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Sim C. Hoffman, MD, Inc., A Professional Corporation & Sim Carlisle Hoffman

Exhibit #	Document
1	People of the State of California v. Sim Carlisle Hoffman et al (Case no. 14CF0243)
2	CA Secretary of State: Statement of Information, 02/25/2009

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, vs. SIM CARLISLE HOFFMAN 06/01/52 E0255904 BETTER SLEEPING MEDICAL CENTER. INC. ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC. PACIFIC SLEEP MEDICAL GROUP, INC. ADVANCED MEDICAL SUPPORT, INC. THOMAS MICHAEL HERIC MD 11/03/36 D0407620 Defendant(s)	FELONY COMPLAINT No. 14CF0243 OCDA WC14010012

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

COUNT 1: On or about and between December 10, 2008 and July 28, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF SAN BERNARDINO for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

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COUNT 2: On or about and between September 17, 2007 and July 28, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 SAN BERNARDINO, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN:26-0778546)

COUNT 3: On or about and between January 26, 2001 and August 06, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC. with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF SAN BERNARDINO for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 4: On or about and between May 11, 2011 and March 05, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF SAN BERNARDINO for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 5: On or about and between November 27, 2007 and December 04, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CITY OF LOS ANGELES for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

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COUNT 6: On or about and between November 27, 2007 and December 04, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 LOS ANGELES, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN:26-0778546)

COUNT 7: On or about and between February 11, 2010 and January 01, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CITY OF LOS ANGELES for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 8: On or about and between August 18, 2010 and November 21, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF LOS ANGELES for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

COUNT 9: On or about and between November 27, 2007 and December 04, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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, solicit, and conspire with another to do the same.(TIN:26-0778545)

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COUNT 10: On or about and between September 28, 2012 and November 27, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: PACIFIC SLEEP MEDICAL GROUP, INC. with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF LOS ANGELES for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:27-2677504)

COUNT 11: On or about and between July 26, 2010 and August 04, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF LOS ANGELES for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 12: On or about and between July 11, 2011 and November 04, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF LOS ANGELES for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 13: On or about and between November 24, 2007 and July 08, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF LOS ANGELES for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN:20-8804326)

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COUNT 14: On or about and between March 30, 2006 and January 17, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF RIVERSIDE for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 15: On or about and between June 20, 2011 and September 09, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF RIVERSIDE for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 16: On or about and between May 15, 2008 and July 12, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF RIVERSIDE for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 17: On or about and between May 15, 2008 and July 12, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 RIVERSIDE, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 18: On or about and between August 27, 2007 and December 14, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF RIVERSIDE for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: NERVE TEST

COUNT 19: On or about and between February 07, 2005 and March 08, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF RIVERSIDE for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 20: On or about and between June 07, 2010 and September 14, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COUNTY OF SAN DIEGO for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

COUNT 21: On or about and between June 07, 2010 and September 14, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 SAN DIEGO, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN:26-0778546)

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COUNT 22: On or about and between October 15, 2007 and July 28, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to TRAVELERS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

COUNT 23: On or about and between September 17, 2007 and July 28, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 TRAVELERS, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN:26-0778546)

COUNT 24: On or about and between May 07, 2012 and December 24, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to TRAVELERS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:27-2677504)

COUNT 25: On or about and between June 07, 2005 and July 16, 2009, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to TRAVELERS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN:33-0565809) TO WIT: NERVE TEST

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COUNT 26: On or about and between January 17, 2005 and November 21, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to TRAVELERS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN:33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 27: On or about and between September 10, 2007 and November 21, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to TRAVELERS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 28: On or about and between July 11, 2011 and December 30, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to TRAVELERS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 29: On or about and between February 05, 2008 and June 24, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to REPUBLIC INDEMNITY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

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COUNT 30: On or about and between February 05, 2008 and June 24, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 REPUBLIC INDEMNITY, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 31: On or about and between April 25, 2013 and May 29, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to REPUBLIC INDEMNITY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 27-2677504)

COUNT 32: On or about and between February 04, 2010 and December 23, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to REPUBLIC INDEMNITY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 33: On or about and between June 09, 2010 and February 21, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to REPUBLIC INDEMNITY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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COUNT 34: On or about and between September 06, 2011 and April 26, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC.with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to REPUBLIC INDEMNITY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 35: On or about and between April 30, 2008 and August 04, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CRUM & FORSTER for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 36: On or about and between April 30, 2008 and August 04, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 CRUM & FORSTER, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN:26-0778546)

COUNT 37: On or about and between January 18, 2008 and January 15, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to BERKSHIRE HATHAWAY HOMESTATE CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

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COUNT 38: On or about and between August 11, 2006 and October 04, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 BERKSHIRE HATHAWAY HOMESTATE CO., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 39: On or about and between August 11, 2006 and October 04, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to BERKSHIRE HATHAWAY HOMESTATE CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:33-0565809) TO WIT: NERVE TEST

COUNT 40: On or about and between January 06, 2009 and February 13, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to BERKSHIRE HATHAWAY HOMESTATE CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 41: On or about and between July 13, 2011 and December 17, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to BERSHIRE HATHAWAY HOMESTATE CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 42: On or about and between August 13, 2008 and March 25, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to BERKSHIRE HATHAWAY HOMESTATE CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 43: On or about and between March 11, 2008 and November 19, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AIG (CHARTIS) for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

COUNT 44: On or about and between April 24, 2008 and May 16, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 AIG (CHARTIS), in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 45: On or about and between July 31, 2012 and October 30, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AIG (CHARTIS) for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

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COUNT 46: On or about and between May 18, 2011 and November 26, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AIG (CHARTIS) for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 47: On or about and between July 25, 2006 and July 15, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AIG (CHARTIS) for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 48: On or about and between September 17, 2007 and November 25, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AIG (CHARTIS) for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 49: On or about and between March 13, 2008 and August 16, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CNA INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 50: On or about and between March 13, 2008 and August 16, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 CNA INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 260778546)

COUNT 51: On or about and between July 27, 2012 and March 20, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CNA INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

COUNT 52: On or about and between May 17, 2005 and January 08, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CNA INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN:33-0565809) TO WIT: NERVE TEST

COUNT 53: On or about and between July 06, 2010 and February 11, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CNA INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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COUNT 54: On or about and between December 21, 2011 and April 26, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CNA INS for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 55: On or about and between July 13, 2011 and April 25, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CNA INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 56: On or about and between February 04, 2008 and August 01, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FIRST COMP INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 57: On or about and between February 04, 2008 and August 01, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 FIRST COMP INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same. (26-0778546)

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COUNT 58: On or about and between March 31, 2009 and June 23, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FIRST COMP INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 59: On or about and between January 20, 2012 and December 23, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FIRST COMP INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 60: On or about and between September 28, 2009 and April 30, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FIRST COMP INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 20-8804326)

COUNT 61: On or about and between February 05, 2008 and January 22, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to HARTFORD INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 62: On or about and between February 05, 2008 and January 22, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 HARTFORD INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 63: On or about July 30, 2012, in violation of Section 550 (a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to HARTFORD INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

COUNT 64: On or about and between April 10, 2010 and April 12, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to HARTFORD INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 65: On or about and between February 04, 2008 and July 31, 2008, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to MATRIX INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

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COUNT 66: On or about and between February 04, 2008 and July 31, 2008, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 MARTIX INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 67: On or about and between October 16, 2008 and July 06, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SEABRIGHT INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 68: On or about and between October 16, 2008 and July 06, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 EMPLOYERS INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(26-0778546)

COUNT 69: On or about and between February 05, 2008 and September 14, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

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COUNT 70: On or about and between February 05, 2008 and September 14, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 EMPLOYERS INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 71: On or about and between April 24, 2012 and November 13, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INC. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

COUNT 72: On or about and between March 31, 2011 and January 09, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 73: On or about and between June 28, 2012 and November 06, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 74: On or about and between November 27, 2007 and October 10, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 75: On or about and between January 11, 2008 and January 25, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SCRMA INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 76: On or about and between January 11, 2008 and January 25, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 SCRMA INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

COUNT 77: On or about and between March 13, 2008 and June 25, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SPECIALY RISK SERVICES INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 78: On or about and between March 13, 2008 and June 25, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 SPECIALTY RISK SERVICES INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 79: On or about and between January 28, 2008 and March 24, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZENITH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 80: On or about and between January 28, 2008 and March 24, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 ZENITH INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 81: On or about and between December 09, 2004 and March 07, 2008, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZENITH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: NERVE TEST

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COUNT 82: On or about and between March 03, 2010 and June 24, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZENITH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 83: On or about and between July 14, 2011 and May 14, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZENITH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 84: On or about and between October 03, 2006 and July 16, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZENITH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 85: On or about and between June 25, 2008 and January 25, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SENTRY INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 86: On or about and between June 25, 2008 and January 25, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 SENTRY INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN:26-0778546)

COUNT 87: On or about and between January 09, 2008 and August 15, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY,SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZURICH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 88: On or about and between January 09, 2008 and August 15, 2013, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 ZURICH INS., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-078546)

COUNT 89: On or about and between June 16, 2010 and May 03, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZURICH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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COUNT 90: On or about and between July 15, 2011 and December 16, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZURICH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 91: On or about and between October 11, 2010 and August 24, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ZURICH INS. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 92: On or about and between December 29, 2007 and December 02, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to STATE FUND for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

COUNT 93: On or about and between December 29, 2007 and December 02, 2013, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 FUND, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 94: On or about and between September 10, 2012 and October 30, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to STATE FUND for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

COUNT 95: On or about and between July 18, 2005 and January 08, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to STATE FUND for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: NERVE TEST

COUNT 96: On or about and between May 11, 2006 and December 09, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to STATE FUND for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 97: On or about and between April 13, 2012 and October 07, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to STATE FUND for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 98: On or about and between July 05, 2008 and December 03, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to STATE FUND for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 99: On or about and between May 18, 2008 and April 21, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CHUBB INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

COUNT 100: On or about and between May 18, 2008 and April 21, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 CHUBB INSURANCE GROUP, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 101: On or about and between September 02, 2005 and February 01, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CHUBB INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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COUNT 102: On or about and between August 21, 2007 and March 17, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CHUBB INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 20-8804326)

COUNT 103: On or about and between April 22, 2011 and March 13, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ICW GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 104: On or about and between April 22, 2011 and March 13, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 GROUP, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

COUNT 105: On or about and between October 01, 2012 and October 08, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ICW GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

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COUNT 106: On or about and between May 01, 2013 and September 21, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ICW GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 107: On or about and between January 05, 2011 and May 17, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ICW GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 108: On or about and between April 22, 2011 and December 14, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to ICW GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 109: On or about and between February 28, 2008 and October 02, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COMPWEST INS. CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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COUNT 110: On or about and between March 10, 2008 and August 01, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COMPWEST INS. CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

COUNT 111: On or about and between March 10, 2008 and August 01, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 COMPWEST INS. CO., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 112: On or about and between March 13, 2012 and January 18, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COMPWEST INS. CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 113: On or about and between July 12, 2011 and October 01, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to COMPWEST INS. CO. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 114: On or about December 13, 2010, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SAFEWAY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 115: On or about December 13, 2010, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 SAFEWAY, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 116: On or about December 20, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SAFEWAY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

COUNT 117: On or about and between December 21, 2004 and May 29, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SAFEWAY AND ACIG for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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COUNT 118: On or about December 30, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SAFEWAY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 119: On or about April 30, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to SAFEWAY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 20-8804326)

COUNT 120: On or about and between July 18, 2005 and November 26, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to PACIFIC COMPENSATION INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809)TO WIT: 3D IMAGING / MRI

COUNT 121: On or about and between October 04, 2006 and September 13, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to PACIFIC COMPENSATION INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 26-0778546)

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COUNT 122: On or about and between October 04, 2006 and September 13, 2013, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 INSURANCE COMPANY, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 123: On or about and between February 22, 2007 and September 20, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to PACIFIC COMPENSATION INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 124: On or about and between August 10, 2011 and September 05, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to PACIFIC COMPENSATION INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 125: On or about and between October 15, 2010 and July 29, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 126: On or about and between October 15, 2010 and July 29, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G., in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 127: On or about and between May 04, 2012 and November 02, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

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COUNT 128: On or about and between December 23, 2010 and December 27, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: NERVE TEST

COUNT 129: On or about and between March 02, 2011 and July 22, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 130: On or about and between January 19, 2012 and December 16, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 131: On or about and between July 05, 2011 and August 15, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to GALLAGHER BASSETT / ACE, ACIS, ALLIED, ARCH, EVEREST, OLD REPUBLIC, SPARTA AND USF&G. for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 132: On or about and between September 28, 2012 and October 03, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FIREMANS' FUND for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 133: On or about and between September 02, 2009 and December 30, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FARMERS INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 134: On or about and between September 02, 2009 and December 30, 2013, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 FARMERS INSURANCE GROUP, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 135: On or about and between December 05, 2012 and October 07, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FARMERS INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

COUNT 136: On or about and between February 21, 2005 and October 16, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FARMERS INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: NERVE TEST

COUNT 137: On or about and between December 30, 2009 and May 13, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FARMERS INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 138: On or about and between November 03, 2011 and November 07, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FARMERS INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 139: On or about and between April 22, 2010 and October 10, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to FARMERS INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

COUNT 140: On or about and between August 10, 2009 and September 14, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 141: On or about and between August 10, 2009 and September 14, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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 EMPLOYERS INSURANCE GROUP, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 142: On or about and between April 24, 2012 and November 13, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

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COUNT 143: On or about and between March 02, 2010 and February 14, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 144: On or about and between June 28, 2012 and November 06, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 145: On or about and between December 27, 2007 and November 01, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to EMPLOYERS INSURANCE GROUP for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 20-8804326)

COUNT 146: On or about and between December 11, 2009 and August 20, 2012, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

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COUNT 147: On or about and between December 11, 2009 and August 20, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 148: On or about and between December 11, 2012 and November 11, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(27-2677504)

COUNT 149: On or about and between November 08, 2005 and April 03, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: NERVE TEST

COUNT 150: On or about and between June 05, 2009 and July 26, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

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COUNT 151: On or about and between July 13, 2011 and December 02, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 152: On or about and between December 11, 2009 and October 09, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to AMERICAN CLAIMS MANAGEMENT for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:20-8804326)

COUNT 153: On or about and between September 14, 2009 and July 01, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his companies: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC. and SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to CHURCH MUTUAL INSURANCE COMPANY for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN: 33-0565809) (TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

COUNT 154: On or about and between October 29, 2010 and August 01, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to LIBERTY MUTUAL for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same. (TIN:26-0778546)

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COUNT 155: On or about and between October 29, 2010 and August 01, 2011, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, SIM CARLISLE HOFFMAN and his company: BETTER SLEEPING MEDICAL CENTER, INC. and THOMAS HERIC, 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, in support of a false and fraudulent claim, and did aid and abet, solicit, and conspire with another to do the same.(TIN: 26-0778546)

COUNT 156: On or about and between May 10, 2012 and October 31, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to LIBERTY MUTUAL for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-2677504)

COUNT 157: On or about and between June 01, 2010 and July 17, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to LIBERTY MUTUAL for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 33-0565809) TO WIT: 3D IMAGING / MRI

COUNT 158: On or about and between July 14, 2011 and September 13, 2011, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to LIBERTY MUTUAL for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 27-3236269) TO WIT: 3D IMAGING / MRI

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COUNT 159: On or about and between September 08, 2011 and April 29, 2013, in violation of Section 550(a)(6) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, SIM CARLISLE HOFFMAN and his company: ADVANCED MEDICAL SUPPORT, INC., with the intent to defraud, did knowingly and unlawfully make and cause to be made a false and fraudulent claim to LIBERTY MUTUAL for payment of a health care benefit in an amount exceeding nine hundred fifty dollars ($950), and did aid and abet, solicit, and conspire with another to do the same.(TIN: 20-8804326)

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, 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, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158 and 159, defendants SIM CARLISLE HOFFMAN, BETTER SLEEPING MEDICAL CENTER. INC., ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., PACIFIC SLEEP MEDICAL GROUP, INC., ADVANCED MEDICAL SUPPORT, INC. and THOMAS MICHAEL HERIC MD engaged in a pattern of related fraudulent felony conduct involving the taking of more than five hundred thousand dollars ($500,000).

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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, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158 and 159, it is further alleged pursuant to Penal Code section 12022.6(a)(4) (PROPERTY DAMAGE OVER $3,200,000), that SIM CARLISLE HOFFMAN, BETTER SLEEPING MEDICAL CENTER. INC., ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP, SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC., PACIFIC SLEEP MEDICAL GROUP, INC., ADVANCED MEDICAL SUPPORT, INC. and THOMAS MICHAEL HERIC 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 01-27-2014 at Orange County, California.
KS/AR 14F09001

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: _____
Deputy District Attorney

RESTITUTION CLAIMED

[ ] None
[ ] $_____
[X] To be determined

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PROP36/PC1000 ELIGIBILITY:

SIM CARLISLE HOFFMAN - Prop36 INELIGIBLE/PC1000 INELIGIBLE
BETTER SLEEPING MEDICAL CENTER. INC. - N/A / N/A
ADVANCED PROFESSIONAL IMAGING MEDICAL GROUP - N/A / N/A
SOUTHERN CALIFORNIA MEDICAL DIAGNOSTICS GROUP, INC. - N/A / N/A
PACIFIC SLEEP MEDICAL GROUP, INC. - N/A / N/A
ADVANCED MEDICAL SUPPORT, INC. - N/A / N/A
THOMAS MICHAEL HERIC MD - Prop36 INELIGIBLE/PC1000 INELIGIBLE

BAIL RECOMMENDATION:

SIM CARLISLE HOFFMAN - $ 20,000,000.00
THOMAS MICHAEL HERIC MD - $ 100,000.00

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.

09-0939111

State of California
Secretary of State

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

FEB 25 2009

This Space For Filing Use Only

STATEMENT OF INFORMATION
(Domestic Stock and Agricultural Cooperative Corporations)
FEES (Filing and Disclosure): $25.00. If amendment, see instructions.
IMPORTANT — READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

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

SIM C. HOFFMAN, MD, INC., A PROFESSIONAL CORPORATION
6800 LINCOLN AVENUE, SUITE 100
BUENA PARK, CA 90620-4163
CORPORATE NUMBER: 02413497

C2413497

DUE DATE:

NO CHANGE STATEMENT (Not applicable if agent address of record is a P.O. Box address. See instructions.)

2. ☐ If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed **to Item 16**.

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

COMPLETE ADDRESSES FOR THE FOLLOWING (Do not abbreviate the name of the city. Items 3 and 4 cannot be P.O. Boxes.)

	CITY	STATE	ZIP CODE
3. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164
4. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY 6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164
5. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 3 6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164

NAMES AND COMPLETE ADDRESSES OF THE FOLLOWING OFFICERS (The corporation must have these three officers. A comparable title for the specific officer may be added, however, the preprinted titles on this form must not be altered.)

	ADDRESS	CITY	STATE	ZIP CODE
6. CHIEF EXECUTIVE OFFICER/ SIM C. HOFFMAN, MD	6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164
7. SECRETARY/ SIM C. HOFFMAN, MD	6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164
8. CHIEF FINANCIAL OFFICER/ SIM C. HOFFMAN, MD	6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164

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

	ADDRESS	CITY	STATE	ZIP CODE
9. NAME SIM C. HOFFMAN, MD	6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164
10. NAME				
11. NAME				

12. 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 14 must be completed with a California street address (a P.O. Box address is not acceptable). If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 14 must be left blank.)

13. NAME OF AGENT FOR SERVICE OF PROCESS
SIM C. HOFFMAN, MD

	CITY	STATE	ZIP CODE
14. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF **AN INDIVIDUAL** 6800 LINCOLN AVENUE, SUITE 200	BUENA PARK	CA	90620-4164

TYPE OF BUSINESS

15. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
HEALTH CARE SERVICES

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

DATE	TYPE/PRINT NAME OF PERSON COMPLETING FORM	TITLE	SIGNATURE
2/20/2009	SIM C. HOFFMAN, MD	PRESIDENT	