

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SECRET

The People of the State of California,
Plaintiff,

CASE NO. BA435339

v.

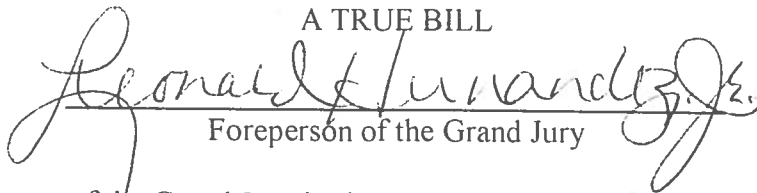
INDICTMENT

1. TATIANA TORRES ARNOLD
2. TERRY LUKE
3. TONY FOLGAR
4. YOLANDA GROSCOST

COUNT 1

The said TATIANA TORRES ARNOLD, TERRY LUKE, TONY FOLGAR and YOLANDA GROSCOST are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

A TRUE BILL


Foreperson of the Grand Jury

Presented by the Foreperson of the Grand Jury in the presence of the Grand Jury, in open Superior Court of the State of California, within and for the County of Los Angeles, and filed as a record in said Court this 26th day of August, 2015

SHERRI R. CARTER, Executive Officer/Clerk

By _____ Deputy

JACKIE LACEY, District Attorney

By  Deputy

On and between November 15, 2004 and August 21, 2015, in the County of Los Angeles, the said **TATIANA TORRES ARNOLD, TERRY LUKE, TONY FOLGAR and YOLANDA GROSCOST** did unlawfully conspire together and with another person and persons who identity is unknown to commit the crime of Insurance Fraud, in violation of Section 550(a)(6) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

- 1. On or about November 15, 2004, Munir Uwaydah, an orthopedic surgeon, and Paul Turley incorporated Frontline Medical Associates.**
- 2. On March 26, 2007, Golden State Pharmaceuticals was incorporated by Marisa Schermbeck-Nelson in order to serve Frontline patients exclusively. The address of Golden State Pharmaceuticals was 768 Calle Plano, Camarillo, CA 93012.**
- 3. On February 23, 2010, Firstline Health, Inc. was incorporated by TATIANA ARNOLD, and took over Frontline operations.**
- 4. On October 3, 2012, Fusion Pharmacy filed a Statement of Information with the California Secretary of State which listed TERRY LUKE as the CEO, and which stated its principal executive office was located at 768 Calle Plano, Camarillo, CA 93012.**
- 5. On April 18, 2013, Firstline Health filed a Statement of Information with the California Secretary of State which listed TATIANA ARNOLD as the Assistant Treasurer of Firstline Health.**
- 6. Between November 15, 2004, and August 21, 2015, in order to obtain patients for Frontline Medical Associates and Firstline Health, UWAYDAH and PAUL TURLEY paid "marketers" (aka "cappers") and attorneys for patient referrals. These payments were made from various bank accounts and through various co-conspirators.**
- 7. Between November 2004 and August 2015, false bills were regularly and routinely submitted to insurance companies from Frontline Medical Associates, Firstline Health, Golden State Pharmaceuticals, South Bay Surgical and Spine Institute, U.S. Health and Orthopedics, Controlled Health Management, Ventura County Collections, and other business entities related to Munir Uwaydah and/or Paul Turley.**
- 8. Between February 14, 2013 and May 15, 2013, DAI Edgar Murguia posed as a Worker's Compensation patient in an undercover capacity and sought treatment from Dr. Aun, which resulted in Zenith Insurance Company receiving fraudulent billings by Dr. Johnson and Firstline Health Inc.**
- 9. Between February 2011 and February 2015, business entities related to Munir Uwaydah and/or Paul Turley billed insurance companies in excess of 150 Million dollars. In addition, these entities have claims before the Worker's Compensation Appeals Board for the same time period exceeding 150 Million dollars.**

10. Between June 1, 2005, and December 31, 2011, YOLANDA GROSCOST, owner and operator of YDG Marketing, and UWAYDAH made an agreement that she would refer 20-30 patients a month their clinics and in exchange she would be paid \$10,000 a month. In addition, GROSCOST was promised cash bonuses if she referred surgery patients, or if referrals exceeded 30 patients a month.
11. Between February 2010 and August 2015, TATIANA ARNOLD made payments to YOLANDA GROSCOST and/or YDG Marketing, or caused these payments to be made.
12. Between February 2010 and August 2015, TATIANA ARNOLD made payments to TONY FOLGAR and/or AGD Marketing, or caused these payments to be made.
13. Between February 2010 and August 2015, TERRY LUKE made payments to YOLANDA GROSCOST and/or YDG Marketing, or caused these payments to be made.
14. Between February 2010 and August 2015, TERRY LUKE made payments to TONY FOLGAR and/or AGD Marketing, or caused these payments to be made.
15. On or between February 2010 and August 2015 TERRY LUKE and TATIANA TORRES ARNOLD caused money to be wired from Firstline bank accounts and/or related bank accounts to Lebanon, Estonia, Germany, Mexico, and other countries.
16. Between January 1, 2009 and December 31, 2010, TATIANA ARNOLD, Paul Turley, Ronnie Case, and Jeff Stevens bought shares of the Ventura County Business Bank.
17. On March 26, 2010, TATIANA ARNOLD signed an affidavit under oath stating she had no relationship, business or otherwise, with other investors or existing shareholders of Ventura County Business Bank.
18. Between 2009 and 2015, TATIANA ARNOLD, TERRY LUKE, TONY FOLGAR, AND YOLANDA GROSCOST filed California tax returns that did not accurately reflect their relationship with, or income from, Firstline Health or related entities.
19. Between August 2008 and June 2010, Dr. Uwaydah's physician assistant, Peter Nelson, performed surgical procedures on Dr. Uwaydah's patients while the patients were under general anesthesia and while Dr. Uwaydah was not present in the operating room.

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Money Laundering 2-27

COUNT 2

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about December 28, 2011, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$5,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit:

Insurance Fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 3

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between January 2, 2012 and January 31, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 4

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 1, 2012 and February 28, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 5

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2012 and March 30, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 6

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between April 1, 2012 and April 30, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 7

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between May 1, 2012 and May 30, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 8

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between June 1, 2012 and June 30, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 9

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between July 2, 2012 and July 31, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 10

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between August 1, 2012 and August 30, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 11

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 19, 2012, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$5,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 12

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between October 2, 2012 and October 31, 2012, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 13

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between November 1, 2012 and November 30, 2012, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 14

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between December 2, 2012 and December 31, 2012, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 15

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between January 1, 2013 and January 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 16

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 1, 2013 and February 28, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 17

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2013 and March 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 18

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between April 1, 2013 and April 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 19

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between May 1, 2013 and May 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 20

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between June 1, 2013 and June 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 21

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between July 2, 2013 and July 31, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 22

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between August 1, 2013 and August 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 23

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between September 1, 2013 and September 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 24

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between October 2, 2013 and October 31, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 25

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between November 1, 2013 and November 30, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 26

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between December 2, 2013 and December 31, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$25,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 27

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **MONEY LAUNDERING**, in violation of **Penal Code Section 186.10(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 6, 2014, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$5,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Insurance Fraud**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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Illegal Patient Referral 28-57

COUNT 28

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TONY FOLGAR and TERRY LUKE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about July 3, 2012, in the County of Los Angeles, the said **TONY FOLGAR and TERRY LUKE** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 29

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **YOLANDA GROSCOST and TERRY LUKE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about July 12, 2012, in the County of Los Angeles, the said **YOLANDA GROSCOST and TERRY LUKE** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

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COUNT 30

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TERRY LUKE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about August 21, 2012, in the County of Los Angeles, the said **YOLANDA GROSCOST and TERRY LUKE** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 31

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 3, 2012, in the County of Los Angeles, the said **TONY FOLGAR and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 32

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about December 3, 2012, in the County of Los Angeles, the said **TONY FOLGAR and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 33

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about December 26, 2012, in the County of Los Angeles, the said **TONY FOLGAR and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 34

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 29, 2013, in the County of Los Angeles, the said **TONY FOLGAR and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 35

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 18, 2013, in the County of Los Angeles, the said **TONY FOLGAR and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 36

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TONY FOLGAR and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about November 20, 2013, in the County of Los Angeles, the said **TONY FOLGAR and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 37

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 15, 2012, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 38

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about November 14, 2012, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 39

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about December 11, 2012, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

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COUNT 40

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 17, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 41

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about February 15, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 42

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 18, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 43

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about April 15, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 44

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about May 14, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 45

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about June 11, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 46

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about July 12, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 47

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about August 16, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 48

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 11, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 49

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 14, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

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COUNT 50

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about November 13, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 51

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about December 10, 2013, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 52

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 8, 2014, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 53

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about February 10, 2014, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 54

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about April 10, 2014, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 55

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about May 13, 2014, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 56

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about June 11, 2014, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

COUNT 57

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST and TATIANA ARNOLD** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL CLIENT OR PATIENT REFERRAL**, in violation of **Labor Code Section 3215**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about July 9, 2014, in the County of Los Angeles, the said **YOLANDA GROSCOST and TATIANA ARNOLD** did individually, and through employees and agents, offer, deliver, receive, and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration, whether in the form of money or otherwise, as compensation and inducement for referring clients and patients to perform and obtain services and benefits.

* * * * *

Tax Charges 58-74

COUNT 58

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 14, 2011, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 59

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 15, 2012, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

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COUNT 60

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 15, 2013, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

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COUNT 61

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TERRY LUKE** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 15, 2014, in the Counties of Los Angeles and Ventura, the said **TERRY LUKE** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 62

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 17, 2011, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 63

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 15, 2012, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 64

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 11, 2013, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 65

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TATIANA ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 8, 2014, in the Counties of Los Angeles and Ventura, the said **TATIANA ARNOLD** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 66

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about August 24, 2011, in the Counties of Los Angeles and Ventura, the said **TONY FOLGAR** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 67

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 19, 2013, in the Counties of Los Angeles and Ventura, the said **TONY FOLGAR** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 68

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 16, 2014, in the Counties of Los Angeles and Ventura, the said **TONY FOLGAR** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 69

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TONY FOLGAR** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FILING FALSE TAX RETURN**, in violation of **Revenue & Taxation Code Section 19705(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about December 29, 2014, in the Counties of Los Angeles and Ventura, the said **TONY FOLGAR** did unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19705.

* * * * *

COUNT 70

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FAILURE TO FILE INCOME TAX RETURN**, in violation of **Revenue & Taxation Code Section 19706**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about August 23, 2011, in the Counties of Los Angeles and Ventura, the said **YOLANDA GROSCOST** did willfully and unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19706.

* * * * *

COUNT 71

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FAILURE TO FILE INCOME TAX RETURN**, in violation of **Revenue & Taxation Code Section 19706**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 13, 2012, in the Counties of Los Angeles and Ventura, the said **YOLANDA GROSCOST** did willfully and unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19706.

* * * * *

COUNT 72

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FAILURE TO FILE INCOME TAX RETURN**, in violation of **Revenue & Taxation Code Section 19706**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 28, 2013, in the Counties of Los Angeles and Ventura, the said **YOLANDA GROSCOST** did willfully and unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19706.

* * * * *

COUNT 73

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FAILURE TO FILE INCOME TAX RETURN**, in violation of **Revenue & Taxation Code Section 19706**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about April 13, 2014, in the Counties of Los Angeles and Ventura, the said **YOLANDA GROSCOST** did willfully and unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19706.

* * * * *

COUNT 74

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **YOLANDA GROSCOST** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **FAILURE TO FILE INCOME TAX RETURN**, in violation of **Revenue & Taxation Code Section 19706**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 5, 2015, in the Counties of Los Angeles and Ventura, the said **YOLANDA GROSCOST** did willfully and unlawfully fail to file any tax return or supply any information with intent to evade any tax imposed by the Personal Income Tax Law or Corporation Tax Law is guilty of a Revenue and Taxation Code section 19706.

* * * * *

Aggravated Mayhem

COUNT 75

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TATIANA TORRES ARNOLD** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **AGGRAVATED MAYHEM**, in violation of **Penal Code Section 205**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between March 1, 2009 and March 15, 2009, in the County of Los Angeles, the said **TATIANA TORRES ARNOLD**, did unlawfully and under circumstances manifesting extreme indifference to the physical and psychological well being of another, intentionally caused permanent disability and disfigurement and deprivation of a limb, organ and body member of **Kimberly Pope**.

“NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c).”

* * * * *

It is further alleged, pursuant to Penal Code Section 186.11(a), that the offenses set forth in counts 1-75 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

It is further alleged as to Count 1 that in the commission of the above offenses the said defendants **TATIANA TORRES ARNOLD**, **TERRY LUKE**, **TONY FOLGAR** and **YOLANDA GROSCOST**, with the intent to do so, took, damaged and destroyed property of a value exceeding \$3,200,000, within the meaning of Penal Code Section 12022.6(a)(4).

It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(C), that, as to defendant **TERRY LUKE**, the value of the transactions charged in Counts 2, 3, 4, 5, 6, 7, 8, 9 and 10 exceeds one million dollars (\$1,000,000), but is less than two million five hundred thousand dollars (\$2,500,000)

It is further alleged, pursuant to Penal Code 186.10(c)(1)(D), that, as to defendant **TATIANA TORRES ARNOLD**, the value of the transactions charged in Counts 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26 and 27 exceeds two million five hundred thousand dollars (\$2,500,000).

* * * * *

DEFENDANTS

BOOKING NO.

BAIL RECOM'D

BAIL

1. TATIANA TORRES ARNOLD

_____ \$ 2,730,000 _____

2. TERRY LUKE

_____ \$ 1,215,000 _____

3. TONY FOLGAR

_____ \$ 1,020,000 _____

4. YOLANDA GROSCOST

_____ \$ 1,340,000 _____