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ATTORNEYS FOR THE PEOPLE OF THE STATE OF CALIFORNIA

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ORIGINAL FILED
Superior Court of California
County of Los Angeles

JUL 06 2020

Sherri R. Carter, Executive Officer/Clerk

By J. Colbert, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, NORWALK COURTHOUSE

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

1. **GEVORK GEORGE TER-MKRTCHYAN,**
ALIAS GEVORK TERMKRTCHYAN
(DOB: 05/13/1962)
2. **SYUZAN HARUTYUNYAN,** *ALIAS SUZAN*
HARUTYUNYAN, SYUZAN GAGIKOVNA
(DOB: 09/29/1977)
3. **KARIM ADLY SOLIMAN,**
(DOB: 02/10/1954)
4. **LORRAINE ALTHIA WATSON,** *ALIAS*
LORRAINE A. CUMMINS (DOB: 09/14/1963)
5. **ASHOT MAMIKONYAN,** (DOB: 05/31/1959)
6. **MORENA GUADALUPE MORENO,** *ALIAS*
GUADALUPE M. MORENO, MORENA GUADALUPE
TOBAR (DOB: 11/08/1966)
7. **JESSICA VILLA,** (DOB: 10/09/1990)
8. **MARIA D. VAZQUEZ,** *ALIAS MARIA*
DELOSANGELES VAZQUEZ (DOB: 10/08/1991)

FELONY COMPLAINT

Case No. VA153639

AG Docket No. LA2016104351

Charges:

- Ct 1: WIC §14107(b)(4) – Healthcare Fraud
(FPACT Program) – *All Defendants*
Ct 2: PC §550(a)(6) – False Claims – *All*
Defendants except Moreno
Ct 3: PC §550(b)(3) – Insurance Fraud – *All*
Defendants
Ct 4: BPC §2052(a) – Unauthorized Practice of
Medicine – *Mamikonyan Only*
Ct 5: BPC §2052(b) – Aiding/Abetting the
Unauthorized Practice of Medicine –
Harutyunyan Only
Ct 6: WIC §14107.2(a)(1) – Accepting Kickbacks
– *Moreno Only*
Ct 7: WIC §14107.2(b)(1) – Offering Kickbacks
– *Moreno Only*
Ct 8: PC §487(a), Grand Theft– *All Defendants*

Special Allegations:

- PC §186.11(a)(3) - White Collar Crime
Enhancement (Loss > \$100,000) – *All Defendants*
PC §186.11(a)(2) - White Collar Crime
Enhancement (Loss > \$500,000) – *All Defendants*
PC §1203.045(a) – Probation Limitation (Theft >
\$100,000) – *All Defendants*
PC §803(c)/PC §801.5

1 9. ANNA MARIE SOTO, ALIAS ANNA MARIE
2 GONZALEZ (DOB: 02/22/1978)

3 **Defendants.**

4 Based on information and belief, the undersigned declares that, before the filing of this Felony
5 Complaint, the defendants GEVORK G. TER-MKRTCHYAN, SYUZAN HARUTYUNYAN,
6 KARIM A. SOLIMAN, LORRAINE A. WATSON, ASHOT MAMIKONYAN, MORENA G.
7 MORENO, JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO committed the
8 following crimes in the County of Los Angeles and elsewhere in the State of California:

9 **COUNT 1:**
10 **Welfare & Institutions §14107(b)(4) – Healthcare Fraud (FPACT Program)**
11 **(All Defendants)**

12 Beginning on or about January 1, 2014 and continuing on through at least December 14, 2016,
13 defendants GEVORK G. TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, KARIM A.
14 SOLIMAN, LORRAINE A. WATSON, ASHOT MAMIKONYAN, MORENA G. MORENO,
15 JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO did knowingly and willfully,
16 by their conduct, or by aiding and abetting *All Care One Community Health Center*, execute a scheme
17 or artifice to defraud the State of California's Family Planning, Access, Care and Treatment (hereafter
18 FPACT) program, in violation of Welfare & Institutions Code §14107(b)(4), a felony.

19 **COUNT 2:**
20 **Penal Code §550(a)(6) – False Claims**
21 **(All Defendants Except Moreno)**

22 Beginning on or about January 1, 2014 and continuing on through at least December 14, 2016,
23 defendants GEVORK TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, KARIM A. SOLIMAN,
24 LORRAINE A. WATSON, ASHOT MAMIKONYAN, JESSICA VILLA, MARIA D. VAZQUEZ,
25 and ANNA MARIE SOTO did aid, abet, solicit, conspire with each other and others to, and did
26 knowingly make or cause to be made a false or fraudulent claim for payment of a health care benefit
27 under the State of California's FPACT program, in violation of Penal Code §550(a)(6), a felony.

28 It is further alleged that the loss at issue exceeds \$950.

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COUNT 3:
Penal Code §550(b)(3) – Insurance Fraud
(All Defendants)

Beginning on or about January 1, 2014 and continuing on through at least December 14, 2016, defendants GEVORK TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, KARIM A. SOLIMAN, LORRAINE A. WATSON, ASHOT MAMIKONYAN, MORENA G. MORENO, JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO did, or knowingly assisted and conspired with each other and with others to, conceal or fail to disclose the occurrence of events that affected the initial and continued right and entitlement of certain persons to insurance benefits and payments in excess of \$950 under the State of California's FPACT program, in violation of Penal Code §550(b)(3), a felony.

COUNT 4:
Business & Professions Code §2052(a) – Unauthorized Practice of Medicine
(Defendant Mamikonyan only)

Beginning on or about August 15, 2013 and continuing on through at least July 10, 2016, defendant ASHOT MAMIKONYAN unlawfully practiced, or held himself out as practicing, medicine and did diagnose, treat, and prescribe to individuals in the State of California, without having a valid licensure to do so, in violation of Business & Professions Code §2052(a), a felony.

COUNT 5:
Business & Professions Code §2052(b) - Aiding or Abetting
the Unauthorized Practice of Medicine
(Defendant Harutyunyan only)

Beginning on or about August 15, 2013 and continuing on through at least July 10, 2016, defendant SYUZAN HARUTYUNYAN, aided and abetted another, *to wit: Ashot Mamikonyan*, to unlawfully practice, or hold himself out as practicing, medicine and to diagnose, treat, and prescribe to individuals in the State of California, without his having a valid licensure to do so, in violation of Business & Professions §2052(b), a felony.

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COUNT 6:

**Welfare & Institutions Code §14107.2(a)(1) –Accepting Kickbacks
(Defendant Moreno only)**

Beginning on or about December 1, 2015 and continuing on through at least August 2, 2016, defendant MORENA G. MORENO did unlawfully solicit or accept remuneration, directly or indirectly, overtly or covertly, in return for the referral of individuals to *All Care One Community Health Center* for the furnishing of services paid for by the State of California's FPACT program, in violation of Welfare & Institutions Code §14107.2(a)(1), a felony.

COUNT 7:

**Welfare & Institutions Code §14107.2(b)(1) – Offering Kickbacks
(Defendant Moreno only)**

Beginning on or about March 1, 2014 and continuing on through at least August 2, 2016, defendant MORENA G. MORENO unlawfully offered to pay or did pay a kickback or bribe, directly or indirectly, overtly or covertly, in cash or in valuable consideration of any kind, to individuals to induce them to go to *All Care One Community Health Center* for the furnishing of services paid for by the State of California's FPACT program, in violation of Welfare & Institutions Code §14107.2(b)(1), a felony.

COUNT 8:

**Penal Code §487(a) – Grand Theft
(All Defendants)**

Beginning on or about January 1, 2014 and continuing on through at least December 14, 2016 defendants GEVORK TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, KARIM A. SOLIMAN, LORRAINE A. WATSON, ASHOT MAMIKONYAN, MORENA G. MORENO, JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO did knowingly and willfully, by their conduct, or by aiding and abetting *All Care One Community Health Center*, or acting in conspiracy with co-conspirators, willfully or unlawfully take, or cause the taking, from State of California's FPACT program, money or goods valued at more than \$950, in violation of Penal Code §487(a), a felony.

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SPECIAL ALLEGATIONS

**Penal Code §186.11(a)(3)
White Collar Crime Enhancement - Loss Over \$100,000
(All Defendants)**

It is further alleged that the crimes committed by defendants GEVORK G. TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, ASHOT MAMIKONYAN, KARIM A. SOLIMAN, LORRAINE A. WATSON, JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO in Counts 1, 2, 3, and 8, and defendant MORENA G. MORENO, in Counts 1, 3 and 8, are related felonies, a material element of which is fraud. It is further alleged that these related felonies resulted in the taking of more than \$100,000, within the meaning of Penal Code §186.11(a)(3).

**Penal Code §186.11(a)(2)
White Collar Crime Enhancement - Loss Over \$500,000
(All Defendants)**

It is further alleged that the crimes committed by defendants GEVORK G. TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, ASHOT MAMIKONYAN, KARIM A. SOLIMAN, LORRAINE A. WATSON, JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO in Counts 1, 2, 3 and 8, and defendant MORENA G. MORENO, in Counts 1, 3 and 8 are related felonies, a material element of which is fraud. It is further alleged that these related felonies resulted in the taking of more than \$500,000, within the meaning of Penal Code §186.11(a)(2).

**Probation Limitation §1203.045(a)
Theft Exceeding \$100,000
(All Defendants)**

It is further alleged that the theft committed by defendants GEVORK TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, ASHOT MAMIKONYAN, KARIM A. SOLIMAN, LORRAINE A. WATSON, MORENA G. MORENO, JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO, charged in Count 8 resulted in the taking of more than \$100,000, within the meaning of Penal Code §1203.045(a).

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Penal Code §§801.5, 803(c)
Statute of Limitations
People v. Zamora Allegation (18 Cal. 3d 542)

It is further alleged, pursuant to Penal Code §§ 801.5 and 803(c), that a four-year statute of limitations applies to the following crimes:

Count 1 (WIC §14107(b)(4) - Healthcare Fraud), **Count 2** (PC §550(a)(6) – False Claims), and **Count 3** (PC §550(b)(3) – Insurance Fraud), because they are all felonies, a material element of which is fraud, and **Count 8** (PC §487(a) – Grand Theft) because it is a grand theft offense, and these offenses were ongoing until at least December 14, 2016, when All Care One Community Health Center was disenrolled from the FPACT program as a result of the Department of Health Care Service's (DHCS) audit and findings;

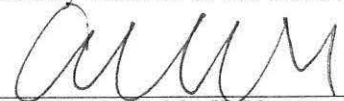
Counts 4-5 (BPC §2052(a) – Unauthorized Practice of Medicine and BPC §2052(b) - Aiding and Abetting the Unauthorized Practice of Medicine) because they are felonies, a material element of which is fraud, and the date of discovery exception applies. No victims of the offenses, i.e. DHCS, which administers the FPACT program, and no law enforcement agencies charged with the investigation and prosecution of these offenses had knowledge of MAMIKONYAN's conduct until at least September 11, 2017, when Special Agents interviewed All Care employee, Biayne De Dios, and learned for the first time that MAMIKONYAN was treating patients at All Care without a license;

Count 6 (WIC §14107.2(a)(1) – Accepting Kickbacks) and **Count 7** (WIC §14107.2(b)(1) – Offering Kickbacks) because they are felonies, a material element of which is fraud, and the offenses were ongoing until at least August 2, 2016, when MORENO was issued a check by All Care One Community Health Center for her recruiting and referral services.

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

Dated: July 4, 2020

XAVIER BECERRA,
Attorney General of the State of California


AISHWARYA NAIDU,
Deputy Attorney General
California Department of Justice
Declarant

1 **RESTITUTION CLAIMED**

2 [X] To be determined

3
4 **BAIL REQUEST:**

5 \$405,000 per 2020 Bail Schedule if defendant Ter-Mkrtchyan fails to appear at
6 arraignment after receiving a notice to appear

7 \$370,000 per 2020 Bail Schedule if remaining defendants fail to appear at arraignment
8 after receiving notice to appear

9 **PURSUANT TO PENAL CODE § 1054.5(b), THE PEOPLE ARE HEREBY INFORMALLY**
10 **REQUESTING THAT DEFENDANTS' COUNSEL PROVIDE DISCOVERY TO THE**
11 **PEOPLE AS REQUIRED BY PENAL CODE § 1054.3.**
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HOLDING ORDER

Based on the evidence presented at the preliminary hearing, it appears that the offenses charged in this Felony Complaint have been committed and that there is sufficient cause to believe that the defendant is guilty of these offenses.

IT IS ORDERED, pursuant to Penal Code §§ 872 and 875, that defendants GEVORK G. TER-MKRTCHYAN, SYUZAN HARUTYUNYAN, KARIM A. SOLIMAN, LORRAINE A. WATSON, ASHOT MAMIKONYAN, MORENA G. MORENO, JESSICA VILLA, MARIA D. VAZQUEZ, and ANNA MARIE SOTO are held to answer to the following offenses:

Defendant	Charges/Enhancements
(1) GEVORK G. TER-MKRTCHYAN	Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program) Ct 2: PC §550(a)(6) – False Claims Ct 3: PC §550(b)(3) – Insurance Fraud Ct 8: PC §487(a), Grand Theft PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000) PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000) PC §1203.045(a) – Probation Limitation (Theft > \$100,000) PC §803(c)/PC §801.5 – Statute of Limitations
(2) SYUZAN HARUTYUNYAN	Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program) Ct 2: PC §550(a)(6) – False Claims Ct 3: PC §550(b)(3) – Insurance Fraud Ct 5: BPC §2052(b) – Aiding and Abetting the Unauthorized Practice of Medicine Ct 8: PC §487(a), Grand Theft PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000) PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000) PC §1203.045(a) – Probation Limitation (Theft > \$100,000) PC §803(c)/PC §801.5 – Statute of Limitations

<p>(3) KARIM A. SOLIMAN</p>	<p>Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program) Ct 2: PC §550(a)(6) – False Claims Ct 3: PC §550(b)(3) – Insurance Fraud Ct 8: PC §487(a), Grand Theft</p> <p>PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000) PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000) PC §1203.045(a) – Probation Limitation (Theft > \$100,000) PC §803(c)/PC §801.5 – Statute of Limitations</p>
<p>(4) LORRAINE A. WATSON</p>	<p>Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program) Ct 2: PC §550(a)(6) – False Claims Ct 3: PC §550(b)(3) – Insurance Fraud Ct 8: PC §487(a), Grand Theft</p> <p>PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000) PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000) PC §1203.045(a) – Probation Limitation (Theft > \$100,000) PC §803(c)/PC §801.5 – Statute of Limitations</p>
<p>(5) ASHOT MAMIKONYAN</p>	<p>Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program) Ct 2: PC §550(a)(6) – False Claims Ct 3: PC §550(b)(3) – Insurance Fraud Ct 4: BPC §2052(a) –Unauthorized Practice of Medicine Ct 8: PC §487(a), Grand Theft</p> <p>PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000) PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000) PC §1203.045(a) – Probation Limitation (Theft > \$100,000) PC §803(c)/PC §801.5 – Statute of Limitations</p>

(6) MORENA G. MORENO	<p>Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program)</p> <p>Ct 3: PC §550(b)(3) – Insurance Fraud</p> <p>Ct 6: WIC §14107.2(a)(1) – Accepting Kickbacks</p> <p>Ct 7: WIC §14107.2(b)(1) – Offering Kickbacks</p> <p>Ct 8: PC §487(a), Grand Theft</p> <p>PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000)</p> <p>PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000)</p> <p>PC §1203.045(a) – Probation Limitation (Theft > \$100,000)</p> <p>PC §803(c)/PC §801.5 – Statute of Limitations</p>
(7) JESSICA VILLA	<p>Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program)</p> <p>Ct 2: PC §550(a)(6) – False Claims</p> <p>Ct 3: PC §550(b)(3) – Insurance Fraud</p> <p>Ct 8: PC §487(a), Grand Theft</p> <p>PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000)</p> <p>PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000)</p> <p>PC §1203.045(a) – Probation Limitation (Theft > \$100,000)</p> <p>PC §803(c)/PC §801.5 – Statute of Limitations</p>

<p>(8) MARIA D. VAZQUEZ</p>	<p>Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program) Ct 2: PC §550(a)(6) – False Claims Ct 3: PC §550(b)(3) – Insurance Fraud Ct 8: PC §487(a), Grand Theft</p> <p>PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000) PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000) PC §1203.045(a) – Probation Limitation (Theft > \$100,000) PC §803(c)/PC §801.5 – Statute of Limitations</p>
<p>(9) ANNA MARIE SOTO</p>	<p>Ct 1: WIC §14107(b)(4) – Healthcare Fraud (FPACT Program) Ct 2: PC §550(a)(6) – False Claims Ct 3: PC §550(b)(3) – Insurance Fraud Ct 8: PC §487(a), Grand Theft</p> <p>PC §186.11(a)(3) - White Collar Crime Enhancement (Loss > \$100,000) PC §186.11(a)(2) - White Collar Crime Enhancement (Loss > \$500,000) PC §1203.045(a) – Probation Limitation (Theft > \$100,000) PC §803(c)/PC §801.5 – Statute of Limitations</p>

In my capacity as Judge of the Superior court, I deem the within Complaint to be the Information and order it filed as such in the Superior Court.

Dated this ____ day of _____, 20__

JUDGE OF THE SUPERIOR COURT