

INDEX

Villapania Chiropractic, a California Corporation & Robert Julian Villapania

Exhibit #	Document
1	People of the State of California v. Robert Julian Villapania (Case no. 16CF1360)
2	CA Secretary of State: Certificate of Dissolution, 12/16/2003

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

05/20/2016
11:21 AM

ALAN CARLSON, Clerk of the Court
16CF1360

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) **FELONY COMPLAINT**
7) **REFILED 14ZF0334**
8 Plaintiff,)
9)
10 vs.) **No.**
11 ROBERT JULIAN VILLAPANIA DC 01/08/59) **OCDA WC11120004**
N5092039) **OCDA WC14070007**
12)
13 Defendant(s))

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

16 COUNT 1: On or about and between September 09, 2009 and August
17 08, 2012, in violation of Section 550(a)(6) of the Penal Code
18 (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, ROBERT
19 JULIAN VILLAPANIA DC did unlawfully conspire with KAREEM AHMED,
20 AND OTHER UNKNOWN INDIVIDUALS, with the intent to defraud, to
21 make a false and fraudulent claim to WORKERS COMPENSATION
22 CARRIERS for payment of a health care benefit in an amount
23 exceeding nine hundred fifty dollars (\$950). It is further
alleged that pursuant to and for the purpose of carrying out the
objects and purposes of the conspiracy, one and more of the
conspirators committed the following overt acts:

24 OVERT ACT 1

25 Robert Villapania, D.C. formed a professional corporation named
26 Regional Associates Medical Group, and named Dr. Suchandra
27 Turner, M.D. the Chief Executive Officer in 2009.

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OVERT ACT 2

On September 9, 2009, on behalf of Regional Associates Medical Group, Dr. Suchandra Turner M.D. entered into an agreement with Kareem Ahmed and his companies: Physicians Funding Solutions LLC, to distribute transdermal compound creams to workers compensation patients treated at Regional Associates Medical Group.

OVERT ACT 3

Under the guise of selling accounts receivables to Physicians Funding Solutions and Healthcare Finance Regional Associates Medical Group received kickbacks to prescribe transdermal compound creams manufactured by Curt's Compounding Pharmacy in Orange County California.

OVERT ACT 4

Kareem Ahmed and his company Physician's Funding Solutions LLC agreed to pay Regional Associates Medical Group \$50 (Fifty dollars) for each compound cream the medical staff distributed and prescribed to workers compensation patients treated at the clinic.

OVERT ACT 5

At Ahmed direction, Curt's Compounding Pharmacy provided the 3-day supply of the transdermal creams to the physicians who entered into a contract with Physicians Funding Solutions LLC so that the medical staff could hand the creams to the workers compensation patients and justify Regional Associates Medical Group's ability to bill insurance carriers and generate accounts receivables.

OVERT ACT 6

Physicians Funding Solutions LLC would only pay Regional Associates Medical Group for distribution of the transdermal compound creams manufactured by Curt's Compounding Pharmacy if the medical staff also prescribed a larger size of the transdermal creams to each patient which would then be directly shipped from Curt's Compounding Pharmacy in Orange County to each workers compensation patient.

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OVERT ACT 7

Kareem Ahmed's Company, Physicians' Funding Solutions, paid Regional Associate Medical Group \$50 (Fifty dollars) for each compound cream the medical staff distributed and prescribed to the workers compensation patients treated at the Clinic.

OVERT ACT 8

Robert Villapania, a chiropractor, instructed the medical staff to distribute and prescribe transdermal compound creams to workers compensation patients at his clinics regardless of medical necessity and in fact, instructed the medical assistance to distribute and prescribe transdermal compound creams under Dr. Brent Pratley, M.D.'s name without his knowledge.

OVERT ACT 9

Between 1/7/10 and 8/8/12, Kareem Ahmed paid Robert Villapania and Regional Associates Medical Group \$1,089,730 in kickbacks for distributing and prescribing compound transdermal creams.

OVERT ACT 10

Physicians Funding Solutions issued at least one payment to Regional Associates Medical group, on 8/8/12 in the amount of \$550.

OVERT ACT 11

At Robert Villapania's direction, Regional Associate Medical Group distributed thousands of transdermal compound creams manufactured by Curt's Compounding Pharmacy in Orange County to the workers compensation patients treated at his clinics regardless of medical necessity.

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

11 COUNT 3: On or about and between June 17, 2010 and August 08,
12 2012, in violation of Section 550(a)(5) of the Penal Code
13 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
14 VILLAPANIA DC, with the intent to defraud, did knowingly and
15 unlawfully prepare, make, and subscribe a material writing, with
16 the intent to present and use it, and to allow it to be
17 presented to STATE COMPENSATION INSURANCE FUND, in support of a
18 false and fraudulent claim, and did aid and abet, and solicit
19 another to do the same.

20 COUNT 4: On or about and between June 17, 2010 and August 08,
21 2012, in violation of Section 550(a)(5) of the Penal Code
22 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
23 VILLAPANIA DC, with the intent to defraud, did knowingly and
24 unlawfully prepare, make, and subscribe a material writing, with
25 the intent to present and use it, and to allow it to be
26 presented to TRAVELERS INSURANCE, in support of a false and
27 fraudulent claim, and did aid and abet, and solicit another to
28 do the same.

29 COUNT 5: On or about and between June 17, 2010 and August 08,
30 2012, in violation of Section 550(a)(5) of the Penal Code
31 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
32 VILLAPANIA DC, with the intent to defraud, did knowingly and
33 unlawfully prepare, make, and subscribe a material writing, with
34 the intent to present and use it, and to allow it to be
35 presented to SEDGWICK, in support of a false and fraudulent
36 claim, and did aid and abet, and solicit another to do the same.

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1 COUNT 6: On or about and between June 17, 2010 and August 08,
2 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
4 VILLAPANIA DC, 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
7 presented to LIBERTY MUTUAL 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 7: On or about and between June 17, 2010 and August 08,
11 2012, in violation of Section 550(a)(5) of the Penal Code
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
13 VILLAPANIA DC, with the intent to defraud, did knowingly and
14 unlawfully prepare, make, and subscribe a material writing, with
15 the intent to present and use it, and to allow it to be
16 presented to MARKEL FIRST COMP INS., in support of a false and
17 fraudulent claim, and did aid and abet, and solicit another to
18 do the same.

19 COUNT 8: 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, ROBERT JULIAN
22 VILLAPANIA DC, with the intent to defraud, did knowingly and
23 unlawfully prepare, make, and subscribe a material writing, with
24 the intent to present and use it, and to allow it to be
25 presented to CHUBB GROUP, in support of a false and fraudulent
26 claim, and did aid and abet, and solicit another to do the same.

27 COUNT 9: On or about and between June 17, 2010 and August 08,
28 2012, in violation of Section 550(a)(5) of the Penal Code
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
VILLAPANIA DC, 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, and solicit another to do the same.

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1 COUNT 10: On or about and between June 17, 2010 and August 08,
2 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
4 VILLAPANIA DC, 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
7 presented to GALLAGHER BASSETT, in support of a false and
8 fraudulent claim, and did aid and abet, and solicit another to
9 do the same.

10 COUNT 11: On or about and between June 17, 2010 and August 08,
11 2012, in violation of Section 550(a)(5) of the Penal Code
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
13 VILLAPANIA DC, with the intent to defraud, did knowingly and
14 unlawfully prepare, make, and subscribe a material writing, with
15 the intent to present and use it, and to allow it to be
16 presented to REPUBLIC INDEMNITY, in support of a false and
17 fraudulent claim, and did aid and abet, and solicit another to
18 do the same.

19 COUNT 12: On or about and between June 17, 2010 and August 08,
20 2012, in violation of Section 550(a)(5) of the Penal Code
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
22 VILLAPANIA DC, with the intent to defraud, did knowingly and
23 unlawfully prepare, make, and subscribe a material writing, with
24 the intent to present and use it, and to allow it to be
25 presented to ESIS, in support of a false and fraudulent claim,
26 and did aid and abet, and solicit another to do the same.

27 COUNT 13: On or about and between June 17, 2010 and August 08,
28 2012, in violation of Section 550(a)(5) of the Penal Code
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
VILLAPANIA DC, 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 14: On or about and between June 17, 2010 and August 08,
2 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
4 VILLAPANIA DC, 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 TRISTAR, in support of a false and fraudulent
claim, and did aid and abet, and solicit another to do the same.

7 COUNT 15: On or about and between June 17, 2010 and August 08,
8 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
10 VILLAPANIA DC, 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 SEABRIGHT INS., in support of a false and
fraudulent claim, and did aid and abet, and solicit another to
do the same.

13 COUNT 16: On or about and between June 17, 2010 and August 08,
14 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
16 VILLAPANIA DC, with the intent to defraud, did knowingly and
17 unlawfully prepare, make, and subscribe a material writing, with
18 the intent to present and use it, and to allow it to be
presented to C.N.A., in support of a false and fraudulent claim,
and did aid and abet, and solicit another to do the same.

19 COUNT 17: On or about and between June 17, 2010 and August 08,
20 2012, in violation of Section 550(a)(5) of the Penal Code
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
22 VILLAPANIA DC, with the intent to defraud, did knowingly and
23 unlawfully prepare, make, and subscribe a material writing, with
24 the intent to present and use it, and to allow it to be
25 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 18: On or about and between June 17, 2010 and December
2 31, 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
4 VILLAPANIA DC, 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
7 presented to EMPLOYERS 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 19: On or about and between June 17, 2010 and August 08,
11 2012, in violation of Section 550(a)(5) of the Penal Code
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
13 VILLAPANIA DC, with the intent to defraud, did knowingly and
14 unlawfully prepare, make, and subscribe a material writing, with
15 the intent to present and use it, and to allow it to be
16 presented to ALASKA NATIONAL INS., in support of a false and
17 fraudulent claim, and did aid and abet, and solicit another to
18 do the same.

19 COUNT 20: On or about and between June 17, 2010 and August 08,
20 2012, in violation of Section 550(a)(5) of the Penal Code
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
22 VILLAPANIA DC, with the intent to defraud, did knowingly and
23 unlawfully prepare, make, and subscribe a material writing, with
24 the intent to present and use it, and to allow it to be
25 presented to SRS, in support of a false and fraudulent claim,
26 and did aid and abet, and solicit another to do the same.

27 COUNT 21: On or about and between June 17, 2010 and August 08,
28 2012, in violation of Section 550(a)(5) of the Penal Code
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
VILLAPANIA DC, 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.

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1 COUNT 22: On or about and between June 17, 2010 and August 08,
2 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
4 VILLAPANIA DC, 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 COMPWEST INS., in support of a false and fraudulent
claim, and did aid and abet, and solicit another to do the same.

7 COUNT 23: On or about and between June 17, 2010 and August 08,
8 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
10 VILLAPANIA DC, 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 FIREMAN'S FUND, in support of a false and fraudulent
claim, and did aid and abet, and solicit another to
do the same.

13 COUNT 24: On or about and between June 17, 2010 and August 08,
14 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
16 VILLAPANIA DC, with the intent to defraud, did knowingly and
17 unlawfully prepare, make, and subscribe a material writing, with
18 the intent 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.

19 COUNT 25: On or about and between June 17, 2010 and August 08,
20 2012, in violation of Section 550(a)(5) of the Penal Code
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
22 VILLAPANIA DC, with the intent to defraud, did knowingly and
23 unlawfully prepare, make, and subscribe a material writing, with
24 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.

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1 COUNT 26: On or about and between June 17, 2010 and August 08,
2 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
4 VILLAPANIA DC, 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
7 presented to MARRIOTT CLAIMS, in support of a false and
8 fraudulent claim, and did aid and abet, and solicit another to
9 do the same.

10 COUNT 27: On or about and between June 17, 2010 and August 08,
11 2012, in violation of Section 550(a)(5) of the Penal Code
12 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
13 VILLAPANIA DC, with the intent to defraud, did knowingly and
14 unlawfully prepare, make, and subscribe a material writing, with
15 the intent to present and use it, and to allow it to be
16 presented to CITY OF SANTA ANA, in support of a false and
17 fraudulent claim, and did aid and abet, and solicit another to
18 do the same.

19 COUNT 28: On or about and between June 17, 2010 and August 08,
20 2012, in violation of Section 550(a)(5) of the Penal Code
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
22 VILLAPANIA DC, with the intent to defraud, did knowingly and
23 unlawfully prepare, make, and subscribe a material writing, with
24 the intent to present and use it, and to allow it to be
25 presented to COUNTY OF RIBERSIDE, in support of a false and
26 fraudulent claim, and did aid and abet, and solicit another to
27 do the same.

28 COUNT 29: On or about and between June 17, 2010 and August 08,
2012, in violation of Section 550(a)(5) of the Penal Code
(INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
VILLAPANIA DC, 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 DISNEY, 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 30: On or about and between June 17, 2010 and August 08,
2 2012, in violation of Section 550(a)(5) of the Penal Code
3 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
4 VILLAPANIA DC, 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 FOSTER FARMS, in support of a false and fraudulent
claim, and did aid and abet, and solicit another to do the same.

7 COUNT 31: On or about and between June 17, 2010 and August 08,
8 2012, in violation of Section 550(a)(5) of the Penal Code
9 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
10 VILLAPANIA DC, 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 KAISER, in support of a false and fraudulent claim,
and did aid and abet, and solicit another to do the same.

13 COUNT 32: On or about and between June 17, 2010 and August 08,
14 2012, in violation of Section 550(a)(5) of the Penal Code
15 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
16 VILLAPANIA DC, with the intent to defraud, did knowingly and
17 unlawfully prepare, make, and subscribe a material writing, with
18 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.

19 COUNT 33: On or about and between June 17, 2010 and August 08,
20 2012, in violation of Section 550(a)(5) of the Penal Code
21 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, ROBERT JULIAN
22 VILLAPANIA DC, with the intent to defraud, did knowingly and
23 unlawfully prepare, make, and subscribe a material writing, with
24 the intent to present and use it, and to allow it to be
25 presented to CITY OF BURBANK, in support of a false and
fraudulent claim, and did aid and abet, and solicit another to
do the same.

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1 COUNT 34: On or about and between June 17, 2011 and August 08,
2 2012, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, ROBERT JULIAN VILLAPANIA DC did
4 unlawfully solicit, accept, and refer business to and from
5 PHYSICIANS FUNDING SOLUTIONS LLC, with the knowledge that, and
6 with reckless disregard for whether PHYSICIANS FUNDING SOLUTIONS
7 LLC intended to violate Penal Code section 550 and Insurance
8 Code section 1871.4.

7 OTHER ALLEGATION(S)

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

15 ENHANCEMENT(S)

16 It is further alleged pursuant to Penal Code section 186.11(a)
17 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
18 to counts 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16,
19 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32,
20 33 and 34, defendant ROBERT JULIAN VILLAPANIA DC engaged in a
21 pattern of related fraudulent felony conduct involving the
22 taking of more than five hundred thousand dollars (\$500,000).

23 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,
24 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30,
25 31, 32, 33 and 34, it is further alleged pursuant to Penal Code
26 section 12022.6(a)(2) (PROPERTY LOSS OVER \$200,000), that ROBERT
27 JULIAN VILLAPANIA DC intentionally took, damaged, and destroyed
28 property valued in excess of two hundred thousand dollars
(\$200,000) during the commission and attempted commission of the
above offense.

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

Dated 05-20-2016 at Orange County, California.
KS/AC 16F01368

TONY RACKAUCKAS, DISTRICT ATTORNEY

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

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

NOTICES:

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

00727590

2375238

See Secretary of State's
records for exact entity name.

FILED

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

DEC 16 2003

Kevin Shelley
KEVIN SHELLEY, Secretary of State

CERTIFICATE OF DISSOLUTION

The undersigned certify that:

They constitute a majority of the directors now in office of VILLAPANIA CHIROPRACTIC, a California Corporation.

The corporation has been completely wound up.

The corporation's known debts and liabilities have been paid as far as its assets permitted.

The known assets have been distributed to the persons entitled thereto.

A person or corporation assumes the tax liability, if any, of the dissolving corporation as security for the issuance of a Tax Clearance Certificate from the Franchise Tax Board and is responsible for additional corporate taxes, if any that are assessed and that become due after the date of the assumption of the tax liability.

The election to dissolve was made by the vote of all the outstanding shares.

The corporation is dissolved.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of our own knowledge.

Date: 12/08/03

Robert Villapania - Director
Robert Villapania, Director