

# INDEX

True Care Medical Group, Inc. & Andrew Robert Jarminski

Exhibit #	Document
1	People of the State of California v. Andrew Robert Jarminski et al (Case no. 16CF1351)
2	CA Secretary of State: Statement of Information, 04/11/2017

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

**ELECTRONICALLY FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE

05/20/2016  
11:26 AM

ALAN CARLSON, Clerk of the Court  
**16CF1351**

6 THE PEOPLE OF THE STATE OF CALIFORNIA, ) **FELONY COMPLAINT**  
7 ) **REFILED 14ZF0335**  
8 Plaintiff, )  
9 )  
10 vs. ) **No.**  
11 KAREEM AHMED 11/09/68 ) **OCDA WC11110008**  
12 U6071087 ) **OCDA WC14020016**  
13 AKA KAREEM AHMED ) **OCDA WC13050008**  
14 ANDREW ROBERT JARMINSKI 10/23/62 ) **OCDA WC12060007**  
15 V8109555 ) **OCDA WC15020009**  
16 AKA ANDREW ROBERT JARMINSKI MD )  
17 MICHAEL RUDOLPH 02/21/50 )  
18 NORMA REYNA GARNER 03/05/72 )  
19 A1884682 )  
20 AKA NORMA REYNA RUIZ )  
21 NORMA REYNA ARELLANO )  
22 Defendant(s)

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

22 COUNT 1: On or about February 03, 2012, in violation of Section  
23 192(b) of the Penal Code (INVOLUNTARY MANSLAUGHTER BY LAWFUL ACT  
24 IN UNLAWFUL MANNER), a FELONY, KAREEM AHMED, ANDREW ROBERT  
25 JARMINSKI and MICHAEL RUDOLPH did unlawfully and without malice  
26 kill ANDREW G.(a minor), a human being, in the commission of a  
lawful act which might produce death, in an unlawful manner and  
without due caution and circumspection.

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1 COUNT 2: On or about February 03, 2012, in violation of Section  
2 192(b) of the Penal Code (INVOLUNTARY MANSLAUGHTER BY UNLAWFUL  
3 ACT), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and  
4 MICHAEL RUDOLPH did unlawfully and without malice kill ANDREW G.  
5 (a minor), a human being, as a proximate result of the  
6 commission by the defendants of a noninherently dangerous  
7 felony, or non-felonious unlawful act, to wit: a violation of  
8 Section 550(a)(6) of the Penal Code Code.

7 COUNT 3: On or about and between October 01, 2009 and January  
8 31, 2013, in violation of Section 550(a)(6) of the Penal Code  
9 (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, KAREEM  
10 AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH did  
11 unlawfully conspire with OTHER UNKNOWN CO-CONSPIRATORS, with the  
12 intent to defraud, to make a false and fraudulent claim to  
13 WORKERS COMPENSATION INSURANCE CARRIERS for payment of a health  
14 care benefit in an amount exceeding nine hundred fifty dollars  
15 (\$950). It is further alleged that pursuant to and for the  
16 purpose of carrying out the objects and purposes of the  
17 conspiracy, one and more of the conspirators committed the  
18 following overt acts:

15 OVERT ACT 1

16  
17 On or about October 1 2009, Kareem Ahmed, Evette Charbonnet,  
18 Bruce Curnick met with a pharmacist to formulate three compound  
19 transdermal creams based on the profitability of the ingredients  
20 in Orange County, California.

20 OVERT ACT 2

21 Kareem Ahmed directed his employees to identify and recruit  
22 medical providers who treated workers compensation patients to  
23 dispense and prescribe these compound transdermal creams.

24 OVERT ACT 3

25 Under the guise of purchasing the medical provider's accounts  
26 receivables, Ahmed gave financial incentives to the physicians  
27 to dispense and prescribe the compound transdermal creams he  
28 helped formulate to workers compensation patients.

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OVERT ACT 4

Between June 17, 2010 and December 31, 2012, Ahmed paid medical providers over 25 million dollar to dispense and prescribe transdermal compound creams which were primarily manufactured by pharmacists he had contracts with, namely, Curt's Compounding Pharmacy in Orange County California, and Healthcare Pharmacy in Orange County, California

OVERT ACT 5

On or about November 30, 2010, Michael Rudolph, a pharmacist, and owner of Tustin Community Pharmacy DBA Healthcare Pharmacy, in Orange County, California, entered into an agreement with Ahmed to manufacture and distribute Ahmed's compound transdermal cream formulas to workers compensation patients.

OVERT ACT 6

Ahmed gave his financial "kickback" scheme the appearance of legitimacy by requiring the medical providers and the pharmacists to sign a contract for purchase of future account receivables.

OVERT ACT 7

At Ahmed's direction, Curt's Compounding Pharmacy in Orange County, California and Healthcare Pharmacy in Orange County California, manufactured a 3-day supply of the transdermal compound cream and gave it to physicians who had a contract with Ahmed to distribute to workers compensation patients and justify the medical provider's ability to bill insurance carriers for distribution of these creams.

OVERT ACT 8

Ahmed would not purchase accounts receivables from any of the medical providers who did not also prescribe the accompanying "remaining month supply" to each workers compensation patient who was given a 3-day supply in the physician's office.

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OVERT ACT 9

Ahmed purchased accounts receivables from medical providers and paid physicians under the following companies: Physician's Funding Solution, Med-RX and Healthcare Finance Management..

OVERT ACT 10

Between June 17, 2010 and December 31, 2012, Ahmed purchased accounts receivables from Pharmacies including Healthcare Pharmacy owned by Rudolph under the following company: PharmaFinance and posted a profit of over \$69 million dollars.

OVERT ACT 11

Dr. Andrew Jarminski, M.D. entered into an agreement with Ahmed in 2010 to distribute transdermal compound creams which were manufactured by Healthcare Pharmacy and Curt's Compounding Pharmacy in Orange County California.

OVERT ACT 12

Under the guise of selling his accounts receivables to Ahmed, Dr. Jarminski received kickbacks to prescribe transdermal compound creams manufactured by Healthcare Pharmacy and Curt's Compounding Pharmacy.

OVERT ACT 13

Ahmed would not purchase accounts receivables from Jarminski unless they were for prescriptions relating to transdermal compound creams Ahmed formulated and had manufactured by Healthcare Pharmacy or Curt's Compounding Pharmacy in Orange County.

OVERT ACT 14

Between 2010 and 2013, Ahmed paid Dr. Jaminski in excess of million and Nine Hundred thousand dollars (\$1,900,000) because Dr. Jarminski and his physician's assistants dispensed and prescribed at least two compound creams regardless of medical necessity to each workers compensation patient he treated between 2010 and 2013.

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OVERT ACT 15

The last payment issued to Andrew Jarminski by Ahmed, and his company, Healthcare Finance Management was for \$3,040 on 12/28/12.

OVERT ACT 16

Between 2010 and January 2013, Ahmed paid Michael Rudolph and Healthcare Pharmacy in Orange County in excess of one million dollars (\$1,000,000) to manufacture, distribute and ship transdermal compound creams to workers compensation patients.

COUNT 4: On or about and between June 17, 2011 and December 31, 2012, in violation of Section 650 of the Business & Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY, ANDREW ROBERT JARMINSKI, a person licensed under the Healing Arts Division of this Code and the Chiropractic Initiative Act, did unlawfully offer, deliver, receive, and accept any rebate, refund, commission, preference, patronage dividend, discount, and other consideration as compensation and inducement for referring patients, clients, and customers to CURT'S COMPOUNDING PHARMACY IN FOUNTAIN VALLEY, CALIFORNIA AND TUSTIN COMMUNITY PHARMACY INC. DBA HEALTHCARE PHARMACY.

COUNT 5: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, 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 AIMS, in support of a false and fraudulent claim, and did aid and abet, and solicit another to do the same.

COUNT 6: On or about and between June 17, 2010 and December 31, 2012, in violation of Section 550(a)(5) of the Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, 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, and solicit another to do the same.

1 COUNT 7: On or about and between June 17, 2010 and December 31,  
2 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
7 it, and to allow it to be presented to HARTFORT INS., in support  
8 of a false and fraudulent claim, and did aid and abet, and  
9 solicit another to do the same.

10 COUNT 8: On or about and between June 17, 2010 and December 31,  
11 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
13 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
14 defraud, did knowingly and unlawfully prepare, make, and  
15 subscribe a material writing, with the intent to present and use  
16 it, and to allow it to be presented to GALLAGHER BASSETT, in  
17 support of a false and fraudulent claim, and did aid and abet,  
18 and solicit another to do the same.

19 COUNT 9: On or about and between June 17, 2010 and December 31,  
20 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
22 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
23 defraud, did knowingly and unlawfully prepare, make, and  
24 subscribe a material writing, with the intent to present and use  
25 it, and to allow it to be presented to ZURICH INS., in support  
26 of a false and fraudulent claim, and did aid and abet, and  
27 solicit another to do the same.

28 COUNT 10: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, 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, and solicit another to do the same.

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1 COUNT 11: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
7 it, and to allow it to be presented to LIBERTY MUTUAL INS., in  
8 support of a false and fraudulent claim, and did aid and abet,  
9 and solicit another to do the same.

10 COUNT 12: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
13 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
14 defraud, did knowingly and unlawfully prepare, make, and  
15 subscribe a material writing, with the intent to present and use  
16 it, and to allow it to be presented to SEDGWICK, in support of a  
17 false and fraudulent claim, and did aid and abet, and solicit  
18 another to do the same.

19 COUNT 13: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
22 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
23 defraud, did knowingly and unlawfully prepare, make, and  
24 subscribe a material writing, with the intent to present and use  
25 it, and to allow it to be presented to C.N.A. INS., in support  
26 of a false and fraudulent claim, and did aid and abet, and  
27 solicit another to do the same.

28 COUNT 14: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
defraud, did knowingly and unlawfully prepare, make, and  
subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to FIREMAN'S FUND INS., in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

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1 COUNT 15: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
7 it, and to allow it to be presented to TRISTAR, in support of a  
8 false and fraudulent claim, and did aid and abet, and solicit  
9 another to do the same.

10 COUNT 16: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
13 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
14 defraud, did knowingly and unlawfully prepare, make, and  
15 subscribe a material writing, with the intent to present and use  
16 it, and to allow it to be presented to BERKSHIRE HATHAWAY  
17 HOMESTATE, in support of a false and fraudulent claim, and did  
18 aid and abet, and solicit another to do the same.

19 COUNT 17: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
22 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
23 defraud, did knowingly and unlawfully prepare, make, and  
24 subscribe a material writing, with the intent to present and use  
25 it, and to allow it to be presented to STATE COMPENSATION  
26 INSURANCE FUND, in support of a false and fraudulent claim, and  
27 did aid and abet, and solicit another to do the same.

28 COUNT 18: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, 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 INS.,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

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1 COUNT 19: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
7 it, and to allow it to be presented to SENTRY INS., in support  
8 of a false and fraudulent claim, and did aid and abet, and  
9 solicit another to do the same.

10 COUNT 20: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
13 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
14 defraud, did knowingly and unlawfully prepare, make, and  
15 subscribe a material writing, with the intent to present and use  
16 it, and to allow it to be presented to AIG/CHARTIS, in support  
17 of a false and fraudulent claim, and did aid and abet, and  
18 solicit another to do the same.

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

28 COUNT 22: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, 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,  
and solicit another to do the same.

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1 COUNT 23: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
7 it, and to allow it to be presented to FARMERS INS., in support  
8 of a false and fraudulent claim, and did aid and abet, and  
9 solicit another to do the same.

10 COUNT 24: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
13 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
14 defraud, did knowingly and unlawfully prepare, make, and  
15 subscribe a material writing, with the intent to present and use  
16 it, and to allow it to be presented to MARKEL FIRST COMP INS.,  
17 in support of a false and fraudulent claim, and did aid and  
18 abet, and solicit another to do the same.

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

28 COUNT 26: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, 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, and  
solicit another to do the same.

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1 COUNT 27: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
7 it, and to allow it to be presented to SEABRIGHT INS., in  
8 support of a false and fraudulent claim, and did aid and abet,  
9 and solicit another to do the same.

10 COUNT 28: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
13 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
14 defraud, did knowingly and unlawfully prepare, make, and  
15 subscribe a material writing, with the intent to present and use  
16 it, and to allow it to be presented to STATE FARM, in support of  
17 a false and fraudulent claim, and did aid and abet, and solicit  
18 another to do the same.

19 COUNT 29: On or about and between June 17, 2010 and December  
20 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
22 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
23 defraud, did knowingly and unlawfully prepare, make, and  
24 subscribe a material writing, with the intent to present and use  
25 it, and to allow it to be presented to EMPLOYERS INS., in  
26 support of a false and fraudulent claim, and did aid and abet,  
27 and solicit another to do the same.

28 COUNT 30: On or about and between June 17, 2010 and December  
31, 2012, in violation of Section 550(a)(5) of the Penal Code  
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, 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,  
and solicit another to do the same.

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1 COUNT 31: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 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,  
and solicit another to do the same.

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8 COUNT 32: On or about and between June 17, 2010 and December  
9 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
10 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
11 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
12 defraud, did knowingly and unlawfully prepare, make, and  
13 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to VONS, in support of a  
false and fraudulent claim, and did aid and abet, and solicit  
another to do the same.

14 COUNT 33: On or about and between June 17, 2010 and December  
15 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
16 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
17 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
18 defraud, did knowingly and unlawfully prepare, make, and  
19 subscribe a material writing, with the intent to present and use  
20 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, and solicit another to do the same.

21 COUNT 34: On or about and between June 17, 2010 and December  
22 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
23 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
24 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
25 defraud, did knowingly and unlawfully prepare, make, and  
26 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to KAISER, in support of a  
false and fraudulent claim, and did aid and abet, and solicit  
another to do the same.

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1 COUNT 35: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to CITY OF GARDENA, in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

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8 COUNT 36: On or about and between June 17, 2010 and December  
9 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
10 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
11 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
12 defraud, did knowingly and unlawfully prepare, make, and  
13 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to CITY OF SANTA MONICA, in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

14 COUNT 37: On or about and between June 17, 2010 and December  
15 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
16 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
17 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
18 defraud, did knowingly and unlawfully prepare, make, and  
19 subscribe a material writing, with the intent to present and use  
20 it, and to allow it to be presented to CITY OF LONG BEACH, in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

21 COUNT 38: On or about and between June 17, 2010 and December  
22 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
23 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
24 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
25 defraud, did knowingly and unlawfully prepare, make, and  
26 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to CITY OF PASADENA, in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

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1 COUNT 39: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to CITY OF TORRANCE, in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

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8 COUNT 40: On or about and between June 17, 2010 and December  
9 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
10 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
11 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
12 defraud, did knowingly and unlawfully prepare, make, and  
13 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to CITY OF RIVERSIDE, in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

14 COUNT 41: On or about and between June 17, 2010 and December  
15 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
16 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
17 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
18 defraud, did knowingly and unlawfully prepare, make, and  
19 subscribe a material writing, with the intent to present and use  
20 it, and to allow it to be presented to CITY OF HUNTINGTON BEACH,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

21 COUNT 42: On or about and between June 17, 2010 and December  
22 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
23 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
24 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
25 defraud, did knowingly and unlawfully prepare, make, and  
26 subscribe a material writing, with the intent to present and use  
it, and to allow it to be presented to COUNTY OF LOS ANGELES, in  
support of a false and fraudulent claim, and did aid and abet,  
and solicit another to do the same.

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1 COUNT 43: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
4 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
5 defraud, did knowingly and unlawfully prepare, make, and  
6 subscribe a material writing, with the intent to present and use  
7 it, and to allow it to be presented to NORDSTROM, in support of  
8 a false and fraudulent claim, and did aid and abet, and solicit  
9 another to do the same.

10 COUNT 44: On or about and between June 17, 2010 and December  
11 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,  
13 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to  
14 defraud, did knowingly and unlawfully prepare, make, and  
15 subscribe a material writing, with the intent to present and use  
16 it, and to allow it to be presented to CITY OF GARDENA, in  
17 support of a false and fraudulent claim, and did aid and abet,  
18 and solicit another to do the same.

19 COUNT 45: On or about and between June 17, 2011 and December  
20 31, 2012, in violation of Section 549 of the Penal Code (FALSE  
21 AND FRAUDULENT CLAIM), a FELONY, ANDREW ROBERT JARMINSKI did  
22 unlawfully solicit, accept, and refer business to and from MED-  
23 RX, LLC AND HEALTHCARE FINANCE MANAGEMENT, LLC, with the  
24 knowledge that, and with reckless disregard for whether MED-RX,  
25 LLC AND HEALTHCARE FINANCE MANAGEMENT, LLC intended to violate  
26 Penal Code section 550 and Insurance Code section 1871.4.

27 COUNT 46: On or about and between June 17, 2011 and December  
28 31, 2012, in violation of Section 549 of the Penal Code (FALSE  
AND FRAUDULENT CLAIM), a FELONY, MICHAEL RUDOLPH did unlawfully  
solicit, accept, and refer business to and from PHARMAFINANCE,  
LLC, with the knowledge that, and with reckless disregard for  
whether PHARMAFINANCE, LLC intended to violate Penal Code  
section 550 and Insurance Code section 1871.4.

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1 COUNT 47: On or about and between June 17, 2010 and December  
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and  
4 MICHAEL RUDOLPH, with the intent to defraud, did knowingly and  
5 unlawfully prepare, make, and subscribe a material writing, with  
6 the intent to present and use it, and to allow it to be  
presented to SRS, in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

7 COUNT 48: On or about and between June 17, 2010 and December  
8 31, 2012, in violation of Section 550(a)(5) of the Penal Code  
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED and  
10 MICHAEL RUDOLPH, with the intent to defraud, did knowingly and  
11 unlawfully prepare, make, and subscribe a material writing, with  
12 the intent to present and use it, and to allow it to be  
presented to TRAVELERS INS., in support of a false and  
fraudulent claim, and did aid and abet, and solicit another to  
do the same.

13 COUNT 49: On or about and between September 01, 2012 and  
14 December 22, 2012, in violation of Section 550(a)(5) of the  
15 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
16 AHMED, with the intent to defraud, did knowingly and unlawfully  
17 prepare, make, and subscribe a material writing, with the intent  
18 to present and use it, and to allow it to be presented to  
LIBERTY MUTUAL INS., in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

19 COUNT 50: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED, with the intent to defraud, did knowingly and unlawfully  
23 prepare, make, and subscribe a material writing, with the intent  
24 to present and use it, and to allow it to be presented to ZENITH  
INS., in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

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1 COUNT 51: On or about and between September 01, 2012 and  
2 December 22, 2012, in violation of Section 550(a)(5) of the  
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
4 AHMED, with the intent to defraud, did knowingly and unlawfully  
5 prepare, make, and subscribe a material writing, with the intent  
6 to present and use it, and to allow it to be presented to  
EMPLOYERS INS., in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

7 COUNT 52: On or about and between September 01, 2012 and  
8 December 22, 2012, in violation of Section 550(a)(5) of the  
9 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
10 AHMED, with the intent to defraud, did knowingly and unlawfully  
11 prepare, make, and subscribe a material writing, with the intent  
12 to present and use it, and to allow it to be presented to  
GALLAGHER BASSETT, in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

13 COUNT 53: On or about and between September 01, 2012 and  
14 December 22, 2012, in violation of Section 550(a)(5) of the  
15 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
16 AHMED, with the intent to defraud, did knowingly and unlawfully  
17 prepare, make, and subscribe a material writing, with the intent  
18 to present and use it, and to allow it to be presented to  
BERKSHIRE HATHAWAY HOMESTATE COMPANIES, in support of a false  
and fraudulent claim, and did aid and abet, and solicit another  
to do the same.

19 COUNT 54: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED, with the intent to defraud, did knowingly and unlawfully  
23 prepare, make, and subscribe a material writing, with the intent  
24 to present and use it, and to allow it to be presented to YORK,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

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1 COUNT 55: On or about and between September 01, 2012 and  
2 December 22, 2012, in violation of Section 550(a)(5) of the  
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
4 AHMED, with the intent to defraud, did knowingly and unlawfully  
5 prepare, make, and subscribe a material writing, with the intent  
6 to present and use it, and to allow it to be presented to ZURICH  
INS., in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

7 COUNT 56: On or about and between September 01, 2012 and  
8 December 22, 2012, in violation of Section 550(a)(5) of the  
9 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
10 AHMED, with the intent to defraud, did knowingly and unlawfully  
11 prepare, make, and subscribe a material writing, with the intent  
12 to present and use it, and to allow it to be presented to  
SEDGWICH, in support of a false and fraudulent claim, and did  
aid and abet, and solicit another to do the same.

13 COUNT 57: On or about and between September 01, 2012 and  
14 December 22, 2012, in violation of Section 550(a)(5) of the  
15 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
16 AHMED and MICHAEL RUDOLPH, with the intent to defraud, did  
17 knowingly and unlawfully prepare, make, and subscribe a material  
18 writing, with the intent to present and use it, and to allow it  
to be presented to ALASKA NATIONAL INS., in support of a false  
and fraudulent claim, and did aid and abet, and solicit another  
to do the same.

19 COUNT 58: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED and MICHAEL RUDOLPH, with the intent to defraud, did  
23 knowingly and unlawfully prepare, make, and subscribe a material  
24 writing, with the intent to present and use it, and to allow it  
to be presented to ESIS, in support of a false and fraudulent  
claim, and did aid and abet, and solicit another to do the same.

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1 COUNT 59: On or about and between September 01, 2012 and  
2 December 22, 2012, in violation of Section 550(a)(5) of the  
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
4 AHMED and MICHAEL RUDOLPH, with the intent to defraud, did  
5 knowingly and unlawfully prepare, make, and subscribe a material  
6 writing, with the intent to present and use it, and to allow it  
7 to be presented to C.N.A. INS., in support of a false and  
8 fraudulent claim, and did aid and abet, and solicit another to  
9 do the same.

10 COUNT 60: On or about and between September 01, 2012 and  
11 December 22, 2012, in violation of Section 550(a)(5) of the  
12 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
13 AHMED and MICHAEL RUDOLPH, with the intent to defraud, did  
14 knowingly and unlawfully prepare, make, and subscribe a material  
15 writing, with the intent to present and use it, and to allow it  
16 to be presented to FIREMAN'S FUND, in support of a false and  
17 fraudulent claim, and did aid and abet, and solicit another to  
18 do the same.

19 COUNT 61: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED and MICHAEL RUDOLPH, with the intent to defraud, did  
23 knowingly and unlawfully prepare, make, and subscribe a material  
24 writing, with the intent to present and use it, and to allow it  
25 to be presented to CRUM & FORSTER, in support of a false and  
26 fraudulent claim, and did aid and abet, and solicit another to  
27 do the same.

28 COUNT 62: On or about and between September 01, 2012 and  
December 22, 2012, in violation of Section 550(a)(5) of the  
Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
AHMED, 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  
KAISER, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

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1 COUNT 63: On or about and between September 01, 2012 and  
2 December 22, 2012, in violation of Section 550(a)(5) of the  
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
4 AHMED, with the intent to defraud, did knowingly and unlawfully  
5 prepare, make, and subscribe a material writing, with the intent  
6 to present and use it, and to allow it to be presented to  
7 AMERICAN CLAIMS MANAGEMENT, in support of a false and fraudulent  
8 claim, and did aid and abet, and solicit another to do the same.

7 COUNT 64: On or about and between September 01, 2012 and  
8 December 22, 2012, in violation of Section 550(a)(5) of the  
9 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
10 AHMED, with the intent to defraud, did knowingly and unlawfully  
11 prepare, make, and subscribe a material writing, with the intent  
12 to present and use it, and to allow it to be presented to SRS,  
13 in support of a false and fraudulent claim, and did aid and  
14 abet, and solicit another to do the same.

13 COUNT 65: On or about and between September 01, 2012 and  
14 December 22, 2012, in violation of Section 550(a)(5) of the  
15 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
16 AHMED, with the intent to defraud, did knowingly and unlawfully  
17 prepare, make, and subscribe a material writing, with the intent  
18 to present and use it, and to allow it to be presented to  
19 TRAVELERS INS., in support of a false and fraudulent claim, and  
20 did aid and abet, and solicit another to do the same.

19 COUNT 66: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED, with the intent to defraud, did knowingly and unlawfully  
23 prepare, make, and subscribe a material writing, with the intent  
24 to present and use it, and to allow it to be presented to CHUBB  
25 GROUP, in support of a false and fraudulent claim, and did aid  
26 and abet, and solicit another to do the same.

25 COUNT 67: On or about and between September 01, 2012 and  
26 December 22, 2012, in violation of Section 550(a)(5) of the  
27 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
28 AHMED, 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, in support of a false and fraudulent claim, and did  
aid and abet, and solicit another to do the same.

1 COUNT 68: On or about and between September 01, 2012 and  
2 December 22, 2012, in violation of Section 550(a)(5) of the  
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
4 AHMED, with the intent to defraud, did knowingly and unlawfully  
5 prepare, make, and subscribe a material writing, with the intent  
6 to present and use it, and to allow it to be presented to  
REPUBLIC INDEMNITY, in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

7 COUNT 69: On or about and between September 01, 2012 and  
8 December 22, 2012, in violation of Section 550(a)(5) of the  
9 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
10 AHMED, with the intent to defraud, did knowingly and unlawfully  
11 prepare, make, and subscribe a material writing, with the intent  
12 to present and use it, and to allow it to be presented to STATE  
FARM, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

13 COUNT 70: On or about and between September 01, 2012 and  
14 December 22, 2012, in violation of Section 550(a)(5) of the  
15 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
16 AHMED, with the intent to defraud, did knowingly and unlawfully  
17 prepare, make, and subscribe a material writing, with the intent  
18 to present and use it, and to allow it to be presented to  
CORVEL, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

19 COUNT 71: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED, with the intent to defraud, did knowingly and unlawfully  
23 prepare, make, and subscribe a material writing, with the intent  
24 to present and use it, and to allow it to be presented to  
FARMERS INS., in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

25 COUNT 72: On or about and between September 01, 2012 and  
26 December 22, 2012, in violation of Section 550(a)(5) of the  
27 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
28 AHMED, 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, and solicit another to do the same.

1 COUNT 73: On or about and between September 01, 2012 and  
2 December 22, 2012, in violation of Section 550(a)(5) of the  
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
4 AHMED, with the intent to defraud, did knowingly and unlawfully  
5 prepare, make, and subscribe a material writing, with the intent  
6 to present and use it, and to allow it to be presented to AIG/  
CHARTIS, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

7 COUNT 74: On or about and between September 01, 2012 and  
8 December 22, 2012, in violation of Section 550(a)(5) of the  
9 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
10 AHMED, with the intent to defraud, did knowingly and unlawfully  
11 prepare, make, and subscribe a material writing, with the intent  
12 to present and use it, and to allow it to be presented to STATE  
COMPENSATION INSURANCE FUND, in support of a false and  
fraudulent claim, and did aid and abet, and solicit another to  
do the same.

13 COUNT 75: On or about and between September 01, 2012 and  
14 December 22, 2012, in violation of Section 550(a)(5) of the  
15 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
16 AHMED, with the intent to defraud, did knowingly and unlawfully  
17 prepare, make, and subscribe a material writing, with the intent  
18 to present and use it, and to allow it to be presented to MARKEL  
FIRST COMP, in support of a false and fraudulent claim, and did  
aid and abet, and solicit another to do the same.

19 COUNT 76: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED, with the intent to defraud, did knowingly and unlawfully  
23 prepare, make, and subscribe a material writing, with the intent  
24 to present and use it, and to allow it to be presented to  
SEABRIGHT INS., in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

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1 COUNT 77: On or about and between September 01, 2012 and  
2 December 22, 2012, in violation of Section 550(a)(5) of the  
3 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
4 AHMED, with the intent to defraud, did knowingly and unlawfully  
5 prepare, make, and subscribe a material writing, with the intent  
6 to present and use it, and to allow it to be presented to CITY  
OF LOS ANGELES, in support of a false and fraudulent claim, and  
did aid and abet, and solicit another to do the same.

7 COUNT 78: On or about and between September 01, 2012 and  
8 December 22, 2012, in violation of Section 550(a)(5) of the  
9 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
10 AHMED, with the intent to defraud, did knowingly and unlawfully  
11 prepare, make, and subscribe a material writing, with the intent  
12 to present and use it, and to allow it to be presented to  
DISNEY, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

13 COUNT 79: On or about and between September 01, 2012 and  
14 December 22, 2012, in violation of Section 550(a)(5) of the  
15 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
16 AHMED, with the intent to defraud, did knowingly and unlawfully  
17 prepare, make, and subscribe a material writing, with the intent  
18 to present and use it, and to allow it to be presented to COUNTY  
OF SAN BERNARDINO, in support of a false and fraudulent claim,  
and did aid and abet, and solicit another to do the same.

19 COUNT 80: On or about and between September 01, 2012 and  
20 December 22, 2012, in violation of Section 550(a)(5) of the  
21 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
22 AHMED, with the intent to defraud, did knowingly and unlawfully  
23 prepare, make, and subscribe a material writing, with the intent  
24 to present and use it, and to allow it to be presented to  
MACY'S, in support of a false and fraudulent claim, and did aid  
and abet, and solicit another to do the same.

25 COUNT 81: On or about and between September 01, 2012 and  
26 December 22, 2012, in violation of Section 550(a)(5) of the  
27 Penal Code (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM  
28 AHMED, 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 VONS,  
in support of a false and fraudulent claim, and did aid and  
abet, and solicit another to do the same.

1 COUNT 82: On or about and between December 28, 2012 and  
2 December 23, 2015, in violation of Section 550(a)(8) of the  
3 Penal Code (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED and  
4 NORMA REYNA GARNER, with the intent to defraud ZENITH INSURANCE  
5 (Maricela B.), did knowingly and unlawfully present multiple  
6 claims for payment of the same health care benefit in an amount  
7 exceeding nine hundred fifty dollars (\$950), and did aid and  
8 abet, and solicit another to do the same.

7 COUNT 83: On or about November 19, 2015, in violation of Section  
8 550(a)(8) of the Penal Code (MEDICAL INSURANCE FRAUD), a FELONY,  
9 KAREEM AHMED and NORMA REYNA GARNER, with the intent to defraud  
10 ZENITH INSURANCE (Maria A.), did knowingly and unlawfully  
11 present multiple claims for payment of the same health care  
12 benefit in an amount exceeding nine hundred fifty dollars  
13 (\$950), and did aid and abet, and solicit another to do the  
14 same.

13 COUNT 84: On or about and between March 27, 2015 and March 31,  
14 2016, in violation of Section 550(a)(8) of the Penal Code  
15 (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED and NORMA  
16 REYNA GARNER, with the intent to defraud AMERICAN CLAIMS  
17 MANAGEMENT, did knowingly and unlawfully present multiple  
18 claims for payment of the same health care benefit in an amount  
19 exceeding nine hundred fifty dollars (\$950), and did aid and  
20 abet, and solicit another to do the same.

19 COUNT 85: On or about and between June 11, 2015 and March 31,  
20 2016, in violation of Section 550(a)(8) of the Penal Code  
21 (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED, with the  
22 intent to defraud SEDGWICK INS., did knowingly and unlawfully  
23 present multiple claims for payment of the same health care  
24 benefit in an amount exceeding nine hundred fifty dollars  
25 (\$950), and did aid and abet, and solicit another to do the  
26 same.

25 COUNT 86: On or about and between June 17, 2014 and April 16,  
26 2016, in violation of Section 550(a)(8) of the Penal Code  
27 (MEDICAL INSURANCE FRAUD), a FELONY, KAREEM AHMED, with the  
28 intent to defraud BERKSHIRE HATHAWAY INS. CO., did knowingly and  
unlawfully present multiple claims for payment of the same  
health care benefit in an amount exceeding nine hundred fifty  
dollars (\$950), and did aid and abet, and solicit another to do  
the same.

1 COUNT 87: On or about and between June 27, 2014 and April 16,  
2 2016, in violation of Section 550(a)(8) of the Penal Code  
3 (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, KAREEM  
4 AHMED did unlawfully conspire with UNKNOWN CO-CONSPIRATORS, with  
5 the intent to defraud WORKERS COMPENSATION INSURANCE CARRIERS  
6 and present multiple claims for payment of the same health care  
7 benefit in an amount exceeding nine hundred fifty dollars  
8 (\$950). It is further alleged that pursuant to and for the  
9 purpose of carrying out the objects and purposes of the  
10 conspiracy, one and more of the conspirators committed the  
11 following overt acts:

12  
13 OVERT ACT 1

14 Kareem Ahmed generated and submitted healthcare claims to  
15 workers compensation carriers for transdermal compound creams  
16 procured by means of payment of kickbacks to physicians.  
17

18 OVERT ACT 2

19 Ahmed paid Curt's Compounding Pharmacy in Orange County a flat  
20 fee of less than \$95 for each "remaining month supply" of  
21 transdermal compound cream manufactured and shipped to a patient  
22 and submitted a substantially inflated claim for payment to  
23 workers compensation carriers in excess of \$1100 for each cream.

24 OVERT ACT 3

25 At Ahmed's instructions, both Michael Rudolph and Curtis Hague  
26 did not affix the price for manufacturing each cream on the  
27 label and paperwork accompanying the transdermal compound creams  
28 shipped to each patient in order to hide the cost of  
manufacturing the creams from the workers compensation carriers.

OVERT ACT 4

Ahmed's company, Pharmafinance LLC, submitted claims for payment  
at highly inflated prices to workers compensation carriers for  
the transdermal compound creams manufactured and shipped to  
patients by Curt's Compounding Pharmacy in Orange County and  
Healthcare Pharmacy in Orange County.

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OVERT ACT 5

Ahmed's Company, Healthcare Finance Management, submitted claims for payment to workers compensation carriers for transdermal compound creams distributed by physicians who received kickbacks from Ahmed.

OVERT ACT 6

Ahmed instructed his staff, including Norma Garner, his collection manager, to file liens at the workers compensation appeals board for millions of dollars in false claims which were submitted to workers compensation carriers.

OVERT ACT 7

Between 6/27/14 and 12/31/15 Ahmed paid \$800,000 in lien activation or filing fees to collect on over \$58 millions dollars in false claims generated based on kickbacks to medical providers.

OVERT ACT 8

Ahmed employed the Blue Law Group, and Michael Blue, to aggressively collect on these false claims.

OVERT ACT 9

Ahmed instructed Norma Garner his collection manager to employ delay tactics and hide the terms of his kickback agreements with the pharmacists and the physicians because he knew that the claims would be deemed false and not paid by the workers compensation carriers if the carriers discovered that the claims were procured by using a kickback scheme.

OVERT ACT 10

Despite a Court order by the workers compensation appeals board Judge, Norma Garner and Michael Blue, at Ahmed's direction, continued to hide the terms of Ahmed's agreements with various physicians and pharmacists on 3/10/16 and 4/14/16 in Case # ADJ2262813, Applicant: Oscar Arreola in order to continue to collect on these false claims.

OTHER ALLEGATION(S)

As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 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 and 87, it is further alleged pursuant to Penal Code section 803(b) (STATUTE OF LIMITATIONS TOLLED), that a previous prosecution of defendants KAREEM AHMED, ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH for the same conduct commenced within the meaning of Section 804(a), namely, an indictment or information was filed, and was pending in SUPERIOR COURT, County of ORANGE, State of California, from JUNE 18, 2014 to JUNE 3, 2016.

ENHANCEMENT(S)

It is further alleged pursuant to Penal Code section 186.11(a) (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as to counts 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 and 87, defendants KAREEM AHMED, ANDREW ROBERT JARMINSKI, MICHAEL RUDOLPH and NORMA REYNA GARNER engaged in a pattern of related fraudulent felony conduct involving the taking of more than five hundred thousand dollars (\$500,000).

As to Count(s) 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 and 87, it is further alleged pursuant to Penal Code section 12022.6(a)(4) (PROPERTY DAMAGE OVER \$3,200,000), that KAREEM AHMED, ANDREW ROBERT JARMINSKI, MICHAEL RUDOLPH and NORMA REYNA GARNER 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.

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1 As to Count(s) 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17,  
2 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33,  
3 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44 and 45, it is further  
4 alleged pursuant to Penal Code section 12022.6(a)(3) (PROPERTY  
5 DAMAGE OVER \$1,300,000), that ANDREW ROBERT JARMINSKI  
6 intentionally took, damaged, and destroyed property valued in  
7 excess of one million three hundred thousand dollars  
8 (\$1,300,000) during the commission and attempted commission of  
9 the above offense.

10 As to Count(s) 85, 86 and 87, it is further alleged pursuant to  
11 Penal Code section 12022.1(b) (CRIME - BAIL - CRIME), that at  
12 the time of the commission of the above offense, defendant  
13 KAREEM AHMED was released from custody on bail and on the  
14 defendant's own recognizance on a primary felony, in case  
15 14ZF0335.

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

18 Dated 05-20-2016 at Orange County, California.  
19 KS/AC 16F01360

20 TONY RACKAUCKAS, DISTRICT ATTORNEY

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

23 RESTITUTION CLAIMED

24 [ ] None  
25 [ ] \$ \_\_\_\_\_  
26 [ X ] To be determined

27 **NOTICES:**

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



**State of California  
Secretary of State**

**S**

**Statement of Information**

119

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

**IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM**

**FILED**  
Secretary of State  
State of California

**FEB 16 2016**

1. CORPORATE NAME

TRISTAR MEDICAL GROUP, PROFESSIONAL CORP.

2. CALIFORNIA CORPORATE NUMBER

C2401022

NF

This Space for Filing Use Only

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

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

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

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

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
999 NORTH TUSTIN AVE #201	SANTA ANA	CA	92705
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
999 NORTH TUSTIN AVE #201	SANTA ANA	CA	92705
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE

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

7. CHIEF EXECUTIVE OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
MICHAEL EDWARD BARRI	999 NORTH TUSTIN AVE #201	SANTA ANA	CA	92705
8. SECRETARY	ADDRESS	CITY	STATE	ZIP CODE
JEFFREY DAVID GROSS	999 NORTH TUSTIN AVE #201	SANTA ANA	CA	92705
9. CHIEF FINANCIAL OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
MICHAEL EDWARD BARRI	999 NORTH TUSTIN AVE #201	SANTA ANA	CA	92705

**Names and Complete Addresses of All Directors, Including Directors Who are Also Officers** (The corporation must have at least one director. Attach additional pages, if necessary.)

10. NAME	ADDRESS	CITY	STATE	ZIP CODE
MICHAEL EDWARD BARRI	999 NORTH TUSTIN AVE #201	SANTA ANA	CA	92705
11. NAME	ADDRESS	CITY	STATE	ZIP CODE
JEFFREY DAVID GROSS	999 NORTH TUSTIN AVE #201	SANTA ANA	CA	92705
12. NAME	ADDRESS	CITY	STATE	ZIP CODE

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

**Agent for Service of Process** If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS  
MICHAEL EDWARD BARRI

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE  
999 NORTH TUSTIN AVE #201 SANTA ANA CA 92705

**Type of Business**

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

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

02/11/2016 KELLY ERIN TICE PARALEGAL  
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE

*Kelly Erin Tice*  
SIGNATURE