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Healthcare Finance Management, LLC & Kareem Ahmed

Exhibit #	Document
1	The People of the State of California v. Kareem Ahmed et al (Case no. 14ZF0335)
2	CA Secretary of State: Statement of Information, 12/28/2016

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

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ALAN CARLSON, Clerk of the Court
16CF1351

THE PEOPLE OF THE STATE OF CALIFORNIA,	FELONY COMPLAINT
	REFILED 14ZF0335
Plaintiff,	
vs.	No.
	OCDA WC11110008
KAREEM AHMED 11/09/68	OCDA WC14020016
U6071087	OCDA WC13050008
AKA KAREEM AHMED	OCDA WC12060007
ANDREW ROBERT JARMINSKI 10/23/62	OCDA WC15020009
V8109555	
AKA ANDREW ROBERT JARMINSKI MD	
MICHAEL RUDOLPH 02/21/50	
NORMA REYNA GARNER 03/05/72	
A1884682	
AKA NORMA REYNA RUIZ	
NORMA REYNA ARELLANO	
Defendant(s)	

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

COUNT 1: On or about February 03, 2012, in violation of Section 192(b) of the Penal Code (INVOLUNTARY MANSLAUGHTER BY LAWFUL ACT IN UNLAWFUL MANNER), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH did unlawfully and without malice kill ANDREW G.(a minor), a human being, in the commission of a lawful act which might produce death, in an unlawful manner and without due caution and circumspection.

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COUNT 2: On or about February 03, 2012, in violation of Section 192(b) of the Penal Code (INVOLUNTARY MANSLAUGHTER BY UNLAWFUL ACT), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH did unlawfully and without malice kill ANDREW G. (a minor), a human being, as a proximate result of the commission by the defendants of a noninherently dangerous felony, or non-felonious unlawful act, to wit: a violation of Section 550(a)(6) of the Penal Code Code.

COUNT 3: On or about and between October 01, 2009 and January 31, 2013, in violation of Section 550(a)(6) of the Penal Code (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH did unlawfully conspire with OTHER UNKNOWN CO-CONSPIRATORS, with the intent to defraud, to make a false and fraudulent claim to WORKERS COMPENSATION INSURANCE CARRIERS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950). It is further alleged that pursuant to and for the purpose of carrying out the objects and purposes of the conspiracy, one and more of the conspirators committed the following overt acts:

OVERT ACT 1

On or about October 1 2009, Kareem Ahmed, Evette Charbonnet, Bruce Curnick met with a pharmacist to formulate three compound transdermal creams based on the profitability of the ingredients in Orange County, California.

OVERT ACT 2

Kareem Ahmed directed his employees to identify and recruit medical providers who treated workers compensation patients to dispense and prescribe these compound transdermal creams.

OVERT ACT 3

Under the guise of purchasing the medical provider's accounts receivables, Ahmed gave financial incentives to the physicians to dispense and prescribe the compound transdermal creams he helped formulate to workers compensation patients.

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OVERT ACT 4

Between June 17, 2010 and December 31, 2012, Ahmed paid medical providers over 25 million dollar to dispense and prescribe transdermal compound creams which were primarily manufactured by pharmacists he had contracts with, namely, Curt's Compounding Pharmacy in Orange County California, and Healthcare Pharmacy in Orange County, California

OVERT ACT 5

On or about November 30, 2010, Michael Rudolph, a pharmacist, and owner of Tustin Community Pharmacy DBA Healthcare Pharmacy, in Orange County, California, entered into an agreement with Ahmed to manufacture and distribute Ahmed's compound transdermal cream formulas to workers compensation patients.

OVERT ACT 6

Ahmed gave his financial "kickback" scheme the appearance of legitimacy by requiring the medical providers and the pharmacists to sign a contract for purchase of future account receivables.

OVERT ACT 7

At Ahmed's direction, Curt's Compounding Pharmacy in Orange County, California and Healthcare Pharmacy in Orange County California, manufactured a 3-day supply of the transdermal compound cream and gave it to physicians who had a contract with Ahmed to distribute to workers compensation patients and justify the medical provider's ability to bill insurance carriers for distribution of these creams.

OVERT ACT 8

Ahmed would not purchase accounts receivables from any of the medical providers who did not also prescribe the accompanying "remaining month supply" to each workers compensation patient who was given a 3-day supply in the physician's office.

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OVERT ACT 9

Ahmed purchased accounts receivables from medical providers and paid physicians under the following companies: Physician's Funding Solution, Med-RX and Healthcare Finance Management..

OVERT ACT 10

Between June 17, 2010 and December 31, 2012, Ahmed purchased accounts receivables from Pharmacies including Healthcare Pharmacy owned by Rudolph under the following company: PharmaFinance and posted a profit of over $69 million dollars.

OVERT ACT 11

Dr. Andrew Jarminski, M.D. entered into an agreement with Ahmed in 2010 to distribute transdermal compound creams which were manufactured by Healthcare Pharmacy and Curt's Compounding Pharmacy in Orange County California.

OVERT ACT 12

Under the guise of selling his accounts receivables to Ahmed, Dr. Jarminski received kickbacks to prescribe transdermal compound creams manufactured by Healthcare Pharmacy and Curt's Compounding Pharmacy.

OVERT ACT 13

Ahmed would not purchase accounts receivables from Jarminski unless they were for prescriptions relating to transdermal compound creams Ahmed formulated and had manufactured by Healthcare Pharmacy or Curt's Compounding Pharmacy in Orange County.

OVERT ACT 14

Between 2010 and 2013, Ahmed paid Dr. Jaminski in excess of million and Nine Hundred thousand dollars ($1,900,000) because Dr. Jarminski and his physician's assistants dispensed and prescribed at least two compound creams regardless of medical necessity to each workers compensation patient he treated between 2010 and 2013.

OVERT ACT 15

The last payment issued to Andrew Jarminski by Ahmed, and his company, Healthcare Finance Management was for $3,040 on 12/28/12.

OVERT ACT 16

Between 2010 and January 2013, Ahmed paid Michael Rudolph and Healthcare Pharmacy in Orange County in excess of one million dollars ($1,000,000) to manufacture, distribute and ship transdermal compound creams to workers compensation patients.

COUNT 4: On or about and between June 17, 2011 and December 31, 2012, in violation of Section 650 of the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY, ANDREW ROBERT JARMINSKI, a person licensed under the Healing Arts Division of this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate, refund, commission, preference, patronage dividend, discount, and other consideration as compensation and inducement for referring patients, clients, and customers to CURT'S COMPOUNDING PHARMACY IN FOUNTAIN VALLEY, CALIFORNIA AND TUSTIN COMMUNITY PHARMACY INC. DBA HEALTHCARE PHARMACY.

COUNT 5: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to AIMS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 6: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to EMPLOYERS INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 7: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to HARTFORT INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 8: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to GALLAGHER BASSETT, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 9: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to ZURICH INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 10: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to AMERICAN CLAIMS MANAGEMENT, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 11: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to LIBERTY MUTUAL INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 12: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SEDGWICK, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 13: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to C.N.A. INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 14: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to FIREMAN'S FUND INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 15: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to TRISTAR, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 16: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to BERKSHIRE HATHAWAY HOMESTATE, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 17: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to STATE COMPENSATION INSURANCE FUND, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 18: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to REPUBLIC INDEMNITY INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 19: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SENTRY INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 20: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to AIG/CHARTIS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 21: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to YORK, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 22: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CRUM & FORSTER, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 23: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to FARMERS INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 24: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to MARKEL FIRST COMP INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 25: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to ICW, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 26: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to ZENITH INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 27: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SEABRIGHT INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 28: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to STATE FARM, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 29: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to EMPLOYERS INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 30: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF LOS ANGELES, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 31: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to COUNTY OF RIVERSIDE, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 32: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to VONS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 33: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to COUNTY OF SAN BERNARDINO, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 34: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to KAISER, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 35: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF GARDENA, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 36: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF SANTA MONICA, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 37: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF LONG BEACH, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 38: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF PASADENA, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 39: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF TORRANCE, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 40: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF RIVERSIDE, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 41: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF HUNTINGTON BEACH, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 42: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to COUNTY OF LOS ANGELES, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 43: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to NORDSTROM, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 44: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF GARDENA, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 45: On or about and between June 17, 2011 and December 31, 2012, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, ANDREW ROBERT JARMINSKI did unlawfully solicit, accept, and refer business to and from MED-RX, LLC AND HEALTHCARE FINANCE MANAGEMENT, LLC, with the knowledge that, and with reckless disregard for whether MED-RX, LLC AND HEALTHCARE FINANCE MANAGEMENT, LLC intended to violate Penal Code section 550 and Insurance Code section 1871.4.

COUNT 46: On or about and between June 17, 2011 and December 31, 2012, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, MICHAEL RUDOLPH did unlawfully solicit, accept, and refer business to and from PHARMAFINANCE, LLC, with the knowledge that, and with reckless disregard for whether PHARMAFINANCE, LLC intended to violate Penal Code section 550 and Insurance Code section 1871.4.

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COUNT 47: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SRS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 48: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to TRAVELERS INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 49: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to LIBERTY MUTUAL INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 50: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to ZENITH INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 51: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to EMPLOYERS INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 52: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to GALLAGHER BASSETT, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 53: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to BERKSHIRE HATHAWAY HOMESTATE COMPANIES, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 54: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to YORK, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 55: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to ZURICH INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 56: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SEDGWICH, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 57: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to ALASKA NATIONAL INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 58: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to ESIS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 59: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to C.N.A. INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 60: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to FIREMAN'S FUND, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 61: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and MICHAEL RUDOLPH, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CRUM & FORSTER, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 62: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to KAISER, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 63: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to AMERICAN CLAIMS MANAGEMENT, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 64: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SRS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 65: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to TRAVELERS INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 66: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CHUBB GROUP, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 67: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to HARTFORD, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 68: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to REPUBLIC INDEMNITY, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 69: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to STATE FARM, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 70: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CORVEL, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 71: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to FARMERS INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 72: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SENTRY INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 73: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to AIG/ CHARTIS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 74: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to STATE COMPENSATION INSURANCE FUND, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 75: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to MARKEL FIRST COMP, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 76: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to SEABRIGHT INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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COUNT 77: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to CITY OF LOS ANGELES, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 78: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to DISNEY, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 79: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to COUNTY OF SAN BERNARDINO, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 80: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to MACY'S, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 81: On or about and between September 01, 2012 and December 22, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to VONS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 82: On or about and between December 28, 2012 and December 23, 2015, in violation of Section 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED and NORMA REYNA GARNER, with the intent to defraud ZENITH INSURANCE (Maricela B.), did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, and solicit another to do the same.

COUNT 83: On or about November 19, 2015, in violation of Section 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED and NORMA REYNA GARNER, with the intent to defraud ZENITH INSURANCE (Maria A.), did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, and solicit another to do the same.

COUNT 84: On or about and between March 27, 2015 and March 31, 2016, in violation of Section 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED and NORMA REYNA GARNER, with the intent to defraud AMERICAN CLAIMS MANAGEMENT, did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, and solicit another to do the same.

COUNT 85: On or about and between June 11, 2015 and March 31, 2016, in violation of Section 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED, with the intent to defraud SEDGWICK INS., did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, and solicit another to do the same.

COUNT 86: On or about and between June 17, 2014 and April 16, 2016, in violation of Section 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED, with the intent to defraud BERKSHIRE HATHAWAY INS. CO., did knowingly and unlawfully present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, and solicit another to do the same.

COUNT 87: On or about and between June 27, 2014 and April 16, 2016, in violation of Section 550(a)(8) of the Penal Code (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED did unlawfully conspire with UNKNOWN CO-CONSPIRATORS, with the intent to defraud WORKERS COMPENSATION INSURANCE CARRIERS and present multiple claims for payment of the same health care benefit in an amount exceeding nine hundred fifty dollars ($950). It is further alleged that pursuant to and for the purpose of carrying out the objects and purposes of the conspiracy, one and more of the conspirators committed the following overt acts:

OVERT ACT 1

Kareem Ahmed generated and submitted healthcare claims to workers compensation carriers for transdermal compound creams procured by means of payment of kickbacks to physicians.

OVERT ACT 2

Ahmed paid Curt's Compounding Pharmacy in Orange County a flat fee of less than $95 for each "remaining month supply" of transdermal compound cream manufactured and shipped to a patient and submitted a substantially inflated claim for payment to workers compensation carriers in excess of $1100 for each cream.

OVERT ACT 3

At Ahmed's instructions, both Michael Rudolph and Curtis Hague did not affix the price for manufacturing each cream on the label and paperwork accompanying the transdermal compound creams shipped to each patient in order to hide the cost of manufacturing the creams from the workers compensation carriers.

OVERT ACT 4

Ahmed's company, Pharmafinance LLC, submitted claims for payment at highly inflated prices to workers compensation carriers for the transdermal compound creams manufactured and shipped to patients by Curt's Compounding Pharmacy in Orange County and Healthcare Pharmacy in Orange County.

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OVERT ACT 5

Ahmed's Company, Healthcare Finance Management, submitted claims for payment to workers compensation carriers for transdermal compound creams distributed by physicians who received kickbacks from Ahmed.

OVERT ACT 6

Ahmed instructed his staff, including Norma Garner, his collection manager, to file liens at the workers compensation appeals board for millions of dollars in false claims which were submitted to workers compensation carriers.

OVERT ACT 7

Between 6/27/14 and 12/31/15 Ahmed paid $800,000 in lien activation or filing fees to collect on over $58 millions dollars in false claims generated based on kickbacks to medical providers.

OVERT ACT 8

Ahmed employed the Blue Law Group, and Michael Blue, to aggressively collect on these false claims.

OVERT ACT 9

Ahmed instructed Norma Garner his collection manager to employ delay tactics and hide the terms of his kickback agreements with the pharmacists and the physicians because he knew that the claims would be deemed false and not paid by the workers compensation carriers if the carriers discovered that the claims were procured by using a kickback scheme.

OVERT ACT 10

Despite a Court order by the workers compensation appeals board Judge, Norma Garner and Michael Blue, at Ahmed's direction, continued to hide the terms of Ahmed's agreements with various physicians and pharmacists on 3/10/16 and 4/14/16 in Case # ADJ2262813, Applicant: Oscar Arreola in order to continue to collect on these false claims.

OTHER ALLEGATION(S)

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 and 87, it is further alleged pursuant to Penal Code section 803(b) (STATUTE OF LIMITATIONS TOLLED), that a previous prosecution of defendants KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH for the same conduct commenced within the meaning of Section 804(a), namely, an indictment or information was filed, and was pending in SUPERIOR COURT, County of ORANGE, State of California, from JUNE 18, 2014 to JUNE 3, 2016.

ENHANCEMENT(S)

It is further alleged pursuant to Penal Code section 186.11(a)(1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER $500,000), that as to counts 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 and 87, defendants KAREEM AHMED, ANDREW ROBERT JARMINSKI, MICHAEL RUDOLPH and NORMA REYNA GARNER engaged in a pattern of related fraudulent felony conduct involving the taking of more than five hundred thousand dollars ($500,000).

As to Count(s) 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 and 87, it is further alleged pursuant to Penal Code section 12022.6(a)(4) (PROPERTY DAMAGE OVER $3,200,000), that KAREEM AHMED, ANDREW ROBERT JARMINSKI, MICHAEL RUDOLPH and NORMA REYNA GARNER intentionally took, damaged, and destroyed property valued in excess of three million two hundred thousand dollars ($3,200,000) during the commission and attempted commission of the above offense.

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As to Count(s) 3, 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 and 45, it is further alleged pursuant to Penal Code section 12022.6(a)(3) (PROPERTY DAMAGE OVER $1,300,000), that ANDREW ROBERT JARMINSKI intentionally took, damaged, and destroyed property valued in excess of one million three hundred thousand dollars ($1,300,000) during the commission and attempted commission of the above offense.

As to Count(s) 85, 86 and 87, it is further alleged pursuant to Penal Code section 12022.1(b) (CRIME - BAIL - CRIME), that at the time of the commission of the above offense, defendant KAREEM AHMED was released from custody on bail and on the defendant's own recognizance on a primary felony, in case 14ZF0335.

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

Dated 05-20-2016 at Orange County, California.
KS/AC 16F01360

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: /s/ SHADDI KAMIABIPOUR
SHADDI KAMIABIPOUR, Deputy District Attorney

RESTITUTION CLAIMED

[ ] None
[ ] $_____
[X] To be determined

NOTICES:

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

16-515103

Secretary of State Statement of Information (Limited Liability Company)

150 bh

LLC-12

FILED
Secretary of State
State of California

DEC 28 2016

IMPORTANT — Read instructions before completing this form.

Filing Fee - $20.00

Copy Fees – Face Page $1.00 & .50 for each attachment page;
Certification Fee - $5.00

26/20/CC

This Space For Office Use Only

1. *Limited Liability Company Name*
HEALTHCARE FINANCE MANAGEMENT, LLC

2. 12-Digit Secretary of State File Number
201135510011

3. State or Place of Organization (only if formed outside of California)

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box 4550 ONTARIO MILLS PKWY	City (no abbreviations) ONTARIO	State CA	Zip Code 91764
b. Mailing Address of LLC, if different than item 4a	City (no abbreviations)	State	Zip Code
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 4550 ONTARIO MILLS PKWY	City (no abbreviations) ONTARIO	State CA	Zip Code 91764

5. Manager(s) or Member(s)

If no ***managers*** have been appointed or elected, provide the name and address of each ***member.*** At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: *The LLC cannot serve as its own manager or member.* If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

a. First Name, if an individual - Do not complete Item 5b KAREEM	Middle Name	Last Name AHMED	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 4550 ONTARIO MILLS PKWY	City (no abbreviations) ONTARIO	State CA	Zip Code 91764

6. Agent for Service of Process

Item 6a and 6b: If the agent is an **individual**, the agent must reside in California and Item 6a and 6b must be completed with the agent's name and California address. **Item 6c:** If the agent is a California Registered **Corporate Agent**, a current agent registration certificate must be on file with the California Secretary of State and Item 6c must be completed (leave Item 6a-6b blank).

a. California Agent's First Name (if agent is not a corporation) RICHARD	Middle Name	Last Name BRICKMAN, ESQ.	Suffix
b. Street Address (if agent is not a corporation) - Do not list a P.O. Box 13701 RIVERSIDE DRIVE #510	City (no abbreviations) SHERMAN OAKS	State CA	Zip Code 91423
c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete item 6a or 6b			

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company
BILLING & COLLECTION

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

9. **The information** contained herein, including any attachments, is true and correct.

Date	Type or Print Name of Person Completing the Form	Title	Signature
12/23/16	RICHARD BRICKMAN, ESQ.	AGENT	

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