

## INDEX

Matnick Orthopedic Medical Group & Daniel Alexander Capen, M.D.

<b>Exhibit #</b>	<b>Document</b>	<b>File Date</b>
1	The People of the State of CA v Daniel Alexander Capen, M.D. (Case no. 16CF1352)	5/20/2016
2	CA Secretary of State: Statement of Information (Corporation no. C3108865)	3/26/2010

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

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

05/20/2016  
11:19 AM

ALAN CARLSON, Clerk of the Court  
**16CF1352**

6 THE PEOPLE OF THE STATE OF CALIFORNIA, ) FELONY COMPLAINT  
7 ) REFILED 14ZF0334  
8 Plaintiff, )  
9 )  
10 vs. ) No.  
11 EVETTE ANN CHARBONNET 02/20/78 ) OCDA WC11120004  
D6979423 ) OCDA WC14070007  
12 CURTIS WILLIAM HAGUE 06/06/72 )  
D6415633 )  
13 DANIEL ALEXANDER CAPEN MD 10/07/49 )  
14 N5411616 )  
15 )  
16 Defendant(s)

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

19 COUNT 1: On or about October 01, 2009, in violation of Section  
20 550(a)(6) of the Penal Code (CONSPIRACY TO COMMIT MEDICAL  
21 INSURANCE FRAUD), a FELONY, EVETTE ANN CHARBONNET, CURTIS  
22 WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD did unlawfully  
23 conspire with KAREEM AHMED, BRUCE CURNICK, MIKE SHAH, with the  
24 intent to defraud, to make a false and fraudulent claim to  
25 WORKERS COMPENSATION CARRIERS for payment of a health care  
26 benefit in an amount exceeding nine hundred fifty dollars  
(\$950). It is further alleged that pursuant to and for the  
purpose of carrying out the objects and purposes of the  
conspiracy, one and more of the conspirators committed the  
following overt acts:

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OVERT ACT 1

Kareem Ahmed employed Defendant Evette Charbonnet as the Marketing Manager for his company Landmark Medical Management LLC from October 1, 2009 to June 17, 2014.

OVERT ACT 2

Sometime in 2009, Kareem Ahmed, Evette Charbonnet, Bruce Curnick and Mike Shah (a Pharmacist) met and formulated three compound transdermal cream formulas based on the profitability of the ingredients, in the County of Orange.

OVERT ACT 3

Defendant Evette Charbonnet led a team of marketers to identify and recruit physicians who treated workers compensation patients in order to dispense and prescribe these compounded transdermal creams.

OVERT ACT 4

Under the guise of purchasing the medical providers' account receivables, Kareem Ahmed and Defendant Charbonnet gave financial incentives to the physicians to dispense and prescribe compounded transdermal creams manufactured by Curt's Compounding Pharmacy in Orange County, California, to their workers' compensation patients.

OVERT ACT 5

Ahmed and Charbonnet managed every aspect of the kickback program and used the following companies to pay the medical providers: Healthcare Finance Management, LLC, Med-Rx LLC, and Physicians Funding Solutions LLC.

OVERT ACT 6

Ahmed would not purchase account receivables from the medical providers unless they were for prescriptions relating to transdermal compound creams that were manufactured by one of pharmacies he contracted with.

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OVERT ACT 7

Curtis Hague, a pharmacist and the owner of Curt's Compounding Pharmacy, in Orange County, California, agreed to manufacture Kareem Ahmed's formulas for distribution to workers' compensation patients.

OVERT ACT 8

At Ahmed's direction, Hague manufactured thousands of the "3-day supply" of the transdermal compound creams and distributed them to medical providers who were working with Ahmed.

OVERT ACT 9

Ahmed and Charbonnet would only pay the medical providers for distribution of the transdermal compound creams manufactured by Curt's Compounding Pharmacy and Healthcare Pharmacy, in Orange County, California, if the medical provider also prescribed a larger size of the transdermal creams to each patient which would then be directly shipped from these pharmacies to each patient.

OVERT ACT 10

At Ahmed and Charbonnet's direction, Hague provided the 3-day supply of the transdermal creams to medical providers who entered into a contract with Healthcare Finance Management, LLC, Med-Rx LCC, and Physicians Funding Solutions LLC so that the medical staff could hand the creams to the workers compensation patients and justify the provider's ability to bill insurance carriers and generate accounts receivables.

OVERT ACT 11

Between June 17, 2010 and December 31, 2012, Ahmed and Charbonnet paid medical providers over 25 million dollars in kickbacks to dispense transdermal compound creams which were manufactured by pharmacists they had contracts with.

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OVERT ACT 12

Ahmed, through his company named Physician Funding Solutions LLC, agreed to pay Daniel Capen, M.D. \$90 for each compound transdermal cream distributed to a workers compensation patient.

OVERT ACT 13

Between 4/1/10 and 12/28/12, Ahmed paid Dr. Daniel Capen, M.D. \$2,608,727.50 in kickbacks to distribute and prescribe transdermal compound creams to workers compensation patients he treated and at least one payment was issued by Healthcare Finance Management to Daniel Capen on 12/28/12 in the amount of \$10,545.

COUNT 2: On or about and between June 17, 2011 and December 31, 2012, in violation of Section 650 of the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY, DANIEL ALEXANDER CAPEN MD, a person licensed under the Healing Arts Division of this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate, refund, commission, preference, patronage dividend, discount, and other consideration as compensation and inducement for referring patients, clients, and customers to CURT'S COMPOUNDING PHARMACY IN FOUNTAIN VALLEY, CALIFORNIA.

COUNT 3: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD, with the intent to defraud, did knowingly and unlawfully prepare, make, and subscribe a material writing, with the intent to present and use it, and to allow it to be presented to AMERICAN CLAIMS MANAGEMENT INS., in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

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1 COUNT 4: On or about and between June 17, 2010 and December 31,  
2 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to AIG/  
8 CHARTIS, in support of a false and fraudulent claim, and did aid  
9 and abet, and solicit another to do the same.

10 COUNT 5: On or about and between June 17, 2010 and December 31,  
11 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to CNA  
17 INS., in support of a false and fraudulent claim, and did aid  
18 and abet, and solicit another to do the same.

19 COUNT 6: On or about and between June 17, 2010 and December 31,  
20 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to  
26 TRAVELERS INS., in support of a false and fraudulent claim, and  
27 did aid and abet, and solicit another to do the same.

28 COUNT 7: On or about and between June 17, 2010 and December 31,  
2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
FIREMAN'S FUND INS., in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

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1 COUNT 8: On or about and between June 17, 2010 and December 31,  
2 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to ACIG,  
8 in support of a false and fraudulent claim, and did aid and  
9 abet, and solicit another to do the same.

10 COUNT 9: On or about and between June 17, 2010 and December 31,  
11 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to  
17 BERKSHIRE HATHAWAY HOMESTATE COMPANIES, in support of a false  
18 and fraudulent claim, and did aid and abet, and solicit another  
19 to do the same.

20 COUNT 10: On or about and between June 17, 2010 and December  
21 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
22 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
23 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
24 with the intent to defraud, did knowingly and unlawfully  
25 prepare, make, and subscribe a material writing, with the intent  
26 to present and use it, and to allow it to be presented to  
27 FARMERS INS., in support of a false and fraudulent claim, and  
28 did aid and abet, and solicit another to do the same.

COUNT 11: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
LIBERTY MUTUAL INS., in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

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1 COUNT 12: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to ZENITH  
8 INS., in support of a false and fraudulent claim, and did aid  
9 and abet, and solicit another to do the same.

10 COUNT 13: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to ZURICH  
17 INS., in support of a false and fraudulent claim, and did aid  
18 and abet, and solicit another to do the same.

19 COUNT 14: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to YORK,  
26 in support of a false and fraudulent claim, and did aid and  
27 abet, and solicit another to do the same.

28 COUNT 15: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
TRISTAR, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

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1 COUNT 16: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to STATE  
8 FARM INS., in support of a false and fraudulent claim, and did  
9 aid and abet, and solicit another to do the same.

10 COUNT 17: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to SENTRY  
17 INS., in support of a false and fraudulent claim, and did aid  
18 and abet, and solicit another to do the same.

19 COUNT 18: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to STATE  
26 COMPENSATION INSURANCE FUND, in support of a false and  
27 fraudulent claim, and did aid and abet, and solicit another to  
28 do the same.

COUNT 19: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
PACIFIC COMPENSATION, in support of a false and fraudulent  
claim, and did aid and abet, and solicit another to do the same.

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1 COUNT 20: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to MSIG,  
8 in support of a false and fraudulent claim, and did aid and  
9 abet, and solicit another to do the same.

10 COUNT 21: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to MARKEL  
17 FIRSTCOMP, in support of a false and fraudulent claim, and did  
18 aid and abet, and solicit another to do the same.

19 COUNT 22: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to ALASKA  
26 NATIONAL INS. CO., in support of a false and fraudulent claim,  
27 and did aid and abet, and solicit another to do the same.

28 COUNT 23: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to COMP  
WEST INS., in support of a false and fraudulent claim, and did  
aid and abet, and solicit another to do the same.

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1 COUNT 24: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to  
8 EMPLOYERS INS., in support of a false and fraudulent claim, and  
9 did aid and abet, and solicit another to do the same.

10 COUNT 25: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to  
17 GALLAGHER BASSETT, in support of a false and fraudulent claim,  
18 and did aid and abet, and solicit another to do the same.

19 COUNT 26: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to  
26 SEDGWICK INS., in support of a false and fraudulent claim, and  
27 did aid and abet, and solicit another to do the same.

28 COUNT 27: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to STATE  
FARM, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

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1 COUNT 28: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to SRS,  
8 in support of a false and fraudulent claim, and did aid and  
9 abet, and solicit another to do the same.

10 COUNT 29: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to CHURCH  
17 MUTUAL, in support of a false and fraudulent claim, and did aid  
18 and abet, and solicit another to do the same.

19 COUNT 30: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to  
26 TRISTAR, in support of a false and fraudulent claim, and did aid  
27 and abet, and solicit another to do the same.

28 COUNT 31: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to ESIS,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

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1 COUNT 32: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to  
8 ADMINISURE, in support of a false and fraudulent claim, and did  
9 aid and abet, and solicit another to do the same.

10 COUNT 33: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to  
17 PATRIOT, in support of a false and fraudulent claim, and did aid  
18 and abet, and solicit another to do the same.

19 COUNT 34: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to FRANK  
26 GATES, in support of a false and fraudulent claim, and did aid  
27 and abet, and solicit another to do the same.

28 COUNT 35: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to ELITE,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

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1 COUNT 36: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to BBSI,  
8 in support of a false and fraudulent claim, and did aid and  
9 abet, and solicit another to do the same.

10 COUNT 37: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to CHUBB  
17 INS., in support of a false and fraudulent claim, and did aid  
18 and abet, and solicit another to do the same.

19 COUNT 38: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to CRUM &  
26 FORSTER, in support of a false and fraudulent claim, and did aid  
27 and abet, and solicit another to do the same.

28 COUNT 39: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
MATRIX, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

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1 COUNT 40: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to  
8 SEABRIGHT INS., in support of a false and fraudulent claim, and  
9 did aid and abet, and solicit another to do the same.

10 COUNT 41: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to  
17 AVIZENT, in support of a false and fraudulent claim, and did aid  
18 and abet, and solicit another to do the same.

19 COUNT 42: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to YORK,  
26 in support of a false and fraudulent claim, and did aid and  
27 abet, and solicit another to do the same.

28 COUNT 43: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
BROADSPIRE, in support of a false and fraudulent claim, and did  
aid and abet, and solicit another to do the same.

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1 COUNT 44: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to SCRMA,  
8 in support of a false and fraudulent claim, and did aid and  
9 abet, and solicit another to do the same.

10 COUNT 45: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to AARLA,  
17 in support of a false and fraudulent claim, and did aid and  
18 abet, and solicit another to do the same.

19 COUNT 46: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to  
26 SOUTHLAND CLAIMS, in support of a false and fraudulent claim,  
27 and did aid and abet, and solicit another to do the same.

28 COUNT 47: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to ONE  
BEACON, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

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1 COUNT 48: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to KEENAN  
& ASSOCIATES, in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

8 COUNT 49: On or about and between June 17, 2010 and December  
9 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
10 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
11 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
12 with the intent to defraud, did knowingly and unlawfully  
13 prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to LOMA  
LINDA UNIVERSITY, in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

14 COUNT 50: On or about and between June 17, 2010 and December  
15 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
16 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
17 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
18 with the intent to defraud, did knowingly and unlawfully  
19 prepare, make, and subscribe a material writing, with the intent  
20 to present and use it, and to allow it to be presented to BUNCH  
& ASSOCIATES, in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

21 COUNT 51: On or about and between June 17, 2010 and December  
22 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
23 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
24 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
25 with the intent to defraud, did knowingly and unlawfully  
26 prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
SAFECO, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

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1 COUNT 52: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to  
8 ATHENS, in support of a false and fraudulent claim, and did aid  
9 and abet, and solicit another to do the same.

10 COUNT 53: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to GUIDE  
17 ONE, in support of a false and fraudulent claim, and did aid and  
18 abet, and solicit another to do the same.

19 COUNT 54: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to  
26 MIDWEST, in support of a false and fraudulent claim, and did aid  
27 and abet, and solicit another to do the same.

28 COUNT 55: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
MEADOWBROOK, in support of a false and fraudulent claim, and did  
aid and abet, and solicit another to do the same.

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1 COUNT 56: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to  
8 CAMBRIDGE, in support of a false and fraudulent claim, and did  
9 aid and abet, and solicit another to do the same.

10 COUNT 57: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to REM,  
17 in support of a false and fraudulent claim, and did aid and  
18 abet, and solicit another to do the same.

19 COUNT 58: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to  
26 PREFERRED EMPLOYERS, in support of a false and fraudulent claim,  
27 and did aid and abet, and solicit another to do the same.

28 COUNT 59: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to ICW,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

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1 COUNT 60: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to GOLDEN  
8 EAGLE, in support of a false and fraudulent claim, and did aid  
9 and abet, and solicit another to do the same.

10 COUNT 61: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to  
17 INTERCARE, in support of a false and fraudulent claim, and did  
18 aid and abet, and solicit another to do the same.

19 COUNT 62: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to TOWER,  
26 in support of a false and fraudulent claim, and did aid and  
27 abet, and solicit another to do the same.

28 COUNT 63: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to CCMSI,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

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1 COUNT 64: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to  
LUMBERMEN'S NATIONAL INTERSTATE, in support of a false and  
fraudulent claim, and did aid and abet, and solicit another to  
do the same.

8 COUNT 65: On or about and between June 17, 2010 and December  
9 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
10 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
11 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
12 with the intent to defraud, did knowingly and unlawfully  
13 prepare, make, and subscribe a material writing, with the intent  
14 to present and use it, and to allow it to be presented to  
KAISER, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

15 COUNT 66: On or about and between June 17, 2010 and December  
16 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
17 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
18 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
19 with the intent to defraud, did knowingly and unlawfully  
20 prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to  
HANOVER, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

21 COUNT 67: On or about and between June 17, 2010 and December  
22 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
23 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
24 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
25 with the intent to defraud, did knowingly and unlawfully  
26 prepare, make, and subscribe a material writing, with the intent  
27 to present and use it, and to allow it to be presented to CITY  
OF LOS ANGELES, in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

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1 COUNT 68: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to VONS,  
8 in support of a false and fraudulent claim, and did aid and  
9 abet, and solicit another to do the same.

10 COUNT 69: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to  
17 SOUTHERN CALIFORNIA GAS COMPANY, in support of a false and  
18 fraudulent claim, and did aid and abet, and solicit another to  
19 do the same.

20 COUNT 70: On or about and between June 17, 2010 and December  
21 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
22 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
23 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
24 with the intent to defraud, did knowingly and unlawfully  
25 prepare, make, and subscribe a material writing, with the intent  
26 to present and use it, and to allow it to be presented to  
27 DISNEY, in support of a false and fraudulent claim, and did aid  
28 and abet, and solicit another to do the same.

COUNT 71: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
with the intent to defraud, did knowingly and unlawfully  
prepare, make, and subscribe a material writing, with the intent  
to present and use it, and to allow it to be presented to CITY  
OF SANTA ANA, in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

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1 COUNT 72: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
4 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
5 with the intent to defraud, did knowingly and unlawfully  
6 prepare, make, and subscribe a material writing, with the intent  
7 to present and use it, and to allow it to be presented to CITY  
8 OF LONG BEACH, in support of a false and fraudulent claim, and  
9 did aid and abet, and solicit another to do the same.

10 COUNT 73: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
13 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
14 with the intent to defraud, did knowingly and unlawfully  
15 prepare, make, and subscribe a material writing, with the intent  
16 to present and use it, and to allow it to be presented to CITY  
17 OF SAN BERNARDINO, in support of a false and fraudulent claim,  
18 and did aid and abet, and solicit another to do the same.

19 COUNT 74: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, EVETTE ANN  
22 CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD,  
23 with the intent to defraud, did knowingly and unlawfully  
24 prepare, make, and subscribe a material writing, with the intent  
25 to present and use it, and to allow it to be presented to COUNTY  
26 OF SAN BERNARDINO, in support of a false and fraudulent claim,  
27 and did aid and abet, and solicit another to do the same.

28 COUNT 75: On or about and between June 17, 2011 and December  
31, 2012, in violation of Section 549 of the Penal Code (FALSE  
AND FRAUDULENT CLAIM), a FELONY, DANIEL ALEXANDER CAPEN MD did  
unlawfully solicit, accept, and refer business to and from MED-  
RX LLC, with the knowledge that, and with reckless disregard for  
whether MED-RX LLC intended to violate Penal Code section 550  
and Insurance Code section 1871.4.

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1 COUNT 76: On or about and between January 01, 2012 and December  
2 31, 2012, in violation of Section 549 of the Penal Code (FALSE  
3 AND FRAUDULENT CLAIM), a FELONY, DANIEL ALEXANDER CAPEN MD did  
4 unlawfully solicit, accept, and refer business to and from  
5 HEALTHCARE FINANCE MANAGEMENT, with the knowledge that, and with  
6 reckless disregard for whether HEALTHCARE FINANCE MANAGEMENT  
intended to violate Penal Code section 550 and Insurance Code  
section 1871.4.

7 COUNT 77: On or about and between June 17, 2011 and December  
8 31, 2012, in violation of Section 549 of the Penal Code (FALSE  
9 AND FRAUDULENT CLAIM), a FELONY, DANIEL ALEXANDER CAPEN MD did  
10 unlawfully solicit, accept, and refer business to and from  
11 PHYSICIANS FUNDING SOLUTIONS, with the knowledge that, and with  
12 reckless disregard for whether PHYSICIANS FUNDING SOLUTIONS  
intended to violate Penal Code section 550 and Insurance Code  
section 1871.4.

13 COUNT 78: On or about and between June 17, 2011 and December  
14 31, 2012, in violation of Section 549 of the Penal Code (FALSE  
15 AND FRAUDULENT CLAIM), a FELONY, CURTIS WILLIAM HAGUE did  
16 unlawfully solicit, accept, and refer business to and from  
17 PHARMAFINANCE, with the knowledge that, and with reckless  
disregard for whether PHARMAFINANCE intended to violate Penal  
Code section 550 and Insurance Code section 1871.4.

18 OTHER ALLEGATION(S)

19 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,  
20 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30,  
21 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46,  
22 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62,  
23 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77 and  
24 78, it is further alleged pursuant to Penal Code section 803(b)  
(STATUTE OF LIMITATIONS TOLLED), that a previous prosecution of  
25 defendants EVETTE ANN CHARBONNET, CURTIS WILLIAM HAGUE and  
26 DANIEL ALEXANDER CAPEN MD for the same conduct commenced within  
27 the meaning of Section 804(a), namely, an indictment or  
information was filed, and was pending in SUPERIOR COURT, County  
of ORANGE, State of California, from JUNE 18, 2014 to JUNE 3,  
2016.

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ENHANCEMENT(S)

It is further alleged pursuant to Penal Code section 186.11(a) (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as to counts 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73 and 74, defendants EVETTE ANN CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD engaged in a pattern of related fraudulent felony conduct involving the taking of more than five hundred thousand dollars (\$500,000).

As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77 and 78, it is further alleged pursuant to Penal Code section 12022.6 (a)(4) (PROPERTY DAMAGE OVER \$3,200,000), that EVETTE ANN CHARBONNET, CURTIS WILLIAM HAGUE and DANIEL ALEXANDER CAPEN MD intentionally took, damaged, and destroyed property valued in excess of three million two hundred thousand dollars (\$3,200,000) during the commission and attempted commission of the above offense.

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

Dated 05-20-2016 at Orange County, California.  
KS/AC 16F01361

TONY RACKAUCKAS, DISTRICT ATTORNEY

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

RESTITUTION CLAIMED

- None
- \$ \_\_\_\_\_
- To be determined

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NOTICES:

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

1 Errors detected, cannot file this statement



# State of California

## Secretary of State

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

MAR 26 2010

### STATEMENT OF INFORMATION (Domestic Stock Corporation)

Fees \$25.00.

**IMPORTANT** - Read instructions before completing this SI-200-NC form.

Copies of e-filed statements are not provided-at-the-time of filing. Therefore, you may wish to print the completed pages for your records prior to submission. Copies of filed documents may be requested using our Business Entities Records Order form.

#### 1. CORPORATION NUMBER, NAME AND ADDRESS OF RECORD

**C3108865**  
**MATNICK ORTHOPEDIC MEDICAL GROUP**  
**LINDA MARTIN**  
**5600 WILSHIRE BLVD #540**  
**LOS ANGELES, CA 90036**

Cannot file a No-Change - without first filing a complete statement.

2.  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**

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 has been previously filed, this form must be completed in its entirety.

#### 3. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE (DO NOT USE PO BOX)

ADDRESS

5600 WILSHIRE BLVD SUITE 540

CITY

LOS ANGELES

STATE

CA

ZIP CODE

90036

COUNTRY

UNITED STATES



#### 4. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY (DO NOT USE PO BOX)

ADDRESS

6200 WILSHIR BLVD

SUITE 910

CITY

LOS ANGELES

STATE

CA

ZIP CODE

90048

#### 5. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 3

IN CARE OF/ATTENTION:

4/3

10-667739

310 8865

LINDA MARTIN  
 ADDRESS  
 5600 WILSHIR BLVD # 540

CITY	STATE	ZIP CODE	COUNTRY
LOS ANGELES	CA	90036	UNITED STATES

LIST THE NAMES AND COMPLETE ADDRESSES OF THE OFFICERS (The corporation must have these three officers.)

**6. CHIEF EXECUTIVE OFFICER**

FIRST	MIDDLE	LAST
DANIEL	A.	CAPEN

ADDRESS  
 3416 THE STRAND

CITY	STATE	ZIP CODE	COUNTRY
MANHATTAN BEACH	CA	90266	UNITED STATES

**7. SECRETARY**

FIRST	MIDDLE	LAST
NICHOLAS		CAPEN

ADDRESS  
 3416 THE STRAND

CITY	STATE	ZIP CODE	COUNTRY
MANHATTAN BEACH	CA	90266	UNITED STATES

**8. CHIEF FINANCIAL OFFICER**

FIRST	MIDDLE	LAST
MATTHEW		CAPEN

ADDRESS  
 3416 THE STRAND

CITY	STATE	ZIP CODE	COUNTRY
MANHATTAN BEACH	CA	90266	UNITED STATES

LIST THE NAMES AND COMPLETE ADDRESSES OF ALL DIRECTORS, INCLUDING DIRECTORS WHO ARE ALSO OFFICERS (The corporation must have at least one director.)

**9.**

FIRST	MIDDLE	LAST
DANIEL	A	CAPEN

ADDRESS  
 3416 THE STRAND

CITY	STATE	ZIP CODE	COUNTRY
MANHATTAN BEACH	CA	90266	UNITED STATES

**10.**

FIRST	MIDDLE	LAST

2/3

310 88 65

10-667739

ADDRESS

CITY	STATE	ZIP CODE	COUNTRY
			UNITED STATES

11.

FIRST	MIDDLE	LAST
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ADDRESS

CITY	STATE	ZIP CODE	COUNTRY
			UNITED STATES

Additional Directors

12. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY: 0

13. CHECK THE APPROPRIATE PROVISION BELOW AND NAME THE AGENT FOR SERVICE OF PROCESS

<input type="checkbox"/>	AN INDIVIDUAL RESIDING IN CALIFORNIA
	AGENT'S FIRST                      MIDDLE                      LAST
<input checked="" type="checkbox"/>	A CORPORATION WHICH HAS FILED A CERTIFICATE PURSUANT TO CALIFORNIA CORPORATIONS CODE SECTION 1505.
	NAME OF CORPORATE AGENT <a href="#">View List</a>
	DANIEL A. CAPEN, M.D.

14. STREET ADDRESS OF THE AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL

ADDRESS

3416 THE STRAND

CITY	STATE	ZIP CODE
MANHATTAN BEACH	CA	90266

15. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION

ORTHOPEDIC MEDICAL PRACTICE

16. ENTER THE NAME AND TITLE OF THE PERSON COMPLETING THIS STATEMENT. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUD ANY ATTACHMENTS, IS TRUE AND CORRECT.

DATE	TITLE	FIRST	MIDDLE	LAST
1/18/2010	ADMINISTRATOR	LINDA	J	MARTIN

1-18-10

*Linda J Martin*

3/3