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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF STANISLAUS**

**THE PEOPLE OF THE STATE OF  
CALIFORNIA,**

**Plaintiff,**

**vs.**

(D01) Kyon Maung TEO, D.D.S.,  
(D02) Kin Thor PANG,  
(D03) Steve Sangmoon AHN, D.D.S.,  
(D04) Hoon Young CHANG, D.D.S.,  
(D05) Wen Hsiang CHOU, D.D.S.,  
(D06) Anthony Halili GALVAN, D.D.S.,  
(D07) Eduardo Sabater GERODIAS, D.D.S.,  
(D08) Shahryar Baradaran HASHEMI, D.D.S.,  
(D09) Keith Yoshikuzu KOMAKI, D.D.S.,  
(D10) Ricky Hung-Tak LAM, D.D.S.,  
(D11) Rahim MESBAH, D.D.S.,  
(D12) Duc Sy NGUYEN, D.D.S.,  
(D13) Sang-Hyuk "Sean" PARK, D.D.S.,  
(D14) Luis Alexandrino PINTO, D.D.S.,  
(D15) Rodolfo Poscablo RAVANERA, D.D.S.,  
(D16) Behnam ROSTAMI, D.D.S.,  
(D17) Williams Defreitas SARAIVA, D.D.S.,  
(D18) Seyed Mohamed TARIFARD, D.D.S.,  
(D19) Tri Duy VU, D.D.S.,  
(D20) Shiyu WANG, D.D.S., and  
(D21) Faruk Cenap YETEK, D.D.S.,

**Defendants.**

**CASE NO.** \_\_\_\_\_

**FELONY COMPLAINT**

**[Attorney General Case Number  
SA2002MC5588]**

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1 The People of the State of California hereby allege the above-named defendants  
2 committed the following crimes:

3 **COUNT 1**

4 **Conspiracy (Pen. Code § 182)**

5 On or about or between November 9, 1999, and December 31, 2003, in the  
6 County of Stanislaus, State of California, and elsewhere, defendants

7 (D01) Kyon Maung TEO,  
8 (D02) Kin Thor PANG,  
9 (D03) Steve Sangmoon AHN,  
10 (D04) Hoon Young CHANG,  
11 (D05) Wen Hsiang CHOU,  
12 (D06) Anthony Halili GALVAN,  
13 (D07) Eduardo Sabater GERODIAS,  
14 (D08) Shahry Baradaran HASHEMI,  
15 (D09) Keith Yoshikazu KOMAKI,  
16 (D10) Ricky Hung-Tak LAM,  
17 (D11) Rahim MESBAH,  
18 (D12) Duc Sy NGUYEN,  
19 (D13) San Hyuk PARK,  
20 (D14) Luis Alexandrino PINTO,  
21 (D15) Rudolfo Poscablo RAVANERA,  
22 (D16) Benham ROSTAMI,  
23 (D17) Williams Defreitas SARAIVA,  
24 (D18) Seyed Mohammad TARIFARD,  
25 (D19) Tri Duy VU,  
26 (D20) Shiyu WANG,  
27 (D21) Faruk Cenap YETEK,

28 and one or more other persons unknown, committed the crime of **CONSPIRACY TO**  
**COMMIT GRAND THEFT** [Pen. Code §§ 182(1), 487], **TO CHEAT AND DEFRAUD THE**  
**MEDI-CAL DENTAL PROGRAM** [Pen. Code § 182(4)], **TO COMMIT HEALTH**  
**BENEFITS FRAUD** [Pen. Code §§ 550(a)(5), 550(a)(6)], **TO COMMIT MEDI-CAL FRAUD**  
[Pen. Code § 182(1), Welf. & Inst. Code § 14107], and **TO COMMIT AN ACT INJURIOUS**  
**TO PUBLIC HEALTH AND MORALS AND THE DUE ADMINISTRATION OF LAWS**  
[Pen. Code § 182(5)], in that said defendants did willfully and unlawfully conspire with one  
another, and with other persons, to commit the crimes of Grand Theft, to Cheat and Defraud the  
Medi-Cal Program, Health Benefits Fraud, Medi-Cal Fraud, and to commit an Act Injurious to  
Public Health and Morals and the Due Administration of Laws, in violation of Penal Code,  
sections 182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welfare and Institutions

1 Code, section 14107, a felony, by:

2 (1) unlawfully advertising to pay “rebates” to Medi-Cal beneficiaries and “new  
3 patients” who “complete” all treatment recommended by persons employed at Hatch  
4 Dental, and

5 (2) unlawfully paying “rebates” to such Medi-Cal beneficiaries in the form of gift  
6 certificates to Food-4-Less and Raley’s Food Stores, and free sweatshirts and electric  
7 toothbrushes, and

8 (3) unlawfully performing unnecessary dental procedures, and

9 (4) unlawfully causing clerical staff to fabricate periodontal gum probing charts  
10 which were sent to Delta Dental, the fiscal intermediary for the Medi-Cal Dental  
11 Program, to fraudulently obtain preauthorization to perform subgingival curettage and  
12 root planing procedures, and

13 (5) unlawfully causing claims to be sent to the Medi-Cal Dental program for the  
14 performance of subgingival curettage and root planing procedures which were never  
15 performed or only partially performed, and

16 (6) unlawfully using the name and identity of another dentist to obtain a Medi-Cal  
17 Provider number to facilitate continued billing for services rendered to Medi-Cal patients  
18 treated at Hatch Dental after Hatch Dental was notified that its privilege to participate in  
19 the Medi-Cal Dental Program had been suspended, and

20 (7) unlawfully using the billing provider number of such dentist to fraudulently  
21 obtain reimbursement for services rendered to Medi-Cal recipients, and

22 (8) telling dental assistants to perform dental procedures that can only be  
23 performed by a licensed dentist, and

24 (9) billing the Medi-Cal Dental program and private insurance companies for  
25 procedures that were not performed; and

26 (10) using the identities of Medi-Cal beneficiaries to bill for office visits that  
27 never occurred and for non-existent procedures purportedly performed during such  
28 phantom office visits; and

1 (11) unlawfully reusing dental instruments without sterilizing them before use on  
2 a new patient, and

3 (12) unlawfully developing treatment plans calling for unnecessary dental  
4 surgeries, and

5 (13) unlawfully performing unnecessary dental surgeries, to wit root canals which  
6 are performed by removing the nerve of the tooth, thereby depriving the tooth of nutrients  
7 necessary to permit the tooth to remain a living structure, and

8 (14) unlawfully performing unnecessary dental surgeries, to wit fillings, on  
9 healthy virgin teeth that had no carious lesions, placing patients at risk of subsequent  
10 pain, infection and tooth loss, and

11 (15) unlawfully performing excessive numbers of dental surgeries in a single  
12 session, causing extreme pain and discomfort, and

13 (16) unlawfully forcibly restraining children in dental operatories, and

14 (17) unlawfully performing unnecessary dental surgeries on patients without first  
15 considering the patient's medical history and condition and without consulting the  
16 patient's physician to identify appropriate safeguards that must be taken to protect the  
17 patient against risk of great bodily harm and death, and

18 (18) unlawfully performing dental surgeries without first obtaining an updated  
19 health history, and

20 (19) unlawfully failing to treat the most serious actual and existing dental  
21 pathology (e.g., seriously diseased teeth) which needs immediate care to protect the  
22 patient from pain, infection and the possible loss of one or more teeth, in order to perform  
23 excessive numbers of unnecessary shallow occlusal fillings which generate more money  
24 in insurance billings while concomitantly placing the patient at risk of infection and more  
25 invasive treatment, and

26 (20) unlawfully placing fillings which do not penetrate the dentino-enamel  
27 junction, and are too thin and are at risk for premature breakage, and

28 //

1 (21) unlawfully performing dental surgeries with inadequate amounts of  
2 anesthetic, and

3 (22) unlawfully issuing prescriptions for Schedule III narcotics (e.g. Vicodin and  
4 Tylenol-3) without documenting the source and type of pain found, and without  
5 describing the reasons for the medication, and

6 (23) unlawfully performing extensive dental procedures on minors without fully  
7 disclosing the extent of the treatment to the patient's parent or guardian,

8 and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid  
9 conspiracy, the said defendants committed the following overt act or acts at and in the Counties  
10 of Stanislaus and San Joaquin:

## 11 12 OVERT ACTS

### 13 Kickbacks

- 14 1. On or about and between November 9, 1999, and December 31, 2003, and on one or  
15 more occasions, **(D02) Kin Thor PANG** placed an advertisement in publications  
16 circulated to residents in the vicinity of Ceres and Stockton, offering to pay "rebates" to  
17 Medi-Cal beneficiaries and "new patients" who "complete" all treatment recommended  
18 by persons employed at Hatch Dental.
- 19 2. On or about and between November 9, 1999, and December 31, 2003, and on one or  
20 more occasions, **(D02) Kin Thor PANG** offered "rebates" to new Medi-Cal patients and  
21 private insurance patients who "completed" all treatment recommended by persons  
22 employed at Hatch Dental, in the form of gift certificates to Food-4-Less and Raley's  
23 Food Stores, free sweatshirts and free electric toothbrushes.

### 24 Unlicensed Practice of Dentistry

- 25 3. On or about and between August 1, 2000 and April 30, 2001, and on one or more  
26 occasions, **(D01) Kyon Maung TEO**, **(D07) Eduardo Sabater GERODIAS**, and **(D13)**  
27 **Sang Hyuk PARK**, told Maria Hernandez, a registered dental assistant employed at  
28 Hatch Dental on Hatch Road in Ceres (Hatch1), to perform duties Hernandez was not  
licensed to perform, including: performing coronal polishing of teeth, cementing  
temporary and permanent crowns, and taking impressions for the fabrication of  
permanent partial dentures.
4. On or about and between January 1, 2002, and December 31, 2003, and on one or more  
occasions, **(D01) Kyon Maung TEO**, told Yovania Mercedes Ochoa, a dental assistant  
employed at Hatch Dental on Hatch Road in Ceres (Hatch1), to perform duties Ochoa  
was not legally permitted to perform, which included performing coronal polishing of  
teeth.

- 1 5. On or about and between January 1, 2002, and December 31, 2003, and on one or more  
2 occasions, **(D03) Steve Sangmoon AHN, (D04) Hoon Young CHANG, and (D11)**  
3 **Rahim MESBAH**, told Yovania Mercedes Ochoa, a dental assistant employed at Hatch  
4 Dental on Hatch Road in Ceres (Hatch1), to perform duties Ochoa was not licensed to  
5 perform, which included performing coronal polishing of teeth because they did not have  
6 time to perform the coronal polishing and it was "a dental assistant's job."
- 7 6. On or about and between November 9, 1999, and December 31, 2003, and on one or  
8 more occasions, **(D01) Kyon Maung TEO**, told one or more dental assistants who did  
9 not possess coronal polishing certificates, to perform coronal polishing procedures on  
10 patients.

#### 11 **Unnecessary Dental Treatment in General**

- 12 7. On or about and between, November 9, 1999, and December 31, 2003, and on one or  
13 more occasions, a treatment plan that called for unnecessary dental surgeries was  
14 developed by the following defendants:  
15 **(D01) Kyon Maung TEO,**  
16 **(D03) Steve Sangmoon AHN,**  
17 **(D07) Eduardo Sabater GERODIAS,**  
18 **(D11) Rahim MESBAH,**  
19 **(D14) Luis Alexandrino PINTO,**  
20 **(D15) Rudolfo Poscablo RAVANERA,**  
21 **(D16) Benham ROSTAMI,**  
22 **(D17) Williams Defreitas SARAIVA, and**  
23 **(D19) Tri Duy VU,**
- 24 8. On or about and between July 1, 2003 and July 31, 2003, and on one or more occasions,  
25 **(D01) Kyon Maung TEO**, performed an unnecessary root canal treatment on a patient  
26 tooth when only a small filling was needed to treat the patient's dental condition.
- 27 9. On or about and between December 16, 2002, and January 31, 2003, **(D01) Kyon Maung**  
28 **TEO**, after Ranjivendra Nath, DDS, completed a diagnosis and treatment plan on a 45  
year-old male and determined no treatment was necessary, **TEO** changed Rath's  
treatment plan to recommend composite restorations for two to three lower anterior teeth.
- 10 10. On or about and between November 9, 1999, and December 31, 2003, and on one or  
11 more occasions, **(D01) Kyon Maung TEO** drilled into a tooth that was only stained and  
12 had no cavities and then placed a filling into the drilled hole.
- 13 11. On or about and between December 1, 2000, and December 31, 2000, and on one or more  
14 occasions, **(D01) Kyon Maung TEO** drilled into a deciduous tooth (commonly called a  
15 primary or "baby" tooth) that was only stained and had no cavities, and then placed a  
16 filling into the drilled hole.
- 17 12. On or about and between November 9, 1999, and December 31, 2003, and on one or  
18 more occasions, **(D01) Kyon Maung TEO** told one or more dentists in his employ to be  
19 "very aggressive" in their diagnosis of cavities.
- 20 13. On or about and between November 9, 1999, and December 31, 2003, and on one or  
21 more occasions, **(D01) Kyon Maung TEO** instructed one or more dentists in his employ  
22 "if there is any possible indication there is a lesion, or defect in the [patient's] tooth to put  
23 a filling in it".

- 1 14. On or about and between December 1, 2000, and December 31, 2000, after Bahman  
2 Edalati, DMD, refused to drill into teeth that were merely stained and did not contain any  
3 cavities, **(D01) Kyon Maung TEO** said Hatch Dental "is not a dental school and if you  
4 do not perform fillings, you can get into trouble later on."
- 5 15. On or about and between March 1, 2002, and May 31, 2002, **(D01) Kyon Maung TEO**,  
6 told Alfred B. DeLa Cruz, DDS, that when patients come into the dental office for dental  
7 treatment, they expect to receive dental treatment, and when his dentists perform a lot of  
8 fillings that makes the patients happy and that also makes **TEO** very happy.
- 9 16. On or about and between March 1, 2002, and May 31, 2002, in response to the statement  
10 of Alfred B. DeLa Cruz, DDS, that he was thinking about opening his own practice in the  
11 East Bay area, **(D02) Kin Thor PANG** said "if you work at Hatch Dental for five days a  
12 week, you would earn so much money you would be able to retire within a couple years .  
13 . . it's all about the money."
- 14 17. On or about and between January 30, 2002, and February 28, 2002, after Tarlochan  
15 Singh, DDS, told **(D01) Kyon Maung TEO** that forcing an explorer-tip into the occlusal  
16 grooves causing the tip to stick did not indicate a carious lesion (or cavity), **TEO** said he  
17 diagnosed cavities in that manner because "it is so hard to make a living by practicing  
18 dentistry these days" and he was showing Singh how to survive by making a living at  
19 practicing dentistry.
- 20 18. On or about and between January 30, 2002, and February 28, 2002, after Tarlochan  
21 Singh, DDS, told **(D01) Kyon Maung TEO** that he should not be diagnosing  
22 unnecessary treatment and it would catch up with Teo some day, **TEO** said the reason he  
23 diagnosed cavities on the occlusal and buccal surfaces of the mandibular teeth, and on the  
24 occlusal and lingual surfaces on the maxillary teeth, is that it cannot be determined  
25 whether or not the carious lesions exist on these surfaces by examining the patients'  
26 radiographs and that anyone who reviews the radiographs from his dental office will not  
27 be able to prove that a carious lesion did not exist.
- 28 19. On or about and between February 1, 2002, and May 31, 2002, **(D01) Kyon Maung TEO**  
told Ky Q. Ha, DDS, that Ha's treatment plans were too conservative and **TEO** was  
concerned about the manner in which Ha made "observe" or "watch" notations on charts  
of patients who were under 18 years of age.
- 20 20. On or about and between February 1, 2002, and May 31, 2002, and on one or more  
occasions, after Ky Q. Ha, DDS, wrote "watch" on a treatment plan or diagnosed the  
need for a sealant to be placed on the occlusal surfaces of teeth with some imperfections,  
21 **(D01) Kyon Maung TEO** said to Ha "You won't make any money by noting "observe"  
22 or "watch" on the charts, or by recommending sealants."
- 23 21. On or about and between February 1, 2002, and May 31, 2002, and on one or more  
occasions, **(D01) Kyon Maung TEO**, altered a treatment plan performed by Ky Q. Ha,  
24 DDS, by adding unnecessary treatment and requesting Ha to perform it.
- 25 22. On or about and between February 1, 2002, and April 20, 2002, after Brian Kanarek,  
26 DDS, spoke to **(D01) Kyon Maung Teo** about Teo's "habit of over-diagnosing dental  
treatment for the patients at Hatch Dental," **TEO** replied "Something has to pay for this  
dental practice."
- 27 23. On or about and between February 1, 2002, and April 20, 2002, after Brian Kanarek,  
28 DDS, told **(D01) Kyon Maung TEO** that he had only diagnosed the need for 2 fillings  
for a patient for whom **TEO** had diagnosed the need for 26 fillings, **TEO** told Kanarek to  
leave Hatch Dental "and don't come back."

- 1 24. On or about and between, January 1, 2002, and June 30, 2002, and on one or more  
2 occasions, in a treatment plan presented to Huzaifa H. Maloo, DDS, **(D01) Kyon Maung**  
3 **TEO** unnecessarily diagnosed a tooth as requiring a filling when the tooth contained a  
4 buccal pit which was smaller than what could be removed with a 557 bur (the smallest  
5 dental bur), and which was too small to drill and fill.
- 6 25. On or about and between, January 1, 2002, and June 30, 2002, after Huzaifa H. Maloo,  
7 DDS, had been employed at Hatch Dental for about three months and had refused to  
8 perform dental procedures that he identified as unnecessary, **(D02) Kin Thor PANG**  
9 telephoned Maloo, on his day off and told Maloo not to come back to work at Hatch  
10 Dental because Maloo was not producing enough work and because other dentists were  
11 performing more dental procedures than Maloo was performing.
- 12 26. On or about and between March 13, 2002, and May 31, 2002, Alfred B. DeLa Cruz,  
13 DDS, brought a patient chart to **(D04) Hoon Young CHANG**, and asked "Why did you  
14 give this patient 28 fillings in a single dental appointment?" and **CHANG** said "It's all  
15 about the money."

#### 16 **Unnecessary Dental Surgeries on Healthy Virgin Teeth**

- 17 27. On or about and between, November 9, 1999, and December 31, 2003, and on one or  
18 more occasions, **(D01) Kyon Maung TEO**, performed unnecessary dental surgeries, to  
19 wit, fillings, on healthy virgin teeth that had no carious lesions, which placed the patient  
20 at subsequent risk of pain, infection and tooth loss, when treating *Vannalee T.*, *Emilano*  
21 *C.*, *Juan C., Jr.*, *Elisa V.*, *Angelica P.*, and other patients at Hatch Dental.
- 22 28. On or about and between, November 9, 1999, and December 31, 2003, and on one or  
23 more occasions, unnecessary dental surgeries, to wit, fillings, on healthy virgin teeth that  
24 had no carious lesions, which placed the patient at subsequent risk of pain, infection and  
25 tooth loss, were performed by the following defendants:  
26 **(D03) Steve Sangmoon AHN,**  
27 **(D04) Hoon Young CHANG,**  
28 **(D05) Wen Hsiang CHOU,**  
**(D06) Anthony Halili GALVAN,**  
**(D07) Eduardo Sabater GERODIAS,**  
**(D08) Shahry Baradaran HASHEMI,**  
**(D09) Keith Yoshikazu KOMAKI,**  
**(D10) Ricky Hung-Tak LAM,**  
**(D11) Rahim MESBAH,**  
**(D12) Duc Sy NGUYEN,**  
**(D13) San Hyuk PARK,**  
**(D14) Luis Alexandrino PINTO,**  
**(D15) Rudolfo Poscablo RAVANERA,**  
**(D16) Benham ROSTAMI,**  
**(D17) Williams Defreitas SARAIVA,**  
**(D18) Seyed Mohammad TARIFARD,**  
**(D19) Tri Duy VU,**  
**(D20) Shiyu WANG, and**  
**(D21) Faruk Cenap YETEK,**
- 29 29. On or about July 19, 2001, **(D10) Ricky Hung-Tak LAM**, examined *Wendy B.*, and  
developed a treatment plan to perform unnecessary dental surgeries, to wit, fillings, on  
healthy virgin teeth that had no carious lesions, to replace fillings that did not require  
replacement, and to perform an unnecessary root canal.



**Charting and Billing for Services Not Performed**

30. On or about and between November 9, 1999, and December 31, 2003, and on one or more occasions, **(D01) Kyon Maung TEO** told one or more dentists in his employ to "pad the patient's chart with unperformed procedures – especially fillings."
31. On or about and between, May 1, 2002, and October 15, 2003, and on one or more occasions, **(D03) Steve Sangmoon AHN**, made an entry in a patient's chart indicating that he performed a dental service that he had not actually performed, knowing that the chart entry would be used to bill the Medi-Cal Dental Program for that treatment, and that he would receive a percentage of the insurance proceeds from that billing.
32. On or about and between, November 9, 1999, and October 23, 2003, and on one or more occasions, an entry in a patient's chart indicating that he performed a dental service that he had not actually performed, knowing that the chart entry would be used to bill the Medi-Cal Dental Program for that treatment, and that he would be paid a percentage of the insurance proceeds from that billing, was made by the following defendants:  
**(D04) Hoon Young CHANG,**  
**(D10) Ricky Hung-Tak LAM,**  
**(D14) Luis Alexandrino PINTO,**  
**(D16) Benham ROSTAMI, and**  
**(D19) Tri Duy VU.**
33. On or about and between March 1, 2002, and May 31, 2002, after examining a patient who had previously been treated by **(D04) Hoon Young CHANG**, a dentist employed by Hatch Dental, Alfred B. DeLa Cruz, DDS, told **(D01) Kyon Maung TEO** he noticed some of the dental procedures that were documented as having been performed by **CHANG**, had not been performed, and **TEO** said "Keep it quiet . . . don't make any mention of it."
34. On or about and between August 1, 2001, and December 31, 2003, **(D02) Kin Thor PANG** told Sachinthavy Keo, who was employed as a Denti-Cal Billing Clerk at Hatch Dental on Hatch Road in Ceres (Hatch1), to ask **PANG** any questions Keo had about Denti-Cal billing rather than looking in the Denti-Cal provider manual because **PANG** was an expert in Denti-Cal billing.
35. On or about and between August 1, 2001, and December 31, 2003, **(D02) Kin Thor PANG** told Sachinthavy Keo, who was employed as a Denti-Cal Billing Clerk at Hatch Dental on Hatch Road in Ceres (Hatch1), to double check patient charts before completing the billing and if a filling had been replaced in less than two years, to bill for an emergency office visit (Proc Code 9110) rather than the replacement filling because Denti-Cal would not pay for the replacement within a two-year time period.
36. On or about and between August 1, 2001, and October 17, 2002, and on one or more occasions, **(D02) Kin Thor PANG** told Medi-Cal Biller Sachinthavy Keo to change the date of service on a claim to a fraudulent date of service when the patient was eligible for Medi-Cal benefits so that Hatch Dental would receive payment for the treatment.
37. On or about and between October 17, 2002, and December 31, 2003, and on one or more occasions, **(D02) Kin Thor PANG** approached Kevin Prasad, who was employed at Hatch Dental on Hatch Road in Ceres (Hatch1) through September 2003 as a Denti-Cal Billing Clerk, after which he was transferred to Hatch Dental on Oakdale Road in Modesto (Hatch3), and told Prasad to rewrite a patient's Denti-Cal claim substituting a procedure code that was not performed for the code for the procedure actually performed.

- 1 38. On or about and between August 1, 2001, and October 17, 2002, and on one or more  
2 occasions, **(D02) Kin Thor PANG** told Denti-Cal Billing Clerk Kevin Prasad to change  
3 the date of service on a claim to a fraudulent date of service when the patient was eligible  
4 for Medi-Cal benefits so that Hatch Dental would receive payment for the treatment.
- 5 39. On or about and between August 2, 2000, and August 30, 2001, and on one or more  
6 occasions, **(D02) Kin Thor PANG** caused Andrea Victoria Amaro, who was employed  
7 as a Medi-Cal Biller at Hatch Dental on Hatch Road in Ceres (Hatch1), to submit claims  
8 to the Medi-Cal Dental Program for Nitrous Oxide for a Denti-Cal patient who was not  
9 given nitrous oxide.
- 10 40. On or about and between November 9, 1999, and December 31, 2003, and on one or  
11 more occasions, **(D02) Kin Thor PANG** caused the Medi-Cal Dental Program to be  
12 billed for current dental treatment on a Medi-Cal beneficiary who had not been seen or  
13 treated at Hatch Dental for numerous months.
- 14 41. On or about and between August 2, 2000, and August 9, 2001, after Andrea Victoria  
15 Amaro told **(D02) Kin Thor PANG** that Amaro was uncomfortable with claims being  
16 sent to the Medi-Cal Dental Program for dental treatment that did not occur, **PANG** told  
17 Amaro "what happens here, stays here" and told Amaro not to talk to anyone else about  
18 the extra charges **PANG** was submitting to the Denti-Cal Program.
- 19 42. On or about and between August 2, 2000, and August 9, 2001, after **(D02) Kin Thor**  
20 **PANG** told Andrea Victoria Amaro not to talk to anyone about the extra charges **PANG**  
21 was submitting to the Denti-Cal Program, **(D01) Kyon Maung TEO** approached Andrea  
22 Victoria Amaro and said "what happens here, stays here."
- 23 43. On or about and between November 9, 1999, and December 31, 2003, and on one or  
24 more occasions, **(D01) Kyon Maung TEO** and **(D02) Kin Thor PANG** caused a  
25 fluoride treatment to be billed to the Medi-Cal Dental Program when Hatch Dental did  
26 not stock fluoride and the treatment could not have been performed.
- 27 44. On or about and between November 9, 1999, and December 31, 2003, and on one or  
28 more occasions, **(D01) Kyon Maung TEO** and **(D02) Kin Thor PANG** billed, or caused  
to be billed to the Medi-Cal Dental Program a more expensive level of service when a  
lower and less expensive level of service was actually provided – a billing technique  
which is commonly referred to as "upcoding".
45. On or about and between April 15, 2001, and June 30, 2001, and on one or more  
occasions, after reviewing a dental claim completed by Janice Ruth Wilder, **(D02) Kin**  
**Thor PANG** returned the claim to Wilder and told her to fraudulently bill for dental  
procedures which were not included in the patient's dental chart.
46. On or about and between April 15, 2001, and June 30, 2001, and on one or more  
occasions, after reviewing a Denti-Cal claim completed by Janice Ruth Wilder that only  
billed for the x-rays actually taken, **(D02) Kin Thor PANG** returned the claim to Wilder  
and told her to bill for full mouth x-rays and also told Wilder to always bill the Medi-Cal  
Dental Program for full mouth x-rays on a patient, even if full mouth x-rays were not  
taken for that patient.
47. On or about and between January 1, 2001, and August 15, 2001, and on one or more  
occasions, **(D02) Kin Thor PANG** told Tanya Marie Camacho to bill Denti-Cal for  
services which were never performed.

- 1 48. On or about and between January 1, 2001, and August 15, 2001, after Tanya Marie  
2 Camacho advised **(D02) Kin Thor PANG** that an office visit she was billing for never  
3 happened because the patient did not come into Hatch Dental on that day, Pang said "Yes,  
4 this is an office visit."  
5  
6 49. On or about and between November 9, 1999, and December 31, 2003, and on one or  
7 more occasions, after a patient walked into Hatch Dental to cancel a dental appointment  
8 which had been previously calendared that day, **(D02) Kin Thor PANG** caused a claim  
9 to be sent to the Medi-Cal Dental Program billing for services never rendered to that  
10 patient.  
11  
12 50. On or about and between November 9, 1999, and December 31, 2003, and on one or  
13 more occasions, after a patient failed to return to Hatch Dental for their scheduled dental  
14 treatment, **(D02) Kin Thor PANG** caused a claim to be sent to the Medi-Cal Dental  
15 Program billing for services never rendered to that patient.  
16  
17 51. On or about and between November 9, 1999, and December 31, 2003, and on one or  
18 more occasions, after a patient walked out of Hatch Dental stating they had been waiting  
19 too long for treatment, **(D02) Kin Thor PANG** caused a claim to be sent to the Medi-Cal  
20 Dental Program billing for services never rendered to that patient.  
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22

23 **Fraudulent Billing for Subgingival Curettage and Root Planing (Procedure Code 452)**

- 24 52. On or about and between, January 29, 2001, and January 13, 2003, and on one or more  
25 occasions, **(D07) Eduardo Sabater GERODIAS**, and **(D11) Rahim MESBAH**  
26 developed a treatment plan that called for the performance of procedure code section 452  
27 (subgingival curettage and root planing) without taking periodontal probing  
28 measurements and without identifying the existence of any other periodontal diagnosis  
needed to determine the necessity of the treatment.  
53. On or about and between November 9, 1999, and December 31, 2003, and on one or  
more occasions, **(D01) Kyon Maung TEO** and **(D02) Kin Thor PANG** caused  
unlicensed employees at Hatch Dental on Hatch Road in Ceres (Hatch 1), to look at a  
patient's full mouth x-rays and fabricate a chart of periodontal probing numbers for that  
patient.  
54. On or about and between April 15, 2001, and June 30, 2001, and on one or more  
occasions, **(D02) Kin Thor PANG** caused an employee named "Lizette" to approach  
Janice Ruth Wilder, who had been hired to work as a Denti-Cal biller at Hatch Dental on  
Hatch Road in Ceres (Hatch1), and show Wilder how to create periodontal pocket charts  
for all patients over 18 years of age.  
55. On or about and between August 2, 2000, and August 9, 2001, and on one or more  
occasions, **(D02) Kin Thor PANG** asked Andrea Victoria Amaro, who had been hired to  
work as a Denti-Cal biller at Hatch Dental on Hatch Road in Ceres (Hatch 1), to  
fabricate periodontal pocket depths on a patient's periodontal chart by recording small  
numbers for the patient's anterior teeth and large numbers for the patient's posterior teeth.  
56. On or about and between August 2, 2000, and August 9, 2001, and on one or more  
occasions, **(D02) Kin Thor PANG** asked Andrea Victoria Amaro, to fraudulently copy  
the measurements listed on the example of the completed periodontal chart, contained in  
a white plastic instruction binder, to actual patient charts.

- 1 57. On or about and between August 2, 2000, and August 9, 2001, and on one or more  
2 occasions, **(D02) Kin Thor PANG** told Andrea Victoria Amaro to create fraudulent  
periodontal charts for all Medi-Cal patients over 18 years of age.
- 3 58. On or about and between August 2, 2000, and August 9, 2001, and on one or more  
4 occasions, **(D02) Kin Thor PANG** told Andrea Victoria Amaro to complete a Treatment  
5 Authorization Request (TAR) form for all Medi-Cal patients over 18 years of age for  
6 whom Amaro had created a fraudulent periodontal chart..
- 7 59. On or about and between August 2, 2000, and August 9, 2001, on one or more occasions,  
8 **(D02) Kin Thor PANG** told Andrea Victoria Amaro to mail a patient's fraudulent TAR  
9 and periodontal chart to the Denti-Cal Program to obtain authorization to perform a  
10 subgingival curettage and root planing procedure for the patient.
- 11 60. On or about and between August 2, 2000, and August 9, 2001, and on one or more  
12 occasions, after receiving permission from the Denti-Cal Program to perform a  
13 subgingival curettage and root planing procedure for the patient based upon fraudulent  
14 submissions indicating its necessity, **(D02) Kin Thor PANG** told Andrea Victoria Amaro  
15 to telephone the patient and schedule an appointment for that procedure.
- 16 61. On or about and between November 9, 1999, and December 31, 2003, and on one or  
17 more occasions, **(D01) Kyon Maung TEO** and **(D02) Kin Thor PANG** caused  
18 unlicensed employees at Hatch Dental in Stockton (Hatch 2) to look at a patient's full  
19 mouth x-rays and fabricate a chart of periodontal probing numbers for that patient.
- 20 62. On or about and between January 1, 2000, and December 31, 2001, and on one or more  
21 occasions, **(D02) Kin Thor PANG** approached Maria Socorro Gonzales, who had been  
22 hired to work as a Denti-Cal biller at Hatch Dental on Sacramento Road in Stockton  
(Hatch 2), and told Gonzales to fraudulently complete periodontal pocket charts for all  
23 patients over 18 years of age.
- 24 63. On or about and between January 1, 2000, and December 31, 2001, and on one or more  
25 occasions, **(D02) Kin Thor PANG** told Maria Socorro Gonzales to record periodontal  
26 pocket depths as five millimeters or greater if she thought the pocket depths appeared  
27 larger than usual in a patient's full mouth x-rays, even though that was not the proper  
28 method of determining pocket depth and Gonzales was unqualified to make such  
determinations.
64. On or about and between January 1, 2000, and December 31, 2001, and on one or more  
occasions, **(D02) Kin Thor PANG** told Maria Socorro Gonzales to fraudulently complete  
a Treatment Authorization Request (TAR) and to submit the TAR and the fraudulent  
Periodontal Pocket Chart to the Medi-Cal Dental Program and request authorization of  
the subgingival curettage and root planing procedure for all patients over 18 years of age.
65. On or about and between January 1, 2000, and December 31, 2001, and on one or more  
occasions, **(D02) Kin Thor PANG** told Maria Socorro Gonzales to schedule Medi-Cal  
beneficiaries for an appointment once Gonzales received authorization from the Medi-Cal  
Dental Program to perform the subgingival curettage and root planing procedure based on  
fraudulent submissions.
66. On or about and between January 1, 2000, and December 31, 2001, and on one or more  
occasions, **(D02) Kin Thor PANG** told Maria Socorro Gonzales to use the completed  
periodontal chart contained in a white plastic instruction binder as a guide for recording  
fraudulent pocket depths on the periodontal charts of actual patients .

- 1 67. On or about and between February 25, 2002, and May 31, 2002, and on one or more  
2 occasions, **(D02) Kin Thor PANG** approached Kao Pa Vang, who had been hired to  
3 work as a Denti-Cal biller at Hatch Dental on Sacramento Road in Stockton (Hatch 2),  
4 whose sole duty was to submit Denti-Cal claims to the Medi-Cal Dental Program for  
5 patients treated at Hatch 2, and told Vang to fraudulently complete periodontal pocket  
6 charts for all patients over 18 years of age.
- 7 68. On or about and between January 1, 2001, and August 15, 2001, and on one or more  
8 occasions, **(D02) Kin Thor PANG** approached Tanya Marie Camacho, who had been  
9 hired to work as a Denti-Cal biller at Hatch Dental on Sacramento Road in Stockton  
10 (Hatch2), and told Camacho it was Camacho's responsibility to perform periodontal  
11 pocket charting for the patients at Hatch Dental even though she was unqualified to do so.
- 12 69. On or about and between January 1, 2001, and August 15, 2001, and on one or more  
13 occasions, **(D02) Kin Thor PANG** told Tanya Marie Camacho to hold a full mouth x-ray  
14 up to a light source and study the x-ray in an attempt to estimate the patient's periodontal  
15 pocket depths, even though that was not the proper method of determining pocket depth  
16 and Camacho was unqualified to make such determinations.
- 17 70. On or about and between January 1, 2001, and August 15, 2001, and on one or more  
18 occasions, **(D02) Kin Thor PANG** told Tanya Marie Camacho to record Camacho's  
19 estimation of periodontal pocket depths by writing five and six millimeter pocket depths,  
20 even though that was not the proper method of determining pocket depth and Gonzales  
21 was unqualified to make such determinations.
- 22 71. On or about and between January 1, 2001, and August 15, 2001, and on one or more  
23 occasions, **(D02) Kin Thor PANG** told Tanya Marie Camacho to fraudulently create a  
24 periodontal pocket chart to justify "deep scaling and root planing" (technically referred to  
25 as "subgingival curettage and root planing") for every patient who was over 18.
- 26 72. On or about and between November 9, 1999, and December 31, 2003, and on one or  
27 more occasions, **(D02) Kin Thor PANG** caused a fraudulent claim to be sent to the  
28 Medi-Cal Dental Program for a subgingival curettage and root planing procedure that was  
never performed because the patient never returned to Hatch Dental for the treatment.
73. On or about and between May 1, 2002, and October 15, 2003, and on one or more  
occasions, **(D01) Kyon Maung TEO** told **(D03) Steven Sangmoon AHN** not to take  
more than 20 minutes to perform a subgingival curettage and root planing procedure  
(Denti-Cal Procedure number 452) even though 20 minutes is inadequate time to perform  
that procedure.
74. On or about and between May 1, 2002, and October 15, 2003, and on one or more  
occasions, **D03 Steven Sangmoon AHN**, made a note in a patient's chart that  
fraudulently indicated he performed a subgingival curettage and root planing procedure  
knowing that the treatment he rendered to the patient was insufficient and did not  
comprise the required elements of that procedure.
75. On or about and between November 9, 1999, and December 31, 2003, and on one or  
more occasions, the following defendants made an entry in a patient's chart indicating  
that they performed a subgingival and curettage and root planing procedure without  
actually rendering the treatment to the patient, knowing that the chart entry would be used  
to fraudulently bill the Medi-Cal Dental Program for that treatment:  
**(D01) Kyon Maung TEO,**  
**(D03) Steve Sangmoon AHN,**  
**(D04) Hoon Young CHANG,**  
**(D11) Rahim MESBAH.**

1 76. On or about and between, July 1, 2000, and August 14, 2003, and on one or more  
2 occasions, **(D05) Wen Hsiang CHOU** made a note in a patient's chart that fraudulently  
3 indicated he performed a subgingival curettage and root planing procedure knowing that  
4 the treatment he rendered to the patient was insufficient and did not comprise the required  
elements of that procedure.

#### 5 **Claims Laundering**

6 77. On or about March 12, 2003, after receiving notification of possible suspension from the  
7 Medi-Cal Dental Program, **(D02) Kin Thor PANG** telephoned Paul W. Kan, DDS, and  
asked Kan to become a business partner with **PANG** and **TEO** for the purpose of  
rendering dental treatment to Medi-Cal recipients.

8 78. On or about March 12, 2003, after receiving notification of possible suspension from the  
9 Medi-Cal Dental Program, **(D02) Kin Thor PANG** told Paul W. Kan, DDS, she wanted  
10 Kan to become a partner with her because she wanted to use Kan's Medi-Cal Provider  
11 number because it would be easier for her to process claims through the Medi-Cal Dental  
Program.

12 79. On or about and between March 1, 2003, and May 19, 2003, after receiving notification  
13 of possible suspension from the Medi-Cal Dental Program, **(D01) Kyon Maung TEO**  
and **(D02) Kin Thor PANG** entered into an agreement with Paul W Kan, DDS, to pay  
him \$6,000 per month for the use of his Medi-Cal provider number.

#### 14 **Altering Patient Records**

15 80. On or about July 10, 2003, after **(D01) Kyon Maung TEO** had been temporarily  
16 excluded from participation in the Medi-Cal Dental Program, **(D02) Kin Thor PANG**  
17 fraudulently altered (and caused to be altered) a Medi-Cal beneficiary's patient record by  
changing the name of the rendering provider from **TEO** (who actually treated the patient)  
18 to Paul W. Kan, DDS, in violation of Penal Code section 471.5.

19 81. On or about and between September 1, 2001, and December 31, 2003, and on one or  
20 more occasions, **(D02) Kin Thor PANG** approached Alicia Heredia, who was employed  
at Hatch Dental on Hatch Road in Ceres (Hatch1) as a receptionist, handed Heredia a  
21 patient chart, and told her to change a procedure code which had been denied payment by  
an insurance provider and to fraudulently re-bill it under a different procedure code.

22 82. On or about and between September 1, 2001, and December 31, 2003, and on one or  
23 more occasions, **(D02) Kin Thor PANG** approached receptionist Alicia Heredia, handed  
Heredia a patient chart and told Heredia to fraudulently change the procedure code from  
24 the actual one performed which the patient's insurance company would not reimburse, to  
an emergency office visit procedure code which would be reimbursed.

#### 25 **Private Insurance Fraud**

26 83. On or about and between August 1, 2001, and December 31, 2003, **(D02) Kin Thor**  
27 **PANG** told Susana Maria Sousa, who was employed as a Private Insurance Billing Clerk  
at Hatch Dental on Hatch Road in Ceres (Hatch1), to double check patient charts before  
28 completing the billing to see if the same tooth and surface had already been billed within  
a certain scope of frequency, and if so, to bill for an emergency office visit (Proc Code  
9110) rather than the actual treatment rendered.

1 **Performing Treatment Without Full Disclosure and Patient Consent**

- 2 84. On or about and between February 1, 2002, and April 20, 2002, and on one or more  
3 occasions, **(D01) Kyon Maung TEO**, advised the parent of a minor child that the child  
4 would need a "few fillings" and instead performed double-digit numbers of fillings on  
5 that minor patient.
- 6 85. On or about and between December 1, 2001, and December 31, 2003, and on one or more  
7 occasions, **(D03) Steve Sangmoon AHN**, **(D04) Hoon Young CHANG**, and **(D11)**  
8 **Rahim MESBAH**, placed multiple fillings in a patient's mouth without first obtaining  
9 the patient's permission.
- 10 86. On or about and between, November 9, 1999, and December 31, 2003, and on one or  
11 more occasions, **(D01) Kwon Maung TEO** performed dental treatment on a patient  
12 without fully disclosing the treatment plan being proposed and without obtaining full  
13 consent of the patient and the patient's guardian.
- 14 87. On or about and between, January 29, 2001, and November 29, 2001, and on one or more  
15 occasions, **(D07) Eduardo Sabater GERODIAS** performed dental treatment on a patient  
16 without fully disclosing the treatment plan being proposed and without obtaining full  
17 consent of the patient and the patient's guardian.
- 18 88. On or about and between, September 22, 2001, and January 13, 2003, and on one or more  
19 occasions, **(D11) Rahim MESBAH** performed dental treatment on a patient without fully  
20 disclosing the treatment plan being proposed and without obtaining full consent of the  
21 patient and the patient's guardian.
- 22 89. On or about and between, October 6, 2001, and February 8, 2002, and on one or more  
23 occasions, **(D19) Tri Duy VU** performed dental treatment on a patient without fully  
24 disclosing the treatment plan being proposed and without obtaining full consent of the  
25 patient and the patient's guardian.

17 **Other Acts Injurious to Public Health**

- 18 90. On or about and between January 30, 2002, and February 28, 2002, after Tarlochan  
19 Singh, DDS, told **(D02) Kin Thor PANG** that if Hatch Dental expected Singh to return  
20 to work the following week, they would have to purchase the dental instruments  
21 necessary for Singh to perform dental procedures including root canal therapies, **(D02)**  
**Kin Thor PANG** telephoned Singh and told Singh he should not come back to work at  
22 Hatch Dental anymore.
- 23 91. On or about and between February 1, 2002, and May 31, 2002, after Ky Q. Ha, DDS,  
24 advised **(D01) Kyon Maung TEO** that Ha examined a patient whose five fillings  
25 apparently fell out shortly after the fillings were placed by Hatch Dental and that the  
26 fillings should be replaced at no additional cost, **TEO** said "the fillings should not be  
27 replaced if the patient did not complain about them falling out."
- 28 92. On or about and between December 16, 2002, and January 31, 2003, **(D01) Kyon Maung**  
**TEO**, told Ranjivendra Nath, DDS, he knew that, as part of Rath's dental school training,  
he was trained to remove all the amalgam of an existing filling before he replaced the  
filling, but as part of his employment as a dentist at Hatch Dental, Rath was only  
supposed to remove the top layer of an existing amalgam filling and place a layer of  
amalgam over the existing amalgam filling.

- 1 93. On or about and between November 9, 1999, and December 31, 2003, and on one or  
2 more occasions, after diagnosing the need to replace an existing amalgam filling, **(D01)**  
3 **Kyon Maung TEO**, removed only the top surface of the filling and then covered the  
existing filling with a layer of new amalgam giving the appearance that the entire filling  
had been replaced.
- 4 94. On or about August 16, 2001, **(D10) Ricky Hung-Tak LAM** placed patient Rene A. at  
5 risk of aspiration and swallowing Sodium Hypochlorite (bleach) when he failed to use  
6 clamps to properly secure the rubber dam used during the course of performing a root  
canal.
- 7 95. On or about and between, May 1, 2002, and October 15, 2003, and on one or more  
8 occasions, **(D03) Steve Sangmoon AHN**, and **(D16) Benham ROSTAMI** performed a  
9 dental surgery with inadequate amounts of anesthetic.
- 10 96. On or about and between, March 13, 2002, and October 23, 2003, and on one or more  
11 occasions, **(D04) Hoon Young CHANG** and **(D16) Benham ROSTAMI** performed  
12 dental surgeries without first obtaining an updated health history from the patient and the  
13 patient's guardian.
- 14 97. On or about and between December 1, 2001, and December 31, 2003, and on one or more  
15 occasions, a dentist employed at Hatch Dental physically restrained a child by placing  
16 their hands over the child's mouth and pinning them to the dental chair when a child was  
17 screaming or fighting.
- 18 98. On or about and between July 1, 2003 and July 31, 2003, and on one or more occasions,  
19 **(D01) Kyon Maung TEO** treated a dental patient without sterilizing dental instruments  
20 used to treat a previous patient.
- 21 99. On or about and between July 1, 2003 and July 31, 2003, and on one or more occasions,  
22 **(D01) Kyon Maung TEO** told **(D07) Eduardo Sabater GERODIAS** to treat dental  
23 patients without sterilizing dental instruments between use with other patients.
- 24 100. On or about and between, January 29, 2001, and June 30, 2003, and on one or more  
25 occasions, **(D07) Eduardo Sabater GERODIAS**, **(D16) Benham ROSTAMI**, and  
26 **(D19) Tri Duy VU**, failed to treat the most serious actual and existing dental pathology  
27 (e.g., seriously diseased teeth) which needed immediate care to protect the patient from  
28 pain, infection and the possible loss of one or more teeth, in order to perform excessive  
numbers of unnecessary shallow occlusal fillings which generated more money in  
insurance billings while concomitantly placing the patient at subsequent risk of infection  
and more invasive treatment.
101. On or about and between, April 30, 2001, and September 18, 2001, and on one or more  
occasions, **(D10) Ricky Hung-Tak LAM** performed fillings which did not penetrate the  
dentino-enamel junction, and were too thin and at risk for premature breakage.
102. On or about and between, January 9, 2001, and April 6, 2001, and on one or more  
occasions, **(D13) Sang Hyuk PARK** performed fillings which did not penetrate the  
dentino-enamel junction, and were too thin and at risk for premature breakage.
103. On or about and between, April 6, 2002, and July 25, 2002, and on one or more  
occasions, **(D17) Williams Defreitas Saraiva** performed fillings which did not penetrate  
the dentino-enamel junction, and were too thin and at risk for premature breakage.



1 104. On or about and between, October 6, 2001, and February 8, 2002, and on one or more  
2 occasions, **(D19) Tri Duy VU** performed fillings which did not penetrate the dentino-  
3 enamel junction, and were too thin and at risk for premature breakage.

4 **COUNT 2**

5 **(Grand Theft, Pen. Code § 487)**

6 On or about or between November 9, 1999, and December 31, 2003, in the  
7 County of Stanislaus, State of California, defendants

8 **(D01) Kyon Maung TEO,**  
9 **(D02) Kin Thor PANG,**  
10 **(D03) Steve Sangmoon AHN,**  
11 **(D04) Hoon Young CHANG,**  
12 **(D05) Wen Hsiang CHOU,**  
13 **(D06) Anthony Halili GALVAN,**  
14 **(D07) Eduardo Sabater GERODIAS,**  
15 **(D08) Shahry Baradaran HASHEMI,**  
16 **(D09) Keith Yoshikazu KOMAKI,**  
17 **(D10) Ricky Hung-Tak LAM,**  
18 **(D11) Rahim MESBAH,**  
19 **(D12) Duc Sy NGUYEN,**  
20 **(D13) San Hyuk PARK,**  
21 **(D14) Luis Alexandrino PINTO,**  
22 **(D15) Rudolfo Poscablo RAVANERA,**  
23 **(D16) Benham ROSTAMI,**  
24 **(D17) Williams Defreitas SARAIVA,**  
25 **(D18) Seyed Mohammad TARIFARD,**  
26 **(D19) Tri Duy VU,**  
27 **(D20) Shiyu WANG,**  
28 **(D21) Faruk Cenap YETEK,**

19 committed the crime of **GRAND THEFT** in that said defendants did wilfully and unlawfully  
20 take property from the State of California's Medi-Cal Dental Program of a value exceeding Four  
21 Hundred Dollars (\$400), in violation of Penal Code §487(a), a felony.

22 **COUNT 3**

23 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

24 On or about or between November 9, 1999, and December 31, 2003, in the  
25 County of Stanislaus, State of California, and elsewhere, defendants **(D01) Kyon Maung TEO**  
26 and **(D02) Kin Thor Pang,** committed the crime of **HEALTH BENEFITS FRAUD** in that said  
27 defendants did commit and aid, abet, solicit, and conspire with others known and unknown, and  
28

1 did knowingly make and cause to be made false and fraudulent claims on behalf of Medi-Cal  
2 beneficiaries, for payment of a health care benefit under the Medi-Cal program, in violation of  
3 Penal Code §550(a)(6), a felony.

4  
5 **COUNT 4**

6 **(Private Insurance Health Benefits Fraud, Pen. Code § 550(a)(6))**

7 On or about or between November 9, 1999, and December 31, 2003, in the  
8 County of Stanislaus, State of California, and elsewhere, defendants **(D01) Kyon Maung TEO**  
9 and **(D02) Kin Thor Pang**, committed the crime of **HEALTH BENEFITS FRAUD** in that said  
10 defendants did commit and aid, abet, solicit, and conspire with others known and unknown, and  
11 did knowingly make and cause to be made false and fraudulent claims on behalf of patients  
12 covered by private insurance carriers, for payment of a health care benefit under the various  
13 private insurers, to wit, Cigna, GE Financial Assurance, Guardian Life, Met-Life, USI  
14 Administrators, Inc, and other private insurance carriers, in violation of Penal Code §550(a)(6), a  
15 felony.

16  
17 **COUNT 5**

18 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

19 On or about and between May 1, 2002, and October 15, 2003, in the County of  
20 Stanislaus, State of California, and elsewhere, defendant, **(D03) Steve Sangmoon AHN**,  
21 committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and  
22 aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and  
23 cause to be made false and fraudulent claims on behalf of *Nicole B., Erica C., Esteban E.,*  
24 *Janet P., Danielle T., Wendy S.*, and other Medi-Cal beneficiaries, for payment of a health  
25 care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

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**COUNT 6**

**(Private Insurance Health Benefits Fraud, Pen. Code § 550(a)(6))**

On or about and between May 1, 2002, and October 15, 2003, in the County of Stanislaus, State of California, and elsewhere, defendant, **(D03) Steve Sangmoon AHN**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and cause to be made false and fraudulent claims on behalf of *Wendy S. and Donna B.*, and other patients covered by private insurance carriers, for payment of a health care benefit, in violation of Penal Code §550(a)(6), a felony.

**COUNT 7**

**(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

On or about and between, March 13, 2002, and October 23, 2003, in the County of Stanislaus, State of California, and elsewhere, defendant, **(D04) Hoon Young CHANG**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and cause to be made false and fraudulent claims on behalf of *Ameina A., Jose G., Jessica L., Senam L., Gabriela L., and Richard V.*, and other Medi-Cal beneficiaries, for payment of a health care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

**COUNT 8**

**(Private Insurance Health Benefits Fraud, Pen. Code § 550(a)(6))**

On or about and between, March 13, 2002, and October 23, 2003, in the County of Stanislaus, State of California, and elsewhere, defendant, **(D04) Hoon Young CHANG**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and cause to be made false and fraudulent claims on behalf of *Megan B.*, and other patients covered by private insurance carriers, for payment of a health care benefit, in violation of Penal Code §550(a)(6), a felony.

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**COUNT 9**

**(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

On or about and between, July 1, 2000, and August 14, 2003, in the County of Stanislaus, State of California, and elsewhere, defendant, **(D05) Wen Hsiang CHOU**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and cause to be made false and fraudulent claims on behalf of *Rosario A., Daniel D., James G., Yvette H., Jennifer V., Silvia Y.*, and other Medi-Cal beneficiaries, for payment of a health care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

**COUNT 10**

**(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

On or about and between, December 3, 2001, and January 22, 2002, in the County of Stanislaus, State of California, and elsewhere, defendant, **(D06) Anthony Halili GALVAN**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and cause to be made false and fraudulent claims on behalf of *Jennifer G., Shelley H., Satwinder K., Alejandra M., Billy N., Somphone R., Syreeta W.*, and other Medi-Cal beneficiaries, for payment of a health care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

**COUNT 11**

**(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

On or about and between, January 29, 2001, and November 29, 2001, in the County of Stanislaus, State of California, and elsewhere, defendant, **(D07) Eduardo Sabater GERODIAS**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and cause to be made false and fraudulent claims on behalf of *Rosario A., Ameina A., Javier A.*,

1 *Rene A., Avlin D., Jose O., Lidia R.,* and other Medi-Cal beneficiaries, for payment of a  
2 health care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

3  
4 **COUNT 12**

5 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

6 On or about and between, March 7, 2003, and May 6, 2003, in the County of Stanislaus,  
7 State of California, and elsewhere, defendant, **(D08) Shahryar Baradaran HASHEMI,**  
8 committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and  
9 aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and  
10 cause to be made false and fraudulent claims on behalf of *Kyle C., Jose G., Monica H.,*  
11 *Courtney H., Sherese M.,* and other Medi-Cal beneficiaries, for payment of a health care benefit  
12 under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

13  
14 **COUNT 13**

15 **(Medi-Cal Health Benefits Fraud, Penal Code § 550(a)(6))**

16 On or about and between, August 7, 2002, and March 28, 2003, and in the furtherance of  
17 the conspiracy commenced in the County of Stanislaus, State of California, defendant, **(D09)**  
18 **Keith Yoshikazu KOMAKI,** committed the crime of **HEALTH BENEFITS FRAUD** in that  
19 said defendant did commit and aid, abet, solicit, and conspire with others known and unknown,  
20 and did knowingly make and cause to be made false and fraudulent claims on behalf of *Da*  
21 *Marcus B., Mason C., Velma C., Rashona D., Brandice J., Ginay M., Naomi S., Daniel*  
22 *S.,* and other Medi-Cal beneficiaries, for payment of a health care benefit under the Medi-Cal  
23 program, in violation of Penal Code §550(a)(6), a felony.

24  
25 **COUNT 14**

26 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

27 On or about and between, April 30, 2001, and September 18, 2001, in the County of  
28 Stanislaus, State of California, and elsewhere, defendant, **(D10) Ricky Hung-Tak LAM,**

1 committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and  
2 aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and  
3 cause to be made false and fraudulent claims on behalf of *Rene A., Emilano C., Eladio C.,*  
4 *Jose O., Sunder S., Jorge S., Latesha W.,* and other Medi-Cal beneficiaries, for payment of a  
5 health care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

6  
7 **COUNT 15**

8 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

9 On or about and between, September 22, 2001, and January 13, 2003, in the County of  
10 Stanislaus, State of California, and elsewhere, defendant, **(D11) Rahim MESBAH**, committed  
11 the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet,  
12 solicit, and conspire with others known and unknown, and did knowingly make and cause to be  
13 made false and fraudulent claims on behalf of *Peggy A., Velma C., Avlin D., Jennifer E.,*  
14 *Shannon K., Gonzallo P., Wendy S.,* and other Medi-Cal beneficiaries, for payment of a health  
15 care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

16  
17 **COUNT 16**

18 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

19 On or about and between, November 3, 2001, and March 12, 2002, in the County of  
20 Stanislaus, State of California, and elsewhere, defendant, **(D12) Duc Sy NGUYEN**, committed  
21 the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet,  
22 solicit, and conspire with others known and unknown, and did knowingly make and cause to be  
23 made false and fraudulent claims on behalf of *Andrea F., Jennifer G., Patryce G., Argia H.,*  
24 *Gregory M., Martha R., Torrie W.,* and other Medi-Cal beneficiaries, for payment of a health  
25 care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

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1 **COUNT 17**

2 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

3 On or about and between, January 9, 2001, and April 6, 2001, in the County of Stanislaus,  
4 State of California, and elsewhere, defendant, **(D13) Sang Hyuk PARK**, committed the crime of  
5 **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit, and  
6 conspire with others known and unknown, and did knowingly make and cause to be made false  
7 and fraudulent claims on behalf of *Addison D., Miranda D., Veronica G., Enrique G.,*  
8 *Leonardo G., Linda R.,* and other Medi-Cal beneficiaries, for payment of a health care benefit  
9 under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

10  
11 **COUNT 18**

12 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

13 On or about and between, February 2, 2002, and June 17, 2002, in the County of  
14 Stanislaus, State of California, and elsewhere, defendant, **(D14) Luis Alexandrino PINTO**,  
15 committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and  
16 aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and  
17 cause to be made false and fraudulent claims on behalf of *Da Marcus B., Portia B., Mary G.,*  
18 *Ibrahim M., Carlos P., Marguerite S.,* and other Medi-Cal beneficiaries, for payment of a  
19 health care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

20  
21 **COUNT 19**

22 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

23 On or about and between, October 22, 2001, and December 28, 2001, in the County of  
24 Stanislaus, State of California, and elsewhere, defendant, **(D15) Rudolfo Poscablo**  
25 **RAVANERA**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant  
26 did commit and aid, abet, solicit, and conspire with others known and unknown, and did  
27 knowingly make and cause to be made false and fraudulent claims on behalf of *Monique C.,*  
28 *David G., Patryce G., Melanie S., Omar Y.,* and other Medi-Cal beneficiaries, for payment of

1 a health care benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a  
2 felony.

3  
4 **COUNT 20**

5 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

6 On or about and between, September 9, 2002, and June 30, 2003, in the County of  
7 Stanislaus, State of California, and elsewhere, defendant, **(D16) Benham ROSTAMI**,  
8 committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and  
9 aid, abet, solicit, and conspire with others known and unknown, and did knowingly make and  
10 cause to be made false and fraudulent claims on behalf of *Jose B., Kari C., Enrique G., Chan*  
11 *T., Torri W.*, and other Medi-Cal beneficiaries, for payment of a health care benefit under the  
12 Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

13  
14 **COUNT 21**

15 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

16 On or about and between, April 6, 2002, and July 25, 2002, in the County of Stanislaus,  
17 State of California, and elsewhere, defendant, **(D17) Williams Defreitas SARAIVA**, committed  
18 the crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet,  
19 solicit, and conspire with others known and unknown, and did knowingly make and cause to be  
20 made false and fraudulent claims on behalf of *Da Marcus B., Tammy E., Shauna L., Maria*  
21 *M., Juana P., Vannalee T.*, and other Medi-Cal beneficiaries, for payment of a health care  
22 benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

23  
24 **COUNT 22**

25 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

26 On or about and between, October 28, 2003, and May 9, 2003, in the County of  
27 Stanislaus, State of California, and elsewhere, defendant, **(D18) Seyed Mohammed**  
28 **TARIFARD**, committed the crime of **HEALTH BENEFITS FRAUD** in that said defendant did



1 commit and aid, abet, solicit, and conspire with others known and unknown, and did knowingly  
2 make and cause to be made false and fraudulent claims on behalf of *Sithy B., Kelsey D.,*  
3 *Prentiss H., Lane H., Alejandra L., Jessica M.,* and other Medi-Cal beneficiaries, for  
4 payment of a health care benefit under the Medi-Cal program, in violation of Penal Code  
5 §550(a)(6), a felony.

6  
7 **COUNT 23**

8 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

9 On or about and between, October 6, 2001, and February 8, 2002, in the County of  
10 Stanislaus, State of California, and elsewhere, defendant, **(D19) Tri Duy VU**, committed the  
11 crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit,  
12 and conspire with others known and unknown, and did knowingly make and cause to be made  
13 false and fraudulent claims on behalf of *Rene A., Andrea A., Jose B., Vanessa B., Jennifer*  
14 *E., Joshua J., Hozeta O., Nicole P., Nang T., Bridget W.,* and other Medi-Cal  
15 beneficiaries, for payment of a health care benefit under the Medi-Cal program, in violation of  
16 Penal Code §550(a)(6), a felony.

17  
18 **COUNT 24**

19 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

20 On or about and between, February 3, 2003, and October 17, 2003, in the County of  
21 Stanislaus, State of California, and elsewhere, defendant, **(D20) Shiyu WANG**, committed the  
22 crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit,  
23 and conspire with others known and unknown, and did knowingly make and cause to be made  
24 false and fraudulent claims on behalf of *Lina A., Teresa B., George D., Jose G., Linot Z.,*  
25 and other Medi-Cal beneficiaries, for payment of a health care benefit under the Medi-Cal  
26 program, in violation of Penal Code §550(a)(6), a felony.

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1 **COUNT25**

2 **(Medi-Cal Health Benefits Fraud, Pen. Code § 550(a)(6))**

3 On or about and between, April 21, 2003, and June 16, 2003, in the County of Stanislaus,  
4 State of California, and elsewhere, defendant, **(D21) Faruk Cenap YETEK**, committed the  
5 crime of **HEALTH BENEFITS FRAUD** in that said defendant did commit and aid, abet, solicit,  
6 and conspire with others known and unknown, and did knowingly make and cause to be made  
7 false and fraudulent claims on behalf of *Ameina A., Marcella C., Jose G., Sergio H., Estela*  
8 *M., Brandy V., Victor V.*, and other Medi-Cal beneficiaries, for payment of a health care  
9 benefit under the Medi-Cal program, in violation of Penal Code §550(a)(6), a felony.

10  
11 **COUNT 26**

12 **(Preparing a Writing in Support of Health Benefits Fraud, Pen. Code § 550(a)(5))**

13 On or about and between November 9, 1999, and December 31, 2003, in the County of  
14 Stanislaus, State of California, and elsewhere, in the furtherance of the conspiracy commenced in  
15 Stanislaus County, defendants,

16 **(D01) Kyon Maung TEO,**  
17 **(D02) Kin Thor PANG,**  
18 **(D03) Steve Sangmoon AHN,**  
19 **(D04) Hoon Young CHANG,**  
20 **(D05) Wen Hsiang CHOU,**  
21 **(D06) Anthony Halili GALVAN,**  
22 **(D07) Eduardo Sabater GERODIAS,**  
23 **(D08) Shahry Baradaran HASHEMI,**  
24 **(D09) Keith Yoshikazu KOMAKI,**  
25 **(D10) Ricky Hung-Tak LAM,**  
26 **(D11) Rahim MESBAH,**  
**(D12) Duc Sy NGUYEN,**  
**(D13) San Hyuk PARK,**  
**(D14) Luis Alexandrino PINTO,**  
**(D15) Rudolfo Poscablo RAVANERA,**  
**(D16) Benham ROSTAMI,**  
**(D17) Williams Defreitas SARAIVA,**  
**(D18) Seyed Mohammad TARIFARD,**  
**(D19) Tri Duy VU,**  
**(D20) Shiyu WANG,**  
**(D21) Faruk Cenap YETEK,**

27 committed the crime of **PREPARING A WRITING IN SUPPORT OF HEALTH**  
28 **BENEFITS FRAUD** in that said defendants did commit and aid, abet, solicit, and conspire with

one another and others known and unknown, and did knowingly prepare, make and subscribe a writing, to wit, documents relating to the medical records of Medi-Cal beneficiaries and private insurance patients, with the intent to present and use it, and allow it to be presented and used in support of a false and fraudulent claim for payment of a health care benefit, in violation of Penal Code §550(a)(5), 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 9, 11, and 13 through 25, that defendants,

(D01) Kyon Maung TEO,  
(D02) Kin Thor PANG,  
(D03) Steve Sangmoon AHN,  
(D04) Hoon Young CHANG,  
(D05) Wen Hsiang CHOU,  
(D07) Eduardo Sabater GERODIAS,  
(D09) Keith Yoshikazu KOMAKI,  
(D10) Ricky Hung-Tak LAM,  
(D11) Rahim MESBAH,  
(D12) Duc Sy NGUYEN,  
(D13) San Hyuk PARK,  
(D14) Luis Alexandrino PINTO,  
(D15) Rudolfo Poscablo RAVANERA,  
(D16) Benham ROSTAMI,  
(D17) Williams Defreitas SARAIVA,  
(D18) Seyed Mohammad TARIFARD,  
(D19) Tri Duy VU,  
(D20) Shiyu WANG,  
(D21) Faruk Cenap YETEK,

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).

1 **SPECIAL ALLEGATION**

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

3 It is further alleged that in the commission of the felonies charged in Counts 1 through 9,  
4 11, 13 through 15, and 17 through 24, that defendants,

5 (D01) Kyon Maung TEO,  
6 (D02) Kin Thor PANG,  
7 (D03) Steve Sangmoon AHN,  
8 (D04) Hoon Young CHANG,  
9 (D05) Wen Hsiang CHOU,  
10 (D07) Eduardo Sabater GERODIAS,  
11 (D09) Keith Yoshikazu KOMAKI,  
12 (D10) Ricky Hung-Tak LAM,  
13 (D11) Rahim MESBAH,  
14 (D13) San Hyuk PARK,  
15 (D14) Luis Alexandrino PINTO,  
16 (D15) Rudolfo Poscablo RAVANERA,  
17 (D16) Benham ROSTAMI,  
18 (D17) Williams Defreitas SARAIVA,  
19 (D18) Seyed Mohammad TARIFARD,  
20 (D19) Tri Duy VU,  
21 (D20) Shiyu WANG,

22 with the intent to cause so, took, damaged, and destroyed property of a value in excess of One  
23 Hundred Fifty Thousand Dollars (\$150,000), within the meaning of Penal Code §12022.6(a)(2).  
24

25 **SPECIAL ALLEGATION**

26 **LOSS OVER ONE MILLION DOLLARS: Penal Code §12022.6(a)(3)**

27 It is further alleged that in the commission of the felonies charged in Counts 1 through 8,  
28 and 15, that defendants,

29 (D01) Kyon Maung TEO,  
30 (D02) Kin Thor PANG,  
31 (D03) Steve Sangmoon AHN,  
32 (D04) Hoon Young CHANG,  
33 (D11) Rahim MESBAH,

34 with the intent to cause so, took, damaged, and destroyed property of a value in excess of One  
35 Million Dollars (\$1,000,000), within the meaning of Penal Code §12022.6(a)(3).  
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1 **SPECIAL ALLEGATION**

2 **LOSS OVER 2.5 MILLION DOLLARS: Penal Code §12022.6(a)(4)**

3 It is further alleged that in the commission of the felonies charged in Counts 1 through 4,  
4 that defendants, **(D01) Kyon Maung TEO**, and **(D02) Kin Thor PANG**, with the intent to cause  
5 so, took, damaged, and destroyed property of a value in excess of Two Million Five Hundred  
6 Thousand Dollars (\$2,500,000), within the meaning of Penal Code §12022.6(a)(4).

7  
8 **SPECIAL ALLEGATION**

9 **AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT**

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

11 It is further alleged that the offenses charged in Counts 1 through 9, 11, 13 through 15,  
12 and 17 through 24, committed by defendants,

13 **(D01) Kyon Maung TEO,**  
14 **(D02) Kin Thor PANG,**  
15 **(D03) Steve Sangmoon AHN,**  
16 **(D04) Hoon Young CHANG,**  
17 **(D05) Wen Hsiang CHOU,**  
18 **(D07) Eduardo Sabater GERODIAS,**  
19 **(D09) Keith Yoshikazu KOMAKI,**  
20 **(D10) Ricky Hung-Tak LAM,**  
21 **(D11) Rahim MESBAH,**  
**(D13) San Hyuk PARK,**  
**(D14) Luis Alexandrino PINTO,**  
**(D15) Rudolfo Poscablo RAVANERA,**  
**(D16) Benham ROSTAMI,**  
**(D17) Williams Defreitas SARAIVA,**  
**(D18) Seyed Mohammad TARIFARD,**  
**(D19) Tri Duy VU,**  
**(D20) Shiyu WANG,**

22 are related felonies, a material element of which is fraud, which involve a pattern of related  
23 felony conduct, and the pattern of related felony conduct involves the taking of more than One  
24 Hundred Thousand Dollars (\$100,000), within the meaning of Penal Code §186.11(a)(1).

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1 **SPECIAL ALLEGATION**

2 **AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT**

3 **LOSS OVER \$500,000: Penal Code §186.11(a)(2)**

4 It is further alleged that the offenses charged in Counts 1 through 8, 11, 15 and 20,  
5 committed by defendants,

6 (D01) Kyon Maung TEO,  
7 (D02) Kin Thor PANG,  
8 (D03) Steve Sangmoon AHN,  
9 (D04) Hoon Young CHANG,  
(D07) Eduardo Sabater GERODIAS,  
(D11) Rahim MESBAH,  
(D16) Benham ROSTAMI,

10 are related felonies, a material element of which is fraud, which involve a pattern of related  
11 felony conduct, and the pattern of related felony conduct involves the taking of more than Five  
12 Hundred Thousand Dollars (\$500,000), within the meaning of Penal Code §186.11(a)(2).

13 **SPECIAL ALLEGATION**

14 **PROBATION LIMITATION: Penal Code §1203.045**

15 It is further alleged that in the commission of the felonies charged in Counts 1 through 9,  
16 11, 13 through 15, and 17 through 24, that defendants,

17 (D01) Kyon Maung TEO,  
18 (D02) Kin Thor PANG,  
19 (D03) Steve Sangmoon AHN,  
20 (D04) Hoon Young CHANG,  
21 (D05) Wen Hsiang CHOU,  
22 (D07) Eduardo Sabater GERODIAS,  
23 (D09) Keith Yoshikazu KOMAKI,  
24 (D10) Ricky Hung-Tak LAM,  
25 (D11) Rahim MESBAH,  
(D13) San Hyuk PARK,  
(D14) Luis Alexandrino PINTO,  
(D15) Rudolfo Poscablo RAVANERA,  
(D16) Benham ROSTAMI,  
(D17) Williams Defreitas SARAIVA,  
(D18) Seyed Mohammad TARIFARD,  
(D19) Tri Duy VU,  
(D20) Shiyu WANG,

26 with the intent to do so, took a value in excess of One Hundred Thousand Dollars (\$100,000),  
27 within the meaning of the Penal Code §1203.045, thereby requiring the named defendants be  
28 denied probation.

1 **SPECIAL ALLEGATION**

2 **INTENTIONAL INFLICTION OF GREAT BODILY INJURY: Penal Code §12022.7**

3 It is further alleged that in the commission of the felonies charged in Counts 1 through 25,  
4 that defendants,

5 (D01) Kyon Maung TEO,  
6 (D03) Steve Sangmoon AHN,  
7 (D04) Hoon Young CHANG,  
8 (D05) Wen Hsiang CHOU,  
9 (D06) Anthony Halili GALVAN,  
10 (D07) Eduardo Sabater GERODIAS,  
11 (D08) Shahry Baradaran HASHEMI,  
12 (D09) Keith Yoshikazu KOMAKI,  
13 (D10) Ricky Hung-Tak LAM,  
14 (D11) Rahim MESBAH,  
15 (D12) Duc Sy NGUYEN,  
16 (D13) San Hyuk PARK,  
17 (D14) Luis Alexandrino PINTO,  
18 (D15) Rudolfo Poscablo RAVANERA,  
19 (D16) Benham ROSTAMI,  
20 (D17) Williams Defreitas SARAIVA,  
21 (D18) Seyed Mohammad TARIFARD,  
22 (D19) Tri Duy VU,  
23 (D20) Shiyu WANG,  
24 (D21) Faruk Cenap YETEK,

25 personally inflicted great bodily injury on one or more of the persons named in Counts 1  
26 through 25, and 27 through 42.

27 **COUNT 27**

28 **(Assault by Force Likely To Cause Great Bodily Injury, Pen. Code § 245(a)(1))**

On or about April 29, 2002, in the County of Stanislaus, State of California, defendant,  
(D01) Kyon Maung TEO, committed the crime of **ASSAULT BY MEANS OF FORCE  
LIKELY TO PRODUCE GREAT BODILY INJURY**, in that said defendant did willfully and  
unlawfully commit an assault upon *Marianne S.* by means of force likely to produce great bodily  
injury, in violation of Penal Code §245(a)(1), a felony.

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**COUNT 28**

**(Assault by Force Likely To Cause Great Bodily Injury, Pen. Code § 245(a)(1))**

On or about May 11, 2002, in the County of Stanislaus, State of California, defendant, **(D04) Hoon Young CHANG**, committed the crime of **ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY**, in that said defendant did willfully and unlawfully commit an assault upon *Ameina A.* by means of force likely to produce great bodily injury, in violation of Penal Code §245(a)(1), a felony.

**COUNT 29**

**(Assault by Force Likely To Cause Great Bodily Injury, Pen. Code § 245(a)(1))**

On or about October 31, 2001, in the County of Stanislaus, State of California, defendant, **(D07) Eduardo Sabater GERODIAS**, committed the crime of **ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY**, in that said defendant did willfully and unlawfully commit an assault upon *Louie M.* by means of force likely to produce great bodily injury, in violation of Penal Code §245(a)(1), a felony.

**COUNT 30**

**(Assault by Force Likely To Cause Great Bodily Injury, Pen. Code § 245(a)(1))**

On or about December 19, 2002, in the County of Stanislaus, State of California, defendant, **(D09) Keith Yoshikazu KOMAKI**, committed the crime of **ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY**, in that said defendant did willfully and unlawfully commit an assault upon *Brandice J.* by means of force likely to produce great bodily injury, in violation of Penal Code §245(a)(1), a felony.

**COUNT 31**

**(Assault by Force Likely To Cause Great Bodily Injury, Pen. Code § 245(a)(1))**

On or about December 13, 2001, and in the furtherance of the conspiracy commenced in the County of Stanislaus, State of California, defendant, **(D11) Rahim MESBAH**, committed the



1 crime of **ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY**  
2 **INJURY**, in that said defendant did willfully and unlawfully commit an assault upon *Alice M.* by  
3 means of force likely to produce great bodily injury, in violation of Penal Code §245(a)(1), a  
4 felony.

5  
6 **COUNT 32**

7 **(Assault by Force Likely To Cause Great Bodily Injury, Pen. Code § 245(a)(1))**

8 On or about December 6, 2001, in the County of Stanislaus, State of California,  
9 defendant, **(D15) Rudolfo Poscablo RAVANERA**, committed the crime of **ASSAULT BY**  
10 **MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY**, in that said  
11 defendant did willfully and unlawfully commit an assault upon *Melanie S.* by means of force  
12 likely to produce great bodily injury, in violation of Penal Code §245(a)(1), a felony.

13  
14 **COUNT 33**

15 **(Assault by Force Likely To Cause Great Bodily Injury, Pen. Code § 245(a)(1))**

16 On or about November 14, 2001, in the County of Stanislaus, State of California,  
17 defendant, **(D19) Tri Duy VU**, committed the crime of **ASSAULT BY MEANS OF FORCE**  
18 **LIKELY TO PRODUCE GREAT BODILY INJURY**, in that said defendant did willfully and  
19 unlawfully commit an assault upon *Jose B.* by means of force likely to produce great bodily  
20 injury, in violation of Penal Code §245(a)(1), a felony.

21  
22 **COUNT 34**

23 **(Child Abuse, Pen. Code § 273a(a))**

24 On or about October 4, 2002, in the County of Stanislaus, State of California, defendant,  
25 **(D03) Steve Sangmoon AHN**, committed the crime of **CHILD ABUSE**, in that said defendant  
26 did willfully and unlawfully, under circumstances likely to produce great bodily harm and death,  
27 injure, cause, and permit a child, *Nicole B.*, to suffer and to be inflicted with unjustifiable  
28 physical pain and mental suffering, and, having the care and custody of said child, injure, cause,

1 and permit the person and health of said child to be injured and did willfully cause and permit  
2 said child to be placed in such situation that his/her person and health was endangered, in  
3 violation of Penal Code §273a(a), a felony.

4  
5 **COUNT 35**

6 **(Child Abuse, Pen. Code § 273a(a))**

7 On or about June 2, 2003, in the County of Stanislaus, State of California, defendant,  
8 **(D16) Benham ROSTAMI**, committed the crime of **CHILD ABUSE**, in that said defendant did  
9 willfully and unlawfully, under circumstances likely to produce great bodily harm and death,  
10 injure, cause, and permit a child, *Kari C.*, and *Enrique G.*, to suffer and to be inflicted with  
11 unjustifiable physical pain and mental suffering, and, having the care and custody of said child,  
12 injure, cause, and permit the person and health of said child to be injured and did willfully cause  
13 and permit said child to be placed in such situation that his/her person and health was  
14 endangered, in violation of Penal Code §273a(a), a felony.

15  
16 **COUNT 36**

17 **(Child Abuse, Pen. Code § 273a(a))**

18 On or about and between September 30, 2002, and October 7, 2002, in the County of  
19 Stanislaus, State of California, defendants, **(D03) Steve Sangmoon AHN**, and **(D11) Rahim**  
20 **MESBAH**, committed the crime of **CHILD ABUSE**, in that said defendants did willfully and  
21 unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and  
22 permit a child, *Wendy S.*, to suffer and to be inflicted with unjustifiable physical pain and mental  
23 suffering, and, having the care and custody of said child, injure, cause, and permit the person and  
24 health of said child to be injured and did willfully cause and permit said child to be placed in  
25 such situation that his/her person and health was endangered, in violation of Penal Code  
26 §273a(a), a felony.

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**COUNT 37**

**(Child Abuse, Pen. Code § 273a(a))**

On or about and between September 22, 2001, and October 6, 2001, in the County of Stanislaus, State of California, defendants, **(D05) Wen Hsiang CHOU**, committed the crime of **CHILD ABUSE**, in that said defendants did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, *James G.*, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was endangered, in violation of Penal Code §273a(a), a felony.

**COUNT 38**

**(Child Abuse, Pen. Code § 273a(a))**

On or about and between July 5, 2002, and September 4, 2002, in the County of Stanislaus, State of California, defendants, **(D01) Kyon Maung TEO**, and **(D17) Williams Defreitas SARAIVA**, committed the crime of **CHILD ABUSE**, in that said defendants did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, *Vannalee T.*, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was endangered, in violation of Penal Code §273a(a), a felony.

**COUNT 39**

**(Child Abuse, Pen. Code § 273a(a))**

On or about and between May 9, 2002, and December 12, 2002, in the furtherance of the conspiracy commenced in the County of Stanislaus, State of California, defendant, **(D17) Williams Defreitas SARAIVA**, committed the crime of **CHILD ABUSE**, in that said

1 defendants did willfully and unlawfully, under circumstances likely to produce great bodily harm  
2 and death, injure, cause, and permit a child, *Da Marcus B.*, to suffer and to be inflicted with  
3 unjustifiable physical pain and mental suffering, and, having the care and custody of said child,  
4 injure, cause, and permit the person and health of said child to be injured and did willfully cause  
5 and permit said child to be placed in such situation that his/her person and health was  
6 endangered, in violation of Penal Code §273a(a), a felony.

7 **COUNT 40**

8 **(Child Abuse, Pen. Code § 273a(a))**

9 On or about and between November 28, 2001, and January 14, 2002, and in the  
10 furtherance of the conspiracy commenced in the County of Stanislaus, State of California,  
11 defendants, **(D12) Duc Sy NGUYEN**, and **(D19) Tri Duy VU**, committed the crime of **CHILD**  
12 **ABUSE**, in that said defendants did willfully and unlawfully, under circumstances likely to  
13 produce great bodily harm and death, injure, cause, and permit a child, *Torrie W.*, to suffer and to  
14 be inflicted with unjustifiable physical pain and mental suffering, and, having the care and  
15 custody of said child, injure, cause, and permit the person and health of said child to be injured  
16 and did willfully cause and permit said child to be placed in such situation that his/her person and  
17 health was endangered, in violation of Penal Code §273a(a), a felony.

18  
19 **COUNT 41**

20 **(Elder Abuse, Pen. Code § 368(b))**

21 On or about June 7, 2001, in the County of Stanislaus, State of California, defendant,  
22 **(D10) Ricky Hung-Tak LAM**, committed the crime of **ELDER ABUSE**, in that said defendant  
23 did knowingly and willfully cause and permit the victim, *Sunder S.*, an elder and dependent adult,  
24 to suffer, and inflicted thereon, unjustifiable physical pain and mental suffering and, having the  
25 care and custody of said victim, willfully caused and permitted him to be placed in a situation in  
26 which his health was endangered, in violation of Penal Code §368(b)(1), a felony.

27 It is further alleged, pursuant to section 368(b)(2)(B), that said victim, age 88 years,  
28 suffered great bodily injury.

1 **COUNT 42**

2 **(Elder Abuse, Pen. Code § 368(b))**

3 On or about, and between January 30, 2001, and February 8, 2001, in the County of  
4 Stanislaus, State of California, defendant, **(D13) Sang Hyuk PARK**, committed the crime of  
5 **ELDER ABUSE**, in that said defendant did knowingly and willfully cause and permit the  
6 victim, *Leonardo G.*, an elder and dependent adult, to suffer, and inflicted thereon, unjustifiable  
7 physical pain and mental suffering and, having the care and custody of said victim, willfully  
8 caused and permitted him to be placed in a situation in which his health was endangered, in  
9 violation of Penal Code §368(b)(1), a felony.

10 It is further alleged, pursuant to section 368(b)(2)(A), that said victim, age 69 years,  
11 suffered great bodily injury.

12  
13 **COUNT 43**

14 **(Worker's Compensation Premium Fraud, Ins. Code § 11760(a))**

15 On or about and between January 1, 2000, and October 27, 2000, in the County of  
16 Stanislaus, State of California, defendants, **(D01) Kyon Maung TEO**, and **(D02) Kin Thor**  
17 **PANG**, committed the crime of **WORKERS' COMPENSATION PREMIUM FRAUD** in that  
18 said defendants did knowingly make and cause to be made a false and fraudulent statement,  
19 orally and in writing, of a fact material to the determination of the premium, rate, and cost of a  
20 policy of workers' compensation insurance, for the purpose of reducing the premium, rate and  
21 cost of insurance, in violation of Insurance Code section 11760(a), a felony.

22  
23 **COUNT 44**

24 **(Worker's Compensation Premium Fraud, Ins. Code § 11760(a))**

25 On or about and between October 27, 2000, and April 23, 2003, in the County of  
26 Stanislaus, State of California, defendants, **(D01) Kyon Maung TEO**, and **(D02) Kin Thor**  
27 **PANG**, committed the crime of **WORKERS' COMPENSATION PREMIUM FRAUD** in that  
28 said defendants did knowingly make and cause to be made a false and fraudulent statement,

1 orally and in writing, of a fact material to the determination of the premium, rate, and cost of a  
2 policy of workers' compensation insurance, for the purpose of reducing the premium, rate and  
3 cost of insurance, in violation of Insurance Code section 11760(a), a felony.

4  
5 **REQUEST FOR ARREST WARRANT**

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

9  
10 **DECLARATION**

11 I declare under penalty of perjury under the laws of the State of California that the  
12 foregoing is true and correct. Signed at Modesto, California this \_\_\_\_ day of September, 2004.

13  
14 \_\_\_\_\_  
15 JEFF WALL  
16 Special Agent  
17 Bureau of Medi-Cal Fraud & Elder Abuse  
18 California Department of Justice  
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22 **REQUEST FOR DISCOVERY**

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

## HOLDING ORDER

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

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

### Defendant (D01) Kyon Maung Teo

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	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	
4	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
	<u>Special Allegation Re Counts 1-4</u>		
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen Code § 12022.6(a)(3) - Taking > \$1 Million		+3 Year
	Pen.Code § 12022.6(a)(4) - Taking > \$2.5 Million		+4 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 186.11(a)(2) - Loss > \$500,000		2-3-5
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
27	Penal Code, §245(a)(1) Assault w/Force Likely to Produce GBI	2-3-4	
38	Penal Code, §273a(a) - Child Abuse	2-4-6	
43	Ins. Code, §11760(a) - WComp Premium Fraud	2-3-4	
44	Ins. Code, §11760(a) - WComp Premium Fraud	2-3-4	

**Defendant (D02) Kin Thor Pang**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	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	
4	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-4</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen Code § 12022.6(a)(3) - Taking > \$1 Million		+3 Year
	Pen.Code § 12022.6(a)(4) - Taking > \$2.5 Million		+4 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 186.11(a)(2) - Loss > \$500,000		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
43	Ins. Code, §11760(a) - WComp Premium Fraud	2-3-4	
44	Ins. Code, §11760(a) - WComp Premium Fraud	2-3-4	
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**Defendant (D03) Steve Sangmoon Ahn**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
5	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
6	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 5-6</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen Code § 12022.6(a)(3) - Taking > \$1 Million		+3 Year
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 186.11(a)(2) - Loss > \$500,000		2-3-5
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
34	Penal Code, §273a(a) - Child Abuse	2-4-6	
36	Penal Code, §273a(a) - Child Abuse	2-4-6	
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**Defendant (D04) Hoon Young Chang**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
7	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
8	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 7-8</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen Code § 12022.6(a)(3) - Taking > \$1 Million		+3 Year
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 186.11(a)(2) - Loss > \$500,000		2-3-5
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
28	Penal Code, §245(a)(1) Assault w/Force Likely to Produce GBI	2-3-4	
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**Defendant (D05) Wen Hsiang Chou**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
9	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<b><u>Special Allegation Re Counts 1-2 &amp; 9</u></b>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
37	Penal Code, §273a(a) - Child Abuse	2-4-6	
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**Defendant (D07) Eduardo Sabater Gerodias**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
11	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
	<u>Special Allegation Re Counts 1-2 &amp; 11</u>		
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 186.11(a)(2) - Loss > \$500,000		2-3-5
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
29	Penal Code, §245(a)(1) Assault w/Force Likely to Produce GBI	2-3-4	
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**Felony Complaint - People v. Kyon Maung Teo, DDS, et al.**

**Defendant (D09) Keith Yoshikazu Komaki**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
13	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 13</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
30	Penal Code, §245(a)(1) Assault w/Force Likely to Produce GBI	2-3-4	
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**Defendant (D10) Ricky Hung-Tak Lam**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
14	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 14</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
41	Penal Code, §368(b) - Elder Abuse + GBI Allegation §368(b)(2)(B)	2-3-4	+5
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**Defendant (D11) Rahim Mesbah**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
15	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<b><u>Special Allegation Re Counts 1-2 &amp; 15</u></b>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen Code § 12022.6(a)(3) - Taking > \$1 Million		+3 Year
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 186.11(a)(2) - Loss > \$500,000		2-3-5
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
31	Penal Code, §245(a)(1) Assault w/Force Likely to Produce GBI	2-3-4	
36	Penal Code, §273a(a) - Child Abuse	2-4-6	
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**Defendant (D12) Duc Sy Nguyen**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
16	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
	<u>Special Allegation Re Counts 1-2 &amp; 16</u>		
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
40	Penal Code, §273a(a) - Child Abuse	2-4-6	
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**Defendant (D13) Sang Hyuk Park**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
17	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 17</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
42	Penal Code, §368(b) - Elder Abuse + GBI Allegation §368(b)(2)(A)	2-3-4	+3
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**Defendant (D14) Luis Alexandrino Pinto**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
18	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 18</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
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**Defendant (D15) Rudolfo Poscablo Ravanera**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
19	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 19</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
32	Penal Code, §245(a)(1) Assault w/Force Likely to Produce GBI	2-3-4	
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**Defendant (D16) Benham Rostami**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
20	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 20</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 186.11(a)(2) - Loss > \$500,000		2-3-5
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
35	Penal Code, §273a(a) - Child Abuse	2-4-6	
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**Defendant (D17) Williams Defreitas Saraiva**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
21	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 21</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
38	Penal Code, §273a(a) - Child Abuse	2-4-6	
39	Penal Code, §273a(a) - Child Abuse	2-4-6	
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**Defendant (D18) Seyed Mohammad Tarifard**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
22	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
	<u>Special Allegation Re Counts 1-2 &amp; 21</u>		
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
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**Defendant (D19) Tri Duy Vu**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107. Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
23	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
<u>Special Allegation Re Counts 1-2 &amp; 23</u>			
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
33	Penal Code, §245(a)(1) Assault w/Force Likely to Produce GBI	2-3-4	
40	Penal Code, §273a(a) - Child Abuse	2-4-6	
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**Defendant (D20) Shiyu Wang**

<u>Count</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>
1	Pen.Code, §§182(a)(1), 182(a)(4), 182(a)(5), 487, 550(a)(5), 550(a)(6), and Welf.&Inst. Code §§14107.Conspiracy to Commit Grand Theft, to Cheat And Defraud The Medi-cal Dental Program, to Commit Health Benefits Fraud, to Commit Medi-cal Fraud, and to Commit an Act Injurious to Public Health and Morals and the Due Administration of Laws	2-3-5	
2	Penal Code, §487(a) - Grand Theft	16-2-3	
24	Penal Code, §550(a)(6) - Health Benefits Fraud	2-3-5	
	<u>Special Allegation Re Counts 1-2 &amp; 24</u>		
	Pen Code § 12022.6(a)(1) - Taking > \$ 50,000		+1 Year
	Pen.Code § 12022.6(a)(2) - Taking > \$150,000		+2 Years
	Pen.Code § 186.11(a)(1) - Loss > \$100,000		+1 Yr
	Pen.Code § 12022.7 - Personal Infliction of GBI		2-3-5
	Pen.Code § 1203.045 - Loss > \$100,000		No Probation
26	Penal Code, §550(a)(5) Writing in Support of Health Benefits Fraud	2-3-5	
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1 [IT IS FURTHER ORDERED that defendant **(D01) Kyon Maung TEO** is committed to  
the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
2 \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D01) Kyon Maung TEO**  
shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until  
3 bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant  
4 **(D01) Kyon Maung TEO** shall remain discharged from custody upon bail in the sum of  
\$ \_\_\_\_\_.]

5  
6 [IT IS FURTHER ORDERED that defendant **(D02) Kin Thor PANG** 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 **(D02) Kin Thor PANG** shall  
7 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 **(D02) Kin**  
8 **Thor PANG** shall remain discharged from custody upon bail in the sum of \$ \_\_\_\_\_.]

9  
10 [IT IS FURTHER ORDERED that defendant **(D03) Steve Sangmoon AHN** 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 **(D03) Steve Sangmoon AHN**  
11 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  
12 **(D03) Steve Sangmoon AHN** shall remain discharged from custody upon bail in the sum of  
\$ \_\_\_\_\_.]

13  
14 [IT IS FURTHER ORDERED that defendant **(D04) Hoon Young CHANG** is committed  
to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
15 \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D04) Hoon Young CHANG**  
shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until  
16 bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant  
**(D04) Hoon Young CHANG** shall remain discharged from custody upon bail in the sum of  
17 \$ \_\_\_\_\_.]

18  
19 [IT IS FURTHER ORDERED that defendant **(D05) Wen Hsiang CHOU** is committed to  
the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
20 \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D05) Wen Hsiang CHOU**  
shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until  
21 bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant  
**(D05) Wen Hsiang CHOU** shall remain discharged from custody upon bail in the sum of  
22 \$ \_\_\_\_\_.]

23  
24 [IT IS FURTHER ORDERED that defendant **(D06) Anthony Halili GALVAN** is  
committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the  
25 sum of \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D06) Anthony Halili**  
**GALVAN** shall continue to be committed to the custody of the Sheriff of the County of Los  
26 Angeles, until bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER ORDERED that  
defendant **(D06) Anthony Halili GALVAN** shall remain discharged from custody upon bail in  
27 the sum of \$ \_\_\_\_\_.]

1 [IT IS FURTHER ORDERED that defendant **(D07) Eduardo Sabater GERODIAS** is  
2 committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the  
3 sum of \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D07) Eduardo**  
4 **Sabater GERODIAS** shall continue to be committed to the custody of the Sheriff of the County  
5 of Los Angeles, until bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER  
6 ORDERED that defendant **(D07) Eduardo Sabater GERODIAS** shall remain discharged from  
7 custody upon bail in the sum of \$ \_\_\_\_\_.]

8 [IT IS FURTHER ORDERED that defendant **(D08) Shahry Baradaran HASHEMI** is  
9 committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the  
10 sum of \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D08) Shahry**  
11 **Baradaran HASHEMI** shall continue to be committed to the custody of the Sheriff of the  
12 County of Los Angeles, until bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER  
13 ORDERED that defendant **(D08) Shahry Baradaran HASHEMI** shall remain discharged from  
14 custody upon bail in the sum of \$ \_\_\_\_\_.]

15 [IT IS FURTHER ORDERED that defendant **(D09) Keith Yoshikazu KOMAKI** is  
16 committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the  
17 sum of \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D09) Keith**  
18 **Yoshikazu KOMAKI** shall continue to be committed to the custody of the Sheriff of the  
19 County of Los Angeles, until bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER  
20 ORDERED that defendant **(D09) Keith Yoshikazu KOMAKI** shall remain discharged from  
21 custody upon bail in the sum of \$ \_\_\_\_\_.]

22 [IT IS FURTHER ORDERED that defendant **(D10) Ricky Hung-Tak LAM** is  
23 committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the  
24 sum of \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D10) Ricky Hung-**  
25 **Tak LAM** shall continue to be committed to the custody of the Sheriff of the County of Los  
26 Angeles, until bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER ORDERED that  
27 defendant **(D10) Ricky Hung-Tak LAM** shall remain discharged from custody upon bail in the  
28 sum of \$ \_\_\_\_\_.]

[IT IS FURTHER ORDERED that defendant **(D11) Rahim MESBAH** 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 **(D11) Rahim MESBAH** 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 **(D11)**  
**Rahim MESBAH** shall remain discharged from custody upon bail in the sum of  
\$ \_\_\_\_\_.]

[IT IS FURTHER ORDERED that defendant **(D12) Duc Sy NGUYEN** 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 **(D12) Duc Sy NGUYEN** 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 **(D12) Duc**  
**Sy NGUYEN** shall remain discharged from custody upon bail in the sum of \$ \_\_\_\_\_.]

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1 [IT IS FURTHER ORDERED that defendant **(D13) San Hyuk PARK** is committed to  
the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
2 \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D13) San Hyuk PARK** shall  
continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is  
3 posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant **(D13) San  
Hyuk PARK** shall remain discharged from custody upon bail in the sum of \$ \_\_\_\_\_.]  
4

5 [IT IS FURTHER ORDERED that defendant **(D14) Luis Alexandrino PINTO** is  
committed to the custody of the Sheriff of the County of Los Angeles until bail is posted in the  
6 sum of \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D14) Luis  
Alexandrino PINTO** shall continue to be committed to the custody of the Sheriff of the County  
7 of Los Angeles, until bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER  
ORDERED that defendant **(D14) Luis Alexandrino PINTO** shall remain discharged from  
8 custody upon bail in the sum of \$ \_\_\_\_\_.]  
9

10 [IT IS FURTHER ORDERED that defendant **(D15) Rudolfo Poscablo RAVANERA** 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 **(D15) Rudolfo  
11 Poscablo RAVANERA** 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  
12 ORDERED that defendant **(D15) Rudolfo Poscablo RAVANERA** shall remain discharged from  
custody upon bail in the sum of \$ \_\_\_\_\_.]  
13

14 [IT IS FURTHER ORDERED that defendant **(D16) Benham ROSTAMI** is committed  
to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
15 \$ \_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D16) Benham ROSTAMI**  
shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until  
16 bail is posted in the sum of \$ \_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant  
**(D16) Benham ROSTAMI** shall remain discharged from custody upon bail in the sum of  
17 \$ \_\_\_\_\_.]  
18

19 [IT IS FURTHER ORDERED that defendant **(D17) Williams Defreitas SARAIVA** 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 **(D17) Williams  
20 Defreitas SARAIVA** 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  
21 ORDERED that defendant **(D17) Williams Defreitas SARAIVA** shall remain discharged from  
custody upon bail in the sum of \$ \_\_\_\_\_.]  
22

23 [IT IS FURTHER ORDERED that defendant **(D18) Seyed Mohammad TARIFARD** 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 **(D18) Seyed  
24 Mohammad TARIFARD** 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  
25 ORDERED that defendant **(D18) Seyed Mohammad TARIFARD** shall remain discharged from  
custody upon bail in the sum of \$ \_\_\_\_\_.]  
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1 [IT IS FURTHER ORDERED that defendant **(D19) Tri Duy VU** is committed to the  
2 custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
3 \$\_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D19) Tri Duy VU** shall  
4 continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is  
5 posted in the sum of \$\_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant **(D19) Tri  
6 Duy VU** shall remain discharged from custody upon bail in the sum of \$\_\_\_\_\_.]

7 [IT IS FURTHER ORDERED that defendant **(D20) Shiyu WANG** is committed to the  
8 custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
9 \$\_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D20) Shiyu WANG** shall  
10 continue to be committed to the custody of the Sheriff of the County of Los Angeles, until bail is  
11 posted in the sum of \$\_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant **(D20)  
12 Shiyu WANG** shall remain discharged from custody upon bail in the sum of \$\_\_\_\_\_.]

13 [IT IS FURTHER ORDERED that defendant **(D21) Faruk Cenap YETEK** is committed  
14 to the custody of the Sheriff of the County of Los Angeles until bail is posted in the sum of  
15 \$\_\_\_\_\_.] or [IT IS FURTHER ORDERED that defendant **(D21) Faruk Cenap YETEK**  
16 shall continue to be committed to the custody of the Sheriff of the County of Los Angeles, until  
17 bail is posted in the sum of \$\_\_\_\_\_.] or IT IS FURTHER ORDERED that defendant  
18 **(D21) Faruk Cenap YETEK** shall remain discharged from custody upon bail in the sum of  
19 \$\_\_\_\_\_.]

20 Arraignment in Superior Court will be in Department \_\_\_\_, on  
21 \_\_\_\_\_, 2004, at \_\_\_\_\_ a.m./p.m.

22 Dated: \_\_\_\_\_

23 \_\_\_\_\_  
24 MAGISTRATE

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26  
27 BMFEA Docket No. SA2002MC5588  
28