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Southwestern Orthopedic Medical Corporation & Daniel Capen

Exhibit #	Document
1	People v. Evette Ann Charbonnet, Daniel Alexander Capen, Curtis William (Case no. 16CF1352)
2	CA Secretary of State: Statement of Information, 06/19/2017

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

05/20/2016
11:19 AM

ALAN CARLSON, Clerk of the Court
16CF1352

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

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

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

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OVERT ACT 1

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

OVERT ACT 2

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

OVERT ACT 3

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

OVERT ACT 4

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

OVERT ACT 5

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

OVERT ACT 6

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

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OVERT ACT 7

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

OVERT ACT 8

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

OVERT ACT 9

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

OVERT ACT 10

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

OVERT ACT 11

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

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OVERT ACT 12

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

OVERT ACT 13

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

18 OTHER ALLEGATION(S)

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

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ENHANCEMENT(S)

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

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

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

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

TONY RACKAUCKAS, DISTRICT ATTORNEY

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

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

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NOTICES:

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



State of California Secretary of State

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Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FN35552

FILED

In the office of the Secretary of State
of the State of California

JUN-19 2017

1. CORPORATE NAME

SOUTHWESTERN ORTHOPEDIC MEDICAL CORPORATION

2. CALIFORNIA CORPORATE NUMBER

C1058106

This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to **Item 17**.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
1 HIDDEN HILLS CIRCLE, POMONA, CA 91766			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
1 HIDDEN HILLS CIRCLE, POMONA, CA 91766			
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7. CHIEF EXECUTIVE OFFICER/ JOHN LARSEN, MD	ADDRESS 1 HIDDEN HILLS CIRCLE, POMONA, CA 91766	CITY	STATE	ZIP CODE
8. SECRETARY JOHN LARSEN, MD	ADDRESS 1 HIDDEN HILLS CIRCLE, POMONA, CA 91766	CITY	STATE	ZIP CODE
9. CHIEF FINANCIAL OFFICER/ DANIEL CAPEN, MD	ADDRESS 1 HIDDEN HILLS CIRCLE, POMONA, CA 91766	CITY	STATE	ZIP CODE

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.)

10. NAME JOHN LARSEN, MD	ADDRESS 1 HIDDEN HILLS CIRCLE, POMONA, CA 91766	CITY	STATE	ZIP CODE
11. NAME DANIEL CAPEN, MD	ADDRESS 1 HIDDEN HILLS CIRCLE, POMONA, CA 91766	CITY	STATE	ZIP CODE
12. NAME	ADDRESS	CITY	STATE	ZIP CODE

13. 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 15 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 California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS RANDOLPH TAYLOR	CITY	STATE	ZIP CODE
15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL 1 HIDDEN HILLS CIRCLE, POMONA, CA 91766	CITY	STATE	ZIP CODE

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
MEDICAL GROUP

17. 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.

06/19/2017 RANDOLPH TAYLOR AGENT
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE