

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

04/03/2017
09:20 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF0802

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 TANYA MORELAND KING 10/04/79) OCDA WC16070011
D7015982) OCDA WC15040015
12) OCDA HF12110001
13)
Defendant(s))

14 The Orange County District Attorney charges that in Orange
15 County, California, the law was violated as follows:

16 COUNT 1: On or about and between February 11, 2011 and
17 September 01, 2015, in violation of Section 550(a)(6) of the
18 Penal Code (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a
19 FELONY, TANYA MORELAND KING did unlawfully conspire with TANYA
20 MORELAND KING AND CHRISTOPHER KING AND OTHER UNKNOWN
21 INDIVIDUALS, with the intent to defraud, to make a false and
22 fraudulent claim to WORKERS' COMPENSATION INSURANCE CARRIERS IN
23 CALIFORNIA for payment of a health care benefit in an amount
exceeding nine hundred fifty dollars (\$950). It is further
alleged that pursuant to and for the purpose of carrying out the
objects and purposes of the conspiracy, one and more of the
conspirators committed the following overt acts:

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25 OVERT ACT 1

26 In 2011, Defendant Christopher King formed a business
27 partnership with his wife, Tanya Moreland King.

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OVERT ACT 2

Tanya Moreland King recruited physicians who treated workers compensation patients and gave them a financial incentive to prescribe compound transdermal creams, oral medications and Urine toxicology tests to their patients.

OVERT ACT 3

Between October 1, 2011 and January 15, 2015, Defendant Christopher King and Tanya Moreland King, used Steven's Pharmacy in Costa Mesa, to manufacture the compound transdermal creams for distribution to workers compensation patients.

OVERT ACT 4

Steven's Pharmacy was paid \$16 for every 30 gram (72 hour supply) and \$40 for every 120g tube it manufactured and in return permitted Defendant Christopher King and Tanya Moreland King to submit healthcare claims on Steven's Pharmacy's behalf to workers compensation insurance carriers at highly inflated prices.

OVERT ACT 5

Steven's Pharmacy mass manufactured transdermal compound creams using formulas that were profitable under the fee schedule at Tanya Moreland King and Defendant Christopher King's direction.

OVERT ACT 6

On April 26, 2011, Defendant Christopher King, filed documents with the Secretary of State to incorporate a company named Monarch Medical Group Inc., in California and named himself as the CEO, Secretary and CFO of the company.

OVERT ACT 7

Between, October 10, 2011 and January 15, 2015, Monarch Medical Group Inc. submitted healthcare claims to workers compensation carriers for 120g compound transdermal creams manufactured by Steven's Pharmacy, in Costa Mesa.

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OVERT ACT 8

Monarch Medical Group Inc., paid Steven's Pharmacy a flat rate of \$40 for each 120 gram transdermal compound cream tube, and billed workers compensation carriers between \$700 to \$1000 for the same tubes.

OVERT ACT 9

Between October 10, 2011 and January 15, 2015, Monarch Medical Group paid Steven's Pharmacy in excess of \$1,200,000.00 (one million and two hundred thousand dollars).

OVERT ACT 10

On October 17, 2011, Defendant Christopher King filed documents to form a corporation named King Medical Management, Inc., in California and named himself the CEO and Tanya Moreland King as the CFO and Secretary of the corporation.

OVERT ACT 11

King Medical Management submitted healthcare claims on behalf of the physicians who distributed the 30g tubes manufactured by Steven's Pharmacy in their offices to workers compensation carriers, and gave the physicians between 70 to 90 percent of the net profits, as long as the physicians also prescribed the 120g tubes which would be sent to the patients directly by Steven's Pharmacy.

OVERT ACT 12

Between October 2011 and August 2015, King Medical Management received in excess of \$3.7 million dollars in payments from workers compensation carriers and paid over \$2.3 million dollars to physicians as kickbacks.

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OVERT ACT 13

On and between 8/9/12 and 2/26/15, Defendant Christopher King and Tanya Moreland King, purchased medications and Active specimen Collection kits, from NuCare Pharmaceuticals, in the City of Orange, County of Orange to be distributed by the physicians who were recruited to work with Monarch Medical Group and King Medical Management.

OVERT ACT 14

Defendant Christopher King and Tanya Moreland King, billed workers compensation carriers through their company Monarch Medical Group for the medications and Active kits purchased from NuCare Pharmaceuticals, located in the City of Orange, County of Orange, and shared the net profits from the amounts collected with the physicians who prescribed these items to their workers compensation carriers.

OVERT ACT 15

On or between 2/15/15 and 11/11/16, Defendant Christopher King and Tanya Moreland King, through their company Monarch Medical Group, billed workers compensation carriers for the medications purchased from A S Medication Solutions, located in County of Orange, and shared the net profits from the amounts collected with the physicians who prescribed these items to their workers compensation carriers.

OVERT ACT 16

Defendant Tanya King made \$20,000 payments to Ismael Silva M.D. through her companies First Meditech, Preferred Medical and One Source Labs between October 20, 2011 and November 3, 2014.

OVERT ACT 17

In consideration for \$20,000 a month in payments, Ismael Silva Jr., M.D., permitted Defendant Tanya King's employees to come to his (8) eight clinics, named Healthpointe, including the ones located in the City of Garden Grove and the City of Anaheim, in the County of Orange, to collect Urine samples from workers compensation patients.

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OVERT ACT 18

On 12/26/14, Ismael Geli Silva wrote an email to Christopher King confirming their agreement for payments of \$20,000 and requested payment of the outstanding balance of \$200,000 for 2013 and \$140,000 for 2014.

OVERT ACT 19

Between 10/20/11 and 12/26/14, Tanya Moreland King and Christopher King agreed to and in fact paid Defendants Ismael Geli Silva and Ismael Silva Jr. M.D. in excess of \$685,000.

OVERT ACT 20

Between August 2011 and August of 2015, Monarch received in excess of \$13 million dollars in payments from workers compensation carriers and paid over \$1.9 million dollars of that revenue to the physicians as a kickback.

OVERT ACT 21

On February 17, 2012, Christopher King and Tanya King formed a corporation named One Source Laboratories, Inc., for the purpose of submitting claims, to workers compensation carriers involving Urine Toxicology Tests.

OVERT ACT 22

Between May 2012 and August 2015, One Source Labs Inc. and King Medical Management Inc. received in excess of \$6 million dollars in payments from Workers Compensation Carriers.

OVERT ACT 23

Between 8/12/12 and 1/15/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Christopher Chen MD in excess of \$289,000 in consideration for referring compound transdermal creams, oral medications, Sprix Nasal Spray, and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

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OVERT ACT 24

Between 7/8/13 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid the physicians at Central Desert Industrial Medical Group in excess of \$94,000 in consideration for referring compound transdermal creams, oral medications, Sprix Nasal Spray, and Urine Toxicology Tests to their company/ies, Monarch Medical Group, King Medical Management and One Source Labs Inc.

OVERT ACT 25

Between 8/8/13 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Duke Ahn, M.D. in excess of \$80,000 in consideration for referring compound transdermal creams, oral medications, Active Specimen Collection Kits, and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

OVERT ACT 26

Between 5/6/14 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Eduardo Lin, M.D. in excess of \$169,000 in consideration for referring compound transdermal creams, oral medications, Active specimen collection kits, and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

OVERT ACT 27

Between 9/12/12 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Eric Schmidt, M.D. in excess of \$308,000 in consideration for referring compound transdermal creams, oral medications, Sprix Nasal Spray, and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

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OVERT ACT 28

Between 11/12/14 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Jerome A Robson M.D. in excess of \$175,000 in consideration for referring compound transdermal creams, oral medications, Active specimen collection kits, and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

OVERT ACT 29

Between 12/14/12 and 6/11/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Mannie Joel M.D. in excess of \$26,000 in consideration for referring compound transdermal creams, and Sprix Nasal Spray, to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

OVERT ACT 30

Between 12/10/13 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Parvez Fatteh M.D. in excess of \$51,000 in consideration for referring compound transdermal creams, oral medications, Active specimen collection kits, Sprix Nasal Spray and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

OVERT ACT 31

Between, 6/12/12 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Jerome A Robson M.D. in excess of \$175,000 in consideration for referring compound transdermal creams, oral medications, Active specimen collection kits, and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

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OVERT ACT 32

Between 8/14/12 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Stanislaus Orthopedic Sports Medicine Clinic in excess of \$248,000 in consideration for referring compound transdermal creams, oral medications, Active specimen collection kits, and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

OVERT ACT 33

Between 3/17/11 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Kevin Shamlou M.D. in excess of \$38,000 in consideration for referring compound transdermal creams, oral medications, Active specimen collection kits, Sprix Nasal Spray, Patches and Urine Toxicology Tests to their companies, Monarch medical Group, King Medical Management and One Source Labs Inc.

COUNT 2: On or about and between April 12, 2013 and August 10, 2015, in violation of Section 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the intent to defraud, did unlawfully conceal and knowingly fail to disclose, and did knowingly assist with another person to conceal and fail to disclose the occurrence of an event and a fact that affected the initial and continued material right and entitlement of Accident Fund Group to an insurance benefit and payment, and to the amount of a benefit and payment to which Accident Fund Group was entitled, namely: Defendant and her Company King Medical Management, paid kickbacks (in the form of profit sharing) to physicians to procured prescriptions for Compound Transdermal creams which were manufactured by Steven's Pharmacy and dispensed at the physician's office).

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1 COUNT 3: On or about and between April 04, 2013 and December
2 09, 2013, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of Accident Fund Group to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 Accident Fund Group was entitled, namely: Defendant and her
11 Company Monarch Medical Group, paid kickbacks to physicians to
12 procure prescriptions for Compound transdermal creams
13 manufactured by Steven's Pharmacy and failed to disclose that
14 she only paid Steven's Pharmacy \$40 for each 120 gram tube.

11 COUNT 4: On or about and between April 04, 2013 and September
12 14, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of Accident Fund Group to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 Accident Fund Group was entitled, namely: Defendant and her
21 Company One Source Labs Inc. and King Medical Management Inc.,
22 paid kickbacks to physicians to procure orders for urine
23 toxicology for workers' compensation patients and paid \$60 flat
24 rate for the quantitative tests performed by Pacific Toxicology.

21 COUNT 5: On or about and between April 04, 2013 and July 28,
22 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of AIG to an insurance benefit and payment, and to
the amount of a benefit and payment to which AIG was entitled,
namely: Defendant and her Company King Medical Management, paid
kickbacks to physicians to procure prescriptions for Compound
Transdermal creams which were manufactured by Steven's Pharmacy
and dispensed at the physician's office.

1 COUNT 6: On or about and between April 04, 2013 and July 31,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of AIG to an insurance benefit and payment, and to
9 the amount of a benefit and payment to which AIG was entitled,
10 namely: Defendant and her Company Monarch Medical Group, paid
11 kickbacks to physicians to procure prescriptions for Compound
12 transdermal creams manufactured by Steven's Pharmacy and failed
13 to disclose that she only paid Steven's Pharmacy \$40 for each
14 120 gram tube.

11 COUNT 7: On or about and between April 04, 2013 and July 31,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of AIG to an insurance benefit and payment, and to
19 the amount of a benefit and payment to which AIG was entitled,
20 namely: Defendant and her Company One Source Labs Inc. and King
21 Medical Management Inc., paid kickbacks to physicians to
22 procure orders for urine toxicology for workers compensation
23 patients and paid \$60 flat rate for the quantitative tests
24 performed by Pacific Toxicology.

21 COUNT 8: On or about and between April 12, 2013 and January 29,
22 2016, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of Allianz to an insurance benefit and payment, and
to the amount of a benefit and payment to which Allianz was
entitled, namely: Defendant and her Company King Medical
Management, paid kickbacks to physicians to procure
prescriptions for Compound Transdermal creams which were
manufactured by Steven's Pharmacy and dispensed at the
physician's office.

1 COUNT 9: On or about and between April 12, 2013 and January 29,
2 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of Allianz to an insurance benefit and payment, and
9 to the amount of a benefit and payment to which Allianz was
10 entitled, namely: Defendant and her Company Monarch Medical
11 Group, paid kickbacks to physicians to procured prescriptions
12 for Compound transdermal creams manufactured by Steven's
13 Pharmacy and failed to disclose that she only paid Steven's
14 Pharmacy \$40 for each 120 gram tube.

11 COUNT 10: On or about and between April 12, 2013 and January
12 29, 2016, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of Allianz to an insurance benefit and payment, and
19 to the amount of a benefit and payment to which Allianz was
20 entitled, namely: Defendant and her Company One Source Labs Inc.
21 and King Medical Management Inc., paid kickbacks to physicians
22 to procured orders for urine toxicology for workers compensation
23 patients and paid \$60 flat rate for the quantitative tests
24 performed by Pacific Toxicology.

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1 COUNT 11: On or about and between February 18, 2014 and
2 February 02, 2016, in violation of Section 550(b)(3) of the
3 Penal Code (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING,
4 with the intent to defraud, did unlawfully conceal and
5 knowingly fail to disclose, and did knowingly assist with
6 another person to conceal and fail to disclose the occurrence of
7 an event and a fact that affected the initial and continued
8 material right and entitlement of Berkshire Hathaway Homestead
9 Companies to an insurance benefit and payment, and to the amount
10 of a benefit and payment to which Berkshire Hathaway Homestead
11 Companies was entitled, namely: Defendant and her Company King
12 Medical Management, paid kickbacks to physicians to procured
13 prescriptions for Compound Transdermal creams which were
14 manufactured by Steven's Pharmacy and dispensed at the
15 physician's office.

16
17 COUNT 12: On or about and between February 18, 2014 and October
18 23, 2014, in violation of Section 550(b)(3) of the Penal Code
19 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
20 intent to defraud, did unlawfully conceal and knowingly fail to
21 disclose, and did knowingly assist with another person to
22 conceal and fail to disclose the occurrence of an event and a
23 fact that affected the initial and continued material right and
24 entitlement of Berkshire Hathaway Homestead Companies to an
25 insurance benefit and payment, and to the amount of a benefit
26 and payment to which Berkshire Hathaway Homestead Companies was
27 entitled, namely: Defendant and her Company Monarch Medical
28 Group, paid kickbacks to physicians to procured prescriptions
for Compound transdermal creams manufactured by Steven's
Pharmacy and failed to disclose that she only paid Steven's
Pharmacy \$40 for each 120 gram tube.

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1 COUNT 13: On or about and between December 30, 2013 and
2 September 04, 2014, in violation of Section 550(b)(3) of the
3 Penal Code (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING,
4 with the intent to defraud, did unlawfully conceal and
5 knowingly fail to disclose, and did knowingly assist with
6 another person to conceal and fail to disclose the occurrence of
7 an event and a fact that affected the initial and continued
8 material right and entitlement of Berkshire Hathaway Homestead
9 Companies to an insurance benefit and payment, and to the amount
10 of a benefit and payment to which Berkshire Hathaway Homestead
11 Companies was entitled, namely: Defendant and her Company One
12 Source Labs Inc. and King Medical Management Inc., paid
13 kickbacks to physicians to procured orders for urine toxicology
14 for workers compensation patients and paid \$60 flat rate for the
15 quantitative tests performed by Pacific Toxicology.

16
17 COUNT 14: On or about and between April 04, 2013 and September
18 24, 2015, in violation of Section 550(b)(3) of the Penal Code
19 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
20 intent to defraud, did unlawfully conceal and knowingly fail to
21 disclose, and did knowingly assist with another person to
22 conceal and fail to disclose the occurrence of an event and a
23 fact that affected the initial and continued material right and
24 entitlement of California Insurance Company Applied Underwriters
25 to an insurance benefit and payment, and to the amount of a
26 benefit and payment to which California Insurance Company
27 Applied Underwriters was entitled, namely: Defendant and her
28 Company King Medical Management, paid to physicians to procured
prescriptions for Compound Transdermal creams which were
manufactured by Steven's Pharmacy and dispensed at the
physician's office.

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1 COUNT 15: On or about and between April 04, 2013 and September
2 24, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of California Insurance Company Applied Underwriters
9 to an insurance benefit and payment, and to the amount of a
10 benefit and payment to which California Insurance Company
Applied Underwriters was entitled, namely: Defendant and her
Company Monarch Medical Group, paid kickbacks to physicians to
distribute oral medications that MMG purchased from
Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
AS Medication Solutions.

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12 COUNT 16: On or about and between April 04, 2013 and September
13 26, 2015, in violation of Section 550(b)(3) of the Penal Code
14 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
15 intent to defraud, did unlawfully conceal and knowingly fail to
16 disclose, and did knowingly assist with another person to
17 conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of California Insurance Company Applied Underwriters
20 to an insurance benefit and payment, and to the amount of a
benefit and payment to which California Insurance Company
Applied Underwriters was entitled, namely: Defendant and her
Company One Source Labs Inc and King Medical Management Inc,
paid kickbacks to physicians to procure orders for urine
toxicology for workers compensation patients and paid \$60 flat
rate for the quantitative tests performed by Pacific Toxicology.

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1 COUNT 17: On or about and between April 04, 2013 and September
2 02, 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of Crum & Forester to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 Crum & Forester was entitled, namely: Defendant and her Company
11 King Medical Management, paid \$15 for the 72-hour supply of the
12 compound transdermal creams to Steven's Pharmacy, and recruited
13 physicians to distribute the creams in return for a share in the
14 net profit on the payments made on the claim.

11 COUNT 18: On or about and between April 04, 2013 and July 22,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of Crum & Forester to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 Crum & Forester was entitled, namely: Defendant and her Company
21 Monarch Medical Group, paid kickbacks to physicians to procure
22 prescriptions for Compound transdermal creams manufactured by
23 Steven's Pharmacy and failed to disclose that she only paid
24 Steven's Pharmacy \$40 for each 120 gram tube.

21 COUNT 19: On or about and between April 04, 2013 and October
22 02, 2014, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of Crum & Forester to an insurance benefit and
29 payment, and to the amount of a benefit and payment to which
30 Crum & Forester was entitled, namely: Defendant and her Company
31 One Source Labs Inc. and King Medical Management Inc., paid
32 kickbacks to physicians to procure orders for urine toxicology
33 for workers compensation patients and paid \$60 flat rate for the
34 quantitative tests performed by Pacific Toxicology.

1 COUNT 20: On or about and between April 04, 2013 and September
2 26, 2013, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of Walt Disney World Entertainment & Disney to an
9 insurance benefit and payment, and to the amount of a benefit
10 and payment to which Walt Disney World Entertainment & Disney
11 was entitled, namely: Defendant and her Company King Medical
12 Management, paid \$15 for the 72-hour supply of the compound
13 transdermal creams to Steven's Pharmacy, and recruited
14 physicians to distribute the creams in return for a share in the
15 net profit on the payments made on the claim.

11 COUNT 21: On or about and between April 04, 2013 and September
12 24, 2014, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of Walt Disney World Entertainment & Disney to an
19 insurance benefit and payment, and to the amount of a benefit
20 and payment to which Walt Disney World Entertainment & Disney
21 was entitled, namely: Defendant and her Company Monarch Medical
22 Group, paid kickbacks to physicians to procured prescriptions
23 for Compound transdermal creams manufactured by Steven's
24 Pharmacy and failed to disclose that she only paid Steven's
25 Pharmacy \$40 for each 120 gram tube.

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1 COUNT 22: On or about and between April 04, 2013 and February
2 09, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of Walt Disney World Entertainment & Disney to an
9 insurance benefit and payment, and to the amount of a benefit
10 and payment to which Walt Disney World Entertainment & Disney
11 was entitled, namely: Defendant and her Company Monarch Medical
12 Group, paid kickbacks to physicians to procured prescriptions
13 for Compound transdermal creams manufactured by Steven's
14 Pharmacy and failed to disclose that she only paid Steven's
15 Pharmacy \$40 for each 120 gram tube

16 COUNT 23: On or about and between August 19, 2013 and May 08,
17 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of Walt Disney World Entertainment & Disney to an
24 insurance benefit and payment, and to the amount of a benefit
25 and payment to which Walt Disney World Entertainment & Disney
26 was entitled, namely: Defendant and her Company One Source Labs
27 Inc. and King Medical Management Inc., paid kickbacks to
28 physicians to procured orders for urine toxicology for workers
compensation patients and paid \$60 flat rate for the
quantitative tests performed by Pacific Toxicology

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1 COUNT 24: On or about and between April 04, 2013 and June 05,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of Employers to an insurance benefit and payment,
9 and to the amount of a benefit and payment to which Employers
10 was entitled, namely: Defendant and her Company King Medical
11 Management, paid \$15 for the 72-hour supply of the compound
12 transdermal creams to Steven's Pharmacy, and recruited
13 physicians to distribute the creams in return for a share in the
14 net profit on the payments made on the claim.

11 COUNT 25: On or about and between April 04, 2013 and February
12 25, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of Employers to an insurance benefit and payment,
19 and to the amount of a benefit and payment to which Employers
20 was entitled, namely: Defendant and her Company Monarch Medical
21 Group, paid kickbacks to physicians to procured prescriptions
22 for Compound transdermal creams manufactured by Steven's
23 Pharmacy and failed to disclose that she only paid Steven's
24 Pharmacy \$40 for each 120 gram tube.

21 COUNT 26: On or about and between April 04, 2013 and September
22 09, 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of Employers to an insurance benefit and payment,
and to the amount of a benefit and payment to which Employers
was entitled, namely: Defendant and her Company Monarch Medical
Group, paid kickbacks to physicians to distribute oral
medications that MMG purchased from Pharmaceutical Wholesalers
including NuCare Pharmaceuticals and AS Medication Solutions.

1 COUNT 27: On or about and between April 04, 2013 and September
2 15, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of Employers to an insurance benefit and payment,
9 and to the amount of a benefit and payment to which Employers
10 was entitled, namely: Defendant and her Company One Source Labs
11 Inc. and King Medical Management Inc., paid kickbacks to
12 physicians to procured orders for urine toxicology for workers
13 compensation patients and paid \$60 flat rate for the
14 quantitative tests performed by Pacific Toxicology.

11 COUNT 28: On or about and between April 04, 2013 and December
12 11, 2014, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of FARMERS INSURANCE to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 FARMERS INSURANCE was entitled, namely: Defendant and her
21 Company King Medical Management, paid \$15 for the 72-hour
22 supply of the compound transdermal creams to Steven's Pharmacy,
23 and recruited physicians to distribute the creams in return for
24 a share in the net profit on the payments made on the claim.

21 COUNT 29: On or about and between April 04, 2013 and February
22 06, 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of FARMERS INSURANCE to an insurance benefit and
payment, and to the amount of a benefit and payment to which
FARMERS INSURANCE was entitled, namely: Defendant and her
Company Monarch Medical Group, paid kickbacks to physicians to
procured prescriptions for Compound transdermal creams
manufactured by Steven's Pharmacy and failed to disclose that
she only paid Steven's Pharmacy \$40 for each 120 gram tube.

1 COUNT 30: On or about and between April 23, 2014 and January
2 08, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of FARMERS INSURANCE to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 FARMERS INSURANCE was entitled, namely: Defendant and her
11 Company Monarch Medical Group, paid kickbacks to physicians to
12 distribute oral medications that MMG purchased from
13 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
14 AS Medication Solutions.

11 COUNT 31: On or about and between April 04, 2013 and September
12 17, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of FARMERS INSURANCE to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 FARMERS INSURANCE was entitled, namely: Defendant and her
21 Company One Source Labs Inc. and King Medical Management Inc.
22 paid kickbacks to physicians to procured orders for urine
23 toxicology for workers compensation patients and paid \$60 flat
24 rate for the quantitative tests performed by Pacific Toxicology

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1 COUNT 32: On or about and between April 04, 2013 and September
2 14, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of ICW GROUP INSURANCE COMPANIES to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which ICW GROUP INSURANCE COMPANIES was entitled, namely:
11 Defendant and her Company King Medical Management, paid
12 kickbacks (in the form of profit sharing) to physicians to
13 procure prescriptions for Compound Transdermal creams which
14 were manufactured by Steven's Pharmacy and dispensed at the
15 physician's office

16 COUNT 33: On or about and between April 04, 2013 and September
17 15, 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of ICW GROUP INSURANCE COMPANIES to an insurance
24 benefit and payment, and to the amount of a benefit and payment
25 to which ICW GROUP INSURANCE COMPANIES was entitled, namely:
26 Defendant and her Company Monarch Medical Group, paid kickbacks
27 to physicians to procure prescriptions for Compound transdermal
28 creams manufactured by Steven's Pharmacy and failed to disclose
that she only paid Steven's Pharmacy \$40 for each 120 gram tube

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1 COUNT 34: On or about and between April 04, 2013 and September
2 17, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of ICW GROUP INSURANCE COMPANIES to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which ICW GROUP INSURANCE COMPANIES was entitled, namely:
11 Defendant and her Company Monarch Medical Group, paid kickbacks
12 to physicians to distribute oral medications that MMG purchased
13 from Pharmaceutical Wholesalers including NuCare Pharmaceuticals
14 and AS Medication Solutions

15 COUNT 35: On or about and between April 04, 2013 and September
16 08, 2015, in violation of Section 550(b)(3) of the Penal Code
17 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
18 intent to defraud, did unlawfully conceal and knowingly fail to
19 disclose, and did knowingly assist with another person to
20 conceal and fail to disclose the occurrence of an event and a
21 fact that affected the initial and continued material right and
22 entitlement of ICW GROUP INSURANCE COMPANIES to an insurance
23 benefit and payment, and to the amount of a benefit and payment
24 to which ICW GROUP INSURANCE COMPANIES was entitled, namely:
25 Defendant and her Company One Source Labs Inc. and King Medical
26 Management Inc., paid kickbacks to physicians to procured orders
27 for urine toxicology for workers compensation patients and paid
28 \$60 flat rate for the quantitative tests performed by Pacific
Toxicology

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1 COUNT 36: On or about and between April 04, 2013 and August 08,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of City of Los Angeles to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 City of Los Angeles was entitled, namely: Defendant and her
11 Company One Source Labs Inc. and King Medical Management Inc.,
12 paid kickbacks to physicians to procured orders for urine
13 toxicology for workers compensation patients and paid \$60 flat
14 rate for the quantitative tests performed by Pacific Toxicology

11 COUNT 37: On or about and between April 04, 2013 and May 08,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of City of Los Angeles to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 City of Los Angeles was entitled, namely: Defendant and her
21 Company Monarch Medical Group, paid kickbacks to physicians to
22 distribute oral medications that MMG purchased from
23 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
24 AS Medication Solutions

21 COUNT 38: On or about and between April 04, 2013 and December
22 11, 2013, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of City of Los Angeles to an insurance benefit and
29 payment, and to the amount of a benefit and payment to which
30 City of Los Angeles was entitled, namely: Defendant and her
31 Company Monarch Medical Group, paid kickbacks to physicians to
32 procure prescriptions for Compound transdermal creams
33 manufactured by Steven's Pharmacy and failed to disclose that
34 she only paid Steven's Pharmacy \$40 for each 120 gram tube

1 COUNT 39: On or about and between April 04, 2013 and September
2 30, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of LIBERTY MUTUAL INSURANCE CO. to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which LIBERTY MUTUAL INSURANCE CO. was entitled, namely:
11 Defendant and her Company One Source Labs Inc. and King Medical
12 Management Inc., paid kickbacks to physicians to procured orders
13 for urine toxicology for workers compensation patients and paid
14 \$60 flat rate for the quantitative tests performed by Pacific
15 Toxicology

16 COUNT 40: On or about and between April 04, 2013 and March 31,
17 2016, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of LIBERTY MUTUAL INSURANCE CO. to an insurance
24 benefit and payment, and to the amount of a benefit and payment
25 to which LIBERTY MUTUAL INSURANCE CO. was entitled, namely:
26 Defendant and her Company Monarch Medical Group, paid kickbacks
27 to physicians to distribute oral medications that MMG purchased
28 from Pharmaceutical Wholesalers including NuCare Pharmaceuticals
and AS Medication Solutions

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1 COUNT 41: On or about and between April 04, 2013 and August 30,
2 2013, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of LIBERTY MUTUAL INSURANCE CO. to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which LIBERTY MUTUAL INSURANCE CO. was entitled, namely:
11 Defendant and her Company Monarch Medical Group, paid kickbacks
12 to physicians to procured prescriptions for Compound transdermal
13 creams manufactured by Steven's Pharmacy and failed to disclose
14 that she only paid Steven's Pharmacy \$40 for each 120 gram tube.

11 COUNT 42: On or about and between April 04, 2013 and September
12 28, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of LIBERTY MUTUAL INSURANCE CO. to an insurance
19 benefit and payment, and to the amount of a benefit and payment
20 to which LIBERTY MUTUAL INSURANCE CO. was entitled, namely:
21 Defendant and her Company King Medical Management, paid \$15 for
22 the 72-hour supply of the compound transdermal creams to
23 Steven's Pharmacy, and recruited physicians to distribute the
24 creams in return for a share in the net profit on the payments
25 made on the claim.

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1 COUNT 43: On or about and between July 08, 2014 and April 22,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of LOS ANGELES DEPARTMENT OF WATER & POWER to an
9 insurance benefit and payment, and to the amount of a benefit
10 and payment to which LOS ANGELES DEPARTMENT OF WATER & POWER was
11 entitled, namely: Defendant and her Company One Source Labs Inc.
12 and King Medical Management Inc., paid kickbacks to physicians
13 to procured orders for urine toxicology for workers compensation
14 patients and paid \$60 flat rate for the quantitative tests
15 performed by Pacific Toxicology.

16 COUNT 44: On or about and between April 04, 2013 and September
17 23, 2014, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of LOS ANGELES DEPARTMENT OF WATER & POWER to an
24 insurance benefit and payment, and to the amount of a benefit
25 and payment to which LOS ANGELES DEPARTMENT OF WATER & POWER was
26 entitled, namely: Defendant and her Company Monarch Medical
27 Group, paid kickbacks to physicians to procured prescriptions
28 for Compound transdermal creams manufactured by Steven's
Pharmacy and failed to disclose that she only paid Steven's
Pharmacy \$40 for each 120 gram tube.

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1 COUNT 45: On or about and between July 07, 2014 and April 20,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of LOS ANGELES DEPARTMENT OF WATER & POWER to an
9 insurance benefit and payment, and to the amount of a benefit
10 and payment to which LOS ANGELES DEPARTMENT OF WATER & POWER was
entitled, namely: Defendant and her Company King Medical
Management, paid \$15 for the 72-hour supply of the compound
transdermal creams to Steven's Pharmacy, and recruited
physicians to distribute the creams in return for a share in the
net profit on the payments made on the claim.

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12 COUNT 46: On or about and between April 04, 2013 and May 01,
13 2015, in violation of Section 550(b)(3) of the Penal Code
14 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
15 intent to defraud, did unlawfully conceal and knowingly fail to
16 disclose, and did knowingly assist with another person to
17 conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of MARKEL (FIRSTCOMP) to an insurance benefit and
20 payment, and to the amount of a benefit and payment to which
MARKEL (FIRSTCOMP) was entitled, namely: Defendant and her
Company One Source Labs Inc. and King Medical Management Inc.,
paid kickbacks to physicians to procured orders for urine
toxicology for workers compensation patients and paid \$60 flat
rate for the quantitative tests performed by Pacific Toxicology.

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1 COUNT 47: On or about and between April 04, 2013 and January
2 29, 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of MARKEL (FIRSTCOMP) to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 MARKEL (FIRSTCOMP) was entitled, namely: Defendant and her
11 Company Monarch Medical Group, paid kickbacks to physicians to
12 distribute oral medications that MMG purchased from
13 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
14 AS Medication Solutions.

11 COUNT 48: On or about and between April 04, 2013 and July 08,
12 2016, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of MARKEL (FIRSTCOMP) to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 MARKEL (FIRSTCOMP) was entitled, namely: Defendant and her
21 Company Monarch Medical Group, paid kickbacks to physicians to
22 procure prescriptions for Compound transdermal creams
23 manufactured by Steven's Pharmacy and failed to disclose that
24 she only paid Steven's Pharmacy \$40 for each 120 gram tube.

21 COUNT 49: On or about and between April 04, 2013 and September
22 08, 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of MARKEL (FIRSTCOMP) to an insurance benefit and
payment, and to the amount of a benefit and payment to which
MARKEL (FIRSTCOMP) was entitled, namely: Defendant and her
Company King Medical Management, paid \$15 for the 72-hour supply
of the compound transdermal creams to Steven's Pharmacy, and
recruited physicians to distribute the creams in return for a
share in the net profit on the payments made on the claim.

1 COUNT 50: On or about and between April 04, 2013 and March 05,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of PACIFIC COMPENSATION INSURANCE COMPANY to an
9 insurance benefit and payment, and to the amount of a benefit
10 and payment to which PACIFIC COMPENSATION INSURANCE COMPANY was
entitled, namely: Defendant and her Company One Source Labs Inc.
and King Medical Management Inc., paid kickbacks to physicians
to procured orders for urine toxicology for workers compensation
patients and paid \$60 flat rate for the quantitative tests
performed by Pacific Toxicology.

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12 COUNT 51: On or about and between April 04, 2013 and August 04,
13 2015, in violation of Section 550(b)(3) of the Penal Code
14 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
15 intent to defraud, did unlawfully conceal and knowingly fail to
16 disclose, and did knowingly assist with another person to
17 conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of PACIFIC COMPENSATION INSURANCE COMPANY to an
20 insurance benefit and payment, and to the amount of a benefit
and payment to which PACIFIC COMPENSATION INSURANCE COMPANY was
entitled, namely: Defendant and her Company Monarch Medical
Group, paid kickbacks to physicians to distribute oral
medications that MMG purchased from Pharmaceutical Wholesalers
including NuCare Pharmaceuticals and AS Medication Solutions.

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1 COUNT 52: On or about and between April 04, 2013 and October
2 15, 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of PACIFIC COMPENSATION INSURANCE COMPANY to an
9 insurance benefit and payment, and to the amount of a benefit
10 and payment to which PACIFIC COMPENSATION INSURANCE COMPANY was
entitled, namely: Defendant and her Company Monarch Medical
Group, paid kickbacks to physicians to procured prescriptions
for Compound transdermal creams manufactured by Steven's
Pharmacy and failed to disclose that she only paid Steven's
Pharmacy \$40 for each 120 gram tube.

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12 COUNT 53: On or about and between April 04, 2013 and March 09,
13 2015, in violation of Section 550(b)(3) of the Penal Code
14 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
15 intent to defraud, did unlawfully conceal and knowingly fail to
16 disclose, and did knowingly assist with another person to
17 conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of PACIFIC COMPENSATION INSURANCE COMPANY to an
20 insurance benefit and payment, and to the amount of a benefit
and payment to which PACIFIC COMPENSATION INSURANCE COMPANY was
entitled, namely: Defendant and her Company King Medical
Management, paid \$15 for the 72-hour supply of the compound
transdermal creams to Steven's Pharmacy, and recruited
physicians to distribute the creams in return for a share in the
net profit on the payments made on the claim.

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1 COUNT 54: On or about and between June 03, 2013 and March 02,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of PROBE to an insurance benefit and payment, and to
9 the amount of a benefit and payment to which PROBE was entitled,
10 namely: Defendant and her Company One Source Labs Inc. and King
11 Medical Management Inc., paid kickbacks to physicians to
12 procure orders for urine toxicology for workers compensation
13 patients and paid \$60 flat rate for the quantitative tests
14 performed by Pacific Toxicology.

15 COUNT 55: On or about and between April 04, 2013 and October
16 28, 2015, in violation of Section 550(b)(3) of the Penal Code
17 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
18 intent to defraud, did unlawfully conceal and knowingly fail to
19 disclose, and did knowingly assist with another person to
20 conceal and fail to disclose the occurrence of an event and a
21 fact that affected the initial and continued material right and
22 entitlement of REPUBLIC INDEMNITY OF AMERICA to an insurance
23 benefit and payment, and to the amount of a benefit and payment
24 to which REPUBLIC INDEMNITY OF AMERICA was entitled, namely:
25 Defendant and her Company One Source Labs Inc. and King Medical
26 Management Inc., paid kickbacks to physicians to procure orders
27 for urine toxicology for workers compensation patients and paid
28 \$60 flat rate for the quantitative tests performed by Pacific
Toxicology.

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1 COUNT 56: On or about and between April 04, 2013 and September
2 14, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of REPUBLIC INDEMNITY OF AMERICA to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which REPUBLIC INDEMNITY OF AMERICA was entitled, namely:
11 Defendant and her Company Monarch Medical Group, paid kickbacks
12 to physicians to distribute oral medications that MMG purchased
13 from Pharmaceutical Wholesalers including NuCare Pharmaceuticals
14 and AS Medication Solutions.

11 COUNT 57: On or about and between April 04, 2013 and June 01,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of REPUBLIC INDEMNITY OF AMERICA to an insurance
19 benefit and payment, and to the amount of a benefit and payment
20 to which REPUBLIC INDEMNITY OF AMERICA was entitled, namely:
21 Defendant and her Company Monarch Medical Group, paid kickbacks
22 to physicians to procure prescriptions for Compound transdermal
23 creams manufactured by Steven's Pharmacy and failed to disclose
24 that she only paid Steven's Pharmacy \$40 for each 120 gram tube.

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1 COUNT 58: On or about and between April 04, 2013 and September
2 24, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of REPUBLIC INDEMNITY OF AMERICA to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which REPUBLIC INDEMNITY OF AMERICA was entitled, namely:
11 Defendant and her Company King Medical Management, paid \$15 for
12 the 72-hour supply of the compound transdermal creams to
13 Steven's Pharmacy, and recruited physicians to distribute the
14 creams in return for a share in the net profit on the payments
15 made on the claim.

16 COUNT 59: On or about and between April 04, 2013 and September
17 01, 2016, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of STATE COMPENSATION INSURANCE FUND to an insurance
24 benefit and payment, and to the amount of a benefit and payment
25 to which STATE COMPENSATION INSURANCE FUND was entitled, namely:
26 Defendant and her Company One Source Labs Inc. and King Medical
27 Management Inc., paid kickbacks to physicians to procured orders
28 for urine toxicology for workers compensation patients and paid
\$60 flat rate for the quantitative tests performed by Pacific
Toxicology.

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1 COUNT 60: On or about and between April 04, 2013 and November
2 21, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of STATE COMPENSATION INSURANCE FUND to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which STATE COMPENSATION INSURANCE FUND was entitled, namely:
11 Defendant and her Company Monarch Medical Group, paid kickbacks
12 to physicians to distribute oral medications that MMG purchased
13 from Pharmaceutical Wholesalers including NuCare Pharmaceuticals
14 and AS Medication Solutions

11 COUNT 61: On or about and between April 04, 2013 and April 28,
12 2016, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of STATE COMPENSATION INSURANCE FUND to an insurance
19 benefit and payment, and to the amount of a benefit and payment
20 to which STATE COMPENSATION INSURANCE FUND was entitled, namely:
21 Defendant and her Company Monarch Medical Group, paid kickbacks
22 to physicians to procure prescriptions for Compound transdermal
23 creams manufactured by Steven's Pharmacy and failed to disclose
24 that she only paid Steven's Pharmacy \$40 for each 120 gram tube

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1 COUNT 62: On or about and between April 04, 2013 and April 28,
2 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of STATE COMPENSATION INSURANCE FUND to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which STATE COMPENSATION INSURANCE FUND was entitled, namely:
11 Defendant and her Company King Medical Management, paid \$15 for
12 the 72-hour supply of the compound transdermal creams to
13 Steven's Pharmacy, and recruited physicians to distribute the
14 creams in return for a share in the net profit on the payments
15 made on the claim.

16 COUNT 63: On or about and between April 04, 2013 and October
17 02, 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of THE HARTFORD FINANCIAL SERVICES to an insurance
24 benefit and payment, and to the amount of a benefit and payment
25 to which THE HARTFORD FINANCIAL SERVICES was entitled, namely:
26 Defendant and her Company One Source Labs Inc. and King Medical
27 Management Inc., paid kickbacks to physicians to procured orders
28 for urine toxicology for workers compensation patients and paid
\$60 flat rate for the quantitative tests performed by Pacific
Toxicology

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1 COUNT 64: On or about and between April 04, 2013 and September
2 10, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of THE HARTFORD FINANCIAL SERVICES to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which THE HARTFORD FINANCIAL SERVICES was entitled, namely:
11 Defendant and her Company Monarch Medical Group, paid kickbacks
12 to physicians to distribute oral medications that MMG purchased
13 from Pharmaceutical Wholesalers including NuCare Pharmaceuticals
14 and AS Medication Solutions.

11 COUNT 65: On or about and between February 26, 2015 and July
12 08, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of THE HARTFORD FINANCIAL SERVICES to an insurance
19 benefit and payment, and to the amount of a benefit and payment
20 to which THE HARTFORD FINANCIAL SERVICES was entitled, namely:
21 Defendant and her Company Monarch Medical Group, paid kickbacks
22 to physicians to procure prescriptions for Compound transdermal
23 creams manufactured by Steven's Pharmacy and failed to disclose
24 that she only paid Steven's Pharmacy \$40 for each 120 gram tube.

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1 COUNT 66: On or about and between April 04, 2013 and September
2 03, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of THE HARTFORD FINANCIAL SERVICES to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which THE HARTFORD FINANCIAL SERVICES was entitled, namely:
11 Defendant and her Company King Medical Management, paid \$15 for
12 the 72-hour supply of the compound transdermal creams to
13 Steven's Pharmacy, and recruited physicians to distribute the
14 creams in return for a share in the net profit on the payments
15 made on the claim.

16 COUNT 67: On or about and between April 04, 2013 and October
17 27, 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of TOTAL HEALTH AND PRODUCTIVITY MANAGEMENT to an
24 insurance benefit and payment, and to the amount of a benefit
25 and payment to which TOTAL HEALTH AND PRODUCTIVITY MANAGEMENT
26 was entitled, namely: Defendant and her Company One Source Labs
27 Inc. and King Medical Management Inc., paid kickbacks to
28 physicians to procured orders for urine toxicology for workers
compensation patients and paid \$60 flat rate for the
quantitative tests performed by Pacific Toxicology

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1 COUNT 68: On or about and between April 04, 2013 and March 10,
2 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of TOTAL HEALTH AND PRODUCTIVITY MANAGEMENT to an
9 insurance benefit and payment, and to the amount of a benefit
10 and payment to which TOTAL HEALTH AND PRODUCTIVITY MANAGEMENT
11 was entitled, namely: Defendant and her Company Monarch Medical
12 Group, paid kickbacks to physicians to procured prescriptions
13 for Compound transdermal creams manufactured by Steven's
14 Pharmacy and failed to disclose that she only paid Steven's
15 Pharmacy \$40 for each 120 gram tube.

16 COUNT 69: On or about and between April 04, 2013 and February
17 16, 2016, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of TRAVELERS INSURANCE to an insurance benefit and
24 payment, and to the amount of a benefit and payment to which
25 TRAVELERS INSURANCE was entitled, namely: Defendant and her
26 Company One Source Labs Inc. and King Medical Management Inc.,
27 paid kickbacks to physicians to procured orders for urine
28 toxicology for workers compensation patients and paid \$60 flat
rate for the quantitative tests performed by Pacific Toxicology.

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1 COUNT 70: On or about and between April 04, 2013 and February
2 26, 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of TRAVELERS INSURANCE to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 TRAVELERS INSURANCE was entitled, namely: Defendant and her
11 Company Monarch Medical Group, paid kickbacks to physicians to
12 distribute oral medications that MMG purchased from
13 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
14 AS Medication Solutions

11 COUNT 71: On or about and between April 04, 2013 and September
12 29, 2014, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of TRAVELERS INSURANCE to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 TRAVELERS INSURANCE was entitled, namely: Defendant and her
21 Company Monarch Medical Group, paid kickbacks to physicians to
22 procure prescriptions for Compound transdermal creams
23 manufactured by Steven's Pharmacy and failed to disclose that
24 she only paid Steven's Pharmacy \$40 for each 120 gram tube.

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1 COUNT 72: On or about and between April 04, 2013 and September
2 02, 2014, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of TRAVELERS INSURANCE COMPANY to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which TRAVELERS INSURANCE COMPANY was entitled, namely:
11 Defendant and her Company King Medical Management, paid \$15 for
12 the 72-hour supply of the compound transdermal creams to
13 Steven's Pharmacy, and recruited physicians to distribute the
14 creams in return for a share in the net profit on the payments
15 made on the claim.

16 COUNT 73: On or about and between April 04, 2013 and November
17 02, 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of TRISTAR INSURANCE GROUP. to an insurance benefit
24 and payment, and to the amount of a benefit and payment to which
25 TRISTAR INSURANCE GROUP. was entitled, namely: Defendant and her
26 Company One Source Labs Inc. and King Medical Management Inc.,
27 paid kickbacks to physicians to procured orders for urine
28 toxicology for workers compensation patients and paid \$60 flat
rate for the quantitative tests performed by Pacific Toxicology

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1 COUNT 74: On or about and between April 04, 2013 and December
2 28, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of TRISTAR INSURANCE GROUP to an insurance benefit
9 and payment, and to the amount of a benefit and payment to which
10 TRISTAR INSURANCE GROUP was entitled, namely: Defendant and her
11 Company Monarch Medical Group, paid kickbacks to physicians to
12 distribute oral medications that MMG purchased from
13 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
14 AS Medication Solutions.

11 COUNT 75: On or about and between April 04, 2013 and November
12 05, 2013, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of TRISTAR INSURANCE GROUP to an insurance benefit
19 and payment, and to the amount of a benefit and payment to which
20 TRISTAR INSURANCE GROUP was entitled, namely: Defendant and her
21 Company Monarch Medical Group, paid kickbacks to physicians to
22 procure prescriptions for Compound transdermal creams
23 manufactured by Steven's Pharmacy and failed to disclose that
24 she only paid Steven's Pharmacy \$40 for each 120 gram tube.

21 COUNT 76: On or about and between April 04, 2013 and May 01,
22 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of TRISTAR INSURANCE GROUP to an insurance benefit
and payment, and to the amount of a benefit and payment to which
TRISTAR INSURANCE GROUP was entitled, namely: Defendant and her
Company King Medical Management, paid \$15 for the 72-hour supply
of the compound transdermal creams to Steven's Pharmacy, and
recruited physicians to distribute the creams in return for a
share in the net profit on the payments made on the claim.

1 COUNT 77: On or about and between April 04, 2013 and April 04,
2 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of YORK RISK SERVICE GROUP to an insurance benefit
9 and payment, and to the amount of a benefit and payment to which
10 YORK RISK SERVICE GROUP was entitled, namely: Defendant and her
11 Company One Source Labs Inc. and King Medical Management Inc.,
12 paid kickbacks to physicians to procured orders for urine
13 toxicology for workers compensation patients and paid \$60 flat
14 rate for the quantitative tests performed by Pacific Toxicology.

11 COUNT 78: On or about and between April 04, 2013 and December
12 15, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of YORK RISK SERVICE GROUP to an insurance benefit
19 and payment, and to the amount of a benefit and payment to which
20 YORK RISK SERVICE GROUP was entitled, namely: Defendant and her
21 Company Monarch Medical Group, paid kickbacks to physicians to
22 distribute oral medications that MMG purchased from
23 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
24 AS Medication Solutions.

21 COUNT 79: On or about and between April 04, 2013 and June 16,
22 2016, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of YORK RISK SERVICE GROUP to an insurance benefit
and payment, and to the amount of a benefit and payment to which
YORK RISK SERVICE GROUP was entitled, namely: Defendant and her
Company Monarch Medical Group, paid kickbacks to physicians to
procured prescriptions for Compound transdermal creams
manufactured by Steven's Pharmacy and failed to disclose that
she only paid Steven's Pharmacy \$40 for each 120 gram tube.

1 COUNT 80: On or about and between April 04, 2013 and October
2 16, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of YORK RISK SERVICE GROUP to an insurance benefit
9 and payment, and to the amount of a benefit and payment to which
10 YORK RISK SERVICE GROUP was entitled, namely: Defendant and her
11 Company King Medical Management, paid \$15 for the 72-hour supply
12 of the compound transdermal creams to Steven's Pharmacy, and
13 recruited physicians to distribute the creams in return for a
14 share in the net profit on the payments made on the claim.

11 COUNT 81: On or about and between April 04, 2013 and November
12 12, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of ZENITH INSURANCE to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 ZENITH INSURANCE was entitled, namely: Defendant and her Company
21 One Source Labs Inc. and King Medical Management Inc., paid
22 kickbacks to physicians to procured orders for urine toxicology
23 for workers compensation patients and paid \$60 flat rate for the
24 quantitative tests performed by Pacific Toxicology.

21 COUNT 82: On or about and between April 04, 2013 and June 15,
22 2016, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of ZENITH INSURANCE to an insurance benefit and
29 payment, and to the amount of a benefit and payment to which
30 ZENITH INSURANCE was entitled, namely: Defendant and her Company
31 Monarch Medical Group, paid kickbacks to physicians to
32 distribute oral medications that MMG purchased from
33 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
34 AS Medication Solutions.

1 COUNT 83: On or about and between April 04, 2013 and August 04,
2 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of ZENITH INSURANCE to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 ZENITH INSURANCE was entitled, namely: Defendant and her Company
11 Monarch Medical Group, paid kickbacks to physicians to procure
12 prescriptions for Compound transdermal creams manufactured by
13 Steven's Pharmacy and failed to disclose that she only paid
14 Steven's Pharmacy \$40 for each 120 gram tube.

11 COUNT 84: On or about and between April 04, 2013 and March 18,
12 2014, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of ZENITH INSURANCE to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 ZENITH INSURANCE was entitled, namely: Defendant and her Company
21 King Medical Management, paid \$15 for the 72-hour supply of the
22 compound transdermal creams to Steven's Pharmacy, and recruited
23 physicians to distribute the creams in return for a share in the
24 net profit on the payments made on the claim.

21 COUNT 85: On or about and between April 04, 2013 and July 26,
22 2016, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of ZURICH INSURANCE to an insurance benefit and
payment, and to the amount of a benefit and payment to which
ZURICH INSURANCE was entitled, namely: Defendant and her Company
One Source Labs Inc. and King Medical Management Inc., paid
kickbacks to physicians to procure orders for urine toxicology
for workers compensation patients and paid \$60 flat rate for the
quantitative tests performed by Pacific Toxicology

1 COUNT 86: On or about and between April 04, 2013 and September
2 21, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of ZURICH INSURANCE to an insurance benefit and
9 payment, and to the amount of a benefit and payment to which
10 ZURICH INSURANCE was entitled, namely: Defendant and her Company
11 Monarch Medical Group, paid kickbacks to physicians to
12 distribute oral medications that MMG purchased from
13 Pharmaceutical Wholesalers including NuCare Pharmaceuticals and
14 AS Medication Solutions.

11 COUNT 87: On or about and between April 04, 2013 and December
12 19, 2013, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of ZURICH INSURANCE to an insurance benefit and
19 payment, and to the amount of a benefit and payment to which
20 ZURICH INSURANCE was entitled, namely: Defendant and her Company
21 Monarch Medical Group, paid kickbacks to physicians to procure
22 prescriptions for Compound transdermal creams manufactured by
23 Steven's Pharmacy and failed to disclose that she only paid
24 Steven's Pharmacy \$40 for each 120 gram tube.

21 COUNT 88: On or about and between April 04, 2013 and December
22 31, 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
24 intent to defraud, did unlawfully conceal and knowingly fail to
25 disclose, and did knowingly assist with another person to
26 conceal and fail to disclose the occurrence of an event and a
27 fact that affected the initial and continued material right and
28 entitlement of ZURICH INSURANCE to an insurance benefit and
payment, and to the amount of a benefit and payment to which
ZURICH INSURANCE was entitled, namely: Defendant and her Company
King Medical Management, paid \$15 for the 72-hour supply of the
compound transdermal creams to Steven's Pharmacy, and recruited
physicians to distribute the creams in return for a share in the
net profit on the payments made on the claim.

1 COUNT 89: On or about and between April 04, 2013 and August 13,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of US DEPARTMENT OF LABOR - TREASURY to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which US DEPARTMENT OF LABOR - TREASURY was entitled, namely:
11 Defendant and her Company One Source Labs Inc. and King Medical
12 Management Inc., paid kickbacks to physicians to procured orders
13 for urine toxicology for workers compensation patients and paid
14 \$60 flat rate for the quantitative tests performed by Pacific
15 Toxicology

16 COUNT 90: On or about and between April 04, 2013 and August 13,
17 2015, in violation of Section 550(b)(3) of the Penal Code
18 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
19 intent to defraud, did unlawfully conceal and knowingly fail to
20 disclose, and did knowingly assist with another person to
21 conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of US DEPARTMENT OF LABOR - TREASURY to an insurance
24 benefit and payment, and to the amount of a benefit and payment
25 to which US DEPARTMENT OF LABOR - TREASURY was entitled, namely:
26 Defendant and her Company Monarch Medical Group, paid kickbacks
27 to physicians to distribute oral medications that MMG purchased
28 from Pharmaceutical Wholesalers including NuCare Pharmaceuticals
and AS Medication Solutions.

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1 COUNT 91: On or about and between April 04, 2013 and August 13,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of US DEPARTMENT OF LABOR - TREASURY to an insurance
9 benefit and payment, and to the amount of a benefit and payment
10 to which US DEPARTMENT OF LABOR - TREASURY was entitled, namely:
11 Defendant and her Company Monarch Medical Group, paid kickbacks
12 to physicians to procured prescriptions for Compound transdermal
13 creams manufactured by Steven's Pharmacy and failed to disclose
14 that she only paid Steven's Pharmacy \$40 for each 120 gram tube.

11 COUNT 92: On or about and between April 04, 2013 and August 13,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the
14 intent to defraud, did unlawfully conceal and knowingly fail to
15 disclose, and did knowingly assist with another person to
16 conceal and fail to disclose the occurrence of an event and a
17 fact that affected the initial and continued material right and
18 entitlement of US DEPARTMENT OF LABOR - TREASURY to an insurance
19 benefit and payment, and to the amount of a benefit and payment
20 to which US DEPARTMENT OF LABOR - TREASURY was entitled, namely:
21 Defendant and her Company King Medical Management, paid \$15 for
22 the 72-hour supply of the compound transdermal creams to
23 Steven's Pharmacy, and recruited physicians to distribute the
24 creams in return for a share in the net profit on the payments
25 made on the claim.

21 COUNT 93: On or about April 24, 2014, in violation of Section
22 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
23 FELONY, TANYA MORELAND KING did unlawfully offer, deliver,
24 receive, and accept a rebate, refund, commission, preference,
25 patronage, dividend, discount and other consideration, as
26 compensation and inducement for referring clients and patients
27 to perform and obtain services and benefits. (Payment to
28 Starbase and Ismael Silva M.D.)

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1 COUNT 94: On or about July 21, 2014, in violation of Section
2 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
3 FELONY, TANYA MORELAND KING did unlawfully offer, deliver,
4 receive, and accept a rebate, refund, commission, preference,
5 patronage, dividend, discount and other consideration, as
6 compensation and inducement for referring clients and patients
to perform and obtain services and benefits. (Payment to
Starbase and Ismael Silva M.D.)

7 COUNT 95: On or about August 28, 2014, in violation of Section
8 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
9 FELONY, TANYA MORELAND KING did unlawfully offer, deliver,
10 receive, and accept a rebate, refund, commission, preference,
11 patronage, dividend, discount and other consideration, as
12 compensation and inducement for referring clients and patients
to perform and obtain services and benefits. (Payment to
Starbase and Ismael Silva M.D.)

13 COUNT 96: On or about November 03, 2014, in violation of Section
14 3215 of the Labor Code (REFERRAL OF CLIENTS FOR COMPENSATION), a
15 FELONY, TANYA MORELAND KING did unlawfully offer, deliver,
16 receive, and accept a rebate, refund, commission, preference,
17 patronage, dividend, discount and other consideration, as
18 compensation and inducement for referring clients and patients
to perform and obtain services and benefits. (Payment to
Starbase and Ismael Silva M.D.)

19 COUNT 97: On or about and between April 04, 2014 and January
20 15, 2015, in violation of Section 3215 of the Labor Code
21 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
22 KING did unlawfully offer, deliver, receive, and accept a
23 rebate, refund, commission, preference, patronage, dividend,
discount and other consideration, as compensation and inducement
for referring clients and patients to perform and obtain
services and benefits. (Payments to Christopher Chen M.D.)

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25 COUNT 98: On or about and between April 04, 2014 and August 12,
26 2015, in violation of Section 3215 of the Labor Code (REFERRAL
27 OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND KING did
28 unlawfully offer, deliver, receive, and accept a rebate, refund,
commission, preference, patronage, dividend, discount and other
consideration, as compensation and inducement for referring
clients and patients to perform and obtain services and
benefits. (Payments to Central Desert Industrial Medical Group)

1 COUNT 99: On or about and between August 08, 2014 and August
2 12, 2015, in violation of Section 3215 of the Labor Code
3 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
4 KING did unlawfully offer, deliver, receive, and accept a
5 rebate, refund, commission, preference, patronage, dividend,
6 discount and other consideration, as compensation and inducement
7 for referring clients and patients to perform and obtain
8 services and benefits. (Payments to Duke Ahn, M.D.)

7 COUNT 100: On or about and between May 06, 2014 and August 12,
8 2015, in violation of Section 3215 of the Labor Code (REFERRAL
9 OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND KING did
10 unlawfully offer, deliver, receive, and accept a rebate, refund,
11 commission, preference, patronage, dividend, discount and other
12 consideration, as compensation and inducement for referring
13 clients and patients to perform and obtain services and
14 benefits. (Payments to Eduardo Lin, M.D.)

13 COUNT 101: On or about and between April 04, 2014 and August
14 12, 2015, in violation of Section 3215 of the Labor Code
15 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
16 KING did unlawfully offer, deliver, receive, and accept a
17 rebate, refund, commission, preference, patronage, dividend,
18 discount and other consideration, as compensation and inducement
19 for referring clients and patients to perform and obtain
20 services and benefits. (Payments to Eric Schmidt, M.D.)

19 COUNT 102: On or about and between November 12, 2014 and August
20 12, 2015, in violation of Section 3215 of the Labor Code
21 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
22 KING did unlawfully offer, deliver, receive, and accept a
23 rebate, refund, commission, preference, patronage, dividend,
24 discount and other consideration, as compensation and inducement
25 for referring clients and patients to perform and obtain
26 services and benefits. (Payments to Jerome Robson M.D.)

25 COUNT 103: On or about and between April 09, 2014 and June 11,
26 2015, in violation of Section 3215 of the Labor Code (REFERRAL
27 OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND KING did
28 unlawfully offer, deliver, receive, and accept a rebate, refund,
commission, preference, patronage, dividend, discount and other
consideration, as compensation and inducement for referring
clients and patients to perform and obtain services and
benefits. (Payments to Mannie Joel, M.D.)

1 COUNT 104: On or about and between December 10, 2013 and August
2 12, 2015, in violation of Section 3215 of the Labor Code
3 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
4 KING did unlawfully offer, deliver, receive, and accept a
5 rebate, refund, commission, preference, patronage, dividend,
6 discount and other consideration, as compensation and inducement
7 for referring clients and patients to perform and obtain
8 services and benefits. (Payments to Parvez Fatteh, M.D.)

7 COUNT 105: On or about and between April 04, 2014 and August
8 12, 2015, in violation of Section 3215 of the Labor Code
9 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
10 KING did unlawfully offer, deliver, receive, and accept a
11 rebate, refund, commission, preference, patronage, dividend,
12 discount and other consideration, as compensation and inducement
13 for referring clients and patients to perform and obtain
14 services and benefits. (Payments to Robert Caton, M.D.)

13 COUNT 106: On or about and between April 04, 2014 and August
14 12, 2015, in violation of Section 3215 of the Labor Code
15 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
16 KING did unlawfully offer, deliver, receive, and accept a
17 rebate, refund, commission, preference, patronage, dividend,
18 discount and other consideration, as compensation and inducement
19 for referring clients and patients to perform and obtain
20 services and benefits. (Payment Stanislaus Orthopaedic Sports
21 Med Clinic)

19 COUNT 107: On or about and between April 04, 2014 and August
20 12, 2015, in violation of Section 3215 of the Labor Code
21 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
22 KING did unlawfully offer, deliver, receive, and accept a
23 rebate, refund, commission, preference, patronage, dividend,
24 discount and other consideration, as compensation and inducement
25 for referring clients and patients to perform and obtain
26 services and benefits. (Payments to Kevin Shamlou, M.D.)

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1 COUNT 108: On or about and between April 04, 2014 and August
2 12, 2015, in violation of Section 3215 of the Labor Code
3 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
4 KING did unlawfully offer, deliver, receive, and accept a
5 rebate, refund, commission, preference, patronage, dividend,
6 discount and other consideration, as compensation and inducement
7 for referring clients and patients to perform and obtain
8 services and benefits. (Payments Kevin Park, MD.)

7 COUNT 109: On or about and between April 09, 2014 and August
8 12, 2015, in violation of Section 3215 of the Labor Code
9 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
10 KING did unlawfully offer, deliver, receive, and accept a
11 rebate, refund, commission, preference, patronage, dividend,
12 discount and other consideration, as compensation and inducement
13 for referring clients and patients to perform and obtain
14 services and benefits. (Payments to Paul Stanton M.D.)

13 COUNT 110: On or about and between September 12, 2014 and
14 August 12, 2015, in violation of Section 3215 of the Labor Code
15 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
16 KING did unlawfully offer, deliver, receive, and accept a
17 rebate, refund, commission, preference, patronage, dividend,
18 discount and other consideration, as compensation and inducement
19 for referring clients and patients to perform and obtain
20 services and benefits. (Payments to Robert Fenton M.D.)

19 COUNT 111: On or about and between April 04, 2014 and August
20 12, 2015, in violation of Section 3215 of the Labor Code
21 (REFERRAL OF CLIENTS FOR COMPENSATION), a FELONY, TANYA MORELAND
22 KING did unlawfully offer, deliver, receive, and accept a
23 rebate, refund, commission, preference, patronage, dividend,
24 discount and other consideration, as compensation and inducement
25 for referring clients and patients to perform and obtain
26 services and benefits. (Payments to Eric Schmidt, MD.)

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ENHANCEMENT(S)

As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110 and 111, it is further alleged pursuant to Penal Code section 12022.6(a)(4) (PROPERTY DAMAGE OVER \$3,200,000), that TANYA MORELAND KING intentionally took, damaged, and destroyed property valued in excess of three million two hundred thousand dollars (\$3,200,000) during the commission and attempted commission of the above offense.

It is further alleged pursuant to Penal Code section 186.11(a) (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as to counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91 and 92, defendant TANYA MORELAND KING engaged in a pattern of related fraudulent felony conduct involving the taking of more than five hundred thousand dollars (\$500,000).

I declare under penalty of perjury, on information and belief, that the foregoing is true and correct.

Dated 04-03-2017 at Orange County, California.

KS/AC 17F00373

TONY RACKAUCKAS, DISTRICT ATTORNEY

by: /s/ SHADDI KAMIABIPOUR

SHADDI KAMIABIPOUR, Deputy District Attorney

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RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

TANYA MORELAND KING - \$ 500,000.00

NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.