

1 MICHAEL A. HESTRIN
2 District Attorney
3 County of Riverside
4 3960 Orange Street, First Floor
5 Riverside, California 92501
6 Telephone: (951) 955-5400
7 John Aki
8 Chief Assistant District Attorney
9 State Bar No. 189395

BAIL: Peyman Heidary \$12,402,000.00
Cary D. Abramowitz \$12,402,000.00
Ana Solis \$12,402,000.00
Gladys Ross \$12,402,000.00

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAY 16 2016

S. Heider

AM
MAY 20 2016
B

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
(Riverside)

15 THE PEOPLE OF THE STATE OF CALIFORNIA,

NO. RIF 1670175

17 Plaintiff,

18 v.

20 PEYMAN HEIDARY
21 DOB: 08/30/1970
22 AKA: BRIAN HEIDARY
23 AKA: THE GODFATHER
24 AKA: NUMBER ONE

INDICTMENT

26 CARY DAVID ABRAMOWITZ
27 DOB: 10/20/1956

AGENCY#: DAR2012258005/RDA

29 ANA SOLIS
30 DOB: 04/24/1982

32 GLADYS ROSS
33 DOB: 7/17/1962

36 Defendants.

COUNT 1

The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 182, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, they did willfully and unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of KNOWINGLY MAKING OR CAUSING TO BE MADE ANY FALSE OR FRAUDULENT CLAIMS FOR PAYMENT OF HEALTH CARE BENEFITS, in violation of Penal Code section 550, subdivision (a), subsection (6), a felony, and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendants thereafter committed the following overt act and acts at and in the County of Riverside:

OVERT ACT NO. 1

CARY DAVID ABRAMOWITZ agreed with and allowed PEYMAN HEIDARY, a non-attorney, to exert actual control over California Injury Lawyers, AKA Orange County Law Group, and AKA South Western Law Group (collectively "the Law Firm"). PEYMAN HEIDARY controlled day-to-day operations including scheduling, hiring and firing.

OVERT ACT NO. 2

The Law Firm directed patients to clinics owned and/or controlled by PEYMAN HEIDARY.

OVERT ACT NO. 3

CARY DAVID ABRAMOWITZ, as directed by PEYMAN HEIDARY, paid Cappers \$100 per patient signed up as a client of the Law Firm.

OVERT ACT NO. 4

Cappers began working for PEYMAN HEIDARY when PEYMAN HEIDARY offered Cappers a job in a new law firm opened by PEYMAN HEIDARY and Kenneth Forbes.

OVERT ACT NO. 5

Cappers had worker's compensation claimants sign blank forms, Cappers returned these forms to the Law Firm, who filled them out and submitted them, along with other paperwork, to the Worker's Compensation Appeals Board and various insurance companies.

OVERT ACT NO. 6

The Law Firm filed numerous workers' compensation claims alleging similar or identical injuries.

OVERT ACT NO. 7

Cappers sought out additional claimants from previously identified claimants.

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

OVERT ACT NO. 8

PEYMAN HEIDARY owned and/or controlled Riverside Health Clinic, Corona Health Clinic, Montebello Health Clinic, Bellflower Health Clinic, Santa Ana Health Clinic, and Anaheim Health Clinic.

OVERT ACT NO. 9

PEYMAN HEIDARY created the Clinics as Limited Liability Companies.

OVERT ACT NO. 10

PEYMAN HEIDARY moved unqualified, untrained employees between the Clinics and the Law Firm.

OVERT ACT NO. 11

PEYMAN HEIDARY controlled scheduling of doctors at the Clinics.

OVERT ACT NO. 12

PEYMAN HEIDARY controlled payments of the medical professionals at the Clinics.

OVERT ACT NO. 13

PEYMAN HEIDARY controlled patient care at the Clinics, including dictating treatments and referrals. He ordered his employees to ensure that each patient received the same or similar treatment and test studies regardless of injury.

OVERT ACT NO. 14

TOUBA PAKDEL-NABATI contributed to patient care at the Clinics, including dictating treatments and referrals. She ordered her employees to ensure that each patient received the same or similar treatment and test studies regardless of injury.

OVERT ACT NO. 15

QUYNAM NGUYEN received referrals for unnecessary treatment which led to the creation of med-legal reports he caused to be created which QUYNAM NGUYEN knew would later be submitted for billing.

OVERT ACT NO. 16

JASON YANG received referrals for unnecessary treatment which led to the creation of med-legal reports he caused to be created which JASON YANG knew would later be submitted for billing.

OVERT ACT NO. 17

The Clinics submitted bills and liens for treatments ordered by PEYMAN HEIDARY to insurance companies and the WCAB.

OVERT ACT NO. 18

The Law Firm received payments in part from Compromise and Releases from the WCAB and in part from legal fees billed to insurance companies.

OVERT ACT NO. 19

When PEYMAN HEIDARY hired medical and chiropractic professionals to work at the Clinics, he ordered said professionals to create a checking account with PEYMAN HEIDARY as a signatory so he could maintain control of that account. Once created, said professionals were not allowed to make any changes or withdrawals to the account without PEYMAN HEIDARY'S permission. PEYMAN HEIDARY further ordered that any payments made to said professionals be deposited in that professional's checking account and the professionals were paid out of that account.

OVERT ACT NO. 20

PEYMAN HEIDARY ordered said professionals to assign the all outstanding bills/accounts receivables to him. PEYMAN HEIDARY would then bundle the outstanding bills and sell them to third party collections and/or medical factoring firm.

COUNT 2

For a further and separate cause of action, being a different offense from but connected in its commission with the charge set forth in count 1 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from ACE, and the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 3

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 and 2 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the

1 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
2 fraudulent claim for payment of a health care benefit, to wit, from AMERICAN
3 INTERNATIONAL GROUP (AIG), and the claim and amount at issue exceeded Nine Hundred
4 Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine
5 Hundred Fifty dollars (\$950) in five years and six-month consecutive period.

6 It is further alleged that in the commission and attempted commission of the above
7 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ, and
8 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
9 property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6,
10 subdivision (a), subsection (1).

11 COUNT 4

12 For a further and separate cause of action, being a different offense from but connected
13 in its commission with the charges set forth in counts 1 through 3 hereof, the Criminal Grand
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
15 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
16 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
17 through and including July 15, 2014, in the County of Riverside, State of California, the
18 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
19 fraudulent claim for payment of a health care benefit, to wit, from
20 BERKSHIRE/HATHAWAY, and the claim and amount at issue exceeded Nine Hundred Fifty
21 dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred
22 Fifty dollars (\$950) in a five years and six-month consecutive period.

23 It is further alleged that in the commission and attempted commission of the above
24 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
25 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
26 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
27 subdivision (a), subsection (2).

28 COUNT 5

29 For a further and separate cause of action, being a different offense from but connected
30 in its commission with the charges set forth in counts 1 through 4 hereof, the Criminal Grand
31 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
32 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
33 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
34 through and including July 15, 2014, in the County of Riverside, State of California, the
35 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
36 fraudulent claim for payment of a health care benefit, to wit, from CNA INSURANCE, and the

1 claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate
2 amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five
3 years and six-month consecutive period.

4 It is further alleged that in the commission and attempted commission of the above
5 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
6 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
7 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
8 subdivision (a), subsection (2).

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
COUNT 6

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 5 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from CALIFORNIA
RESTAURANT MUTUAL BENEFITS CORPORATION (CRMBC), and the claim and
amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
month consecutive period.

It is further alleged that in the commission and attempted commission of the above
offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
subdivision (a), subsection (2).

COUNT 7

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 6 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from CRUM & FORESTER, and
the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate

1 amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five
2 years and six-month consecutive period.

3 It is further alleged that in the commission and attempted commission of the above
4 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
5 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
6 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
7 subdivision (a), subsection (2).

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
COUNT 8

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 7 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from EMPLOYERS, and the claim
and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
month consecutive period.

It is further alleged that in the commission and attempted commission of the above
offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
subdivision (a), subsection (2).

COUNT 9

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 8 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from EVEREST NATIONAL
INSURANCE COMPANY (ENIC), and the claim and amount at issue exceeded Nine Hundred
Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine
Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

1 It is further alleged that in the commission and attempted commission of the above
2 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
3 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
4 property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
5 Penal Code section 12022.6, subdivision (a), subsection (1).

6 COUNT 10

7 For a further and separate cause of action, being a different offense from but connected
8 in its commission with the charges set forth in counts 1 through 9 hereof, the Criminal Grand
9 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
10 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
11 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
12 through and including July 15, 2014, in the County of Riverside, State of California, the
13 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
14 fraudulent claim for payment of a health care benefit, to wit, from FARMER'S, and the claim
15 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
16 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
17 month consecutive period.

18 It is further alleged that in the commission and attempted commission of the above
19 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
20 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
21 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
22 subdivision (a), subsection (2).

23 COUNT 11

24 For a further and separate cause of action, being a different offense from but connected
25 in its commission with the charges set forth in counts 1 through 10 hereof, the Criminal Grand
26 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
27 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
28 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
29 through and including July 15, 2014, in the County of Riverside, State of California, the
30 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
31 fraudulent claim for payment of a health care benefit, to wit, from FIREMAN'S, and the claim
32 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
33 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
34 month consecutive period.

35 It is further alleged that in the commission and attempted commission of the above
36 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and

1 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
2 property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6,
3 subdivision (a), subsection (1).

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

COUNT 12

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 11 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from HARTFORD, and the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 13

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 12 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from INSURANCE CARRIES OF THE WEST (ICW) and the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,

1 subdivision (a), subsection (2).

2 COUNT 14.

3 For a further and separate cause of action, being a different offense from but connected
4 in its commission with the charges set forth in counts 1 through 13 hereof, the Criminal Grand
5 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
6 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
7 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
8 through and including July 15, 2014, in the County of Riverside, State of California, the
9 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
10 fraudulent claim for payment of a health care benefit, to wit, from LIBERTY MUTUAL, and
11 the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate
12 amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five
13 years and six-month consecutive period.

14 It is further alleged that in the commission and attempted commission of the above
15 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
16 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
17 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
18 subdivision (a), subsection (3).

19 COUNT 15

20 For a further and separate cause of action, being a different offense from but connected
21 in its commission with the charges set forth in counts 1 through 14 hereof, the Criminal Grand
22 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
23 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
24 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
25 through and including July 15, 2014, in the County of Riverside, State of California, the
26 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
27 fraudulent claim for payment of a health care benefit; to wit, from REPUBLIC INDEMNITY,
28 and the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the
29 aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in
30 a five years and six-month consecutive period.

31 It is further alleged that in the commission and attempted commission of the above
32 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
33 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
34 property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
35 Penal Code section 12022.6, subdivision (a), subsection (1).

36 COUNT 16

1 For a further and separate cause of action, being a different offense from but connected
2 in its commission with the charges set forth in counts 1 through 15 hereof, the Criminal Grand
3 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
4 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
5 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
6 through and including July 15, 2014, in the County of Riverside, State of California, the
7 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
8 fraudulent claim for payment of a health care benefit, to wit, from STATE COMPENSATION
9 INSURANCE FUND (SCIF), and the claim and amount at issue exceeded Nine Hundred Fifty
10 dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred
11 Fifty dollars (\$950) in a five years and six-month consecutive period.

12 It is further alleged that in the commission and attempted commission of the above
13 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
14 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
15 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
16 subdivision (a), subsection (3).

17 COUNT 17

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission with the charges set forth in counts 1 through 16 hereof, the Criminal Grand Jury of
20 the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY
21 DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code
22 section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through
23 and including July 15, 2014, in the County of Riverside, State of California, the defendants did
24 willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for
25 payment of a health care benefit, to wit, from TRAVELER'S, and the claim and amount at issue
26 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
27 issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

28 It is further alleged that in the commission and attempted commission of the above
29 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
30 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
31 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
32 subdivision (a), subsection (3).

33 COUNT 18

34 For a further and separate cause of action, being a different offense from but connected
35 in its commission with the charges set forth in counts 1 through 17 hereof, the Criminal Grand
36 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and

1 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
2 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
3 through and including July 15, 2014, in the County of Riverside, State of California, the
4 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
5 fraudulent claim for payment of a health care benefit, to wit, from ZENITH, and the claim and
6 amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
7 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
8 month consecutive period.

9 It is further alleged that in the commission and attempted commission of the above
10 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
11 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
12 property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6,
13 subdivision (a), subsection (1).

14 COUNT 19

15 For a further and separate cause of action, being a different offense from but connected
16 in its commission with the charges set forth in counts 1 through 18 hereof, the Criminal Grand
17 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
18 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
19 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
20 through and including July 15, 2014, in the County of Riverside, State of California, the
21 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
22 fraudulent claim for payment of a health care benefit, to wit, from ZURICH, and the claim and
23 amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
24 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
25 month consecutive period.

26 It is further alleged that in the commission and attempted commission of the above
27 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
28 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
29 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
30 subdivision (a), subsection (3).

31 COUNT 20

32 For a further and separate cause of action, being a different offense from but connected
33 in its commission with the charges set forth in counts 1 through 19 hereof, the Criminal Grand
34 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
35 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
36 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about

1 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
2 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
3 false and fraudulent material statement and material representation, to wit, to ACE, for the
4 purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

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

COUNT 21

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 20 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to AMERICAN
INTERNATIONAL GROUP (AIG) for the purpose of obtaining and denying compensation, as
defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above
offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6,
subdivision (a), subsection (1).

COUNT 22

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 21 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to
BERKSHIRE/HATHAWAY for the purpose of obtaining and denying compensation, as
defined in Labor Code section 3207.

COUNT 23

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 22 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of

1 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
2 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
3 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
4 false and fraudulent material statement and material representation, to wit, to CNA
5 INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
6 Code section 3207.

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

COUNT 24

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 23 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to CALIFORNIA
RESTAURANT MUTUAL BENEFITS CORPORATION (CRMBC) for the purpose of
obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 25

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 24 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to CRUM &
FORESTER for the purpose of obtaining and denying compensation, as defined in Labor Code
section 3207.

It is further alleged that in the commission and attempted commission of the above offense the
said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS
and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value
exceeding \$200,000, within the meaning of Penal Code section 12022.6, subdivision (a),
subsection (2).

COUNT 26

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 25 hereof, the Criminal Grand

1 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
2 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
3 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
4 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
5 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
6 false and fraudulent material statement and material representation, to wit, to EMPLOYERS
7 INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
8 Code section 3207.

9 It is further alleged that in the commission and attempted commission of the above
10 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
11 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
12 property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
13 Penal Code section 12022.6, subdivision (a), subsection (1).

14 COUNT 27

15 For a further and separate cause of action, being a different offense from but connected
16 in its commission with the charges set forth in counts 1 through 26 hereof, the Criminal Grand
17 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
18 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
19 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
20 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
21 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
22 false and fraudulent material statement and material representation, to wit, to EVEREST
23 NATIONAL INSURANCE COMPANY (ENIC), for the purpose of obtaining and denying
24 compensation, as defined in Labor Code section 3207.

25 COUNT 28

26 For a further and separate cause of action, being a different offense from but connected
27 in its commission with the charges set forth in counts 1 through 27 hereof, the Criminal Grand
28 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
29 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
30 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
31 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
32 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
33 false and fraudulent material statement and material representation, to wit, to FARMER'S
34 INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
35 Code section 3207.

36 ///

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

COUNT 29

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 28 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to FIREMAN'S, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 30

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 29 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to HARFORD, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 31

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 30 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about

1 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
2 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
3 false and fraudulent material statement and material representation, to wit, to INSURANCE
4 CARRIERS OF THE WEST (ICW), for the purpose of obtaining and denying compensation, as
5 defined in Labor Code section 3207.

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

COUNT 32

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 31 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to LIBERTY
MUTUAL for the purpose of obtaining and denying compensation, as defined in Labor Code
section 3207.

COUNT 33

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 32 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to REPUBLIC
INDEMNITY for the purpose of obtaining and denying compensation, as defined in Labor
Code section 3207.

COUNT 34

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 33 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to STATE

1 COMPENSATION INSURANCE FUND (SCIF), for the purpose of obtaining and denying
2 compensation, as defined in Labor Code section 3207.

3 It is further alleged that in the commission and attempted commission of the above
4 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
5 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
6 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
7 subdivision (a), subsection (2).

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
COUNT 35

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 34 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to TRAVELERS
INSURANCE, for the purpose of obtaining and denying compensation, as defined in Labor
Code section 3207.

It is further alleged that in the commission and attempted commission of the above
offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 36

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 35 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to ZENITH
INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
Code section 3207.

COUNT 37

For a further and separate cause of action, being a different offense from but connected

1 in its commission with the charges set forth in counts 1 through 36 hereof, the Criminal Grand
2 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
3 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
4 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
5 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
6 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
7 false and fraudulent material statement and material representation, to wit, to ZURICH for the
8 purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

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
COUNT 38

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 37 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
February 25, 2011, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$729.333 WIRE from VION
OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that
the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(B).

COUNT 39

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 38 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
April 7, 2011, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding

1 twenty-five thousand dollars (\$25,000.00), to wit, a \$263, 651.22 WIRE from VION
2 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
3 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
4 promotion, management, establishment, or carrying on of any criminal activity; or knowing that
5 the monetary instrument is derived directly or indirectly from criminal activity.

6 It is further alleged that in the commission and attempted commission of the above
7 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
8 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
9 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
10 subsection (1)(B).

11 COUNT 40

12 For a further and separate cause of action, being a different offense from but connected
13 in its commission with the charges set forth in counts 1 through 39 hereof, the Criminal Grand
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
15 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
16 May 20, 2011, in the County of Riverside, State of California, the defendant did willfully,
17 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
18 period, involving monetary instruments of a total value exceeding five thousand dollars
19 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
20 twenty-five thousand dollars (\$25,000.00), to wit, a \$173,113.78 WIRE from VION
21 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
22 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
23 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
24 the monetary instrument is derived directly or indirectly from criminal activity.

25 It is further alleged that in the commission and attempted commission of the above
26 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
27 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
28 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
29 subsection (1)(B).

30 COUNT 41

31 For a further and separate cause of action, being a different offense from but connected
32 in its commission with the charges set forth in counts 1 through 40 hereof, the Criminal Grand
33 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
34 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
35 June 24, 2011, in the County of Riverside, State of California, the defendant did willfully,
36 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day

1 period, involving monetary instruments of a total value exceeding five thousand dollars
2 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
3 twenty-five thousand dollars (\$25,000.00), to wit, a \$143,353.87 WIRE from VION
4 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
5 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
6 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
7 the monetary instrument is derived directly or indirectly from criminal activity.

8 It is further alleged that in the commission and attempted commission of the above
9 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
10 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
11 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
12 subsection (1)(A).

13 COUNT 42

14 For a further and separate cause of action, being a different offense from but connected
15 in its commission with the charges set forth in counts 1 through 41 hereof, the Criminal Grand
16 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
17 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about July 22,
18 2011, in the County of Riverside, State of California, the defendant did willfully, knowingly
19 and unlawfully conduct a transaction, and more than one transaction in a seven day period,
20 involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00),
21 and more than one transaction involving monetary instruments of a total exceeding twenty-five
22 thousand dollars (\$25,000.00), to wit, a \$93,343.88 WIRE from VION OPERATIONS LLC to
23 BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB
24 Account with the specific intent to promote or facilitate the promotion, management,
25 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument
26 is derived directly or indirectly from criminal activity.

27 It is further alleged that in the commission and attempted commission of the above
28 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
29 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
30 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
31 subsection (1)(A).

32 COUNT 43

33 For a further and separate cause of action, being a different offense from but connected
34 in its commission with the charges set forth in counts 1 through 42 hereof, the Criminal Grand
35 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
36 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about

1 August 25, 2011, in the County of Riverside, State of California, the defendant did willfully,
2 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
3 period, involving monetary instruments of a total value exceeding five thousand dollars
4 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
5 twenty-five thousand dollars (\$25,000.00), to wit, a \$200,870.01 WIRE from VION
6 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
7 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
8 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
9 the monetary instrument is derived directly or indirectly from criminal activity.

10 It is further alleged that in the commission and attempted commission of the above
11 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
12 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
13 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
14 subsection (1)(B).

15 COUNT 44

16 For a further and separate cause of action, being a different offense from but
17 connected in its commission with the charges set forth in counts 1 through 43 hereof, the
18 Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN
19 HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or
20 about September 23, 2011, in the County of Riverside, State of California, the defendant did
21 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
22 seven-day period, involving monetary instruments of a total value exceeding five thousand
23 dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total
24 exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$204,452.35 WIRE from VION
25 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
26 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
27 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
28 the monetary instrument is derived directly or indirectly from criminal activity.

29 It is further alleged that in the commission and attempted commission of the above
30 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
31 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
32 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
33 subsection (1)(B).

34 COUNT 45

35 For a further and separate cause of action, being a different offense from but connected
36 in its commission with the charges set forth in counts 1 through 44 hereof, the Criminal Grand

1 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
2 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
3 October 26, 2011, in the County of Riverside, State of California, the defendant did willfully,
4 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
5 period, involving monetary instruments of a total value exceeding five thousand dollars
6 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
7 twenty-five thousand dollars (\$25,000.00), to wit, a \$201,494.74 WIRE from VION
8 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
9 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
10 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
11 the monetary instrument is derived directly or indirectly from criminal activity.

12 It is further alleged that in the commission and attempted commission of the above
13 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
14 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
15 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
16 subsection (1)(B).

17 COUNT 46

18 For a further and separate cause of action, being a different offense from but connected in its
19 commission with the charges set forth in counts 1 through 45 hereof, the Criminal Grand Jury
20 of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
21 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
22 November 23, 2011, in the County of Riverside, State of California, the defendant did willfully,
23 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
24 period, involving monetary instruments of a total value exceeding five thousand dollars
25 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
26 twenty-five thousand dollars (\$25,000.00), to wit, a \$165,673.92 WIRE from VION
27 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
28 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
29 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
30 the monetary instrument is derived directly or indirectly from criminal activity.

31 It is further alleged that in the commission and attempted commission of the above
32 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
33 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
34 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
35 subsection (1)(B).

36 ///

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

COUNT 47

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 46 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about December 22, 2011, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$325,315.31 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c), subsection (1)(B).

COUNT 48

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 47 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about January 24, 2012, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$288,369.74 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million

1 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
2 subsection (1)(B).

3
4 COUNT 49

5 For a further and separate cause of action, being a different offense from but connected
6 in its commission with the charges set forth in counts 1 through 48 hereof, the Criminal Grand
7 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
8 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
9 February 24, 2012, in the County of Riverside, State of California, the defendant did willfully,
10 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
11 period, involving monetary instruments of a total value exceeding five thousand dollars
12 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
13 twenty-five thousand dollars (\$25,000.00), to wit, a \$233,071.99 WIRE from CAREPOINT
14 FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
15 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
16 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
17 the monetary instrument is derived directly or indirectly from criminal activity.

18 It is further alleged that in the commission and attempted commission of the above
19 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
20 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
21 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
22 subsection (1)(B).

23
24 COUNT 50

25 For a further and separate cause of action, being a different offense from but connected
26 in its commission with the charges set forth in counts 1 through 49 hereof, the Criminal Grand
27 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
28 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
29 March 26, 2012, in the County of Riverside, State of California, the defendant did willfully,
30 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
31 period, involving monetary instruments of a total value exceeding five thousand dollars
32 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
33 twenty-five thousand dollars (\$25,000.00), to wit, a \$291,621.54 WIRE from CAREPOINT
34 FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
35 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
36 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above

1 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
2 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
3 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
4 subsection (1)(B).

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

COUNT 51

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 50 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
April 20, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$369,637.05 WIRE from CAREPOINT
FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that
the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(B).

COUNT 52

For a further and separate cause of action, being a different offense from but
connected in its commission with the charges set forth in counts 1 through 51 hereof, the
Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN
HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or
about September 14, 2012, in the County of Riverside, State of California, the defendant did
willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
seven day period, involving monetary instruments of a total value exceeding five thousand
dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total
exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$93,273.05 WIRE from JAVLIN
ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the

1 monetary instrument is derived directly or indirectly from criminal activity.

2 It is further alleged that in the commission and attempted commission of the above
3 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
4 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
5 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
6 subsection (1)(A).

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
COUNT 53

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 52 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
October 9, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$97,075.74 WIRE from JAVLIN ONE
LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(A).

COUNT 54

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 53 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
November 9, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$178,684.31 WIRE from JAVLIN ONE
LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL

1 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
2 management, establishment, or carrying on of any criminal activity, or knowing that the
3 monetary instrument is derived directly or indirectly from criminal activity.

4 It is further alleged that in the commission and attempted commission of the above
5 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
6 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
7 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
8 subsection (1)(B).

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
COUNT 55

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 54 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
December 14, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$129,277.35 WIRE from CAREPOINT
ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(A).

COUNT 56

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 55 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
December 28, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding

1 twenty-five thousand dollars (\$25,000.00), to wit, a \$83,770.99 WIRE from CAREPOINT
2 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
3 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
4 management, establishment, or carrying on of any criminal activity, or knowing that the
5 monetary instrument is derived directly or indirectly from criminal activity.

6 It is further alleged that in the commission and attempted commission of the above
7 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
8 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
9 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
10 subsection (1)(A).

11 **COUNT 57**

12 For a further and separate cause of action, being a different offense from but connected
13 in its commission with the charges set forth in counts 1 through 56 hereof, the Criminal Grand
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
15 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
16 January 10, 2013, in the County of Riverside, State of California, the defendant did willfully,
17 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
18 period, involving monetary instruments of a total value exceeding five thousand dollars
19 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
20 twenty-five thousand dollars (\$25,000.00), to wit, a \$58, 584.06 WIRE from CAREPOINT
21 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
22 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
23 management, establishment, or carrying on of any criminal activity, or knowing that the
24 monetary instrument is derived directly or indirectly from criminal activity.

25 It is further alleged that in the commission and attempted commission of the above
26 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
27 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
28 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
29 subsection (1)(A).

30 **COUNT 58**

31 For a further and separate cause of action, being a different offense from but connected
32 in its commission with the charges set forth in counts 1 through 57 hereof, the Criminal Grand
33 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
34 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
35 January 25, 2013, in the County of Riverside, State of California, the defendant did willfully,
36 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day

1 period, involving monetary instruments of a total value exceeding five thousand dollars
2 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
3 twenty-five thousand dollars (\$25,000.00), to wit, a \$45,007.01 WIRE from CAREPOINT
4 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
5 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
6 management, establishment, or carrying on of any criminal activity, or knowing that the
7 monetary instrument is derived directly or indirectly from criminal activity.

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
COUNT 59

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 58 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
February 8, 2013, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$71,401.00 WIRE from CAREPOINT
ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(A).

COUNT 60

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 59 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
February 22, 2013, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$140,543.25 WIRE from CAREPOINT