

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

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

04/03/2017
09:11 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF0816

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 JONATHAN LOUIS COHEN 06/10/59) OCDA WC16070011
12 A8409917)
13 JOHN JOSEPH CASEY JR 08/31/51)
14 S0586107)
15 AKA JOHN JOSEPH CASEY)
16 JOHN J CASEY)
17 MOHAMED ADLY IBRAHIM 10/25/76)
18 B8127049)
19 AKA MOHAMED IBRAHIM)
20 WILLIAM LOUIS PISTEL 10/05/63)
21 D2574900)
22 AKA WILLIAM PISTEL)
23)
24 Defendant(s))

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

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1 COUNT 1: On or about and between August 12, 2012 and August 12,
2 2015, in violation of Section 550(a)(6) of the Penal Code
3 (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY,
4 JONATHAN LOUIS COHEN, JOHN JOSEPH CASEY JR, MOHAMED ADLY IBRAHIM
5 and WILLIAM LOUIS PISTEL did unlawfully conspire with Conspired
6 with Tanya Moreland King and Christopher King and other Unknown
7 individuals., with the intent to defraud, to make a false and
8 fraudulent claim to Workers compensation Insurance Carriers in
9 California for payment of a health care benefit in an amount
exceeding nine hundred fifty dollars (\$950). It is further
alleged that pursuant to and for the purpose of carrying out the
objects and purposes of the conspiracy, one and more of the
conspirators committed the following overt acts:

10 OVERT ACT 1

11 On or about August 14, 2012, Defendants John Casey M.D.,
12 Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D.
13 and their clinic, Stanislaus Orthopedic and Sports Medicine
14 Clinic, entered into an agreement with Tanya Moreland King,
15 Christopher King and their Companies King Medical Management
Inc., and Monarch Medical Group Inc.

16 OVERT ACT 2

17 King Medical Management formulated and paid for a 3-day supply
18 of the compound transdermal creams manufactured by Steven's
19 Pharmacy, located in Costa Mesa, in the County of Orange, and
20 arranged for Steven's Pharmacy to ship these creams to
21 Defendants John Casey M.D., Jonathan Cohen, M.D. William,
22 Pistel, D.O., Ibrahim Mohamed M.D. at their clinic, Stanislaus
Orthopedic and Sports Medicine Clinic

23 OVERT ACT 3

24 Defendants John Casey M.D., Jonathan Cohen, M.D. William,
25 Pistel, D.O., Ibrahim Mohamed M.D., prescribed the transdermal
26 compound creams manufactured by Steven's Pharmacy to his workers
compensation patients.

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OVERT ACT 4

Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. did not customize these compound transdermal creams to each workers compensation patient and used the formula given to him by Monarch Medical Group.

OVERT ACT 5

Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D., then provided the billing information for each workers compensation patient to King Medical Management Inc. to bill for the dispensing of these creams from their clinic.

OVERT ACT 6

King Medical Management Inc. billed workers compensation carriers in excess of \$200 per cream even though the cream only cost \$15.

OVERT ACT 7

King Medical Management Inc., gave Stanislaus Ortho & Sports Medicine Clinic, \$100 or 95% of the profits from the amount collected from the workers compensation carrier for the 3-day supply.

OVERT ACT 8

In return for the money they received from the billing on the 3-day supply of the transdermal creams, Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. were also required to write a prescription for the 30-day supply of transdermal compound creams which was shipped to their workers' compensation patients by Steven's Pharmacy in Costa Mesa, located in the County of Orange.

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OVERT ACT 9

In order to give the appearance of legitimacy of the compounded transdermal creams that Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. prescribed to their patients, on 2/19/15, each signed a letter that Monarch Medical Group provided to him, purporting to give instructions to the pharmacy and customize the formula for the compound creams.

OVERT ACT 10

Monarch Medical Group then billed the workers compensation insurance carriers well in excess of \$700 for each compounded transdermal cream that was shipped by Steven's Pharmacy, located in Costa Mesa, to each of Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. patients, and cost Monarch Medical Management only \$60 per compound cream to manufacture.

OVERT ACT 11

Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. also entered into an agreement with Monarch Medical Group and One Source Labs Inc., in which he agreed to prescribe Urine toxicology Drug testing to their workers compensation patients in return for financial consideration.

OVERT ACT 12

Monarch Medical Group purchased Active Medicated Specimen collection kits from NuCare Pharmaceuticals Inc., located in the City of Orange, County of Orange and shipped the kits to Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. at their Clinic, Stanislaus Ortho and Sports Medicine Clinic.

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OVERT ACT 13

Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D., subjected their patients to a Urine Toxicology Test at their clinic, and regardless of the "Point of Care" toxicology test results, referred the test for a qualitative test to One Source Labs per their agreement with Monarch Medical Group.

OVERT ACT 14

Monarch Medical Group then billed workers compensation insurance carriers for the "Point of Care" toxicology test that was performed at the clinic, and gave 80% of the profit on the amounts collected to Stanislaus Ortho & Sports Medicine Clinic.

OVERT ACT 15

In return for the payment on the "Point of Care" toxicology tests, Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. then permitted One Source Labs to do quantitative tests on all Urine samples submitted by the workers compensation patients, regardless of medical necessity or test results.

OVERT ACT 16

One Source Labs then billed workers compensation carriers in excess of \$700 for these quantitative tests.

OVERT ACT 17

Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. also entered into an agreement with Monarch Medical Group to distribute the oral medications that Monarch purchased from Nucare Pharmaceuticals located in the City of Orange, County of Orange.

OVERT ACT 18

Between 10/8/12 and 3/10/15, Monarch Medical Group paid Stanislaus Ortho and Sports Medicine Clinic, 80% of the profits on the net amounts collected from workers compensation carriers for distribution of the oral medications purchased by NuCare.

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OVERT ACT 19

On 3/10/15, Defendants John Casey M.D., Jonathan Cohen, M.D. William, Pistel, D.O., Ibrahim Mohamed M.D. also entered into an agreement with Monarch Medical Group to distribute the oral medications that Monarch purchased from A S Medication Solutions located in County of Orange.

OVERT ACT 20

Between 3/10/15 and 8/12/15, Monarch Medical Group paid Stanislaus Ortho and Sports Medicine Clinic, 80% of the profits on the net amounts collected from workers compensation carriers for distribution of the oral medications purchased by A S Medication Solutions located in the County of Orange.

OVERT ACT 21

Between 8/14/12 and 8/12/15, Monarch Medical Group and King Medical Management, paid Stanislaus Orthopedic and Sports Medicine Clinic in excess of \$248,000, and at least one check was issued on 8/12/15 in the amount of \$4714.98 and on check # 6910.

COUNT 2: On or about and between April 04, 2014 and August 12, 2015, in violation of Section 549 of the Penal Code (FALSE AND FRAUDULENT CLAIM), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL did unlawfully solicit, accept, and refer business to and from King Medical Management Inc. and One Source Labs Inc., with the knowledge that, and with reckless disregard for whether King Medical Management Inc. and One Source Labs Inc. intended to violate Penal Code section 550 and Insurance Code section 1871.4. (Urine Toxicology)

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1 COUNT 3: On or about and between April 15, 2014 and January 15,
2 2015, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
4 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL did
5 unlawfully solicit, accept, and refer business to and from King
6 Medical Management Inc. and Monarch Medical Group Inc., with the
7 knowledge that, and with reckless disregard for whether King
8 Medical Management Inc. and Monarch Medical Group Inc. intended
9 to violate Penal Code section 550 and Insurance Code section
10 1871.4. (Compound Transdermal Creams from Steven's Pharmacy)

8 COUNT 4: On or about and between April 04, 2014 and August 12,
9 2015, in violation of Section 650 of the Business & Professions
10 Code (REBATES FOR PATIENT REFERRALS), a FELONY, JONATHAN LOUIS
11 COHEN, JOHN JOSEPH CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM
12 LOUIS PISTEL, a person licensed under the Healing Arts Division
13 of this Code and the Chiropractic Initiative Act, did unlawfully
14 offer, deliver, receive, and accept any rebate, refund,
15 commission, preference, patronage dividend, discount, and other
16 consideration as compensation and inducement for referring
17 patients, clients, and customers to Tanya Moreland King and her
18 Business One Source Labs and King Medical Management Inc.

16 COUNT 5: On or about and between April 04, 2014 and August 12,
17 2015, in violation of Section 650 of the Business & Professions
18 Code (REBATES FOR PATIENT REFERRALS), a FELONY, JONATHAN LOUIS
19 COHEN, JOHN JOSEPH CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM
20 LOUIS PISTEL, a person licensed under the Healing Arts Division
21 of this Code and the Chiropractic Initiative Act, did unlawfully
22 offer, deliver, receive, and accept any rebate, refund,
23 commission, preference, patronage dividend, discount, and other
24 consideration as compensation and inducement for referring
25 patients, clients, and customers to Tanya Moreland King and her
26 Business Monarch Medical Group.

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1 COUNT 6: On or about and between April 14, 2014 and August 12,
2 2015, in violation of Section 650 of the Business & Professions
3 Code (REBATES FOR PATIENT REFERRALS), a FELONY, JONATHAN LOUIS
4 COHEN, JOHN JOSEPH CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM
5 LOUIS PISTEL, a person licensed under the Healing Arts Division
6 of this Code and the Chiropractic Initiative Act, did unlawfully
7 offer, deliver, receive, and accept any rebate, refund,
8 commission, preference, patronage dividend, discount, and other
consideration as compensation and inducement for referring
patients, clients, and customers to Steven's Pharmacy and Tanya
Moreland King and her Business Monarch Medical Group Inc.

9 COUNT 7: On or about and between January 15, 2015 and August
10 12, 2015, in violation of Section 650 of the Business &
11 Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY,
12 JONATHAN LOUIS COHEN, JOHN JOSEPH CASEY JR, MOHAMED ADLY IBRAHIM
13 and WILLIAM LOUIS PISTEL, a person licensed under the Healing
14 Arts Division of this Code and the Chiropractic Initiative Act,
15 did unlawfully offer, deliver, receive, and accept any rebate,
16 refund, commission, preference, patronage dividend, discount,
and other consideration as compensation and inducement for
referring patients, clients, and customers to Steven's Pharmacy
and Tanya Moreland King and her Business Monarch Medical Group
Inc.

17 COUNT 8: On or about and between April 04, 2013 and August 26,
18 2013, in violation of Section 550(b)(3) of the Penal Code
19 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
20 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
21 the intent to defraud, did unlawfully conceal and knowingly
22 fail to disclose, and did knowingly assist with another person
23 to conceal and fail to disclose the occurrence of an event and a
24 fact that affected the initial and continued material right and
25 entitlement of Allianz to an insurance benefit and payment, and
26 to the amount of a benefit and payment to which Allianz was
entitled, namely: Defendant had a financial interest in and
received financial incentives to prescribe oral medications,
Compound Creams and Urine Toxicology Tests to his workers
compensation patients.

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1 COUNT 9: On or about and between April 04, 2013 and June 04,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
4 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
5 the intent to defraud, did unlawfully conceal and knowingly
6 fail to disclose, and did knowingly assist with another person
7 to conceal and fail to disclose the occurrence of an event and a
8 fact that affected the initial and continued material right and
9 entitlement of AIG to an insurance benefit and payment, and to
10 the amount of a benefit and payment to which AIG was entitled,
11 namely: Defendant had a financial interest in and received
12 financial incentives to prescribe oral medications, Compound
13 Creams and Urine Toxicology Tests to his workers compensation
14 patients.

15 COUNT 10: On or about and between April 04, 2013 and September
16 22, 2015, in violation of Section 550(b)(3) of the Penal Code
17 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
18 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
19 the intent to defraud, did unlawfully conceal and knowingly
20 fail to disclose, and did knowingly assist with another person
21 to conceal and fail to disclose the occurrence of an event and a
22 fact that affected the initial and continued material right and
23 entitlement of California Insurance Co. Applied Underwriters to
24 an insurance benefit and payment, and to the amount of a benefit
25 and payment to which California Insurance Co. Applied
26 Underwriters was entitled, namely: Defendant had a financial
27 interest in and received financial incentives to prescribe oral
28 medications, Compound Creams and Urine Toxicology Tests to his
workers compensation patients.

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1 COUNT 11: On or about and between April 15, 2014 and January
2 15, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
4 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
5 the intent to defraud, did unlawfully conceal and knowingly
6 fail to disclose, and did knowingly assist with another person
7 to conceal and fail to disclose the occurrence of an event and a
8 fact that affected the initial and continued material right and
9 entitlement of Berkshire Hathaway Homestead Companies to an
10 insurance benefit and payment, and to the amount of a benefit
11 and payment to which Berkshire Hathaway Homestead Companies was
12 entitled, namely: Defendant had a financial interest in and
13 received financial incentives to prescribe Compound Creams and
14 Urine Toxicology Tests to his workers compensation patients.

11 COUNT 12: On or about and between April 04, 2013 and May 28,
12 2014, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
14 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
15 the intent to defraud, did unlawfully conceal and knowingly
16 fail to disclose, and did knowingly assist with another person
17 to conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of Employers to an insurance benefit and payment,
20 and to the amount of a benefit and payment to which Employers
21 was entitled, namely: Defendant had a financial interest in and
22 received financial incentives to prescribe oral medications,
23 Compound Creams and Urine Toxicology Tests to his workers
24 compensation patients.

21 COUNT 13: On or about and between April 04, 2013 and January
22 21, 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
24 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
25 the intent to defraud, did unlawfully conceal and knowingly
26 fail to disclose, and did knowingly assist with another person
27 to conceal and fail to disclose the occurrence of an event and a
28 fact that affected the initial and continued material right and
entitlement of Farmers Insurance to an insurance benefit and
payment, and to the amount of a benefit and payment to which
Farmers Insurance was entitled, namely: Defendant had a
financial interest in and received financial incentives to
prescribe Compound Creams and Urine Toxicology Tests to his
workers compensation patients.

1 COUNT 14: On or about and between April 04, 2013 and September
2 16, 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
4 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
5 the intent to defraud, did unlawfully conceal and knowingly
6 fail to disclose, and did knowingly assist with another person
7 to conceal and fail to disclose the occurrence of an event and a
8 fact that affected the initial and continued material right and
9 entitlement of ICW to an insurance benefit and payment, and to
10 the amount of a benefit and payment to which ICW was entitled,
11 namely: Defendant had a financial interest in and received
12 financial incentives to prescribe Compound Creams and oral
13 medication and to order Urine Toxicology Tests to his workers
14 compensation patients.

11 COUNT 15: On or about and between April 04, 2013 and August 24,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
14 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
15 the intent to defraud, did unlawfully conceal and knowingly
16 fail to disclose, and did knowingly assist with another person
17 to conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of Liberty Mutual Insurance to an insurance benefit
20 and payment, and to the amount of a benefit and payment to which
21 Liberty Mutual Insurance was entitled, namely: Defendant had a
22 financial interest in and received financial incentives to
23 prescribe compound creams and oral medications and to order
24 Urine Toxicology Tests to his workers compensation patients.

21 COUNT 16: On or about and between April 04, 2013 and May 04,
22 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
24 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
25 the intent to defraud, did unlawfully conceal and knowingly
26 fail to disclose, and did knowingly assist with another person
27 to conceal and fail to disclose the occurrence of an event and a
28 fact that affected the initial and continued material right and
entitlement of Markel (First Comp) to an insurance benefit and
payment, and to the amount of a benefit and payment to which
Markel (First Comp) was entitled, namely: Defendant had a
financial interest in and received financial incentives to order
Urine Toxicology Tests and prescribe Compound Creams and oral
medications to his workers compensation patients.

1 COUNT 17: On or about and between April 04, 2013 and August 24,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
4 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
5 the intent to defraud, did unlawfully conceal and knowingly
6 fail to disclose, and did knowingly assist with another person
7 to conceal and fail to disclose the occurrence of an event and a
8 fact that affected the initial and continued material right and
9 entitlement of STATE COMPENSATION INSURANCE FUND to an insurance
10 benefit and payment, and to the amount of a benefit and payment
11 to which STATE COMPENSATION INSURANCE FUND was entitled, namely:
12 Defendant had a financial interest in and received financial
13 incentives to prescribe oral medications, Compound Creams and
14 Urine Toxicology Tests to his workers compensation patients.

11 COUNT 18: On or about and between April 04, 2013 and September
12 10, 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
14 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
15 the intent to defraud, did unlawfully conceal and knowingly
16 fail to disclose, and did knowingly assist with another person
17 to conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of THE HARTFORD to an insurance benefit and payment,
20 and to the amount of a benefit and payment to which THE HARTFORD
21 was entitled, namely: Defendant had a financial interest in and
22 received financial incentives to order Urine Toxicology Tests
23 and prescribe Compound Creams and oral medications to his
24 workers compensation patients.

21 COUNT 19: On or about and between April 04, 2013 and July 25,
22 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
24 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
25 the intent to defraud, did unlawfully conceal and knowingly
26 fail to disclose, and did knowingly assist with another person
27 to conceal and fail to disclose the occurrence of an event and a
28 fact that affected the initial and continued material right and
entitlement of TRAVELERS INSURANCE to an insurance benefit and
payment, and to the amount of a benefit and payment to which
TRAVELERS INSURANCE was entitled, namely: Defendant had a
financial interest in and received financial incentives to order
Urine Toxicology Tests and prescribe Compound Creams and oral
medications to his workers compensation patients.

1 COUNT 20: On or about and between April 04, 2013 and August 24,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
4 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
5 the intent to defraud, did unlawfully conceal and knowingly
6 fail to disclose, and did knowingly assist with another person
7 to conceal and fail to disclose the occurrence of an event and a
8 fact that affected the initial and continued material right and
9 entitlement of TRISTAR INSURANCE GROUP to an insurance benefit
10 and payment, and to the amount of a benefit and payment to which
11 TRISTAR INSURANCE GROUP was entitled, namely: Defendant had a
12 financial interest in and received financial incentives to order
13 Urine Toxicology Tests and prescribe Compound Creams and oral
14 medications to his workers compensation patients.

11 COUNT 21: On or about and between April 04, 2013 and April 16,
12 2015, in violation of Section 550(b)(3) of the Penal Code
13 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
14 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
15 the intent to defraud, did unlawfully conceal and knowingly
16 fail to disclose, and did knowingly assist with another person
17 to conceal and fail to disclose the occurrence of an event and a
18 fact that affected the initial and continued material right and
19 entitlement of YORK RISK SERVICE GROUP to an insurance benefit
20 and payment, and to the amount of a benefit and payment to which
21 YORK RISK SERVICE GROUP was entitled, namely: Defendant had a
22 financial interest in and received financial incentives to order
23 Urine Toxicology Tests and prescribe Compound Creams and oral
24 medications to his workers compensation patients.

21 COUNT 22: On or about and between April 04, 2013 and August 24,
22 2015, in violation of Section 550(b)(3) of the Penal Code
23 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
24 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
25 the intent to defraud, did unlawfully conceal and knowingly
26 fail to disclose, and did knowingly assist with another person
27 to conceal and fail to disclose the occurrence of an event and a
28 fact that affected the initial and continued material right and
entitlement of ZURICH NORTH AMERICA to an insurance benefit and
payment, and to the amount of a benefit and payment to which
ZURICH NORTH AMERICA was entitled, namely: Defendant had a
financial interest in and received financial incentives to order
Urine Toxicology Tests and prescribe Compound Creams and oral
medications to his workers compensation patients.

1 COUNT 23: On or about and between April 03, 2013 and August 04,
2 2016, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, JONATHAN LOUIS COHEN, JOHN JOSEPH
4 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL, with
5 the intent to defraud, did unlawfully conceal and knowingly
6 fail to disclose, and did knowingly assist with another person
7 to conceal and fail to disclose the occurrence of an event and a
8 fact that affected the initial and continued material right and
9 entitlement of ZENITH to an insurance benefit and payment, and
10 to the amount of a benefit and payment to which ZENITH was
11 entitled, namely: Defendant had a financial interest in and
12 received financial incentives to order Urine Toxicology Tests
13 and prescribe Compound Creams and oral medications to his
14 workers' compensation patients.

11 ENHANCEMENT(S)

12 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,
13 15, 16, 17, 18, 19, 20, 21, 22 and 23, it is further alleged
14 pursuant to Penal Code section 12022.6(a)(2) (PROPERTY LOSS OVER
15 \$200,000), that JONATHAN LOUIS COHEN, JOHN JOSEPH CASEY JR,
16 MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL intentionally
17 took, damaged, and destroyed property valued in excess of two
18 hundred thousand dollars (\$200,000) during the commission and
19 attempted commission of the above offense.

18 It is further alleged pursuant to Penal Code section 186.11(a)
19 (1)/(3) (AGGRAVATED WHITE COLLAR CRIME - OVER \$100,000), that as
20 to counts 1, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20,
21 21, 22 and 23, defendants JONATHAN LOUIS COHEN, JOHN JOSEPH
22 CASEY JR, MOHAMED ADLY IBRAHIM and WILLIAM LOUIS PISTEL engaged
23 in a pattern of related fraudulent felony conduct involving the
24 taking of more than one hundred thousand dollars (\$100,000) but
25 less than five hundred thousand dollars (\$500,000).

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

3 Dated 04-03-2017 at Orange County, California.
4 KS/MO 17F00371

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6 TONY RACKAUCKAS, DISTRICT ATTORNEY

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8 by: /s/ SHADDI KAMIABIPOUR
SHADDI KAMIABIPOUR, Deputy District Attorney

9 RESTITUTION CLAIMED

10
11 [] None
12 [] \$ _____
13 [X] To be determined

14 BAIL RECOMMENDATION:

15 JONATHAN LOUIS COHEN - \$ 200,000.00
16 JOHN JOSEPH CASEY JR - \$ 200,000.00
17 MOHAMED ADLY IBRAHIM - \$ 200,000.00
WILLIAM LOUIS PISTEL - \$ 200,000.00

18 NOTICES:

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

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

28