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Sunrise Diagnostic, Inc., A Medical Corporation & Amir Khan

Exhibit #	Document
1	The People of the State of California v. Amir Obaidullah Khan et al. (CT no. SCD255520)
2	CA Secretary of State: Statement of Information, 10/07/2015

FOR THE COUNTY OF SAN DIEGO

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

AMIR OBAIDULLAH KHAN,
dob 02/20/62;

FARHAT FATIMA KHAN,
dob 12/05/63;

ALEXANDER KIEV MARTINEZ,
dob 12/19/77;

Defendants

CT No. SCD255520
DA No. ADY480

INDICTMENT

Defendant

DNA Testing Requirements

KHAN, AMIR OBAIDULLAH

DNA sample required upon conviction

KHAN, FARHAT FATIMA

DNA sample required upon conviction

MARTINEZ, ALEXANDER KIEV

DNA sample required upon conviction

The Grand Jury of the County of San Diego, State of California, accuses the Defendant(s) of committing, in the County of San Diego, State of California, before the finding of this Indictment, the following crime(s):

CHARGES

COUNT 1 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (York Risk Services--ADL), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 2 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (York Risk Services--pain assessment), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 3 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Insurance Company of the West--ADL), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 4 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Insurance Company of the West--pain assessment), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 5 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Insurance Company of the West--EKG), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 6 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Insurance Company of the West--echo), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 7 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Insurance Company of the West--AIM study), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 8 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (ESIS Insurance--ADL), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 9 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Hartford Insurance--ADL), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 10 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Hartford Insurance--EKG), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 11 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Hartford Insurance--echo), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 12 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (State Compensation Insurance Fund--ADL), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 13 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (State Compensation Insurance Fund--pain assessment), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 14 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (AmTrust North America--ADL), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 15 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Gallagher Bassett--ADL), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 16 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Gallagher Bassett--pain assessment), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 17 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Gallagher Bassett--AIM study), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 18 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Zenith Insurance--ADL), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 19 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Zenith Insurance--echo), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 20 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Zurich North America Insurance--ADL), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 21 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Zurich North America Insurance--pain assessment), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 22 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Preferred Employer Insurance--EKG), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 23 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Preferred Employer Insurance--echo), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 24 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Sedgwick Claims--EKG), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 25 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Sedgwick Claims--echo), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 26 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 23, 2014 and November 27, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Sedgwick Claims--AIM study), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 27 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about September 18, 2014, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ did offer, deliver, receive and accept, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 28 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about January 23, 2015, AMIR OBAIDULLAH KHAN, FARHAT FATIMA KHAN, and ALEXANDER KIEV MARTINEZ, did 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 or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 29 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about and between September 17, 2014 and April 1, 2015, AMIR OBAIDULLAH KHAN and FARHAT FATIMA KHAN, did 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 or inducement for referring clients or patients to perform (NCVs) or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.



THIS INDICTMENT, NUMBERED SCD255520, CONSISTS OF 29 COUNTS.

"A TRUE BILL"

District Attorney, County of San Diego, State of California

Foreman of the Grand Jury

DATE: _____

DATE: _____



State of California Secretary of State

S

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

F864873

FILED

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

OCT-07 2015

1. CORPORATE NAME

SUNRISE DIAGNOSTICS, INC., A MEDICAL CORPORATION

2. CALIFORNIA CORPORATE NUMBER

C3366018

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
2500 E. BALL RD, ANAHEIM, CA 92806			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
2500 E. BALL RD, ANAHEIM, CA 92806			
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/ MELANIE WILLIS	ADDRESS 5010 LIBBIT, ENCINO, CA 91436	CITY	STATE	ZIP CODE
8. SECRETARY AMIR KHAN	ADDRESS 2500 E. BALL RD, ANAHEIM, CA 92806	CITY	STATE	ZIP CODE
9. CHIEF FINANCIAL OFFICER/ AMIR KHAN	ADDRESS 2500 E. BALL RD, ANAHEIM, CA 92806	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 MELANIE WILLIS	ADDRESS 5010 LIBBIT, ENCINO, CA 91436	CITY	STATE	ZIP CODE
11. NAME AMIR KHAN	ADDRESS 2500 E. BALL RD, ANAHEIM, CA 92806	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 AMIR O KHAN				
15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE	ZIP CODE	
2500 E. BALL RD, ANAHEIM, CA 92806				

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
MEDICAL

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.

10/07/2015 AMIR O KHAN DR.
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE