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FILED
Clerk of the Superior Court

ULI 04 2024

By: N. Smith, Clerk
EAST COUNTY DIVISION

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN DIEGO, EAST COUNTY DIVISION
11

12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

14 Plaintiff,

15 v.

16 **HUSAM EDDIN ALDAIRI (DOB**
17 **██████████),**

18 **LAITH AZIZ ALANI (DOB ██████████),**

19 **RAWAA ATTAR (DOB ██████████),**

20 **LILYAN KRIKORIAN (DOB ██████████),**

21 **INCI NARIN (DOB ██████████),**

22 &

23 **FADI FARIS J SHAMMAS (DOB**
24 **██████████),**

25 Defendants.

Case No. CE390 710

FELONY COMPLAINT

AG DOCKET Nos: SD2021303380,
SD2024304159,
SD2024304148,
SD2024304146,
SD2024304143,
SD2024304152

Ct 1: Conspiracy to Commit a Crime P.C.
182(a)(1)

Ct 2: Insurance Fraud. Cal. P.C. §550(a)(5)

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1 **CHARGE SUMMARY**

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<u>Count</u>	<u>Charge</u>	<u>Issue Type</u>	<u>Sentence Range</u>	<u>Special Allegations</u>	<u>Allegation Effect</u>
3 1	PC §182(a)(1)	Felony	2y – 3y – 5y	PC §186.11(a)(2)	2y – 3y – 5y
4 2	PC §550(a)(5)	Felony	2y – 3y – 5y	PC §186.11(a)(2)	2y – 3y – 5y

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6 The People of the State of California hereby allege that in the County of San Diego, State
7 of California, and elsewhere, within the State of California, and before the making of this criminal
8 complaint, the above-named defendants, committed the following different criminal offenses all
9 connected together in their commission, and being two or more different offenses of the same class
10 of crimes or offenses, under separate counts:

11 **COUNT 1**
12 **Penal Code section 182, subdivision (a)(1) - a Felony**
13 **Conspiracy to Commit a Crime (P.C. § 550(a)(5)) - 2, 3, or 5 years**

14 On or about, and between, August 29, 2016 and October 20, 2020, in the county of San
15 Diego, Defendants, HUSAM EDDIN ALDAIRI, LAITH AZIZ ALANI, RAWA ATTAR,
16 LILYAN KRIKORIAN, INCI NARIN, AND FADI FARIS J SHAMMAS, did unlawfully conspire
17 together and with another person and persons whose identities are known and unknown to commit
18 the crime of Healthcare Insurance Fraud, in violation of Code Section 550(a)(5), of the Penal Code,
19 a felony; that pursuant to and for the purposes of carrying out the objectives and purposes of the
20 aforesaid conspiracy, the said conspirators committed the following overt act and acts at and in the
21 County of San Diego:

22 **Overt Act #1**

23
24 On or about May 30, 2018, Defendant, HUSAM EDDIN ALDAIRI signed a letter
25 addressed to Borrego Community Health Foundation requesting to add Defendant, INCI NARIN
26 as a contract dentist at 40/30 Dental for the purpose of seeing Medi-Cal patients associated with
27 Borrego Community Health Foundation. The letter attested ALDAIRI would supervise INCI
28 NARIN and pay NARIN’S salary.

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Overt Act #2

On or about September 5, 2017, text messages were exchanged between Defendants, RAWAA ATTAR and LAITH AZIZ ALANI, discussing ALANI'S prior offer to Defendant, HUSSAM EDIN ALDAIRI train an employee and refusal to come into the office that day.

Overt Act #3

On or about September 5, 2017, text messages were exchanged between Defendants, RAWAA ATTAR and LAITH AZIZ ALANI, discussing ATTAR's approval of Samer's procedures and ALANI's backdating of the billing from September 5, 2017.

Overt Act #4

On or about October 18, 2018, text messages were exchanged between Defendants, RAWAA ATTAR and LAITH AZIZ ALANI, discussing charting completed procedures onto future dates of service, when those dates had not yet occurred.

Overt Act #5

On or about October 18, 2018, Defendant LAITH AZIZ ALANI sent Defendant, RAWAA ATTAR, a text message containing a photograph of a patient chart noting procedures were performed on October 19, 2018, October 22, 2018, and October 23, 2018.

Overt Act #6

On or about April 1, 2019, text messages were exchanged between the Defendants, RAWA ATTAR, and LAITH AZIZ ALANI, in which the calculation of the dentists' production and payment to Dr. Hasan, Dr. Mohamed, Dr. Mustafa, and Defendant, HUSAM EDDIN ALDAIRI for dental services are discussed.

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Overt Act #7

On or about, and between January 1, 2019 and July 31, 2019, Defendant, LAITH AZIZ ALANI trained **Inas Sadeq** on billing and data entry for submission of Medi-Cal claims to Borrego Community Health Foundation.

Overt Act #8

On or about May 20, 2019, text messages were exchanged between Defendants, RAWAA ATTAR, and LAITH AZIZ ALANI, in which they discuss Defendant, FADDI SHAMAS's role in calculation of the dentists' production and billing.

Overt Act #9

On or about May 20, 2019, text messages were exchanged between Defendants, RAWAA ATTAR, and LAITH AZIZ ALANI, in which ATTAR stated "The plan was to trade [sic] him for production and then billing but in any case he needs to be trained for billing Husam wants to transfer him to the other clinic to help Maryam." ALANI responded, "Just tell me when you want the training to start." ATTAR sent a text message directing ALANI to begin training that day. .

Overt Act #10

On or about August 22, 2018, Defendant, RAWAA ATTAR received text messages from **[Natalia] (619) 788-1114** with an image of the August 22, 2018 Day Sheet (Alphabetical) and text, "Let me know if the side note is okay before sending to Dr. already because if not so I can change it." ATTAR responded, "It's good thank you."

Overt Act #11

On or about, and between June 18, 2018 and October 20, 2020 Defendant, LILYIAN KRIKORIAN, sent Defendant, RAWA ATTAR, text messages containing appointment book and day sheet totals used to assist in billing Borrego Community Health Foundation for dental services provided to Medi-Cal patients affiliated with the Federally Qualified Health Center program.

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Overt Act #12

On or about June 18, 2018, Defendant, LILYIAN KRIKORIAN, sent Defendant, RAWA ATTAR, text messages containing appointment book and day sheets for June 18, 2018.

Overt Act #13

On or about December 4, 2018, Defendant, LILYIAN KRIKORIAN, sent Defendant, RAWA ATTAR a text message containing the image of the day sheet for December 4, 2018.

Overt Act #14

On or about January 7, 2019, Defendant, LILYIAN KRIKORIAN, sent Defendant, RAWA ATTAR, text messages containing the day sheet for January 7, 2019.

Overt Act #15

On or about January 17, 2019, Defendant, LILYIAN KRIKORIAN, sent Defendant, RAWA ATTAR, text messages containing the day sheet for January 17, 2019.

Overt Act #16

On or about May 23, 2019, Defendant, LILYIAN KRIKORIAN, sent Defendant, RAWA ATTAR, text messages containing the day sheet for May 23, 2019.

Overt Act #17

On or about July 19, 2019, Defendant, LILYIAN KRIKORIAN sent Defendant, RAWA ATTAR, text messages containing the day sheet for Defendant, HUSAM EDDIN ALDAIRI dated July 19, 2019.

Overt Act #18

On or about and between September 4, 2018 and December 3, 2018, text messages were exchanged between Defendants, RAWA ATTAR, and INCI NARIN, in which NARIN sent

1 ATTAR images describing NARIN's production of dental services for the months of September
2 2018, October 2018, and November 2018. ATTAR sent NARIN messages stating, "Sounds good,"
3 and sent an emoji with the words, "Killin' it!"
4

5 **Overt Act #19**

6 On or about, and between January 2, 2019 and April 30, 2019, text messages were
7 exchanged between Defendants, RAWA ATTAR, and INCI NARIN, in which NARIN sent
8 ATTAR images describing NARIN's production of dental services for the months of December
9 2018, January 2019, February 2019, March 2019, and April 2019. ATTAR sent NARIN messages
10 stating, "Thank you great job as usual," and "Thank you."
11

12 **Overt Act #20**

13 On or about, and between June 3, 2019 and August 12, 2019, Defendant, INCI NARIN,
14 sent Defendant, RAWAA ATTAR, text messages of images describing NARIN's production of
15 dental services for the months of May 2019 and July 2019.
16

17 **Overt Act #21**

18 On or about September 3, 2019, text messages were exchanged between Defendants,
19 RAWA ATTAR, and INCI NARIN, in which NARIN sent ATTAR images describing NARIN's
20 production of dental services for the month of August 2019. ATTAR sent NARIN text messages
21 stating, "I will bring your check tomorrow morning," and "Thank you."
22

23 **Overt Act #22**

24 On or about, and between November 1, 2019, text messages were exchanged Defendants,
25 RAWA ATTAR, and INCI NARIN, in which NARIN sent ATTAR an image describing NARIN's
26 production of dental services for the month of October 2019. ATTAR sent NARIN a text message
27 stating, "Thank you Dr. great job I am not working today can I bring you the check on Monday."
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Overt Act #23

On or about December 2, 2019, text messages were exchanged between Defendants, RAWA ATTAR, INCI NARIN, in which NARIN sent ATTAR images describing NARIN's production of dental services for the month of November 2019.

Overt Act #24

On or about January 22, 2019, Defendants, FADI FARIS J SHAMMAS, and RAWA ATTAR, exchanged text messaged in which they discussed SHAMMAS's completion of the calculation of the 40/30 Clinic dentists' production for the purposes of billing Borrego Community Health Center for dental services dated January 22, 2019.

Overt Act #25

On or about January 29, 2019, Defendant FADI FARIS J SHAMMAS, sent Defendant, RAWA ATTAR, a text message outlining SHAMMAS's calculation of the 40/30 Clinic dentists' production for the purposes of billing Borrego Community Health Center for dental services dated January 29, 2019.

Overt Act #26

On or about April 4, 2019, Defendant FADI FARIS J SHAMMAS, sent Defendant, RAWA ATTAR, a text message outlining SHAMMAS's calculation of the 40/30 Clinic dentists' production for the purposes of billing Borrego Community Health Center for dental services dated April 4, 2019.

Overt Act #27

On or about April 8, 2019, Defendant FADI FARIS J SHAMMAS, sent Defendant, RAWA ATTAR, a text message outlining SHAMMAS's calculation of the 40/30 Clinic dentists' production for the purposes of billing Borrego Community Health Center for dental services dated April 8, 2019.

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Overt Act #28

On or about, and between January 4, 2018 and July 13, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$10,316.68 based upon services 40/30 Dental claimed to have provided to **Intissar Ahmad**.

Overt Act #29

On or about, and between November 19, 2018 and July 1, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$12,380.92 based upon services 40/30 Dental claimed to have provided to **Basel Al Darkazali**.

Overt Act #30

On or about, and between October 15, 2018 and January 21, 2020 the California Department of Healthcare Services paid Borrego Community Health Foundation \$13,195.72 based upon based upon services 40/30 Dental claimed to have provided to **Najeeb Al Moshi**.

Overt Act #31

On or about, and between January 22, 2018 and August 31, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$7,122.82 based upon services 40/30 Dental claimed to have provided to **Ali Saced Al Najjar**.

Overt Act #32

On or about, and between October 8, 2018 and August 19, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$19,146.83 based upon services 40/30 Dental claimed to have provided to **Fawaz Al Smadi**.

Overt Act #33

On or about, and between September 25, 2017 and August 24, 2020 the California Department of Healthcare Services paid Borrego Community Health Foundation \$24,810.90 based

1 upon services 40/30 Dental claimed to have provided to **Thaer Alameri**.

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3 **Overt Act #34**

4 On or about, and between July 1, 2019 and September 28, 2020, the California Department
5 of Healthcare Services paid Borrego Community Health Foundation \$3,704.10 based upon services
6 40/30 Dental claimed to have provided to **Mariam Alaso**.

7
8 **Overt Act #35**

9 On or about, and between September 5, 2017 and November 12, 2019, the California
10 Department of Healthcare Services paid Borrego Community Health Foundation \$24,810.90 based
11 upon services 40/30 Dental claimed to have provided to **Floreed Alaso**.

12
13 **Overt Act #36**

14 On or about, and between July 23, 2018 and August 31, 2020, the California Department of
15 Healthcare Services paid Borrego Community Health Foundation \$10,59.32 based upon services
16 40/30 Dental claimed to have provided to **Sarah Alewi**.

17
18 **Overt Act #37**

19 On or about, and between October 1, 2018 and February 19, 2019, the California
20 Department of Healthcare Services paid Borrego Community Health Foundation \$7,868.55 based
21 upon services 40/30 Dental claimed to have provided to **Bassam Ali**.

22
23 **Overt Act #38**

24 On or about, and between December 3, 2018 and October 14, 2019 the California
25 Department of Healthcare Services paid Borrego Community Health Foundation \$9,970.96 based
26 upon services 40/30 Dental claimed to have provided to **Tania Alkass Tobiya**.

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Overt Act #39

On or about, and between January 8, 2018 and March 9, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$9,741.79 based upon services 40/30 Dental claimed to have provided to **Khaled Almahamid**.

Overt Act #40

On or about, and between February 27, 2017 and October 12, 2020, , the California Department of Healthcare Services paid Borrego Community Health Foundation \$18,717.57 based upon services 40/30 Dental claimed to have provided to **Sarmad Aloka**.

Overt Act #41

On or about, and between February 11, 2019 and July 27, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$16,314.95 based upon services 40/30 Dental claimed to have provided to **Majid Al-Qas**.

Overt Act #42

On or about, and between April 16, 2018 and September 21, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$12,953.52 based upon services 40/30 Dental claimed to have provided to **Azhar Alsaberi**.

Overt Act #43

On or about, and between May 20, 2019 and January 27, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$10,315.75 based upon services 40/30 Dental claimed to have provided to **Aamela Alsukari**.

Overt Act #44

On or about, and between May 8, 2018 and July 28, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$6,571.10 based upon services

1 40/30 Dental claimed to have provided to **Yousif Alsulaiman**.

2
3 **Overt Act #45**

4 On or about, and between May 6, 2019 and February 7, 2020, the California Department of
5 Healthcare Services paid Borrego Community Health Foundation \$12,729.35 for claims for dental
6 services to **Mohammad Aman**.

7
8 **Overt Act #46**

9 On or about, and between August 12, 2019, and September 21, 2020, the California
10 Department of Healthcare Services paid Borrego Community Health Foundation \$5,309.02 based
11 upon services 40/30 Dental claimed to have provided to **Hayder Amanah**.

12
13 **Overt Act #47**

14 On or about, and between July 27, 2020 and September 21, 2020, the California Department
15 of Healthcare Services paid Borrego Community Health Foundation \$7,463.42 based upon services
16 40/30 Dental claimed to have provided to **Nazar Aoudesh**.

17
18 **Overt Act #48**

19 On or about, and between August 5, 2019 and September 14, 2020, the California
20 Department of Healthcare Services paid Borrego Community Health Foundation \$24,911.19 based
21 upon services 40/30 Dental claimed to have provided to **Najeh Awad**.

22
23 **Overt Act #49**

24 On or about, and between October 30 2017 and April 15, 2019, the California Department
25 of Healthcare Services paid Borrego Community Health Foundation \$17,575.13 based upon
26 services 40/30 Dental claimed to have provided to **Fatimeh Azeez**.

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Overt Act #50

On or about, and between May 20, 2019 and February 24, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$9,720.31 based upon services 40/30 Dental claimed to have provided to **Nadia Bakir**.

Overt Act #51

On or about, and between March 27, 2017 and April 13, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$14,584.39 based upon services 40/30 Dental claimed to have provided to **Imad Bataq**.

Overt Act #52

On or about, and between November 27, 2017 and September 14, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$23,296.39 based upon services 40/30 Dental claimed to have provided to **Sarmad Behnam**.

Overt Act #53

On or about, and between February 11, 2019 and September 28, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$10,327.57 based upon services 40/30 Dental claimed to have provided to **Fouad Chokier**.

Overt Act #54

On or about, and between February 10, 2020 and September 28, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$13,875.16 based upon services 40/30 Dental claimed to have provided to **Suha Darwish**.

Overt Act #55

On or about, and between July 2, 2018 and September 3, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$5,993.51 based upon services

1 40/30 Dental claimed to have provided to **Sarmad Dawood (DOB 3/13/1989)**.

2
3 **Overt Act #56**

4 On or about, and between October 15, 2018 and January 27, 2020 the California Department
5 of Healthcare Services paid Borrego Community Health Foundation \$5,851.42 based upon services
6 40/30 Dental claimed to have provided to **Sarmad Dawood (DOB 9/17/1998)**.

7
8 **Overt Act #57**

9 On or about, and between September 19, 2016 and September 26, 2016, the California
10 Department of Healthcare Services paid Borrego Community Health Foundation \$1,520.40 based
11 upon services 40/30 Dental claimed to have provided to **Natalie Deeb**.

12
13 **Overt Act #58**

14 On or about, and between May 29, 2018 and August 17, 2020, the California Department
15 of Healthcare Services paid Borrego Community Health Foundation \$6,313.08 based upon services
16 40/30 Dental claimed to have provided to **Rimon Eshaq**.

17
18 **Overt Act #59**

19 On or about, and between March 25, 2019 and April 8, 2019, the California Department of
20 Healthcare Services paid Borrego Community Health Foundation \$3,023.24 based upon services
21 40/30 Dental claimed to have provided to **Shamel Esho**.

22
23 **Overt Act #60**

24 On or about, and between July 2, 2018 and July 27, 2020, the California Department of
25 Healthcare Services paid Borrego Community Health Foundation \$22,593.31 based upon services
26 40/30 Dental claimed to have provided to **Waad Eshoo**.

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Overt Act #61

On or about, and between March 18, 2019 and July 20, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$7,945.80 based upon services 40/30 Dental claimed to have provided to **Atheer Essa**.

Overt Act #62

On or about, and between November 13, 2018 and July 26, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$15,255.50 based upon services 40/30 Dental claimed to have provided to **Isam Essa**.

Overt Act #63

On or about, and between February 11, 2019 and April 15, 2019 the California Department of Healthcare Services paid Borrego Community Health Foundation \$4,477.01 based upon services 40/30 Dental claimed to have provided to **Noor Faisal**.

Overt Act #64

On or about, and between April 16, 2018 and September 14, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$19,859.35 based upon services 40/30 Dental claimed to have provided to **Fadi Faraj**.

Overt Act #65

On or about, and between May 13, 2019 and May 4, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$8,357.61 based upon services 40/30 Dental claimed to have provided to **Amar Francis**.

Overt Act #66

On or about and between, January 30, 2017 and July 27, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$19,859.35 based upon

1 services 40/30 Dental claimed to have provided to **Basil Gardy**.

2
3 **Overt Act #67**

4 On or about, and between October 14, 2019 and November 18, 2019, the California
5 Department of Healthcare Services paid Borrego Community Health Foundation \$5,510.93 based
6 upon services 40/30 Dental claimed to have provided to **Latif Georges**.

7
8 **Overt Act #68**

9 On or about, and between May 30, 2017 and May 28, 2019, the California Department of
10 Healthcare Services paid Borrego Community Health Foundation \$14,074.66 based upon services
11 40/30 Dental claimed to have provided to **Husam Ghanim**.

12
13 **Overt Act #69**

14 On or about, and between October 8, 2018 and April 6, 2020, the California Department of
15 Healthcare Services paid Borrego Community Health Foundation \$15,052.64 based upon services
16 40/30 Dental claimed to have provided to **Majida Ghazi**.

17
18 **Overt Act #70**

19 On or about, and between March 23, 2020 and October 12, 2020, the California Department
20 of Healthcare Services paid Borrego Community Health Foundation \$14,408.82 based upon
21 services 40/30 Dental claimed to have provided to **James Godwin**.

22
23 **Overt Act #71**

24 On or about, and between January 30, 2017 and January 29, 2019, the California
25 Department of Healthcare Services paid Borrego Community Health Foundation \$22,329.89 based
26 upon services 40/30 Dental claimed to have provided to **Hanaa Gorgis**.

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Overt Act #72

On or about, and between May 13, 2019 and July 20, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$10,817.89 based upon services 40/30 Dental claimed to have provided to **Talal Hamid**.

Overt Act #73

On or about, and between June 3, 2019 and May 11, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$6,858.78 based upon services 40/30 Dental claimed to have provided to **Ghanim Hana**.

Overt Act #74

On or about, and between December 31, 2018 and August 31, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$20,360.73 based upon services 40/30 Dental claimed to have provided to **Manal Hanti**.

Overt Act #75

On or about, and between December 16, 2019 and June 29, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$10,618.88 based upon services 40/30 Dental claimed to have provided to **Wisam Harvey**.

Overt Act #76

On or about, and between November 19, 2018 and April 2, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$14,466.00 based upon services 40/30 Dental claimed to have provided to **Mohamad Hawyek**.

Overt Act #77

On or about, and between September 17, 2018 and August 26, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$15,764.71 based

1 upon services 40/30 Dental claimed to have provided to **Jinan Hirmiz**.

2
3 **Overt Act #78**

4 On or about, and between December 3, 2018 and April 15, 2019, the California Department
5 of Healthcare Services paid Borrego Community Health Foundation \$6,054.36 based upon services
6 40/30 Dental claimed to have provided to **Samual Hovseb**.

7
8 **Overt Act #79**

9 On or about, and between December 10, 2018 and September 9, 2019, the California
10 Department of Healthcare Services paid Borrego Community Health Foundation \$20,768.62 based
11 upon services 40/30 Dental claimed to have provided to **Rafik Ibrahim**.

12
13 **Overt Act #80**

14 On or about, and between March 4, 2019 and September 14, 2020, the California
15 Department of Healthcare Services paid Borrego Community Health Foundation \$9,934.01 based
16 upon services 40/30 Dental claimed to have provided to **Sabriya Ioraha**.

17
18 **Overt Act #81**

19 On or about, and between July 3, 2017 and July 27, 2020, the California Department of
20 Healthcare Services paid Borrego Community Health Foundation \$18,106.58 based upon services
21 40/30 Dental claimed to have provided to **Ikhlas Iskandar**.

22
23 **Overt Act #82**

24 On or about, and between February 11, 2019 and October 5, 2020, the California
25 Department of Healthcare Services paid Borrego Community Health Foundation \$8,483.40 based
26 upon services 40/30 Dental claimed to have provided to **Hadeel Jammoua**.

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Overt Act #83

On or about, and between February 4, 2019 and March 30, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$14,247.59 based upon services 40/30 Dental claimed to have provided to **Jamila Kaihan**.

Overt Act #84

On or about, and between October 23, 2017 and August 24, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$15,392.08 based upon services 40/30 Dental claimed to have provided to **Khalid Kakouz**.

Overt Act #85

On or about, and between February 10, 2020 and September 21, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$19,478.59 based upon services 40/30 Dental claimed to have provided to **Erica Kartas**.

Overt Act #86

On or about July 24, 2017, 40/30 the California Department of Healthcare Services paid Borrego Community Health Foundation \$6,4441.16 based upon services 40/30 Dental claimed to have provided to **Anas Kassouha**.

Overt Act #87

On or about, and between March 11, 2019 and November 25, 2019, 40/30 Dental received payments from Borrego Community Health Foundation totaling \$4,787.06 based upon services 40/30 Dental claimed to have provided to **Mohaned Khora Hrmez**.

Overt Act #88

On or about, and between March 13, 2017 and April 27, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$12,008.97 based upon

1 services 40/30 Dental claimed to have provided to **Murad Khourshid**.

2
3 **Overt Act #89**

4 On or about, and between February 11, 2019 and February 3, 2020, the California
5 Department of Healthcare Services paid Borrego Community Health Foundation \$13,873.99 based
6 upon services 40/30 Dental claimed to have provided to **Amira Kuza**.

7
8 **Overt Act #90**

9 On or about, and between August 12, 2019 and October 19, 2020, the California Department
10 of Healthcare Services paid Borrego Community Health Foundation \$11,991.60 based upon
11 services 40/30 Dental claimed to have provided to **Intisar Mahdi**.

12
13 **Overt Act #91**

14 On or about, and between February 27, 2017 and July 27, 2020, the California Department
15 of Healthcare Services paid Borrego Community Health Foundation \$17,665.37 based upon
16 services 40/30 Dental claimed to have provided to **Ahmad Mahmoud**.

17
18 **Overt Act #92**

19 On or about, and between March 16, 2020 and September 28, 2020, the California
20 Department of Healthcare Services paid Borrego Community Health Foundation \$16,810.29 based
21 upon services 40/30 Dental claimed to have provided to **Mark Malan**.

22
23 **Overt Act #93**

24 On or about, and between July 8, 2019 and February 10, 2020, the California Department
25 of Healthcare Services paid Borrego Community Health Foundation \$4,759.60 for claims for dental
26 services to **Fady Malko**.

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Overt Act #94

On or about, and between April 27, 2020 and June 8, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$5,603.43 based upon services 40/30 Dental claimed to have provided to **Waad Malo**.

Overt Act #95

On or about, and between February 11, 2019 and October 19, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$14,702.54 based upon services 40/30 Dental claimed to have provided to **Suad Mansour**.

Overt Act #96

On or about, and between June 5, 2017 and August 31, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$16,810.29 based upon services 40/30 Dental claimed to have provided to **Robert Mansour**.

Overt Act #97

On or about, and between September 9, 2018 and September 18, 2019 the California Department of Healthcare Services paid Borrego Community Health Foundation \$16,965.98 based upon services 40/30 Dental claimed to have provided to **Bassam Matar**.

Overt Act #98

On or about, and between June 10, 2019 and December 2, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$12,225.92 based upon services 40/30 Dental claimed to have provided to **Fakhri Matti**.

Overt Act #99

On or about, and between December 24, 2018 t and o October 5, 2020, the California Department of Healthcare Services paid Borreg@Community Health Foundation \$15,618.07 based

1 upon services 40/30 Dental claimed to have provided to **Kameran Matti**.

2
3 **Overt Act #100**

4 On or about, and between March 4, 2019 and January 13, 2020, the California Department
5 of Healthcare Services paid Borrego Community Health Foundation \$9,584.36 based upon services
6 40/30 Dental claimed to have provided to **Azad Mikhael**.

7
8 **Overt Act #101**

9 On or about, and between November 18, 2019 and September 28, 2020, the California
10 Department of Healthcare Services paid Borrego Community Health Foundation \$14,727,28 based
11 upon services 40/30 Dental claimed to have provided to **Shant Milkonyan**.

12
13 **Overt Act #102**

14 On or about, and between December 2, 2019 and June 29, 2020 the California Department
15 of Healthcare Services paid Borrego Community Health Foundation \$16,810.29 based upon
16 services 40/30 Dental claimed to have provided to **Amena Mokhlis**.

17
18 **Overt Act #103**

19 On or about, and between November 26, 2018 and May 11, 2020, the California Department
20 of Healthcare Services paid Borrego Community Health Foundation \$5,934.73 based upon services
21 40/30 Dental claimed to have provided to **Dani Moshi**.

22
23 **Overt Act #104**

24 On or about, and between August 3, 2020 and August 17, 2020 the California Department
25 of Healthcare Services paid Borrego Community Health Foundation \$6,081.93 based upon services
26 40/30 Dental claimed to have provided to **Yousef Walid Mubarak Alawad**.

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Overt Act #105

On or about, and between February 25, 2019 and October 12, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$10,930.31 based upon services 40/30 Dental claimed to have provided to **Laila Mudhafar**.

Overt Act #106

On or about, and between January 22, 2018 and July 1, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$21,296.10 based upon services 40/30 Dental claimed to have provided to **Sabah Mushey**.

Overt Act #107

On or about, and between April 15, 2019 and July 20, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$10,629.28 based upon services 40/30 Dental claimed to have provided to **Sahira Mynak**.

Overt Act #108

On or about, and between December 31, 2018 and December 23, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$11,586.86 based upon services 40/30 Dental claimed to have provided to **Marko Oraha**.

Overt Act #109

On or about, and between March 2, 2020 and August 10, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$8,983.79 for based upon services 40/30 Dental claimed to have provided to **Thamer Osman**.

Overt Act #110

On or about, and between January 8, 2018 and July 27, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$15,087.88 based upon services

1 40/30 Dental claimed to have provided to **Robert Petras**.

2
3 **Overt Act #111**

4 On or about, and between January 22, 2019 and July 29, 2019, the California Department
5 of Healthcare Services paid Borrego Community Health Foundation \$18,673.07 based upon
6 services 40/30 Dental claimed to have provided to **Samen Rahimi**.

7
8 **Overt Act #112**

9 On or about, and between October 8, 2018 and October 5, 2020, the California Department
10 of Healthcare Services paid Borrego Community Health Foundation \$20,972.88 based upon
11 services 40/30 Dental claimed to have provided to **Samar Sabbagha**.

12
13 **Overt Act #113**

14 On or about, and between February 6, 2017 and May 4, 2020 the California Department of
15 Healthcare Services paid Borrego Community Health Foundation \$18,102.88 based upon services
16 40/30 Dental claimed to have provided to **Bassem Sadek**.

17
18 **Overt Act #114**

19 On or about, and between March 25, 2019 and July 1, 2019 the California Department of
20 Healthcare Services paid Borrego Community Health Foundation \$7,623.81 based upon services
21 40/30 Dental claimed to have provided to **Issam Sadik**.

22
23 **Overt Act #115**

24 On or about, May 18, 2020, the California Department of Healthcare Services paid Borrego
25 Community Health Foundation \$13,345.80 based upon services 40/30 Dental claimed to have
26 provided to **Sonia Saka**.

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Overt Act #116

On or about, and between March 4, 2019 and April 29, 2019 the California Department of Healthcare Services paid Borrego Community Health Foundation \$6,835.14 based upon services 40/30 Dental claimed to have provided to **Salah Mahdi Salih**.

Overt Act #117

On or about, and between August 3, 2020 and July 27, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$12,274.18 based upon services 40/30 Dental claimed to have provided to **Mohammad Satter**.

Overt Act #118

On or about, and between February 20, 2018 and August 31, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$17,338.17 based upon services 40/30 Dental claimed to have provided to **Rajo Shaaya**.

Overt Act #119

On or about, and between December 11, 2017 and August 5, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$24,762.57 based upon services 40/30 Dental claimed to have provided to **Raida Shamon**.

Overt Act #120

On or about, and between August 29, 2016 and September 14, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$4,712.96. based upon services 40/30 Dental claimed to have provided to **Alaa Shareef**.

Overt Act #121

On or about, and between February 19, 2019 and October 19, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$14,428.14 based

1 upon services 40/30 Dental claimed to have provided to **Saeed Sheebo**.

2
3 **Overt Act #122**

4 On or about, and between November 26, 2018 and October 5, 2020, the California
5 Department of Healthcare Services paid Borrego Community Health Foundation \$16,540.95 based
6 upon services 40/30 Dental claimed to have provided to **Ali Shehadeh**.

7
8 **Overt Act #123**

9 On or about, and between April 22, 2019 and September 9, 2019, the California Department
10 of Healthcare Services paid Borrego Community Health Foundation \$8,153.53 based upon services
11 40/30 Dental claimed to have provided to **Jamila Warda**.

12
13 **Overt Act #124**

14 On or about, and between January 6, 2020 and August 31, 2020, the California Department
15 of Healthcare Services paid Borrego Community Health Foundation \$14,942.48 based upon
16 services 40/30 Dental claimed to have provided to **Bakhmala Wazir**.

17
18 **Overt Act #125**

19 On or about, and between December 2, 2019 and October 12, 2020, the California
20 Department of Healthcare Services paid Borrego Community Health Foundation \$8,805.39 based
21 upon services 40/30 Dental claimed to have provided to **Ayad Yassin**.

22
23 **Overt Act #126**

24 On or about, and between December 23, 2019 and February 3, 2020, the California
25 Department of Healthcare Services paid Borrego Community Health Foundation \$4,269.28 based
26 upon services 40/30 Dental claimed to have provided to **Rima Abdo Yonan**.

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Overt Act #127

On or about, and between December 11, 2017 and July 27, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$14,325.55 for claims for dental services to **Muntaha Youhanna**.

Overt Act #128

On or about, and between March 4, 2019 and April 2, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$4,458.24 based upon services 40/30 Dental claimed to have provided to **Parsya Younan**.

Overt Act #129

On or about, and between April 22, 2019 and April 6, 2020, the California Department of Healthcare Services paid Borrego Community Health Foundation \$8,486.09 based upon services 40/30 Dental claimed to have provided to **Noora Yousef**.

Overt Act #130

On or about, and between June 5, 2017 and April 8, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$15,084.64 based upon services 40/30 Dental claimed to have provided to **Lena Yousef**.

Overt Act #131

On or about, and between February 11, 2019 and May 20, 2019 the California Department of Healthcare Services paid Borrego Community Health Foundation \$5,784.20 based upon services 40/30 Dental claimed to have provided to **Lina Yousif**.

Overt Act #132

On or about, and between July 1, 2019 and November 4, 2019, the California Department of Healthcare Services paid Borrego Community Health Foundation \$5,130.31 based upon services

1 40/30 Dental claimed to have provided to **Manir Yousif**.

2
3 **Overt Act #133**

4 On or about, and between April 8, 2019 and October 12, 2020, the California Department
5 of Healthcare Services paid Borrego Community Health Foundation \$10,859.77 based upon
6 services 40/30 Dental claimed to have provided to **Naseer Yousif**.

7
8 **Overt Act #134**

9 On or about, and between September 8, 2020 and October 12, 2020, the California
10 Department of Healthcare Services paid Borrego Community Health Foundation \$17,280.91 based
11 upon services 40/30 Dental claimed to have provided to **Zouhair Yousif**.

12 **COUNT 2**

13 **Penal Code section 550, subdivision (a)(5) - a Felony**
14 **Healthcare Insurance Fraud- 2, 3, or 5 years**

15 On or about, and between, July 22, 2016 and October 6, 2020, defendants HUSAM EDDIN
16 ALDAIRI, LAITH AZIZ ALANI, RAWA ATTAR, LILYAN KRIKORIAN, INCI NARIN, and
17 FADI FARIS J SHAMMAS, did knowingly prepare, make, or subscribe a document, with the intent
18 to present and use it, and to allow it to be presented in support of false and fraudulent claims, in
19 violation of Penal Code section 550, subdivision (a)(5), a felony.

20 **SPECIAL ALLEGATION**

21 **Aggravated White Collar Enhancement – Penal Code § 186.11(a)(2)**
22 **2, 3, or 5 years**

23 It is further alleged, pursuant to Penal Code Section 186.11(a), that the offenses set forth in
24 Counts 1 and 2 are related felonies, a material element of which is fraud and embezzlement, which
25 involve a pattern of related felony conduct, and the pattern of related felony conduct involves the
26 taking of, or loss by another person or entity of, more than Five Hundred Thousand Dollars
27 (\$500,000).

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SPECIAL ALLEGATION

Circumstance in Aggravation – California Rule of Court § 4.421(a)(3)

It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(9), that the offenses set forth in Counts 1 and 2, that the victims/patients were particularly vulnerable, within the meaning of California Rules of Court, rule 4.421(a)(3).

SPECIAL ALLEGATION

Circumstance in Aggravation – California Rules of Court, Rule 4.421(a)(4)

It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(4), that the offenses set forth in Counts 1 and 2, that the defendants induced others to participate in the commission of the crimes or occupied a position of leadership or dominance of other participants in their commission, within the meaning of California Rules of Court, rule 4.421(a)(4).

SPECIAL ALLEGATION

Circumstance in Aggravation – California Rule of Court § 4.421(a)(8)

It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(8), that the offenses set forth in Counts 1 and 2, that the manner in which the crimes were carried out indicates planning, sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421(a)(8).

SPECIAL ALLEGATION

Circumstance in Aggravation – California Rule of Court § 4.421(a)(9)

It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(9), that the offenses set forth in Counts 1 and 2, that the crimes involved an attempted or actual taking or damage of great monetary value, within the meaning of California Rules of Court, rule 4.421(a)(9).

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1 **SPECIAL ALLEGATION**

2 **Circumstance in Aggravation – California Rule of Court § 4.421(a)(11)**

3 It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(11), that the
4 offenses set forth in Counts 1 and 2, that the defendants took advantage of a position of trust or
5 confidence to commit the offense, within the meaning of California Rules of Court, rule
6 4.421(a)(11).

7
8 I declare under penalty of perjury, on information and belief, pursuant to the laws of the
9 State of California, that the foregoing is true and correct.

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11
12 Dated: October 3, 2024

Respectfully Submitted,

13 ROB BONTA
14 Attorney General of California

15 

16 BIANCA YIP
17 Deputy Attorney General
18 Declarant
19 *Attorneys for the People of the State of
20 California*

21 CA DOJ Docket Nos. SD2021303380, SD2024304159,
22 SD2024304148, SD2024304146,
23 SD2024304143, SD2024304152.

24 **Restitution Claimed**

25 None

26 \$847,713.81

27 To Be Determined

1 **REQUEST FOR DISCOVERY**

2 Pursuant to Penal Code section 1054.5, subdivision (b), the People request from defendant
3 and defense counsel all materials and information required to be disclosed to the prosecution by the
4 defense 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
6 defendants intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a)].

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

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

11 4. Any reports or statements of experts made in connection with the case. [Pen. Code
12 § 1054.3, subd. (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. [Pen. Code § 1054.3,
15 subd. (a)].

16 6. Any real evidence which the defendant intends to offer in evidence at the trial. [Pen.
17 Code § 1054.3, subd. (a)].

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.