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S & B Surgery Center & Randy Rosen

Exhibit #	Document
1	People of the State of California v. Randy Rosen (Case no. 16CF1363)
2	CA Secretary of State: Statement of Information, 07/25/2008

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

05/20/2016
08:29 AM

ALAN CARLSON, Clerk of the Court
16CF1363

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) **FELONY COMPLAINT**
7) **REFILED 14ZF0334**
8 Plaintiff,)
9)
10 vs.) **No.**
11 RANDY SCOTT ROSEN 06/28/63) OCDA WC11120004
12 B7450425) OCDA WC14070007
13 Defendant(s))

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

16 COUNT 1: On or about and between March 31, 2010 and February
17 02, 2013, in violation of Section 550(a)(6) of the Penal Code
18 (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, RANDY
19 SCOTT ROSEN did unlawfully conspire with KAREEM AHMED AND OTHER
20 UNKNOWN INDIVIDUALS, with the intent to defraud, to make a false
21 and fraudulent claim to WORKERS COMPENSATION INSURANCE CARRIERS
22 for payment of a health care benefit in an amount exceeding nine
23 hundred fifty dollars (\$950). It is further alleged that
24 pursuant to and for the purpose of carrying out the objects and
25 purposes of the conspiracy, one and more of the conspirators
26 committed the following overt acts:

24 OVERT ACT 1

25 Randy Rosen, M.D. entered into an agreement with Kareem Ahmed
26 and his companies: Physicians' Funding Solutions, LLC, Med-Rx
27 and Healthcare Finance Management to distribute transdermal
28 compound creams which were manufactured by Curt's Compounding
Pharmacy in Orange County to workers compensation patients
treated by Dr. Rosen.

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OVERT ACT 2

Under the guise of selling accounts receivables to Physicians Funding Solutions, Med-Rx and Healthcare Finance Management, Randy Rosen received kickbacks to prescribe transdermal compound creams manufactured by Curt's Compounding Pharmacy in Orange County California.

OVERT ACT 3

On March 31, 2010, Physicians Funding Solutions, agreed to pay Randy Rosen \$77 (Seventy-Seven dollars) for each compound cream he distributed and prescribed to his workers compensation patients.

OVERT ACT 4

At Ahmed direction, Curt's Compounding Pharmacy provided the 3-day supply of the transdermal creams to Dr. Rosen who entered into a contract with Healthcare Finance Management, LLC, Med-Rx LCC, and Physicians Funding Solutions LLC so that he and his 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 5

Physicians Funding Solutions, Med-Rx and Healthcare Finance Management would only pay Randy Rosen for distribution of the transdermal compound creams manufactured by Curt's Compounding Pharmacy if Dr. Rosen also prescribed a larger size of the transdermal creams to each patient which would then be directly shipped from Curt's Compounding Pharmacy in Orange County to each workers compensation patient.

OVERT ACT 6

On January 1, 2012, Randy Rosen, M.D. entered into an agreement with Healthcare Finance Management, LLC, another one of Kareem Ahmed's companies, to distribute transdermal compound creams which were manufactured by Curt's Compounding Pharmacy in Orange County to workers compensation patients treated by Dr. Rosen.

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OVERT ACT 7

Healthcare Finance Management paid Randy Rosen \$90 (Ninety dollars) for each compound cream he distributed and prescribed to his workers compensation patients.

OVERT ACT 8

Between 5/20/10 and 12/31/12, Kareem Ahmed paid Randy Rosen \$636,900 for prescribing compound transdermal creams.

OVERT ACT 9

Healthcare Finance Management issued at least one payment to Randy Rosen, on 2/2/13 in the amount of \$1,440 on 2/2/13.

OVERT ACT 10

Dr. Rosen distributed thousands of transdermal compound creams manufactured by Curt's Compounding Pharmacy in Orange County to his workers compensation patients regardless of medical necessity.

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, RANDY SCOTT ROSEN, 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, RANDY SCOTT ROSEN, 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, 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to
7 AMERICAN CLAIMS MANAGEMENT, in support of a false and fraudulent
8 claim, and did aid and abet, and solicit another to do the same.

7 COUNT 5: On or about and between June 17, 2010 and December 31,
8 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
10 with the intent to defraud, did knowingly and unlawfully
11 prepare, make, and subscribe a material writing, with the intent
12 to present and use it, and to allow it to be presented to
13 BERKSHIRE HATHAWAY HOMESTATE COMPANIES, in support of a false
14 and fraudulent claim, and did aid and abet, and solicit another
15 to do the same.

13 COUNT 6: On or about and between June 17, 2010 and December 31,
14 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
16 with the intent to defraud, did knowingly and unlawfully
17 prepare, make, and subscribe a material writing, with the intent
18 to present and use it, and to allow it to be presented to
19 FARMERS INS., in support of a false and fraudulent claim, and
20 did aid and abet, and solicit another to do the same.

19 COUNT 7: 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, RANDY SCOTT ROSEN,
22 with the intent to defraud, did knowingly and unlawfully
23 prepare, make, and subscribe a material writing, with the intent
24 to present and use it, and to allow it to be presented to
25 LIBERTY MUTUAL INS., in support of a false and fraudulent claim,
26 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to ZENITH
INS., in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

7 COUNT 9: On or about and between June 17, 2010 and December 31,
8 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
10 with the intent to defraud, did knowingly and unlawfully
11 prepare, make, and subscribe a material writing, with the intent
12 to present and use it, and to allow it to be presented to AIG/
CHARTIS, in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

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

19 COUNT 11: 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, RANDY SCOTT ROSEN,
22 with the intent to defraud, did knowingly and unlawfully
23 prepare, make, and subscribe a material writing, with the intent
24 to present and use it, and to allow it to be presented to ZURICH
INS., in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

25 COUNT 12: On or about and between June 17, 2010 and December
26 31, 2012, in violation of Section 550(a)(5) of the Penal Code
27 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
28 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
COMPENSATION INSURANCE, in support of a false and fraudulent
claim, and did aid and abet, and solicit another to do the same.

1 COUNT 13: 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to SENTRY
INS., in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

7 COUNT 14: On or about and between June 17, 2010 and December
8 31, 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
10 with the intent to defraud, did knowingly and unlawfully
11 prepare, make, and subscribe a material writing, with the intent
12 to present and use it, and to allow it to be presented to
COMPWEST INS., in support of a false and fraudulent claim, and
did aid and abet, and solicit another to do the same.

13 COUNT 15: On or about and between June 17, 2010 and December
14 31, 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
16 with the intent to defraud, did knowingly and unlawfully
17 prepare, make, and subscribe a material writing, with the intent
18 to present and use it, and to allow it to be presented to MARKEL
FIRST COMP INS, in support of a false and fraudulent claim, and
did aid and abet, and solicit another to do the same.

19 COUNT 16: 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, RANDY SCOTT ROSEN,
22 with the intent to defraud, did knowingly and unlawfully
23 prepare, make, and subscribe a material writing, with the intent
24 to present and use it, and to allow it to be presented to
EMPLOYERS INS, in support of a false and fraudulent claim, and
did aid and abet, and solicit another to do the same.

25 COUNT 17: On or about and between June 17, 2010 and December
26 31, 2012, in violation of Section 550(a)(5) of the Penal Code
27 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
28 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 ALASKA
NATIONAL INS CO., in support of a false and fraudulent claim,
and did aid and abet, and solicit another to do the same.

1 COUNT 18: 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 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.

7 COUNT 19: On or about and between June 17, 2010 and December
8 31, 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
10 with the intent to defraud, did knowingly and unlawfully
11 prepare, make, and subscribe a material writing, with the intent
12 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.

13 COUNT 20: On or about and between June 17, 2010 and December
14 31, 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
16 with the intent to defraud, did knowingly and unlawfully
17 prepare, make, and subscribe a material writing, with the intent
18 to present and use it, and to allow it to be presented to
HARTFORD, in support of a false and fraudulent claim, and did
aid and abet, and solicit another to do the same.

19 COUNT 21: 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, RANDY SCOTT ROSEN,
22 with the intent to defraud, did knowingly and unlawfully
23 prepare, make, and subscribe a material writing, with the intent
24 to present and use it, and to allow it to be presented to
SEDGWICK, in support of a false and fraudulent claim, and did
aid and abet, and solicit another to do the same.

25 COUNT 22: On or about and between June 17, 2010 and December
26 31, 2012, in violation of Section 550(a)(5) of the Penal Code
27 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
28 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 WAUSAU
INS., in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

1 COUNT 23: 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to SCRMA,
in support of a false and fraudulent claim, and did aid and
abet, and solicit another to do the same.

7 COUNT 24: On or about and between June 17, 2010 and December
8 31, 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
10 with the intent to defraud, did knowingly and unlawfully
11 prepare, make, and subscribe a material writing, with the intent
12 to present and use it, and to allow it to be presented to
TRISTAR RISK MANAGEMENT, in support of a false and fraudulent
claim, and did aid and abet, and solicit another to do the same.

13 COUNT 25: On or about and between June 17, 2010 and December
14 31, 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
16 with the intent to defraud, did knowingly and unlawfully
17 prepare, make, and subscribe a material writing, with the intent
18 to present and use it, and to allow it to be presented to AIMS,
in support of a false and fraudulent claim, 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, RANDY SCOTT ROSEN,
22 with the intent to defraud, did knowingly and unlawfully
23 prepare, make, and subscribe a material writing, with the intent
24 to present and use it, and to allow it to be presented to CHUBB
INS., in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

25 COUNT 27: On or about and between June 17, 2010 and December
26 31, 2012, in violation of Section 550(a)(5) of the Penal Code
27 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
28 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
CORVEL, in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to FRANK
GATES, in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

7 COUNT 29: On or about and between June 17, 2010 and December
8 31, 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
10 with the intent to defraud, did knowingly and unlawfully
11 prepare, make, and subscribe a material writing, with the intent
12 to present and use it, and to allow it to be presented to ANTHEM
BLUE CROSS, in support of a false and fraudulent claim, and did
aid and abet, and solicit another to do the same.

13 COUNT 30: On or about and between June 17, 2010 and December
14 31, 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
16 with the intent to defraud, did knowingly and unlawfully
17 prepare, make, and subscribe a material writing, with the intent
18 to present and use it, and to allow it to be presented to CRUM &
FORSTER, in support of a false and fraudulent claim, and did aid
and abet, and solicit another to do the same.

19 COUNT 31: 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, RANDY SCOTT ROSEN,
22 with the intent to defraud, did knowingly and unlawfully
23 prepare, make, and subscribe a material writing, with the intent
24 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.

25 COUNT 32: On or about and between June 17, 2010 and December
26 31, 2012, in violation of Section 550(a)(5) of the Penal Code
27 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
28 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 COUNTY
OF LOS ANGELES, in support of a false and fraudulent claim, and
did aid and abet, and solicit another to do the same.

1 COUNT 33: 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to
MARRIOTT, in support of a false and fraudulent claim, and did
aid and abet, and solicit another to do the same.

7 COUNT 34: On or about and between June 17, 2010 and December
8 31, 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
10 with the intent to defraud, did knowingly and unlawfully
11 prepare, make, and subscribe a material writing, with the intent
12 to present and use it, and to allow it to be presented to VONS,
in support of a false and fraudulent claim, and did aid and
abet, and solicit another to do the same.

13 COUNT 35: On or about and between June 17, 2010 and December
14 31, 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
16 with the intent to defraud, did knowingly and unlawfully
17 prepare, make, and subscribe a material writing, with the intent
18 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.

19 COUNT 36: 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, RANDY SCOTT ROSEN,
22 with the intent to defraud, did knowingly and unlawfully
23 prepare, make, and subscribe a material writing, with the intent
24 to present and use it, and to allow it to be presented to
CANNON, 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 37: 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to
7 SOUTHERN CALIFORNIA GAS COMPANY, in support of a false and
8 fraudulent claim, and did aid and abet, and solicit another to
9 do the same.

10 COUNT 38: 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, RANDY SCOTT ROSEN,
13 with the intent to defraud, did knowingly and unlawfully
14 prepare, make, and subscribe a material writing, with the intent
15 to present and use it, and to allow it to be presented to EXXON
16 MOBILE, in support of a false and fraudulent claim, and did aid
17 and abet, and solicit another to do the same.

18 COUNT 39: On or about and between June 17, 2010 and December
19 31, 2012, in violation of Section 550(a)(5) of the Penal Code
20 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
21 with the intent to defraud, did knowingly and unlawfully
22 prepare, make, and subscribe a material writing, with the intent
23 to present and use it, and to allow it to be presented to
24 SAFEWAY, in support of a false and fraudulent claim, and did aid
25 and abet, and solicit another to do the same.

26 COUNT 40: On or about and between June 17, 2010 and December
27 31, 2012, in violation of Section 550(a)(5) of the Penal Code
28 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, RANDY SCOTT ROSEN,
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 BURBANK, 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 41: 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, RANDY SCOTT ROSEN,
4 with the intent to defraud, did knowingly and unlawfully
5 prepare, make, and subscribe a material writing, with the intent
6 to present and use it, and to allow it to be presented to SANTA
ANA UNITED SCHOOL, in support of a false and fraudulent claim,
and did aid and abet, and solicit another to do the same.

7 COUNT 42: 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, RANDY SCOTT ROSEN did
10 unlawfully solicit, accept, and refer business to and from
11 PHYSICIAN FUNDING SOLUTIONS, LLC., with the knowledge that, and
12 with reckless disregard for whether PHYSICIAN FUNDING SOLUTIONS,
LLC. intended to violate Penal Code section 550 and Insurance
Code section 1871.4.

13 COUNT 43: 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, RANDY SCOTT ROSEN did
16 unlawfully solicit, accept, and refer business to and from MED-
17 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.

18 COUNT 44: On or about and between December 01, 2012 and
19 December 31, 2012, in violation of Section 549 of the Penal Code
20 (FALSE AND FRAUDULENT CLAIM), a FELONY, RANDY SCOTT ROSEN did
21 unlawfully solicit, accept, and refer business to and from
22 HEALTHCARE FINANCE MANAGEMENT, with the knowledge that, and with
23 reckless disregard for whether HEALTHCARE FINANCE MANAGEMENT
intended to violate Penal Code section 550 and Insurance Code
section 1871.4.

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OTHER ALLEGATION(S)

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 and 44, it is further alleged pursuant to Penal Code section 803(b) (STATUTE OF LIMITATIONS TOLLED), that a previous prosecution of defendant RANDY SCOTT ROSEN for the same conduct commenced within 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.

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, 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 and 41, defendant RANDY SCOTT ROSEN 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) 2, 42, 43 and 44, it is further alleged pursuant to Penal Code section 12022.6(a)(2) (PROPERTY LOSS OVER \$200,000), that RANDY SCOTT ROSEN intentionally took, damaged, and destroyed property valued in excess of two hundred thousand dollars (\$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 16F01365

TONY RACKAUCKAS, DISTRICT ATTORNEY

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

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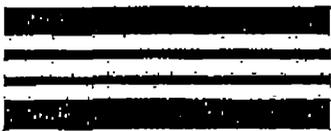
RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

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.

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State of California Secretary of State



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

JUL 25 2008

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

This Space For Filing Use Only

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

S & B SURGERY CENTER
C1982599

DUE DATE:

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

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE
120 S. Spalding Drive Beverly Hills, CA 90212
3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY
120 S. Spalding Drive Beverly Hills CA 90212
4. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 2

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.)

6. CHIEF EXECUTIVE OFFICER/
Theodore Goldstein, M.D. 120 S. Spalding Dr. Beverly Hills, CA 90212
6. SECRETARY/
James Sherman, M.D. 120 S. Spalding Dr. Beverly Hills, CA 90212
7. CHIEF FINANCIAL OFFICER/
James Sherman, M.D. 120 S. Spalding Dr. Beverly Hills, CA 90212

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

8. NAME ADDRESS CITY STATE ZIP CODE
Kendy Rosen, M.D. 120 S. Spalding Dr. Beverly Hills CA 90212
9. NAME ADDRESS CITY STATE ZIP CODE
Maureen Rosen 120 S. Spalding Dr. Beverly Hills CA 90212
10. NAME ADDRESS CITY STATE ZIP CODE
Philip Sobel, M.D. 120 S. Spalding Dr. Beverly Hills, CA 90212

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

AGENT FOR SERVICE OF PROCESS (If the agent is an individual, the agent must reside in California and Item 13 must be completed with a California 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 1606 and Item 13 must be left blank.)

12. NAME OF AGENT FOR SERVICE OF PROCESS
PARACORP INCORPORATED C 108 1536

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

TYPE OF BUSINESS

14. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
ambulatory care surgery center

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.

4/16/08 Dorothy Vinski General Counsel
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE