

# INDEX

Mannie Joel, M.D., Inc. & Mannie Joel

Exhibit #	Document
1	People of the State of California v. Mannie Joel (Case no. 17CF0812)
2	CA Secretary of State: Statement of Information, 05/16/2005

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

**ELECTRONICALLY FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE

04/03/2017  
09:46 AM

DAVID H. YAMASAKI, Clerk of the Court  
**17CF0812**

6 THE PEOPLE OF THE STATE OF CALIFORNIA, ) **FELONY COMPLAINT**  
7 ) **WARRANT**  
8 Plaintiff, )  
9 )  
10 vs. ) **No.**  
11 MANNIE JOEL 09/30/49 ) OCDA WC16070011  
12 C1045701 ) OCDA WC15040015  
13 ) OCDA HF12110001  
14 )  
15 Defendant(s))

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

16 COUNT 1: On or about and between December 14, 2012 and June 11,  
17 2015, in violation of Section 550(a)(6) of the Penal Code  
18 (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, MANNIE  
19 JOEL did unlawfully conspire with TANYA MORELAND KING AND  
20 CHRISTOPHER KING AND OTHER UNKNOWN INDIVIDUALS, with the intent  
21 to defraud, to make a false and fraudulent claim to WORKERS  
22 COMPENSATION INSURANCE CARRIERS IN CALIFORNIA for payment of a  
23 health care benefit in an amount exceeding nine hundred fifty  
24 dollars (\$950). It is further alleged that pursuant to and for  
25 the purpose of carrying out the objects and purposes of the  
26 conspiracy, one and more of the conspirators committed the  
27 following overt acts:

24 OVERT ACT 1

26 On or about 12/14/12, Defendant MANNIE JOEL, M.D., entered into  
27 an agreement with TANYA MORELAND KING, CHRISTOPHER KING and  
28 their companies, King Medical Management Inc. and Monarch  
Medical Group Inc.

/

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

OVERT ACT 2

King Medical Management formulated and paid for a 3-day supply of the compound transdermal creams manufactured by Steven's Pharmacy, located in Costa Mesa, in the County of Orange, and arranged for Steven's Pharmacy to ship these creams to Defendant MANNIE JOEL, M.D.

OVERT ACT 3

Defendant MANNIE JOEL, M.D., prescribed the transdermal compound creams manufactured by Steven's Pharmacy to his workers compensation patients.

OVERT ACT 4

Defendant MANNIE JOEL, M.D., did not customize these compound transdermal creams to each workers' compensation patient and used the formula given to him by Monarch Medical Group.

OVERT ACT 5

Defendant MANNIE JOEL, M.D., then provided the billing information for each workers' compensation patient to King Medical Management Inc. to bill for the dispensing of these creams from his office.

OVERT ACT 6

King Medical Management Inc. billed workers' compensation carriers in excess of \$190 per cream even though the cream only cost \$16.

OVERT ACT 7

From 12/14/12 to 3/14/14, King Medical Management Inc., paid Defendant MANNIE JOEL, M.D., \$50 per compound cream dispensed to his workers' compensation patients.

/

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

OVERT ACT 8

From 3/14/14 to 6/11/15, King Medical Management Inc., paid Defendant MANNIE JOEL, M.D., 95% of the profits from the amount collected from the workers compensation carrier for each of the 3-day of the compound creams he dispensed to his workers' compensation patients.

OVERT ACT 9

In return for the money he received from the billing on the 3-day supply of the transdermal creams, Defendant MANNIE JOEL, M.D., was also required to write a prescription for the 30-day supply of transdermal compound creams which were shipped directly to his workers' compensation patients by Steven's Pharmacy in Costa Mesa, located in the County of Orange.

OVERT ACT 10

In order to give the appearance of legitimacy to the compounded transdermal creams that Defendant MANNIE JOEL, M.D., prescribed to his patients, on 3/19/15 he signed a letter that Monarch Medical Group provided to him, which he did not prepare himself, purporting to give instructions to the pharmacy and customize the formula for the compound creams.

OVERT ACT 11

Monarch Medical Group then billed the workers' compensation insurance carriers well in excess of \$700 for each compounded transdermal cream that was shipped by Steven's Pharmacy, located in Costa Mesa, to each of Defendant MANNIE JOEL's patients, even though Monarch Medical Group only paid Steven's Pharmacy \$40 per compound cream to manufacture.

OVERT ACT 12

Between 12-14-12 and 8-12-15, Monarch Medical Group and King Medical Management paid Defendant MANNIE JOEL, M.D., in excess of \$26,000 and at least one payment was issued in the amount of \$1376.19 on 2/11/15 on Check #6543.

/

/



1 COUNT 5: On or about and between April 08, 2013 and March 03,  
2 2014, in violation of Section 550(b)(3) of the Penal Code  
3 (INSURANCE FRAUD), a FELONY, MANNIE JOEL, with the intent to  
4 defraud, did unlawfully conceal and knowingly fail to disclose,  
5 and did knowingly assist with another person to conceal and fail  
6 to disclose the occurrence of an event and a fact that affected  
7 the initial and continued material right and entitlement of  
8 BERKSHIRE HATHAWAY HOMESTEAD COMPANIES to an insurance benefit  
9 and payment, and to the amount of a benefit and payment to which  
BERKSHIRE HATHAWAY HOMESTEAD COMPANIES was entitled, namely:  
DEFENDANT HAD A FINANCIAL INTEREST IN AND RECEIVED FINANCIAL  
INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO HIS WORKERS  
COMPENSATION PATIENTS. (PATIENTS ROXAS AND FITZMAURICE).

10 COUNT 6: On or about and between April 04, 2013 and March 11,  
11 2014, in violation of Section 550(b)(3) of the Penal Code  
12 (INSURANCE FRAUD), a FELONY, MANNIE JOEL, with the intent to  
13 defraud, did unlawfully conceal and knowingly fail to disclose,  
14 and did knowingly assist with another person to conceal and fail  
15 to disclose the occurrence of an event and a fact that affected  
16 the initial and continued material right and entitlement of  
17 FARMERS INS. to an insurance benefit and payment, and to the  
18 amount of a benefit and payment to which FARMERS INS. was  
entitled, namely: DEFENDANT HAD A FINANCIAL INTEREST IN AND  
RECEIVED FINANCIAL INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO  
HIS WORKERS' COMPENSATION PATIENTS. (PATIENTS: MICHAEL S. AND  
DON M.).

19 COUNT 7: On or about October 10, 2013, in violation of Section  
20 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, MANNIE  
21 JOEL, with the intent to defraud, did unlawfully conceal and  
22 knowingly fail to disclose, and did knowingly assist with  
23 another person to conceal and fail to disclose the occurrence of  
24 an event and a fact that affected the initial and continued  
25 material right and entitlement of STATE COMPENSATION INSURANCE  
26 FUND to an insurance benefit and payment, and to the amount of a  
27 benefit and payment to which STATE COMPENSATION INSURANCE FUND  
was entitled, namely: DEFENDANT HAD A FINANCIAL INTEREST IN AND  
RECEIVED FINANCIAL INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO  
HIS WORKERS' COMPENSATION PATIENTS.

28 /  
/  
/

1 COUNT 8: On or about and between September 10, 2013 and July  
2 24, 2014, in violation of Section 550(b)(3) of the Penal Code  
3 (INSURANCE FRAUD), a FELONY, MANNIE JOEL, with the intent to  
4 defraud, did unlawfully conceal and knowingly fail to disclose,  
5 and did knowingly assist with another person to conceal and fail  
6 to disclose the occurrence of an event and a fact that affected  
7 the initial and continued material right and entitlement of THE  
8 HARTFORD FINANCIAL SERVICES to an insurance benefit and payment,  
9 and to the amount of a benefit and payment to which THE HARTFORD  
10 FINANCIAL SERVICES was entitled, namely: DEFENDANT HAD A  
11 FINANCIAL INTEREST IN AND RECEIVED FINANCIAL INCENTIVES TO  
12 PRESCRIBE COMPOUND CREAMS TO HIS WORKERS' COMPENSATION PATIENTS.

9  
10 COUNT 9: On or about and between May 17, 2013 and September 18,  
11 2014, in violation of Section 550(b)(3) of the Penal Code  
12 (INSURANCE FRAUD), a FELONY, MANNIE JOEL, with the intent to  
13 defraud, did unlawfully conceal and knowingly fail to disclose,  
14 and did knowingly assist with another person to conceal and fail  
15 to disclose the occurrence of an event and a fact that affected  
16 the initial and continued material right and entitlement of  
17 TRAVELERS to an insurance benefit and payment, and to the amount  
18 of a benefit and payment to which TRAVELERS was entitled,  
19 namely: DEFENDANT HAD A FINANCIAL INTEREST IN AND RECEIVED  
20 FINANCIAL INCENTIVES TO PRESCRIBE COMPOUND CREAMS AND TO ORDER  
21 URINE TOXICOLOGY TESTING TO HIS WORKERS' COMPENSATION PATIENTS.

18  
19 COUNT 10: On or about and between May 20, 2013 and September  
20 18, 2014, in violation of Section 550(b)(3) of the Penal Code  
21 (INSURANCE FRAUD), a FELONY, MANNIE JOEL, with the intent to  
22 defraud, did unlawfully conceal and knowingly fail to disclose,  
23 and did knowingly assist with another person to conceal and fail  
24 to disclose the occurrence of an event and a fact that affected  
25 the initial and continued material right and entitlement of YORK  
26 RISK SERVICES GROUP to an insurance benefit and payment, and to  
27 the amount of a benefit and payment to which YORK RISK SERVICES  
28 GROUP was entitled, namely: DEFENDANT HAD A FINANCIAL INTEREST  
IN AND RECEIVED FINANCIAL INCENTIVES TO PRESCRIBE COMPOUND  
CREAMS AND TO ORDER URINE TOXICOLOGY TESTS TO HIS WORKERS'  
COMPENSATION PATIENTS.

27 /  
28 /  
/  
/

1 COUNT 11: On or about and between April 23, 2013 and June 13,  
2 2013, in violation of Section 550(b)(3) of the Penal Code  
3 (INSURANCE FRAUD), a FELONY, MANNIE JOEL, with the intent to  
4 defraud, did unlawfully conceal and knowingly fail to disclose,  
5 and did knowingly assist with another person to conceal and fail  
6 to disclose the occurrence of an event and a fact that affected  
7 the initial and continued material right and entitlement of  
8 ZURICH to an insurance benefit and payment, and to the amount of  
9 a benefit and payment to which ZURICH was entitled, namely:  
10 DEFENDANT HAD A FINANCIAL INTEREST IN AND RECEIVED FINANCIAL  
11 INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO HIS WORKERS'  
12 COMPENSATION PATIENTS.

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

11 Dated 04-03-2017 at Orange County, California.  
12 KS/AC 17F00359

13  
14 TONY RACKAUCKAS, DISTRICT ATTORNEY

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

17 RESTITUTION CLAIMED

18  
19 [ ] None  
20 [ ] \$ \_\_\_\_\_  
21 [ X ] To be determined

22 BAIL RECOMMENDATION:

23 MANNIE JOEL - \$ 30,000.00

24 NOTICES:

25 The People request that defendant and counsel disclose, within  
26 15 days, all of the materials and information described in Penal  
27 Code section 1054.3, and continue to provide any later-acquired  
28 materials and information subject to disclosure, and without  
further request or order.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.



**State of California**  
**Kevin Shelley**  
**Secretary of State**  
**STATEMENT OF INFORMATION**  
**(Domestic Stock Corporation)**

S

05-239787

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

MAY 16 2005

This Space For Filing Use Only

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

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

1. **CORPORATE NAME** (Please do not alter if name is preprinted.)

C1107564  
 MANNIE JOEL, M.D., INC.  
 PO BOX 11087  
 PLEASANTON CA 94588

**DUE DATE: 04-30-05**

**CALIFORNIA CORPORATE DISCLOSURE ACT** (Corporations Code section 1502.1)

A publicly traded corporation must file with the Secretary of State a Corporate Disclosure Statement (Form SI-PT) annually, within 150 days after the end of its fiscal year. Please see reverse for additional information regarding publicly traded corporations.

**NO CHANGE STATEMENT**

2.  If there has been no change in any of the information contained in the last Statement of Information filed with the Secretary of State, check the box and proceed to Item 15.  
 If there have been any changes to the information contained in the last Statement of Information filed with the Secretary of State, or no statement has been previously filed, this form must be completed in its entirety.

**COMPLETE ADDRESSES FOR THE FOLLOWING** (Do not abbreviate the name of the city. Items 3 and 4 cannot be P.O. Boxes.)

3. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY AND STATE ZIP CODE  
 25 Tehan Canyon Road Pleasanton CA 94588

4. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY CITY STATE ZIP CODE  
 25 Tehan Canyon Road Pleasanton CA 94588

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

5. CHIEF EXECUTIVE OFFICER/ ADDRESS CITY AND STATE ZIP CODE  
 Mannie Joel 25 Tehan Canyon Road Pleasanton CA 94588

6. SECRETARY/ ADDRESS CITY AND STATE ZIP CODE  
 Mannie Joel 25 Tehan Canyon Road Pleasanton CA 94588

7. CHIEF FINANCIAL OFFICER/ ADDRESS CITY AND STATE ZIP CODE  
 Mannie Joel 25 Tehan Canyon Road Pleasanton CA 94588

**NAMES AND COMPLETE ADDRESSES OF ALL DIRECTORS, INCLUDING DIRECTORS WHO ARE ALSO OFFICERS** (The corporation must have at least one director. Attach additional pages, if necessary.)

8. NAME ADDRESS CITY AND STATE ZIP CODE  
 Mannie Joel 25 Tehan Canyon Road Pleasanton, CA 94588

9. NAME ADDRESS CITY AND STATE ZIP CODE

10. NAME ADDRESS CITY AND STATE ZIP CODE

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

**AGENT FOR SERVICE OF PROCESS** (If the agent is an individual, the agent must reside in California and Item 13 must be completed with a California address. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 13 must be left blank.)

12. NAME OF AGENT FOR SERVICE OF PROCESS  
 Mannie Joel

13. ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE  
 25 Tehan Canyon Road Pleasanton CA 94588

**TYPE OF BUSINESS**

14. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION  
 Medical Services

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

Mannie Joel  
 TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM

Medical Director 3/27/05  
 TITLE DATE