs contracted with her associate Arguello to participate in the attorney marketing scheme.

OVERT ACT 4

Defendant Jacobs agreed to allow Arguello to procure and deliver to her an agreed upon minimum number of retained clients per month for a monthly fee.

OVERT ACT 5

Defendant Jacobs agreed to permit all clients procured for her by Arguello's joint marketing scheme to be referred to medical providers chosen by Arguello or companies associated with Arguello.

OVERT ACT 6

Defendant Jacobs agreed to refer her copy service orders to companies owned or controlled by, or affiliated with, her associates Arguello and Edgar Gonzalez, including C & E Technology, USA Photocopy and Professional Documents Management.

OVERT ACT 7

Between March 2010 and July 1, 2015, Defendant Jacobs agreed to permit, and permitted, her associate Edgar Gonzalez, the owner of USA Photocopy, to send his copy service employees to Defendant's law firm in order to create work orders for Gonzalez's copy service companies.

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OVERT ACT 8

Defendant Jacobs allowed Gonzalez's employees access to her client files in order for them to search its contents for any and all entities and locations that may be subpoenaed for records related to the case, and then permitted them to prepare and process work orders without any attorney supervision or approval.

OVERT ACT 9

Between March 2011 and July 1, 2015, Defendant Jacobs unlawfully permitted Gonzalez and Gonzalez's employees to review subpoenaed records obtained by the copy services in order to find additional locations that may be added to the original work order, and to process the amended work order without any attorney oversight or approval.

OVERT ACT 10

Between December 6, 2010 to July 31, 2015, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$407,333 for attorney copy services rendered in claims where Defendant Jacobs was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 11

Between April 22, 2014 and July 30, 2015, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$702,027 from insurance companies for attorney copy services rendered in claims where Defendant Jacobs was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 12

Between October 11, 2011 and July 27, 2015, C & E Technology filed liens with the Workers' Compensation Appeals Board (WCAB), seeking payment of \$441,768 from insurance companies for attorney copy services rendered in claims where Defendant Jacobs served as the claimant's attorney at anytime during the pendency of the claim.

1 COUNT 2: On or about and between June 01, 2014 and August 01,
2 2015, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, ROBIN REBECCA JACOBS did unlawfully
4 solicit, accept, and refer business to and from USA Photocopy,
5 C&E Technology and Professional Documents Mgmt., with the
6 knowledge that, and with reckless disregard for whether USA
7 Photocopy, C&E Technology and Professional Documents Mgmt.
8 intended to violate Penal Code section 550 and Insurance Code
9 section 1871.4.

10 COUNT 3: On or about and between February 09, 2014 and June 11,
11 2015, in violation of Section 550(b)(3) of the Penal Code
12 (INSURANCE FRAUD), a FELONY, ROBIN REBECCA JACOBS, with the
13 intent to defraud, did unlawfully conceal and knowingly fail to
14 disclose, and did knowingly assist with another person to
15 conceal and fail to disclose the occurrence of an event and a
16 fact that affected the initial and continued material right and
17 entitlement of Professional Documents Mgmt. to an insurance
18 benefit and payment, and to the amount of a benefit and payment
19 to which Professional Documents Mgmt. was entitled, namely:
20 violation of Labor Code 139.32 (c) in connection with copy
21 services rendered and billed to Matrix Insurance on claim of
22 Jova B.

23 COUNT 4: On or about and between January 01, 2014 and December
24 31, 2014, in violation of Section 550(b)(3) of the Penal Code
25 (INSURANCE FRAUD), a FELONY, ROBIN REBECCA JACOBS, with the
26 intent to defraud, did unlawfully conceal and knowingly fail to
27 disclose, and did knowingly assist with another person to
28 conceal and fail to disclose the occurrence of an event and a
fact that affected the initial and continued material right and
entitlement of Professional Documents Mgmt. to an insurance
benefit and payment, and to the amount of a benefit and payment
to which Professional Documents Mgmt. was entitled, namely:
violation of Labor Code 139.32 (c) in connection with copy
services rendered and billed to Hartford Insurance on claim of
Jose S.

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

Dated 06-02-2017 at Orange County, California.
NH/AC 17F00392

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: /s/ NOORUL HASAN
NOORUL HASAN, Deputy District Attorney

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

ROBIN REBECCA JACOBS - \$ 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.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/05/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF1369

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11) OCDA WC12020005
12 ROBERT IRVING SLATER 11/24/49)
13 N5593892)
14 AKA ROBERT SLATER)
Defendant(s)

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

17 COUNT 1: On or about and between August 01, 2011 and June 02,
18 2017, in violation of Section 182(a)(1) of the Penal Code
19 (CONSPIRACY TO COMMIT A CRIME), a FELONY, ROBERT IRVING SLATER
20 did unlawfully conspire together and with another person, whose
21 identity is unknown, to commit the crime of REFERRAL OF CLIENTS
FOR COMPENSATION, in violation of Section 3215 of the Labor
Code.

22 It is further alleged that pursuant to and for the purpose of
23 carrying out the objects and purposes of the conspiracy, one and
24 more of the conspirators committed the following overt acts:

25 OVERT ACT 1

26 Defendant Robert Slater is an attorney licensed to practice law
27 in the State of California.

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OVERT ACT 2

Between August 2011 and May 1, 2017, Defendant Slater unlawfully accepted and received approximately \$172,500 by his associate Edgar Gonzalez, owner of USA Photocopy Service, by way of Gonzalez paying for monthly sign-up services provided for Defendant's law practice by Peter Anthony Ayala, as an incentive and consideration for continued referral of business to Gonzalez's copy service company.

OVERT ACT 3

Between September 1, 2011 and May 15, 2017, USA Photocopy filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment from insurance companies of \$508,889 for attorney copy services rendered in claims where Defendant Slater was the claimant's attorney at anytime during the pendency of the claim.

OVERT ACT 4

Between October 17, 2014 and July 28, 2016, Professional Documents Management filed liens with the Workers' Compensation Appeals Board (WCAB) to demand payment of \$17,213 from insurance companies for attorney copy services rendered in claims where Defendant Slater was the claimant's attorney at anytime during the pendency of the claim.

COUNT 2: On or about and between June 06, 2014 and May 31, 2017, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, ROBERT IRVING SLATER did unlawfully solicit, accept, and refer business to and from USA Photocopy and Professional Documents Mgmt., with the knowledge that, and with reckless disregard for whether USA Photocopy and Professional Documents Mgmt. intended to violate Penal Code section 550 and Insurance Code section 1871.4.

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1 COUNT 3: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which USA
10 Photocopy was entitled, namely: violation of Labor Code 139.32
11 (c) connection with copy services rendered and billed to
12 Berkshire Hathaway Homestate Companies on the following
13 claims: 33050838, 22024646, 33056202, 33076792, 33053004,
14 55055693, 33075779, 33072233, 33055196, 33055580, 44025096,
15 33065284, 33063027, 33069348.

11 COUNT 4: On or about and between January 01, 2014 and May 26,
12 2017, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of USA Photocopy to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which USA
20 Photocopy was entitled, namely: violation of Labor Code 139.32
21 (c) connection with copy services rendered and billed to
22 Travelers Insurance on the following claims: A4Z4155, EPH0738,
23 ELW5989, E0B4185, EPH7354, E2F1115, E2F1978, E0B0980, ELW4031.

21 COUNT 5: On or about and between January 01, 2014 and May 26,
22 2017, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of USA Photocopy to an insurance benefit and
payment, and to the amount of a benefit and payment to which USA
Photocopy was entitled, namely: violation of Labor Code 139.32
(c) Zenith Insurance on the following claims: 690399, 685585,
692771, 694075.

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1 COUNT 6: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which USA
10 Photocopy was entitled, namely: violation of Labor Code 139.32
11 (c) connection with copy services rendered and billed to
Employers Insurance on the following claims: 2014265698,
2014231064, 2016308586, 2014253002, 2014304010, 2015259209,
2014242294, 2014242682, 2014247352, 2014253217, 2014242649,
2015262483, 2014316961, 2015283569, 2015260641, 2014236080,
2014245010.

12 COUNT 7: On or about and between January 01, 2014 and May 26,
13 2017, in violation of Section 550(b)(3) of the Penal Code
14 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
15 intent to defraud, did unlawfully conceal and knowingly fail to
16 disclose, and did knowingly assist with another person to
17 conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of USA Photocopy to an insurance benefit and
20 payment, and to the amount of a benefit and payment to which USA
21 Photocopy was entitled, namely: violation of Labor Code 139.32
22 (c) connection with copy services rendered and billed to Zurich
23 Insurance on the following claims: 2080299196, 2080318767,
2080322414, 2080300623, 2010256975, 2080319552, 2080300094,
2080318722, 2080324217, 2010257746, 2080321232, 2080327425,
2080313873, 2080325991, 2080329303, 2080342969, 2080304582,
2080327926, 2080331669, 2080342981, 2080336868, 2010271512,
2010286357, 2080308333.

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1 COUNT 8: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which USA
Photocopy was entitled, namely: violation of Labor Code 139.32
(c) connection with copy services rendered and billed to State
Compensation Insurance Fund on the following claims: 05719128,
06035758, 06124834, 06146938, 06187754.

10 COUNT 9: On or about and between January 01, 2014 and May 26,
11 2017, in violation of Section 550(b)(3) of the Penal Code
12 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
13 intent to defraud, did unlawfully conceal and knowingly fail to
14 disclose, and did knowingly assist with another person to
15 conceal and fail to disclose the occurrence of an event and a
16 fact that affected the initial and continued material right and
17 entitlement of USA Photocopy to an insurance benefit and
18 payment, and to the amount of a benefit and payment to which USA
19 Photocopy was entitled, namely: violation of Labor Code 139.32
20 (c) connection with copy services rendered and billed to ICW
Insurance on the following claims: 10101411944, 10101515937,
10101515576, 10101516094, 10101411566, 10101510832, 10101411421,
2016004437, 2016018065, 10101505217, 10101515923, 10101515998,
10101516048, 10101507170, 10101500752, 10101409962, 10101501381,
10101509839, 2016002373.

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1 COUNT 10: On or about and between January 01, 2014 and May 26,
2 2017, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, ROBERT IRVING SLATER, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of USA Photocopy and Professional Documents Mgmt. to
9 an insurance benefit and payment, and to the amount of a benefit
10 and payment to which USA Photocopy and Professional Documents
11 Mgmt. was entitled, namely: violation of Labor Code 139.32(c)
12 connection with copy services rendered and billed to The
13 Hartford on the following claims: YMHC78765, YMQC36912,
14 YMQC36912, YMQC37258.

11 COUNT 11: On or about and between June 06, 2014 and May 31,
12 2017, in violation of Section 3215 of the Labor Code (REFERRAL
13 OF CLIENTS FOR COMPENSATION), a FELONY, ROBERT IRVING SLATER did
14 unlawfully offer, deliver, receive, and accept a rebate, refund,
15 commission, preference, patronage, dividend, discount and other
16 consideration, as compensation and inducement for referring
17 clients and patients to perform and obtain services and benefits
18 to wit: payments by Edgar Gonzalez of approximately \$195,000 to
19 Peter Ayala for sign-up services rendered for defendant's law
20 practice.

18 ENHANCEMENT(S)

19 It is further alleged pursuant to Penal Code section 186.11(a)
20 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
21 to counts 3, 4, 5, 6, 7, 8, 9 and 10, defendant ROBERT IRVING
22 SLATER engaged in a pattern of related fraudulent felony conduct
23 involving the taking of more than five hundred thousand dollars
24 (\$500,000).

24 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11, it is
25 further alleged pursuant to Penal Code section 12022.6(a)(2)
26 (PROPERTY LOSS OVER \$200,000), that ROBERT IRVING SLATER
27 intentionally took, damaged, and destroyed property valued in
28 excess of two hundred thousand dollars (\$200,000) during the
commission and attempted commission of the above offense.

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

Dated 06-02-2017 at Orange County, California.
NH/AC 17F00383

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: /s/ NOORUL HASAN
NOORUL HASAN, Deputy District Attorney

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

ROBERT IRVING SLATER - \$ 500,000.00

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.

Pursuant to Welfare & Institutions Code §827 and California Rule
of Court 5.552, notice is hereby given that the People will seek
a court order to disseminate the juvenile case file of the
defendant/minor, if any exists, to all parties in this action,
through their respective attorneys of record, in the prosecution
of this case.

Alex Padilla
California Secretary of State

Business Search - Entity Detail

The California Business Search is updated daily and reflects work processed through Thursday, February 14, 2019. Please refer to document [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity. Not all images are available online.

C3249674 C & E TECHNOLOGY

Registration Date:	08/20/2010
Jurisdiction:	CALIFORNIA
Entity Type:	DOMESTIC STOCK
Status:	DISSOLVED
Agent for Service of Process:	JAIRO PEREZ 1432 E 17TH ST SANTA ANA CA 92705
Entity Address:	700 E FIRST ST STE 2 SANTA ANA CA 92781
Entity Mailing Address:	700 E FIRST ST STE 2 SANTA ANA CA 92781

Document Type	↕	File Date	↕	PDF
DISSOLUTION		05/25/2017		
SI-NO CHANGE		04/18/2017		
SI-COMPLETE		08/06/2012		
REGISTRATION		08/20/2010		

* Indicates the information is not contained in the California Secretary of State's database.

- If the status of the corporation is "Surrender," the agent for service of process is automatically revoked. Please refer to California Corporations Code [section 2114](#) for information relating to service upon corporations that have surrendered.
- For information on checking or reserving a name, refer to [Name Availability](#).
- If the image is not available online, for information on ordering a copy refer to [Information Requests](#).
- For information on ordering certificates, status reports, certified copies of documents and copies of documents not currently available in the Business Search or to request a more extensive search for records, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Frequently Asked Questions](#).

[Modify Search](#)

[New Search](#)

[Back to Search Results](#)

EXHIBIT 4

AUG 20 2010

ARTICLES OF INCORPORATION

OF

C & E TECHNOLOGY

1. The name of this corporation is C & E TECHNOLOGY.
2. The purpose of this corporation is to engage in any lawful act or activity for which a corporation may be organized under the General Corporation Law of California, other than the banking business, the trust company business, or the practice of a profession permitted to be incorporated by the California Corporation Code.
3. The name and address in the State of California of this corporation's initial agent for service of process is:

JAIRO PEREZ
 1570 E 17TH ST SUITE E
 SANTA ANA, CA 92705

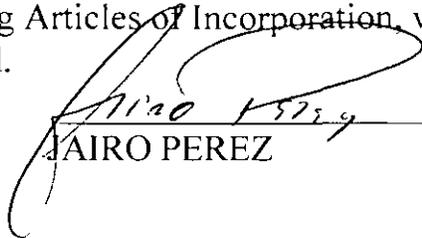
4. This corporation is authorized to issue only one class of shares of stock, and the total number of shares, which this corporation is authorized to issue, is 100,000.

Dated: August 19, 2010



 JAIRO PEREZ, INCORPORATOR

I hereby declare that I am the person who executed the foregoing Articles of Incorporation, which execution is my act and deed.



 JAIRO PEREZ

EXHIBIT 5



**State of California
Secretary of State**

S

12-687909

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)
FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FILED
in the office of the Secretary of State
of the State of California

AUG 06 2012

1. CORPORATE NAME

C & E TECHNOLOGY

2. CALIFORNIA CORPORATE NUMBER

3249674

NIF DC

This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 17.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
700 E FIRST ST SUITE 2	SANTA ANA	CA	92781
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
700 E FIRST ST SUITE 2	SANTA ANA	CA	92781
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE
700 E FIRST ST SUITE 2	SANTA ANA	CA	92781

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7. CHIEF EXECUTIVE OFFICER/ TANIA ARGUELLO	ADDRESS	CITY	STATE	ZIP CODE
	700 E FIRST ST SUITE 2	SANTA ANA		92781
8. SECRETARY TANIA ARGUELLO	ADDRESS	CITY	STATE	ZIP CODE
	700 E FIRST ST SUITE 2	SANTA ANA		92781
9. CHIEF FINANCIAL OFFICER/ TANIA ARGUELLO	ADDRESS	CITY	STATE	ZIP CODE
	700 E FIRST ST SUITE 2	SANTA ANA		92781

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.)

10. NAME TANIA ARGUELLO	ADDRESS	CITY	STATE	ZIP CODE
	700 E FIRST ST SUITE 2	SANTA ANA		92781
11. NAME TANIA ARGUELLO	ADDRESS	CITY	STATE	ZIP CODE
	700 E FIRST ST SUITE 2	SANTA ANA		92781
12. NAME TANIA ARGUELLO	ADDRESS	CITY	STATE	ZIP CODE
	700 E FIRST ST SUITE 2	SANTA ANA		92781

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY: **0**

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 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 California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS

JAIRO PEREZ E.A.

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL

1432 E 17TH ST SANTA ANA CA 92705

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
PROCESSING LEGAL DOCUMENTS

17. 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.

7/27/12
DATE

TANIA ARGUELLO
TYPE/PRINT NAME OF PERSON COMPLETING FORM

PRESIDENT
TITLE

Tania Arguello
SIGNATURE

EXHIBIT 6



State of California Secretary of State

S

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. CORPORATE NAME

2. CALIFORNIA CORPORATE NUMBER

This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. **If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.**

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to **Item 17**.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY STATE ZIP CODE

5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY CITY STATE ZIP CODE

6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4 CITY STATE ZIP CODE

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7. CHIEF EXECUTIVE OFFICER/ ADDRESS CITY STATE ZIP CODE

8. SECRETARY ADDRESS CITY STATE ZIP CODE

9. CHIEF FINANCIAL OFFICER/ ADDRESS CITY STATE ZIP CODE

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.)

10. NAME ADDRESS CITY STATE ZIP CODE

11. NAME ADDRESS CITY STATE ZIP CODE

12. NAME ADDRESS CITY STATE ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 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 California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION

17. 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.

DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

EXHIBIT 7



Secretary of State
Certificate of Dissolution
(California Stock Corporation ONLY)

DISS STK

WN
FILED
Secretary of State
State of California

MAY 25 2017 *WJMY*

IMPORTANT — Read Instructions before completing this form.

There is No Fee for filing a Certificate of Dissolution - Stock

Copy Fees – First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00 plus copy fees

This Space For Office Use Only

1. Corporate Name (Enter the exact name of the Corporation as it is recorded with the California Secretary of State.)

C&E Technology

2. 7-Digit Secretary of State File Number

C3249674

3. Election

The dissolution was made by a vote of **ALL** of the shareholders of the California corporation.

Note: If the above box is not checked, a **Certificate of Election to Wind Up and Dissolve** (Form ELEC STK) must be filed prior to or together with this Certificate of Dissolution. (California Corporations Code section 1901.)

4. Debts and Liabilities (Check the applicable statement. Only **one** box may be checked. If second box is checked, must include the required information in an attachment.)

The known debts and liabilities have been actually paid or paid as far as its assets permitted.

The known debts and liabilities have been adequately provided for in full or as far as its assets permitted by their assumption. Included in the **attachment** to this certificate, incorporated herein by this reference, is a description of the provisions made and the name and address of the person, corporation or government agency that has assumed or guaranteed the payment, or the depository institution with which deposit has been made.

The corporation never incurred any known debts or liabilities.

5. Required Statements (Do not alter the Required Statements – **ALL** must be true to file Form DISS STK.)

- a. The Corporation has been completely wound up and is dissolved.
- b. All final returns required under the California Revenue and Taxation Code have been or will be filed with the California Franchise Tax Board.
- c. The known assets have been distributed to the persons entitled thereto or the corporation acquired no known assets.

6. Read, Verify, Date and Sign Below (See Instructions for signature requirements.)

The undersigned is the sole director or a majority of the directors now in office. I declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of my own knowledge.

5/19/2017

Date

Signature

Edgar Gonzalez

Type or Print Name

Date

Signature

Type or Print Name

Date

Signature

Type or Print Name

EXHIBIT 8

Case Summary

Case Number: 17CF1372

OC Pay Number: 9171101

Originating Court: Central

Defendant: Arguello, Tania

Demographics:

Eyes: Brown

Hair: Brown

Height(ft/in) : 5'1"

Weight (lbs): 110

Names:

Last Name	First Name	Middle Name	Type
Arguello	Tania		Real Name
Plascencia	Tania		Alias
Arguello Plascencia	Tania		Alias

Case Status:

Status: Open
Case Stage:
Release Status: Released on Own Recognizance
Warrant: N
DMV Hold : N
Charging Document: Complaint
Mandatory Appearance: Y
Owner's Resp: N
Amendment #: 0

Counts:

Seq	S/A	Violation Date	Section Statute	OL	Violation	Plea	Plea Date	Disposition	Disposition Date
1	0	03/01/2010	182(a)(1) PC	F	Conspire to commit a crime	NOT GUILTY	06/07/2017		
1	1	03/01/2010	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017		
20	0	10/01/2011	3215 LC	F	Referral of clients or patients for compensation	GUILTY	08/21/2018	Pled Guilty	08/21/2018

Co Defendants:

Last Name	First Name	Release Status	Status Date
Arguello	Carlos	Released on Own Recognizance	10/24/2018
Dadiomov	Boris	Released on Bond	06/07/2017
Castro	Soraida	Released on Bond	06/07/2017
Gallegos	Dulce	Released on Own Recognizance	02/01/2019

Participants:

Role	Badge Agency	Name	Vacation Start	Vacation End
Retained Attorney	RETAT	Corrigan, Katherine		
Retained Attorney	RETAT	Welbourn, Thomas Edward		
District Attorney	OCDA	Hasan, Noorul		

Scheduled Hearing:

Date	Hearing Type - Reason	Courtroom
03/15/2019	Sentencing -	C48

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing	Result
06/07/2017	Arraignment -	C55	Heard	10 court days	
07/28/2017	Pre Trial -	C55	Heard		
10/13/2017	Pre Trial -	C55	Heard	Reasonable Time Waiver	
12/08/2017	Pre Trial -	C55	Heard		
03/09/2018	Pre Trial -	C55	Heard		
06/15/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver	
08/21/2018	Pre Trial -	C48	Heard	waives statutory time for	
09/07/2018	Pre Trial -	C55	Cancel		
10/24/2018	Sentencing -	C48	Heard	waives statutory time for	
02/01/2019	Sentencing -	C48	Cancel		

Bond:

Bail Date	Post Amount	Bondsman	Bondsman Address	Surety	Surety Address	Action	Action Date	Amount
06/07/2017	100000.0	Bail Bond Professionals	null	International Fidelity Insurance Company	null	Active	06/07/2017	100000
						Exonerated	08/21/2018	100000

Case Summary

Case Number: 17CF1364

OC Pay Number: 9170406

Originating Court: Central

Defendant: Gonzalez, Edgar

Demographics:

Eyes: Black

Hair: Black

Height(ft/in) : 6'1"

Weight (lbs): 270

Names:

Last Name First Name Middle Name Type

Gonzalez Edgar Alias

Gonzalez Edgar Real Name

Case Status:

Status: Open

Case Stage:

Release Status: Released on Bond

Warrant: N

DMV Hold : N

Charging Document: Complaint

Mandatory Appearance: Y

Owner's Resp: N

Amendment #: 1

Counts:

Seq	S/A	Violation Date	Section Statute	OL	Violation	Plea	Plea Date	Disposition	Disposition Date
1	0	03/01/2010	182(a)(1) PC	F	Conspire to commit a crime	NOT GUILTY	05/01/2018		
1	1	03/01/2010	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018		
2	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018		
2	1	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018		
2	2	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018		
3	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018		
3	1	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018		
3	2	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018		
4	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018		
4	1	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018		
4	2	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018		
5	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018		
5	1	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018		
5	2	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018		
6	0	09/01/2016	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018		
6	1	09/01/2016	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018		
6	2	09/01/2016	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018		
7	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018		
7	1	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018		
7	2	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018		
8	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018		
8	1	06/01/2013	186.11(a)	F	ENH-Aggravated white collar crime over	DENIED	05/01/2018		

			(1)/(2) PC		\$500k		
8	2	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018
9	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018
9	1	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018
9	2	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018
10	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018
10	1	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	05/01/2018
10	2	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	05/01/2018
11	0	07/01/2017	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/01/2018
11	1	07/01/2017	12022.1(b) PC	F	ENH-Secondary offense committed while released from custody	DENIED	05/01/2018

Participants:

Role	Badge Agency	Name	Vacation Start	Vacation End
Retained Attorney	RETAT	Ciulla, Salvatore		
Retained Attorney	RETAT	Brower, Ronald G.		
District Attorney	OCDA	Hasan, Noorul		
Retained Attorney	RETAT	Rivera, Gabriela C		

Scheduled Hearing:

Date	Hearing Type - Reason	Courtroom
04/03/2019	Preliminary Hearing -	C55

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing Result
06/06/2017	Arraignment -	C55	Heard	10 court/60 calendar days
08/31/2017	Pre Trial -	C55	Heard	Reasonable Time Waiver
10/03/2017	Pre Trial -	C55	Heard	Reasonable Time Waiver
11/14/2017	Pre Trial -	C55	Heard	
12/07/2017	Pre Trial -	C55	Heard	
01/08/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
02/13/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
03/20/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
05/01/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
06/18/2018	Pre Trial -	C55	Heard	
08/20/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
08/20/2018	Pre Trial -	C55	Heard	Waives arraignment today
10/23/2018	Pre Trial -	C55	Heard	

Bond:

Bail Date	Post Amount	Bondsman	Bondsman Address	Surety	Surety Address	Action	Action Date	Amount
06/06/2017	500000.0	Josh Herman Bail Bonds	null	American Contractors Indemnity Co.	null	Active	06/06/2017	500000

Case Summary

Case Number: 17CF1372

OC Pay Number: 9171102

Originating Court: Central

Defendant: Arguello, Carlos

Demographics:

Eyes: Brown

Hair: Brown

Height(ft/in) : 5'7"

Weight (lbs): 170

Names:

Last Name	First Name	Middle Name	Type
Arguello	Carlos		Real Name
Arguello	Carlos		Court True Name

Case Status:

Status: Open
 Case Stage:
 Release Status: Released on Own Recognizance
 Warrant: N
 DMV Hold : N
 Charging Document: Complaint
 Mandatory Appearance: Y
 Owner's Resp: N
 Amendment #: 0

Counts:

Seq	S/A	Violation Date	Section Statute	OL	Violation	Plea	Plea Date	Disposition	Disposition Date
1	0	03/01/2010	182(a)(1) PC	F	Conspire to commit a crime	GUILTY	08/21/2018	Pled Guilty	08/21/2018
1	1	03/01/2010	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
2	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
2	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
2	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
3	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
3	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
3	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
4	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
4	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
4	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
5	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
5	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
5	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
6	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
6	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
6	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
7	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
7	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
7	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
8	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
8	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
8	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
9	0	06/04/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
9	1	06/04/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
9	2	06/04/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018

		PC	\$500k						
10	0	09/01/2016	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
10	1	09/01/2016	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
10	2	09/01/2016	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
11	0	09/01/2016	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
11	1	09/01/2016	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
11	2	09/01/2016	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
12	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
12	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
12	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
13	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
13	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
13	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
14	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
14	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
14	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
15	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
15	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
15	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
16	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
16	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
16	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
17	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
17	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
17	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
18	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
18	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
18	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018
19	0	06/01/2013	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	GUILTY	08/21/2018	Pled Guilty	08/21/2018
19	1	06/01/2013	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017	Dismissed	08/21/2018
19	2	06/01/2013	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	ADMITTED	08/21/2018	Admission	08/21/2018

Co Defendants:

Last Name	First Name	Release Status	Status Date
Dadiomov	Boris	Released on Bond	06/07/2017
Castro	Soraida	Released on Bond	06/07/2017
Arguello	Tania	Released on Own Recognizance	10/24/2018
Gallegos	Dulce	Released on Own Recognizance	02/01/2019

Participants:

Role	Badge Agency	Name	Vacation Start	Vacation End
Retained Attorney	RETAT	Corrigan, Katherine		
Retained Attorney	RETAT	Geller, Marc B.		
District Attorney	OCDA	Hasan, Noorul		

Scheduled Hearing:

Date	Hearing Type - Reason	Courtroom
03/15/2019	Sentencing -	C48

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing Result
06/07/2017	Arraignment -	C55	Heard	10 court days
07/28/2017	Pre Trial -	C55	Heard	
10/13/2017	Pre Trial -	C55	Heard	Reasonable Time Waiver
12/08/2017	Pre Trial -	C55	Heard	
03/09/2018	Pre Trial -	C55	Heard	

06/15/2018 Pre Trial -	C55	Heard	Reasonable Time Waiver
08/21/2018 Pre Trial -	C48	Heard	waives statutory time for
09/07/2018 Pre Trial -	C55	Cancel	
10/24/2018 Sentencing -	C48	Heard	waives statutory time for
02/01/2019 Sentencing -	C48	Cancel	

Bond:

Bail Date	Post Amount	Bondsman	Bondsman Address	Surety	Surety Address	Details		
						Action	Action Date	Amount
06/07/2017	300000.0	Bail Bond Professionals	null	International Fidelity Insurance Company	null	Active	06/07/2017	300000
						Exonerated	08/21/2018	300000

Case Summary

Case Number: 17CF1372

OC Pay Number: 9171103

Originating Court: Central

Defendant: Gallegos, Dulce

Demographics:

Eyes: Brown

Hair: Brown

Height(ft/in) : 5'4"

Weight (lbs): 135

Names:

Last Name	First Name	Middle Name	Type
Gallegos	Dulce		Real Name
Gallegos	Dulce	Carolina	Alias

Case Status:

Status: Open
Case Stage:
Release Status: Released on Own Recognizance
Warrant: N
DMV Hold : N
Charging Document: Complaint
Mandatory Appearance: Y
Owner's Resp: N
Amendment #: 0

Counts:

Seq	S/A	Violation Date	Section Statute	OL	Violation	Plea	Plea Date	Disposition	Disposition Date
1	0	03/01/2010	182(a)(1) PC	F	Conspire to commit a crime	NOT GUILTY	06/07/2017		
20	0	10/01/2011	3215 LC	F	Referral of clients or patients for compensation	GUILTY	08/02/2018	Pled Guilty	08/02/2018

Co Defendants:

Last Name	First Name	Release Status	Status Date
Arguello	Carlos	Released on Own Recognizance	10/24/2018
Dadiomov	Boris	Released on Bond	06/07/2017
Castro	Soraida	Released on Bond	06/07/2017
Arguello	Tania	Released on Own Recognizance	10/24/2018

Participants:

Role	Badge Agency	Name	Vacation Start	Vacation End
District Attorney	OCDA	Hasan, Noorul		
District Attorney	OCDA	Street, Maelesa		
Retained Attorney	RETAT	Springmeyer, Matthew H.		

Scheduled Hearing:

Date	Hearing Type - Reason	Courtroom
03/29/2019	Sentencing -	C55

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing Result
06/07/2017	Arraignment -	C55	Heard	10 court days
07/28/2017	Pre Trial -	C55	Heard	
10/13/2017	Pre Trial -	C55	Heard	Reasonable Time Waiver
12/08/2017	Pre Trial -	C55	Heard	
03/09/2018	Pre Trial -	C55	Heard	
06/15/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
07/09/2018	Motion -	C55	Heard	Reasonable Time Waiver
07/25/2018	Motion Bail	C55	Heard	
08/02/2018	Motion Bail	C55	Heard	waives statutory time for
09/07/2018	Pre Trial -	C55	Heard	
02/01/2019	Sentencing -	C55	Heard	waives statutory time for

Bond:

Bail Date	Post Amount	Bondsman	Bondsman Address	Surety	Surety Address	Details		
						Action	Action Date	Amount
06/07/2017	100000.0	Bail Bond Professionals	null	International Fidelity Insurance Company	null	Active	06/07/2017	100000
						Exonerated	08/02/2018	100000

Case Summary

Case Number: 17CF1372

OC Pay Number: 9171100

Originating Court: Central

Defendant: Dadiomov, Boris Mikhailovick

Demographics:

Eyes: Green
 Hair: Brown
 Height(ft/in) : 5'9"
 Weight (lbs): 150

Names:

Last Name	First Name	Middle Name	Type
Dadiomov	Boris	Mikhaylovich	Alias
Dadiomov	Boris	Mikhayovich	Alias
Dadiomov	Boris	Mikhailovick	Real Name
Dadiomov	Boris	M	Court True Name

Case Status:

Status: Open
 Case Stage:
 Release Status: Released on Bond
 Warrant: N
 DMV Hold : N
 Charging Document: Complaint
 Mandatory Appearance: Y
 Owner's Resp: N
 Amendment #: 0

Counts:

Seq	S/A	Violation Date	Section Statute	OL	Violation	Plea	Plea Date	Disposition	Disposition Date
1	0	03/01/2010	182(a)(1) PC	F	Conspire to commit a crime	NOT GUILTY	06/07/2017		
1	1	03/01/2010	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017		

Co Defendants:

Last Name	First Name	Release Status	Status Date
Arguello	Carlos	Released on Own Recognizance	10/24/2018
Castro	Soraida	Released on Bond	06/07/2017
Arguello	Tania	Released on Own Recognizance	10/24/2018
Gallegos	Dulce	Released on Own Recognizance	02/01/2019

Participants:

Role	Badge Agency	Name	Vacation Start	Vacation End
District Attorney	OCDA	Hasan, Noorul		
Retained Attorney	RETAT	Gurovich, Konstantin D		
Retained Attorney	RETAT	Peterson, Wendolyn		

Scheduled Hearing:

Date	Hearing Type - Reason	Courtroom
03/08/2019	Pre Trial -	C55

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing Result
06/07/2017	Arraignment -	C55	Heard	10 court days
07/28/2017	Pre Trial -	C55	Heard	
10/13/2017	Pre Trial -	C55	Heard	Reasonable Time Waiver
12/08/2017	Pre Trial -	C55	Heard	
03/09/2018	Pre Trial -	C55	Heard	
06/15/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
09/07/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
10/19/2018	Pre Trial -	C55	Heard	
12/07/2018	Pre Trial -	C55	Heard	
02/15/2019	Pre Trial Warrant Hold	C55	Heard	Reasonable Time Waiver

Bond:

Bail Date	Post Amount	Bondsman	Bondsman Address	Surety	Surety Address	Details
						Action Action Date Amount
06/07/2017	100000.0	Slava's Bail Bonds	null	Lexington National Insurance Corporation	null	Active 06/07/2017 100000

Case Summary

Case Number: 17CF1372

OC Pay Number: 9171099

Originating Court: Central

Defendant: Castro, Soraida Veronica

Demographics:

Eyes: Brown
 Hair: Brown
 Height(ft/in) : 5'4"
 Weight (lbs): 140

Names:

Last Name	First Name	Middle Name	Type
Castro	Soraida	Veronica	Real Name

Case Status:

Status: Open
 Case Stage:
 Release Status: Released on Bond
 Warrant: N
 DMV Hold : N
 Charging Document: Complaint
 Mandatory Appearance: Y
 Owner's Resp: N
 Amendment #: 0

Counts:

Seq	S/A	Violation Date	Section Statute	OL	Violation	Plea	Plea Date	Disposition	Disposition Date
1	0	03/01/2010	182(a)(1) PC	F	Conspire to commit a crime	NOT GUILTY	06/07/2017		
1	1	03/01/2010	12022.6(a)(3) PC	F	ENH-Property damage over \$1,300,000	DENIED	06/07/2017		

Co Defendants:

Last Name	First Name	Release Status	Status Date
Arguello	Carlos	Released on Own Recognizance	10/24/2018
Dadiomov	Boris	Released on Bond	06/07/2017
Arguello	Tania	Released on Own Recognizance	10/24/2018
Gallegos	Dulce	Released on Own Recognizance	02/01/2019

Participants:

Role	Badge Agency	Name	Vacation Start	Vacation End
Interpreter	OCSC	Marino, Frances		
Interpreter	OCSC	Rubert, Joel		
Retained Attorney	RETAT	Baca, Adrian		
District Attorney	OCDA	Hasan, Noorul		
Interpreter	OCSC	Fernandez, Brenda		
Retained Attorney	RETAT	Thomas, Scott C		
Retained Attorney	RETAT	Peterson, Wendolyn		

Scheduled Hearing:

Date	Hearing Type - Reason	Courtroom
03/08/2019	Pre Trial -	C55

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing Result
06/07/2017	Arraignment -	C55	Heard	10 court days
07/28/2017	Pre Trial -	C55	Heard	
10/13/2017	Pre Trial -	C55	Heard	Reasonable Time Waiver
12/08/2017	Pre Trial -	C55	Heard	
12/28/2017	Pre Trial -	C55	Cancel	
03/09/2018	Pre Trial -	C55	Heard	
06/15/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
09/07/2018	Pre Trial -	C55	Heard	Reasonable Time Waiver
10/19/2018	Pre Trial -	C55	Heard	
12/07/2018	Pre Trial -	C55	Heard	
02/15/2019	Pre Trial Warrant Hold	C55	Heard	Reasonable Time Waiver

Bond:

Bail Date	Post Amount	Bondsman	Bondsman Address	Surety	Surety Address	Details
						Action Action Date Amount
06/07/2017	100000.0	North Coast Bail	null	Bankers Insurance	null	

