1 2 3 4 5 6 7	, J	No Fee Pursuant to Government Code section 6103 TE OF CALIFORNIA
8	FOR THE COUNTY OF SAN DIEGO, CE	NTRAL DIVISION
9		
10	THE PEOPLE OF THE STATE OF CALIFORNIA,	Case No.:
11	Plaintiff,	
12	V.	COMPLAINT FOR VIOLATIONS OF
13 14 15 16 17 18 19 20 21 22 23	SUN HEALTHCARE GROUP, INC.; CARE ENTERPRISES, INC.; SUNBRIDGE HEALTHCARE CORPORATION; CARE ENTERPRISES WEST, INC.; REGENCY HEALTH SERVICES, INC.; SUNBRIDGE STOCKTON REHABILITATION CENTER, INC.; SUNBRIDGE CARE ENTERPRISES WEST, INC.; SUNBRIDGE HARBOR VIEW REHABILITATION, INC.; SUNBRIDGE MEADOWBROOK REHABILITATION, INC.; SUNBRIDGE SHANDIN HILLS REHABILITATION, INC.; SUNBRIDGE HALLMARK HEALTH SERVICES, INC.; SUNBRIDGE PARADISE REHABILITATION CENTER, INC.; SUNBRIDGE CARMICHAEL REHABILITATION CENTER, INC.; SUNBRIDGE BRASWELL ENTERPRISES, INC., Defendants.	INJUNCTION ENTERED PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 17200 et seq.
23	The PEOPLE OF THE STATE OF CALIFORNIA, b	- by and through BILL LOCKYER,
242526	Attorney General of the State of California, are informed and information and belief, allege as follows:	•

PARTIES AND VENUE

- This action is being brought pursuant to the authority under Business and Professions
 Code section 17200 *et seq*.
 - 2. This Court is the proper venue for this action because at least some of the acts and/or omissions by defendants, and each of them, which are complained of herein, occurred within the County of San Diego, Central District, State of California.
 - 3. Plaintiff is informed and believes, and thereon alleges, that at all relevant times herein mentioned defendants, and each of them, are and were doing business in the State of California, and that at all relevant times herein mentioned said defendants operated offices and were engaged in business within the County of San Diego, State of California.
 - 4. Plaintiff is informed and believes, and thereon alleges, that at all relevant times herein mentioned, the defendants, and each of them, owned, licensed, operated, administered, managed, directed, and/or controlled skilled nursing facilities located within the State of California. Each such skilled nursing facility was licensed and operating as a skilled nursing facility under the laws of the State of California, and care for at least some residents of each such skilled nursing facility was funded in part by Medi-Cal.
 - 5. Plaintiff is informed and believes, and thereon alleges, that the defendants, and each of them, were the agents, servants, associates, and/or employees of, and/or were partners and/or joint venturers with, their co-defendants, and each of them, and in doing the things herein alleged, were acting within the course and scope of their authority as such agents, servants, associates, and/or employees of, and/or as such joint venturers and/or partners with, their co-defendants, and each of them.
 - 6. Whenever in this Complaint reference is made to any act of any individual defendant, such allegation shall be deemed to mean that said defendant is and was acting: (a) as a principal, (b) under express or implied agency, and/or (c) with actual or ostensible authority to perform the acts so alleged.

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2	of defendants, and each of them, were authorized and/or ratified by officers, directors, and/or		
3	managing agents of their co-defendants, and each of them.		
4	8. Plaintiff is informed and believes, and thereon alleges, that a conspiracy to commit the		
5	acts and/or omissions alleged herein existed among the defendants, and each of them.		
6	CAUSE OF ACTION (Violations of Injunction Future of Proposed to		
7	(Violations of Injunction Entered Pursuant to Business and Professions Code § 17200 et seq.)		
8			
9	9. Plaintiff realleges and incorporates herein by reference, as though set forth in full,		
10	each and every allegation contained in each and every preceding paragraph of this Complaint.		
11	10. This cause of action is pled by plaintiff against defendants, and each of them.		
12	11. Beginning on an exact date unknown to plaintiff, but within the applicable statute of		
13	limitations for the filing of this Complaint, defendants, and each of them, intentionally engaged		
14	in and are still intentionally engaged in one or more violations of the Permanent Injunction and		
15	Final Injunction, Case No. 418519, filed on October 3, 2001, in the Superior Court of the State		
16	of California, in and for the County of San Mateo, in violation of Business and Professions Code		
17	section 17207.		
18	WHEREFORE, plaintiff requests relief as follows:		
19	PRAYER FOR RELIEF		
20	WHEREFORE, plaintiff prays for judgment against defendants, and each of them, as		
21	follows:		
22	1. Pursuant to Business and Professions Code section 17203, a superseding permanent		
23	injunction ordering defendants, and each of them, from engaging in any of the act(s) and/or		
24	practice(s) of unlawful or unfair competition referred to within this Complaint or any other act of		
25	practice of unlawful or unfair competition;		
26	2. Pursuant to Business and Professions Code section 17207, civil penalties, according to		
27	proof;		
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7. Plaintiff is informed and believes, and thereon alleges, that the acts and/or omissions

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1	3. Pursuant to Business and Professions Code section 17206, civil penalties, according to	
2	proof;	
3	4. Pursuant to Business and Professions Code section 17206.1, civil penalties, according	
4	to proof;	
5	5. Costs of suit incurred herein; and	
6	6. Such other and further relief as the Court may deem proper.	
7	Dated: Respectfully submitted,	
8	BILL LOCKYER, Attorney General of the State of California	
9		
0	D.,,	
1	By: CLAUDE W. VANDERWOLD Deputy Attorney General	
12	Deputy Attorney General Elder Abuse Prosecution Unit Bureau of Medi-Cal Fraud and Elder Abuse	
13	Office of the Attorney General California Department of Justice	
14	Attorney for Plaintiff	
15	Attorney for Flamen	
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