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**No Fee Pursuant to Government
Code section 6103**

6 Attorneys for Plaintiff

7
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

10 THE PEOPLE OF THE STATE OF CALIFORNIA,
11
12 Plaintiff,

13 v.

14 SUN HEALTHCARE GROUP, INC.; CARE
ENTERPRISES, INC.; SUNBRIDGE HEALTHCARE
15 CORPORATION; CARE ENTERPRISES WEST, INC.;
REGENCY HEALTH SERVICES, INC.; SUNBRIDGE
16 STOCKTON REHABILITATION CENTER, INC.;
SUNBRIDGE CARE ENTERPRISES WEST, INC.;
17 SUNBRIDGE HARBOR VIEW REHABILITATION,
INC.; SUNBRIDGE MEADOWBROOK
18 REHABILITATION, INC.; SUNBRIDGE SHANDIN
HILLS REHABILITATION, INC.; SUNBRIDGE
19 HALLMARK HEALTH SERVICES, INC.; SUNBRIDGE
PARADISE REHABILITATION CENTER, INC.;
20 SUNBRIDGE BRITTANY REHABILITATION
CENTER, INC.; SUNBRIDGE CARMICHAEL
21 REHABILITATION CENTER, INC.; and SUNBRIDGE
BRASWELL ENTERPRISES, INC.,

22 Defendants.
23

Case No.:

**COMPLAINT FOR
VIOLATIONS OF
INJUNCTION ENTERED
PURSUANT TO BUSINESS
AND PROFESSIONS CODE
SECTION 17200 *et seq.***

24 The PEOPLE OF THE STATE OF CALIFORNIA, by and through BILL LOCKYER,
25 Attorney General of the State of California, are informed and believe and, based upon such
26 information and belief, allege as follows:
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1 **PARTIES AND VENUE**

2 1. This action is being brought pursuant to the authority under Business and Professions
3 Code section 17200 *et seq.*

4 2. This Court is the proper venue for this action because at least some of the acts and/or
5 omissions by defendants, and each of them, which are complained of herein, occurred within the
6 County of San Diego, Central District, State of California.

7 3. Plaintiff is informed and believes, and thereon alleges, that at all relevant times herein
8 mentioned defendants, and each of them, are and were doing business in the State of California,
9 and that at all relevant times herein mentioned said defendants operated offices and were
10 engaged in business within the County of San Diego, State of California.

11 4. Plaintiff is informed and believes, and thereon alleges, that at all relevant times herein
12 mentioned, the defendants, and each of them, owned, licensed, operated, administered, managed,
13 directed, and/or controlled skilled nursing facilities located within the State of California. Each
14 such skilled nursing facility was licensed and operating as a skilled nursing facility under the
15 laws of the State of California, and care for at least some residents of each such skilled nursing
16 facility was funded in part by Medi-Cal.

17 5. Plaintiff is informed and believes, and thereon alleges, that the defendants, and each of
18 them, were the agents, servants, associates, and/or employees of, and/or were partners and/or
19 joint venturers with, their co-defendants, and each of them, and in doing the things herein
20 alleged, were acting within the course and scope of their authority as such agents, servants,
21 associates, and/or employees of, and/or as such joint venturers and/or partners with, their co-
22 defendants, and each of them.

23 6. Whenever in this Complaint reference is made to any act of any individual defendant,
24 such allegation shall be deemed to mean that said defendant is and was acting: (a) as a principal,
25 (b) under express or implied agency, and/or (c) with actual or ostensible authority to perform the
26 acts so alleged.

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1 3. Pursuant to Business and Professions Code section 17206, civil penalties, according to
2 proof;

3 4. Pursuant to Business and Professions Code section 17206.1, civil penalties, according
4 to proof;

5 5. Costs of suit incurred herein; and

6 6. Such other and further relief as the Court may deem proper.

7 Dated: _____

Respectfully submitted,

BILL LOCKYER, Attorney General
of the State of California

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10
11 By: _____

CLAUDE W. VANDERWOLD
Deputy Attorney General
Elder Abuse Prosecution Unit
Bureau of Medi-Cal Fraud and Elder Abuse
Office of the Attorney General
California Department of Justice

Attorney for Plaintiff

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