

INDEX_FIRSTLINE HEALTH_US HEALTH AND ORTHOPEDIC, INC. AND ROSA BERNAL

Exhibits	DOCUMENTS	DATE FILED
	Indictment RIF1990023 The People of CA v. Rosa Bernal, Hector Sandoval, et.al.	1/17/19
	Indictment RIF 1990022 The People of CA v. Munir Uwaydah, Janek Hunt, et. al.	1/17/19
Exhibit 1	CA Secretary of State Articles of Incorporation Firstline Health Inc.	2/23/2010
Exhibit 2	CA Secretary of State (SOS) Statement of Information (SI) Firstline Health Inc.	1/16/2017
Exhibit 3	SOS Certificate of Amendment of Articles of Incorporation-Firstline Health Inc.	5/10/2018
Exhibit 4	SOS SI Firstline Health Inc.	10/19/2018
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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

JAN 17 2019

D. Johnson

ALB

JAN 24 2019

12 SUPERIOR COURT OF CALIFORNIA
13 COUNTY OF RIVERSIDE
14 (Riverside)

16 THE PEOPLE OF THE STATE OF CALIFORNIA,
17
18 PLAINTIFF,
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20 V.
21 KENNETH AMODEO
22 DOB: 2/4/1959,
23 EDGAR LOZANO
24 DOB: 11/21/1966
25 ROSA BERNAL
26 DOB: 4/14/1971,
27 HECTOR SANDOVAL
28 DOB: 9/22/1964,
29
30 DEFENDANTS.

NO. RTF1990023

INDICTMENT

32 COUNT 1

33 The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses
34 EDGAR LOZANO and ROSA BERNAL of a violation of section 182, subdivision (a), subsection
35 (1) of the Penal Code, a felony, in that on or about September 1, 2015, through and including
36

1 September 1, 2018, in the County of Riverside, State of California, the defendants did willfully
2 and unlawfully conspire together and with another person and persons whose identity is unknown
3 to commit the crime of KNOWINGLY MAKING ANY FALSE OR FRAUDULENT CLAIMS
4 FOR PAYMENT OF HEALTH CARE BENEFITS, in violation of Penal Code section 550,
5 subdivision (a), subsection (6), a felony, and that pursuant to and for the purpose of carrying out
6 the objects and purposes of the aforesaid conspiracy, the said defendants thereafter committed the
7 following overt act and acts at and in the County of Riverside:

8
9 OVERT ACT NO. 1

10
11 Munir Uwaydah controls a network of healthcare, pharmaceutical, and management entities
12 including Blue Oak Medical Group (BOMG), Frontline Health, Firstline Health, US Health
13 & Orthopedic ("the Clinics"), California Pharmaceuticals, Fusion Pharmaceuticals, Talca
14 Pharmaceuticals, and Golden State Pharmaceuticals ("the Pharmacies"), Controlled Health
15 Management, Walnut Capital, and La Jolla Orthopedic and Pain Management, Inc.
(collectively, "the Organization.")

16
17 OVERT ACT NO. 2

18
19 Munir Uwaydah disguised his control of the Organization by directing the filing of
20 documents with the California Secretary of State and the California Pharmacy Board stating
that others were in positions of control for each entity.

21
22 OVERT ACT NO. 3

23
24 Matthew Rifat aided and abetted Munir Uwaydah in disguising his control over the
Organization by filing documents listing figureheads in charge of the various components of
the Organization.

25
26 OVERT ACT NO. 4

27
28 The Organization attempted to disguise its true ownership to avoid detection by law
enforcement, and/or insurance investigators, and/or to avoid lien consolidation.

29
30 OVERT ACT NO. 5

31
32 The Organization filed liens at the Workers' Compensation Appeals Board on behalf of
physicians, practitioners, and providers.

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34 OVERT ACT NO. 6

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36 Munir Uwaydah used Robin Chorn as a figurehead medical director of BOMG.

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OVERT ACT NO. 7

Robin Chorn had no actual decision making power in the Organization.

OVERT ACT NO. 8

Shannon Devane forged Robin Chorn's signature on medication order forms.

OVERT ACT NO. 9

BOMG exists to generate billing for pharmaceuticals.

OVERT ACT NO. 10

Munir Uwaydah directed the creation of the Pharmacies in order to set prices for pharmaceuticals, thereby increasing profit margins.

OVERT ACT NO. 11

Between 2015 and 2018 the Pharmacies had only one client: BOMG.

OVERT ACT NO. 12

BOMG routinely billed Workers' Compensation Insurance carriers for the same or similar cocktail of pharmaceuticals no matter the injury or condition.

OVERT ACT NO. 13

Janek Hunt controlled the Estonian billing operations.

OVERT ACT NO. 14

Injured workers received little, if any of the billed-for pharmaceuticals.

OVERT ACT NO. 15

BOMG increased its operations when the Los Angeles County Grand Jury indicted Munir Uwaydah and his lieutenants for their involvement in the Frontline/Firstline operations ("the Los Angeles Case").

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OVERT ACT NO. 16

In September 2015, after the filing of the Los Angeles Case, BOMG submitted bills to Workers' Compensation Insurance Carriers naming Dr. David R. Johnson as the treating physician. Dr. David R. Johnson was in custody at the time.

OVERT ACT NO. 17

In 2015, BOMG changed its primary treating physician to Galal Goubran.

OVERT ACT NO. 18

BOMG continued billing using Galal Goubran's name after his death on September 7, 2017.

OVERT ACT NO. 19

Munir Uwaydah employed Shannon Devane and Matthew Rifat to execute his orders in relation to BOMG.

OVERT ACT NO. 20

Matthew Rifat and Shannon Devane managed the day-to-day operation and logistics of the Organization.

OVERT ACT NO. 21

Shannon Devane previously worked under the co-conspirators in the Los Angeles Case.

OVERT ACT NO. 22

Medical professionals and clinic managers reported to Shannon Devane.

OVERT ACT NO. 23

Medical professionals working for the Organization relayed their concerns about improper pharmaceutical billing to Shannon Devane

OVERT ACT NO. 24

Matthew Rifat formed numerous fictitious entities, including Parkside Solutions and Alcalá Management.

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OVERT ACT NO. 25

Parkside Solutions received insurance payments intended for BOMG.

OVERT ACT NO. 26

Matthew Rifat directed the transfer of funds received from Workers' Compensation Insurance carriers through a network of fictitious entities to compensate the Organization's employees and Munir Uwaydah.

OVERT ACT NO. 29

Matthew Rifat personally ordered one case of Fluocinonide anticipating numerous prescriptions for the drug.

OVERT ACT NO. 30

Matthew Rifat approved the use of check kiting to cover expenses for Munir Uwaydah.

OVERT ACT NO. 31

Shannon Devane and Matthew Rifat both personally ordered pharmaceuticals for distribution to injured workers.

OVERT ACT NO. 32

Shannon Devane used Walnut Capital to transfer funds for and within the Organization.

OVERT ACT NO. 33

The Organization maintained a "blacklist" of Workers' Compensation Insurance carriers.

COUNT 2

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in count 1 hereof, Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550, subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and including September 1, 2018, in the County of Riverside, State of California, the defendants did willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from the County of Riverside, and the claim and amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at

1 issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

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3 COUNT 3

4 For further and separate cause of action, being a different offense but connected in its
5 commission with the charge set forth in counts 1 and 2 hereof, Criminal Grand Jury of the County
6 of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR LOZANO,
7 ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550, subdivision (a),
8 subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
9 including September 1, 2018, in the County of Riverside, State of California, the defendants did
10 willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for
11 payment of a health care benefit, to wit, from AIG, and the claim and amount at issued exceeded
12 Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue
13 exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

14
15 COUNT 4

16 For further and separate cause of action, being a different offense but connected in its
17 commission with the charge set forth in counts 1 through 3 hereof, Criminal Grand Jury of the
18 County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR
19 LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
20 subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
21 through and including September 1, 2018, in the County of Riverside, State of California, the
22 defendants did willfully and unlawfully knowingly make and cause to be made a false and
23 fraudulent claim for payment of a health care benefit, to wit, from Berkshire Hathaway, and the
24 claim and amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate
25 amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three
26 years consecutive period.

27
28 COUNT 5

29 For further and separate cause of action, being a different offense but connected in its
30 commission with the charge set forth in counts 1 through 4 hereof, Criminal Grand Jury of the
31 County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR
32 LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
33 subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
34 through and including September 1, 2018, in the County of Riverside, State of California, the
35 defendants did willfully and unlawfully knowingly make and cause to be made a false and
36 fraudulent claim for payment of a health care benefit, to wit, from the Hartford, and the claim and

1 amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims
2 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive
3 period.

4
5 COUNT 6

6 For further and separate cause of action, being a different offense but connected in its
7 commission with the charge set forth in count 1 through 5 hereof, Criminal Grand Jury of the
8 County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR
9 LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
10 subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
11 through and including September 1, 2018, in the County of Riverside, State of California, the
12 defendants did willfully and unlawfully knowingly make and cause to be made a false and
13 fraudulent claim for payment of a health care benefit, to wit, from the ICW, and the claim and
14 amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims
15 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive
16 period.

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18 COUNT 7

19 For further and separate cause of action, being a different offense but connected in its commission
20 with the charge set forth in counts 1 through 6 hereof, Criminal Grand Jury of the County of
21 Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR LOZANO, ROSA
22 BERNAL and HECTOR SANDOVAL of a violation of section 550, subdivision (a), subsection
23 (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and including
24 September 1, 2018, in the County of Riverside, State of California, the defendants did willfully
25 and unlawfully knowingly make and cause to be made a false and fraudulent claim for payment of
26 a health care benefit, to wit, from SCIF, and the claim and amount at issued exceeded Nine
27 Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded
28 Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

29
30 COUNT 8

31 For further and separate cause of action, being a different offense but connected in its
32 commission with the charge set forth in counts 1 through 7 hereof, the Criminal Grand Jury of the
33 County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR
34 LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
35 subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
36 through and including September 1, 2018, in the County of Riverside, State of California, the

1 defendants did willfully and unlawfully knowingly make and cause to be made a false and
2 fraudulent claim for payment of a health care benefit, to wit, from Travelers, and the claim and
3 amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims
4 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive
5 period.

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COUNT 9

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 8 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR
LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
through and including September 1, 2018, in the County of Riverside, State of California, the
defendants did willfully and unlawfully knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from Zenith, and the claim and
amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims
and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive
period.

COUNT 10

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 9 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR
LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
through and including September 1, 2018, in the County of Riverside, State of California, the
defendants did willfully and unlawfully knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from Walmart, and the claim and
amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims
and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive
period.

COUNT 11

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 10 hereof, the Criminal Grand Jury of
the County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR

1 LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
2 subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
3 through and including September 1, 2018, in the County of Riverside, State of California, they
4 did willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim
5 for payment of a health care benefit, to wit, from Republic, and the claim and amount at issued
6 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
7 issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period

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COUNT 12

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 10 hereof, the Criminal Grand Jury of
the County of Riverside by this Indictment hereby accuses KENNETH AMODEO, EDGAR
LOZANO, ROSA BERNAL and HECTOR SANDOVAL of a violation of section 550,
subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015,
through and including September 1, 2018, in the County of Riverside, State of California, they
did willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim
for payment of a health care benefit, to wit, from Helmsman, and the claim and amount at issued
exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

COUNT 13

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 11 hereof, the Criminal Grand Jury of
the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about December
17, 2015 through and including December 29, 2015, in the County of Riverside, State of
California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
than one transaction in a seven day period, involving monetary instruments of a total value
exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
activity.

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COUNT 14

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 12 hereof, Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about January 12, 2016 through and including January 27, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

COUNT 15

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 13 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 1, 2016 through and including February 26, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

COUNT 16

For further and separate cause of action, being a different offense but connected in its

1 commission with the charge set forth in counts 1 through 14 hereof, the Criminal Grand Jury of the
2 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL, of a violation of
3 Penal Code section 186.10, subdivision (a), a felony, in that on or about March 1, 2016, through
4 and including March 25, 2016, in the County of Riverside, State of California, the defendant did
5 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
6 day period, involving monetary instruments of a total value exceeding five thousand dollars
7 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
8 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
9 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
10 monetary instrument is derived directly or indirectly from criminal activity.

11 It is further alleged that in the commission and attempted commission of the above offense
12 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
13 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
14 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
15

16 COUNT 17

17 For further and separate cause of action, being a different offense but connected in its
18 commission with the charge set forth in counts 1 through 15 hereof, the Criminal Grand Jury of the
19 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL, of a violation of
20 Penal Code section 186.10, subdivision (a), a felony, in that on or about April 1, 2016 through and
21 including April 26, 2016, in the County of Riverside, State of California, the defendant did
22 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
23 day period, involving monetary instruments of a total value exceeding five thousand dollars
24 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
25 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
26 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
27 monetary instrument is derived directly or indirectly from criminal activity.

28 It is further alleged that in the commission and attempted commission of the above offense
29 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
30 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
31 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
32

33 COUNT 18

34 For further and separate cause of action, being a different offense but connected in its
35 commission with the charge set forth in counts 1 through 16 hereof, the Criminal Grand Jury of the
36 County of Riverside by this Indictment hereby accuses HECTOR SANDOVAL of a violation of

1 Penal Code section 186.10, subdivision (a), a felony, in that on or about May 4, 2016, through and
2 including May 26, 2016, in the County of Riverside, State of California, the defendant did willfully,
3 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
4 period, involving monetary instruments of a total value exceeding five thousand dollars
5 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
6 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
7 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
8 monetary instrument is derived directly or indirectly from criminal activity.

9 It is further alleged that in the commission and attempted commission of the above offense
10 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
11 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
12 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
13

14 COUNT 19

15 For further and separate cause of action, being a different offense but connected in its
16 commission with the charge set forth in counts 1 through 17 hereof, the Criminal Grand Jury of the
17 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
18 Penal Code section 186.10, subdivision (a), a felony, in that on or about June 1, 2016, through and
19 including June 30, 2016, in the County of Riverside, State of California, the defendant did willfully,
20 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
21 period, involving monetary instruments of a total value exceeding five thousand dollars
22 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
23 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
24 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
25 monetary instrument is derived directly or indirectly from criminal activity.

26 It is further alleged that in the commission and attempted commission of the above offense
27 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
28 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
29 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
30

31 COUNT 20

32 For further and separate cause of action, being a different offense but connected in its
33 commission with the charge set forth in counts 1 through 18 hereof, the Criminal Grand Jury of the
34 County of Riverside by this Indictment hereby accuses HECTOR SANDOVAL of a violation of
35 Penal Code section 186.10, subdivision (a), a felony, in that on or about July 7, 2016, through and
36 including July 28, 2016, in the County of Riverside, State of California, the defendant did willfully,

1 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
2 period, involving monetary instruments of a total value exceeding five thousand dollars
3 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
4 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
5 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
6 monetary instrument is derived directly or indirectly from criminal activity.

7 It is further alleged that in the commission and attempted commission of the above offense
8 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
9 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
10 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
11

12 COUNT 21

13 For further and separate cause of action, being a different offense but connected in its
14 commission with the charge set forth in counts 1 through 19 hereof, the Criminal Grand Jury of the
15 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
16 Penal Code section 186.10, subdivision (a), a felony, in that on or about August 3, 2016 through
17 and including August 31, 2016, in the County of Riverside, State of California, the defendant did
18 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
19 day period, involving monetary instruments of a total value exceeding five thousand dollars
20 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
21 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
22 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
23 monetary instrument is derived directly or indirectly from criminal activity.

24 It is further alleged that in the commission and attempted commission of the above offense
25 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
26 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
27 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
28

29 COUNT 22

30 For further and separate cause of action, being a different offense but connected in its
31 commission with the charge set forth in counts 1 through 20 hereof, the Criminal Grand Jury of the
32 County of Riverside by this Indictment hereby accuses HECTOR SANDOVAL of a violation of
33 Penal Code section 186.10, subdivision (a), a felony, in that on or about September 6, 2016, through
34 and including September 28, 2016, in the County of Riverside, State of California, the defendant
35 did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
36 seven day period, involving monetary instruments of a total value exceeding five thousand dollars

1 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
2 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
3 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
4 monetary instrument is derived directly or indirectly from criminal activity.

5 It is further alleged that in the commission and attempted commission of the above offense
6 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
7 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
8 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
9

10 COUNT 23

11 For further and separate cause of action, being a different offense but connected in its
12 commission with the charge set forth in counts 1 through 21 hereof, the Criminal Grand Jury of the
13 County of Riverside by this Indictment hereby accuses HECTOR SANDOVAL of a violation of
14 Penal Code section 186.10, subdivision (a), a felony, in that on or about October 5, 2016 through
15 and including October 26, 2016, in the County of Riverside, State of California, the defendant did
16 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
17 day period, involving monetary instruments of a total value exceeding five thousand dollars
18 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
19 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
20 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
21 monetary instrument is derived directly or indirectly from criminal activity.

22 It is further alleged that in the commission and attempted commission of the above offense
23 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
24 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
25 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
26

27 COUNT 24

28 For further and separate cause of action, being a different offense but connected in its
29 commission with the charge set forth in counts 1 through 22 hereof, the Criminal Grand Jury of the
30 County of Riverside by this Indictment hereby accuses HECTOR SANDOVAL of a violation of
31 Penal Code section 186.10, subdivision (a), a felony, in that on or about November 1, 2016 through
32 and including November 25, 2016, in the County of Riverside, State of California, the defendant
33 did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
34 seven day period, involving monetary instruments of a total value exceeding five thousand dollars
35 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
36 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the

1 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
2 monetary instrument is derived directly or indirectly from criminal activity.

3 It is further alleged that in the commission and attempted commission of the above offense
4 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
5 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
6 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
7

8 COUNT 25

9 For further and separate cause of action, being a different offense but connected in its
10 commission with the charge set forth in counts 1 through 23 hereof, the Criminal Grand Jury of the
11 County of Riverside by this Indictment hereby accuses HECTOR SANDOVAL of a violation of
12 Penal Code section 186.10, subdivision (a), a felony, in that on or about January 10, 2017, through
13 and including January 24, 2017, in the County of Riverside, State of California, the defendant did
14 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
15 day period, involving monetary instruments of a total value exceeding five thousand dollars
16 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
17 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
18 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
19 monetary instrument is derived directly or indirectly from criminal activity.

20 It is further alleged that in the commission and attempted commission of the above offense
21 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
22 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
23 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
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26 COUNT 26

27 For further and separate cause of action, being a different offense but connected in its
28 commission with the charge set forth in counts 1 through 24 hereof, the Criminal Grand Jury of the
29 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
30 Penal Code section 186.10, subdivision (a), a felony, in that on or about February 2, 2017 through
31 and including February 27, 2017, in the County of Riverside, State of California, the defendant did
32 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
33 day period, involving monetary instruments of a total value exceeding five thousand dollars
34 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
35 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
36 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the

1 monetary instrument is derived directly or indirectly from criminal activity.

2 It is further alleged that in the commission and attempted commission of the above offense
3 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
4 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
5 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
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COUNT 27

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 25 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about September 23, 2015
through and including September 30, 2015, in the County of Riverside, State of California, the
defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one
transaction in a seven day period, involving monetary instruments of a total value exceeding five
thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a
total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or
facilitate the promotion, management, establishment, or carrying on of any criminal activity, or
knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense
the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
(\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

COUNT 28

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 26 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about October 2, 2015, through
and including October 26, 2015, in the County of Riverside, State of California, the defendant did
willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
day period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

1 It is further alleged that in the commission and attempted commission of the above offense
2 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
3 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
4 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
5

6 COUNT 29

7 For further and separate cause of action, being a different offense but connected in its
8 commission with the charge set forth in counts 1 through 27 hereof, the Criminal Grand Jury of the
9 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
10 Penal Code section 186.10, subdivision (a), a felony, in that on or about November 3, 2015 through
11 and including November 27, 2015, in the County of Riverside, State of California, the defendant
12 did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
13 seven day period, involving monetary instruments of a total value exceeding five thousand dollars
14 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
15 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
16 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
17 monetary instrument is derived directly or indirectly from criminal activity.

18 It is further alleged that in the commission and attempted commission of the above offense
19 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
20 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
21 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
22

23 COUNT 30

24 For further and separate cause of action, being a different offense but connected in its
25 commission with the charge set forth in counts 1 through 28 hereof, the Criminal Grand Jury of the
26 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
27 Penal Code section 186.10, subdivision (a), a felony, in that on or about December 1, 2015 through
28 and including December 31, 2015, in the County of Riverside, State of California, the defendant did
29 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
30 day period, involving monetary instruments of a total value exceeding five thousand dollars
31 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
32 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
33 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
34 monetary instrument is derived directly or indirectly from criminal activity.

35 It is further alleged that in the commission and attempted commission of the above offense
36 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding

1 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
2 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
3

4 COUNT 31

5 For further and separate cause of action, being a different offense but connected in its
6 commission with the charge set forth in counts 1 through 29 hereof, the Criminal Grand Jury of the
7 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
8 Penal Code section 186.10, subdivision (a), a felony, in that on or about January 8, 2016 through
9 and including January 21, 2016, in the County of Riverside, State of California, the defendant did
10 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
11 day period, involving monetary instruments of a total value exceeding five thousand dollars
12 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
13 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
14 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
15 monetary instrument is derived directly or indirectly from criminal activity.

16 It is further alleged that in the commission and attempted commission of the above offense
17 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
18 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
19 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
20

21
22 COUNT 32

23 For further and separate cause of action, being a different offense but connected in its
24 commission with the charge set forth in counts 1 through 30 hereof, the Criminal Grand Jury of the
25 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
26 Penal Code section 186.10, subdivision (a), a felony, in that on or about February 1, 2016 through
27 and including February 25, 2016, in the County of Riverside, State of California, the defendant did
28 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
29 day period, involving monetary instruments of a total value exceeding five thousand dollars
30 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
31 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
32 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
33 monetary instrument is derived directly or indirectly from criminal activity.

34 It is further alleged that in the commission and attempted commission of the above offense
35 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
36 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars

1 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

2
3 COUNT 33

4 For further and separate cause of action, being a different offense but connected in its
5 commission with the charge set forth in counts 1 through 31 hereof, the Criminal Grand Jury of the
6 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
7 Penal Code section 186.10, subdivision (a), a felony, in that on or about March 2, 2016 through and
8 including March 31, 2016, in the County of Riverside, State of California, the defendant did
9 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
10 day period, involving monetary instruments of a total value exceeding five thousand dollars
11 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
12 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
13 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
14 monetary instrument is derived directly or indirectly from criminal activity.

15 It is further alleged that in the commission and attempted commission of the above offense
16 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
17 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
18 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

19
20 COUNT 34

21 For further and separate cause of action, being a different offense but connected in its
22 commission with the charge set forth in counts 1 through 32 hereof; the Criminal Grand Jury of the
23 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
24 Penal Code section 186.10, subdivision (a), a felony, in that on or about April 4, 2016 through and
25 including April 20, 2016, in the County of Riverside, State of California, the defendant did
26 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
27 day period, involving monetary instruments of a total value exceeding five thousand dollars
28 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
29 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
30 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
31 monetary instrument is derived directly or indirectly from criminal activity.

32 It is further alleged that in the commission and attempted commission of the above offense
33 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
34 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
35 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

COUNT 35

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 33 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about May 20, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 36

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 34 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about June 7, 2016 through and including June 29, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

COUNT 37

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 35 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about October 6, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully

1 conduct a transaction, and more than one transaction in a seven day period, involving monetary
2 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
3 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
4 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
5 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
6 derived directly or indirectly from criminal activity.

7
8 COUNT 38

9 For further and separate cause of action, being a different offense but connected in its
10 commission with the charge set forth in counts 1 through 36 hereof, the Criminal Grand Jury of the
11 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
12 Penal Code section 186.10, subdivision (a), a felony, in that on or about December 1, 2015, through
13 and including December 22, 2015, in the County of Riverside, State of California, the defendant did
14 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
15 day period, involving monetary instruments of a total value exceeding five thousand dollars
16 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
17 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
18 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
19 monetary instrument is derived directly or indirectly from criminal activity.

20 It is further alleged that in the commission and attempted commission of the above offense
21 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
22 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
23 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
24

25 COUNT 39

26 For further and separate cause of action, being a different offense but connected in its
27 commission with the charge set forth in counts 1 through 37 hereof, the Criminal Grand Jury of the
28 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
29 Penal Code section 186.10, subdivision (a), a felony, in that on or about January 5, 2016 through
30 and including January 26, 2016, in the County of Riverside, State of California, the defendant did
31 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
32 day period, involving monetary instruments of a total value exceeding five thousand dollars
33 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
34 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
35 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
36 monetary instrument is derived directly or indirectly from criminal activity.

1 It is further alleged that in the commission and attempted commission of the above offense
2 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
3 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
4 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
5

6 COUNT 40

7 For further and separate cause of action, being a different offense but connected in its
8 commission with the charge set forth in counts 1 through 38 hereof, the Criminal Grand Jury of the
9 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
10 Penal Code section 186.10, subdivision (a), a felony, in that on or about February 3, 2016 through
11 and including February 10, 2016, in the County of Riverside, State of California, the defendant did
12 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
13 day period, involving monetary instruments of a total value exceeding five thousand dollars
14 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
15 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
16 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
17 monetary instrument is derived directly or indirectly from criminal activity.
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19
20 COUNT 41

21 For further and separate cause of action, being a different offense but connected in its
22 commission with the charge set forth in counts 1 through 39 hereof, the Criminal Grand Jury of the
23 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
24 Penal Code section 186.10, subdivision (a), a felony, in that on or about April 4, 2016, in the
25 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
26 conduct a transaction, and more than one transaction in a seven day period, involving monetary
27 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
28 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
29 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
30 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
31 derived directly or indirectly from criminal activity.
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33 COUNT 42

34 For further and separate cause of action, being a different offense but connected in its
35 commission with the charge set forth in counts 1 through 40 hereof, the Criminal Grand Jury of the
36 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of

1 Penal Code section 186.10, subdivision (a), a felony, in that on or about June 3, 2016, in the County
2 of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a
3 transaction, and more than one transaction in a seven day period, involving monetary instruments of
4 a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving
5 monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the
6 specific intent to promote or facilitate the promotion, management, establishment, or carrying on of
7 any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from
8 criminal activity.

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COUNT 43

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 41 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about October 13, 2015 through
and including October 29, 2015, in the County of Riverside, State of California, the defendant did
willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
day period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense
the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
(\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

COUNT 44

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 42 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about November 10, 2015
through and including November 24, 2015, in the County of Riverside, State of California, the
defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one
transaction in a seven day period, involving monetary instruments of a total value exceeding five
thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a
total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or
facilitate the promotion, management, establishment, or carrying on of any criminal activity, or

1 knowing that the monetary instrument is derived directly or indirectly from criminal activity.

2 It is further alleged that in the commission and attempted commission of the above offense
3 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
4 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
5 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
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COUNT 45

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 43 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about December 30, 2015
through and including December 31, 2015, in the County of Riverside, State of California, the
defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one
transaction in a seven day period, involving monetary instruments of a total value exceeding five
thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a
total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or
facilitate the promotion, management, establishment, or carrying on of any criminal activity, or
knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense
the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
(\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

COUNT 46

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 44 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about May 16, 2016, in the
County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
conduct a transaction, and more than one transaction in a seven day period, involving monetary
instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
(\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
derived directly or indirectly from criminal activity.

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COUNT 47

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 46 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about July 19, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 48

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 47 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 17, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 49

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 48 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about April 4, 2017 through and including April 18, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the

1 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
2 monetary instrument is derived directly or indirectly from criminal activity.

3 It is further alleged that in the commission and attempted commission of the above offense
4 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
5 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
6 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
7

8 COUNT 50

9 For further and separate cause of action, being a different offense but connected in its
10 commission with the charge set forth in counts 1 through 49 hereof, the Criminal Grand Jury of the
11 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
12 Penal Code section 186.10, subdivision (a), a felony, in that on or about May 31, 2017, in the
13 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
14 conduct a transaction, and more than one transaction in a seven day period, involving monetary
15 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
16 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
17 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
18 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
19 derived directly or indirectly from criminal activity.

20 It is further alleged that in the commission and attempted commission of the above offense
21 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
22 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
23 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
24

25 COUNT 51

26 For further and separate cause of action, being a different offense but connected in its
27 commission with the charge set forth in counts 1 through 50 hereof, the Criminal Grand Jury of the
28 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
29 Penal Code section 186.10, subdivision (a), a felony, in that on or about June 6, 2017 through and
30 including June 28, 2017, in the County of Riverside, State of California, the defendant did willfully,
31 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
32 period, involving monetary instruments of a total value exceeding five thousand dollars
33 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
34 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
35 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
36 monetary instrument is derived directly or indirectly from criminal activity.

1 It is further alleged that in the commission and attempted commission of the above offense
2 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
3 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
4 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
5

6 COUNT 52

7 For further and separate cause of action, being a different offense but connected in its
8 commission with the charge set forth in counts 1 through 51 hereof, the Criminal Grand Jury of the
9 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
10 Penal Code section 186.10, subdivision (a), a felony, in that on or about July 5, 2017, in the County
11 of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a
12 transaction, and more than one transaction in a seven day period, involving monetary instruments of
13 a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving
14 monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the
15 specific intent to promote or facilitate the promotion, management, establishment, or carrying on of
16 any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from
17 criminal activity.
18

19 COUNT 53

20 For further and separate cause of action, being a different offense but connected in its
21 commission with the charge set forth in counts 1 through 52 hereof, the Criminal Grand Jury of the
22 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
23 Penal Code section 186.10, subdivision (a), a felony, in that on or about August 30, 2017, in the
24 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
25 conduct a transaction, and more than one transaction in a seven day period, involving monetary
26 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
27 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
28 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
29 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
30 derived directly or indirectly from criminal activity.
31

32 COUNT 54

33 For further and separate cause of action, being a different offense but connected in its
34 commission with the charge set forth in counts 1 through 53 hereof, the Criminal Grand Jury of the
35 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
36 Penal Code section 186.10, subdivision (a), a felony, in that on or about September 29, 2017, in the

1 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
2 conduct a transaction, and more than one transaction in a seven day period, involving monetary
3 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
4 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
5 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
6 establishment, or carrying on of any criminal activity; or knowing that the monetary instrument is
7 derived directly or indirectly from criminal activity.
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COUNT 55

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 54 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about October 31, 2017, in the
County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
conduct a transaction, and more than one transaction in a seven day period, involving monetary
instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
(\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
derived directly or indirectly from criminal activity.

COUNT 56

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 55 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about December 4, 2017 through
and including December 29, 2017, in the County of Riverside, State of California, the defendant did
willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
day period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity..

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COUNT 57

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 56 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about November 9, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 58

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 57 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about January 18, 2018, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 59

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 58 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about March 17, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,

1 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
2 derived directly or indirectly from criminal activity.

3
4 COUNT 60

5 For further and separate cause of action, being a different offense but connected in its
6 commission with the charge set forth in counts 1 through 59 hereof, the Criminal Grand Jury of the
7 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
8 Penal Code section 186.10, subdivision (a), a felony, in that on or about May 2, 2017 through and
9 including May 8, 2017, in the County of Riverside, State of California, the defendant did willfully,
10 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
11 period, involving monetary instruments of a total value exceeding five thousand dollars
12 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
13 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
14 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
15 monetary instrument is derived directly or indirectly from criminal activity.

16 It is further alleged that in the commission and attempted commission of the above offense
17 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
18 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
19 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
20

21 COUNT 61

22 For further and separate cause of action, being a different offense but connected in its
23 commission with the charge set forth in counts 1 through 60 hereof, the Criminal Grand Jury of the
24 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
25 Penal Code section 186.10, subdivision (a), a felony, in that on or about July 31, 2017, in the
26 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
27 conduct a transaction, and more than one transaction in a seven day period, involving monetary
28 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
29 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
30 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
31 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
32 derived directly or indirectly from criminal activity.

33
34 COUNT 62

35 For further and separate cause of action, being a different offense but connected in its
36 commission with the charge set forth in counts 1 through 61 hereof, the Criminal Grand Jury of the

1 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
2 Penal Code section 186.10, subdivision (a), a felony, in that on or about September 6, 2017, in the
3 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
4 conduct a transaction, and more than one transaction in a seven day period, involving monetary
5 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
6 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
7 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
8 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
9 derived directly or indirectly from criminal activity.

10
11 COUNT 63

12 For further and separate cause of action, being a different offense but connected in its
13 commission with the charge set forth in counts 1 through 62 hereof, the Criminal Grand Jury of the
14 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
15 Penal Code section 186.10, subdivision (a), a felony, in that on or about October 3, 2017, in the
16 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
17 conduct a transaction, and more than one transaction in a seven day period, involving monetary
18 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
19 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
20 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
21 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
22 derived directly or indirectly from criminal activity.

23
24 COUNT 64

25 For further and separate cause of action, being a different offense but connected in its
26 commission with the charge set forth in counts 1 through 63 hereof, the Criminal Grand Jury of the
27 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
28 Penal Code section 186.10, subdivision (a), a felony, in that on or about November 6, 2017, in the
29 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
30 conduct a transaction, and more than one transaction in a seven day period, involving monetary
31 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
32 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
33 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
34 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
35 derived directly or indirectly from criminal activity.

COUNT 65

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 64 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about December 1, 2017, through and including December 27, 2017 in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

COUNT 66

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 65 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 23, 2017, through and including February 27, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 67

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 66 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about March 6, 2017, through and including March 28, 2017, in the County of Riverside, State of California, the defendant did

1 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
2 day period, involving monetary instruments of a total value exceeding five thousand dollars
3 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
4 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
5 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
6 monetary instrument is derived directly or indirectly from criminal activity

7 It is further alleged that in the commission and attempted commission of the above offense
8 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
9 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
10 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

11
12 COUNT 68

13 For further and separate cause of action, being a different offense but connected in its
14 commission with the charge set forth in counts 1 through 67 hereof, the Criminal Grand Jury of the
15 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
16 Penal Code section 186.10, subdivision (a), a felony, in that on or about April 4 2017 through and
17 including April 26, 2017, in the County of Riverside, State of California, the defendant did
18 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
19 day period, involving monetary instruments of a total value exceeding five thousand dollars
20 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
21 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
22 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
23 monetary instrument is derived directly or indirectly from criminal activity

24 It is further alleged that in the commission and attempted commission of the above offense
25 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
26 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
27 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

28
29 COUNT 69

30 For further and separate cause of action, being a different offense but connected in its
31 commission with the charge set forth in counts 1 through 68 hereof, the Criminal Grand Jury of the
32 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
33 Penal Code section 186.10, subdivision (a), a felony, in that on or about May 16, 2017 through and
34 including May 31, 2017, in the County of Riverside, State of California, the defendant did willfully,
35 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
36 period, involving monetary instruments of a total value exceeding five thousand dollars

1 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
2 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
3 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
4 monetary instrument is derived directly or indirectly from criminal activity.

5 It is further alleged that in the commission and attempted commission of the above offense
6 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
7 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
8 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
9

10 COUNT 70

11 For further and separate cause of action, being a different offense but connected in its
12 commission with the charge set forth in counts 1 through 69 hereof, the Criminal Grand Jury of the
13 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
14 Penal Code section 186.10, subdivision (a), a felony, in that on or about June 13, 2017 through and
15 including June 19, 2017, in the County of Riverside, State of California, the defendant did willfully,
16 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
17 period, involving monetary instruments of a total value exceeding five thousand dollars
18 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
19 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
20 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
21 monetary instrument is derived directly or indirectly from criminal activity

22 It is further alleged that in the commission and attempted commission of the above offense
23 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
24 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
25 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
26

27 COUNT 71

28 For further and separate cause of action, being a different offense but connected in its
29 commission with the charge set forth in counts 1 through 70 hereof, the Criminal Grand Jury of the
30 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
31 Penal Code section 186.10, subdivision (a), a felony, in that on or about July 5, 2017 through and
32 including July 31, 2017, in the County of Riverside, State of California, the defendant did willfully,
33 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
34 period, involving monetary instruments of a total value exceeding five thousand dollars
35 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
36 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the

1 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
2 monetary instrument is derived directly or indirectly from criminal activity

3 It is further alleged that in the commission and attempted commission of the above offense
4 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
5 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
6 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
7

8 COUNT 72

9 For further and separate cause of action, being a different offense but connected in its
10 commission with the charge set forth in counts 1 through 71 hereof, the Criminal Grand Jury of the
11 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
12 Penal Code section 186.10, subdivision (a), a felony, in that on or about August 7, 2017 through
13 and including August 23, 2017, in the County of Riverside, State of California, the defendant did
14 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
15 day period, involving monetary instruments of a total value exceeding five thousand dollars
16 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
17 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
18 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
19 monetary instrument is derived directly or indirectly from criminal activity.

20 It is further alleged that in the commission and attempted commission of the above offense
21 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
22 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
23 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
24

25 COUNT 73

26 For further and separate cause of action, being a different offense but connected in its
27 commission with the charge set forth in counts 1 through 72 hereof, the Criminal Grand Jury of the
28 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
29 Penal Code section 186.10, subdivision (a), a felony, in that on or about September 13, 2017
30 through and including September 27, 2017, in the County of Riverside, State of California, the
31 defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one
32 transaction in a seven day period, involving monetary instruments of a total value exceeding five
33 thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a
34 total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or
35 facilitate the promotion, management, establishment, or carrying on of any criminal activity, or
36 knowing that the monetary instrument is derived directly or indirectly from criminal activity

1 It is further alleged that in the commission and attempted commission of the above offense
2 the said defendant, HECTOR SANDOVAL conducted a transaction and transactions exceeding
3 Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars
4 (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
5

6 COUNT 74

7 For further and separate cause of action, being a different offense but connected in its
8 commission with the charge set forth in counts 1 through 73 hereof, the Criminal Grand Jury of the
9 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
10 Penal Code section 186.10, subdivision (a), a felony, in that on or about October 4, 2017 through
11 and including October 26, 2017, in the County of Riverside, State of California, the defendant did
12 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
13 day period, involving monetary instruments of a total value exceeding five thousand dollars
14 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
15 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
16 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
17 monetary instrument is derived directly or indirectly from criminal activity

18 It is further alleged that in the commission and attempted commission of the above offense
19 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
20 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
21 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
22

23 COUNT 75

24 For further and separate cause of action, being a different offense but connected in its
25 commission with the charge set forth in counts 1 through 74 hereof, the Criminal Grand Jury of the
26 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
27 Penal Code section 186.10, subdivision (a), a felony, in that on or about November 3, 2017 through
28 and including November 28, 2017, in the County of Riverside, State of California, the defendant
29 did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
30 seven day period, involving monetary instruments of a total value exceeding five thousand dollars
31 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
32 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
33 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
34 monetary instrument is derived directly or indirectly from criminal activity.

35 It is further alleged that in the commission and attempted commission of the above offense
36 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding

1 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
2 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
3

4 COUNT 76

5 For further and separate cause of action, being a different offense but connected in its
6 commission with the charge set forth in counts 1 through 75 hereof, the Criminal Grand Jury of the
7 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
8 Penal Code section 186.10, subdivision (a), a felony, in that on or about December 6, 2017 through
9 and including December 28, 2017, in the County of Riverside, State of California, the defendant did
10 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
11 day period, involving monetary instruments of a total value exceeding five thousand dollars
12 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
13 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
14 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
15 monetary instrument is derived directly or indirectly from criminal activity

16 It is further alleged that in the commission and attempted commission of the above offense
17 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
18 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
19 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
20

21 COUNT 77

22 For further and separate cause of action, being a different offense but connected in its
23 commission with the charge set forth in counts 1 through 76 hereof, the Criminal Grand Jury of the
24 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
25 Penal Code section 186.10, subdivision (a), a felony, in that on or about January 2, 2018 through
26 and including January 30, 2018, in the County of Riverside, State of California, the defendant did
27 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
28 day period, involving monetary instruments of a total value exceeding five thousand dollars
29 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
30 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
31 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
32 monetary instrument is derived directly or indirectly from criminal activity

33 It is further alleged that in the commission and attempted commission of the above offense
34 the said defendant, HECTOR SANDOVAL, conducted a transaction and transactions exceeding
35 One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars
36 (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

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COUNT 78

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 77 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about March 14, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 79

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 78 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about July 6, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 80

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 79 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about August 15, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars

1 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
2 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
3 derived directly or indirectly from criminal activity.
4

5 COUNT 81

6 For further and separate cause of action, being a different offense but connected in its
7 commission with the charge set forth in counts 1 through 80 hereof, the Criminal Grand Jury of the
8 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
9 Penal Code section 186.10, subdivision (a), a felony, in that on or about September 8, 2017 through
10 and including September 25, 2017, in the County of Riverside, State of California, the defendant
11 did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
12 seven day period, involving monetary instruments of a total value exceeding five thousand dollars
13 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
14 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
15 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
16 monetary instrument is derived directly or indirectly from criminal activity
17

18 COUNT 82

19 For further and separate cause of action, being a different offense but connected in its
20 commission with the charge set forth in counts 1 through 81 hereof, the Criminal Grand Jury of the
21 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
22 Penal Code section 186.10, subdivision (a), a felony, in that on or about October 16, 2017 through
23 and including October 30, 2017, in the County of Riverside, State of California, the defendant did
24 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
25 day period, involving monetary instruments of a total value exceeding five thousand dollars
26 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
27 twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
28 promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
29 monetary instrument is derived directly or indirectly from criminal activity.
30

31 COUNT 83

32 For further and separate cause of action, being a different offense but connected in its
33 commission with the charge set forth in counts 1 through 82 hereof, the Criminal Grand Jury of the
34 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
35 Penal Code section 186.10, subdivision (a), a felony, in that on or about November 14, 2017
36 through and including November 24, 2017, in the County of Riverside, State of California, the

1 defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one
2 transaction in a seven day period, involving monetary instruments of a total value exceeding five
3 thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a
4 total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or
5 facilitate the promotion, management, establishment, or carrying on of any criminal activity, or
6 knowing that the monetary instrument is derived directly or indirectly from criminal activity.
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COUNT 84

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 83 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about December 20, 2017
through and including December 27, 2017, in the County of Riverside, State of California, the
defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one
transaction in a seven day period, involving monetary instruments of a total value exceeding five
thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a
total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or
facilitate the promotion, management, establishment, or carrying on of any criminal activity, or
knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 85

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 84 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
Penal Code section 186.10, subdivision (a), a felony, in that on or about January 11, 2018, through
and including January 25, 2018, in the County of Riverside, State of California, the defendant did
willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven
day period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity

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COUNT 86

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 85 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about June 5, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity

COUNT 87

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 86 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about September 6, 2017 through and including September 20, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity

COUNT 88

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 87 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about October 4, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,

1 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
2 derived directly or indirectly from criminal activity

3
4 COUNT 89

5 For further and separate cause of action, being a different offense but connected in its
6 commission with the charge set forth in counts 1 through 88 hereof, the Criminal Grand Jury of the
7 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
8 Penal Code section 186.10, subdivision (a), a felony, in that on or about November 9, 2017, in the
9 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
10 conduct a transaction, and more than one transaction in a seven day period, involving monetary
11 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
12 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
13 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
14 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
15 derived directly or indirectly from criminal activity

16
17 COUNT 90

18 For further and separate cause of action, being a different offense but connected in its
19 commission with the charge set forth in counts 1 through 89 hereof, the Criminal Grand Jury of the
20 County of Riverside by this Indictment hereby accuses, HECTOR SANDOVAL of a violation of
21 Penal Code section 186.10, subdivision (a), a felony, in that on or about December 22, 2017, in the
22 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
23 conduct a transaction, and more than one transaction in a seven day period, involving monetary
24 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
25 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
26 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
27 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
28 derived directly or indirectly from criminal activity.

29
30 COUNT 91

31 For further and separate cause of action, being a different offense but connected in its
32 commission with the charge set forth in counts. 1 through 6 hereof, the Criminal Grand Jury of the
33 County of Riverside by this Indictment hereby accuses, KENNETH AMODEO, EDGAR
34 LOZANO, ROSA BERNAL, and HECTOR SANDOVAL of a violation of section 549 of the Penal
35 Code, a felony, in that on or about September 1, 2015, through and including September 1, 2018, in
36 the County of Riverside, State of California, they did willfully and unlawfully solicit, accept, and

1 refer any business to and from any individual or entity with the knowledge that, and with reckless
2 disregard for whether, the individual or entity for or from whom the solicitation and referral was
3 made, and the individual or entity who was solicited and referred, intended to violate Section 550 of
4 the Penal Code or Section 1871.4 of the Insurance Code.

5
6 **AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT**

7 It is further alleged that the said defendants EDGAR LOZANO, committed two or more
8 related felonies, a material element of which was fraud or embezzlement, which involved a pattern
9 of related felony conduct, and this pattern of related felony conduct involved the taking of more
10 than five hundred thousand dollars (\$500,000.00) within the meaning of Penal Code section 186.11,
11 subdivision (a)(2). [2/3/5 prison]

12
13 January __, 2019

MICHAEL A. HESTRIN
District Attorney


W. MATTHEW MURRAY
Deputy District Attorney

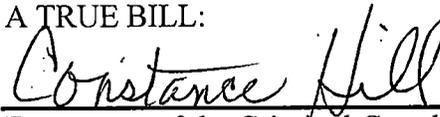
- 1 Names of witnesses examined before the Criminal Grand Jury on finding of the foregoing
2 indictment:
3 ROBIN CHORN
4 GORDON OARD
5 VIC BEYER
6 NOELANI MARS
7 LANE SPENCER
8 ROGER GUTIERREZ
9 OLIVER GLOVER
10 MICHAEL PRICE
11 ADELA REMIGIO
12 SHANTEL PULIDO
13 JANET VALDIVIA
14 DAISY MARTINEZ
15 KARLA RODAS
16 NANCY TORRES
17 ROSA BERNAL
18 BERENICE GÓMEZ
19 GARRET DAVIS
20 DANIEL GAMBLE
21 EDGAR BALTAZAR
22 GRISELDA HERNANDEZ
23 STEPHANIE ARITA
24 CRYSTAL JIMENEZ
25 BRIANNA COURTNEY BERTRAND
26 MARDELL MASTERS
27 KIMBERLY GRIFFIN
28 ELIZABETH "LESLIE" SANTIAGO GARCIA
29 MANISHA SHAFIR
30 ARNULFO PADILLA
31 OSCAR CORDOBA
32 ROSA MARTINEZ
33 MIROSLAVA LOPEZ
34 MARIA MARTINEZ
35 ROBERT HART
36 JIM FISHER

- 1 ROBERT BALDERAS
- 2 JULIA COBARRUBIAS
- 3 ESPERANZA SEGURA
- 4 GLORIA PENALOZA
- 5 REYNA OCHOA
- 6 MARIA MARIN
- 7 MARIA CRISTOBAL
- 8 EDENILSON CUATATE
- 9 ABEL TRIAS
- 10 ARNULFO PADILLA
- 11 OSCAR CORDOA
- 12 BENJAMIN IBANEZ
- 13 MIROSLAVA LOPEZ
- 14 PABLO CRUZ
- 15 MARIA MARTINEZ
- 16 PORFIRIO MENDEZ
- 17 SINTIA DEFONSECA
- 18 NANCY TORRES VALDOVINOS
- 19 JANINE FARRELL
- 20 MICHAEL FROEHLICH
- 21 SHELLEY ROSEKELLY
- 22 SCOTT BERNHARDT
- 23 DIANE ZIMMERMAN
- 24 DAVID JONES
- 25 PAUL LIBASSI
- 26 MATTHEW BORDEN
- 27 DAVID STEELE
- 28 KEVIN DECOUD
- 29 LEAH LUDWIG
- 30 MAUREEN FILLEY
- 31 KRIS ARTHUR
- 32 HECTOR SANTANA
- 33 JOHN GORDON
- 34 LUANNE SCHULER
- 35 RODRIGO LOERA
- 36 DAVID FRANKE

- 1 JEN FINCH
- 2 MIKE CABRAL
- 3 EVAN GOLDSMITH
- 4 JOHN MANDELL
- 5 ANTONY NGONDARA
- 6 MARK ANDERSON
- 7 BRIAN COSNER
- 8 LISA VINTON

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A TRUE BILL:



Foreperson of the Criminal Grand Jury

KA:nw

1 MICHAEL A. HESTRIN
2 District Attorney
3 County of Riverside
4 3960 Orange Street, First Floor
5 Riverside, California 92501
6 Telephone: (951) 955-5400
7 W. Matthew Murray, Deputy District Attorney
8 State Bar No. 259371
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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

JAN 17 2019



ALB

JAN 24 2019
R

12 SUPERIOR COURT OF CALIFORNIA
13 COUNTY OF RIVERSIDE
14 (Riverside)

15
16 THE PEOPLE OF THE STATE OF CALIFORNIA,
17
18 PLAINIFF,
19
20 V.
21
22 MUNIR UWAYDAH
23 DOB: 4/1/1966,
24
25 SHANNON DEVANE,
26 AKA SHANNON MOORE
27 AKA SHANNON DEVANE-MOORE
28 DOB: 4/24/1977
29
30 MATTHEW RIFAT
31 DOB: 10/16/1969,
32
33 JANEK HUNT
34 DOB: 9/25/1974,
35
36 DEFENDANTS.

NO. REF1990022

INDICTMENT

COUNT 1

The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses
MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a

1 violation of section 182, subdivision (a), subsection (1) of the Penal Code, a felony, in that on or
2 about September 1, 2015, through and including September 1, 2018, in the County of Riverside,
3 State of California, the defendants did willfully and unlawfully conspire together and with another
4 person and persons whose identity is unknown to commit the crime of KNOWINGLY MAKING
5 ANY FALSE OR FRAUDULENT CLAIMS FOR PAYMENT OF HEALTH CARE BENEFITS,
6 in violation of Penal Code section 550, subdivision (a), subsection (6), a felony, and that pursuant
7 to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the
8 said defendants thereafter committed the following overt act and acts at and in the County of
9 Riverside:

10
11 OVERT ACT NO. 1

12
13 Munir Uwaydah controls a network of healthcare, pharmaceutical, and management entities
14 including Blue Oak Medical Group (BOMG), Frontline Health, Firstline Health, US Health
15 & Orthopedic ("the Clinics"), California Pharmaceuticals, Fusion Pharmaceuticals, Talca
16 Pharmaceuticals, and Golden State Pharmaceuticals ("the Pharmacies"), Controlled Health
17 Management, Walnut Capital, and La Jolla Orthopedic and Pain Management, Inc.
(collectively, "the Organization.")

18 OVERT ACT NO. 2

19
20 Munir Uwaydah disguised his control of the Organization by directing the filing of
21 documents with the California Secretary of State and the California Pharmacy Board stating
22 that others were in positions of control for each entity.

23 OVERT ACT NO. 3

24 Matthew Rifat aided and abetted Munir Uwaydah in disguising his control over the
25 Organization by filing documents listing figureheads in charge of the various components of
26 the Organization.

27 OVERT ACT NO. 4

28
29 The Organization attempted to disguise its true ownership to avoid detection by law
30 enforcement, and/or insurance investigators, and/or to avoid lien consolidation.

31 OVERT ACT NO. 5

32
33 The Organization filed liens at the Workers' Compensation Appeals Board on behalf of
34 physicians, practitioners, and providers.

35 OVERT ACT NO. 6

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Munir Uwaydah used Robin Chorn as a figurehead medical director of BOMG.

OVERT ACT NO. 7

Robin Chorn had no actual decision making power in the Organization.

OVERT ACT NO. 8

Shannon Devane forged Robin Chorn's signature on medication order forms.

OVERT ACT NO. 9

BOMG exists to generate billing for pharmaceuticals.

OVERT ACT NO. 10

Munir Uwaydah directed the creation of the Pharmacies in order to set prices for pharmaceuticals, thereby increasing profit margins.

OVERT ACT NO. 11

Between 2015 and 2018 the Pharmacies had only one client: BOMG.

OVERT ACT NO. 12

BOMG routinely billed Workers' Compensation Insurance carriers for the same or similar cocktail of pharmaceuticals no matter the injury or condition.

OVERT ACT NO. 13

Janek Hunt controlled the Estonian billing operations.

OVERT ACT NO. 14

Injured workers received little, if any of the billed-for pharmaceuticals.

OVERT ACT NO. 15

BOMG increased its operations when the Los Angeles County Grand Jury indicted Munir Uwaydah and his lieutenants for their involvement in the Frontline/Firstline operations ("the Los Angeles Case").

OVERT ACT NO. 16

1 In September 2015, after the filing of the Los Angeles Case, BOMG submitted bills to
2 Workers' Compensation Insurance Carriers naming Dr. David R. Johnson as the treating
3 physician. Dr. David R. Johnson was in custody at the time.

4 OVERT ACT NO. 17

5
6 In 2015, BOMG changed its primary treating physician to Galal Goubran.

7
8 OVERT ACT NO. 18

9 BOMG continued billing using Galal Goubran's name after his death on September 7, 2017.

10
11 OVERT ACT NO. 19

12 Munir Uwaydah employed Shannon Devane and Matthew Rifat to execute his orders in
13 relation to BOMG.

14 OVERT ACT NO. 20

15
16 Matthew Rifat and Shannon Devane managed the day-to-day operation and logistics of the
17 Organization.

18 OVERT ACT NO. 21

19
20 Shannon Devane previously worked under the co-conspirators in the Los Angeles Case.

21
22 OVERT ACT NO. 22

23 Medical professionals and clinic managers reported to Shannon Devane.

24
25 OVERT ACT NO. 23

26 Medical professionals working for the Organization relayed their concerns about improper
27 pharmaceutical billing to Shannon Devane

28
29 OVERT ACT NO. 24

30
31 Matthew Rifat formed numerous fictitious entities, including Parkside Solutions and Alcala
32 Management.

33 OVERT ACT NO. 25

34
35 Parkside Solutions received insurance payments intended for BOMG.
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OVERT ACT NO. 26

Matthew Rifat directed the transfer of funds received from Workers' Compensation Insurance carriers through a network of fictitious entities to compensate the Organization's employees and Munir Uwaydah.

OVERT ACT NO. 29

Matthew Rifat personally ordered one case of Fluocinonide anticipating numerous prescriptions for the drug.

OVERT ACT NO. 30

Matthew Rifat approved the use of check kiting to cover expenses for Munir Uwaydah.

OVERT ACT NO. 31

Shannon Devane and Matthew Rifat both personally ordered pharmaceuticals for distribution to injured workers.

OVERT ACT NO. 32

Shannon Devane used Walnut Capital to transfer funds for and within the Organization.

OVERT ACT NO. 33

The Organization maintained a "blacklist" of Workers' Compensation Insurance carriers.

COUNT 2

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in count 1 hereof, Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and including September 1, 2018, in the County of Riverside, State of California, the defendants did willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from the County of Riverside, and the claim and amount at issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

COUNT 3

1 For further and separate cause of action, being a different offense but connected in its
2 commission with the charge set forth in counts 1 and 2 hereof, Criminal Grand Jury of the County
3 of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON DEVANE,
4 MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision (a), subsection
5 (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and including
6 September 1, 2018, in the County of Riverside, State of California, the defendants did willfully
7 and unlawfully knowingly make and cause to be made a false and fraudulent claim for payment of
8 a health care benefit, to wit, from AIG, and the claim and amount at issued exceeded Nine
9 Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded
10 Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

11
12 COUNT 4

13 For further and separate cause of action, being a different offense but connected in its
14 commission with the charge set forth in counts 1 through 3 hereof, Criminal Grand Jury of the
15 County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
16 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
17 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
18 including September 1, 2018, in the County of Riverside, State of California, the defendants did
19 willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for
20 payment of a health care benefit, to wit, from Berkshire Hathaway, and the claim and amount at
21 issued exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and
22 amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

23
24 COUNT 5

25 For further and separate cause of action, being a different offense but connected in its
26 commission with the charge set forth in counts 1 through 4 hereof, Criminal Grand Jury of the
27 County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
28 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
29 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
30 including September 1, 2018, in the County of Riverside, State of California, the defendants did
31 willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for
32 payment of a health care benefit, to wit, from the Hartford, and the claim and amount at issued
33 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
34 issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

35
36 COUNT 6

1 For further and separate cause of action, being a different offense but connected in its
2 commission with the charge set forth in count 1 through 5 hereof, Criminal Grand Jury of the
3 County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
4 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
5 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
6 including September 1, 2018, in the County of Riverside, State of California, the defendants did
7 willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for
8 payment of a health care benefit, to wit, from the ICW, and the claim and amount at issued
9 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
10 issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

11
12 COUNT 7

13 For further and separate cause of action, being a different offense but connected in its commission
14 with the charge set forth in counts 1 through 6 hereof, Criminal Grand Jury of the County of
15 Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON DEVANE,
16 MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision (a), subsection
17 (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and including
18 September 1, 2018, in the County of Riverside, State of California, the defendants did willfully
19 and unlawfully knowingly make and cause to be made a false and fraudulent claim for payment of
20 a health care benefit, to wit, from SCIF, and the claim and amount at issued exceeded Nine
21 Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded
22 Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

23
24 COUNT 8

25 For further and separate cause of action, being a different offense but connected in its
26 commission with the charge set forth in counts 1 through 7 hereof, the Criminal Grand Jury of the
27 County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
28 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
29 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
30 including September 1, 2018, in the County of Riverside, State of California, the defendants did
31 willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for
32 payment of a health care benefit, to wit, from Travelers, and the claim and amount at issued
33 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
34 issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

35
36 COUNT 9

1 For further and separate cause of action, being a different offense but connected in its
2 commission with the charge set forth in counts 1 through 8 hereof, the Criminal Grand Jury of the
3 County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
4 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
5 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
6 including September 1, 2018, in the County of Riverside, State of California, the defendants did
7 willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for
8 payment of a health care benefit, to wit, from Zenith, and the claim and amount at issued
9 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
10 issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

11
12 COUNT 10

13 For further and separate cause of action, being a different offense but connected in its
14 commission with the charge set forth in counts 1 through 9 hereof, the Criminal Grand Jury of the
15 County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
16 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
17 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
18 including September 1, 2018, in the County of Riverside, State of California, the defendants did
19 willfully and unlawfully knowingly make and cause to be made a false and fraudulent claim for
20 payment of a health care benefit, to wit, from Walmart, and the claim and amount at issued
21 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
22 issue exceeded Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

23
24 COUNT 11

25 For further and separate cause of action, being a different offense but connected in its
26 commission with the charge set forth in counts 1 through 10 hereof, the Criminal Grand Jury of
27 the County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
28 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
29 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
30 including September 1, 2018, in the County of Riverside, State of California, they did willfully
31 and unlawfully knowingly make and cause to be made a false and fraudulent claim for payment of
32 a health care benefit, to wit, from Republic, and the claim and amount at issued exceeded Nine
33 Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded
34 Nine Hundred Fifty dollars (\$950) in a three years consecutive period

35
36 COUNT 12

1 For further and separate cause of action, being a different offense but connected in its
2 commission with the charge set forth in counts 1 through 10 hereof, the Criminal Grand Jury of
3 the County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
4 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of section 550, subdivision
5 (a), subsection (6) of the Penal Code, a felony, in that on or about September 1, 2015, through and
6 including September 1, 2018, in the County of Riverside, State of California, they did willfully
7 and unlawfully knowingly make and cause to be made a false and fraudulent claim for payment of
8 a health care benefit, to wit, from Helmsman, and the claim and amount at issued exceeded Nine
9 Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded
10 Nine Hundred Fifty dollars (\$950) in a three years consecutive period.

11
12 COUNT 13

13 For further and separate cause of action, being a different offense but connected in its
14 commission with the charge set forth in counts 1 through 11 hereof, the Criminal Grand Jury of
15 the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
16 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
17 subdivision (a), a felony, in that on or about December 17, 2015 through and including December
18 29, 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly
19 and unlawfully conduct a transaction, and more than one transaction in a seven day period,
20 involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and
21 more than one transaction involving monetary instruments of a total exceeding twenty-five
22 thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion,
23 management, establishment, or carrying on of any criminal activity, or knowing that the monetary
24 instrument is derived directly or indirectly from criminal activity.

25
26 COUNT 14

27 For further and separate cause of action, being a different offense but connected in its
28 commission with the charge set forth in counts 1 through 12 hereof, Criminal Grand Jury of the
29 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
30 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
31 subdivision (a), a felony, in that on or about January 12, 2016 through and including January 27,
32 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
33 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
34 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
35 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
36 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,

1 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
2 derived directly or indirectly from criminal activity.

3 It is further alleged that in the commission and attempted commission of the above offense
4 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
5 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
6 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
7 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
8

9 COUNT 15

10 For further and separate cause of action, being a different offense but connected in its
11 commission with the charge set forth in counts 1 through 13 hereof, the Criminal Grand Jury of the
12 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
13 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
14 subdivision (a), a felony, in that on or about February 1, 2016 through and including February 26,
15 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
16 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
17 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
18 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
19 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
20 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
21 derived directly or indirectly from criminal activity.

22 It is further alleged that in the commission and attempted commission of the above offense
23 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
24 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
25 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
26 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
27

28 COUNT 16

29 For further and separate cause of action, being a different offense but connected in its
30 commission with the charge set forth in counts 1 through 14 hereof, the Criminal Grand Jury of the
31 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
32 DEVANE, MATTHEW RIFAT and JANEK HUNT, of a violation of Penal Code section 186.10,
33 subdivision (a), a felony, in that on or about March 1, 2016, through and including March 25, 2016,
34 in the County of Riverside, State of California, the defendant did willfully, knowingly and
35 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
36 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than

1 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
2 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
3 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
4 derived directly or indirectly from criminal activity.

5 It is further alleged that in the commission and attempted commission of the above offense
6 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
7 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
8 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
9 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

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COUNT 17

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COUNT 18

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For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 15 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
DEVANE, MATTHEW RIFAT and JANEK HUNT, of a violation of Penal Code section 186.10,
subdivision (a), a felony, in that on or about April 1, 2016 through and including April 26, 2016, in
the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
conduct a transaction, and more than one transaction in a seven day period, involving monetary
instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
(\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense
the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 16 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses MUNIR UWAYDAH, SHANNON
DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
subdivision (a), a felony, in that on or about May 4, 2016, through and including May 26, 2016, in
the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully

1 conduct a transaction, and more than one transaction in a seven day period, involving monetary
2 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
3 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
4 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
5 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
6 derived directly or indirectly from criminal activity.

7 It is further alleged that in the commission and attempted commission of the above offense
8 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
9 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
10 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
11 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

12
13 COUNT 19

14 For further and separate cause of action, being a different offense but connected in its
15 commission with the charge set forth in counts 1 through 17 hereof, the Criminal Grand Jury of the
16 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
17 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
18 subdivision (a), a felony, in that on or about June 1, 2016, through and including June 30, 2016, in
19 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
20 conduct a transaction, and more than one transaction in a seven day period, involving monetary
21 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
22 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
23 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
24 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
25 derived directly or indirectly from criminal activity.

26 It is further alleged that in the commission and attempted commission of the above offense
27 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
28 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
29 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
30 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

31
32 COUNT 20

33 For further and separate cause of action, being a different offense but connected in its
34 commission with the charge set forth in counts 1 through 18 hereof, the Criminal Grand Jury of the
35 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
36 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,

1 subdivision (a), a felony, in that on or about July 7, 2016, through and including July 28, 2016, in
2 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
3 conduct a transaction, and more than one transaction in a seven day period, involving monetary
4 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
5 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
6 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
7 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
8 derived directly or indirectly from criminal activity.

9 It is further alleged that in the commission and attempted commission of the above offense
10 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
11 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
12 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
13 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

14
15 COUNT 21

16 For further and separate cause of action, being a different offense but connected in its
17 commission with the charge set forth in counts 1 through 19 hereof, the Criminal Grand Jury of the
18 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
19 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
20 subdivision (a), a felony, in that on or about August 3, 2016 through and including August 31,
21 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
22 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
23 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
24 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
25 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
26 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
27 derived directly or indirectly from criminal activity.

28 It is further alleged that in the commission and attempted commission of the above offense
29 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
30 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
31 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
32 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

33
34 COUNT 22

35 For further and separate cause of action, being a different offense but connected in its
36 commission with the charge set forth in counts 1 through 20 hereof, the Criminal Grand Jury of the

1 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
2 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
3 subdivision (a), a felony, in that on or about September 6, 2016, through and including September
4 28, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
5 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
6 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
7 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
8 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
9 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
10 derived directly or indirectly from criminal activity.

11 It is further alleged that in the commission and attempted commission of the above offense
12 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
13 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
14 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
15 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

16
17 COUNT 23

18 For further and separate cause of action, being a different offense but connected in its
19 commission with the charge set forth in counts 1 through 21 hereof, the Criminal Grand Jury of the
20 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
21 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
22 subdivision (a), a felony, in that on or about October 5, 2016 through and including October 26,
23 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
24 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
25 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
26 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
27 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
28 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
29 derived directly or indirectly from criminal activity.

30 It is further alleged that in the commission and attempted commission of the above offense
31 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
32 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
33 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
34 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

35
36 COUNT 24

1 For further and separate cause of action, being a different offense but connected in its
2 commission with the charge set forth in counts 1 through 22 hereof, the Criminal Grand Jury of the
3 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
4 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
5 subdivision (a), a felony, in that on or about November 1, 2016 through and including November
6 25, 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
7 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
8 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
9 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
10 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
11 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
12 derived directly or indirectly from criminal activity.

13 It is further alleged that in the commission and attempted commission of the above offense
14 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
15 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
16 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
17 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
18

19 COUNT 25

20 For further and separate cause of action, being a different offense but connected in its
21 commission with the charge set forth in counts 1 through 23 hereof, the Criminal Grand Jury of the
22 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
23 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
24 subdivision (a), a felony, in that on or about January 10, 2017, through and including January 24,
25 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
26 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
27 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
28 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
29 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
30 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
31 derived directly or indirectly from criminal activity.

32 It is further alleged that in the commission and attempted commission of the above offense
33 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
34 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
35 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
36 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

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COUNT 26

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 24 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 2, 2017 through and including February 27, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

COUNT 27

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 25 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about September 23, 2015 through and including September 30, 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars

1 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
2 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

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COUNT 28

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 26 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about October 2, 2015, through and including October 26, 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

COUNT 29

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 27 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about November 3, 2015 through and including November 27, 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

1 It is further alleged that in the commission and attempted commission of the above offense
2 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
3 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
4 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
5 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
6

7 COUNT 30

8 For further and separate cause of action, being a different offense but connected in its
9 commission with the charge set forth in counts 1 through 28 hereof, the Criminal Grand Jury of the
10 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
11 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
12 subdivision (a), a felony, in that on or about December 1, 2015 through and including December 31,
13 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and
14 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
15 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
16 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
17 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
18 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
19 derived directly or indirectly from criminal activity.

20 It is further alleged that in the commission and attempted commission of the above offense
21 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
22 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
23 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
24 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]
25

26 COUNT 31

27 For further and separate cause of action, being a different offense but connected in its
28 commission with the charge set forth in counts 1 through 29 hereof, the Criminal Grand Jury of the
29 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
30 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
31 subdivision (a), a felony, in that on or about January 8, 2016 through and including January 21,
32 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
33 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
34 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
35 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
36 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,

1 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
2 derived directly or indirectly from criminal activity.

3 It is further alleged that in the commission and attempted commission of the above offense
4 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
5 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
6 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
7 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
8

9 COUNT 32

10 For further and separate cause of action, being a different offense but connected in its
11 commission with the charge set forth in counts 1 through 30 hereof, the Criminal Grand Jury of the
12 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
13 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
14 subdivision (a), a felony, in that on or about February 1, 2016 through and including February 25,
15 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
16 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
17 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
18 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
19 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
20 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
21 derived directly or indirectly from criminal activity.

22 It is further alleged that in the commission and attempted commission of the above offense
23 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
24 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
25 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
26 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
27

28 COUNT 33

29 For further and separate cause of action, being a different offense but connected in its
30 commission with the charge set forth in counts 1 through 31 hereof, the Criminal Grand Jury of the
31 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
32 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
33 subdivision (a), a felony, in that on or about March 2, 2016 through and including March 31, 2016,
34 in the County of Riverside, State of California, the defendant did willfully, knowingly and
35 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
36 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than

1 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
2 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
3 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
4 derived directly or indirectly from criminal activity.

5 It is further alleged that in the commission and attempted commission of the above offense
6 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
7 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
8 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
9 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

10
11 COUNT 34

12 For further and separate cause of action, being a different offense but connected in its
13 commission with the charge set forth in counts 1 through 32 hereof, the Criminal Grand Jury of the
14 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
15 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
16 subdivision (a), a felony, in that on or about April 4, 2016 through and including April 20, 2016, in
17 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
18 conduct a transaction, and more than one transaction in a seven day period, involving monetary
19 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
20 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
21 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
22 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
23 derived directly or indirectly from criminal activity.

24 It is further alleged that in the commission and attempted commission of the above offense
25 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
26 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
27 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
28 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

29
30 COUNT 35

31 For further and separate cause of action, being a different offense but connected in its
32 commission with the charge set forth in counts 1 through 33 hereof, the Criminal Grand Jury of the
33 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
34 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
35 subdivision (a), a felony, in that on or about May 20, 2016, in the County of Riverside, State of
36 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more

1 than one transaction in a seven day period, involving monetary instruments of a total value
2 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
3 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
4 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
5 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
6 activity.

7
8 COUNT 36

9 For further and separate cause of action, being a different offense but connected in its
10 commission with the charge set forth in counts 1 through 34 hereof, the Criminal Grand Jury of the
11 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
12 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
13 subdivision (a), a felony, in that on or about June 7, 2016 through and including June 29, 2016, in
14 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
15 conduct a transaction, and more than one transaction in a seven day period, involving monetary
16 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
17 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
18 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
19 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
20 derived directly or indirectly from criminal activity.

21 It is further alleged that in the commission and attempted commission of the above offense
22 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
23 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
24 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
25 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
26

27 COUNT 37

28 For further and separate cause of action, being a different offense but connected in its
29 commission with the charge set forth in counts 1 through 35 hereof, the Criminal Grand Jury of the
30 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
31 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
32 subdivision (a), a felony, in that on or about October 6, 2016, in the County of Riverside, State of
33 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
34 than one transaction in a seven day period, involving monetary instruments of a total value
35 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
36 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent

1 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
2 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
3 activity.

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5 COUNT 38

6 For further and separate cause of action, being a different offense but connected in its
7 commission with the charge set forth in counts 1 through 36 hereof, the Criminal Grand Jury of the
8 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
9 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
10 subdivision (a), a felony, in that on or about December 1, 2015, through and including December
11 22, 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and
12 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
13 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
14 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
15 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
16 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
17 derived directly or indirectly from criminal activity.

18 It is further alleged that in the commission and attempted commission of the above offense
19 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
20 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
21 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
22 of Penal Code section 186.10, subdivision (c)(1)(A). [1 yr.]

23
24 COUNT 39

25 For further and separate cause of action, being a different offense but connected in its
26 commission with the charge set forth in counts 1 through 37 hereof, the Criminal Grand Jury of the
27 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
28 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
29 subdivision (a), a felony, in that on or about January 5, 2016 through and including January 26,
30 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
31 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
32 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
33 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
34 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
35 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
36 derived directly or indirectly from criminal activity.

1 It is further alleged that in the commission and attempted commission of the above offense
2 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
3 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
4 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
5 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
6

7 COUNT 40

8 For further and separate cause of action, being a different offense but connected in its
9 commission with the charge set forth in counts 1 through 38 hereof, the Criminal Grand Jury of the
10 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
11 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
12 subdivision (a), a felony, in that on or about February 3, 2016 through and including February 10,
13 2016, in the County of Riverside, State of California, the defendant did willfully, knowingly and
14 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
15 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
16 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
17 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
18 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
19 derived directly or indirectly from criminal activity.
20

21 COUNT 41

22 For further and separate cause of action, being a different offense but connected in its
23 commission with the charge set forth in counts 1 through 39 hereof, the Criminal Grand Jury of the
24 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
25 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
26 subdivision (a), a felony, in that on or about April 4, 2016, in the County of Riverside, State of
27 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
28 than one transaction in a seven day period, involving monetary instruments of a total value
29 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
30 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
31 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
32 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
33 activity.
34

35 COUNT 42

36 For further and separate cause of action, being a different offense but connected in its

1 commission with the charge set forth in counts 1 through 40 hereof, the Criminal Grand Jury of the
2 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
3 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
4 subdivision (a), a felony, in that on or about June 3, 2016, in the County of Riverside, State of
5 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
6 than one transaction in a seven day period, involving monetary instruments of a total value
7 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
8 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
9 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
10 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
11 activity.

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COUNT 43

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 41 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
subdivision (a), a felony, in that on or about October 13, 2015 through and including October 29,
2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and
unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
(\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense
the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

COUNT 44

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 42 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
subdivision (a), a felony, in that on or about November 10, 2016 through and including November

1 24, 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and
2 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
3 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
4 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
5 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
6 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
7 derived directly or indirectly from criminal activity.

8 It is further alleged that in the commission and attempted commission of the above offense
9 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
10 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
11 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
12 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

13
14 COUNT 45

15 For further and separate cause of action, being a different offense but connected in its
16 commission with the charge set forth in counts 1 through 43 hereof, the Criminal Grand Jury of the
17 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
18 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
19 subdivision (a), a felony, in that on or about December 30, 2015 through and including December
20 31, 2015, in the County of Riverside, State of California, the defendant did willfully, knowingly and
21 unlawfully conduct a transaction; and more than one transaction in a seven day period, involving
22 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
23 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
24 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
25 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
26 derived directly or indirectly from criminal activity.

27 It is further alleged that in the commission and attempted commission of the above offense
28 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
29 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
30 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
31 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

32
33 COUNT 46

34 For further and separate cause of action, being a different offense but connected in its
35 commission with the charge set forth in counts 1 through 44 hereof, the Criminal Grand Jury of the
36 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON

1 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
2 subdivision (a), a felony, in that on or about May 16, 2016, in the County of Riverside, State of
3 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
4 than one transaction in a seven day period, involving monetary instruments of a total value
5 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
6 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
7 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
8 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
9 activity.

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COUNT 47

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COUNT 48

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For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 46 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
subdivision (a), a felony, in that on or about July 19, 2016, in the County of Riverside, State of
California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
than one transaction in a seven day period, involving monetary instruments of a total value
exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
activity.

For further and separate cause of action, being a different offense but connected in its
commission with the charge set forth in counts 1 through 47 hereof, the Criminal Grand Jury of the
County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
subdivision (a), a felony, in that on or about February 17, 2017, in the County of Riverside, State of
California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
than one transaction in a seven day period, involving monetary instruments of a total value
exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
activity, or knowing that the monetary instrument is derived directly or indirectly from criminal

1 activity.

2 COUNT 49

3 For further and separate cause of action, being a different offense but connected in its
4 commission with the charge set forth in counts 1 through 48 hereof, the Criminal Grand Jury of the
5 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
6 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
7 subdivision (a), a felony, in that on or about April 4, 2017 through and including April 18, 2017, in
8 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
9 conduct a transaction, and more than one transaction in a seven day period, involving monetary
10 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
11 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
12 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
13 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
14 derived directly or indirectly from criminal activity.

15 It is further alleged that in the commission and attempted commission of the above offense
16 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
17 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
18 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
19 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

20
21 COUNT 50

22 For further and separate cause of action, being a different offense but connected in its
23 commission with the charge set forth in counts 1 through 49 hereof, the Criminal Grand Jury of the
24 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
25 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
26 subdivision (a), a felony, in that on or about May 31, 2017, in the County of Riverside, State of
27 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
28 than one transaction in a seven day period, involving monetary instruments of a total value
29 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
30 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
31 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
32 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
33 activity.

34 It is further alleged that in the commission and attempted commission of the above offense
35 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
36 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars

1 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
2 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

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5 .COUNT 51

6 For further and separate cause of action, being a different offense but connected in its
7 commission with the charge set forth in counts 1 through 50 hereof, the Criminal Grand Jury of the
8 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
9 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
10 subdivision (a), a felony, in that on or about June 6, 2017 through and including June 28, 2017, in
11 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
12 conduct a transaction, and more than one transaction in a seven day period, involving monetary
13 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
14 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
15 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
16 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
17 derived directly or indirectly from criminal activity.

18 It is further alleged that in the commission and attempted commission of the above offense
19 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
20 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
21 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
22 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

23
24 COUNT 52

25 For further and separate cause of action, being a different offense but connected in its
26 commission with the charge set forth in counts 1 through 51 hereof, the Criminal Grand Jury of the
27 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
28 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
29 subdivision (a), a felony, in that on or about July 5, 2017, in the County of Riverside, State of
30 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
31 than one transaction in a seven day period, involving monetary instruments of a total value
32 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
33 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
34 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
35 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
36 activity.

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COUNT 53

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 52 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about August 30, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 54

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 53 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about September 29, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 55

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 54 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about October 31, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more

1 than one transaction in a seven day period, involving monetary instruments of a total value
2 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
3 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
4 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
5 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
6 activity.

7
8 **COUNT 56**

9 For further and separate cause of action, being a different offense but connected in its
10 commission with the charge set forth in counts 1 through 55 hereof, the Criminal Grand Jury of the
11 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
12 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
13 subdivision (a), a felony, in that on or about December 4, 2017 through and including December 29,
14 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
15 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
16 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
17 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
18 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
19 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
20 derived directly or indirectly from criminal activity.

21
22 **COUNT 57**

23 For further and separate cause of action, being a different offense but connected in its
24 commission with the charge set forth in counts 1 through 56 hereof, the Criminal Grand Jury of the
25 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
26 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
27 subdivision (a), a felony, in that on or about November 9, 2017, in the County of Riverside, State of
28 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
29 than one transaction in a seven day period, involving monetary instruments of a total value
30 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
31 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
32 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
33 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
34 activity.

35
36 **COUNT 58**

1 For further and separate cause of action, being a different offense but connected in its
2 commission with the charge set forth in counts 1 through 57 hereof, the Criminal Grand Jury of the
3 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
4 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
5 subdivision (a), a felony, in that on or about January 18, 2018, in the County of Riverside, State of
6 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
7 than one transaction in a seven day period, involving monetary instruments of a total value
8 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
9 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
10 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
11 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
12 activity.

13
14 COUNT 59

15 For further and separate cause of action, being a different offense but connected in its
16 commission with the charge set forth in counts 1 through 58 hereof, the Criminal Grand Jury of the
17 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
18 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
19 subdivision (a), a felony, in that on or about March 17, 2017, in the County of Riverside, State of
20 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
21 than one transaction in a seven day period, involving monetary instruments of a total value
22 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
23 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
24 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
25 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
26 activity.

27
28 COUNT 60

29 For further and separate cause of action, being a different offense but connected in its
30 commission with the charge set forth in counts 1 through 59 hereof, the Criminal Grand Jury of the
31 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
32 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
33 subdivision (a), a felony, in that on or about May 2, 2017 through and including May 8, 2017, in the
34 County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
35 conduct a transaction, and more than one transaction in a seven day period, involving monetary
36 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one

1 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
2 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
3 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
4 derived directly or indirectly from criminal activity.

5 It is further alleged that in the commission and attempted commission of the above offense
6 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
7 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
8 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
9 of Penal Code section 186.10, subdivision (c)(1)(A). [1 yr.]

10
11 COUNT 61

12 For further and separate cause of action, being a different offense but connected in its
13 commission with the charge set forth in counts 1 through 60 hereof, the Criminal Grand Jury of the
14 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
15 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
16 subdivision (a), a felony, in that on or about July 31, 2017, in the County of Riverside, State of
17 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
18 than one transaction in a seven day period, involving monetary instruments of a total value
19 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
20 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
21 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
22 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
23 activity.

24
25 COUNT 62

26 For further and separate cause of action, being a different offense but connected in its
27 commission with the charge set forth in counts 1 through 61 hereof, the Criminal Grand Jury of the
28 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
29 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
30 subdivision (a), a felony, in that on or about September 6, 2017, in the County of Riverside, State of
31 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
32 than one transaction in a seven day period, involving monetary instruments of a total value
33 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
34 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
35 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
36 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal

1 activity.

2 COUNT 63

3 For further and separate cause of action, being a different offense but connected in its
4 commission with the charge set forth in counts 1 through 62 hereof, the Criminal Grand Jury of the
5 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
6 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
7 subdivision (a), a felony, in that on or about October 3, 2017, in the County of Riverside, State of
8 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
9 than one transaction in a seven day period, involving monetary instruments of a total value
10 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
11 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
12 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
13 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
14 activity.

15
16 COUNT 64

17 For further and separate cause of action, being a different offense but connected in its
18 commission with the charge set forth in counts 1 through 63 hereof, the Criminal Grand Jury of the
19 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
20 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
21 subdivision (a), a felony, in that on or about November 6, 2017, in the County of Riverside, State of
22 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
23 than one transaction in a seven day period, involving monetary instruments of a total value
24 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
25 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
26 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
27 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
28 activity.

29
30 COUNT 65

31 For further and separate cause of action, being a different offense but connected in its
32 commission with the charge set forth in counts 1 through 64 hereof, the Criminal Grand Jury of the
33 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
34 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
35 subdivision (a), a felony, in that on or about December 1, 2017, through and including December
36 27, 2017 in the County of Riverside, State of California, the defendant did willfully, knowingly and

1 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
2 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
3 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
4 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
5 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
6 derived directly or indirectly from criminal activity.

7 It is further alleged that in the commission and attempted commission of the above offense
8 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
9 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
10 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
11 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]
12

13 COUNT 66

14 For further and separate cause of action, being a different offense but connected in its
15 commission with the charge set forth in counts 1 through 65 hereof, the Criminal Grand Jury of the
16 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
17 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
18 subdivision (a), a felony, in that on or about February 23, 2017, through and including February 27,
19 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
20 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
21 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
22 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
23 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
24 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
25 derived directly or indirectly from criminal activity.
26

27 COUNT 67

28 For further and separate cause of action, being a different offense but connected in its
29 commission with the charge set forth in counts 1 through 66 hereof, the Criminal Grand Jury of the
30 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
31 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
32 subdivision (a), a felony, in that on or about March 6, 2017, through and including March 28, 2017,
33 in the County of Riverside, State of California, the defendant did willfully, knowingly and
34 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
35 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
36 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars

1 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
2 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
3 derived directly or indirectly from criminal activity

4 It is further alleged that in the commission and attempted commission of the above offense
5 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
6 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
7 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
8 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

9
10 COUNT 68

11 For further and separate cause of action, being a different offense but connected in its
12 commission with the charge set forth in counts 1 through 67 hereof, the Criminal Grand Jury of the
13 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
14 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
15 subdivision (a), a felony, in that on or about April 4 2017 through and including April 26, 2017, in
16 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
17 conduct a transaction, and more than one transaction in a seven day period, involving monetary
18 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
19 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
20 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
21 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
22 derived directly or indirectly from criminal activity

23 It is further alleged that in the commission and attempted commission of the above offense
24 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
25 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
26 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
27 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

28
29 COUNT 69

30 For further and separate cause of action, being a different offense but connected in its
31 commission with the charge set forth in counts 1 through 68 hereof, the Criminal Grand Jury of the
32 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
33 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
34 subdivision (a), a felony, in that on or about May 16, 2017 through and including May 31, 2017, in
35 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
36 conduct a transaction, and more than one transaction in a seven day period, involving monetary

1 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
2 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
3 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
4 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
5 derived directly or indirectly from criminal activity.

6 It is further alleged that in the commission and attempted commission of the above offense
7 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
8 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
9 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
10 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

11
12 COUNT 70

13 For further and separate cause of action, being a different offense but connected in its
14 commission with the charge set forth in counts 1 through 69 hereof, the Criminal Grand Jury of the
15 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
16 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
17 subdivision (a), a felony, in that on or about June 13, 2017 through and including June 19, 2017, in
18 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
19 conduct a transaction, and more than one transaction in a seven day period, involving monetary
20 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
21 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
22 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
23 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
24 derived directly or indirectly from criminal activity

25 It is further alleged that in the commission and attempted commission of the above offense
26 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
27 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
28 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
29 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

30
31 COUNT 71

32 For further and separate cause of action, being a different offense but connected in its
33 commission with the charge set forth in counts 1 through 70 hereof, the Criminal Grand Jury of the
34 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
35 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
36 subdivision (a), a felony, in that on or about July 5, 2017 through and including July 31, 2017, in

1 the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully
2 conduct a transaction, and more than one transaction in a seven day period, involving monetary
3 instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one
4 transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
5 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
6 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
7 derived directly or indirectly from criminal activity

8 It is further alleged that in the commission and attempted commission of the above offense
9 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
10 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
11 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
12 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

13
14 COUNT 72

15 For further and separate cause of action, being a different offense but connected in its
16 commission with the charge set forth in counts 1 through 71 hereof, the Criminal Grand Jury of the
17 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
18 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
19 subdivision (a), a felony, in that on or about August 7, 2017 through and including August 23,
20 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
21 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
22 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
23 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
24 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
25 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
26 derived directly or indirectly from criminal activity.

27 It is further alleged that in the commission and attempted commission of the above offense
28 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
29 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
30 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
31 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

32
33 COUNT 73

34 For further and separate cause of action, being a different offense but connected in its
35 commission with the charge set forth in counts 1 through 72 hereof, the Criminal Grand Jury of the
36 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON

1 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
2 subdivision (a), a felony, in that on or about September 13, 2017 through and including September
3 27, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
4 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
5 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
6 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
7 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
8 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
9 derived directly or indirectly from criminal activity

10 It is further alleged that in the commission and attempted commission of the above offense
11 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
12 JANEK HUNT conducted a transaction and transactions exceeding Fifty Thousand Dollars
13 (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning
14 of Penal Code section 186.10, subdivision (c)(1)(A). [1yr.]

15
16 COUNT 74

17 For further and separate cause of action, being a different offense but connected in its
18 commission with the charge set forth in counts 1 through 73 hereof, the Criminal Grand Jury of the
19 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
20 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
21 subdivision (a), a felony, in that on or about October 4, 2017 through and including October 26,
22 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
23 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
24 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
25 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
26 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
27 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
28 derived directly or indirectly from criminal activity

29 It is further alleged that in the commission and attempted commission of the above offense
30 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
31 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
32 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
33 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

34
35 COUNT 75

36 For further and separate cause of action, being a different offense but connected in its

1 commission with the charge set forth in counts 1 through 74 hereof, the Criminal Grand Jury of the
2 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
3 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
4 subdivision (a), a felony, in that on or about November 3, 2017 through and including November
5 28, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
6 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
7 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
8 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
9 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
10 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
11 derived directly or indirectly from criminal activity.

12 It is further alleged that in the commission and attempted commission of the above offense
13 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
14 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
15 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
16 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

17
18 COUNT 76

19 For further and separate cause of action, being a different offense but connected in its
20 commission with the charge set forth in counts 1 through 75 hereof, the Criminal Grand Jury of the
21 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
22 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
23 subdivision (a), a felony, in that on or about December 6, 2017 through and including December 28,
24 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
25 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
26 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
27 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
28 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
29 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
30 derived directly or indirectly from criminal activity

31 It is further alleged that in the commission and attempted commission of the above offense
32 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
33 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
34 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
35 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

COUNT 77

1
2 For further and separate cause of action, being a different offense but connected in its
3 commission with the charge set forth in counts 1 through 76 hereof, the Criminal Grand Jury of the
4 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
5 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
6 subdivision (a), a felony, in that on or about January 2, 2018 through and including January 30,
7 2018, in the County of Riverside, State of California, the defendant did willfully, knowingly and
8 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
9 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
10 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
11 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
12 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
13 derived directly or indirectly from criminal activity

14 It is further alleged that in the commission and attempted commission of the above offense
15 the said defendants, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and
16 JANEK HUNT, conducted a transaction and transactions exceeding One Hundred Fifty Thousand
17 Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of
18 Penal Code section 186.10, subdivision (c)(1)(B). [2yr.]

19
20 COUNT 78

21 For further and separate cause of action, being a different offense but connected in its
22 commission with the charge set forth in counts 1 through 77 hereof, the Criminal Grand Jury of the
23 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
24 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
25 subdivision (a), a felony, in that on or about March 14, 2017, in the County of Riverside, State of
26 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
27 than one transaction in a seven day period, involving monetary instruments of a total value
28 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
29 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
30 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
31 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
32 activity.

33
34 COUNT 79

35 For further and separate cause of action, being a different offense but connected in its
36 commission with the charge set forth in counts 1 through 78 hereof, the Criminal Grand Jury of the

1 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
2 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
3 subdivision (a), a felony, in that on or about July 6, 2017, in the County of Riverside, State of
4 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
5 than one transaction in a seven day period, involving monetary instruments of a total value
6 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
7 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
8 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
9 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
10 activity.

11
12 COUNT 80

13 For further and separate cause of action, being a different offense but connected in its
14 commission with the charge set forth in counts 1 through 79 hereof, the Criminal Grand Jury of the
15 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
16 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
17 subdivision (a), a felony, in that on or about August 15, 2017, in the County of Riverside, State of
18 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
19 than one transaction in a seven day period, involving monetary instruments of a total value
20 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
21 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
22 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
23 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
24 activity.

25
26 COUNT 81

27 For further and separate cause of action, being a different offense but connected in its
28 commission with the charge set forth in counts 1 through 80 hereof, the Criminal Grand Jury of the
29 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
30 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
31 subdivision (a), a felony, in that on or about September 8, 2017 through and including September
32 25, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
33 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
34 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
35 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
36 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,

1 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
2 derived directly or indirectly from criminal activity

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COUNT 82

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 81 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about October 16, 2017 through and including October 30, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 83

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 82 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about November 14, 2017 through and including November 24, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 84

For further and separate cause of action, being a different offense but connected in its commission with the charge set forth in counts 1 through 83 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON

1 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
2 subdivision (a), a felony, in that on or about December 20, 2017 through and including December
3 27, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
4 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
5 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
6 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
7 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
8 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
9 derived directly or indirectly from criminal activity.

10
11 COUNT 85

12 For further and separate cause of action, being a different offense but connected in its
13 commission with the charge set forth in counts 1 through 84 hereof, the Criminal Grand Jury of the
14 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
15 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
16 subdivision (a), a felony, in that on or about January 11, 2018, through and including January 25,
17 2018, in the County of Riverside, State of California, the defendant did willfully, knowingly and
18 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
19 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
20 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
21 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
22 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
23 derived directly or indirectly from criminal activity.

24
25 COUNT 86

26 For further and separate cause of action, being a different offense but connected in its
27 commission with the charge set forth in counts 1 through 85 hereof, the Criminal Grand Jury of the
28 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
29 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
30 subdivision (a), a felony, in that on or about June 5, 2017, in the County of Riverside, State of
31 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
32 than one transaction in a seven day period, involving monetary instruments of a total value
33 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
34 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
35 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
36 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal

1 activity

3 COUNT 87

4 For further and separate cause of action, being a different offense but connected in its
5 commission with the charge set forth in counts 1 through 86 hereof, the Criminal Grand Jury of the
6 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
7 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
8 subdivision (a), a felony, in that on or about September 6, 2017 through and including September
9 20, 2017, in the County of Riverside, State of California, the defendant did willfully, knowingly and
10 unlawfully conduct a transaction, and more than one transaction in a seven day period, involving
11 monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than
12 one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars
13 (\$25,000.00) with the specific intent to promote or facilitate the promotion, management,
14 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is
15 derived directly or indirectly from criminal activity

17 COUNT 88

18 For further and separate cause of action, being a different offense but connected in its
19 commission with the charge set forth in counts 1 through 87 hereof, the Criminal Grand Jury of the
20 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
21 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
22 subdivision (a), a felony, in that on or about October 4, 2017, in the County of Riverside, State of
23 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
24 than one transaction in a seven day period, involving monetary instruments of a total value
25 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
26 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
27 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
28 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
29 activity

31 COUNT 89

32 For further and separate cause of action, being a different offense but connected in its
33 commission with the charge set forth in counts 1 through 88 hereof, the Criminal Grand Jury of the
34 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
35 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
36 subdivision (a), a felony, in that on or about November 9, 2017, in the County of Riverside, State of

1 California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more
2 than one transaction in a seven day period, involving monetary instruments of a total value
3 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
4 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
5 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
6 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
7 activity

8
9 COUNT 90

10 For further and separate cause of action, being a different offense but connected in its
11 commission with the charge set forth in counts 1 through 89 hereof, the Criminal Grand Jury of the
12 County of Riverside by this Indictment hereby accuses, MUNIR UWAYDAH, SHANNON
13 DEVANE, MATTHEW RIFAT and JANEK HUNT of a violation of Penal Code section 186.10,
14 subdivision (a), a felony, in that on or about December 22, 2017, in the County of Riverside, State
15 of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and
16 more than one transaction in a seven day period, involving monetary instruments of a total value
17 exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary
18 instruments of a total exceeding twenty-five thousand dollars (\$25,000.00) with the specific intent
19 to promote or facilitate the promotion, management, establishment, or carrying on of any criminal
20 activity, or knowing that the monetary instrument is derived directly or indirectly from criminal
21 activity.

22
23 AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT

24 It is further alleged that the said defendants MUNIR UWAYDAH, SHANNON DEVANE,
25 MATTHEW RIFAT and JANEK HUNT, committed two or more related felonies, a material
26 element of which was fraud or embezzlement, which involved a pattern of related felony conduct,
27 and this pattern of related felony conduct involved the taking of more than five hundred thousand
28 dollars (\$500,000.00) within the meaning of Penal Code section 186.11, subdivision (a)(2). [2/3/5
29 prison]

30
31 January __, 2019

MICHAEL A. HESTRIN
District Attorney


W. MATTHEW MURRAY
Deputy District Attorney

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1 Names of witnesses examined before the Criminal Grand Jury on finding of the foregoing
2 indictment:

3 ROBIN CHORN

4 GORDON OARD

5 VIC BEYER

6 NOELANI MARS

7 LANE SPENCER

8 ROGER GUTIERREZ

9 OLIVER GLOVER

10 MICHAEL PRICE

11 ADELA REMIGIO

12 SHANTEL PULIDO

13 JANET VALDIVIA

14 DAISY MARTINEZ

15 KARLA RODAS

16 NANCY TORRES

17 ROSA BERNAL

18 BERENICE GOMEZ

19 GARRET DAVIS

20 DANIEL GAMBLE

21 EDGAR BALTAZAR

22 GRISELDA HERNANDEZ

23 STEPHANIE ARITA

24 CRYSTAL JIMENEZ

25 BRIANNA COURTNEY BERTRAND

26 MARDELL MASTERS

27 KIMBERLY GRIFFIN

28 ELIZABETH "LESLIE" SANTIAGO GARCIA

29 MANISHA SHAFIR

30 ARNULFO PADILLA

31 OSCAR CORDOBA

32 ROSA MARTINEZ

33 MIROSLAVA LOPEZ

34 MARIA MARTINEZ

35 ROBERT HART

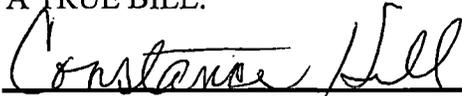
36 JIM FISHER

- 1 ROBERT BALDERAS
- 2 JULIA COBARRUBIAS
- 3 ESPERANZA SEGURA
- 4 GLORIA PENALOZA
- 5 REYNA OCHOA
- 6 MARIA MARIN
- 7 MARIA CRISTOBAL
- 8 EDENILSON CUATATE
- 9 ABEL TRIAS
- 10 ARNULFO PADILLA
- 11 OSCAR CORDOA
- 12 BENJAMIN IBANEZ
- 13 MIROSLAVA LOPEZ
- 14 PABLO CRUZ
- 15 MARIA MARTINEZ
- 16 PORFIRIO MENDEZ
- 17 SINTIA DEFONSECA
- 18 NANCY TORRES VALDOVINOS
- 19 JANINE FARRELL
- 20 MICHAEL FROEHLICH
- 21 SHELLEY ROSEKELLY
- 22 SCOTT BERNHARDT
- 23 DIANE ZIMMERMAN
- 24 DAVID JONES
- 25 PAUL LIBASSI
- 26 MATTHEW BORDEN
- 27 DAVID STEELE
- 28 KEVIN DECOUD
- 29 LEAH LUDWIG
- 30 MAUREEN FILLEY
- 31 KRIS ARTHUR
- 32 HECTOR SANTANA
- 33 JOHN GORDON
- 34 LUANNE SCHULER
- 35 RODRIGO LOERA
- 36 DAVID FRANKE

- 1 JEN FINCH
- 2 MIKE CABRAL
- 3 EVAN GOLDSMITH
- 4 JOHN MANDELL
- 5 ANTONY NGONDARA
- 6 MARK ANDERSON
- 7 BRIAN COSNER
- 8 LISA VINTON

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A TRUE BILL:



Foreperson of the Criminal Grand Jury

KA:nw

EXHIBIT 1

ARTICLES OF INCORPORATION

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

FEB 23 2010

I

The name of this corporation is FirstLine Health, Inc.

II

The purpose of the corporation is to engage in the Profession of Medicine and any other lawful activities (other than the banking or trust company business) not prohibited to a corporation engaging in such profession by applicable laws and regulations.

III

This corporation is a professional corporation within the meaning of Part 4, Division 3, Title 1, California Corporations Code.

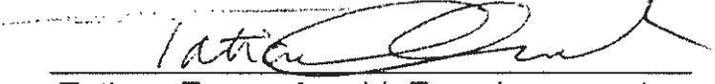
IV

The name and address in the State of California of this corporation's initial agent for service of process is:

Tatiana Torres-Arnold, Esq. C/O
Law Offices of Tatiana Arnold and Associates
16601 Ventura Boulevard, Fourth Floor
Encino, California 91436

V

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 10,000 shares.


Tatiana Torres-Arnold, Esq., Incorporator

ARTICLES OF INCORPORATION

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

FEB 23 2010

I

The name of this corporation is FirstLine Health, Inc.

II

The purpose of the corporation is to engage in the Profession of Medicine and any other lawful activities (other than the banking or trust company business) not prohibited to a corporation engaging in such profession by applicable laws and regulations.

III

This corporation is a professional corporation within the meaning of Part 4, Division 3, Title 1, California Corporations Code.

IV

The name and address in the State of California of this corporation's initial agent for service of process is:

Tatiana Torres-Arnold, Esq. C/O
Law Offices of Tatiana Arnold and Associates
16601 Ventura Boulevard, Fourth Floor
Encino, California 91436

V

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 10,000 shares.

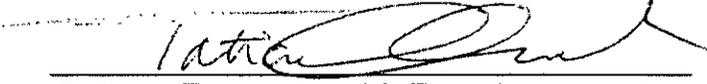

Tatiana Torres-Arnold, Esq., Incorporator

EXHIBIT 2



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

FJ17251

FILED

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

JAN-16 2017

1. CORPORATE NAME

FIRSTLINE HEALTH, INC.

2. CALIFORNIA CORPORATE NUMBER

C3276053

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
4300 LONG BEACH BL #170, LONG BEACH, CA 90807			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
4300 LONG BEACH BL #170, LONG BEACH, CA 90807			
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/ ROSA BERNAL	ADDRESS 4300 LONG BEACH BL #170, LONG BEACH, CA 90807	CITY	STATE	ZIP CODE
8. SECRETARY ROSA BERNAL	ADDRESS 4300 LONG BEACH BL #170, LONG BEACH, CA 90807	CITY	STATE	ZIP CODE
9. CHIEF FINANCIAL OFFICER/ ROSA BERNAL	ADDRESS 4300 LONG BEACH BL #170, LONG BEACH, CA 90807	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 ROSA BERNAL	ADDRESS 4300 LONG BEACH BL #170, LONG BEACH, CA 90807	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: 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 INCPOR SERVICES INC				
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
COLLECTIONS

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.

01/16/2017 ROSA BERNAL CEO
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

EXHIBIT 3

3276053

CERTIFICATE OF AMENDMENT
OF
ARTICLES OF INCORPORATION

FILED *GN*
Secretary of State
State of California

12/11 MAY 10 2018 *PK*

The undersigned certify that:

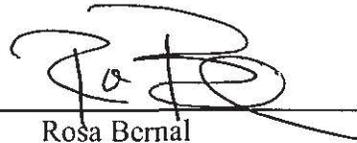
1. They are the **president** and the **secretary**, respectfully, of Firstline Health Inc., A California corporation.
2. Article II of the Articles of Incorporation of this corporation is amended to read as follows:

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.

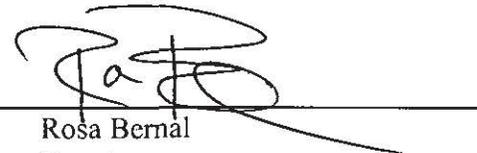
3. Article III of the Articles of Incorporation of this corporation is deleted.
4. The foregoing amendment of the Articles of Incorporation has been duly approved by the Board of Directors.
- §. The foregoing amendment of Articles of Incorporation has been duly approved by the required vote of shareholders in accordance with Section 902, California Corporations Code. The total number of outstanding shares of the corporation is one thousand (1,000). The number of shares voting in favor of the amendment equaled or exceeded the vote required. The percentage vote required was more than 50%.

We further 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 our own knowledge.

Dated: March 26, 2018



Rosa Bernal
President



Rosa Bernal
Secretary

EXHIBIT 4



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

G118654

FILED

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

OCT-19 2018

1. CORPORATE NAME

FIRSTLINE HEALTH, INC.

2. CALIFORNIA CORPORATE NUMBER

C3276053

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
4300 LONG BEACH BLVD #170, LONG BEACH, CA 90807			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
4300 LONG BEACH BL #170, LONG BEACH, CA 90807			
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
ROSA BERNAL	4300 LONG BEACH BL #170, LONG BEACH, CA 90807			
8. SECRETARY	ADDRESS	CITY	STATE	ZIP CODE
ROSA BERNAL	4300 LONG BEACH BL #170, LONG BEACH, CA 90807			
9. CHIEF FINANCIAL OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
ROSA BERNAL	4300 LONG BEACH BL #170, LONG BEACH, CA 90807			

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
ROSA BERNAL	4300 LONG BEACH BL #170, LONG BEACH, CA 90807			
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: 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	
INCPOR SERVICES INC	
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
COLLECTIONS

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.

10/19/2018 ROSA BERNAL PRESIDENT
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

EXHIBIT 5



**Secretary of State
Statement and Designation by
Foreign Corporation**

S&DC-S/N

IMPORTANT — Read Instructions before completing this form.

Must be submitted with a current **Certificate of Good Standing** issued by the government agency where the corporation was formed. See Instructions.

Filing Fee — \$100.00 (for a foreign stock corporation) or
\$30.00 (for a foreign nonprofit corporation)

Copy Fees — First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00

Note: Corporations may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to <https://www.ftb.ca.gov>.

FILED *aw* / *KM*
**Secretary of State
State of California
MAY 15 2018**

lcc This Space For Office Use Only

1. Corporate Name (Go to www.sos.ca.gov/business/be/name-availability for general corporate name requirements and restrictions.)

2. Jurisdiction (State, foreign country or place where this corporation is formed - must match the Certificate of Good Standing provided.)

Firstline Health Inc. which will do business in California as Firstline Inc.

Delaware

3. Business Addresses (Enter the complete business addresses. Items 3a and 3b cannot be a P.O. Box or "in care of" an individual or entity.)

a. Initial Street Address of Principal Executive Office - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
200 Park Avenue South, Suite 511	New York	NY	10003
b. Street Address of Principal Office in California, if any - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
10801 National Boulevard, Suite 520	Los Angeles	CA	90064
c. Mailing Address of Principal Executive Office, if different than item 3a	City (no abbreviations)	State	Zip Code

4. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL — Complete Items 4a and 4b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
		CA	

CORPORATION — Complete Item 4c. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) — Do not complete Item 4a or 4b

United Corporate Services, Inc.

5. Read and Sign Below (See instructions. Office or title not required.)

I am a corporate officer and am authorized to sign on behalf of the foreign corporation.

Hector Sandoval
Signature

Hector Sandoval
Type or Print Name

4149870

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "FIRSTLINE HEALTH INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FIFTEENTH DAY OF MAY, A.D. 2018.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "FIRSTLINE HEALTH INC." WAS INCORPORATED ON THE SIXTEENTH DAY OF FEBRUARY, A.D. 2018.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL FRANCHISE TAXES HAVE BEEN ASSESSED TO DATE.



6758521 8300

SR# 20183788468

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 202698097

Date: 05-15-18

EXHIBIT 6



**State of California
Secretary of State**

F

**Statement of Information
(Foreign Corporation)**

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FX66739

FILED

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

JUN-26 2018

1. CORPORATE NAME

FIRSTLINE HEALTH INC. WHICH WILL DO BUSINESS IN CALIFORNIA AS
FIRSTLINE INC.

2. CALIFORNIA CORPORATE NUMBER

C4149870

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 13**.

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
200 PARK AVENUE SOUTH SUITE 511, NEW YORK, NY 10003

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

6. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 4 CITY STATE ZIP CODE
PETER MAYER 200 PARK AVENUE SOUTH SUITE 511, NEW YORK, NY 10003

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
HECTOR SANDOVAL 5436 KESTER AVENUE, SHERMAN OAKS, CA 91411

8. SECRETARY ADDRESS CITY STATE ZIP CODE
HECTOR SANDOVAL 5436 KESTER AVENUE, SHERMAN OAKS, CA 91411

9. CHIEF FINANCIAL OFFICER/ ADDRESS CITY STATE ZIP CODE
HECTOR SANDOVAL 5436 KESTER AVENUE, SHERMAN OAKS, CA 91411

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 11 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 11 must be left blank.

10. NAME OF AGENT FOR SERVICE OF PROCESS
UNITED CORPORATE SERVICES, INC.

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

Type of Business

12. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
CONSULTING SERVICES

13. THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT.

06/26/2018 PETER FRIEDRICH MAYER ATTORNEY
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

EXHIBIT 7

 **Secretary of State**
Statement and Designation by Foreign Corporation

S&DC-S/N

FILED *Cash* / KM
 Secretary of State
 State of California
MAY 15 2018

IMPORTANT — Read instructions before completing this form.
 Must be submitted with a current **Certificate of Good Standing** issued by the government agency where the corporation was formed. See Instructions.
Filing Fee — \$100.00 (for a foreign stock corporation) or \$30.00 (for a foreign nonprofit corporation)
Copy Fees — First page \$1.00; each attachment page \$0.50; Certification Fee - \$5.00
Note: Corporations may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to <https://www.ftb.ca.gov>.

ICC This Space For Office Use Only

- 1. Corporate Name** (Go to www.sos.ca.gov/business/be/name-availability for general corporate name requirements and restrictions.)
- 2. Jurisdiction** (State, foreign country or place where this corporation is formed - must match the Certificate of Good Standing provided.)

US Health and Orthopedic Inc.	Delaware
-------------------------------	----------

3. Business Addresses (Enter the complete business addresses. Items 3a and 3b cannot be a P.O. Box or "in care of" an individual or entity.)

a. Initial Street Address of Principal Executive Office - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
200 Park Avenue South, Suite 511	New York	NY	10003
b. Street Address of Principal Office in California, if any - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
10801 National Boulevard, Suite 520	Los Angeles	CA	90064
c. Mailing Address of Principal Executive Office, if different than item 3a	City (no abbreviations)	State	Zip Code

4. Service of Process (Must provide either Individual OR Corporation.)
INDIVIDUAL – Complete Items 4a and 4b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
		CA	

CORPORATION – Complete Item 4c. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete item 4a or 4b

United Corporate Services, Inc.

5. Read and Sign Below (See instructions. Office or title not required.)
 I am a/corporate officer and am authorized to sign on behalf of the foreign corporation.

Hector Sandoval
 Signature

Hector Sandoval
 Type or Print Name

Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "US HEALTH AND ORTHOPEDIC INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FIFTEENTH DAY OF MAY, A.D. 2018.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "US HEALTH AND ORTHOPEDIC INC." WAS INCORPORATED ON THE SIXTEENTH DAY OF FEBRUARY, A.D. 2018.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL FRANCHISE TAXES HAVE BEEN ASSESSED TO DATE.



6758501 8300

SR# 20183788336

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 202698080

Date: 05-15-18

EXHIBIT 8



**State of California
Secretary of State**

F

**Statement of Information
(Foreign Corporation)**

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

**FX67120
FILED**

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

JUN-26 2018

1. CORPORATE NAME

US HEALTH AND ORTHOPEDIC INC.

2. CALIFORNIA CORPORATE NUMBER

C4149869

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.

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

6. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 4 CITY STATE ZIP CODE
PETER MAYER, ESQ. 200 PARK AVENUE SOUTH SUITE 511, NEW YORK, NY 10003

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.)

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HECTOR SANDOVAL 5435 KESTER AVENUE, SHERMAN OAKS, CA 91411

8. SECRETARY ADDRESS CITY STATE ZIP CODE
HECTOR SANDOVAL 5435 KESTER AVENUE, SHERMAN OAKS, CA 91411

9. CHIEF FINANCIAL OFFICER/ ADDRESS CITY STATE ZIP CODE
HECTOR SANDOVAL 5435 KESTER AVENUE, SHERMAN OAKS, CA 91411

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 11 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 11 must be left blank.

10. NAME OF AGENT FOR SERVICE OF PROCESS
UNITED CORPORATE SERVICES, INC.

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

Type of Business

12. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
CONSULTING SERVICES

13. THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT.

06/26/2018

PETER FRIEDRICH MAYER

ATTORNEY-AT-LAW

DATE

TYPE/PRINT NAME OF PERSON COMPLETING FORM

TITLE

SIGNATURE

EXHIBIT 9

BOARD OF CHIROPRACTIC EXAMINERS

LICENSING DETAILS FOR: 19306

NAME: TURLEY, PAUL

LICENSE TYPE: CHIROPRACTOR

LICENSE STATUS: VALID

ADDRESS

12009 WOODRANCH RD
GRANADA HILLS CA 91344
LOS ANGELES COUNTY

ISSUANCE DATE

JULY 29, 1988

EXPIRATION DATE

NOVEMBER 30, 2019

CURRENT DATE / TIME

JANUARY 24, 2019
8:37:44 AM

PUBLIC RECORDS

› THERE ARE NO PUBLIC RECORDS.

PUBLIC DOCUMENTS

› DOCUMENTS (NO RECORDS)

EXHIBIT 10

08 2018

I.

FACTUAL STATEMENT OF PAUL TURLEY

BA455469-BA455470-BA455473

Sherril R. Carter, Executive Officer/Clerk
By W. Warren Deputy
Wendy Warren

1. PT Beginning in October 2018, without any promises of leniency or other consideration, I made proffer statements with the Los Angeles County District Attorney's Office over the course of two months.
2. PT All Statements made during these proffer sessions were made in the presence of my attorney, Louis Sepe.
3. PT All statements made during these proffer sessions were truthful and based upon my personal knowledge which was acquired over many years through my personal participation, my personal observations, and my interaction and personal conversations with co-conspirators.
4. PT During these sessions I have continued to refresh my recollection of events by reviewing documents and correspondence in my possession. I have also provided corroborating documentation to the Los Angeles County District Attorney's Office.
5. PT Prior to giving my proffered statement to the Los Angeles District Attorney's Office, I consulted with my attorney Louis Sepe, and I knowingly, expressly and willingly waive my Attorney-Client Privilege and Work-Product protection and consent to the disclosure of all material related to my representation by the law firm of Bird, Marella, Boxer, Wolpert, Nessim, Drooms, Lincenberg (& Rhov), Benjamin Gluck and any Partner, Associate or Attorney working with or in association with the aforementioned Law Firm. Furthermore, I waive any Attorney-Client Privilege by virtue of individual or joint representation or based upon any actual or alleged ownership, membership, status as shareholder, board member, office holder, manager or designated representative agent, incorporator, shareholder, or any other capacity with any entity or related entity or subsidiary, actual or alleged, known or unknown, including any entities which are referenced in the current criminal prosecution and/or associated litigation, associated with Munir Uwaydah. Additionally, to the extent that I can assert or waive Attorney-Client Privilege for any entity as described above, I hereby waive that privilege on behalf of such entities. I have signed a written waiver to reflect the aforementioned.
6. PT I worked directly with Munir Uwaydah, M.D. as a named partner of Frontline Medical Associates from 2004 to 2015. It was my intention at the formation to be a partner with Dr. Uwaydah in the ownership and profits of the business.
7. PT As formed, we were supposed to share in the profits of the business and Uwaydah was to receive and keep his professional fees for surgeries performed.
8. PT However, it soon became apparent that although I was listed as a partner with 49 percent ownership in the business, I was not in fact a partner. For the first year of operation I received no salary or compensation. I had no authority or control over the

business. All decisions were made by Dr. Uwaydah who maintained absolute control over all aspects of the business.

9. PT I never received a portion of the profits, nor did I receive any actual shares or dividends. Rather, I received a regular paycheck as if I was merely a salaried employee. My salary, as with all other aspects of Frontline's finances, was controlled exclusively by Munir Uwaydah.
10. PT Frontline was not a corporation or partnership. It was simply Dr. Uwaydah's business. Frontline did not have a true Board of Directors, or Officers. Nor did Frontline have annual board meetings. Various names were placed on Secretary of State filings to give the impression that Frontline was a valid medical corporation, but these filings were false.
11. PT In 2011, at Uwaydah's direction, attorney Steven Gardner knowingly had me falsely backdate Frontline Secretary of State documents out of concern that law enforcement or insurance companies would question the validity of the corporation.
12. PT Originally, Frontline was intended to be a defense oriented medical facility that would cater to businesses or insurance firms that had injured workers. That business model did not work out and the business evolved into a patient/applicant centered operation.
13. PT The operational model was to recruit to patients through capping and maximize billing for patient services regardless of patient needs. There were certain aspects of services that were very profitable, particularly prescription medications and surgeries.
14. PT Maximizing the value of the patient included profiting from every aspect of patient care, including pharmaceuticals, MRI's, therapy and other services. This was accomplished by "referring" patients to seemingly separate companies that performed these services. However, these referrals were made to businesses that were in fact owned and controlled by Dr. Uwaydah without disclosing his ownership in the companies.
15. PT Uwaydah owned and controlled many companies and properties even though other individuals were listed as the owners or they were supposedly corporations with managing board members. This was all done intentionally so that Uwaydah could hide his ownership and his control from creditors, insurance investigators, government agencies, and law enforcement. He exercised absolute control over all of these entities. These companies included, among others, Firstline, Golden State Pharmaceuticals, Fusion, U.S. Health, Controlled Health Management, California MRI, Accounts Receivable Acquisitions, Sentinel Health Medical, LA Health Partners, Greenline Medical Management, Empyrean, Blue Oak, and La Jolla.
16. PT Uwaydah controlled purported owners, co-conspirators and others by various means including, but not limited to, manipulation, loyalty, financial incentives, fraudulent "promissory notes," litigation, and threats

17. PT Although I managed the daily operations of the San Fernando medical clinic, I had no actual authority over Frontline and had to ask Uwaydah for permission to do anything related to the company, including receive money to pay cappers. My value to Uwaydah was that I had connections to lawyers that would refer clients for a fee.
18. PT I paid various lawyers, either directly, or through intermediaries called "cappers," for illegal patient referrals to Frontline. Defendants Tony Folgar and Yolanda Grosco were "cappers" that I directly paid for illegal referrals. I knew Jeff Stevens to be a capper who was being paid cash by Marisa Nelson. I have also identified several law firms, lawyers, and their intermediaries that knowingly engaged with me in the crime of capping. With all of these individuals and firms, mutual effort would be made to conceal the payments because all parties knew the conduct was illegal. Payments would often be made in cash, in secret, and without any paper trail. We would refer to our conduct as "marketing" to mask its true illegal nature. Defendants Tatiana Arnold, Kelly Park, and Wendee Luke knew and/or facilitated this illegal scheme.
19. PT Emphasis was placed on recruiting patients that would ultimately receive surgery because it was very lucrative. Bonuses were paid to cappers for surgical patients.
20. PT Attorneys were encouraged not to settle cases until surgery was performed on the patients. Dr. Uwaydah also tried to set up a process with applicant attorneys to forward money to patients, purportedly an advance of the settlement, as an incentive to have surgery.
21. PT Jeff Stevens was a capper for attorneys Dennis Fusi and Arthur Hampton. Marisa Nelson was paying Jeff Stevens' his capping fee. The primary goal for both Tony Folgar and Jeff Stevens was to get patients into surgery.
22. PT Kelly Park gave me \$10,000.00 in cash in an envelope for me to pay cappers.
23. PT Once a patient was recruited they would be seen by a doctor or physician assistant. The patient would be prescribed medications and directed to further diagnostics or therapies with the goal of ultimately billing for surgery on the patient.
24. PT An important aspect of maximizing the value of the patient was prescription medication. The treating physicians were not given prescription pads and were not supposed to give the patients a prescription to get filled at a pharmacy of their choice. Instead, prescribed medication was limited to a formulary, and the medication would be provided by Frontline or a Uwaydah owned/controlled pharmacy and mailed to the patient.
25. PT Uwaydah determined what the formulary was and all the patients basically got the same prescriptions, regardless of their ailment.
26. PT Physicians and PA's working for Frontline were told that they must prescribe from the pre-printed prescription formulary which listed the most profitable medications, and they must not deviate. If the treating physician or PA did not prescribe all the

medications that could be justified, then it would be added on to the patients' prescriptions without the knowledge of the treating physician.

27. PT Dr. Mills and Colivas complained about the prescription formulary because they would never prescribe certain combination of medications because they conflicted and would be dangerous taken together.
28. PT Letty Lemus was Frontline's Office Manager. She also controlled the pharmaceuticals at Frontline, and was involved in the pharmacy and the prescription formulary.
29. PT Kelly Park and her sister Kim Park were in charge of the pharmaceutical billing, which they did at a house in Somis, that also served as a dog kennel. When I was at the house to pick up a dog, I saw Kelly and Kim Park and Ronnie Case there, and I also saw numerous patient files there.
30. PT There was a fire in the large garage behind the San Fernando Frontline office which stored a lot of Frontline's medical records. I saw Kelly Park at the fire scene and she told me that she was in the room looking at files and left the heater on. Documents, including patient files, were destroyed or damaged in the fire. Uwaydah also told me that Kelly had caused the fire by leaving the heater on.
31. PT Uwaydah instructed that Frontline patients be prescribed compound medications because they were very expensive and profitable.
32. PT There were certain industry procedures that were expected before surgery could be recommended. Patients were moved towards surgery through a process that included diagnostics, referrals for a surgical consult, and ultimately a recommendation for surgery.
33. PT In order to justify surgeries to insurance companies, Susan Moreno and Peter Nelson reviewed patient files that were not recommended for a surgical consult by the treating physician. They would then recommend a surgical consultation by an orthopedic surgeon.
34. PT Peter Nelson, not Uwaydah, would then do the surgical consultations which would result in a recommendation for surgery. Peter Nelson would do 90% of the surgical consultations, but Uwaydah's name was placed on all of the reports, and Frontline billed the insurance companies as if Uwaydah did the consultations.
35. PT Uwaydah would rarely see a patient unless Uwaydah needed to convince the patient to have surgery despite the patient's reluctance.
36. PT Alterations were being made to surgical reports and MRIs in order to justify authorization for surgeries, which were very lucrative, particularly spinal fusions. After Susan Moreno stopped doing the reports, Uwaydah asked me to do some surgical reports for spine cases. Uwaydah told me to put an x-ray report into a patient chart that didn't belong to that patient in order to justify authorization for the surgery.

37. PT The owners of the MRI company at San Fernando complained about a changed MRI report. When I discussed the complaints with Dr. Uwaydah, he told me that Susan Moreno receives a bonus for getting the authorizations for surgery and she would be blamed, not us.
38. PT Uwaydah subsequently purchased the MRI company from the complaining owner. Jeff Stevens was the straw purchaser of the MRI company on behalf of Dr. Uwaydah.
39. PT I knew and went along with modifying diagnoses of patients in order to maximize profits. We would maximize profits by getting the patients in the door, prescribing them as much pharmaceuticals as we could, and then move them towards surgery. The goal was to order and prescribe everything that we could possibly profit from.
40. PT Kelly Park got involved in all aspects of the business. She openly criticized me and the San Fernando office for not getting more surgeries approved. She referred to the San Fernando office as a “cancer” on the business for this failure. She succeeded in convincing Dr. Uwaydah to move the headquarters to Long Beach for that reason.
41. PT Based on my conversations with Uwaydah and Peter Nelson, it was Peter Nelson who was doing all of the shoulder and knee surgeries, not Uwaydah. Uwaydah told me that he would do the spinal surgeries, procedures near nerves, or procedures requiring surgical hardware.
42. PT At South Bay Surgical, it was known that while Uwaydah conducted numerous meetings there, Peter Nelson was doing the surgeries.
43. PT Peter Nelson conducted “surgeries” without Uwaydah’s participation or presence in the operating room. Kelly Park, Tatiana Arnold, Letty Lemus, Marisa Nelson and Shelly Rosekelly knew that Peter Nelson was the one doing surgeries.
44. PT Firstline was formed to replace Frontline. Firstline received the patients and continued to operate in the same manner as Frontline. Dr. Uwaydah’s name was taken off the company and Dr. Johnson’s was put on it instead. Eventually, my name was removed from Firstline as well.
45. PT Uwaydah attempted to gain control over the Ventura County Business Bank to facilitate access to credit and the movement of funds.
46. PT To accomplish this, Uwaydah transferred funds to purportedly independent investors to be invested in the bank on his behalf. Fraudulent documents were prepared attesting to their funds, their independence and lack of connection to the other investors. Tatiana Arnold, Kelly Park, Ronnie Case, Jeff Stevens, Mark Ieole and participated in this process and were proxy investors for Uwaydah.
47. PT I participated as a purported investor also, and invested over a million dollars of my own money. I did this to assist Uwaydah in this fraudulent scheme, and only because Uwaydah promised to buy the shares back from me.

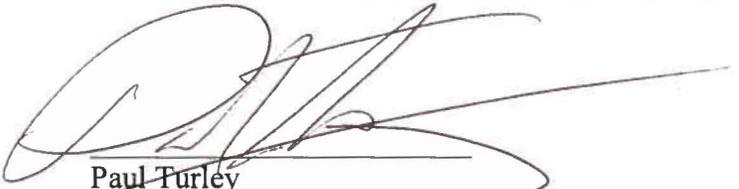
48. PI Uwaydah fled the United States to Lebanon in June of 2010 after Kelly Park was arrested for the murder of Uwaydah's former girlfriend, Juliana Redding. He later told me that he believed that Kelly Park committed the murder but that he was not personally concerned. He told me that he was worried about the ongoing fraud investigation. In the Fall of 2010, I traveled to Lebanon to confer with Uwaydah and to discuss how we were going to keep the Frontline business operating without Uwaydah's presence, and without his name being connected to the business.
49. PI After Uwaydah fled the country, he had all the servers moved to Estonia in order to prevent law enforcement from finding anything. Part of the organization is in Estonia where Wendee Luke runs the day to day operations.
50. PI In 2011, after a search warrant was executed at my home, Uwaydah flew me out to Lebanon again. This time, he suggested that I travel to Macedonia to run a medical transcription service that he owns, but is not in his name. Previously, Kelly Park and Ronnie Case were assisting Uwaydah in running this business.
51. PI Benjamin Gluck came to Macedonia to meet with me at Uwaydah's direction. to discuss his representation of both me and Frontline after the search warrant was executed on my home. We also went over capping lists and attorneys that were being paid off. I did not retain Gluck or his firm, these arrangements were all made by Uwaydah.
52. PI In 2011, when I went to Lebanon, Uwaydah told me that we had close to a billion dollars in receivables from Frontline and Firstline.
53. PI After Marisa Nelson left the organization, Tatiana Arnold took control of the books and handled the money and finances of the organization.
54. PI Tatiana Arnold told me that she was sending millions of dollars overseas.
55. PI Uwaydah purchased and controlled real estate properties and cars that were placed in my name, using my credit. This was done with my permission, but on some occasions, it was done without my knowledge or permission. My name was placed on the Somis property and on at least one car without my knowledge or consent.
56. PI Uwaydah's name is on none of the companies he owns. To my knowledge, Dr. Uwaydah was a named owner of only Frontline and Southbay Surgical. His other businesses listed false owners or fictitious boards of directors. Even though these entities were not in his name and he was not listed as an owner, or board member, he nevertheless controlled all aspects of these entities, including any litigation these companies were/are involved in. This includes the lawsuits against Marisa Nelson, Peter Nelson, and Shelly Rose Kelly, filed by attorney Benjamin Gluck and others.
57. PI Uwaydah used lawyers to set up companies, draft contracts, create fraudulent documents and file lawsuits that facilitated the fraudulent activities. Uwaydah was their client, giving them direction and paying their bills even though others, such as myself, were listed as owners or officers of the corporations.

58. PT All of the lawsuits were Uwaydah lawsuits. I was named in three or four lawsuits due to my association with Uwaydah and at no time did an attorney speak to me regarding these lawsuits, asking me what I wished to do. I never sought out or retained these lawyers. This was all arranged by Uwaydah and they received their direction from him.
59. PT Tatiana Arnold knew that Uwaydah was the true owner of the Beverly Grove property when she was supposedly representing me in a lawsuit involving that property.
60. PT Tatiana Arnold never actually represented me in any personal or private matter.
61. PT Attorneys Richard Green, Harry Nelson and Bo Thoren did not represent me in an individual or personal capacity as was written in their signed declaration provided to Benjamin Gluck and filed in court for purposes of the evidentiary hearing. I did not seek them out and they took no direction from me. These legal representations were all of Dr. Uwaydah and his interests.
62. PT Dr. Uwaydah's control extends to the current criminal defense in this case. He has paid millions of dollars for the attorneys for the defendants, including myself. Dr. Uwaydah has informed me that during these criminal proceedings, until recently, he has spoken with my attorney Benjamin Gluck on a daily basis. He clearly has been given more information about my defense and strategy than I have been. Dr. Uwaydah has told me that he has been giving direction to Gluck on how to conduct my defense. Benjamin Gluck did not tell me that he was having these conversations with Dr. Uwaydah.
63. PT An attorney from Lebanon named Victor is paying almost all of the attorneys for the co-defendants on this case, on behalf of Uwaydah and with Uwaydah's money.
64. PT While I was in jail, Uwaydah often sent money to pay my bills. Hector Sandoval would deliver up to \$5,000.00 cash for my wife or kids.
65. PT Prior to the arrests in this case, Hector Sandavol was a helper to Uwaydah who ran errands and made deliveries. It has come to my attention that Dr. Uwaydah now has Hector Sandoval listed as the current CEO of Frontline.
66. PT When I was released from custody after 25 months, Benjamin Gluck told me not to communicate with Dr. Uwaydah. I followed his instructions until recently when Dr. Uwaydah quit paying Benjamin Gluck and his firm.
67. Currently, Uwaydah wants me to call him every day. He also currently speaks to Kelly Park, Ronnie Case, Shannon Moore and Letty Lemus.
68. PT Dr. Uwaydah told me that he would think ahead and do things in order to discredit anyone who could potentially become a witness against him, his co-conspirators, or his organization.

69. PT The reason and whole point Uwaydah sued Marisa Nelson was to discredit her as a witness against Uwaydah and his organization. Uwaydah even talked to me about securing certain concessions from Marisa Nelson or Shelly Rosekelly.
70. PT The Frontline lawsuit against Marisa and Peter Nelson alleging, among other things, that they used a company credit card to pay for things without Uwaydah's approval was fraudulent and untrue.
71. PT Uwaydah told me that Susan Moreno had given a proffered statement and that he paid for Susan Moreno's attorney. In January or February of 2015, when Maria and I went to Lebanon to discuss with Uwaydah the letter we received from the DA's Office regarding a grand jury, he had a copy of Susan Moreno's hard drive and had us look through thousands of her emails to find anything that could incriminate her. We went through her emails with the specific intent to find things that would discredit her. Uwaydah and I had already discussed how Susan would be discredited as a witness.
72. PT Before I received the grand jury letter from the DA's Office, Uwaydah told me that Benjamin Gluck told him that Susan Moreno testified about surgeries in the grand jury. Uwaydah also told me that Gluck told him that Shelly Rosekelly also testified at the grand jury.
73. PT Uwaydah told me that Kelly Park, Ronnie Case, and Jeff Stevens got the same DA's Office's grand jury letter that I had received.
74. PT Benjamin Gluck claimed to represent me when the bank accounts were frozen and the storage container was seized, but this was not really true. I did not hire him. I had hired my own attorney because my personal bank account was frozen. I believe that Uwaydah made arrangements for Gluck to handle those issues for his secretly controlled companies which included Frontline/Firstline.
75. PT I was not aware of the storage unit, otherwise known as "Location 13," or its contents. I was never asked about my connection, if any, to the documents stored in Location 13 by anyone, including my attorney Benjamin Gluck.

I declare under penalty of perjury in accordance with the laws of the State of California that the aforementioned is true.

Dated: 12/3/15


Paul Turley

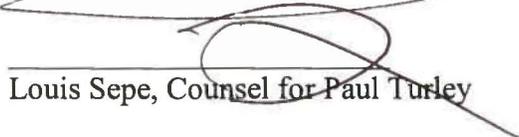

Louis Sepe, Counsel for Paul Turley

EXHIBIT 11

FILED
Superior Court of California
County of Los Angeles

DEC 03 2018

Sherril R. Carter, Executive Officer/Clerk
By W. W. Warren Deputy
Wendy Warren

1 JACKIE LACEY
2 District Attorney
3 By: DAYAN MATHAI; SBN 199621
4 Deputy District Attorney
5 211 W TEMPLE STREET, 11th Floor
6 LOS ANGELES, CA 90012
7 (213) 257-2385

8
9 **SUPERIOR COURT OF STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 PEOPLE OF THE STATE OF
12 CALIFORNIA,

13 Plaintiff,

14 v.

15 **01 PAUL TURLEY,**

16 Defendant.

17 **Case No. BA455469**

18 **AGREEMENT BETWEEN**
19 **THE PEOPLE OF THE**
20 **STATE OF CALIFORNIA**
21 **AND PAUL TURLEY**

22 Date: November 29, 2018

23 Time: 10:30 a.m.

24 Dept.: 106

25 This constitutes the plea agreement between PAUL TURLEY
26 (“defendant”) and the LOS ANGELES COUNTY DISTRICT ATTORNEY’S
27 OFFICE (“The People”) in the above-captioned case.
28

I.

**DEFINITION OF TERMS AND AGREEMENT
REGARDING INFORMATION PROVIDED BY DEFENDANT**

For purposes of this agreement: “Cooperation Information” shall mean any statements, testimony, or documents, records or other tangible evidence, or other information provided, by defendant pursuant to the fulfillment of this agreement; “Proffer Information” shall mean any statements, testimony, or documents, records or other tangible evidence, provided pursuant to the letter agreement previously entered into by the parties dated October 3, 2018 (the “Letter Agreement”); and “Plea Information” shall mean any statements made by defendant, under oath, at the guilty plea hearing and the agreed to factual statement in this agreement.

It is the understanding and intention of the People, Defendant Paul Turley and his attorney, Louis Sepe, that Cooperation Information and Plea Information provided pursuant to this agreement is provided in exchange for the agreed upon sentencing terms and with the understanding that, absent a breach by the defendant, it shall not be offered as evidence in the case-in-chief against this defendant in the above-captioned case, or any other criminal prosecution that may be brought against him.

It is also the understanding and intention of the People, Defendant Turley and his attorney, Louis Sepe, that the People may use Cooperation Information, Proffer Information and Plea Information: (1) to obtain and pursue leads to other evidence (including other sources and/or copies of documents or records provided by defendant) which may be used for any purpose, including any criminal prosecution of defendant; (2) to cross-examine defendant should he testify, or to rebut any evidence offered or

1 argument or representation made by defendant at any court proceeding; and
2 (3) in any criminal prosecution of defendant for obstruction of justice or
3 perjury.
4

5 **II.**
6 **OBLIGATIONS OF THE PEOPLE**

7
8 The PEOPLE agree to:

- 9 a.) Abide by all agreements regarding sentencing contained in this
10 agreement.
11 b.) Abide by the above understanding and the Letter Agreement regarding
12 information provided by the defendant.
13 c.) If defendant has abided by the terms of this Plea Agreement and not
14 breached any of its terms, then, at the time of sentencing, the People
15 will ask the Court to dismiss Count 98, Mayhem, and sentence the
16 defendant, per this agreement, on Count 1, Conspiracy to Commit
17 Insurance Fraud, for two years State Prison (Low Term) + 1 year for
18 Count 109 (1/3 the Mid-Term) consecutive^{+ 1 year for Count 51 (1/3 the mid-Term)} for a total term of four (4)^{consecutive}
19 years State Prison, with credit for any time served. The prison terms
20 imposed for the remaining counts will run concurrently.
21
22

23 **III.**
24 **OBLIGATIONS OF THE DEFENDANT**

25 PAUL TURLEY agrees to:

- 26 1. PT At the earliest possible opportunity, appear and plead guilty to Count
27 98 of the above captioned Complaint, which charges a violation of Penal
28 Code §203, Mayhem, for 8 years State Prison. Additionally, he will plead

1 guilty to Count 1 of the Complaint, which charges a violation of Penal
2 Code §182/550(a)(6), Conspiracy to Commit Insurance Fraud, for 2
3 years State Prison (concurrent to Count 98); and he will plead guilty to
4 Count 51 of the Complaint, which charges a violation of Penal Code
5 §549, Fraudulent Patient Referral, for 2 years State Prison (concurrent
6 to Count 98); and he will plead guilty to Count 109 of the Complaint,
7 which charges a violation of Penal Code §550(a)(6), Insurance Fraud,
8 for 2 years State Prison (concurrent to Count 98). His total term will
9 be 8-years State Prison.

10
11 2. PT At the time of the Plea, Defendant will make a factual statement under
12 oath summarizing the truthful "Proffer Information" he provided over the
13 several days of interviews. The defendant will review the written
14 summary for accuracy before making the statement. That statement will
15 be transcribed and become a permanent part of the Plea Agreement.
16

17
18 This cooperation requires defendant to:

19
20 3. PT Cooperate fully with the People and any other federal, state or local
21 prosecuting, enforcement, administrative or regulatory authority and
22 related proceedings.

23
24 4. PT Respond truthfully and completely to all questions that may be put to
25 him, whether in interviews, preliminary hearing, before a grand jury, or
26 at any trial, or post- conviction proceedings, retrial or other court
27 proceeding.
28

1 5. PT Attend all meetings, grand jury sessions, trial or other proceedings in
2 this case or related cases at which his presence is requested by the
3 People or compelled by subpoena or court order. This includes
4 specifically all named defendants in the following case numbers
5 BA455469, BA455470, BA455473, BA425397, BA435339.
6

7 6. PT Obey any other order of the court in this and related matters.
8

9 7. PT As requested, voluntarily produce documents, records or other tangible
10 evidence in his possession.
11
12

13 Defendant understands and agrees with the following:
14

15 8. PT Any knowingly false or misleading statement provided in his Proffer
16 Information, Cooperation Information, or Plea Information will subject
17 him to prosecution for obstruction of justice and perjury and will
18 constitute a breach of this agreement.
19

20 9. PT If at any time after the signature of this Plea Agreement, he knowingly
21 violates or fails to perform any of his obligations under this agreement
22 (“a breach”) and the Court finds such a breach to have occurred, then:
23 (i) at the time set for sentencing, defendant will not be able to
24 withdraw his guilty plea and admission; (ii) the People will be relieved
25 of its obligations under this Plea Agreement and the Court will impose
26 the agreed upon sentence of eight (8) years in State Prison (High Term
27 on Count 98, Mayhem) for the crimes to which defendant has pled
28

1 guilty; and (iii) the People will no longer be bound by any agreement
2 regarding the use of Cooperation Information and will be free to use
3 any Cooperation Information in any investigation or criminal
4 prosecution of defendant.

5
6 10. PT This Plea Agreement requires defendant's continued cooperation if a
7 named defendant comes within the Court's jurisdiction at any time
8 after the date set for defendant's sentencing. If on the date set for
9 defendant's sentencing, defendant is sentenced pursuant to the Plea
10 Agreement (as set forth in Section II(c), above) and, subsequently, a
11 named defendant comes within the Court's jurisdiction, the defendant
12 is still bound by the terms of this Plea Agreement. If the defendant has
13 breached this Plea Agreement, the People may reinstate the previously
14 dismissed mayhem count (Count 98) and request the Court to
15 immediately sentence defendant pursuant to this Plea Agreement (as
16 set forth in Section III (1), above), i.e. he will be sentenced to 8 years
17 State Prison for Count 98, Mayhem. The defendant waives all rights
18 to challenge any such prosecution and/or sentencing based upon
19 jurisdiction, claims of speedy trial, double jeopardy, or the statute of
20 limitations.

21
22 11. PT The People may use Proffer Information, Cooperation Information and
23 Plea Information: (1) to obtain and pursue leads to other evidence,
24 which evidence may be used for any purpose, including any criminal
25 prosecution of defendant; (2) to cross-examine defendant should he
26 testify, or to rebut any evidence offered or argument or representation
27 made by defendant at any court proceeding; and (3) in any criminal
28 prosecution of defendant for obstruction of justice or perjury.

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IV.

NATURE OF THE OFFENSE

12. PT Defendant understands that in order for defendant to be guilty of the crime in Count 98, a violation of Penal Code §203, Mayhem, the following must be true: he aided and abetted or conspired to unlawfully and maliciously deprive a human being of a member of his body, or disable, disfigure, or render it useless, or cut or disable the tongue, or put out an eye, or slit the nose, ear, or lip.

13. PT Defendant understands that for defendant to be guilty of the crime charged in Count 1, a violation of Penal Code §182/550(a)(6) (Conspiracy to Commit Insurance Fraud), the following must be true: he conspired with another person to knowingly make or cause to be made a false or fraudulent claim for payment of a health care benefit; he acted with the specific intent to defraud; and the amount of the claim, or the aggregate amount at issue was in excess of \$950.

14. PT Defendant understands that for defendant to be guilty of the crime charged in Count 51, a violation of Penal Code §549 (Fraudulent Patient Referral), the following must be true: he either in his individual capacity, or through a corporation, solicited, accepted, or referred business to or from any individual or entity with the knowledge that, or with reckless disregard for whether, the individual or entity for or from whom the solicitation or referral was made, or the individual or entity who was solicited or referred, intended to violate Penal Code Section 550 or Insurance Code Section 1871.4, or he

1 directly and actively aided and abetted or conspired with another
2 person to commit this crime.

3
4 15. PT Defendant understands that for defendant to be guilty of the crime
5 charged in Count 109, a violation of Penal Code §550(a)(6)
6 (Insurance Fraud), the following must be true: he directly and actively
7 aided and abetted or conspired with another person to knowingly
8 make or cause to be made a false or fraudulent claim for payment of a
9 health care benefit; he acted with the specific intent to defraud; and
10 the amount of the claim, or the aggregate amount at issue was in
11 excess of \$950.

12
13 Defendant understands that his sentence for the crime charged in count 98, a
14 violation of Penal Code §203 is eight (8) years imprisonment.
15 Defendant further understands that the maximum sentence for Penal
16 Code §550(a)(6), §550(a)(5) and §182/550(a)(6) is five (5) years
17 imprisonment. The defendant understands that the maximum
18 sentence will be 8 years. The principle high-term of 8 years, plus
19 subsequent counts of §550 concurrent. The defendant understands
20 that his sentence should he violate this agreement will be eight-years
21 state prison, i.e., the high term of 8 years on count 98, Mayhem.

V.

WAIVER OF CONSTITUTIONAL RIGHTS

1
2
3 15. PT Defendant understands that by pleading guilty, he gives up the
4 following rights:
5

6 16. PT The right to a preliminary hearing.
7

8 17. PT The right to a speedy and public trial by jury.
9

10 18. PT The right to a court trial.
11

12 19. PT The right to the assistance of an attorney at trial, including the right to
13 have the Court appoint an attorney to represent defendant at trial.
14 Defendant understands, however, that, despite the defendant's guilty
15 plea, defendant retains the right to be represented by an attorney, and,
16 if necessary, to have the Court appoint an attorney if defendant cannot
17 afford one, at every other stage of the proceeding.
18

19 20. PT The right to be presumed innocent and to have the burden of proof
20 placed on the People to prove defendant guilty beyond a reasonable
21 doubt.
22

23 21. PT The right to confront and cross-examine witnesses against defendant.
24

25 22. PT The right to testify on defendant's own behalf and present evidence in
26 opposition to the charges, including calling witnesses and subpoenaing
27 those witnesses to testify.
28

1 23. PT The right not to be compelled to testify, and, if defendant chose not to
2 testify or present evidence, to have that choice not be used against
3 defendant.

4
5 24. PT Any and all rights to pursue any affirmative defenses, Fourth
6 Amendment or Fifth Amendment claims, and other pretrial motions
7 that have been filed or could be filed.

8 ///

9 ///

10 CONSEQUENCES OF CONVICTION

11
12 25. PT Defendant understands that if he is convicted and sentenced pursuant to
13 this Plea Agreement, the consequences of his conviction will be:

14
15 26. PT Defendant will be sentenced to a term of three (3) years in state prison
16 if defendant abides to the terms of this agreement. However, if
17 Defendant is not in compliance to this agreement, he will serve the
18 high term of eight (8) years on Count 98, Mayhem.

19
20 27. PT The Court will order defendant to pay between \$200 and \$10,000 to the
21 Victim's Restitution Fund, as well as to pay actual restitution to any
22 victim in this case. The Court will also order defendant to pay certain
23 mandatory statutory fees and other assessments.

24
25 28. PT The Court will order defendant to provide biological samples and
26 finger and palm prints for identification purposes as required by law
27 and that failure of defendant to provide these samples and prints is a
28 new criminal offense.

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3
4 **ADDITIONAL CONSEQUENCES OF CONVICTION**
5

6 29. PT Defendant understands that if he is convicted and sentenced pursuant
7 to this Plea Agreement, the additional consequences of his conviction
8 will include:
9

10 30. PT If defendant is not a citizen of the United States, conviction of the
11 offenses charged will have the consequences of deportation, exclusion
12 from admission to the United States, or denial of naturalization
13 pursuant to the laws of the United States.
14

15 31. PT The conviction can be used to increase the penalty in future felony
16 prosecutions.
17

18 32. PT Upon his release from custody, defendant will be placed on parole for
19 a period of years. There will be terms and conditions of that parole.
20 And, defendant may be sent back to prison for violating those terms
21 and conditions.
22

23 **WAIVER OF APPEAL OF CONVICTION**
24

25 33. PT Defendant understands that, with the exception of an appeal based on
26 a claim that defendant's guilty plea and admission were involuntary,
27 by pleading guilty, defendant is waiving and giving up any right to
28

1 appeal defendant's convictions on the offenses to which defendant is
2 pleading guilty.

3
4
5 **EFFECTIVE DATE OF AGREEMENT**

6
7 34. PT This agreement is effective upon signature and execution of all
8 required certifications by defendant, defendant's counsel, the People
9 and the Court.

10
11
12 **NO ADDITIONAL AGREEMENTS**

13
14 35. PT Defendant understands that, except as set forth herein, there are no
15 promises, understandings, or agreements between the People and
16 defendant or defendant's attorney and that no additional promise,
17 understanding, or agreement may be entered into unless in a writing
18 signed by all the parties or on the record in court.

19
20 **PLEA**

21
22 36. PT Defendant has fully discussed with his attorney the charges, the
23 evidence, and the possible defenses in this case.

24
25 37. PT Defendant is pleading "Guilty" freely and voluntarily and with the full
26 understanding of all matters set forth in this Plea Agreement. No one
27 has made any threats against defendant, used any force against
28 defendant, his family or loved ones, or made any promises to

1 defendant, except as set out in this Plea Agreement, in order to
2 convince defendant to plead guilty.

3
4 38. PT Defendant is not under the influence of any substance, and is not
5 suffering from any medical or mental condition that is or may be
6 impairing his ability to enter into this Plea Agreement.

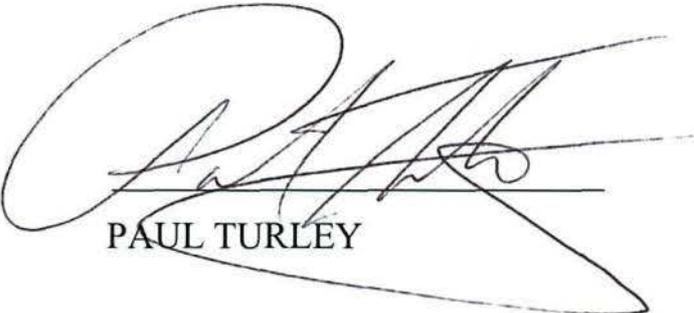
7
8 39. PT Defendant has personally and voluntarily read and initialed each of the
9 above paragraphs and discussed them with his attorney. Defendant
10 understands that each and every one of the rights outlined above and
11 hereby waives and gives up each of them in order to enter a plea of
12 guilty and admit the special allegation as described in this Plea
13 Agreement.

14
15 40. PT Defendant and the People agree that this agreement will be considered
16 part of the record of defendant's guilty plea hearing as if the entire
17 agreement had been read into the record of the proceeding.

18
19 AGREED AND ACCEPTED.

20
21 Dated:

11/29/18

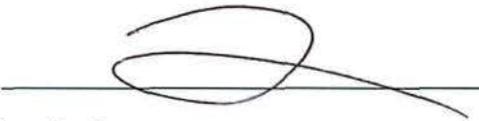

22 PAUL TURLEY

23
24
25
26 **DEFENDANT'S ATTORNEY**

27
28 I am attorney of record and I have explained each of the above rights to

1 the defendant, and having explored the facts with him and studied his possible
2 defenses to the charges, I concur in his decision to waive the above rights and
3 to enter a plea of guilty as outlined in this Plea Agreement. I stipulate that
4 there is a factual basis for this plea. I further stipulate that this document may
5 be received by the Court as evidence of defendant's voluntary, knowing,
6 intelligent waiver of these rights and that it will be filed by the clerk as a
7 permanent record of that waiver. This document consists of 13 pages and
8 represents the entire agreement among the People, my client and myself. No
9 other promises of leniency or other consideration have been made to me or
10 anyone on my behalf.
11

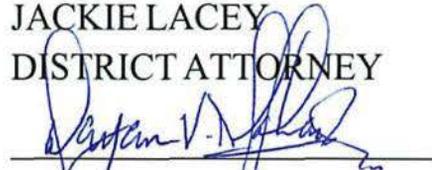
12
13 Dated: 11-29-18



Louis Sepe
Attorney for Defendant
PAUL TURLEY

14
15
16
17 Dated: 12/03/18

JACKIE LACEY
DISTRICT ATTORNEY



DAYAN V. MATHAI
DEPUTY DISTRICT ATTORNEY

EXHIBIT 12


LANGUAGE ACCESS
 English ▾

ONLINE SERVICES

Criminal Case Summary

Case Number: LACBA455469-01
 Defendant Name: TURLEY, PAUL
 Violation Date: March 1, 2011
 Filing Date: March 16, 2017
 Courthouse: Clara Shortridge Foltz Criminal Justice Center

Print

Case Information	Events	Bail	Sentencing Information
No Information Found			

[Go back](#)
[New Search](#)

Art Showcased in
Los Angeles Courthouse Jury Rooms



"Fishing" by David Sanchez
2013 - Teen 1st Place



SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

CASE NO. BA455469

v.

***FELONY COMPLAINT
FOR ARREST WARRANT***

01 PAUL TURLEY (DOB: 11/12/1962),
02 MARIA TURLEY (DOB: 03/04/1967),
03 PETER NELSON (DOB: 08/01/1971),
04 MARISA SCHERMBECK NELSON
(DOB: 11/29/1976),
aka MARISA SCHERMBECK,
05 KELLY PARK (DOB: 10/10/1965),
aka KELLY SOO PARK, and
06 TATIANA TORRES ARNOLD (DOB: 01/06/1970)
Defendant(s).

The undersigned is informed and believes that:

COUNT 1

On or between November 15, 2004 and February 20, 2015, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Insurance Fraud, in violation of Section 550(a)(6) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. **On or about November 15, 2004, MUNIR UWAYDAH and PAUL TURLEY, incorporated Frontline Medical Associates.**
2. **Between November 15, 2004, and February 20, 2015, in order to obtain patients for Frontline Medical Associates, MUNIR UWAYDAH and PAUL TURLEY paid "marketers" (aka "cappers") and attorneys for patient referrals.**
3. **Between November 15, 2004 and January 31, 2010, PETER NELSON a physician's assistant ("PA"), admitted to PA Tom Colivas that he was doing MUNIR UWAYDAH'S "surgeries" when UWAYDAH was not present. PAUL**

TURLEY admitted to PA Colivas that he was aware that NELSON was doing the purported "surgeries" that UWAYDAH should have been doing.

4. **Between November 15, 2004 and June 30, 2010, MUNIR UWAYDAH'S physician's assistant, PETER NELSON, performed purported "surgical procedures" on UWAYDAH'S patients while the patients were under general anesthesia and while UWAYDAH was not present in the operating room.**
5. **Between November 15, 2004 and December 31, 2005, PETER NELSON performed invasive fraudulent "surgical procedures" on patients Hector Gonzalez, Ernesto Prado, and Rosalinda Munoz, while these patients were under general anesthesia, and while UWAYDAH was not present.**
6. **On March 22, 2005, after being warned by the Chief of Staff of Tustin Hospital, PETER NELSON performed an invasive fraudulent "surgical procedure" on a woman at Tustin Hospital without MUNIR UWAYDAH being present in the operating room.**
7. **Between March 14, 2005 and June 30, 2010, despite being notified by the Chief of Staff of Tustin Hospital against the practice of allowing NELSON to perform surgeries, and despite being notified that the California Medical Board was investigating this practice which could cause MUNIR UWAYDAH to lose his medical license, MUNIR UWAYDAH allowed and caused PETER NELSON to perform fraudulent purported "surgical procedures" on UWAYDAH'S patients while the patients were under general anesthesia and while UWAYDAH was not present in the operating room.**
8. **Between March 1, 2005 and May 30, 2005, PETER NELSON was introduced to Constance Hicks as "Dr. Peter," and NELSON told Constance Hicks that he performed her purported "foot surgery" at Tustin Hospital because MUNIR UWAYDAH had to leave. NELSON also introduced himself to patient Manuel Jimenez as a doctor who would perform his purported "surgery."**
9. **Between May 1, 2006 and December 31, 2007, MUNIR UWAYDAH and PETER NELSON performed unnecessary "surgery" on Mario Dominguez, Mario Paloma, Joaquin Pereira and Selvin De Leon, based on no objective evidence that their injuries were indicated on their pre-operative MRI's requiring the performed "surgeries."**
10. **Between November 2004 and December 2015, Frontline Medical Associates, Firstline, South Bay Surgical, and other entities billed for fraudulent "surgeries" performed by PETER NELSON as if an orthopedic surgeon performed actual surgeries.**
11. **Between February 1, 2006, and December 31, 2008, MUNIR UWAYDAH and PAUL TURLEY made an agreement with Daniel Hitzke, a worker's compensation attorney, in which Attorney Hitzke would refer his clients to Frontline Medical Associates. The agreement included bonuses to Attorney Hitzke for each client who became a surgical candidate with additional bonuses if the client had "surgery."**
12. **Between February 1, 2006, and December 31, 2008, MUNIR UWAYDAH, PAUL**

TURLEY AND MARISA SCHERMBECK-NELSON paid cash to Attorney Daniel Hitzke in exchange for client referrals to Frontline Medical Associates.

13. **From September 1, 2006, to March 30, 2010, JEFF STEVENS referred clients from Attorney Dennis Fusi's office to Frontline Medical in exchange for money.**
14. **Between November 15, 2004 and July 30, 2010, PAUL TURLEY and MARISSA SCHERMBECK-NELSON directed Esther Ros to maintain capping lists for Frontline, which documented which attorney's office the patient came from and how much was to be paid for each patient referral.**
15. **Between January 1, 2007 and December 31, 2007, while he was employed at Frontline, Dr. Mills was directed by PAUL TURLEY and MARIA TURLEY to send all patients with positive MRI's to MUNIR UWAYDAH for "surgery."**
16. **Between January 1, 2007 and December 31, 2010, MUNIR UWAYDAH, PAUL TURLEY and MARIA TURLEY directed Susan Moreno to alter doctors' notes and reports in order to get "surgery" requests authorized by insurance companies. She was paid monetary bonuses by MARISA SCHERMBECK-NELSON on behalf of Frontline Medical Associates.**
17. **Between January 1, 2007 and June 30, 2010, KELLY PARK and RONNIE CASE and other co-conspirators, planned to and did falsify documents in preparation for MUNIR UWAYDAH'S defense in a California Medical Board investigation.**
18. **On March 26, 2007, Golden State Pharmaceuticals was incorporated by MARISA SCHERMBECK-NELSON in order to serve Frontline patients exclusively.**
19. **Between June 2007 to March 2008, MUNIR UWAYDAH told Greg Redding, a pharmacist, that he owned Golden State Pharmacy but he did not have it recorded in his name because California State law prohibits physicians from owning a pharmacy.**
20. **Between November 2004 to December 2015, MUNIR UWAYDAH, WENDEE LUKE, KELLY PARK, LETICIA ALVAREZ LEMUS, and other co-conspirators over-prescribed and over-billed insurance companies for pharmaceuticals.**
21. **Between September 11, 2007 and December 2010, under the direction of MUNIR UWAYDAH and PAUL TURLEY, Frontline Medical Associates and Golden State Pharmaceuticals used Dr. Mills' name for prescribing medications and billing without his knowledge, consent or authorization.**
22. **Between January 1, 2009 and December 31, 2010, KELLY PARK and Kim Park prepared bills for Golden State Pharmaceuticals under the direction of MUNIR UWAYDAH.**
23. **On April 17, 2007, South Bay Surgical Center was incorporated by MUNIR UWAYDAH, MARISA SCHERMBECK-NELSON and Shelly Rosekelly, for the purpose of performing purported "surgeries" on Frontline patients.**

24. **In 2009, California MRI was incorporated, with JEFF STEVENS as the owner. The business was physically located in a trailer behind Frontline Medical Associates' San Fernando clinic in order to exclusively serve Frontline patients.**
25. **Between January 1, 2009 and June 30, 2010, MARIA TURLEY told Delmy Martinez to refer all patients with minor medical issues for "surgery" authorization and to refer them only to South Bay Surgical.**
26. **Between January 1, 2009 and June 30, 2010, MARIA TURLEY directed Delmy Martinez to only include positive MRI's when seeking insurance company approval for "surgeries."**
27. **Between August 21, 2008 and December 31, 2010, MUNIR UWAYDAH, KELLY PARK and other co-conspirators planned to and did create a false arbitration agreement in the name of Jennifer Milone.**
28. **Between August 1, 2008 and December 31, 2014, MUNIR UWAYDAH caused a fraudulent billing to be filed for payment for services rendered to patient Jennifer Milone.**
29. **On February 23, 2010, Firstline Health, Inc. was incorporated and took over Frontline operations.**
30. **On or between February 23, 2010, to December 31, 2011, PAUL TURLEY, WENDEE LUKE and DAVID JOHNSON created U.S Health and Orthopedics, as a DBA of Firstline Health, Inc.**
31. **Between January 1, 2009 and December 31, 2010, MUNIR UWAYDAH, PAUL TURLEY, KELLY PARK, JEFF STEVENS, TATIANA ARNOLD, Ronnie Case, and other co-conspirators, attempted to become the majority shareholders in Ventura County Business Bank, and did buy shares in the bank.**
32. **On February 23, 2010, Firstline Health, Inc. was incorporated by TATIANA ARNOLD, MUNIR UWAYDAH'S personal lawyer, and took over Frontline Medical operations. On April 18, 2013, Firstline Health filed a Statement of Information with the California Secretary of State which listed TATIANA ARNOLD as the Assistant Treasurer of Firstline Health.**
33. **On or between February 2010, to August 2015, TATIANA ARNOLD, WENDEE LUKE and TERRY LUKE wired money from Firstline bank accounts and/or related bank accounts to Estonia, Lebanon, and other countries**
34. **Between February 10, 2010 and August 2015, TATIANA ARNOLD and Terry Luke made payments to Yolanda Groscost and/or YDG Marketing, and to Tony Folgar and/or AGD Marketing, or caused these payments to be made.**
35. **Between June 1, 2010 and December 31, 2011, Leticia Alvarez Lemus, Delmy Martinez and Jose Trujillo forged and/or wrote David Johnson's name on prescriptions for medications.**
36. **On June 17, 2010, KELLY PARK and RONNIE CASE transported 921**

prescription containers worth approximately \$82,000 street value from their home. These prescription bottles were labeled with names of patients from Golden State Pharmaceuticals and Frontline Medical Associates.

37. **Between June 22, 2007 and March 31, 2011, LETICIA ALVAREZ LEMUS and Victor Alvarez rented a storage unit in Mission Hills wherein they stored approximately 4500 containers of both controlled and non-controlled substances from LA Health Care Partners, Frontline, Firstline and/or Golden State Pharmaceuticals.**
38. **Between March 6, 2013 and August 31, 2015, Firstline Health and related entities filed false bills with Zenith Insurance Company for patient Eddie Martinez.**
39. **Between May 8, 2013, and December 31, 2014, DAVID JOHNSON and Frontline/Firstline Medical billed insurance companies for office visits which DAVID JOHNSON did not perform and for which he was not present.**
40. **Between January 1, 2014 and January 15, 2015, PAUL TURLEY told David Keller that MUNIR UWAYDAH and PAUL TURLEY were still involved in business together, even though MUNIR UWAYDAH was in Lebanon, that they were collecting on liens through U.S. Health and Orthopedics and that their involvement in the business was "silent."**
41. **Between January 1, 2014 and January 15, 2015, PAUL TURLEY solicited David Keller to engage in a capping scheme.**
42. **Between January 1, 2014 and February 28, 2015, MARIA TURLEY traveled to Beirut, Lebanon to meet with MUNIR UWAYDAH. While in Lebanon, she executed three quitclaim deeds, one to Wicklow Holdings, Inc., whose Officers included PAUL TURLEY, TATIANA ARNOLD and WENDEE LUKE, one to Connemara Holdings, Inc., and one to Notre Dame Properties L.L., whose Officers included PAUL TURLEY and TATIANA ARNOLD.**
43. **Between September 14, 2015 and October 17, 2015, Liberty Mutual and Zenith Insurance received medical billings for Dr. David Johnson for services rendered while he was in custody in the Los Angeles County Jail.**
44. **On January 21, 2016, Secretary of State documents were filed in Nevada for an active corporation and an LLC for Frontline Medical Associates, Inc., listing "MUNIR OUWAYDAH" (UWAYDAH) as the President, Treasurer and Director, along with Matt Rifat as Secretary.**
45. **On January 21, 2016, Secretary of State documents were filed in Nevada for an active corporation and an LLC for Firstline Medical Associates, Inc., listing David Johnson as the President, Treasurer and Director, along with Matt Rifat as Secretary.**
46. **Between February 17, 2012 and January 17, 2017, PETER NELSON and MARISSA SCHERMBECK-NELSON misrepresented to the U.S. Bankruptcy Trustee their relationship to MUNIR UWAYDAH and UWAYDAH controlled entities.**

47. **On or about February 20, 2014, PETER NELSON and MARISSA SCHERMBECK-NELSON caused assets to be transferred for the price of \$40,000 to a UWAYDAH controlled entity during bankruptcy proceedings.**
48. **Between June 14, 2013 and August 26, 2016, PAUL TURLEY, Ronnie Case, California Company, L.L.C., and other co-conspirators, on behalf of MUNIR UWAYDAH, sued Ventura County Business Bank and Royal Business Bank to recover alleged financial losses.**
49. **Between November 15, 2004 and March 16, 2017, PAUL TURLEY, MUNIR UWAYDAH, MARISA SCHERMBECK-NELSON, TATIANA ARNOLD, TERRY LUKE, and other Co-Conspirators established lien collection companies including, but not limited to, Ventura Business Collections and Controlled Health Management, which collected liens for fraudulent billings from UWAYDAH-controlled entities.**
50. **Between 2008 and 2015, PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISSA SCHERMBECK-NELSON, KELLY PARK, TATIANA ARNOLD, and other co-conspirators filed California tax returns that did not accurately reflect their relationship with, or income from, Frontline Medical Associates, Firstline Health, or related entities.**
51. **Between November 2004 and March 2017, MUNIR UWAYDAH and other co-conspirators, caused false or fraudulent lawsuits to be filed.**

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AGGRAVATED MAYHEM/MAYHEM

COUNT 2

On or about March 12, 2005, in the County of Los Angeles, the crime of AGGRAVATED MAYHEM, in violation of PENAL CODE SECTION 205, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON and MARISA SCHERMBECK NELSON, who did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well-being of another, intentionally cause permanent disability and disfigurement and deprivation of a limb, organ and body member of JAIME FRIAS.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 3

On or about March 2, 2009, in the County of Los Angeles, the crime of AGGRAVATED MAYHEM, in violation of PENAL CODE SECTION 205, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well-being of another, intentionally cause permanent disability and disfigurement and deprivation of a limb, organ and body member of KIMBERLY POPE.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 4

On or about March 17, 2010, in the County of Los Angeles, the crime of AGGRAVATED MAYHEM, in violation of PENAL CODE SECTION 205, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well-being of another, intentionally cause permanent disability and disfigurement and deprivation of a limb, organ and body member of JOSE AGUAYO.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 5

On or about March 17, 2010, in the County of Los Angeles, the crime of MAYHEM, in violation of PENAL CODE SECTION 203, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did unlawfully and maliciously deprive JOSE AGUAYO of a member of the body and did disable, disfigure and render it useless and did cut and disable the tongue, and put out an eye and slit the nose, ear and lip of said person. "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 6

On or about May 5, 2010, in the County of Los Angeles, the crime of AGGRAVATED MAYHEM, in violation of PENAL CODE SECTION 205, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON and KELLY PARK, who did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well-being of another, intentionally cause permanent disability and disfigurement and deprivation of a limb, organ and body member of JOSE BARRERA.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

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COUNT 7

On or about May 5, 2010, in the County of Los Angeles, the crime of MAYHEM, in violation of PENAL CODE SECTION 203, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did unlawfully and maliciously deprive JOSE BARRERA of a member of the body and did disable, disfigure and render it useless and did cut and disable the tongue, and put out an eye and slit the nose, ear and lip of said person. "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

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COUNT 8

On or about May 28, 2010, in the County of Los Angeles, the crime of AGGRAVATED MAYHEM, in violation of PENAL CODE SECTION 205, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well-being of another, intentionally cause permanent disability and disfigurement and deprivation of a limb, organ and body member of ALFONSO LOPEZ. "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

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COUNT 9

On or about May 28, 2010, in the County of Los Angeles, the crime of MAYHEM, in violation of PENAL CODE SECTION 203, a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did unlawfully and maliciously deprive ALFONSO LOPEZ of a member of the body and did disable, disfigure and render it useless and did cut and disable the tongue, and put out an eye and slit the nose, ear and lip of said person. "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

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SURGICAL BILLING FRAUD

COUNT 10

Between March 12, 2005 and February 25, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950). (Jaime Frias)

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COUNT 11

Between March 2, 2009 and February 25, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950). (Kimberly Pope)

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COUNT 12

Between December 9, 2009 and February 25, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950). (Jose Aguayo)

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COUNT 13

Between March 17, 2010 and February 25, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950). (Jose Barrera)

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COUNT 14

Between May 28, 2010 and February 25, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950). (Alfonso Lopez)

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PHARMACEUTICAL FRAUD

COUNT 15

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (American Claims Management)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 16

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Berkshire Hathaway)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 17

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (CAN Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 18

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (City of Los Angeles)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 19

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Comp West)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 20

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Employer's Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 21

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Farmer's Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 22

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Fireman's Fund Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 23

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (ICW Group Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 24

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Liberty Mutual Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 25

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Republic Indemnity)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 26

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Sedgwick Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

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COUNT 27

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Sentry Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 28

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (State Compensation Insurance Fund)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 29

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (State Farm)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 30

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (The Hartford Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 31

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Traveler's Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 32

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (York Risk Services Group)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 33

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Zenith Insurance)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 34

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Zurich North America)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

OFFICE VISIT BILLING FRAUD

COUNT 35

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (American Claims Management)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 36

On or between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a Felony, was committed by PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK and TATIANA TORRES ARNOLD, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit. (Berkshire Hathaway)

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

* * * * *

COUNT 88

On or about September 11, 2013, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 89

On or about October 14, 2013, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 90

On or about November 13, 2013, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 91

On or about December 10, 2013, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 92

On or about January 8, 2014, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 93

On or about February 10, 2014, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 94

On or about April 10, 2014, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 95

On or about May 13, 2014, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 96

On or about June 11, 2014, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 97

On or about July 19, 2014, in the County of Los Angeles, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by TATIANA TORRES ARNOLD, who did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96 and 97 that in the commission of the above offense(s) the said defendant(s), PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK, and TATIANA TORRES ARNOLD, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$3,200,000, within the meaning of Penal Code section 12022.6(a)(4).

It is further alleged, pursuant to Penal Code section 186.11(a), that the offenses set forth in counts 1-97 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(D), that, as to defendant TATIANA TORRES ARNOLD, the value of the transactions charged in Counts 60 THROUGH 76 exceeds two million five hundred thousand dollars (\$2,500,000).

It is further alleged as to count(s) 1 through 97, offenses described in Penal Code section 803(b), that no time during which prosecution of the same conduct is pending in a court of this state is a part of a limitation of time prescribed in this chapter under section 803(b) and that the People originally filed under the same facts and conduct in case BA425397 and BA435339 on September 15, 2015, and re-filed on the present case.

NOTICE: The People of the State of California intend to present evidence of other incidents where Defendants PAUL TURLEY, MARIA TURLEY, PETER NELSON, MARISA SCHERMBECK NELSON, KELLY PARK, TATIANA ARNOLD, TERRY LUKE, TONY FOLGAR, AND YOLANDA GROSCOST, along with co-conspirators committed the same crimes alleged in this Complaint, civil wrong or other act when relevant to prove some fact (such as motive, opportunity, intent, preparation, plan, knowledge, identity

or absence of mistake or accident...) other than his or her disposition to commit such an act, pursuant to Evidence Code Section 1101(b).

NOTICE: The People of the State of California request reciprocal discovery pursuant to Penal Code Section 1054.3.

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form (“PPR”) pursuant to Penal Code § 29810.

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

PAUL TURLEY BAIL: \$ _____

MARIA TURLEY BAIL: \$ _____

PETER NELSON BAIL: \$ _____

MARISA SCHERMBECK NELSON BAIL: \$ _____

KELLY PARK BAIL: \$ _____

TATIANA TORRES ARNOLD BAIL: \$ _____

DATE: _____

Judge of the Above Entitled Court

NON-WARRANT DEFENDANTS:

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
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FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

PAUL TURLEY

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
2	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
3	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
4	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
5	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
6	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
7	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
8	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
9	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
10	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
11	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

12	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
13	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
14	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
15	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
16	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
17	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
18	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
19	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
20	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
21	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
22	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
23	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
24	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
25	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

26	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
27	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
28	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
29	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
30	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
31	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
32	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
33	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
34	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
35	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
36	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
37	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
38	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
39	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

40	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
41	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
42	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
43	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
44	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
45	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
46	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
47	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
48	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
49	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
50	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
51	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
52	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
53	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

MARIA TURLEY

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
2	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
3	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
4	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
5	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
6	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
7	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
8	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
9	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
10	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
11	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
12	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
13	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
14	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4)	+4 Yrs.

15	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
16	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
17	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
18	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
19	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
20	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
21	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
22	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
23	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
24	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
25	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
26	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
27	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
28	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

			PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
29	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
30	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
31	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
32	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
33	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
34	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
35	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
36	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
37	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
38	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
39	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
40	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
41	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
42	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

43	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
44	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
45	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
46	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
47	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
48	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
49	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
50	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
51	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
52	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
53	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.

PETER NELSON

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
2	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison

3	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
4	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
5	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
6	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
7	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
8	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
9	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
10	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
11	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
12	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
13	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
14	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
15	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
16	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

17	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
18	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
19	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
20	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
21	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
22	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
23	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
24	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
25	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
26	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
27	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
28	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
29	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
30	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

31	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
32	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
33	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
34	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
35	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
36	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
37	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
38	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
39	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
40	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
41	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
42	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
43	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
44	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

45	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
46	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
47	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
48	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
49	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
50	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
51	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
52	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
53	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
56	RT 19705(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
57	RT 19706	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

MARISA SCHERMBECK NELSON

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
2	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
3	PC 205	Life State Prison	PC 12022.6(a)(4)	+4 Yrs.

4	PC 205	Life State Prison	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
5	PC 203	2-4-8 State Prison	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
6	PC 205	Life State Prison	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
7	PC 203	2-4-8 State Prison	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
8	PC 205	Life State Prison	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
9	PC 203	2-4-8 State Prison	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
10	PC 550(a)(6)	County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs County Jail
11	PC 550(a)(6)	County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
12	PC 550(a)(6)	County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
13	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
14	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
15	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
16	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
17	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

18	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
19	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
20	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
21	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
22	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
23	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
24	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
25	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
26	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
27	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
28	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
29	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
30	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
31	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

32	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
33	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
34	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
35	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
36	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
37	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
38	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
39	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
40	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
41	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
42	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
43	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
44	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
45	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

46	PC 550(a)(5)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
47	PC 550(a)(5)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
48	PC 550(a)(5)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
49	PC 550(a)(5)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
50	PC 550(a)(5)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
51	PC 549	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
52	PC 549	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
53	PC 549	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
56	RT 19705(a)	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.
57	RT 19706	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

KELLY PARK

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
3	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
4	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

5	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
6	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
7	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
8	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
9	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
10	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
11	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
12	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
13	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
14	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
15	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
16	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
17	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
18	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

19	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
20	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
21	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
22	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
23	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
24	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
25	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
26	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
27	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
28	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
29	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
30	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
31	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
32	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

33	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
34	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
35	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
36	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
37	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
38	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
39	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
40	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
41	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
42	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
43	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
44	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
45	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
46	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

47	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
48	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
49	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
50	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
51	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
52	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
53	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
54	RT 19705(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
55	RT 19705(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
58	RT 19705(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
59	RT 19706	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison

TATIANA TORRES ARNOLD

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs County Jail +2-3-5 State Prison
3	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
4	PC 205	Life State Prison	PC 12022.6(a)(4)	+4 Yrs.

5	PC 203	2-4-8 State Prison	PC 186.11(a)(2) PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
7	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
8	PC 205	Life State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
9	PC 203	2-4-8 State Prison	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
10	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs County Jail +2-3-5 State Prison +4 Yrs.
11	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
12	PC 550(a)(6)	County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
13	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
14	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
15	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
16	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
17	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
18	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
19	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

			PC 186.11(a)(2)	+2-3-5 State Prison
20	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
21	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
22	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
23	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
24	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
25	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
26	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
27	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
28	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
29	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
30	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
31	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
32	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+4 Yrs. +2-3-5 State Prison
33	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4)	+4 Yrs.

34	PC 550(a)(6)	2-3-5 County Jail	PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
35	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
36	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
37	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
38	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
39	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
40	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
41	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
42	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
43	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
44	PC 550(a)(6)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
45	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
46	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
47	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

48	PC 550(a)(5)	2-3-5 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
49	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
50	PC 550(a)(5)	2-3-5 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
51	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
52	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
53	PC 549	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
60	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
61	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
62	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
63	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
64	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
65	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
66	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
67	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4)	+4 Yrs.

68	PC 186.10(a)	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
69	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
70	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
71	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
72	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
73	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
74	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
75	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
76	PC 186.10(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
77	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
78	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
79	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
80	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs.
81	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

82	LC 3215	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
83	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
84	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
85	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
86	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
87	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
88	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
89	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
90	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
91	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
92	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
93	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
94	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
95	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4)	+2-3-5 State Prison +4 Yrs.

96	LC 3215	16-2-3 County Jail	PC 186.11(a)(2) PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison +4 Yrs.
97	LC 3215	16-2-3 County Jail	PC 12022.6(a)(4) PC 186.11(a)(2)	+2-3-5 State Prison +4 Yrs. +2-3-5 State Prison

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

PAUL TURLEY	_____	Dollars
MARIA TURLEY	_____	Dollars
PETER NELSON	_____	Dollars
MARISA SCHERMBECK NELSON	_____	Dollars
KELLY PARK	_____	Dollars
TATIANA TORRES ARNOLD	_____	Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

PAUL TURLEY _____ in Dept _____

MARIA TURLEY _____ in Dept _____

PETER NELSON _____ in Dept _____

MARISA SCHERMBECK NELSON _____ in Dept _____

KELLY PARK _____ in Dept _____

TATIANA TORRES ARNOLD _____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate

EXHIBIT 13

1932422003
FIRSTLINE HEALTH, INC.
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.

1932422003 FIRSTLINE HEALTH, INC.

<i>NPI</i>	1932422003	10-position all-numeric identification number assigned by the NPS to uniquely identify a health care provider.
<i>Entity Type</i>	Organization	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>Employer Identification Number (EIN)</i>	N/A	The Employer Identification Number (EIN), assigned by the IRS, of the provider being identified. An Employer Identification Number (EIN) is assigned by the Internal Revenue Service (IRS) to identify a business entity. It may or may not be that business entity's Taxpayer Identification Number (TIN). An SSN should not be entered in the EIN field.

<i>Is Organization Subpart</i>	N	<p>The "Is the organization a subpart?" question must be answered. If the organization is a subpart, the Parent Organization Legal Business Name (LBN) and Parent Organization Taxpayer Identification Number (TIN) fields must be completed. The Parent Organization LBN and TIN fields can only be completed if the answer to the subpart question is Yes.</p> <p>Many organization health care providers who apply for NPIs are not legal entities themselves but are parts of other organization health care providers that are legal entities (the "parents").</p> <p>Here are three examples of organization health care providers that may be considered subparts and may apply for NPIs if so directed by their "parents":</p> <p>(1) The psychiatric unit in a hospital is not a legal entity but is part of the hospital (the "parent"), which is a legal entity. The legal entity must obtain an NPI. The psychiatric unit is an example of a subpart that could have its own NPI if the hospital determines that it should.</p> <p>(2) A group practice that is not a sole proprietorship has a main location and could have other offices in different locations, but each office is not a separate legal entity; instead, each office is part of the corporation (the "parent") which is a legal entity. The offices are examples of subparts that could have their own NPIs if the main location determines that they should.</p> <p>(3) A pharmacy fills prescriptions for patients whose physicians have prescribed medications for them and may also rent or sell durable medical equipment to patients whose physicians have ordered such equipment for them. Neither the pharmacy line of business nor the DME line of business represent legal entities; instead, both lines of business are part of an organization (the "parent") that is a legal entity. Each line of business represents a different Healthcare Provider Taxonomy or area of specialization that often submits its own electronic claims to health plans.</p> <p>The "parent"-we don't know who the parent is in this example-must ensure that each subpart that submits its own claims to health plans has its own NPI.</p>
<i>Provider Organization Name (Legal Business Name)</i>	FIRSTLINE HEALTH, INC.	Provide organization name (legal business name used to file tax returns with the IRS). The Organization Name field allows the following special characters: ampersand, apostrophe, "at" sign, 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 Other Organization Name</i>	US HEALTH AND ORTHOPEDIC MEDICAL CLINICS	Other name by which the organization provider is or has been known.
<i>Provider Other Organization Name Type Code</i>	3	Code identifying the type of other name. Codes are: 1 = former name; 2 = professional name; 3 = doing business as (d/b/a) name; 4 = former legal business name; 5 = other.

<i>Provider First Line Business Mailing Address</i>	4300 LONG BEACH BLVD.	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>	SUITE 170	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>	LONG BEACH	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>	90807	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>	818-838-1606	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 Business Mailing Address Fax Number</i>	818-838-1699	The fax number associated with the mailing address of the provider being identified. This data element may contain the same information as "Provider location address fax number".
<i>Provider First Line Business Practice Location Address</i>	1023 PICO ST.	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 Business Practice Location Address City Name</i>	SAN FERNANDO	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>	91340	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>	818-838-1606	The telephone number associated with the location address of the provider being identified.
<i>Provider Business Practice Location Address Fax Number</i>	818-838-1699	The fax number associated with the location address of the provider being identified.
<i>Provider Enumeration Date</i>	03/03/2010	The date the provider was assigned a unique identifier (assigned an NPI).
<i>Last Update Date</i>	05/14/2013	The date that a record was last updated or changed.
<i>Authorized Official Last Name</i>	JOHNSON	The last name of the person authorized to submit the NPI application or to change NPS data for a health care provider.
<i>Authorized Official First Name</i>	DAVID	The first name of the authorized official
<i>Authorized Official Middle Name</i>	ROBERT	The middle name of the authorized official
<i>Authorized Official Title or Position</i>	PRESIDENT	The title or position of the authorized official
<i>Authorized Official Name Prefix Text</i>	DR.	Authorized Official Name Prefix Text
<i>Authorized Official Credential Text</i>	M.D.	Authorized Official Credential Text
<i>Authorized Official Telephone Number</i>	818-838-1606	The 10-position telephone number of the authorized official.
<i>Healthcare Provider Taxonomy Code #1</i>	2083X0100X	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>	Occupational Medicine	Healthcare Provider Taxonomy #1
<i>Provider License Number 1</i>	565939350	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>	N	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>Healthcare Provider Taxonomy Code 2</i>	208D00000X	Healthcare Provider Taxonomy Code #2
<i>Healthcare Provider Taxonomy 2</i>	General Practice	Healthcare Provider Taxonomy #2
<i>Provider License Number 2</i>	565939350	Provider License Number #2
<i>Provider License Number State Code 2</i>	CA	Provider License Number State Code #2
<i>Healthcare Provider Primary Taxonomy Switch 2</i>	N	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>Healthcare Provider Taxonomy Code 3</i>	261QP2300X	Healthcare Provider Taxonomy Code #3
<i>Healthcare Provider Taxonomy 3</i>	Primary Care	Healthcare Provider Taxonomy #3
<i>Healthcare Provider Primary Taxonomy Switch 3</i>	N	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>Healthcare Provider Taxonomy Code 4</i>	261QX0100X	Healthcare Provider Taxonomy Code #4
<i>Healthcare Provider Taxonomy 4</i>	Occupational Medicine	Healthcare Provider Taxonomy #4

<i>Healthcare Provider Primary Taxonomy Switch 4</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>Healthcare Provider Taxonomy Group 1</i>	193200000X MULTI-SPECIALTY GROUP	Healthcare Provider Taxonomy Group 1
<i>Healthcare Provider Taxonomy Group Description 1</i>	Multi-Specialty Group - A business group of one or more individual practitioners, who practice with different areas of specialization.	Healthcare Provider Taxonomy Group Description 1
<i>Healthcare Provider Taxonomy Group 2</i>	193200000X MULTI-SPECIALTY GROUP	Healthcare Provider Taxonomy Group 2
<i>Healthcare Provider Taxonomy Group Description 2</i>	Multi-Specialty Group - A business group of one or more individual practitioners, who practice with different areas of specialization.	Healthcare Provider Taxonomy Group Description 2

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