

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

**ELECTRONICALLY FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE

04/06/2017  
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court  
**17CF0867**

6 THE PEOPLE OF THE STATE OF CALIFORNIA, ) FELONY COMPLAINT  
7 )  
8 Plaintiff, )  
9 )  
10 vs. ) No.  
11 CHRISTOPHER KING 11/29/78 ) OCDA WC16070011  
12 F3474528 ) OCDA WC15040015  
13 AKA CHRISTOPHER RODGER KING ) OCDA HF12110001  
14 CHRISTOPHER RODGER RINGWALT )  
Defendant(s))

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

17 COUNT 1: On or about and between February 01, 2011 and  
18 September 01, 2015, in violation of Section 550(a)(6) of the  
19 Penal Code (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a  
20 FELONY, CHRISTOPHER KING did unlawfully conspire with TANYA  
21 MORELAND KING AND OTHER UNKNOWN INDIVIDUALS, with the intent to  
22 defraud, to make a false and fraudulent claim to WORKERS  
23 COMPENSATION INSURANCE CARRIERS IN CALIFORNIA for payment of a  
24 health care benefit in an amount exceeding nine hundred fifty  
25 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:

26 OVERT ACT 1

27 In 2011, Defendant Christopher King formed a business  
28 partnership with 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 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

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.

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OVERT ACT 13

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 14

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 15

Defendant Tanya King made 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 16

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.

OVERT ACT 17

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.

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OVERT ACT 18

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 19

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 20

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 21

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 22

Between 8/12/12 and 1/15/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Christopher Chen, M.D. 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.

OVERT ACT 23

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.

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OVERT ACT 24

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 25

Between 5/6/14 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Dr. Eduardo Lin, 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 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.

OVERT ACT 27

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 28

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.

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OVERT ACT 29

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 30

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.

OVERT ACT 31

Between 8/14/12 and 8/12/15, Defendant Christopher King and Tanya Moreland King, paid Stanislaus Orthopaedic 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 32

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.

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1 COUNT 2: On or about and between April 04, 2013 and September  
2 04, 2015, in violation of Section 550(b)(3) of the Penal Code  
3 (INSURANCE FRAUD), a FELONY, CHRISTOPHER KING, with the intent  
4 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, AIG, Allianz Global  
9 Corporate & Specialty, Berkshire Hathaway, California Insurance  
10 Company (Applied Underwriters), Crum & Forster, Disneyland,  
11 Employers Insurance, Farmers Insurance, ICW Group Insurance Co.,  
12 LA City, LA County, Liberty Mutual Insurance, Los Angeles  
13 Department of Water & Power, Markel Corp (First Comp), Pacific  
14 Compensation Insurance Co., Probe, Republic Indemnity Company of  
15 America, State Compensation Insurance Fund, The Hartford  
16 Financial Services, Total Health & Productivity Management,  
17 Travelers, Tristar Insurance Group, York Risk Service Group,  
18 Zenith Insurance, Zurich North America to an insurance benefit  
19 and payment, and to the amount of a benefit and payment to which  
20 Accident Fund Group, AIG, Allianz Global Corporate & Specialty,  
21 Berkshire Hathaway, California Insurance Company (Applied  
Underwriters), Crum & Forster, Disneyland, Employers Insurance,  
Farmers Insurance, ICW Group Insurance Co., LA City, LA County,  
Liberty Mutual Insurance, Los Angeles Department of Water &  
Power, Markel Corp (First Comp), Pacific Compensation Insurance  
Co., Probe, Republic Indemnity Company of America, State  
Compensation Insurance Fund, The Hartford Financial Services,  
Total Health & Productivity Management, Travelers, Tristar  
Insurance Group, York Risk Service Group, Zenith Insurance,  
Zurich North America was entitled, namely: PAID KICKBACKS TO  
PHYSICIANS TO PROCURE PRESCRIPTIONS AND URINE TOXICOLOGY ORDERS.

22 ENHANCEMENT(S)

23 As to Count(s) 1 and 2, it is further alleged pursuant to Penal  
24 Code section 12022.6(a)(4) (PROPERTY DAMAGE OVER \$3,200,000),  
25 that CHRISTOPHER KING intentionally took, damaged, and  
26 destroyed property valued in excess of three million two hundred  
27 thousand dollars (\$3,200,000) during the commission and  
attempted commission of the above offense.

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1 It is further alleged pursuant to Penal Code section 186.11(a)  
2 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as  
3 to counts 1 and 2, defendant CHRISTOPHER KING engaged in a  
4 pattern of related fraudulent felony conduct involving the  
taking of more than five hundred thousand dollars (\$500,000).

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

7 Dated 04-05-2017 at Orange County, California.  
8 KS/AC 17F00372

9  
10 TONY RACKAUCKAS, DISTRICT ATTORNEY

11 by: /s/ SHADDI KAMIABIPOUR  
12 SHADDI KAMIABIPOUR, Deputy District Attorney

13 RESTITUTION CLAIMED

14 [ ] None  
15 [ ] \$ \_\_\_\_\_  
16 [ X ] To be determined

17 NOTICES:

18 The People request that defendant and counsel disclose, within  
19 15 days, all of the materials and information described in Penal  
20 Code section 1054.3, and continue to provide any later-acquired  
21 materials and information subject to disclosure, and without  
further request or order.

22  
23 Pursuant to Welfare & Institutions Code §827 and California Rule  
24 of Court 5.552, notice is hereby given that the People will seek  
25 a court order to disseminate the juvenile case file of the  
26 defendant/minor, if any exists, to all parties in this action,  
through their respective attorneys of record, in the prosecution  
of this case.

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