INDEX

Heidary Chiropractic, Inc. & Peyman Heidary

Exhibit #	Document
1	People of the State of California v. Peyman Heidary et al (Case no. RIF1670175)
2	CA Secretary of State: Statement of Information, 03/26/2018

MICHAEL A. HESTRIN
District Attorney
County of Riverside
3960 Orange Street, First Floor
Riverside, California 92501
Telephone: (951) 955-5400
John Aki
Chief Assistant District Attorney
State Bar No. 189395

BAIL: Peyman Heidary $12,402,000.00
Cary D. Abramowitz $12,402,000.00
Ana Solis $12,402,000.00
Gladys Ross $12,402,000.00

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
MAY 16 2016
S. Hadley

AM
MAY 20 2016
R

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
(Riverside)

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

PEYMAN HEIDARY
DOB: 08/30/1970
AKA: BRIAN HEIDARY
AKA: THE GODFATHER
AKA: NUMBER ONE

CARY DAVID ABRAMOWITZ
DOB: 10/20/1956

ANA SOLIS
DOB: 04/24/1982

GLADYS ROSS
DOB: 7/17/1962

Defendants.

NO. RIF 1670175

INDICTMENT

AGENCY#: DAR2012258005/RDA

COUNT 1

The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 182, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, they did willfully and unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of KNOWINGLY MAKING OR CAUSING TO BE MADE ANY FALSE OR FRAUDULENT CLAIMS FOR PAYMENT OF HEALTH CARE BENEFITS, in violation of Penal Code section 550, subdivision (a), subsection (6), a felony, and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendants thereafter committed the following overt act and acts at and in the County of Riverside:

OVERT ACT NO. 1

CARY DAVID ABRAMOWITZ agreed with and allowed PEYMAN HEIDARY, a non-attorney, to exert actual control over California Injury Lawyers, AKA Orange County Law Group, and AKA South Western Law Group (collectively "the Law Firm"). PEYMAN HEIDARY controlled day-to-day operations including scheduling, hiring and firing.

OVERT ACT NO. 2

The Law Firm directed patients to clinics owned and/or controlled by PEYMAN HEIDARY.

OVERT ACT NO. 3

CARY DAVID ABRAMOWITZ, as directed by PEYMAN HEIDARY, paid Cappers $100 per patient signed up as a client of the Law Firm.

OVERT ACT NO. 4

Cappers began working for PEYMAN HEIDARY when PEYMAN HEIDARY offered Cappers a job in a new law firm opened by PEYMAN HEIDARY and Kenneth Forbes.

OVERT ACT NO. 5

Cappers had worker's compensation claimants sign blank forms, Cappers returned these forms to the Law Firm, who filled them out and submitted them, along with other paperwork, to the Worker's Compensation Appeals Board and various insurance companies.

OVERT ACT NO. 6

The Law Firm filed numerous workers' compensation claims alleging similar or identical injuries.

OVERT ACT NO. 7

Cappers sought out additional claimants from previously identified claimants.

OVERT ACT NO. 8

PEYMAN HEIDARY owned and/or controlled Riverside Health Clinic, Corona Health Clinic, Montebello Health Clinic, Bellflower Health Clinic, Santa Ana Health Clinic, and Anaheim Health Clinic.

OVERT ACT NO. 9

PEYMAN HEIDARY created the Clinics as Limited Liability Companies.

OVERT ACT NO. 10

PEYMAN HEIDARY moved unqualified, untrained employees between the Clinics and the Law Firm.

OVERT ACT NO. 11

PEYMAN HEIDARY controlled scheduling of doctors at the Clinics.

OVERT ACT NO. 12

PEYMAN HEIDARY controlled payments of the medical professionals at the Clinics.

OVERT ACT NO. 13

PEYMAN HEIDARY controlled patient care at the Clinics, including dictating treatments and referrals. He ordered his employees to ensure that each patient received the same or similar treatment and test studies regardless of injury.

OVERT ACT NO. 14

TOUBA PAKDEL-NABATI contributed to patient care at the Clinics, including dictating treatments and referrals. She ordered her employees to ensure that each patient received the same or similar treatment and test studies regardless of injury.

OVERT ACT NO. 15

QUYNAM NGUYEN received referrals for unnecessary treatment which led to the creation of med-legal reports he caused to be created which QUYNAM NGUYEN knew would later be submitted for billing.

OVERT ACT NO. 16

JASON YANG received referrals for unnecessary treatment which led to the creation of med-legal reports he caused to be created which JASON YANG knew would later be submitted for billing.

OVERT ACT NO. 17

The Clinics submitted bills and liens for treatments ordered by PEYMAN HEIDARY to insurance companies and the WCAB.

OVERT ACT NO. 18

The Law Firm received payments in part from Compromise and Releases from the WCAB and in part from legal fees billed to insurance companies.

OVERT ACT NO. 19

When PEYMAN HEIDARY hired medical and chiropractic professionals to work at the Clinics, he ordered said professionals to create a checking account with PEYMAN HEIDARY as a signatory so he could maintain control of that account. Once created, said professionals were not allowed to make any changes or withdrawals to the account without PEYMAN HEIDARY'S permission. PEYMAN HEIDARY further ordered that any payments made to said professionals be deposited in that professional's checking account and the professionals were paid out of that account.

OVERT ACT NO. 20

PEYMAN HEIDARY ordered said professionals to assign the all outstanding bills/accounts receivables to him. PEYMAN HEIDARY would then bundle the outstanding bills and sell them to third party collections and/or medical factoring firm.

COUNT 2

For a further and separate cause of action, being a different offense from but connected in its commission with the charge set forth in count 1 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from ACE, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 3

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 and 2 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the

defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from AMERICAN INTERNATIONAL GROUP (AIG), and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $65,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 4

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 3 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from BERKSHIRE/HATHAWAY, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 5

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 4 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from CNA INSURANCE, and the

claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 6

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 5 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from CALIFORNIA RESTAURANT MUTUAL BENEFITS CORPORATION (CRMBC), and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 7

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 6 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from CRUM & FORESTER, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate

amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 8

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 7 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from EMPLOYERS, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 9

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 8 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from EVEREST NATIONAL INSURANCE COMPANY (ENIC), and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars ($65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 10

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 9 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from FARMER'S, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 11

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 10 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from FIREMAN'S, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and

ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $65,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 12

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 11 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from HARTFORD, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 13

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 12 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from INSURANCE CARRIES OF THE WEST (ICW) and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6,

subdivision (a), subsection (2).

COUNT 14

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 13 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from LIBERTY MUTUAL, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $1,300,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (3).

COUNT 15

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 14 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from REPUBLIC INDEMNITY, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars ($65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 16

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 15 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from STATE COMPENSATION INSURANCE FUND (SCIF), and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $1,300,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (3).

COUNT 17

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 16 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from TRAVELER'S, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $1,300,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (3).

COUNT 18

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 17 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and

CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and 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 issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $65,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 19

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 18 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from ZURICH, and the claim and amount at issue exceeded Nine Hundred Fifty dollars ($950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars ($950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $1,300,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (3).

COUNT 20

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 19 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about

January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to ACE, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 21

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 20 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to AMERICAN INTERNATIONAL GROUP (AIG) for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $65,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 22

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 21 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to BERKSHIRE/HATHAWAY for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 23

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 22 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of

Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to CNA INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 24

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 23 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to CALIFORNIA RESTAURANT MUTUAL BENEFITS CORPORATION (CRMBC) for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 25

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 24 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to CRUM & FORESTER for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 26

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 25 hereof, the Criminal Grand

Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to EMPLOYERS INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars ($65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 27

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 26 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to EVEREST NATIONAL INSURANCE COMPANY (ENIC), for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 28

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 27 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to FARMER'S INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

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COUNT 29

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 28 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to FIREMAN'S, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars ($65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 30

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 29 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to HARFORD, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars ($65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 31

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 30 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about

January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to INSURANCE CARRIERS OF THE WEST (ICW), for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 32

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 31 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to LIBERTY MUTUAL for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 33

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 32 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to REPUBLIC INDEMNITY for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 34

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 33 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to STATE

COMPENSATION INSURANCE FUND (SCIF), for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding $200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 35

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 34 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to TRAVELERS INSURANCE, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars ($65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 36

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 35 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to ZENITH INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 37

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

in its commission with the charges set forth in counts 1 through 36 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to ZURICH for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 38

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 37 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 25, 2011, 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), to wit, a $729.333 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 39

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 38 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about April 7, 2011, 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), to wit, a $263, 651.22 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 40

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 39 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about May 20, 2011, 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), to wit, a $173,113.78 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 41

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 40 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about June 24, 2011, 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), to wit, a $143,353.87 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 42

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 41 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about July 22, 2011, 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), to wit, a $93,343.88 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 43

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 42 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about

August 25, 2011, 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), to wit, a $200;870.01 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 44

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 43 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about September 23, 2011, 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), to wit, a $204,452.35 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 45

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 44 hereof, the Criminal Grand

Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about October 26, 2011, 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), to wit, a $201,494.74 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 46

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 45 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about November 23, 2011, 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), to wit, a $165,673.92 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

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COUNT 47

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 46 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about December 22, 2011, 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), to wit, a $325,315.31 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 48

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 47 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about January 24, 2012, 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), to wit, a $288,369.74 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 49

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 48 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 24, 2012, 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), to wit, a $233,071.99 WIRE from CAREPOINT FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 50

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 49 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about March 26, 2012, 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), to wit, a $291,621.54 WIRE from CAREPOINT FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 51

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 50 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about April 20, 2012, 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), to wit, a $369,637.05 WIRE from CAREPOINT FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 52

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 51 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about September 14, 2012, 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), to wit, a $93,273.05 WIRE from JAVLIN ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 53

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 52 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about October 9, 2012, 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), to wit, a $97,075.74 WIRE from JAVLIN ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 54

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 53 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about November 9, 2012, 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), to wit, a $178,684.31 WIRE from JAVLIN ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL

IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(B).

COUNT 55

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 54 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about December 14, 2012, 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), to wit, a $129,277.35 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 56

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 55 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about December 28, 2012, 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), to wit, a $83,770.99 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 57

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 56 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about January 10, 2013, 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), to wit, a $58, 584.06 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 58

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 57 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about January 25, 2013, 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), to wit, a $45,007.01 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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 a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 58 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 8, 2013, 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), to wit, a $71,401.00 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 60

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 59 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about February 22, 2013, 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), to wit, a $140,543.25 WIRE from CAREPOINT

ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 61

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 60 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about March 11, 2013, 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), to wit, a $32,005.61 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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 62

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 61 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about April 8, 2013, 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), to wit, a $21,521.79 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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 63

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 62 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about April 23, 2013, 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), to wit, a $50,547.85 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 64

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 63 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about May 24, 2013, 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), to wit, a $82,357.60 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 65

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 64 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about June 7, 2013, 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), to wit, a $71,322.28 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 66

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 65 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about June 21, 2013, 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), to wit, a $69,115.75 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account 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, PEYMAN HEIDARY, 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), subsection (1)(A).

COUNT 67

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 66 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Business and Professions Code section 2052, subdivision (a), a felony, in that on or about and between January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendant did willfully and unlawfully practice and attempt to practice, and advertise and hold themselves out as practicing, a system and mode of treating the sick and afflicted in this state, and diagnosed, treated, operated for, and prescribed for an ailment, blemish, deformity, disease, disfigurement, disorder, injury, and other physical and mental condition of a person, without having at the time of so doing a valid, unrevoked, and unsuspended certificate as provided by the Business & Professions Code and without being authorized to perform the act pursuant to a certificate obtained in accordance with a provision of law.

COUNT 68

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 67 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS of a violation of section 549 of the Penal Code, a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants, did willfully and unlawfully solicited, accepted, or referred any business to or from any individual entity with the knowledge that, or reckless disregard for whether, the individual or entity for or from whom the solicitation or referral is made, or the individual or entity who is solicited or referred, intended to violate section 550 of the Penal Code or section 1871.4 of the Insurance Code.

COUNT 69

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 68 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ of a violation of Business and Professions Code section 6126, subdivision (a), a misdemeanor, in that on or about and between July 15,

2013 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully advertised or held himself or herself out as practicing or entitled to practice law or otherwise practiced law who is not an active member of the State Bar, or otherwise authorized pursuant to statute or court rule to practice law in this state at the time of doing so.

It is further alleged that the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, committed two or more related felonies, a material element of which was fraud or embezzlement, which involved a pattern of related felony conduct, and this pattern of related felony conduct involved the taking of more than five hundred thousand dollars ($500,000.00) within the meaning of Penal Code section 186.11, subdivision (a), subsection (2).

Special Allegation: Zamora

It is further alleged that the above offense was not discovered by the victim(s) until March 26, 2012, when the State Compensation Insurance Fund Investigator Phillis Shorts began her inquiry into suspicious circumstances of fraudulent activity.

Investigator Phillis Shorts discovered the fraudulent activity during an investigative review into three individual worker's compensation claimant files who all used the same attorney service and who were all treated by providers associated with clinics owned and operated by Peyman Heidary.

On or about August 28, 2012, SCIF Investigator Phillis Shorts referred her findings to an inter-agency team including the Office of the Riverside County District Attorney. Further investigation by the Riverside County District Attorney uncovered a highly sophisticated criminal organization. Over an approximately two year period, the investigation discovered the use of cappers, law offices, and health clinics operated by support staff, chiropractors, and medical doctors all working as directed by Peyman Heidary to bill for similar services and treatment regardless of injury.

The scheme was not discovered prior to SCIF Investigator Phillis Shorts' findings due to multiple layers of ownership and control, voluminous legal files, medical records, billing involving hundreds of patient victims, and multiple regulatory violations overseen by multiple enforcement agencies.

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The Office of the Riverside County District Attorney filed a criminal complaint in case number RIF1409778 against Peyman Heidary, Cary Abramowitz, Michael Tuosto, and Erica Torres on July 25, 2014. (*People v. Zamora* (1976) 18 Cal.3d 538.)

May 16, 2016

MICHAEL A. HESTRIN
District Attorney

JOHN AKI
Chief Assistant District Attorney

JA:tc

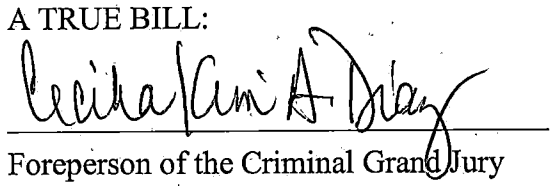
Names of witnesses examined by the Criminal Grand Jury on finding of the foregoing Indictment:

Kathan Lambert
Erica Torres
Dennis Knotts
Jennifer Delgado
Angelica Celis
Sandra Rubalcaba
Crystal Banuelos
Todd Loveless
Gissel Santibanez
Yamileth Petway
Ana Solis
Yazmine Martinez
Erica Lopez
Lany Roldan
Alejandra Palmerin
Corrine Guevara
Angelica Juarez
Perla Arroyo
Craig Johnson
Scott Adam
Clayton Johnson
Touba Pakdel-Nabati
Peter Park
Agatha Beltran
Eugene Sung
Kelly Ayers
Gladys Ross
Isidro Ramirez
Denise Rivera
Birender Singh
Jasmin Ballesteros
Oliver Glover
Janine Farrell
Daniel Gancourz

Kristian Nielson
Ronda Loyd
Danny Tran
Jill Landeros
Roger Gutierrez
Maria Kramer
Gina Gribble
Anthony Hurtado
Gordon Oard
Aaron Lewis
Phillis Shorts
Fidel Borrego
Anne Luce
Glen Smith
Don Terrell
John Auvenin
Nicole Sullivan
Chris Dill
Cynthia Becher
Yanti Soliman
Denise Magdaleno
Kurt Lackman
Sean Nealy
John Standish
David Wall
James Fisher
Kerry O'Brien
Lawrence Westcott
Quynam Nguyen
Jason Yang
Tushar Doshi
Diane Zimmerman
Jennifer Finch
James Munoz
Tamara Cooper
June Trujillo

Mercedes Hernandez
Jasmine Valadez

A TRUE BILL:



Foreperson of the Criminal Grand Jury

MICHAEL A. HESTRIN
DISTRICT ATTORNEY
County of Riverside
State of California

MICHAEL A. HESTRIN
District Attorney
County of Riverside
3960 Orange Street, First Floor
Riverside, California 92501
Telephone: (951) 955-5400
John Aki
Chief Assistant District Attorney
State Bar No. 189395

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
(Riverside)

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. PEYMAN HEIDARY DOB: 08/30/1970 AKA: BRIAN HEIDARY AKA: THE GODFATHER AKA: NUMBER ONE CARY DAVID ABRAMOWITZ DOB: 10/20/1956 ANA SOLIS DOB: 04/24/1982 GLADYS ROSS DOB: 07/17/1962 Defendants.	Case No. REQUEST/MOTION FOR PROSECUTION DISCOVERY (Pen. Code, §§ 1054.3, 1054.5(a) & (b))

TO: THE HONORABLE JUDGE OF THE SUPERIOR COURTS AND TO COUNSEL FOR ABOVE-NAMED DEFENDANTS:

PLEASE BE INFORMED that the Office of the District Attorney of Riverside County,

acting on behalf of the Plaintiff, the People of the State of California, hereby requests/moves for discovery/disclosure of the following items from the defendants and counsels in this case, pursuant to Penal Code section 1054.3(a) and (b):

1. The names and addresses of persons, other than the defendants, counsels or defendants intend to call as witnesses at trial;

2. Any relevant written or recorded statements of the persons in No. 1 above and/or reports of the statement of such persons;

3. Any reports or statement of experts made in connection with this case, including, but not limited to, the results of physical or mental examinations, scientific tests, experiments, or comparisons which the defendant or counsel intend to offer as evidence at the trial of this case; and

4. Any "real," i.e., tangible or physical, evidence which the defendant or counsel intends to offer in evidence at the trial.

PLEASE TAKE NOTE that pursuant to the provisions of Penal Code section 1054.5(b) if the above material and information requested is not provided to counsel for the plaintiff within 15 days of this request, a court order will be sought to promptly enforce the provisions of Penal Code section 1054.3.

Dated: May 16, 2016

Respectfully submitted,
MICHAEL A. HESTRIN
District Attorney

JOHN AKI
Chief Assistant District Attorney

JA:tc

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

FV50905

FILED

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

MAR-26 2018

This Space for Filing Use Only

1. **CORPORATE NAME**
HEIDARY CHIROPRACTIC, INC.

2. **CALIFORNIA CORPORATE NUMBER**
C2488925

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.)

	CITY	STATE	ZIP CODE
4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 1540 COACHWOOD STREET, LA HABRA, CA 90631			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY			
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4 HEIDARY CHIROPRACTIC, INC. P.O. BOX 5265, FULLERTON, CA 92838			

[redacted]

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.)

	ADDRESS	CITY	STATE	ZIP CODE
7. CHIEF EXECUTIVE OFFICER/ PEYMAN HEIDARY	P.O. BOX 5265, FULLERTON, CA 92838			
8. SECRETARY PEYMAN HEIDARY	P.O. BOX 5265, FULLERTON, CA 92838			
9. CHIEF FINANCIAL OFFICER/ PEYMAN HEIDARY	P.O. BOX 5265, FULLERTON, CA 92838			

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.)

	ADDRESS	CITY	STATE	ZIP CODE
10. NAME PEYMAN HEIDARY	P.O. BOX 5265, FULLERTON, CA 92838			
11. NAME				
12. NAME				

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

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS [Note: The person designated as the corporation's agent MUST have agreed to act in that capacity prior to the designation.]
PEYMAN HEIDARY

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, **IF AN INDIVIDUAL** CITY STATE ZIP CODE
1540 COACHWOOD STREET, LA HABRA, CA 90631

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
CHIROPRACTIC

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.

03/26/2018	PEYMAN HEIDARY	CEO	
DATE	TYPE/PRINT NAME OF PERSON COMPLETING FORM	TITLE	SIGNATURE