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6

7 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF LOS ANGELES, SOUTHEAST DISTRICT**

9 PEOPLE OF THE STATE OF CALIFORNIA,
10

11 Plaintiff,

Case No.:

FELONY COMPLAINT

12 v.

13 **(D1) ENRIQUE VALER,**
AKA: Ruhlman Pebe
AKA: Raul Valer
14 **AKA: Paul Valer**
15 **AKA: Victor Salinas**

16 **(D2) JULIO JAVIER ROMO,**
AKA: Gabriel Humberto Rios
17 **AKA: Jose Jaime Garcia**

18 **(D3) ZUBIN PLASENCIA**
AKA: Zubin Pugliese

19 **(D4) GABRIEL HUMBERTO RIOS,**

20 **(D5) MONICA MAXIMILIANO,**
AKA: Monica Iriarte Maximiliano
21 **AKA: Monica Plasencia**
22 **AKA: Monica Andrea Maximiliano**

23 **(D6) JUAN CARLOS AVILA,**
AKA: Juan Carlos Avila Gallo

24 **(D7) TERESA MENDIVIL, and**

25 **(D8) CARMEN REVELLI**
AKA: Carmen Diane Del Toro
26 **AKA: Carmen Valer**
27 **AKA: Carmen Valer De Revelli**

28 Defendants,

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2 **OVERT ACTS**

3 **Daval Dental**

- 4 1. On or about November 14, 1997, **Enrique Valer** and John Davila asked Demetrio
5 StaAna, a licensed dentist, to work for them at their medical and dental clinic located at
6 3512 E Florence #102, Huntington Park. CA 90255.
- 7 2. On or about November 14, 1997, John Davila and **Enrique Valer** told Demetrio StaAna,
8 DDS, that “Dr. Yoram Isaacson” was their “partner”, and all dental services to Medi-Cal
9 patients were being billed under Dr. Isaacson’s Medi-Cal provider number.
- 10 3. On or about December 30, 1997, John Davila and **Enrique Valer** told Demetrio StaAna,
11 DDS, there was a problem with Dr. Isaacson’s Medi-Cal provider number and they
12 wanted StaAna to get his own Medi-Cal provider number.
- 13 4. On or about December 30, 1997, **Yoram Isaacson, DDS** told Demetrio StaAna, DDS,
14 that if he obtained his own Medi-Cal provider number, StaAna could review all claims
15 billed under that Medi-Cal provider number before the claims were mailed.
- 16 5. On or about February 2, 1998, when John Davila and **Enrique Valer** asked Demetrio
17 StaAna, DDS, to get his own Medi-Cal provider number.
- 18 6. On or about February 2, 1998, when John Davila and **Enrique Valer** told Demetrio
19 StaAna, DDS, that StaAna’s Medi-Cal provider number would only be used to bill for
20 services rendered by StaAna, and that other dentists would obtain their own Medi-Cal
21 provider numbers.
- 22 7. On or about February 2, 1998, John Davila told Demetrio StaAna, DDS, that services
23 provided by unlicensed dentists would not be billed under StaAna’s Medi-Cal provider
24 number.
- 25 8. On or about and between February 2, 1998 and March 31, 1998, John Davila and
26 **Enrique Valer** used (or caused to be used) Demetrio StaAna, DDS’s Medi-Cal provider
27 number to bill the Medi-Cal Dental Program for services which had not been rendered by
28 StaAna.

- 1 9. On or about and between November 1, 1997 and April 5, 1998, while masquerading as a
2 dentist, **Teresa Mendivil** provided dental to care to a patient at Valer’s medical/dental
3 clinic located at 3512 Florence Avenue, Suite 102-103, Huntington Park, CA.
- 4 10. On or about and between January 1, 1999, and July 28, 1999, after John Davila passed
5 away, **Enrique Valer** entered into a partnership with **Javier Romo**.
- 6 11. On or about January 1, 1999, **Enrique Valer** signed an Administrative Service Contract
7 between American Advertising and New Century using the alias of “Ruhlman Pebe”.

8 **Santa Rosa Dental**

- 9 12. On or about July 28, 1999, **Javier Romo** signed a lease for office space located at 11874
10 Rosecrans in Norwalk and stated he intended to open a dental clinic at that location.
- 11 13. On or about September 1, 1999, **Javier Romo** offered to pay Steven Y. Hou, DDS a
12 salary of \$300-\$400 per day for the mere use of Dr. Hou’s name, personal information
13 and Medi-Cal provider number.
- 14 14. On or about September 1, 1999, when **Javier Romo** offered to pay Steven Y. Hou, DDS
15 a daily salary, **Romo** told Dr. Hou he would not have “to show up at work or do
16 anything” to earn the offered salary.
- 17 15. On or about September 1, 1999, when **Javier Romo** offered to pay Steven Y. Hou, DDS
18 a daily salary, **Romo** told Dr. Hou that Dr. Hou would be named as the owner of the
19 clinic, but that Romo's management company (New Century Management) and
20 advertising company (American Adverting) would run the clinic.
- 21 16. On or about and between September 1, 1999, and October 31, 1999, after Steven Y. Hou,
22 DDS told Romo that Hou was not interested in being a “mere figurehead” of Santa Rosa
23 Dental Group, and was only interested in actually buying Santa Rosa Dental Group,
24 **Javier Romo** offered to sell Dr. Hou the clinic if Dr. Hou agreed to have Romo’s
25 companies (New Century Management and American Advertising) manage the clinic.

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- 1 17. On or about and between September 1, 1999, and October 31, 1999, after offering to sell
2 Santa Rosa Dental Group to Steven Y. Hou, DDS, **Javier Romo** told Dr. Hou he would
3 only have to “pay” kickbacks to American Advertising for any patients they brought to
4 the clinic.
- 5 18. On or about September 21, 1999, **Javier Romo** interviewed Simmona Kiss, DDS, for a
6 position as a dentist at Santa Rosa Dental Group.
- 7 19. On or about September 21, 1999, **Javier Romo** asked Simmona Kiss, DDS, to sign an
8 application to obtain a Medi-Cal provider number for Santa Rosa Dental Group.
- 9 20. On or about October 1, 1999, **Javier Romo** hired Simmona Kiss, DDS, as a dentist at
10 Santa Rosa Dental Group.
- 11 21. On or about and between September 21, 1999, and October 15, 1999, **Javier Romo** asked
12 Simmona Kiss, DDS, to sign an Independent Contractor Agreement.
- 13 22. On or about and between October 1, 1999, and October 31, 1999, **Javier Romo** asked
14 Steven Y. Hou, DDS to put his name on a business license application doing business as
15 Santa Rosa Dental Group.
- 16 23. On or about and between October 1, 1999, and October 31, 1999, **Javier Romo** asked
17 Steven Y. Hou, DDS to apply to Medi-Cal for a provider number.
- 18 24. On or about October 7, 1999, an unknown coconspirator used the identifying information
19 for Simmona Kiss, DDS, to establish an credit account for the purchase of dental supplies
20 from Pearson Dental Supply Company.
- 21 25. On or about November 10, 1999, **Javier Romo** asked Simmona Kiss, DDS, to fill out an
22 application for a fictitious name permit for Santa Rosa Dental Group.
- 23 26. On or about November 10, 1999, when asking Simmona Kiss, DDS, to fill out a fictitious
24 name permit, **Javier Romo** told Dr. Kiss to put Steven Y. Hou, DDS’ name on the
25 application, in addition to her own because they needed “to make a group”.

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- 1 27. On or about November 23, 1999, **Javier Romo** asked Steven Y. Hou, DDS to draft a
2 letter on behalf of Simmona Kiss, DDS, stating that she had been employed at Santa Rosa
3 Dental since October 1, 1999 with a salary of \$300 per day.
- 4 28. On or about and between September 1, 1999, and November 30, 1999, on one or more
5 occasions, **Enrique Valer** attended meetings between Javier Romo and Steven Y. Hou,
6 DDS, where Valer represented himself to be Romo’s business partner.
- 7 29. On or about and between September 1, 1999, and December 7, 1999, **Enrique Valer** and
8 **Javier Romo** asked Steven Y. Hou, DDS to sign a Wells Fargo signature card so that
9 Valer and Romo could open a bank account for Santa Rosa Dental Group.
- 10 30. On or about and between October 1, 1999, and December 2, 1999, when Simmona Kiss,
11 DDS, asked **Javier Romo** what she should say to state officials or law enforcement if
12 they came to look at the charts, Javier said “just tell them that they were taken to billing.”
- 13 31. On or about and between November 22, 1999, and December 31, 1999, unknown
14 coconspirators used the Medi-Cal Provider number issued to Simmona Kiss, DDS, to
15 submit one or more claims to Denti-Cal requesting payment for radiographs (x-rays)
16 which were never taken.
- 17 32. On or about January 2, 2000, **Javier Romo** hired April Chavez to work at Santa Rosa
18 Dental Clinic to answer telephones while the clinic was in the process of being opened.
- 19 33. On or about and between January 2, 2000 and January 31, 2000, on one or more
20 occasions, **Javiero Romo** asked April Chavez to cash some checks written from a
21 Bank of America Account for Santa Rosa Dental Group, because the bank would not cash
22 them for Romo.
- 23 34. On or about and between January 2, 2000 and January 31, 2000, on one or more
24 occasions, **Javier Romo** drove April Chavez to a Bank of America in Norwalk California
25 where she cashed checks made out to herself and then give the money to Romo.

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1 35. On or about and between January 2, 2000 and January 31, 2000, on one or more
2 occasions, **Javier Romo** handed April Chavez a blank check from Santa Rosa Dental
3 Group's account at Bank of America and asked April Chavez to write a check out to
4 herself, cash it and give Romo the money.

5 **Millennium Dental**

6 36. On or about and between July 28, 1999 and February 14, 2000, **Javier Romo** and **Zubin**
7 **Plasencia** initiated negotiations for the joint ownership of a dental clinic to be located at
8 11874 Rosecrans Avenue in Norwalk.

9 37. On or about January 12, 2000, **Zubin Plasencia** interviewed Michelle Tran, DDS at
10 Plasencia's home located at 2232 W. Channing, West Covina, CA, to work at a dental
11 clinic that he would soon open at 11874 Rosecrans Avenue in Norwalk., which was
12 ultimately named Millennium Dental.

13 38. On or about January 12, 2000, **Zubin Plasencia** obtained a copy of Michelle Tran's
14 dental license and all her personal identifying information.

15 39. On or about January 12, 2000, **Zubin Plasencia** told Michelle Tran, DDS, that she would
16 be the only dentist working at the clinic on Rosecrans Avenue and she would be required
17 to obtain a Medi-Cal Provider number.

18 40. On or about January 12, 2000, **Zubin Plasencia** and unnamed coconspirators filed and
19 caused to be filed with the City of Norwalk, a business license application which falsely
20 identified Michelle Tran, DDS, as the owner of a business called "Millennium Dental
21 Care" which was located at 11874 Rosecrans Avenue in Norwalk.

22 41. On or about and between January 12, 2000, and July 12, 2000, on one or more occasions,
23 unnamed coconspirators used the personal identifying information of Michelle Tran, DDS
24 to order dental supplies from JB Dental Supply Company.

25 42. On or about January 21, 2000, **Zubin Plasencia** interviewed Tony Hsu, DDS at
26 Plasencia's home in West Covina, CA, to work at a dental clinic at 11874 Rosecrans
27 Avenue in Norwalk., which was ultimately named Millennium Dental.

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- 1 43. On or about and between February 4, 2000 and February 15, 2000, on one or more
2 occasions, **Javiero Romo** asked Gilberto Boris Ravelli to cash a check written from a
3 Bank of America Account for Santa Rosa Dental Group stating that the account belonged
4 to his brother-in-law who was currently in Mexico.
- 5 44. On or about and between February 4, 2000 and February 15, 2000, on one or more
6 occasions, **Javiero Romo** drove Gilberto Ravelli to a Bank of America in Norwalk, CA,
7 where Ravelli cashed a check made out to himself and then gave the money to Romo.
- 8 45. On or about February 11, 2000, when Michelle Tran, DDS, arrived to work at
9 Millennium Dental, **Zubin Plasencia** told Dr. Tran to go home because another dentist
10 would “cover” for her.
- 11 46. On or about February 14, 2000, **Javier Romo** and **Zubin Plasencia** signed a partnership
12 agreement for the joint ownership of Millennium Dental Care up to August 14, 2000,
13 with Plasencia’s gradual buy-out of the clinic thereafter.
- 14 47. On or about February 14, 2000, **Maria Maximiliano Iriarte** signed as a witness to the
15 partnership agreement between Javier Romo and Zubin Plasencia regarding their joint
16 ownership of Millennium Dental Care.
- 17 48. On or about February 21, 2000, after Michelle Tran, DDS, contacted the Medi-Cal
18 Provider Unit and asked that her Medi-Cal Provider Application not be processed, **Zubin**
19 **Plasencia** asked Tony Hsu, called Tony Hsu DDS and asked him if he had a Medi-Cal
20 provider number.
- 21 49. On or about February 21, 2000, **Zubin Plasencia** offered Tony Hsu, DDS, a job at
22 Millennium Dental stating “you have to get a provider number.”
- 23 50. On or about February 23, 2000, **Zubin Plasencia** asked Tony Hsu, DDS, to sign an
24 employment contract and fill out an application for a Medi-Cal provider number.
- 25 51. On or about February 24, 2000, after Tony Hsu, DDS has worked for several days without
26 seeing a patient, **Zubin Plasencia** told Dr. Hsu to go home and he would call Dr. Hsu
27 when Hsu’s provider number had been approved.
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- 1 52. On or about and between January 21, 2000 and March 16, 2000, **Zubin Plasencia**
2 entered into contract negotiations with John A. Krajian, DDS, whereby Dr. Tony Hsu’s
3 Medi-Cal provider number would be used to bill for dental services rendered by Dr.
4 Krajian.
- 5 53. On or about February 28, 2000, **Zubin Plasencia** interviewed John Shui DDS, at
6 Plasencia’s residence in West Covina, for a position as a dentist at Millennium Dental.
- 7 54. On or about February 28, 2000, **Zubin Plasencia** asked John Shui DDS, to fill out an
8 application for a Medi-Cal provider number.
- 9 55. On or about March 2, 2000, **Zubin Plasencia** asked John Shui DDS to fill out and sign
10 an employment contract and Shui complied.
- 11 56. On or about March 16, 2000, after receiving a proposed contract from John A. Krajian,
12 DDS, **Zubin Plasencia** sent John A. Krajian a facsimilie stating “Please call me ASAP
13 Dr. Tony Hsu does not want to go further.”
- 14 57. On or about March 16, 2000, **Zubin Plasencia** interviewed Dan Thanh Le, DDS, to work
15 as a dentist at Millennium Dental on Rosecrans in Norwalk, CA.
- 16 58. On or about March 16, 2000, **Zubin Plasencia** asked Dan Thanh Le, DDS, to sign a
17 provider application, telling Dr Le that she would be listed as a treating provider only.
- 18 59. On or about March 16, 2000, in response to Dan Thanh Le, DDS’ inquiry about Simmona
19 Kiss, DDS’ dental license hanging on the wall at Millennium Dental Group, **Zubin**
20 **Plasencia** falsely stated that Dr. Kiss worked at Millennium Dental on the days that Dr.
21 Le was not working.
- 22 60. On or about March 16, 2000, **Zubin Plasencia** introduced Dan Thanh Le, DDS, to
23 Monica Maximiliano stating that she was a licensed dentist in another country.
- 24 61. On or about and between March 16, 2000, and July 12, 2000, on one or more occasions,
25 **Monica Maximiliano** provided dental care to a patient at Millennium Dental while
26 masquerading as a dentist.

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- 1 62. On or about March 16, 2000, **Zubin Plasencia** and unnamed coconspirators signed and
2 caused to be signed, an Application for Credit falsely listing Dan Thanh Le, DDS, as the
3 owner of Millennium Dental
- 4 63. On or about March 20, 2000, **Zubin Plasencia** and unnamed coconspirators signed and
5 caused to be signed, a Fictitious Business Name Statement for Dan Thanh Thi Le doing
6 business as Millennium Dental at 11874 Rosecrans Avenue in Norwalk, CA.
- 7 64. On or about and between March 16, 2000, and July 12, 2000, unknown coconspirators
8 used the Medi-Cal Provider number issued to Dan Thanh Le, DDS, to submit one or more
9 claims to Denti-Cal requesting payment for radiographs (x-rays) which were never taken.
- 10 65. On or about and between January 12, 2000 and July 12, 2000, on one or more occasions,
11 **Javier Romo** paid Gilberto Ravelli for distributing flyers and advertising gifts and for
12 driving patients to Millennium Dental.
- 13 66. On or about and between January 12, 2000 and July 12, 2000, on one or more occasions,
14 **Zubin Plasencia** paid Gilberto Ravelli for distributing flyers and advertising gifts and
15 for driving patients to Millennium Dental.
- 16 67. On or about and between March 16, 2000 and July 12, 2000, on one or more occasions,
17 **Juan Carlos Avila** provided dental to care to one or more patients at Millennium Dental
18 while masquerading as a dentist.
- 19 68. On or about and between April 1, 2000 and July 12, 2000, on one or more occasions,
20 **Teresa Mendivil** provided dental to care to one or more patients at Millennium Dental
21 while masquerading as a dentist.
- 22 69. On or about April 5, 2000, **Zubin Plasencia** and unnamed coconspirators signed and
23 caused to be signed, a letter “To Whom It May Concern” requesting that Dr. Le’s
24 “provider number [be] changed from San Bernardino Dental Group to Millennium Dental
25 as [her] D/B/A”.

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- 1 70. On or about April 20, 2000, **Zubin Plasencia** signed a letter addressed to Foothill Bank
2 regarding account number 448-125750, stating that Dan Thanh Le, DDS, only had
3 authority to inquire about information related to that bank account.
- 4 71. On or about May 1, 2000, **Zubin Plasencia** and unnamed coconspirators wrote, and
5 caused to be written, the following on a photocopy of a Business License issued by the
6 City of Norwalk: “I, Zubin Plasencia would like to delete Dr. Tran and like to add Dr.
7 John Shui to the business license.”
- 8 72. On or about May 10, 2000, **Zubin Plasencia** and **Javier Romo** entered into a purchase
9 agreement with respect to Millennium Dental a dental office formerly known as Santa
10 Rosa Dental.
- 11 73. On or about May 15, 2000, **Zubin Plasencia** interviewed Binh Ngo, DDS, for a position
12 as a dentist at Millennium Dental and introduced himself to Dr. Ngo as “Dr. Zubin.”
- 13 74. On or about May 17, 2000, **Zubin Plasencia** interviewed Ehab Ismail, DDS, about a
14 position at Millennium Dental and said that Simmona Kiss, DDS, was Plasencia’s
15 “partner” at Plasencia’s Long Beach Clinic.
- 16 75. On or about May 24, 2000, **Zubin Plasencia** asked Ehab Ismail, DDS, to fill out a Denti-
17 Cal Provider Application.
- 18 76. On or about May 25, 2000, Teresa Mendivil provided dental to care to one or more
19 patients while masquerading as a dentist.
- 20 77. On or about May 30, 2000, **Zubin Plasencia** asked Binh Ngo, DDS, to sign a Denti-Cal
21 application because Dr. Ngo “treated Denti-Cal patients.”
- 22 78. On or about June 1, 2000, **Zubin Plasencia** interviewed Ahmed Rabie, DDS, for a
23 position as a dentist at Millennium Dental Clinic.
- 24 79. On or about June 1, 2000, **Zubin Plasencia** asked Ahmed Rabie, DDS, to fill out and
25 sign a Denti-Cal Provider Application, stating “I cannot use my Medi-Cal number
26 anymore.”

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- 1 80. On or about June 6, 2000, unnamed coconspirators signed the name of Ben Ngo, DDS, to
2 a Fictitious Name Statement as a member of a general partnership doing business as
3 Millennium Dental located at 11874 Rosecrans Avenue in Norwalk, CA.
- 4 81. On or about June 9, 2000, **Zubin Plasencia** and unnamed coconspirators signed the name
5 of “Dan Thanh Thi Le” without her permission to a letter addressed “To Whom It May
6 Concern”, advising them that she “will turn over the business of Millennium Dental to
7 my associates Dr. Ehab Ismail and Dr. Binh T. Ngo effective immediately on 6/9/00.”
- 8 82. On or about June 16, 2000, unnamed coconspirators signed the name of “Dr. Ben Ngo”
9 without his permission to a general partnership agreement for Millennium Dental, a
10 dental practice located at 11874 Rosecrans Avenue in Norwalk, CA.
- 11 83. On or about June 16, 2000, unnamed coconspirators signed the name of “Dr. Ahmed
12 Rabie” without his permission to a general partnership agreement for Millennium Dental,
13 a dental practice located at 11874 Rosecrans Avenue in Norwalk, CA.
- 14 84. On or about June 16, 2000, unnamed coconspirators signed the name of “Dr. Ehab Ismail”
15 without his permission to a general partnership agreement for Millennium Dental, a
16 dental practice located at 11874 Rosecrans Avenue in Norwalk, CA.
- 17 85. On or about June 23, 2000, **Zubin Plasencia** and unnamed coconspirators signed and
18 caused to be signed, a letter to Cal-Fed Bank written in the name of Dan Thanh Le, DDS,
19 stating that all checks issued in Dr. Le’s name were to be deposited into the bank account
20 opened in the name of Millennium Dental.

21 **Don Bosco Dental**

- 22 86. On or about January 17, 1998, **Enrique Valer** created, and caused to be created, a
23 fraudulent California Drivers License numbered P4834844 which contained Valer’s
24 photograph with the identity of “Victor Salinas”.

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- 1 87. On or about and between November 1, 1999 and March 31, 2000, an unidentified
2 coconspirator used a Denti-Cal Provider number which had been issued to *Christine Thu*
3 *Phung, DDS*, to bill for dental services which had not been provided by a dentist
4 authorized to provide Denti-Cal services at that location, to wit, the Don Bosco Dental
5 Office at 13373 Perris Boulevard #201, in Moreno Valley, CA.
- 6 88. On or about and between November 1, 1999, an unidentified coconspirator used the
7 identifying information of *Christine Thu Phung, DDS*, without her permission, to open a
8 bank account for Don Bosco Dental Office.
- 9 89. On or about and between January 1, 2000 and April 15, 2000, **Enrique Valer** caused
10 Denti-Cal checks which had been issued in the name of *Christine Thu Phung, DDS*, to be
11 deposited in the bank account in her name which had been opened without her
12 permission.
- 13 90. On or about and between November 1, 1999, and July 12, 2000, **Enrique Valer** used the
14 alias of “Victor Salinas” to write checks from the bank account that had been opened in
15 the name of, and without permission of, *Christine Thu Phung, DDS*.

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19 **COUNT 2**

20 On or about or between January 1, 1997 and July 12, 2000, in the County of Los Angeles,
21 State of California, defendants, **Enrique Valer, Julio Javier Romo, Zubin Plasencia, Gabriel**
22 **Humberto Rios, Monica Maximiliano, Juan Carlos Avila, Teresa Mendivil, and Carmen**
23 **Revelli**, committed the crime of **GRAND THEFT** in that said defendants did wilfully and
24 unlawfully take property from the State of California’s Medi-Cal Dental Program of a value
25 exceeding Four Hundred Dollars (\$400), in violation of Penal Code §487(a), a FELONY.

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COUNT 3

On or about or between January 1, 1997 and July 12, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer, Julio Javier Romo, Zubin Plasencia, Gabriel Humberto Rios, Monica Maximiliano, Juan Carlos Avila, Teresa Mendivil, and Carmen Revelli**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendants did commit or aid, abet, solicit, or conspire with others known and unknown, and did knowingly make or cause to be made false or fraudulent claims for payment of a health care benefit under the provider number fraudulently obtained and used for one or more dentists, to the Medi-Cal Dental program, in violation of Penal Code §550(a)(6), a FELONY.

SPECIAL ALLEGATION

LOSS OVER \$50,000: Penal Code §12022.6(a)(1)

It is further alleged that in the commission of the felonies charged in Counts 1 through 3 that defendants **Enrique Valer, Julio Javier Romo, and Zubin Plasencia**, with the intent to cause so, took, damaged, and destroyed property of a value in excess of Fifty Thousand Dollars (\$50,000), within the meaning of Penal Code §12022.6(a)(1).

SPECIAL ALLEGATION

LOSS OVER \$150,000: Penal Code §12022.6(a)(2)

It is further alleged that in the commission of the felonies charged in Counts 1 through 3 that defendants **Julio Javier Romo, and Zubin Plasencia**, with the intent to cause so, took, damaged, and destroyed property of a value in excess of One Hundred Fifty-Thousand Dollars (\$150,000), within the meaning of Penal Code §12022.6(a)(2).

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COUNT 4

On or about or between September 9, 1999, and April 26, 2000, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **IDENTITY THEFT** in that said defendants, did willfully and unlawfully obtain personal identifying information of *Simmona Kiss, DDS*, without authorization, and used that information for an unlawful purpose and to obtain, or attempt to obtain credit, goods, services, or medical information through the use of said personal identifying information, without the consent of *Simmona Kiss, DDS*, in violation of Penal Code §530.5(a), a felony.

SPECIAL ALLEGATION - Statute of Limitations - Late Discovery

It is further alleged as to Count 4, that above violation is tolled within the meaning of Penal Code section 803(c), until April 26, 2000, when *Simmona Kiss, DDS* received a facsimile from CCC Continental Commercial Group notifying her that dental supplies had been ordered in her name from Pearson Dental Supply on behalf of Santa Rosa Dental, and that a balance of \$1,160 was still owed to Pearson Dental Supply, and that neither the victim (*Simmona Kiss, DDS*) of said violation nor any law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said date.

COUNT 5

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Carlos A.	99362117791	December 7, 1999

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COUNT 6

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Alejandro G	99362117796	December 9, 1999

COUNT 7

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Erica G.	99362117805	December 9, 1999

COUNT 8

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Lorena G.	99362117795	December 9, 1999

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COUNT 9

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Martin G.	99362131051	December 9, 1999

COUNT 10

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Miguel G.	99362131052	December 9, 1999

COUNT 11

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Norma G.	99362117797	December 9, 1999

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COUNT 12

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Joel G.	99362117800	December 9, 1999

COUNT 13

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Hector H.	99362117781	December 6, 1999

COUNT 14

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Yessica M.	99362131047	December 10, 1999

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COUNT 15

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Brenda Re.	99362128330	December 8, 1999

COUNT 16

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Tania R.	99362128329	December 8, 1999

COUNT 17

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Brenda Ro.	99362117772	December 6, 1999

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COUNT 18

On or about December 28, 1999, in the County of Los Angeles, State of California, defendants, **Enrique Valer** and **Julio Javier Romo**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Adriana R.	99362117773	December 6, 1999

COUNT 19

On or about December 30, 1999, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo**, and **Gabriel Humberto Rios**, committed the crime of **MONEY LAUNDERING**, in that said defendants did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3289765, represents, and is derived directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a FELONY.

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1 **COUNT 20**

2 On or about January 6, 2000, in the County of Los Angeles, State of California,
3 defendants, **Julio Javier Romo**, and **Gabriel Humberto Rios**, committed the crime of
4 **MONEY LAUNDERING**, in that said defendants did willfully conduct and attempt to conduct,
5 and aid and abet in conducting, a transaction involving a monetary instrument or instruments
6 through a financial institution with the intent to promote, manage establish, carry on, and
7 facilitate the promotion, management establishment and carrying on of criminal activity, to wit,
8 Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the
9 monetary instruments, to wit, Denti-Cal Warrant Number 3293683, represents, and is derived
10 directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code
11 §186.10(a), a FELONY.

12
13 **COUNT 21**

14 On or about January 13, 2000, in the County of Los Angeles, State of California,
15 defendants, **Julio Javier Romo**, and **Gabriel Humberto Rios**, committed the crime of **MONEY**
16 **LAUNDERING**, in that said defendants did willfully conduct and attempt to conduct, and aid
17 and abet in conducting, a transaction involving a monetary instrument or instruments through a
18 financial institution with the intent to promote, manage establish, carry on, and facilitate the
19 promotion, management establishment and carrying on of criminal activity, to wit, Grand Theft,
20 Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary
21 instruments, to wit, Denti-Cal Warrant Number 3298114, represents, and is derived directly or
22 indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a
23 FELONY.

24 **SPECIAL ALLEGATION**

25 **TRANSACTIONS OVER \$50,000: Penal Code §186.10(c)(1)(A)**

26 It is further alleged that in the commission or attempted commission of the felony charged
27 in Counts 19 through 21 that defendants, **Julio Javier Romo**, and **Gabriel Humberto Rios**
28

1 laundered money of a value in excess of Fifty Thousand Dollars (\$50,000), within the meaning
2 of Penal Code §186.10(c)(1)(A).

3
4 **COUNT 22**

5 On or about or between December 30, 1999 and January 13, 2000, in the County of Los
6 Angeles, State of California, defendant, **Julio Javier Romo**, committed the crime of **MONEY**
7 **LAUNDERING**, in that he did willfully and unlawfully conduct, or aid and abet, transactions
8 involving monetary instruments through one or more financial institutions, with the knowledge
9 that the monetary instruments represent, and are derived directly or indirectly, from the proceeds
10 of a criminal activity in violation of Penal Code §186.10(a)(2), a felony

11
12 **COUNT 23**

13 On or about or between February 4, 2000 and February 9, 2000, in the County of Los
14 Angeles, State of California, defendant, **Julio Javier Romo**, committed the crime of **MONEY**
15 **LAUNDERING**, in that he did willfully and unlawfully conduct, or aid and abet, transactions
16 involving monetary instruments through one or more financial institutions, with the knowledge
17 that the monetary instruments represent, and are derived directly or indirectly, from the proceeds
18 of a criminal activity in violation of Penal Code §186.10(a)(2), a felony

19
20 **COUNT 24**

21 On or about or between March 16, 2000, and April 15, 2000, in the County of Los
22 Angeles, State of California, defendants, **Julio Javier Romo** and **Zubin Plasencia**, committed
23 the crime of **IDENTITY THEFT** in that said defendants, did willfully and unlawfully obtain
24 personal identifying information of *Dan Thanh Le, DDS*, without authorization, and used that
25 information for an unlawful purpose and to obtain, or attempt to obtain credit, goods, services, or
26 medical information through the use of said personal identifying information, without the consent
27 of *Dan Thanh Le, DDS*, in violation of Penal Code §530.5(a), a felony.

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COUNT 25

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo** and **Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Candy B.	00158117122	May 30, 2000

COUNT 26

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo** and **Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Dijon C.	00158117120	May 30, 2000

COUNT 27

On or about June 2, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo** and **Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Esmeralda C.	00154108398	May 24, 2000

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COUNT 28

On or about June 2, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Traci D.	00154108387	May 22, 2000

COUNT 29

On or about June 2, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Mario G.	00154108390	May 22, 2000

COUNT 30

On or about June 2, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Adam L.	00154108393	May 24, 2000

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COUNT 31

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Alicia M.	00158117119	May 30, 2000

COUNT 32

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Regina M.	00158117118	May 30, 2000

COUNT 33

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Benigna O.	00158117123	May 30, 2000

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COUNT 34

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Flavia O.	00158117124	May 30, 2000

COUNT 35

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Mario O.	00158116536	May 30, 2000

COUNT 36

On or about June 6, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo and Zubin Plascenia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Edwardo S.	00158117121	May 30, 2000

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COUNT 37

On or about May 24, 2000, in the County of Los Angeles, State of California, defendants, **Julio Javier Romo** and **Zubin Plasencia**, committed the crime of **MEDI-CAL FRAUD** in that said defendant[s], knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Gregoria S.	00145107657	May 15, 2000

COUNT 38

On or about April 20, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management, establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3355217, represents, or is derived directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a FELONY.

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COUNT 39

On or about April 27, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management, establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3359214, represents, or is derived directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a FELONY.

COUNT 40

On or about May 4, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management, establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3363031, represents, or is derived directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a FELONY.

COUNT 41

On or about May 11, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote,

1 manage establish, carry on, and facilitate the promotion, management, establishment and carrying
2 on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration,
3 with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3367108,
4 represents, or is derived directly or indirectly, from the proceeds of a criminal activity in
5 violation of Penal Code §186.10(a), a FELONY.

6
7 **COUNT 42**

8 On or about May 18, 2000, in the County of Los Angeles, State of California, defendant,
9 **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did
10 willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving
11 a monetary instrument or instruments through a financial institution with the intent to promote,
12 manage establish, carry on, and facilitate the promotion, management, establishment and carrying
13 on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration,
14 with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3370437,
15 represents, or is derived directly or indirectly, from the proceeds of a criminal activity in
16 violation of Penal Code §186.10(a), a FELONY.

17
18 **COUNT 43**

19 On or about May 25, 2000, in the County of Los Angeles, State of California, defendant,
20 **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did
21 willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving
22 a monetary instrument or instruments through a financial institution with the intent to promote,
23 manage establish, carry on, and facilitate the promotion, management, establishment and carrying
24 on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration,
25 with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3375156,
26 represents, or is derived directly or indirectly, from the proceeds of a criminal activity in
27 violation of Penal Code §186.10(a), a FELONY.

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COUNT 44

On or about June 1, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management, establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3379085, represents, or is derived directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a FELONY.

COUNT 45

On or about June 8, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management, establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3383181, represents, or is derived directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a FELONY.

COUNT 46

On or about June 15, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote,

1 manage establish, carry on, and facilitate the promotion, management, establishment and carrying
2 on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration,
3 with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3386248,
4 represents, or is derived directly or indirectly, from the proceeds of a criminal activity in
5 violation of Penal Code §186.10(a), a FELONY.

6
7 **COUNT 47**

8 On or about June 22, 2000, in the County of Los Angeles, State of California, defendant,
9 **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did
10 willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving
11 a monetary instrument or instruments through a financial institution with the intent to promote,
12 manage establish, carry on, and facilitate the promotion, management, establishment and carrying
13 on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration,
14 with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3391227,
15 represents, or is derived directly or indirectly, from the proceeds of a criminal activity in
16 violation of Penal Code §186.10(a), a FELONY.

17
18 **COUNT 48**

19 On or about July 6, 2000, in the County of Los Angeles, State of California, defendant,
20 **Zubin Plasencia**, committed the crime of **MONEY LAUNDERING**, in that said defendant did
21 willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving
22 a monetary instrument or instruments through a financial institution with the intent to promote,
23 manage establish, carry on, and facilitate the promotion, management, establishment and carrying
24 on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration,
25 with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3398769,
26 represents, or is derived directly or indirectly, from the proceeds of a criminal activity in
27 violation of Penal Code §186.10(a), a FELONY.

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SPECIAL ALLEGATION

TRANSACTIONS OVER \$50,000: Penal Code §186.10(c)(1)(A)

It is further alleged that in the commission or attempted commission of the felony charged in Counts 38 through 48 that defendant, **Zubin Plasencia** laundered money of a value in excess of Fifty Thousand Dollars (\$50,000), within the meaning of Penal Code §186.10(c)(1)(A).

SPECIAL ALLEGATION

TRANSACTIONS OVER \$150,000: Penal Code §186.10(c)(1)(B)

It is further alleged that in the commission or attempted commission of the felony charged in Counts 38 through 48 that defendant, **Zubin Plasencia** laundered money of a value in excess of One Hundred Fifty-Thousand Dollars (\$150,000), within the meaning of Penal Code §186.10(c)(1)(B).

COUNT 49

On or about or April 1, 2000 and July 12, 2000, in the County of Los Angeles, State of California, defendant, **Zubin Plasencia**, committed the crime of **PAYING UNLAWFUL MEDI-CAL REMUNERATION**, in that said defendant unlawfully offered to pay and paid remuneration in the form of various checks, kickbacks and rebates to one or more individuals in return for referring one or more Medi-Cal beneficiaries to Millennium Dental so that Millennium Dental could furnish and arrange to furnish services and merchandise; and in return for the purchasing and ordering, and arranging for and recommending the purchasing and ordering, of goods, services and merchandise; for which payment may be made under the Medi-Cal Act, in violation of Welfare and Institutions Code section 14107.2(b), a FELONY.

COUNT 50

On or about or April 1, 2000 and July 12, 2000, in the County of Los Angeles, State of California, defendant, **Carmen Revelli**, committed the crime of **RECEIVING UNLAWFUL**

1 **MEDI-CAL REMUNERATION**, in that said defendant unlawfully solicited and received
2 remuneration in the form of various checks, kickbacks and rebates in return for referring one or
3 more Medi-Cal beneficiaries to Millennium Dental so that Millennium Dental could furnish and
4 arrange to furnish services and merchandise; and in return for the purchasing and ordering, and
5 arranging for and recommending the purchasing and ordering, of goods, services and
6 merchandise; for which payment may be made under the Medi-Cal Act, in violation of Welfare
7 and Institutions Code section 14107.2(a), a FELONY.

8
9 **COUNT 51**

10 On or about or between January 12, 2000, and July 12, 2000, in the County of Los
11 Angeles, State of California, defendants, **Julio Javier Romo** and **Zubin Plasencia**, committed
12 the crime of **IDENTITY THEFT** in that said defendants, did willfully and unlawfully obtain
13 personal identifying information of *Dan Thanh Le, DDS*, without authorization, and used that
14 information for an unlawful purpose and to obtain, or attempt to obtain credit, goods, services, or
15 medical information through the use of said personal identifying information, without the consent
16 of *Dan Thanh Le, DDS*, in violation of Penal Code §530.5(a), a felony.

17
18 **SPECIAL ALLEGATION - Statute of Limitations - Late Discovery**

19 It is further alleged as to Count 51, that above violation is tolled within the
20 meaning of Penal Code section 803(c), until June 1, 2000, when *Michelle Tran, DDS*, met with
21 Los Angeles Detective Steven Opferman and Department of Health Services Investigator Holly
22 Collins, and first learned that a business license application which identified *Michelle Tran,*
23 *DDS*, was an owner of Millennium Dental was filed with the City of Norwalk without *Dr.*
24 *Tran's* permission, and that neither the victim (*Michelle Tran, DDS*) of said violation nor any
25 law enforcement agency chargeable with the investigation and prosecution of said violation had
26 actual and constructive knowledge of said violation prior to said date.

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COUNT 52

On or about or between November 1, 1999, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **IDENTITY THEFT** in that said defendant, did willfully and unlawfully obtain personal identifying information of *Christine Thu Phung, D.D.S.*, without authorization, and used that information for an unlawful purpose and to obtain, or attempt to obtain credit, goods, services, or medical information through the use of said personal identifying information, without the consent of *Christine Thu Phung, D.D.S.*, in violation of Penal Code §530.5(a), a felony.

SPECIAL ALLEGATION - Statute of Limitations - Late Discovery

It is further alleged as to Count 52, that above violation is tolled within the meaning of Penal Code section 803(c), until November 26, 2002, when *Christine Thu Phung, D.D.S.*, met with Bureau of Medi-Cal Fraud Special Agent Sonia Rios and first learned that her identifying information was used, without her permission, file a fictitious business name statement to do business as Don Bosco Dental and to open a bank account in her name, y, and that neither the victim (*Christine Thu Phung, DDS*) of said violation nor any law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said date.

COUNT 53

On or about January 10, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **MEDI-CAL FRAUD** in that said defendant, knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Richard R.	00010123610	December 28, 1999

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COUNT 54

On or about February 25, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **MEDI-CAL FRAUD** in that said defendant, knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Brenda C.	00056109855	January 21, 2000

COUNT 55

On or about February 25, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **MEDI-CAL FRAUD** in that said defendant, knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Carla D.	00056114180	February 4, 2000

COUNT 56

On or about February 25, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **MEDI-CAL FRAUD** in that said defendant, knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Shepard M.	00056114178	February 4, 2000

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COUNT 57

On or about February 25, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **MEDI-CAL FRAUD** in that said defendant, knowingly and willfully with intent to defraud, submitted and caused to be submitted for allowance and payment, a false and fraudulent claim for furnishing medical services and merchandise under the Medi-Cal Act, in violation of section 14107 of the Welfare and Institutions Code, a felony, to wit:

Beneficiary	Claim Number	Date Service Allegedly Provided
Novkane V.	00056114182	January 27, 2000

COUNT 58

On or about January 13, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management, establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal Warrant Number 3299507, represents, or is derived directly or indirectly, from the proceeds of a criminal activity in violation of Penal Code §186.10(a), a FELONY.

COUNT 59

On or about January 20, 2000, in the County of Los Angeles, State of California, defendant, **Enrique Valer**, committed the crime of **MONEY LAUNDERING**, in that said defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a transaction involving a monetary instrument or instruments through a financial institution with the intent to promote, manage establish, carry on, and facilitate the promotion, management,

1 establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and
2 Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal
3 Warrant Number 3301345, represents, or is derived directly or indirectly, from the proceeds of a
4 criminal activity in violation of Penal Code §186.10(a), a FELONY.

5
6 **COUNT 60**

7 On or about January 27, 2000, in the County of Los Angeles, State of California,
8 defendant, **Enrique Valer**, committed the crime of **MONEY LAUNDERING**, in that said
9 defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a
10 transaction involving a monetary instrument or instruments through a financial institution with
11 the intent to promote, manage establish, carry on, and facilitate the promotion, management,
12 establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and
13 Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal
14 Warrant Number 3307597, represents, or is derived directly or indirectly, from the proceeds of a
15 criminal activity in violation of Penal Code §186.10(a), a FELONY.

16
17 **COUNT 61**

18 On or about February 17, 2000, in the County of Los Angeles, State of California,
19 defendant, **Enrique Valer**, committed the crime of **MONEY LAUNDERING**, in that said
20 defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a
21 transaction involving a monetary instrument or instruments through a financial institution with
22 the intent to promote, manage establish, carry on, and facilitate the promotion, management,
23 establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and
24 Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal
25 Warrant Number 3319602, represents, or is derived directly or indirectly, from the proceeds of a
26 criminal activity in violation of Penal Code §186.10(a), a FELONY.

1 **COUNT 62**

2 On or about February 24, 2000, in the County of Los Angeles, State of California,
3 defendant, **Enrique Valer**, committed the crime of **MONEY LAUNDERING**, in that said
4 defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a
5 transaction involving a monetary instrument or instruments through a financial institution with
6 the intent to promote, manage establish, carry on, and facilitate the promotion, management,
7 establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and
8 Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal
9 Warrant Number 3323647, represents, or is derived directly or indirectly, from the proceeds of a
10 criminal activity in violation of Penal Code §186.10(a), a FELONY.

11
12 **COUNT 63**

13 On or about March 16, 2000, in the County of Los Angeles, State of California,
14 defendant, **Enrique Valer**, committed the crime of **MONEY LAUNDERING**, in that said
15 defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a
16 transaction involving a monetary instrument or instruments through a financial institution with
17 the intent to promote, manage establish, carry on, and facilitate the promotion, management,
18 establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and
19 Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal
20 Warrant Number 3333861, represents, or is derived directly or indirectly, from the proceeds of a
21 criminal activity in violation of Penal Code §186.10(a), a FELONY.

22
23 **COUNT 64**

24 On or about March 23, 2000, in the County of Los Angeles, State of California,
25 defendant, **Enrique Valer**, committed the crime of **MONEY LAUNDERING**, in that said
26 defendant did willfully conduct and attempt to conduct, and aid and abet in conducting, a
27 transaction involving a monetary instrument or instruments through a financial institution with
28

1 the intent to promote, manage establish, carry on, and facilitate the promotion, management,
2 establishment and carrying on of criminal activity, to wit, Grand Theft, Health Care Fraud, and
3 Unlawful Remuneration, with the knowledge that the monetary instruments, to wit, Denti-Cal
4 Warrant Number 3337852, represents, or is derived directly or indirectly, from the proceeds of a
5 criminal activity in violation of Penal Code §186.10(a), a FELONY.

6
7 **SPECIAL ALLEGATION**

8 **TRANSACTIONS OVER \$50,000: Penal Code §186.10(c)(1)(A)**

9 It is further alleged that in the commission or attempted commission of the felony charged
10 in Counts 58 through 64 that defendant, **Enrique Valer** laundered money of a value in excess of
11 Fifty Thousand Dollars (\$50,000), within the meaning of Penal Code §186.10(c)(1)(A).

12
13 **SPECIAL ALLEGATION**

14 **TRANSACTIONS OVER \$150,000: Penal Code §186.10(c)(1)(B)**

15 It is further alleged that in the commission or attempted commission of the felony charged
16 in Counts 58 through 64 that defendant, **Enrique Valer** laundered money of a value in excess of
17 Fifty Thousand Dollars (\$150,000), within the meaning of Penal Code §186.10(c)(1)(B).

18
19 **SPECIAL ALLEGATION - ENRIQUE VALER**

20 **AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT**

21 **LOSS OVER \$100,000: Penal Code §186.11(a)(1)**

22 It is further alleged that the offenses charged in Counts 1 through 3, Counts 5-18, and
23 Counts 51-55, committed by defendant **Enrique Valer**, are related felonies, a material element
24 of which is fraud, which involve a pattern of related felony conduct, and the pattern of related
25 felony conduct involves the taking of more than One Hundred Thousand Dollars (\$100,000),
26 within the meaning of Penal Code §186.11(a)(1).

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SPECIAL ALLEGATION - JULIO JAVIER ROMO
AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT
LOSS OVER \$100,000: Penal Code §186.11(a)(1)

It is further alleged that the offenses charged in Counts 1 through 3, Counts 5 through 23, and Counts 25-37, committed by defendant **Julio Javier Romo**, are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than One Hundred Thousand Dollars (\$100,000), within the meaning of Penal Code §186.11(a)(1).

SPECIAL ALLEGATION - ZUBIN PLASENCIA
AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT
LOSS OVER \$100,000: Penal Code §186.11(a)(1)

It is further alleged that the offenses charged in Counts 1 through 3, and Counts 25 through 48, committed by defendant **Zubin Plasencia**, are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than One Hundred Thousand Dollars (\$100,000), within the meaning of Penal Code §186.11(a)(1).

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REQUEST FOR ARREST WARRANT

Based upon this complaint and the accompanying declaration in support of arrest warrant, I respectfully request that warrants be issued for the arrest of the defendants pursuant to Penal Code section 813 et seq.

DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed at Norwalk, California this ____ day of January, 2003.

SONIA RIOS
Special Agent
Bureau of Medi-Cal Fraud
California Department of Justice

1 **REQUEST FOR DISCOVERY**

2 Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request
3 from defense counsel all materials and information which disclosure is required by Penal Code
4 section 1054.3. This request is a continuing request for all included items, from this date
5 through the conclusion of the case.

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1 **HOLDING ORDER**

2 Based on the evidence presented at the preliminary hearing, it appears that the following
3 offenses charged in this Complaint have been committed and that there is sufficient cause to believe
4 that the above-captioned defendants, are guilty of these offenses,

5 **IT IS HEREBY ORDERED**, pursuant to sections 872 and 875 of the Penal Code, that the
6 defendants are held to answer in Superior Court for the following offenses:

7 **Defendant Enrique Valer**

8 <u>Count</u>	9 <u>Charge</u>	10 <u>Charge</u> <u>Range</u>	11 <u>Special</u> <u>Allegation</u>
12 1	13 Pen.Code, §§182(a)(1)&(4), 186.10, 487, 550(a), 14 and Welf.&Inst. Code §§14107 & 14017.2 15 Conspiracy to Commit Grand Theft and Cheat 16 and Defraud the Medi-Cal Program, Payment of 17 Unlawful Remuneration, Health Benefits Fraud 18 and Money Laundering	19 2-3-5	
20 2	21 Penal Code, §487(a) 22 Grand Theft	23 16-2-3	
24 3	25 Penal Code, §550(a)(6) 26 Health Benefits Fraud	27 2-3-5	
28	29 <u>Special Allegation Re Counts 1, 2 & 3</u> 30 Pen Code § 12022.6(a)(1) - Taking > \$ 50,000 31 Pen.Code § 12022.6(a)(2) - Taking > \$150,000		32 +1 Year 33 +2 Years
34 4	35 Penal Code §530.5(a) 36 Identity Theft 37 + <u>Special Allegation (Count 4) - Late Discovery</u>	38 16-2-3	
39 5	40 Welfare.& Institutions Code, 14107 41 Medi-Cal Fraud	42 2-3-5	
43 6	44 Welfare.& Institutions Code, 14107 45 Medi-Cal Fraud	46 2-3-5	
47 7	48 Welfare.& Institutions Code, 14107 49 Medi-Cal Fraud	50 2-3-5	
51 8	52 Welfare.& Institutions Code, 14107 53 Medi-Cal Fraud	54 2-3-5	
55 9	56 Welfare.& Institutions Code, 14107 57 Medi-Cal Fraud	58 2-3-5	

1	10	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
2	11	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
3	12	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
4	13	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
5	14	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
6	15	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
7	16	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
8	17	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
9	18	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
10	51	Penal Code §530.5(a) Identity Theft	16-2-3
11	52	Penal Code §530.5(a) Identity Theft	16-2-3
12	53	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
13	54	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
14	55	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
15	56	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
16	57	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
17	58	Penal Code, § 186.10 Money Laundering	16-2-3
18	59	Penal Code, § 186.10 Money Laundering	16-2-3
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1	60	Penal Code, § 186.10 Money Laundering	16-2-3	
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3	61	Penal Code, § 186.10 Money Laundering	16-2-3	
4	62	Penal Code, § 186.10 Money Laundering	16-2-3	
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6	63	Penal Code, § 186.10 Money Laundering	16-2-3	
7	64	Penal Code, § 186.10 Money Laundering	16-2-3	
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9		<u>Special Allegation</u> Pen Code § 186.10(c)(1)(A) - Trx's > \$ 50,000		+ 1
10		Pen Code § 186.10(c)(1)(B) - Trx's > \$ 150,000		+ 2
11		<u>Special Allegation Re Counts 1-3</u> Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
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Defendant Julio Javier Romo

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1)&(4), 186.10, 487, 550(a), and Welf.&Inst. Code §§14107 & 14017.2	2-3-5	
2	Conspiracy to Commit Grand Theft and Cheat and Defraud the Medi-Cal Program, Payment of Unlawful Remuneration, Health Benefits Fraud and Money Laundering		
3	Penal Code, §487(a) Grand Theft	16-2-3	
4	Penal Code, §550(a)(6) Health Benefits Fraud	2-3-5	
5	<u>Special Allegation Re Counts 1, 2 & 3</u> Pen Code § 12022.6(a)(1) - Taking > \$ 50,000 Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+1 Year +2 Years
6	Penal Code §530.5(a) Identity Theft + <u>Special Allegation (Count 4) - Late Discovery</u>	16-2-3	
7	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
8	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
9	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
10	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
11	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
12	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
13	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
14	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
15	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
16	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
17	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
18	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
19	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
20	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
21	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
22	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
23	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
24	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
25	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
26	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
27	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	

1	14	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
2	15	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
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4	16	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
5			
6	17	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
7	18	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
8			
9	19	Penal Code, § 186.10 Money Laundering	16-2-3
10	20	Penal Code, § 186.10 Money Laundering	16-2-3
11			
12	21	Penal Code, § 186.10 Money Laundering <u>Special Allegation</u>	16-2-3
13		Pen Code § 186.10(c)(1)(A) - Trx's > \$ 50,000	+ 1 Yr
14	22	Penal Code, § 186.10 Money Laundering	16-2-3
15			
16	23	Penal Code, § 186.10 Money Laundering	16-2-3
17	24	Penal Code §530.5(a) Identity Theft	16-2-3
18			
19	25	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
20	26	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
21			
22	27	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
23	28	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
24			
25	29	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
26	30	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
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1	31	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
2	32	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
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4	33	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
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6	34	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
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8	35	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
9				
10	36	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
11				
12	37	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
13	51	Penal Code §530.5(a) Identity Theft	16-2-3	
14		<u>Special Allegation Re Counts 1-3</u> Pen.Code § 186.11(a)(1) - Loss > \$100,000		+2 Yrs
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Defendant Zubin Plasencia

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1)&(4), 186.10, 487, 550(a), and Welf.&Inst. Code §§14107 & 14017.2 Conspiracy to Commit Grand Theft and Cheat and Defraud the Medi-Cal Program, Payment of Unlawful Remuneration, Health Benefits Fraud and Money Laundering	2-3-5	
2	Penal Code, §487(a) Grand Theft	16-2-3	
3	Penal Code, §550(a)(6) Health Benefits Fraud	2-3-5	
	<u>Special Allegation Re Counts 1, 2 & 3</u> Pen Code § 12022.6(a)(1) - Taking > \$ 50,000 Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+1 Year +2 Years
24	Penal Code §530.5(a) Identity Theft	16-2-3	
25	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
26	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
27	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
28	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
29	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
30	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
31	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
32	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
33	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	
34	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5	

1	35	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
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3	36	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
4	37	Welfare.& Institutions Code, 14107 Medi-Cal Fraud	2-3-5
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6	38	Penal Code, § 186.10 Money Laundering	16-2-3
7	39	Penal Code, § 186.10 Money Laundering	16-2-3
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9	40	Penal Code, § 186.10 Money Laundering	16-2-3
10	41	Penal Code, § 186.10 Money Laundering	16-2-3
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12	42	Penal Code, § 186.10 Money Laundering	16-2-3
13	43	Penal Code, § 186.10 Money Laundering	16-2-3
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15	44	Penal Code, § 186.10 Money Laundering	16-2-3
16	45	Penal Code, § 186.10 Money Laundering	16-2-3
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18	46	Penal Code, § 186.10 Money Laundering	16-2-3
19	47	Penal Code, § 186.10 Money Laundering	16-2-3
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21	48	Penal Code, § 186.10 Money Laundering	16-2-3
22		<u>Special Allegation</u>	
23		Pen Code § 186.10(c)(1)(A) - Trx's > \$ 50,000	+ 1 Year?
		Pen Code § 186.10(c)(1)(B) - Trx's > \$ 150,000	+ 1 Year?
24	49	Welf.& Inst. Code, § 14107.2(b) Paying Unlawful Remuneration	16-2-3
25			
26	51	Penal Code §530.5(a) Identity Theft	16-2-3
27		<u>Special Allegation Re Counts 1-3</u>	
28		Pen.Code § 186.11(a)(1) - Loss > \$100,000	+2 Yrs

Defendant Monica Maximiliano

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1)&(4), 186.10, 487, 550(a), and Welf.&Inst. Code §§14107 & 14017.2	2-3-5	
4	Conspiracy to Commit Grand Theft and Cheat and Defraud the Medi-Cal Program, Payment of Unlawful Remuneration, Health Benefits Fraud and Money Laundering		
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7	2 Penal Code, §487(a) Grand Theft	16-2-3	
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9	3 Penal Code, §550(a)(6) Health Benefits Fraud	2-3-5	
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Defendant Juan Carlos Avila

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1)&(4), 186.10, 487, 550(a), and Welf.&Inst. Code §§14107 & 14017.2	2-3-5	
4	Conspiracy to Commit Grand Theft and Cheat and Defraud the Medi-Cal Program, Payment of Unlawful Remuneration, Health Benefits Fraud and Money Laundering		
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7	2 Penal Code, §487(a) Grand Theft	16-2-3	
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9	3 Penal Code, §550(a)(6) Health Benefits Fraud	2-3-5	
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Defendant Teresa Mendivil

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1)&(4), 186.10, 487, 550(a), and Welf.&Inst. Code §§14107 & 14017.2	2-3-5	
4	Conspiracy to Commit Grand Theft and Cheat and Defraud the Medi-Cal Program, Payment of Unlawful Remuneration, Health Benefits Fraud and Money Laundering		
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7	2 Penal Code, §487(a) Grand Theft	16-2-3	
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9	3 Penal Code, §550(a)(6) Health Benefits Fraud	2-3-5	
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[IT IS FURTHER ORDERED that defendant **Enrique Valer** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$ _____.] **or** [IT IS FURTHER ORDERED that defendant **Enrique Valer** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$ _____.] **or** IT IS FURTHER ORDERED that defendant **Enrique Valer** shall remain discharged from custody upon bail in the sum of \$ _____.]

[IT IS FURTHER ORDERED that defendant **Julio Javier Romo** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$ _____.] **or** [IT IS FURTHER ORDERED that defendant **Julio Javier Romo** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$ _____.] **or** IT IS FURTHER ORDERED that defendant **Julio Javier Romo** shall remain discharged from custody upon bail in the sum of \$ _____.]

[IT IS FURTHER ORDERED that defendant **Zubin Plasencia** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$ _____.] **or** [IT IS FURTHER ORDERED that defendant **Zubin Plasencia** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$ _____.] **or** IT IS FURTHER ORDERED that defendant **Zubin Plasencia** shall remain discharged from custody upon bail in the sum of \$ _____.]

[IT IS FURTHER ORDERED that defendant **Gabriel Humberto Rios** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$ _____.] **or** [IT IS FURTHER ORDERED that defendant **Gabriel Humberto Rios** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$ _____.] **or** IT IS FURTHER ORDERED that defendant **Gabriel Humberto Rios** shall remain discharged from custody upon bail in the sum of \$ _____.]

[IT IS FURTHER ORDERED that defendant **Monica Maximiliano** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$ _____.] **or** [IT IS FURTHER ORDERED that defendant **Monica Maximiliano** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$ _____.] **or** IT IS FURTHER ORDERED that defendant **Monica Maximiliano** shall remain discharged from custody upon bail in the sum of \$ _____.]

[IT IS FURTHER ORDERED that defendant **Juan Carlos Avila** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$ _____.] **or** [IT IS FURTHER ORDERED that defendant **Juan Carlos Avila** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$ _____.] **or** IT IS FURTHER ORDERED that defendant **Juan Carlos Avila** shall remain discharged from custody upon bail in the sum of \$ _____.]

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[IT IS FURTHER ORDERED that defendant **Teresa Mendivil** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$_____.] or [IT IS FURTHER ORDERED that defendant **Teresa Mendivil** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$_____.] or IT IS FURTHER ORDERED that defendant **Teresa Mendivil** shall remain discharged from custody upon bail in the sum of \$_____.]

[IT IS FURTHER ORDERED that defendant **Carmen Revelli** is committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of \$_____.] or [IT IS FURTHER ORDERED that defendant **Carmen Revelli** shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is posted in the sum of \$_____.] or IT IS FURTHER ORDERED that defendant **Carmen Revelli** shall remain discharged from custody upon bail in the sum of \$_____.]

Arraignment in Superior Court will be in Department _____, on _____, 2003, at _____ a.m./p.m.

Dated: _____
MAGISTRATE

BMFEA Docket No. OK00MC3779