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Millennium Medical Group of San Fernando, A Professional Corporation & Paul Turley

Exhibit #	Document
1	People of the State of California v. Paul Turley et al (Case no. BA425397)
2	CA Secretary of State: Statement of Information, 09/03/2010

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SECRET

The People of the State of California, Plaintiff, v. 1. **MUNIR UWAYDAH** 2. **PAUL TURLEY** 3. **MARIA TURLEY** 4. **MARISA SCHERMBECK-NELSON** 5. **PETER NELSON** 6. **DAVID JOHNSON, M.D.** 7. **LETICIA ALVAREZ LEMUS** 8. **JEFF STEVENS** 9. **WENDEE LUKE** 10. **KELLY PARK** 11. **RON CASE**	CASE NO. **BA425397** INDICTMENT

COUNT 1

The said MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME,** in violation of **Penal Code Section 182(a)(1),** a Felony, committed prior to the finding of this Indictment, and as follows:

A TRUE BILL

Foreperson of the Grand Jury

Presented by the Foreperson of the Grand Jury in the presence of the Grand Jury, in open Superior Court of the State of California, within and for the County of Los Angeles, and filed as a record in said Court this 25th day of February, 2015

SHERRI R. CARTER, Executive Officer/Clerk

By_____
Deputy

JACKIE LACEY, District Attorney

By Dayan V. Mathews
Deputy

On and between November 15, 2004 and February 20, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** did unlawfully conspire together and with another person and persons who identity is unknown to commit the crime of Insurance Fraud, in violation of Section 550(a)(6) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1) **On or about November 15, 2004, MUNIR UWAYDAH, an orthopedic surgeon, and PAUL TURLEY, incorporated Frontline Medical Associates.**

2) **Between November 15, 2004, and February 20, 2015, in order to obtain patients for Frontline Medical Associates, Firstline Health, Inc., and other related entities, MUNIR UWAYDAH and PAUL TURLEY paid "marketers" (aka "cappers") and attorneys for patient referrals.**

3) **Between February 1, 2006 and December 31, 2008, PAUL TURLEY AND MUNIR UWAYDAH made an agreement with Daniel Hitzke, a worker's compensation attorney, in which Hitzke would refer his clients to Frontline Medical Associates in exchange for a fee, or kickback. The agreement included bonuses for Hitzke for each client who would be a surgical candidate, with additional bonuses if the client had surgery.**

4) **Between February 1, 2006 and December 31, 2008, PAUL TURLEY, MUNIR UWAYDAH, and MARISA SCHERMBECK-NELSON paid cash to Attorney Daniel Hitzke in exchange for client referrals to Frontline Medical Associates.**

5) **From September 2006, to March 2010, JEFF STEVENS referred clients from attorney Dennis Fusi's office to Frontline Medical in exchange for money.**

6) **PAUL TURLEY and MARISSA SCHERMBECK-NELSON directed Esther Ros to maintain capping lists for Frontline, which documented which attorney's office the patient came from, and which were used to determine how much was to be paid for each patient referral.**

7) **Between November 1, 2004 and June 30, 2010, MUNIR UWAYDAH'S physician's assistant, PETER NELSON, performed surgical procedures on UWAYDAH'S patients while the patients were under general anesthesia and while MUNIR UWAYDAH was not present in the operating room.**

8) **Between November 1, 2004 and December 31, 2005, PETER NELSON performed surgical procedures on patients Hector Gonzalez, Ernesto Prado, and Rosalinda Munoz, while these patients were under general anesthesia.**

9) **Between May 1, 2006 and December 31, 2007, MUNIR UWAYDAH and PETER NELSON performed unnecessary surgery on Mario Dominguez, Mario Polomo, Joaquin Peirera, and Selvin De Leon because there was no objective evidence that the injuries which were cited as the justification for the surgeries were indicated in the patients' pre-operative MRI's.**

10) **Between September 11, 2007 and December 2010, under the direction of MUNIR UWAYDAH and PAUL TURLEY, Frontline Medical and Golden State Pharmaceuticals used Dr. Mills' name for prescribing medications and billing without his knowledge, consent or authorization.**

11) **On March 26, 2007, Golden State Pharmaceuticals was incorporated by MARISA SCHERMBECK-NELSON in order to serve Frontline patients exclusively.**

12) **On April 17, 2007, South Bay Surgical Center was incorporated by MUNIR UWAYDAH, MARISA SCHERMBECK-NELSON and Shelly Rosekelly, for the purpose of UWAYDAH performing surgeries on Frontline patients.**

13) **Between June 1, 2010 and December 31, 2011, LETICIA ALVAREZ LEMUS, Delmy Martinez and Jose Trujillo wrote DAVID JOHNSON'S name on prescriptions for medications.**

14) **Between January 1, 2009 and December 31, 2010, Kim Park and KELLY PARK prepared bills for Golden State Pharmaceuticals under the direction of MUNIR UWAYDAH.**

15) **From November 2004 to December 2010, DAVID JOHNSON over prescribed and over billed insurance companies for pharmaceuticals.**

16) **Between May 8, 2013 and December 31, 2014, DAVID JOHNSON billed insurance companies for office visits which he did not perform and for which he was not present.**

17) **Between January 1, 2007 and December 31, 2010, MUNIR UWAYDAH, PAUL TURLEY and MARIA TURLEY directed Susan Moreno to alter doctors' notes and reports in order to get surgery requests authorized by insurance companies. In return, she was paid monetary bonuses by MARISA SCHERMBECK-NELSON on behalf of Frontline Medical Associates.**

18) **Between January 1, 2009 and June 30, 2010, MARIA TURLEY directed Delmy Martinez to only include positive MRI's when seeking insurance company approval for surgeries.**

19) **Between January 1, 2009 and June 30, 2010, MARIA TURLEY, as Surgery Director, told Delmy Martinez to refer all patients with minor medical issues for surgery authorization and to refer them to South Bay Surgical.**

20) **In 2009, California MRI was incorporated, with JEFF STEVENS as the owner. The business was physically located in a trailer behind Frontline Medical Associates' San Fernando clinic in order to exclusively serve Frontline patients.**

21) **Between January 1, 2007 and December 31, 2007, while he was employed at Frontline, Dr. Mills was directed by PAUL TURLEY and MARIA TURLEY to send all patients with positive MRI's to UWAYDAH for surgery.**

22) **On February 23, 2010, Firstline Health, Inc. was incorporated and took over Frontline operations.**

23) **Between February 23, 2010 and December 31, 2011, PAUL TURLEY, WENDEE LUKE, and DAVID JOHNSON created U.S. Health and Orthopedics, as a DBA of Firstline Health, Inc.**

24) **On June 17, 2010, KELLY PARK and RONNIE CASE transported 921 prescription containers worth approximately $82,000 street value from their home. These prescription bottles were labeled with names of patients from Golden State Pharmaceuticals and Frontline Medical Associates.**

25) **On or between February 23, 2010, to December 31, 2014, WENDEE LUKE and Tatiana Torres Arnold caused money to be wired from Firstline bank accounts and/or related bank accounts to Estonia or Lebanon.**

26) **Between January 1, 2014 and January 15, 2014, PAUL TURLEY met with David Keller, a paralegal at a personal injury law firm, to discuss a possible business opportunity. During the meeting, PAUL TURLEY informed David Keller that MUNIR UWAYDAH and PAUL TURLEY were still involved in business together even though MUNIR UWAYDAH is in Lebanon, they were collecting on liens through U.S. Health and Orthopedics, and their involvement in the business was "silent."**

27) **Between January 1, 2014 and January 15, 2015, PAUL TURLEY travelled to Lebanon to meet with MUNIR UWAYDAH.**

28) **Between January 1, 2014 and January 15, 2015, PAUL TURLEY solicited David Keller to engage in a capping scheme.**

29) **Between August 21, 2008 and December 31, 2010, MUNIR UWAYDAH and KELLY PARK, and other co-conspirators planned to and did create a false arbitration agreement in the name of Jenniffer Milone.**

30) **Between August 1, 2008 and December 31, 2014, MUNIR UWAYDAH caused a fraudulent bill to be filed for payment for services rendered to patient Jenniffer Milone.**

31) **Between January 1, 2007 and June 30, 2010, KELLY PARK and RONNIE CASE, and other co-conspirators, planned to and did falsify documents in preparation for MUNIR UWAYDAH'S defense in a California Medical Board investigation.**

32) **Between January 1, 2009 and December 31, 2010, MUNIR UWAYDAH, PAUL TURLEY, KELLY PARK, RONNIE CASE, JEFF STEVENS and Tatiana Arnold attempted to become the majority shareholders in Ventura County Business Bank.**

33) **Between November 1, 2004 and February 20, 2015, Frontline Medical Associates, Firstline and South Bay Surgical billed for surgeries performed by PETER NELSON as if MUNIR UWAYDAH performed the surgeries.**

34) **Between March 26, 2007 and December 31, 2014, MUNIR UWAYDAH and PAUL TURLEY and other co-conspirators caused prescription medications to be mailed to patients without being in child proof protection containers.**

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Medication Billing Counts 2-21

COUNT 2

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to American Claims Management for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 3

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Berkshire Hathaway for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 4

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to CNA Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 5

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to City of Los Angeles for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 6

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Comp West Workers Compensation for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 7

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Employers Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 8

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Farmer's Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 9

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Fireman's Fund Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 10

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to ICW Group Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 11

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Liberty Mutual for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 12

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

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It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 13

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to State Compensation Insurance Fund for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 14

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Sentry Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

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COUNT 15

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to State Farm Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 16

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to The Hartford Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 17

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Travelers Company for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 18

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to York Risk Service Group for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 19

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Zenith Insurance for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 20

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Zurich North America for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 21

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(7),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly submit a claim to Sedgwick Insurance Company for a health care benefit which was not used by, or on behalf of, the claimant.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

Office Visits Counts 22-30

COUNT 22

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to American Claims Management for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 23

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to Berkshire Hathaway for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 24

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to City of Los Angeles for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 25

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to Fireman's Fund Insurance for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 26

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to Republic Indemnity for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 27

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly mak and cause to be made a false and fraudulent claim to Zenith Insurance for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 28

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to CNA Insurance for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 29

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to Zurich North America for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

COUNT 30

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and January 31, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to Liberty Mutual for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

Undercover Operation Counts 31-32

COUNT 31

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(5),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 13, 2013 and April 2, 2013, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim to Zenith Insurance.

* * * * *

COUNT 32

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(6),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 13, 2013 and April 2, 2013, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim to Zenith Insurance for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars ($950).

* * * * *

Surgical Billing Count 33

COUNT 33

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **INSURANCE FRAUD,** in violation of **Penal Code Section 550(a)(5),** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2011 and February 23, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim for patient Jaime Frias.

* * * * *

Aggravated Mayhem Counts 34-54

COUNT 34

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON and PETER NELSON** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 12, 2005, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON and PETER NELSON,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Jaime Frias.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 35

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON and PETER NELSON,** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 22, 2005, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON and PETER NELSON,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Jane Doe.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 36

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON and PETER NELSON** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between May 1, 2005 and May 31, 2005, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON and PETER NELSON,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Constance Hicks.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 37

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about February 20, 2008, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Arnulfo Martinez.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 38

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 2, 2009, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Kimberly Pope.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 39

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about December 9, 2009, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Rigoberto Campos.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 40

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about February 17, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Manuel Jimenez.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 41

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 17, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Jose Aguayo.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 42

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 26, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Jose Unda.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 43

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime o **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 26, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Leonel Zavala-Aguilar.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 44

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about April 23, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Ignacio Bobadilla.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 45

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about May 5, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Jesus Illescas.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 46

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about May 5, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Jose Barrera.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 47

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about May 20, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Kim Ingle.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 48

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about May 28, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Alfonso Lopez.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 49

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about June 11, 2010, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Angel Lopez.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 50

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 8, 2007 and December 31, 2008, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Mario Dominguez.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 51

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 20, 2007, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Selvin DeLeon.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 52

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about July 13, 2007, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Mario Paloma.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 53

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 8, 2007 and December 2008, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Juaquin Peirera.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 54

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM,** in violation of **Penal Code Section 205,** a Felony, committed prior to the finding of this Indictment, and as follows:

On or about August 21, 2008, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Jennifer Milone.**

> "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

Capping Counts 55-57

COUNT 55

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL,** in violation of **Labor Code Section 3215,** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 23, 2012 and February 23, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 56

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL,** in violation of **Labor Code Section 3215,** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 23, 2012 and February 23, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 57

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL,** in violation of **Labor Code Section 3215,** a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 23, 2012 and February 23, 2015, in the County of Los Angeles, the said **MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE,** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

It is further alleged, pursuant to Penal Code 186.11(a), that the offenses set forth in counts 1-57 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars ($500,000).

It is further alleged as to Counts 1-57 that in the commission of the above offenses the said defendants MUNIR UWAYDAH, PAUL TURLEY, MARIA TURLEY, MARISA SCHERMBECK-NELSON, PETER NELSON, DAVID JOHNSON, M.D., LETICIA ALVAREZ LEMUS, JEFF STEVENS, WENDEE LUKE, KELLY PARK and RON CASE, with the intent to do so, took, damaged and destroyed property of a value exceeding $3,200,000, within the meaning of Penal Code Section 12022.6(a)(4).

* * * * *

DEFENDANTS	BOOKING NO.	BAIL RECOM'D	BAIL
1. MUNIR UWAYDAH		$21,500,000.00	
2. PAUL TURLEY		$21,500,000.00	
3. MARIA TURLEY		$21,500,000.00	
4. MARISA SCHERMBECK-NELSON		$21,500,000.00	
5. PETER NELSON		$21,500,000.00	
6. DAVID JOHNSON, M.D.		$18,500,000.00	
7. LETICIA ALVAREZ LEMUS		$18,500,000.00	
8. JEFF STEVENS		$18,500,000.00	
9. WENDEE LUKE		$18,500,000.00	
10. KELLY PARK		$18,500,000.00	
11. RON CASE		$18,500,000.00	

State of California
Secretary of State

10-694974

FILED
in the office of the Secretary of State
of the State of California

SEP 03 2010

This Space For Filing Use Only

STATEMENT OF INFORMATION
(Domestic Stock and Agricultural Cooperative Corporations)

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

IMPORTANT — READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

S

1. **CORPORATE NAME** (Please do not alter if name is preprinted.)
Millennium Medical Group of San Fernando, A Professional Corporation # 2148493

DUE DATE:

COMPLETE ADDRESSES FOR THE FOLLOWING (Do not abbreviate the name of the city. Items 2 and 3 cannot be P.O. Boxes.)

	CITY	STATE	ZIP CODE
2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 12009 Wood Ranch Rd.	Granada Hills	Ca.	91344
3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY 12009 Wood Ranch Rd.	Granada Hills	CA	91344
4. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 2 12009 Wood Ranch Rd.	Granada Hills	Ca.	91344

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.)

	ADDRESS	CITY	STATE	ZIP CODE
5. CHIEF EXECUTIVE OFFICER/ Paul Turley	12009 Wood Ranch Rd.	Granada Hills	Ca.	91344
6. SECRETARY/ Paul Turley	12009 Wood Ranch Rd.	Granada Hills	Ca.	91344
7. CHIEF FINANCIAL OFFICER/ Paul Turley	12009 Wood Ranch Rd.	Granada Hills	Ca.	91344

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

	ADDRESS	CITY	STATE	ZIP CODE
8. NAME Paul Turley	12009 Wood Ranch Rd.	Granada Hills	Ca.	91344
9. NAME				
10. NAME				

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

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 street address (a P.O. Box address is not acceptable). If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 13 must be left blank.)

12. NAME OF AGENT FOR SERVICE OF PROCESS
Pro Business Coach, Inc. C2764608

	CITY	STATE	ZIP CODE
13. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, **IF AN INDIVIDUAL**		CA	

TYPE OF BUSINESS

14. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
Medical

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

DATE	TYPE/PRINT NAME OF PERSON COMPLETING FORM	TITLE	SIGNATURE
8/30/2010	Paul Turley	President	

APPROVED BY SECRETARY OF STATE