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Attorney General of the State of California  
2 DIVISION OF MEDI-CAL FRAUD & ELDER ABUSE  
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6 *Attorneys for Plaintiff*

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES, Central District

10  
11 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

12 Plaintiff,

13 v.

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15  
16 **PO LONG LEW,**  
17 [DOB: ██████████]

18 Defendant.

Case No.: **B14484213**

**FELONY COMPLAINT  
FOR ARREST WARRANT**

**Count 1 H&S 11153  
Count 2 H&S 11153  
Count 3 H&S 11153  
Count 4 H&S 11153  
Count 5 H&S 11153  
Count 6 H&S 11153  
Count 7 H&S 11153  
Count 8 H&S 11153  
Count 9 H&S 11153  
Count 10 H&S 11153**

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20 The People of the State of California hereby allege that in the County of Los Angeles, State  
21 of California, and before the making or filing of the complaint, the above-mentioned defendant  
22 did commit the following crime(s):

23 **COUNT 1**

24 **KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR**  
25 **OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

26 (Health & Safety Code section 11153 – 16 months, 2 or 3 years)

27 On or about December 4, 2018, in the County of Los Angeles, State of California,  
28 defendant **PO LONG LEW**, knowingly issued a prescription for Xanax, a controlled substance,

2018 NOV -2 PM 13  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

1 that was not for a legitimate medical purpose, in violation of section 11153 of the Health &  
2 Safety Code, a felony.

3 **COUNT 2**

4 **KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR**  
5 **OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

6 (Health & Safety Code section 11153 – 16 months, 2 or 3 years)

7 On or about December 4, 2018, in the County of Los Angeles, State of California,  
8 defendant **PO LONG LEW**, knowingly issued a prescription for Ativan, a controlled substance,  
9 that was not for a legitimate medical purpose, in violation of section 11153 of the Health &  
10 Safety Code, a felony.

11 **COUNT 3**

12 **KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR**  
13 **OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

14 (Health & Safety Code section 11153 – 16 months, 2 or 3 years)

15 On or about February 25, 2019, in the County of Los Angeles, State of California,  
16 defendant **PO LONG LEW**, knowingly issued a prescription for Xanax, a controlled substance,  
17 that was not for a legitimate medical purpose, in violation of section 11153 of the Health &  
18 Safety Code, a felony.

19 **COUNT 4**

20 **KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR**  
21 **OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

22 (Health & Safety Code section 11153 – 16 months, 2 or 3 years)

23 On or about March 6, 2019, in the County of Los Angeles, State of California, defendant  
24 **PO LONG LEW**, knowingly issued prescriptions for Ativan and Soma, both controlled  
25 substances, that were not for a legitimate medical purpose, in violation of section 11153 of the  
26 Health & Safety Code, a felony.

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**COUNT 5**

**KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR  
OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

(Health & Safety Code section 11153 – 16 months, 2 or 3 years)

On or about April 8, 2019, in the County of Los Angeles, State of California, defendant **PO LONG LEW**, knowingly issued a prescription for Xanax, a controlled substance, that was not for a legitimate medical purpose, in violation of section 11153 of the Health & Safety Code, a felony.

**COUNT 6**

**KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR  
OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

(Health & Safety Code section 11153 – 16 months, 2 or 3 years)

On or about April 10, 2019, in the County of Los Angeles, State of California, defendant **PO LONG LEW**, knowingly issued prescriptions for Ativan and Soma, both controlled substances, that were not for a legitimate medical purpose, in violation of section 11153 of the Health & Safety Code, a felony.

**COUNT 7**

**KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR  
OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

(Health & Safety Code section 11153 – 16 months, 2 or 3 years)

On or about May 7, 2019, in the County of Los Angeles, State of California, defendant **PO LONG LEW**, knowingly issued prescriptions for Xanax and Soma, both controlled substances, that were not for a legitimate medical purpose, in violation of section 11153 of the Health & Safety Code, a felony.

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**COUNT 8**

**KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR  
OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

(Health & Safety Code section 11153 – 16 months, 2 or 3 years)

On or about May 9, 2019, in the County of Los Angeles, State of California, defendant **PO LONG LEW**, knowingly issued prescriptions for Ativan and Soma, both controlled substances, that were not for a legitimate medical purpose, in violation of section 11153 of the Health & Safety Code, a felony.

**COUNT 9**

**KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR  
OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

(Health & Safety Code section 11153 – 16 months, 2 or 3 years)

On or about October 30, 2019, in the County of Los Angeles, State of California, defendant **PO LONG LEW**, knowingly issued prescriptions for Xanax, a controlled substance, that was not for a legitimate medical purpose, in violation of section 11153 of the Health & Safety Code, a felony.

**COUNT 10**

**KNOWINGLY PRESCRIBING A CONTROLLED SUBSTANCE FOR  
OTHER THAN A LEGITIMATE MEDICAL PURPOSE**

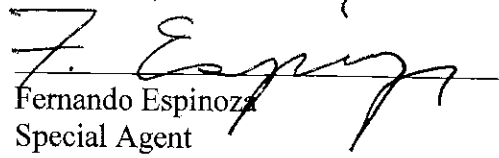
(Health & Safety Code section 11153 – 16 months, 2 or 3 years)

On or about October 30, 2019, in the County of Los Angeles, State of California, defendant **PO LONG LEW**, knowingly issued prescriptions for Xanax, Ativan and Soma, all controlled substances, that were not for a legitimate medical purpose, in violation of section 11153 of the Health & Safety Code, a felony.

///

**DECLARATION**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed this 2nd of November, 2020, in Los Angeles, California.



Fernando Espinoza  
Special Agent  
California Department of Justice  
Division of Medi-Cal Fraud and Elder Abuse

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IT IS ORDERED that arrest warrants shall issue for the following person, who is to be admitted to bail in the sum of:

Defendant	Suggested Bail	Bail
PO LONG LEW	\$25,000	\$ _____

_____	_____
Date	Magistrate

Agency: Division of Medi-Cal Fraud and Elder Abuse  
California Department of Justice  
Law Enforcement Agency No. 0132  
I/O Fernando Espinoza, ID #

DESCRIPTION OF DEFENDANTS

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NAME: PO LONG LEW

DOB: [REDACTED]

CII No. [REDACTED]

CDL No. [REDACTED]

Sex: Male

Race: Asian

Hair: Black

Eyes: Brown

Height: 5'06"

Weight: 145

Address: (Last known) [REDACTED]

1 **REQUEST FOR DISCOVERY**

2 Pursuant to Penal Code section 1054.5(b), the People request from defendants and defense  
3 counsel all materials and information required to be disclosed to the prosecution by the defense  
4 under the authority of Penal Code section 1054.3, including the following:

5 1. The names and addresses of persons, other than the defendants, whom the defendants  
6 intend to call as witnesses at trial. [Penal Code section 1054.3(a).]

7 2. Any relevant written or recorded statements of persons whom the defendants intend  
8 to call as witnesses at trial. [Penal Code section 1054.3(a).]

9 3. Any reports of the statements persons whom the defendants intend to call as  
10 witnesses at trial. [Penal Code section 1054.3(a).]

11 4. Any reports or statements of experts made in connection with the case. [Penal Code  
12 section 1054.3(a).]

13 5. Any results of physical or mental examinations, scientific tests, experiments or  
14 comparisons which the defendants intend to offer in evidence at the trial. [Penal Code section  
15 1054.3(a).]

16 6. The opportunity to view “[a]ny real evidence which the defendants intend to offer in  
17 evidence at the trial.” [Penal Code section 1054.3(b).]

18 This is a continuing request for the above information. If the information becomes available  
19 at a future time, the prosecution, by this request, asks that it be immediately disclosed to the  
20 prosecution.



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**FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. sec. 872**

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

**PO LONG LEW**

Counts:

- 1 H&S 11153
- 2 H&S 11153
- 3 H&S 11153
- 4 H&S 11153
- 5 H&S 11153
- 6 H&S 11153
- 7 H&S 11153
- 8 H&S 11153
- 9 H&S 11153
- 10 H&S 11153

I order that defendant be held to answer therefor and be admitted to bail in the amount of

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Date of arraignment in Superior Court will be \_\_\_\_\_

in Department \_\_\_\_\_ at \_\_\_\_\_ a.m./p.m.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT