SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

04/03/2017
09:20 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF0802

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

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

COUNT 1: On or about and between February 11, 2011 and September 01, 2015, in violation of Section 550(a)(6) of the Penal Code (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, TANYA MORELAND KING did unlawfully conspire with TANYA MORELAND KING AND CHRISTOPHER KING AND OTHER UNKNOWN INDIVIDUALS, with the intent to defraud, to make a false and fraudulent claim to WORKERS' COMPENSATION INSURANCE CARRIERS IN 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:

OVERT ACT 1

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

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OVERT ACT 2

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

OVERT ACT 3

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

OVERT ACT 4

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

OVERT ACT 5

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

OVERT ACT 6

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

OVERT ACT 7

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

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OVERT ACT 8

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

OVERT ACT 9

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

OVERT ACT 10

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

OVERT ACT 11

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

OVERT ACT 12

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

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OVERT ACT 13

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

OVERT ACT 14

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

OVERT ACT 15

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

OVERT ACT 16

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

OVERT ACT 17

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

OVERT ACT 18

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

OVERT ACT 19

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

OVERT ACT 20

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

OVERT ACT 21

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

OVERT ACT 22

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

OVERT ACT 23

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

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OVERT ACT 24

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

OVERT ACT 25

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

OVERT ACT 26

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

OVERT ACT 27

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

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OVERT ACT 28

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

OVERT ACT 29

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

OVERT ACT 30

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

OVERT ACT 31

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

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OVERT ACT 32

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

OVERT ACT 33

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

COUNT 69: On or about and between April 04, 2013 and February 16, 2016, in violation of Section 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the intent to defraud, did unlawfully conceal and knowingly fail to disclose, and did knowingly assist with another person to conceal and fail to disclose the occurrence of an event and a fact that affected the initial and continued material right and entitlement of 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 and her Company One Source Labs Inc. and King Medical Management Inc., paid kickbacks to physicians to procured orders for urine toxicology for workers compensation patients and paid $60 flat rate for the quantitative tests performed by Pacific Toxicology.

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COUNT 70: On or about and between April 04, 2013 and February 26, 2016, in violation of Section 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the intent to defraud, did unlawfully conceal and knowingly fail to disclose, and did knowingly assist with another person to conceal and fail to disclose the occurrence of an event and a fact that affected the initial and continued material right and entitlement of 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 and her Company Monarch Medical Group, paid kickbacks to physicians to distribute oral medications that MMG purchased from Pharmaceutical Wholesalers including NuCare Pharmaceuticals and AS Medication Solutions

COUNT 71: On or about and between April 04, 2013 and September 29, 2014, in violation of Section 550(b)(3) of the Penal Code (INSURANCE FRAUD), a FELONY, TANYA MORELAND KING, with the intent to defraud, did unlawfully conceal and knowingly fail to disclose, and did knowingly assist with another person to conceal and fail to disclose the occurrence of an event and a fact that affected the initial and continued material right and entitlement of 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 and her Company Monarch Medical Group, paid kickbacks to physicians to procured prescriptions for Compound transdermal creams manufactured by Steven's Pharmacy and failed to disclose that she only paid Steven's Pharmacy $40 for each 120 gram tube.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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ENHANCEMENT(S)

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

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

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

Dated 04-03-2017 at Orange County, California.
KS/AC 17F00373

TONY RACKAUCKAS, DISTRICT ATTORNEY

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

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RESTITUTION CLAIMED

[ ] None
[ ] $_____
[X] To be determined

BAIL RECOMMENDATION:

TANYA MORELAND KING - $ 500,000.00

NOTICES:

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

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