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Comprehensive Pain Clinic & Hitendra Hirachand Shad, M.D.

Exhibit #	Document	File Date
1	<i>The People of the State of CA v. Faramarz Fred Khalili et al.</i> , First Amended Indictment, Case No. 15CF2507, Orange County	3/1/2016
2	<i>The People of the State of CA v. Faramarz Fred Khalili et al.</i> , First Case Summary, Case No. 15CF2507, Orange County	
3	NPI, Hitendra H. Shah, M.D.	
4	CA Secretary of State, Comprehensive Pain Clinic, Inc. C1900799	8/28/1996

Exhibit 1

MAR 01 2016

ALAN CARLSON, Clerk of the Court

BY: C. CEPEDA, DEPUTY

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

6	THE PEOPLE OF THE STATE OF CALIFORNIA,)	FELONY COMPLAINT
7)	WARRANT
8)	AMENDMENT 1
9)	
10	vs.)	No. <u>15CF2507</u>
)	OCDA WC14110013
11	FARAMARZ FRED KHALILI)	01/10/61
	N9365659)	
12	AKA FARAMARZ KHALILI)	
13	FAMARZ FRED KHALILI)	
	HALILI ARAMARZ)	
14	SANDRA GARCIA MARTINEZ)	05/24/68
15	C6548229)	
16	AKA SANDRA MARTINEZ)	
	SANDRA GARCIA)	
17	HITENDRA HIRACHAND SHAH MD)	01/01/47
	C1825179)	
18)	
19)	Defendant(s))

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

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1 COUNT 1: On or about and between September 13, 2012 and
2 December 28, 2012, in violation of Section 550(a)(5) of the
3 Penal Code (CONSPIRACY TO COMMIT INSURANCE FRAUD), a FELONY,
4 FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
5 HIRACHAND SHAH MD did unlawfully conspire with HITENDRA
6 HIRACHAND SHAH, SANDRA GARCIA MARTINEZ, FARAMARZ FRED KHALILI,
7 with the intent to defraud, to prepare, make, and subscribe a
8 material writing with the intent to present and use it to
9 WORKERS COMPENSATION CARRIERS in support of a false and
fraudulent claim. It is further alleged that pursuant to and for
the purpose of carrying out the objects and purposes of the
conspiracy, one and more of the conspirators committed the
following overt acts:

10 OVERT ACT 1

11 Fred Khalili entered into an agreement with Healthcare Finance
12 Management on 9/1/2012 to distribute transdermal compound creams
13 which were manufactured by Curt's Compounding Pharmacy in Orange
14 County to the Workers Compensation patients seen at First Choice
Healthcare Medical Group.

15 OVERT ACT 2

16 Under the guise of selling accounts receivables to Healthcare
17 Finance Management, Fred Khalili received kickbacks to
18 prescribed transdermal compound cream manufactured by Curt's
19 Compounding Pharmacy in Orange County, California.

20 OVERT ACT 3

21 Healthcare Finance Management would not purchase accounts
22 receivables from Khalili unless they were for prescriptions
23 relating to transdermal compound creams manufactured by Curt's
24 Compounding Pharmacy in Orange County, California.

25 OVERT ACT 4

26 Fred Khalili and Sandra Martinez ordered the physician's
27 assistants who worked at First Choice to prescribe at least two
28 compound transdermal creams to as many workers compensation
patients as possible regardless of medical necessity.

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OVERT ACT 5

Dr. Hitendra Shah and Dr. Craig Chanin prescribed these compound transdermal creams to workers compensation patients per Fred Khalili's instruction regardless of medical necessity.

OVERT ACT 6

Curt's Compounding Pharmacy manufactured a 3-day supply and gave it to First Choice, so that the medical staff could hand the workers compensation patients the transdermal creams at the clinic and justify First Choice's ability to bill insurance carriers for distribution of these creams.

OVERT ACT 7

Healthcare Finance Management would only pay First Choice for distribution of the transdermal Compound Creams manufactured by Curt's Compounding Pharmacy if the physicians at First Choice also prescribed a larger size of the transdermal creams to each patient which would then be directly shipped from Curt's Compounding Pharmacy in Orange County to each patient.

OVERT ACT 8

Between 9/1/12 and 12/28/12, Healthcare Finance Management paid First Choice in excess of \$774,000 for prescribing compound transdermal creams.

OVERT ACT 9

The last payment issued by Healthcare Finance Management to First Choice was on 12/28/12 in the amount of \$49,725.

COUNT 2: On or about and between September 07, 2012 and December 18, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH MD, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to AMERICAN CLAIMS MANAGEMENT, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

1 COUNT 3: On or about and between September 05, 2012 and
2 December 20, 2012, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
4 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
5 MD, with the intent to defraud, did knowingly and unlawfully
6 prepare, make, and subscribe a material writing, with the intent
7 to present and use it, and to allow it to be presented to ALASKA
8 INTERNATIONAL, in support of a false and fraudulent claim, and
9 did aid and abet, and solicit another to do the same.

10 COUNT 4: On or about and between September 21, 2012 and
11 December 10, 2012, in violation of Section 550(a)(5) of the
12 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
13 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
14 MD, with the intent to defraud, did knowingly and unlawfully
15 prepare, make, and subscribe a material writing, with the intent
16 to present and use it, and to allow it to be presented to ANTHEM
17 BLUE CROSS, in support of a false and fraudulent claim, and did
18 aid and abet, and solicit another to do the same.

19 COUNT 5: On or about and between September 06, 2012 and
20 December 13, 2012, in violation of Section 550(a)(5) of the
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
22 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
23 MD, with the intent to defraud, did knowingly and unlawfully
24 prepare, make, and subscribe a material writing, with the intent
25 to present and use it, and to allow it to be presented to
26 APPLIED RISK MANAGEMENT, in support of a false and fraudulent
27 claim, and did aid and abet, and solicit another to do the same.

28 COUNT 6: On or about and between September 06, 2012 and
December 19, 2012, in violation of Section 550(a)(5) of the
Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
MD, with the intent to defraud, did knowingly and unlawfully
prepare, make, and subscribe a material writing, with the intent
to present and use it, and to allow it to be presented to AIG/
CHARTIS, in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

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1 COUNT 7: On or about and between September 04, 2012 and
2 December 20, 2012, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
4 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
5 MD, with the intent to defraud, did knowingly and unlawfully
6 prepare, make, and subscribe a material writing, with the intent
7 to present and use it, and to allow it to be presented to CHUBB
8 INS., in support of a false and fraudulent claim, and did aid
9 and abet, and solicit another to do the same.

10 COUNT 8: On or about and between September 04, 2012 and
11 December 20, 2012, in violation of Section 550(a)(5) of the
12 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
13 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
14 MD, with the intent to defraud, did knowingly and unlawfully
15 prepare, make, and subscribe a material writing, with the intent
16 to present and use it, and to allow it to be presented to CNA
17 INS., in support of a false and fraudulent claim, and did aid
18 and abet, and solicit another to do the same.

19 COUNT 9: On or about and between September 04, 2012 and
20 December 20, 2012, in violation of Section 550(a)(5) of the
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
22 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
23 MD, with the intent to defraud, did knowingly and unlawfully
24 prepare, make, and subscribe a material writing, with the intent
25 to present and use it, and to allow it to be presented to
26 COMPWEST INS., in support of a false and fraudulent claim, and
27 did aid and abet, and solicit another to do the same.

28 COUNT 10: On or about and between September 04, 2012 and
December 20, 2012, in violation of Section 550(a)(5) of the
Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
MD, with the intent to defraud, did knowingly and unlawfully
prepare, make, and subscribe a material writing, with the intent
to present and use it, and to allow it to be presented to CRUM &
FORESTER, in support of a false and fraudulent claim, and did
aid and abet, and solicit another to do the same.

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1 COUNT 11: On or about and between September 04, 2012 and
2 December 20, 2012, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
4 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
5 MD, with the intent to defraud, did knowingly and unlawfully
6 prepare, make, and subscribe a material writing, with the intent
7 to present and use it, and to allow it to be presented to
8 DISNEY, in support of a false and fraudulent claim, and did aid
9 and abet, and solicit another to do the same.

10 COUNT 12: On or about and between September 04, 2012 and
11 December 20, 2012, in violation of Section 550(a)(5) of the
12 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
13 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
14 MD, with the intent to defraud, did knowingly and unlawfully
15 prepare, make, and subscribe a material writing, with the intent
16 to present and use it, and to allow it to be presented to
17 EMPLOYERS, in support of a false and fraudulent claim, and did
18 aid and abet, and solicit another to do the same.

19 COUNT 13: On or about and between September 04, 2012 and
20 December 20, 2012, in violation of Section 550(a)(5) of the
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
22 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
23 MD, with the intent to defraud, did knowingly and unlawfully
24 prepare, make, and subscribe a material writing, with the intent
25 to present and use it, and to allow it to be presented to
26 FARMERS, in support of a false and fraudulent claim, and did aid
27 and abet, and solicit another to do the same.

28 COUNT 14: On or about and between September 04, 2012 and
December 20, 2012, in violation of Section 550(a)(5) of the
Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
MD, with the intent to defraud, did knowingly and unlawfully
prepare, make, and subscribe a material writing, with the intent
to present and use it, and to allow it to be presented to
FIREMAN'S FUND, in support of a false and fraudulent claim, and
did aid and abet, and solicit another to do the same.

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1 COUNT 15: On or about and between September 04, 2012 and
2 December 20, 2012, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
4 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
5 MD, with the intent to defraud, did knowingly and unlawfully
6 prepare, make, and subscribe a material writing, with the intent
7 to present and use it, and to allow it to be presented to
8 HARTFORD, in support of a false and fraudulent claim, and did
9 aid and abet, and solicit another to do the same.

10 COUNT 16: On or about and between September 04, 2012 and
11 December 20, 2012, in violation of Section 550(a)(5) of the
12 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
13 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
14 MD, with the intent to defraud, did knowingly and unlawfully
15 prepare, make, and subscribe a material writing, with the intent
16 to present and use it, and to allow it to be presented to ICW,
17 in support of a false and fraudulent claim, and did aid and
18 abet, and solicit another to do the same.

19 COUNT 17: On or about and between September 04, 2012 and
20 December 20, 2012, in violation of Section 550(a)(5) of the
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
22 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
23 MD, with the intent to defraud, did knowingly and unlawfully
24 prepare, make, and subscribe a material writing, with the intent
25 to present and use it, and to allow it to be presented to
26 LIBERTY MUTUAL, in support of a false and fraudulent claim, and
27 did aid and abet, and solicit another to do the same.

28 COUNT 18: On or about and between September 04, 2012 and
December 20, 2012, in violation of Section 550(a)(5) of the
Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
MD, with the intent to defraud, did knowingly and unlawfully
prepare, make, and subscribe a material writing, with the intent
to present and use it, and to allow it to be presented to
PACIFIC COMP, in support of a false and fraudulent claim, and
did aid and abet, and solicit another to do the same.

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1 COUNT 19: On or about and between September 04, 2012 and
2 December 20, 2012, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
4 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
5 MD, with the intent to defraud, did knowingly and unlawfully
6 prepare, make, and subscribe a material writing, with the intent
7 to present and use it, and to allow it to be presented to
8 SEABRIGHT, in support of a false and fraudulent claim, and did
9 aid and abet, and solicit another to do the same.

10 COUNT 20: On or about and between September 04, 2012 and
11 December 20, 2012, in violation of Section 550(a)(5) of the
12 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
13 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
14 MD, with the intent to defraud, did knowingly and unlawfully
15 prepare, make, and subscribe a material writing, with the intent
16 to present and use it, and to allow it to be presented to
17 SEDWICK INS., in support of a false and fraudulent claim, and
18 did aid and abet, and solicit another to do the same.

19 COUNT 21: On or about and between September 04, 2012 and
20 December 20, 2012, in violation of Section 550(a)(5) of the
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
22 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
23 MD, with the intent to defraud, did knowingly and unlawfully
24 prepare, make, and subscribe a material writing, with the intent
25 to present and use it, and to allow it to be presented to SENTRY
26 INS, in support of a false and fraudulent claim, and did aid and
27 abet, and solicit another to do the same.

28 COUNT 22: On or about and between September 04, 2012 and
December 20, 2012, in violation of Section 550(a)(5) of the
Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
MD, with the intent to defraud, did knowingly and unlawfully
prepare, make, and subscribe a material writing, with the intent
to present and use it, and to allow it to be presented to
TRAVELERS, in support of a false and fraudulent claim, and did
aid and abet, and solicit another to do the same.

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1 COUNT 23: On or about and between September 04, 2012 and
2 December 20, 2012, in violation of Section 550(a)(5) of the
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
4 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
5 MD, with the intent to defraud, did knowingly and unlawfully
6 prepare, make, and subscribe a material writing, with the intent
7 to present and use it, and to allow it to be presented to YORK
8 RISK MGT, in support of a false and fraudulent claim, and did
9 aid and abet, and solicit another to do the same.

10 COUNT 24: On or about and between September 04, 2012 and
11 December 20, 2012, in violation of Section 550(a)(5) of the
12 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
13 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
14 MD, with the intent to defraud, did knowingly and unlawfully
15 prepare, make, and subscribe a material writing, with the intent
16 to present and use it, and to allow it to be presented to
17 ZENITH, in support of a false and fraudulent claim, and did aid
18 and abet, and solicit another to do the same.

19 COUNT 25: On or about and between September 04, 2012 and
20 December 20, 2012, in violation of Section 550(a)(5) of the
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, FARAMARZ
22 FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH
23 MD, with the intent to defraud, did knowingly and unlawfully
24 prepare, make, and subscribe a material writing, with the intent
25 to present and use it, and to allow it to be presented to
26 ZURICH, in support of a false and fraudulent claim, and did aid
27 and abet, and solicit another to do the same.

28 COUNT 26: On or about November 15, 2012, in violation of Section
549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY,
FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
HIRACHAND SHAH MD did unlawfully solicit, accept, and refer
business to and from HEALTHCARE FINANCE MANAGEMENT, with the
knowledge that, and with reckless disregard for whether
HEALTHCARE FINANCE MANAGEMENT intended to violate Penal Code
section 550 and Insurance Code section 1871.4.

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1 COUNT 27: On or about November 21, 2012, in violation of Section
2 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY,
3 FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
4 HIRACHAND SHAH MD did unlawfully solicit, accept, and refer
5 business to and from HEALTHCARE FINANCE MANAGEMENT, with the
6 knowledge that, and with reckless disregard for whether
HEALTHCARE FINANCE MANAGEMENT intended to violate Penal Code
section 550 and Insurance Code section 1871.4.

7 COUNT 28: On or about November 29, 2012, in violation of Section
8 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY,
9 FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
10 HIRACHAND SHAH MD did unlawfully solicit, accept, and refer
11 business to and from HEALTHCARE FINANCE MANAGEMENT, with the
12 knowledge that, and with reckless disregard for whether
HEALTHCARE FINANCE MANAGEMENT intended to violate Penal Code
section 550 and Insurance Code section 1871.4.

13 COUNT 29: On or about December 06, 2012, in violation of Section
14 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY,
15 FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
16 HIRACHAND SHAH MD did unlawfully solicit, accept, and refer
17 business to and from HEALTHCARE FINANCE MANAGEMENT, with the
18 knowledge that, and with reckless disregard for whether
HEALTHCARE FINANCE MANAGEMENT intended to violate Penal Code
section 550 and Insurance Code section 1871.4.

19 COUNT 30: On or about December 13, 2012, in violation of Section
20 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY,
21 FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
22 HIRACHAND SHAH MD did unlawfully solicit, accept, and refer
23 business to and from HEALTHCARE FINANCE MANAGEMENT, with the
24 knowledge that, and with reckless disregard for whether
HEALTHCARE FINANCE MANAGEMENT intended to violate Penal Code
section 550 and Insurance Code section 1871.4.

25 COUNT 31: On or about December 20, 2012, in violation of Section
26 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY,
27 FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
28 HIRACHAND SHAH MD did unlawfully solicit, accept, and refer
business to and from HEALTHCARE FINANCE MANAGEMENT, with the
knowledge that, and with reckless disregard for whether
HEALTHCARE FINANCE MANAGEMENT intended to violate Penal Code
section 550 and Insurance Code section 1871.4.

1 COUNT 32: On or about December 28, 2012, in violation of Section
2 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY,
3 FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA
4 HIRACHAND SHAH MD did unlawfully solicit, accept, and refer
5 business to and from HEALTHCARE FINANCE MANAGEMENT, with the
6 knowledge that, and with reckless disregard for whether
7 HEALTHCARE FINANCE MANAGEMENT intended to violate Penal Code
8 section 550 and Insurance Code section 1871.4.

7 COUNT 33: On or about November 08, 2012, in violation of
8 Section 650 of the Business & Professions Code (REBATES FOR
9 PATIENT REFERRALS), a FELONY, HITENDRA HIRACHAND SHAH MD, a
10 person licensed under the Healing Arts Division of this Code and
11 the Chiropractic Initiative Act, did unlawfully offer, deliver,
12 receive, and accept any rebate, refund, commission, preference,
13 patronage dividend, discount, and other consideration as
14 compensation and inducement for referring patients, clients, and
15 customers to HEALTHCARE FINANCE MANAGEMENT.

13 COUNT 34: On or about and between September 04, 2012 and
14 December 28, 2012, in violation of Section 2052(b) of the
15 Business and Professions Code (CONSPIRING IN THE UNAUTHORIZED
16 PRACTICE OF MEDICINE), a FELONY, FARAMARZ FRED KHALILI, SANDRA
17 GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH MD did unlawfully
18 conspire with another to practice, attempt to practice, hold
19 himself or herself out as practicing a system and mode of
20 treating the sick and afflicted in the State of California, and
21 conspire with another to diagnose, treat, operate for, and
22 prescribe for an ailment, blemish, deformity, disease,
23 disfigurement, disorder, injury and physical or mental condition
24 of a person without a valid, unrevoked and unsuspended
25 certificate provided in Chapter 5 of the California Business and
26 Professions Code or obtained in accordance with some other
27 provisions of law. It is further alleged that pursuant to and
28 for the purpose of carrying out the objects and purposes of the
conspiracy, one and more of the conspirators committed the
following overt acts:

OVERT ACT 1

27 Fred Khalili formed Madison Management a California Corporation,
28 in 2009 and operated this business as the owner and CEO.

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OVERT ACT 2

Fred Khalili was in charge of First Choice Medical Group, a Medical Corporation even though he was not a medical doctor.

OVERT ACT 3

First Choice Medical Group was operated as a clinic that provided medical treatment to workers compensation patients.

OVERT ACT 4

Khalili instructed his attorney to file documents with the Secretary of State in California naming Dr. Julio Westerband, M.D., as the owner and medical director of First Choice Medical Group in 2009.

OVERT ACT 5

Khalili, and not Dr. Julio Westerband, M.D., controlled all of the bank accounts that were held by First Choice Medical Group.

OVERT ACT 6

Khalili only paid Dr. Julio Westerband, M.D., a per diem rate when Dr. Westerband, M.D., came to the clinic to see workers compensation patients.

OVERT ACT 7

Dr. Julio Westerband, M.D., was not compensated as the owner and medical director of First Choice Medical Group by Khalili.

OVERT ACT 8

At Khalili's direction, Sandra Martinez hired Dr. Hitendra Shah, M.D. to work as a physician with First Choice Medical Group.

OVERT ACT 9

Dr. Hitendra Shah and Dr. Craig Chanin prescribed these compound transdermal creams to workers compensation patients per Fred Khalili's instruction regardless of medical necessity.

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OVERT ACT 10

Fred Khalili and Sandra Martinez were in charge of First Choice Medical Group, and this medical clinic did not have a medical director between 9/1/12 through 1/1/13.

OVERT ACT 11

Khalili wrote a check (#2375) in the amount of \$10,000 to Curt's Compounding Pharmacy on 12/12/12 for compound distributed in First Choice Medical Group.

OVERT ACT 12

On 9/1/12, Khalili entered into a contract with Healthcare Finance Management, to distribute transdermal compound creams manufactured by Curt's Compounding Pharmacy, in Orange County.

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 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24 and 25, defendants FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH MD engaged in a pattern of related fraudulent felony conduct involving the taking of more than five hundred thousand dollars (\$500,000).

As to Count(s) 26, 27, 28, 29, 30, 31 and 32, it is further alleged pursuant to Penal Code section 12022.6(a)(2) (PROPERTY LOSS OVER \$200,000), that FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH MD 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.

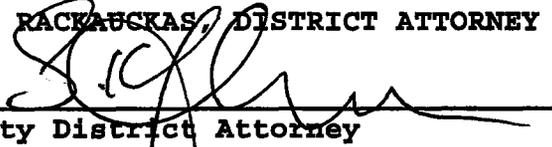
As to Count(s) 34, it is further alleged pursuant to Penal Code section 12022.6(a)(2) (PROPERTY LOSS OVER \$200,000), that FARAMARZ FRED KHALILI, SANDRA GARCIA MARTINEZ and HITENDRA HIRACHAND SHAH MD intentionally took, damaged, and destroyed property valued in excess of two hundred thousand dollars (\$200,000) during the commission and attempted commission of the above offense.

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

Dated 02-18-2016 at Orange County, California.
KS/AC 15F01341

TONY RACKAUSKAS, DISTRICT ATTORNEY

by: 
Deputy District Attorney

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

- FARAMARZ FRED KHALILI - \$ 250,000.00
- SANDRA GARCIA MARTINEZ - \$ 250,000.00
- HITENDRA HIRACHAND SHAH MD - \$ 250,000.00

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 2

Case Summary

Case Number: 15CF2507

OC Pay Number: 8661897

Originating Court: Central

Defendant: Shah, Hitendra Hirachand

Demographics:

Eyes: Black
 Hair: Black
 Height(ft/in) : 5'11"
 Weight (lbs): 185

Names:

Last Name	First Name	Middle Name	Type
Shah	Hitendra	Hirachand	Court True Name
Shah	Hitendra	Hirachand	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	09/13/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
1	1	09/13/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
2	0	09/07/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
2	1	09/07/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
3	0	09/05/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
3	1	09/05/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
4	0	09/21/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
4	1	09/21/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
5	0	09/06/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
5	1	09/06/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
6	0	09/06/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
6	1	09/06/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
7	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
7	1	09/04/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
8	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
8	1	09/04/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
9	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016		
9	1	09/04/2012	186.11(a)(1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016		
10	0	09/04/2012		F			06/07/2016		

			550(a)(5) PC		Making false or fraudulent claims	NOT GUILTY	
10	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
11	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
11	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
12	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
12	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
13	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
13	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
14	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
14	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
15	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
15	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
16	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
16	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
17	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
17	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
18	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
18	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
19	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
19	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
20	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
20	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
21	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
21	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
22	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
22	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
23	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
23	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
24	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
24	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
25	0	09/04/2012	550(a)(5) PC	F	Making false or fraudulent claims	NOT GUILTY	06/07/2016
25	1	09/04/2012	186.11(a) (1)/(2) PC	F	ENH-Aggravated white collar crime over \$500k	DENIED	06/07/2016
26	0	11/15/2012	549 PC	F	False or fraudulent claims, solicitation, acceptance or referral of business	NOT GUILTY	06/07/2016
26	1	11/15/2012	12022.6(a) (2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016

27	0	11/21/2012	549 PC	F	False or fraudulent claims, solicitation, acceptance or referral of business	NOT GUILTY	06/07/2016
27	1	11/21/2012	12022.6(a)(2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016
28	0	11/29/2012	549 PC	F	False or fraudulent claims, solicitation, acceptance or referral of business	NOT GUILTY	06/07/2016
28	1	11/29/2012	12022.6(a)(2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016
29	0	12/06/2012	549 PC	F	False or fraudulent claims, solicitation, acceptance or referral of business	NOT GUILTY	06/07/2016
29	1	12/06/2012	12022.6(a)(2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016
30	0	12/13/2012	549 PC	F	False or fraudulent claims, solicitation, acceptance or referral of business	NOT GUILTY	06/07/2016
30	1	12/13/2012	12022.6(a)(2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016
31	0	12/20/2012	549 PC	F	False or fraudulent claims, solicitation, acceptance or referral of business	NOT GUILTY	06/07/2016
31	1	12/20/2012	12022.6(a)(2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016
32	0	12/28/2012	549 PC	F	False or fraudulent claims, solicitation, acceptance or referral of business	NOT GUILTY	06/07/2016
32	1	12/28/2012	12022.6(a)(2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016
33	0	11/08/2012	650 BP	F	Unlawful Referral of Patients/Clients	NOT GUILTY	06/07/2016
34	0	09/04/2012	2052(b) BP	F	Conspiring in, aiding and abetting the unauthorized practice of medicine	NOT GUILTY	06/07/2016
34	1	09/04/2012	12022.6(a)(2) PC	F	ENH-Property damage over \$200,000	DENIED	06/07/2016

Co Defendants:**Last Name First Name Release Status Status Date**

Khalili	Faramarz	Released on Bond	11/09/2015
Martinez	Sandra	Released on Bond	11/09/2015

Participants:

Role	Badge Agency	Name	Vacation Start	Vacation End
District Attorney	OCDA	Kamiabipour, Shaddi		
Retained Attorney	RETAT	Collins, Mansfield		
Retained Attorney	RETAT	Larouche, Mark A.		

Scheduled Hearing:

Date	Hearing Type - Reason	Courtroom
11/22/2019	Pre Trial -	C35

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing Result
11/09/2015	Further Proceedings -	C55	Heard	
11/09/2015	Further Proceedings -	C49	Heard	Waives arraignment today
12/18/2015	Chambers Work -	C5	Heard	
01/13/2016	Arraignment -	C55	Heard	Waives arraignment today
03/01/2016	Arraignment -	C55	Heard	Waives arraignment today
04/19/2016	Arraignment -	C55	Heard	Waives arraignment today
06/07/2016	Arraignment -	C55	Heard	10 court/60 calendar days
07/19/2016	Motion -	C55	Heard	
07/28/2016	Pre Trial -	C55	Cancel	
07/29/2016	Pre Trial -	C45	Heard	
07/29/2016	Motion Joinder	C45	Heard	10 court/60 calendar days
07/29/2016	Motion Joinder	C45	Heard	General Time Waiver
09/26/2016	Preliminary Hearing -	C55	Cancel	
11/04/2016	Pre Trial -	C45	Heard	Reasonable Time Waiver
12/09/2016	Motion Discovery	C45	Heard	

01/11/2017 Chambers Work -	C45	Heard	
01/27/2017 Pre Trial -	C45	Cancel	
01/30/2017 Pre Trial -	C45	Heard	General Time Waiver
05/05/2017 Pre Trial -	C45	Heard	10 court/60 calendar days
06/09/2017 Further Proceedings -	C45	Heard	
09/08/2017 Pre Trial -	C45	Heard	Reasonable Time Waiver
11/14/2017 Chambers Work -	C45	Heard	
12/08/2017 Pre Trial -	C45	Heard	Reasonable Time Waiver
01/12/2018 Pre Trial -	C45	Heard	10 court/60 calendar days
02/08/2018 Chambers Work -	C1	Heard	
05/11/2018 Pre Trial -	C45	Cancel	
05/11/2018 Pre Trial -	C41	Heard	Reasonable Time Waiver
08/31/2018 Pre Trial -	C41	Cancel	
09/06/2018 Pre Trial -	C41	Heard	Reasonable Time Waiver
09/07/2018 Pre Trial -	C41	Cancel	
11/16/2018 Pre Trial -	C41	Heard	Reasonable Time Waiver
01/25/2019 Pre Trial -	C41	Heard	Reasonable Time Waiver
03/14/2019 Pre Trial -	C41	Heard	Reasonable Time Waiver
03/15/2019 Pre Trial -	C41	Cancel	
05/14/2019 Chambers Work -	C41	Heard	
07/11/2019 Further Proceedings -	C35	Heard	Reasonable Time Waiver
07/12/2019 Pre Trial -	C41	Cancel	
07/12/2019 Pre Trial -	C35	Cancel	
08/16/2019 Pre Trial -	C35	Heard	Reasonable Time Waiver
08/19/2019 Pre Trial -	C35	Cancel	
09/13/2019 Pre Trial -	C35	Heard	Reasonable Time Waiver

Bond:

Bail Date	Post Amount	Bondsman	Bondsman Address	Surety	Surety Address	Details		
						Action	Action Date	Amount
11/09/2015	250000.0	BLISS BAIL BONDS	null	Bankers Insurance Company	null	Active	11/09/2015	250000

Exhibit 3

1376614818

MR. HITENDRA H. SHAH

National Provider Identifiers Registry

The Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) mandated the adoption of standard unique identifiers for health care providers and health plans. The purpose of these provisions is to improve the efficiency and effectiveness of the electronic transmission of health information. The Centers for Medicare & Medicaid Services (CMS) has developed the National Plan and Provider Enumeration System (NPPES) to assign these unique identifiers.

1376614818 MR. HITENDRA H. SHAH

<i>NPI</i>	1376614818	10-position all-numeric identification number assigned by the NPS to uniquely identify a health care provider.
<i>Entity Type</i>	Individual	Code describing the type of health care provider that is being assigned an NPI. Codes are: 1 = (Person): individual human being who furnishes health care; 2 = (Non-person): entity other than an individual human being that furnishes health care (for example, hospital, SNF, hospital subunit, pharmacy, or HMO).
<i>Is Sole Proprietor</i>	Y	Indicate whether provider is a sole proprietor. A sole proprietor is the sole (the only) owner of a business that is not incorporated; that unincorporated business is a sole proprietorship. In a sole proprietorship, the sole proprietor owns all of the assets of the business and is solely liable for all of the debts of the business. There is no difference between a sole proprietorship and a sole proprietor; they are legally a single entity: an individual. In terms of NPI assignment, a sole proprietor is an Entity type 1 (Individual) and is eligible for only one NPI (the sole proprietorship business is not eligible for its own NPI). As an individual, a sole proprietorship cannot be a subpart and cannot have subparts. (See NPI Final Rule for information about subparts.) A sole proprietorship may or may not have employees. Often, the IRS assigns an EIN to a sole proprietorship in order to protect the sole proprietor's SSN from disclosure in claims or on W-2s. NPPES does not capture a sole proprietorship's EIN. Many types of health care providers could be sole proprietorships (for example, group practices, pharmacies, home health agencies).
<i>Provider Last Name (Legal Name)</i>	SHAH	The last name of the provider (if an individual). If the provider is an individual, this is the legal name. This name must match the name on file with the Social Security Administration (SSA). In addition, the date of birth must match that on file with SSA. (First and last names are required for initial applications.) The First, Middle, Last and Credential(s) fields allow the following special characters: ampersand, apostrophe, colon, comma, forward slash, hyphen, left and right parentheses, period, pound sign, quotation mark, and semi-colon. A field cannot contain all special characters.
<i>Provider First Name</i>	HITENDRA	The first name of the provider, if the provider is an individual.

<i>Provider Middle Name</i>	H.	The middle name of the provider, if the provider is an individual.
<i>Provider Name Prefix Text</i>	MR.	The name prefix or salutation of the provider if the provider is an individual; for example, Mr., Mrs., or Corporal.
<i>Provider Credential Text</i>	M.D.	The abbreviations for professional degrees or credentials used or held by the provider, if the provider is an individual. Examples are MD, DDS, CSW, CNA, AA, NP, RNA, or PSY. These credential designations will not be verified by NPS.
<i>Provider First Line Business Mailing Address</i>	23341 GOLDEN SPRINGS DR	The first line mailing address of the provider being identified. This data element may contain the same information as "Provider first line location address".
<i>Provider Second Line Business Mailing Address</i>	# 210	The second line mailing address of the provider being identified. This data element may contain the same information as "Provider second line location address".
<i>Provider Business Mailing Address City Name</i>	DIAMOND BAR	The City name in the mailing address of the provider being identified. This data element may contain the same information as "Provider location address City name".
<i>Provider Business Mailing Address State Name</i>	CA	The State or Province name in the mailing address of the provider being identified. This data element may contain the same information as "Provider location address State name".
<i>Provider Business Mailing Address Postal Code</i>	91765-2058	The postal ZIP or zone code in the mailing address of the provider being identified. NOTE: ZIP code plus 4-digit extension, if available. This data element may contain the same information as "Provider location address postal code".
<i>Provider Business Mailing Address Country Code</i>	US	The country code in the mailing address of the provider being identified. This data element may contain the same information as "Provider location address country code".
<i>Provider Business Mailing Address Telephone Number</i>	909-860-2610	The telephone number associated with mailing address of the provider being identified. This data element may contain the same information as "Provider location address telephone number".
<i>Provider First Line Business Practice Location Address</i>	23341 GOLDEN SPRINGS DR	The first line location address of the provider being identified. For providers with more than one physical location, this is the primary location. This address cannot include a Post Office box.
<i>Provider Second Line Business Practice Location Address</i>	# 210	The second line location address of the provider being identified. For providers with more than one physical location, this is the primary location. This address cannot include a Post Office box.
<i>Provider Business Practice Location Address City Name</i>	DIAMOND BAR	The city name in the location address of the provider being identified.

<i>Provider Business Practice Location Address State Name</i>	CA	The State or Province name in the location address of the provider being identified.
<i>Provider Business Practice Location Address Postal Code</i>	91765-2058	The postal ZIP or zone code in the location address of the provider being identified. NOTE: ZIP code plus 4-digit extension, if available.
<i>Provider Business Practice Location Address Country Code</i>	US	The country code in the location address of the provider being identified.
<i>Provider Business Practice Location Address Telephone Number</i>	909-860-2610	The telephone number associated with the location address of the provider being identified.
<i>Provider Enumeration Date</i>	11/13/2006	The date the provider was assigned a unique identifier (assigned an NPI).
<i>Last Update Date</i>	07/08/2007	The date that a record was last updated or changed.
<i>Provider Gender Code</i>	M	The code designating the provider's gender if the provider is a person.
<i>Provider Gender</i>	Male	The provider's gender if the provider is a person.
<i>Healthcare Provider Taxonomy Code #1</i>	207Q00000X	The Health Care Provider Taxonomy code is a unique alphanumeric code, ten characters in length. The code set is structured into three distinct "Levels" including Provider Type, Classification, and Area of Specialization.
<i>Healthcare Provider Taxonomy 1</i>	Family Medicine	Healthcare Provider Taxonomy #1
<i>Provider License Number 1</i>	A36638	Certain taxonomy selections will require you to enter your license number and the state where the license was issued. Select Foreign Country in the state drop down box if the license was issued outside of United States. The License Number field allows the following special characters: ampersand, apostrophe, colon, comma, forward slash, hyphen, left and right parentheses, period, pound sign, quotation mark, and semi-colon. A field cannot contain all special characters. DO NOT report the Social Security Number (SSN), IRS Individual Taxpayer Identification Number (ITIN) in this section.
<i>Provider License Number State Code 1</i>	CA	Provider License Number State Code #1
<i>Healthcare Provider Primary Taxonomy Switch 1</i>	Y	Primary Taxonomy: X - The primary taxonomy switch is Not Answered. Y - The taxonomy is the primary taxonomy (there can be only one per NPI record); N - The taxonomy is not the primary taxonomy.

<i>Other Provider Identifier 1</i>	00A366381	Other Provider Identifier #1
<i>Other Provider Identifier Type 1</i>	MEDICAID	Other Provider Identifier Type #1
<i>Other Provider Identifier State 1</i>	CA	Other Provider Identifier State #1

NPPES National Plan & Enumeration System
1-800-465-3203 (NPI Toll-Free)
1-800-692-2326 (NPI TTY)
NPI Enumerator
PO Box 6059
Fargo, ND 58108-6059
Email: customerservice@npienumerator.com

For all questions regarding this bundle please contact Support@HIPAASpace.com. Also feel free to let us know about any suggestions or concerns. All additional information as well as customer support is available at <http://www.hipaaspace.com>.

Exhibit 4

Alex Padilla
California Secretary of State

Business Search - Entity Detail

The California Business Search is updated daily and reflects work processed through Sunday, December 8, 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.

C1900799 COMPREHENSIVE PAIN CLINIC, INC.

Registration Date:	02/28/1996
Jurisdiction:	CALIFORNIA
Entity Type:	DOMESTIC STOCK
Status:	DISSOLVED
Agent for Service of Process:	BHARATI SHAH 23341 GOLDEN SPRINGS DR SUITE 210 DIAMOND BAR CA 91765
Entity Address:	23341 GOLDEN SPRINGS DR SUITE 210 DIAMOND BAR CA 91765
Entity Mailing Address:	23341 GOLDEN SPRINGS DR SUITE 210 DIAMOND BAR CA 91765

Document Type	⇕	File Date	⇓	PDF
ELECTION TO DISSOLVE		12/20/2013		
DISSOLUTION		12/20/2013		
SI-NO CHANGE		09/14/2011		
SI-COMPLETE		11/24/2008		
REGISTRATION		02/28/1996		

* 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](#).

1900799

ARTICLES OF INCORPORATION
OF
COMPREHENSIVE PAIN CLINIC, INC.

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

FEB 28 1996

Bill Jones
BILL JONES, Secretary of State

I.

The name of this corporation is COMPREHENSIVE PAIN CLINIC, INC.

II.

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 Corporations Code.

III.

The name and address in the State of California of this corporation's initial agent for service of process is ALAN W. CURTIS, ESQ, 4921 Birch Street, Suite 110, Newport Beach, CA. 92660.

IV.

This corporation is authorized to issue only one class of shares of common stock; and the total number of shares which this corporation is authorized to issue is twenty-five thousand (25,000).

V.

The liability of the directors of the corporation for monetary damages shall be eliminated to the fullest extent permissible under California law.

VI.

The corporation is authorized to provide indemnification of agents, as that term is defined in Section 317 of the California Corporations Code, for breach of duty to the corporation and its shareholders in excess of that expressly permitted by said Section 317 under any bylaw, agreement, vote of shareholders or disinterested directors or otherwise, to the fullest extent such indemnification may be authorized hereby, subject to the limits on such excess indemnification set forth in Section 204 of the California Corporations Code. The corporation is further authorized to provide insurance for agents as set forth in Section 317 of the California Corporations Code, provided that, in cases where the corporation owns all or a portion of the shares of the company issuing the insurance

policy, one of the two sets of conditions set forth in Section 317, as amended, is met.

VII.

Any repeal or modification of the foregoing provisions of Articles V and VI by the shareholders of this corporation shall not adversely affect any right or protection of a director or agent of this corporation existing at the time of such repeal or modification.

Dated: January 8, 1996

A handwritten signature in cursive script that reads "Marti Bartlett".

Marti Bartlett
Sole Incorporator

State of California Secretary of State



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

NOV 24 2008

STATEMENT OF INFORMATION (Domestic Stock and Agricultural Cooperative Corporations) FEES (Filing and Disclosure): \$25.00. If amendment, see instructions. IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

23 ec

This Space For Filing Use Only

1 CORPORATE NAME (Please do not alter if name is preprinted.) COMPREHENSIVE PAIN CLINIC, INC. 23341 GOLDEN SPRINGS DR SUITE 210 DIAMOND BAR, CA 91765

1900 799

DUE DATE:

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

Table with 4 rows and 4 columns: Item number, Address, City, State, ZIP Code. Includes Principal Executive Office, Principal Business Office, and Mailing Address.

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

Table with 4 rows and 4 columns: Item number, Name, Address, City, State, ZIP Code. Includes Chief Executive Officer, Secretary, and Chief Financial Officer.

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.)

Table with 4 rows and 4 columns: Item number, Name, Address, City, State, ZIP Code. Includes Director Bharati Shah.

11. 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 13 must be completed with a California street address (a P.O. Box address is not acceptable). If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 13 must be left blank.)

12. NAME OF AGENT FOR SERVICE OF PROCESS: BHARATI SHAH. 13. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL: 23341 GOLDEN SPRINGS DR, SUITE 210, DIAMOND BAR, CA 91765.

TYPE OF BUSINESS

14. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION: PHYSICIAN

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

11-19-08 DATE, BHARATI SHAH TYPE/PRINT NAME OF PERSON COMPLETING FORM, PRES/CEO TITLE, Signature



State of California Secretary of State

S

E-G69497

FILED

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

Sep - 14 2011

This Space For Filing Use Only

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00. If amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. CORPORATE NAME

C1900799
COMPREHENSIVE PAIN CLINIC, INC.

23341 GOLDEN SPRINGS DR SUITE 210
DIAMOND BAR, CA 91765

Due Date:

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

- 2 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 16**.
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 has been previously filed, this form must be completed in its entirety.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 3 and 4 cannot be P.O. Boxes.)

3. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
4. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE CA	ZIP CODE
5. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 3	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.)

6. CHIEF EXECUTIVE OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
7. SECRETARY	ADDRESS	CITY	STATE	ZIP CODE
8. 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.)

9. NAME	ADDRESS	CITY	STATE	ZIP CODE
10. NAME	ADDRESS	CITY	STATE	ZIP CODE
11. NAME	ADDRESS	CITY	STATE	ZIP CODE

12. 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 14 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 14 must be left blank.)

13. NAME OF AGENT FOR SERVICE OF PROCESS			
14. ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE CA	ZIP CODE

Type of Business

15. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION

16. 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.

09/14/2011 ANTHONY JOHN AZAVEDO CPA
DATE TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM TITLE SIGNATURE



State of California Secretary of State

1900799

Domestic Stock Corporation Certificate of Dissolution

DISS STK

D1216357

FILED Secretary of State State of California

DEC 20 2013

Handwritten initials and signature

There is no fee for filing a Certificate of Dissolution.

IMPORTANT - Read instructions before completing this form.

This Space For Filing Use Only

Corporate Name (Enter the name of the domestic stock corporation exactly as it is of record with the California Secretary of State.)

1. Name of corporation
COMPREHENSIVE PAIN CLINIC, INC.

Required Statements (The following statements are required by statute and should not be altered.)

2. A final franchise tax return, as described by California Revenue and Taxation Code section 23332, has been or will be filed with the California Franchise Tax Board, as required under the California Revenue and Taxation Code, Division 2, Part 10.2 (commencing with Section 18401). The corporation has been completely wound up and is dissolved.

Debts & Liabilities (Check the applicable statement. Note: Only one box may be checked.)

- 3. [] The corporation's known debts and liabilities have been actually paid.
[] The corporation's known debts and liabilities have been paid as far as its assets permitted.
[] The corporation's known debts and liabilities have been adequately provided for by their assumption and the name and address of the assumer is
[] The corporation's known debts and liabilities have been adequately provided for as far as its assets permitted.
(Specify in an attachment to this certificate (incorporated herein by this reference) the provision made and the address of the corporation, person or governmental agency that has assumed or guaranteed the payment, or the name and address of the depository with which deposit has been made or other information necessary to enable creditors or others to whom payment is to be made to appear and claim payment.)
[] The corporation never incurred any known debts or liabilities.

Assets (Check the applicable statement. Note: Only one box may be checked.)

- 4. [] The known assets have been distributed to the persons entitled thereto.
[] The corporation never acquired any known assets.

Election (Check the "YES" or "NO" box, as applicable. Note: If the "NO" box is checked, a Certificate of Election to Wind Up and Dissolve pursuant to Corporations Code section 1901 must be filed prior to or together with this Certificate of Dissolution.)

5. The election to dissolve was made by the vote of all the outstanding shares. [] YES [] NO

Verification & Execution (If additional signature space is necessary, the dated signature(s) with verification(s) may be made on an attachment to this certificate. Any attachments to this certificate are incorporated herein by this reference.)

6. The undersigned constitute(s) 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.

12/17/2013

Date

Signature of Director (Handwritten signature)

BHARATI H. SHAH

Type or Print Name of Director

Signature of Director

Type or Print Name of Director

Signature of Director

Type or Print Name of Director



State of California Secretary of State

ELEC STK

D121635b

1900799

Domestic Stock Corporation Certificate of Election to Wind Up and Dissolve

FILED Secretary of State State of California

DEC 20 2013

Handwritten initials and signature

NOTE: To complete the dissolution process, the corporation must also file a Certificate of Dissolution pursuant to Corporations Code section 1905.

There is no fee for filing a Certificate of Election To Wind Up and Dissolve.

IMPORTANT - Read instructions before completing this form.

This Space For Filing Use Only

Corporate Name (Enter the name of the domestic stock corporation exactly as it is of record with the California Secretary of State.)

1. Name of corporation

COMPREHENSIVE PAIN CLINIC, INC.

Required Statement (The following statement is required by statute and should not be altered.)

2. The corporation has elected to wind up and dissolve.

Election (Check the applicable statement. Note: Only one box may be checked.)

3. [] The election was made by the vote of _____ shares of the corporation, and representing at least 50 percent of the voting power. (number of shares)

[x] The corporation has not issued any shares; the election was made by the board of directors of the corporation.

Signatory Authority (Check the applicable statement. Note: Only one box may be checked.)

4. [x] The undersigned constitutes the sole director or a majority of the directors now in office of the above-named corporation.

[] The undersigned constitute the chairman of the board, president or vice president and the secretary, chief financial officer, treasurer, assistant secretary or assistant treasurer of the above-named corporation.

[] The undersigned constitute(s) the shareholder(s) authorized to execute this certificate by shareholders holding shares representing 50 percent or more of the voting power of the above-named corporation.

Verification & Execution (If additional signature space is necessary, the dated signature(s) with verification(s) may be made on an attachment to this certificate. Any attachments to this certificate are incorporated herein by this reference.)

5. 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.

12/17/2013

Date

Handwritten signature of Bharati HL Shah

Signature of Director, Officer or Shareholder

BHARATI HL SHAH

Type or Print Name of Director, Officer or Shareholder

Signature of Director, Officer or Shareholder

Type or Print Name of Director, Officer or Shareholder

Signature of Director or Shareholder

Type or Print Name of Director or Shareholder