

# INDEX

Los Angeles Health Clinic, LLC & 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, 08/24/2015

1 MICHAEL A. HESTRIN  
2 District Attorney  
3 County of Riverside  
4 3960 Orange Street, First Floor  
5 Riverside, California 92501  
6 Telephone: (951) 955-5400  
7 John Aki  
8 Chief Assistant District Attorney  
9 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. Heider*

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MAY 20 2016  
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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE  
(Riverside)

15 THE PEOPLE OF THE STATE OF CALIFORNIA,

NO. RIF 1670175

17 Plaintiff,

18 v.

20 PEYMAN HEIDARY  
21 DOB: 08/30/1970  
22 AKA: BRIAN HEIDARY  
23 AKA: THE GODFATHER  
24 AKA: NUMBER ONE

INDICTMENT

26 CARY DAVID ABRAMOWITZ  
27 DOB: 10/20/1956

AGENCY#: DAR2012258005/RDA

29 ANA SOLIS  
30 DOB: 04/24/1982

32 GLADYS ROSS  
33 DOB: 7/17/1962

36 Defendants.

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.

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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

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

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

11 COUNT 4

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

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

28 COUNT 5

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

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

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

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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

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

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

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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.

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

6 COUNT 10

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

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

23 COUNT 11

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

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

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

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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,

1 subdivision (a), subsection (2).

2 COUNT 14.

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

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

19 COUNT 15

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

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

36 COUNT 16

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

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

17 COUNT 17

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

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

33 COUNT 18

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

1 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal  
2 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009  
3 through and including July 15, 2014, in the County of Riverside, State of California, the  
4 defendants did willfully and unlawfully and knowingly make and cause to be made a false and  
5 fraudulent claim for payment of a health care benefit, to wit, from ZENITH, and the claim and  
6 amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of  
7 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-  
8 month consecutive period.

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

14 COUNT 19

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

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

31 COUNT 20

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

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

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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

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

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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

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

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

14 COUNT 27

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

25 COUNT 28

26 For a further and separate cause of action, being a different offense from but connected  
27 in its commission with the charges set forth in counts 1 through 27 hereof, the Criminal Grand  
28 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and  
29 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of  
30 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about  
31 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of  
32 California, the defendants did willfully and unlawfully make and cause to be made a knowingly  
33 false and fraudulent material statement and material representation, to wit, to FARMER'S  
34 INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor  
35 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

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

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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

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

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

8 COUNT 35

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

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

24 COUNT 36

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

35 COUNT 37

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

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

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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

1 twenty-five thousand dollars (\$25,000.00), to wit, a \$263, 651.22 WIRE from VION  
2 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
3 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
4 promotion, management, establishment, or carrying on of any criminal activity; or knowing that  
5 the monetary instrument is derived directly or indirectly from criminal activity.

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

11 COUNT 40

12 For a further and separate cause of action, being a different offense from but connected  
13 in its commission with the charges set forth in counts 1 through 39 hereof, the Criminal Grand  
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
15 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
16 May 20, 2011, in the County of Riverside, State of California, the defendant did willfully,  
17 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
18 period, involving monetary instruments of a total value exceeding five thousand dollars  
19 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
20 twenty-five thousand dollars (\$25,000.00), to wit, a \$173,113.78 WIRE from VION  
21 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
22 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
23 promotion, management, establishment, or carrying on of any criminal activity, or knowing that  
24 the monetary instrument is derived directly or indirectly from criminal activity.

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

30 COUNT 41

31 For a further and separate cause of action, being a different offense from but connected  
32 in its commission with the charges set forth in counts 1 through 40 hereof, the Criminal Grand  
33 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
34 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
35 June 24, 2011, in the County of Riverside, State of California, the defendant did willfully,  
36 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day

1 period, involving monetary instruments of a total value exceeding five thousand dollars  
2 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
3 twenty-five thousand dollars (\$25,000.00), to wit, a \$143,353.87 WIRE from VION  
4 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
5 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
6 promotion, management, establishment, or carrying on of any criminal activity, or knowing that  
7 the monetary instrument is derived directly or indirectly from criminal activity.

8 It is further alleged that in the commission and attempted commission of the above  
9 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions  
10 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand  
11 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),  
12 subsection (1)(A).

13 COUNT 42

14 For a further and separate cause of action, being a different offense from but connected  
15 in its commission with the charges set forth in counts 1 through 41 hereof, the Criminal Grand  
16 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
17 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about July 22,  
18 2011, in the County of Riverside, State of California, the defendant did willfully, knowingly  
19 and unlawfully conduct a transaction, and more than one transaction in a seven day period,  
20 involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00),  
21 and more than one transaction involving monetary instruments of a total exceeding twenty-five  
22 thousand dollars (\$25,000.00), to wit, a \$93,343.88 WIRE from VION OPERATIONS LLC to  
23 BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB  
24 Account with the specific intent to promote or facilitate the promotion, management,  
25 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument  
26 is derived directly or indirectly from criminal activity.

27 It is further alleged that in the commission and attempted commission of the above  
28 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions  
29 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand  
30 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),  
31 subsection (1)(A).

32 COUNT 43

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

1 August 25, 2011, in the County of Riverside, State of California, the defendant did willfully,  
2 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
3 period, involving monetary instruments of a total value exceeding five thousand dollars  
4 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
5 twenty-five thousand dollars (\$25,000.00), to wit, a \$200,870.01 WIRE from VION  
6 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
7 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
8 promotion, management, establishment, or carrying on of any criminal activity, or knowing that  
9 the monetary instrument is derived directly or indirectly from criminal activity.

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

15 COUNT 44

16 For a further and separate cause of action, being a different offense from but  
17 connected in its commission with the charges set forth in counts 1 through 43 hereof, the  
18 Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN  
19 HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or  
20 about September 23, 2011, in the County of Riverside, State of California, the defendant did  
21 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a  
22 seven-day period, involving monetary instruments of a total value exceeding five thousand  
23 dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total  
24 exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$204,452.35 WIRE from VION  
25 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
26 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
27 promotion, management, establishment, or carrying on of any criminal activity, or knowing that  
28 the monetary instrument is derived directly or indirectly from criminal activity.

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

34 COUNT 45

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

1 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
2 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
3 October 26, 2011, in the County of Riverside, State of California, the defendant did willfully,  
4 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
5 period, involving monetary instruments of a total value exceeding five thousand dollars  
6 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
7 twenty-five thousand dollars (\$25,000.00), to wit, a \$201,494.74 WIRE from VION  
8 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
9 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
10 promotion, management, establishment, or carrying on of any criminal activity, or knowing that  
11 the monetary instrument is derived directly or indirectly from criminal activity.

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

17 COUNT 46

18 For a further and separate cause of action, being a different offense from but connected in its  
19 commission with the charges set forth in counts 1 through 45 hereof, the Criminal Grand Jury  
20 of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
21 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
22 November 23, 2011, in the County of Riverside, State of California, the defendant did willfully,  
23 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
24 period, involving monetary instruments of a total value exceeding five thousand dollars  
25 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
26 twenty-five thousand dollars (\$25,000.00), to wit, a \$165,673.92 WIRE from VION  
27 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
28 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
29 promotion, management, establishment, or carrying on of any criminal activity, or knowing that  
30 the monetary instrument is derived directly or indirectly from criminal activity.

31 It is further alleged that in the commission and attempted commission of the above  
32 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions  
33 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million  
34 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),  
35 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

1 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),  
2 subsection (1)(B).

3  
4 COUNT 49

5 For a further and separate cause of action, being a different offense from but connected  
6 in its commission with the charges set forth in counts 1 through 48 hereof, the Criminal Grand  
7 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
8 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
9 February 24, 2012, in the County of Riverside, State of California, the defendant did willfully,  
10 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
11 period, involving monetary instruments of a total value exceeding five thousand dollars  
12 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
13 twenty-five thousand dollars (\$25,000.00), to wit, a \$233,071.99 WIRE from CAREPOINT  
14 FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
15 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
16 promotion, management, establishment, or carrying on of any criminal activity, or knowing that  
17 the monetary instrument is derived directly or indirectly from criminal activity.

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

23  
24 COUNT 50

25 For a further and separate cause of action, being a different offense from but connected  
26 in its commission with the charges set forth in counts 1 through 49 hereof, the Criminal Grand  
27 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
28 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
29 March 26, 2012, in the County of Riverside, State of California, the defendant did willfully,  
30 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
31 period, involving monetary instruments of a total value exceeding five thousand dollars  
32 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
33 twenty-five thousand dollars (\$25,000.00), to wit, a \$291,621.54 WIRE from CAREPOINT  
34 FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA  
35 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the  
36 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

1 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions  
2 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million  
3 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),  
4 subsection (1)(B).

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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

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

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

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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

1 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
2 management, establishment, or carrying on of any criminal activity, or knowing that the  
3 monetary instrument is derived directly or indirectly from criminal activity.

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

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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

1 twenty-five thousand dollars (\$25,000.00), to wit, a \$83,770.99 WIRE from CAREPOINT  
2 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
3 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
4 management, establishment, or carrying on of any criminal activity, or knowing that the  
5 monetary instrument is derived directly or indirectly from criminal activity.

6 It is further alleged that in the commission and attempted commission of the above  
7 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions  
8 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand  
9 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),  
10 subsection (1)(A).

11 COUNT 57

12 For a further and separate cause of action, being a different offense from but connected  
13 in its commission with the charges set forth in counts 1 through 56 hereof, the Criminal Grand  
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
15 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
16 January 10, 2013, in the County of Riverside, State of California, the defendant did willfully,  
17 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
18 period, involving monetary instruments of a total value exceeding five thousand dollars  
19 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
20 twenty-five thousand dollars (\$25,000.00), to wit, a \$58, 584.06 WIRE from CAREPOINT  
21 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
22 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
23 management, establishment, or carrying on of any criminal activity, or knowing that the  
24 monetary instrument is derived directly or indirectly from criminal activity.

25 It is further alleged that in the commission and attempted commission of the above  
26 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions  
27 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand  
28 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),  
29 subsection (1)(A).

30 COUNT 58

31 For a further and separate cause of action, being a different offense from but connected  
32 in its commission with the charges set forth in counts 1 through 57 hereof, the Criminal Grand  
33 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
34 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
35 January 25, 2013, in the County of Riverside, State of California, the defendant did willfully,  
36 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day

1 period, involving monetary instruments of a total value exceeding five thousand dollars  
2 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
3 twenty-five thousand dollars (\$25,000.00), to wit, a \$45,007.01 WIRE from CAREPOINT  
4 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
5 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
6 management, establishment, or carrying on of any criminal activity, or knowing that the  
7 monetary instrument is derived directly or indirectly from criminal activity.

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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

1 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
2 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
3 management, establishment, or carrying on of any criminal activity, or knowing that the  
4 monetary instrument is derived directly or indirectly from criminal activity.

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

10 COUNT 61

11 For a further and separate cause of action, being a different offense from but connected  
12 in its commission with the charges set forth in counts 1 through 60 hereof, the Criminal Grand  
13 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
14 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
15 March 11, 2013, in the County of Riverside, State of California, the defendant did willfully,  
16 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
17 period, involving monetary instruments of a total value exceeding five thousand dollars  
18 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
19 twenty-five thousand dollars (\$25,000.00), to wit, a \$32,005.61 WIRE from CAREPOINT  
20 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
21 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
22 management, establishment, or carrying on of any criminal activity, or knowing that the  
23 monetary instrument is derived directly or indirectly from criminal activity.

24 COUNT 62

25 For a further and separate cause of action, being a different offense from but connected  
26 in its commission with the charges set forth in counts 1 through 61 hereof, the Criminal Grand  
27 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
28 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
29 April 8, 2013, in the County of Riverside, State of California, the defendant did willfully,  
30 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
31 period, involving monetary instruments of a total value exceeding five thousand dollars  
32 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
33 twenty-five thousand dollars (\$25,000.00), to wit, a \$21,521.79 WIRE from CAREPOINT  
34 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
35 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
36 management, establishment, or carrying on of any criminal activity, or knowing that the

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

2 COUNT 63

3 For a further and separate cause of action, being a different offense from but connected  
4 in its commission with the charges set forth in counts 1 through 62 hereof, the Criminal Grand  
5 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
6 violation of Penal Code section 186.10, subdivision (a); a felony, in that on or about  
7 April 23, 2013, in the County of Riverside, State of California, the defendant did willfully,  
8 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
9 period, involving monetary instruments of a total value exceeding five thousand dollars  
10 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
11 twenty-five thousand dollars (\$25,000.00), to wit, a \$50,547.85 WIRE from CAREPOINT  
12 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
13 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
14 management, establishment, or carrying on of any criminal activity, or knowing that the  
15 monetary instrument is derived directly or indirectly from criminal activity.

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

21 COUNT 64

22 For a further and separate cause of action, being a different offense from but connected  
23 in its commission with the charges set forth in counts 1 through 63 hereof, the Criminal Grand  
24 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a  
25 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about  
26 May 24, 2013, in the County of Riverside, State of California, the defendant did willfully,  
27 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day  
28 period, involving monetary instruments of a total value exceeding five thousand dollars  
29 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding  
30 twenty-five thousand dollars (\$25,000.00), to wit, a \$82,357.60 WIRE from CAREPOINT  
31 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL  
32 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,  
33 management, establishment, or carrying on of any criminal activity, or knowing that the  
34 monetary instrument is derived directly or indirectly from criminal activity.

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

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

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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.

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

6 COUNT 67

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

20 COUNT 68

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

31 COUNT 69

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

1 2013 through and including July 15, 2014, in the County of Riverside, State of California,  
2 the defendants did willfully and unlawfully advertised or held himself or herself out as  
3 practicing or entitled to practice law or otherwise practiced law who is not an active member  
4 of the State Bar, or otherwise authorized pursuant to statute or court rule to practice law in  
5 this state at the time of doing so.

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

12 **Special Allegation: Zamora**

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

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

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

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

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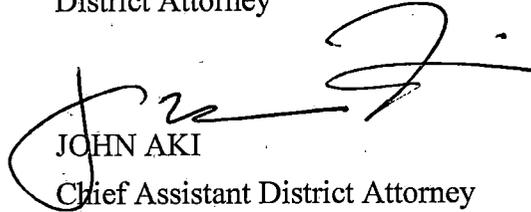
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The Office of the Riverside County District Attorney filed a criminal complaint in case number RIF1409778 against Peyman Heidary, Cary Abramowitz, Michael Tuosto, and Erica Torres on July 25, 2014. (*People v. Zamora* (1976) 18 Cal.3d 538.)

May 16, 2016

MICHAEL A. HESTRIN  
District Attorney



JOHN AKI  
Chief Assistant District Attorney

JA:tc

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

3 Kathan Lambert

4 Erica Torres

5 Dennis Knotts

6 Jennifer Delgado

7 Angelica Celis

8 Sandra Rubalcaba

9 Crystal Banuelos

10 Todd Loveless

11 Gissel Santibanez

12 Yamileth Petway

13 Ana Solis

14 Yazmine Martinez

15 Erica Lopez

16 Lany Roldan

17 Alejandra Palmerin

18 Corrine Guevara

19 Angelica Juarez

20 Perla Arroyo

21 Craig Johnson

22 Scott Adam

23 Clayton Johnson

24 Toubha Pakdel-Nabati

25 Peter Park

26 Agatha Beltran

27 Eugene Sung

28 Kelly Ayers

29 Gladys Ross

30 Isidro Ramirez

31 Denise Rivera

32 Birender Singh

33 Jasmin Ballesteros

34 Oliver Glover

35 Janine Farrell

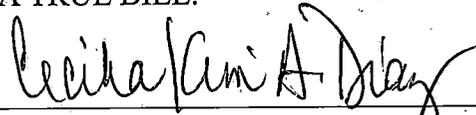
36 Daniel Gancourz

- 1 Kristian Nielson
- 2 Ronda Loyd
- 3 Danny Tran
- 4 Jill Landeros
- 5 Roger Gutierrez
- 6 Maria Kramer
- 7 Gina Gribble
- 8 Anthony Hurtado
- 9 Gordon Oard
- 10 Aaron Lewis
- 11 Phillis Shorts
- 12 Fidel Borrego
- 13 Anne Luce
- 14 Glen Smith
- 15 Don Terrell
- 16 John Auenin
- 17 Nicole Sullivan
- 18 Chris Dill
- 19 Cynthia Becher
- 20 Yanti Soliman
- 21 Denise Magdaleno
- 22 Kurt Lackman
- 23 Sean Nealy
- 24 John Standish
- 25 David Wall
- 26 James Fisher
- 27 Kerry O'Brien
- 28 Lawrence Westcott
- 29 Quynam Nguyen
- 30 Jason Yang
- 31 Tushar Doshi
- 32 Diane Zimmerman
- 33 Jennifer Finch
- 34 James Munoz
- 35 Tamara Cooper
- 36 June Trujillo

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Mercedes Hernandez  
Jasmine Valadez

A TRUE BILL:



Foreperson of the Criminal Grand Jury

1 MICHAEL A. HESTRIN  
2 District Attorney  
3 County of Riverside  
4 3960 Orange Street, First Floor  
5 Riverside, California 92501  
6 Telephone: (951) 955-5400  
7 John Aki  
8 Chief Assistant District Attorney  
9 State Bar No. 189395

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

15 THE PEOPLE OF THE STATE OF CALIFORNIA,  
16 Plaintiff,

17 v.

18 PEYMAN HEIDARY  
19 DOB: 08/30/1970  
20 AKA: BRIAN HEIDARY  
21 AKA: THE GODFATHER  
22 AKA: NUMBER ONE

24 CARY DAVID ABRAMOWITZ  
25 DOB: 10/20/1956

27 ANA SOLIS  
28 DOB: 04/24/1982

30 GLADYS ROSS  
31 DOB: 07/17/1962

32 Defendants.

Case No.

REQUEST/MOTION FOR  
PROSECUTION DISCOVERY  
(Pen. Code, §§ 1054.3,  
1054.5(a) & (b))

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

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

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

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

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

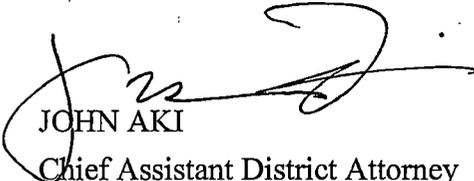
8 3. Any reports or statement of experts made in connection with this case, including, but  
9 not limited to, the results of physical or mental examinations, scientific tests, experiments, or  
10 comparisons which the defendant or counsel intend to offer as evidence at the trial of this case;  
11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

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

14 PLEASE TAKE NOTE that pursuant to the provisions of Penal Code section 1054.5(b) if  
15 the above material and information requested is not provided to counsel for the plaintiff within  
16 15 days of this request, a court order will be sought to promptly enforce the provisions of Penal  
17 Code section 1054.3.

18  
19 Dated: May 16, 2016

20  
21 Respectfully submitted,  
22 MICHAEL A. HESTRIN  
23 District Attorney

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28 JOHN AKI  
29 Chief Assistant District Attorney

30 JA:tc  
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# State of California Secretary of State

L

## STATEMENT OF INFORMATION (Limited Liability Company)

12  
1/13

Filing Fee \$20.00. If this is an amendment, see instructions.

**FILED**  
Secretary of State  
State of California  
AUG 24 2015

**IMPORTANT — READ INSTRUCTIONS BEFORE COMPLETING THIS FORM**

1. LIMITED LIABILITY COMPANY NAME  
LOS ANGELES HEALTH CLINIC, LLC.

This Space For Filing Use Only

### File Number and State or Place of Organization

2. SECRETARY OF STATE FILE NUMBER  
201328910496

3. STATE OR PLACE OF ORGANIZATION (If formed outside of California)

### No Change Statement

4. 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 15.

### Complete Addresses for the Following (Do not abbreviate the name of the city. Items 5 and 7 cannot be P.O. Boxes.)

5. STREET ADDRESS OF PRINCIPAL OFFICE	CITY	STATE	ZIP CODE
1301 DOVE STREET, SUITE 800	NEWPORT BEACH	CA.	92660
6. MAILING ADDRESS OF LLC, IF DIFFERENT THAN ITEM 5	CITY	STATE	ZIP CODE
P.O. BOX 5265	FULLERTON	CA.	92838
7. STREET ADDRESS OF CALIFORNIA OFFICE	CITY	STATE	ZIP CODE
1301 DOVE STREET, SUITE 800	NEWPORT BEACH	CA	92660

### Name and Complete Address of the Chief Executive Officer, If Any

8. NAME	ADDRESS	CITY	STATE	ZIP CODE
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### Name and Complete Address of Any Manager or Managers, or if None Have Been Appointed or Elected, Provide the Name and Address of Each Member (Attach additional pages, if necessary.)

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

**Agent for Service of Process** If the agent is an individual, the agent must reside in California and Item 13 must be completed with a California address, a P.O. Box is not acceptable. If the agent is a corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 13 must be left blank.

12. NAME OF AGENT FOR SERVICE OF PROCESS  
MICHAEL J. KHOURI, ESQ.

13. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE	ZIP CODE
4040 BARRANCA PARKWAY, SUITE 280	IRVINE	CA	92604

### Type of Business

14. DESCRIBE THE TYPE OF BUSINESS OF THE LIMITED LIABILITY COMPANY  
INTELLECTUAL PROPERTY AND INVESTMENTS

15. THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

8/18/2015

PEYMAN HEIDARY

MANAGER

DATE

TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM

TITLE

SIGNATURE