

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
felony, or non-felonious unlawful act, to wit: a violation of
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
(\$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:

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
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 HARTFORD 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
29 31, 2012, in violation of Section 550(a)(5) of the Penal Code
30 (INSURANCE FRAUD - WRITTEN CLAIM), a FELONY, KAREEM AHMED,
31 ANDREW ROBERT JARMINSKI and MICHAEL RUDOLPH, with the intent to
32 defraud, did knowingly and unlawfully prepare, make, and
33 subscribe a material writing, with the intent to present and use
34 it, and to allow it to be presented to FIREMAN'S FUND INS., in
35 support of a false and fraudulent claim, and did aid and abet,
36 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
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.

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8 COUNT 20: 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 AIG/CHARTIS, in support
of a false and fraudulent claim, and did aid and abet, and
solicit another to do the same.

14 COUNT 21: 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 YORK, in support of a
false and fraudulent claim, and did aid and abet, and solicit
another to do the same.

21 COUNT 22: 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 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
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.

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8 COUNT 24: 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 MARKEL FIRST COMP INS.,
in support of a false and fraudulent claim, and did aid and
abet, and solicit another to do the same.

14 COUNT 25: 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 ICW, in support of a
false and fraudulent claim, and did aid and abet, and solicit
another to do the same.

21 COUNT 26: 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 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
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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8 COUNT 28: 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 STATE FARM, in support of
a false and fraudulent claim, and did aid and abet, and solicit
another to do the same.

14 COUNT 29: 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 EMPLOYERS INS., in
support of a false and fraudulent claim, and did aid and abet,
and solicit another to do the same.

21 COUNT 30: 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 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
7 it, and to allow it to be presented to COUNTY OF RIVERSIDE, in
8 support of a false and fraudulent claim, and did aid and abet,
9 and solicit another to do the same.

10 COUNT 32: 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 VONS, in support of a
17 false and fraudulent claim, and did aid and abet, and solicit
18 another to do the same.

19 COUNT 33: 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 COUNTY OF SAN BERNARDINO,
26 in support of a false and fraudulent claim, and did aid and
27 abet, and solicit another to do the same.

28 COUNT 34: 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 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
7 it, and to allow it to be presented to CITY OF TORRANCE, in
8 support of a false and fraudulent claim, and did aid and abet,
9 and solicit another to do the same.

10 COUNT 40: 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 RIVERSIDE, in
17 support of a false and fraudulent claim, and did aid and abet,
18 and solicit another to do the same.

19 COUNT 41: 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 CITY OF HUNTINGTON BEACH,
26 in support of a false and fraudulent claim, and did aid and
27 abet, and solicit another to do the same.

28 COUNT 42: 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 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.