I				
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9	Attorneys for the People of the State of Californ			
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11	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
12	COUNTY OF SAN DIEG	O, CENTRAL DIVISION		
13				
14	PEOPLE OF THE STATE OF	Case NoCD307675		
15	CALIFORNIA,	AG Case No. SD2018103634		
16	Plaintiff,	11.5 5.65 1.61 5.5.20 10.10 5.05 1		
17	* *************************************			
18	ν.	FELONY COMPLAINT		
19				
20	GHADA KASSAB (
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22	Defendant.			
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24	The People of the State of California hereby allege that in the County of San Diego, and			
25	elsewhere within the State of California, before the drafting of this criminal complaint, the above-			
26	named defendant, GHADA KASSAB (DOB: committed the following criminal			
27	offenses, all connected together in their commission yet constituting separate criminal offenses:			
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	PEOPLE V. KASSAB FELONY C	COMPLAINT AG CASE NO. SD2018103634		

COUNT 1		
Penal Code § 550(a)(5) - Felony		
Healthcare Insurance Fraud -2, 3, or 5 years		
On or about and between, April 1, 2020 and June 27, 2022, defendant GHADA-KASSAB-		
did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or		
allow them to be presented, in support of false and fraudulent claims for payment involving D.		
Green, Medicare, and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550,		
subdivision (a)(5), a felony.		
COUNT 2 Penal Code § 550(a)(5) – Felony Hoolthoore Incompany 2, 2, 2, 5		
Healthcare Insurance Fraud – 2, 3, or 5 years		
On or about and between, August 22, 2019 and May 26, 2021, defendant GHADA		
KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use		
them, or allow them to be presented, in support of false and fraudulent claims for payment		
involving J. Manager and the Medi-Cal Healthcare Insurer, in violation of Penal Code section		
550, subdivision (a)(5), a felony.		
COUNT 3 Penal Code § 550(a)(5) – Felony		
Healthcare Insurance Fraud – 2, 3, or 5 years		
On or about and between December 11, 2019 and August 27, 2021, defendant CITADA		
On or about and between, December 11, 2018 and August 27, 2021, defendant GHADA		
KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use		
them, or allow them to be presented, in support of false and fraudulent claims for payment		
involving J. I and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550,		
subdivision (a)(5), a felony.		
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PEOPLE V. KASSAB FELONY COMPLAINT AG CASE NO. SD2018103634		

COUNT 4

Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, November 13, 2019 and July 27, 2021, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving M. V and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 5 Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, January 2, 2018 and November 29, 2021, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving A. Command the Medi-Cal Healthcare Insurers, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 6 Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, August 12, 2020 and March 9, 2022, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving E. B. Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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1	COUNT 7	
2	Penal Code § 550(a)(5) — Felony Healthcare Insurance Fraud – 2, 3, or 5 years	
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4	On or about and between, September 14, 2017 and November 29, 2021, defendant GHADA	
5	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use	
6	them, or allow them to be presented, in support of false and fraudulent claims for payment	
7	involving F. A Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code	
8	section 550, subdivision (a)(5), a felony.	
9	COUNT 8	
10	Penal Code § 550(a)(5) – Felony	
11	Healthcare Insurance Fraud – 2, 3, or 5 years	
12	On or about and between, October 30, 2018 and January 11, 2022, defendant GHADA	
13	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use	
14	them, or allow them to be presented, in support of false and fraudulent claims for payment	
15	involving F. Bo Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code	
.16	section 550, subdivision (a)(5), a felony.	
17	COUNT 9	
18	Penal Code § 550(a)(5) – Felony	
19	Healthcare Insurance Fraud – 2, 3, or 5 years	
20	On or about and between, October 9, 2018 and August 16, 2021, defendant GHADA	
21	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use	
22	them, or allow them to be presented, in support of false and fraudulent claims for payment	
23	involving J. C and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550,	
24	subdivision (a)(5), a felony.	
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COUNT 10

Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, September 18, 2017 and May 20, 2022, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving J. W Medicare and the Medi-Cal Healthcare Insurers, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 11 Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, January 19, 2017 and November 1, 2021, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving R. E and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 12

Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about, between, July 25, 2018 and July 14, 2021, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving R. and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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1	COUNT 13	
2	Penal Code § $550(a)(5)$ – Felony Healthcare Insurance Fraud – 2, 3, or 5 years	
3	On or about and between, August 22, 2019 and June 1, 2022, defendant GHADA KASSAB	
4	did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or	
5	allow them to be presented, in support of false and fraudulent claims for payment involving S. A	
б	Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550,	
7	subdivision (a)(5), a felony.	
8	COUNT 14	
9	Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years	
11	On or about and between, September 5, 2019 and May 11, 2022, defendant GHADA	
12	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use	
13	them, or allow them to be presented, in support of false and fraudulent claims for payment	
14	involving S. S., Medicare, and the Medi-Cal Healthcare Insurer, in violation of Penal	
15	Code section 550, subdivision (a)(5), a felony.	
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17 18	<u>COUNT 15</u> Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years	
19	On or about and between, December 2, 2020 and November 17, 2021, defendant GHADA	
20	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use	
21	them, or allow them to be presented, in support of false and fraudulent claims for payment	
22	involving J. A and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550,	
23	subdivision (a)(5), a felony.	
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1	COUNT 16		
2	Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years		
3	On or about and between, December 6, 2016 and August 18, 2021, defendant GHADA		
4	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use		
5	them, or allow them to be presented, in support of false and fraudulent claims for payment		
6	involving C. E and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550,		
7	subdivision (a)(5), a felony.		
8	COUNT 17		
9	Penal Code § 550(a)(5) - Felony		
10	Healthcare Insurance Fraud – 2, 3, or 5 years		
11	On or about and between, January 10, 2017 and November 3, 2021, defendant GHADA		
12	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use		
13	them, or allow them to be presented, in support of false and fraudulent claims for payment		
14	involving M. Na and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550,		
15	subdivision (a)(5), a felony.		
16	COUNT 18		
17	Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years		
18	2, 5, or 5 years		
19	On or about and between, March 27, 2018 and September 20, 2021, defendant GHADA		
20	KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use		
21	them, or allow them to be presented, in support of false and fraudulent claims for payment		
22	involving A. S and the Medi-Cal Healthcare Insurers, in violation of Penal Code section 550,		
23	subdivision (a)(5), a felony.		
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FELONY COMPLAINT

AG CASE NO. SD2018103634

PEOPLE V. KASSAB

COUNT 19

Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, October 3, 2017 and September 20, 2021, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving V. Let and the Medi-Cal Healthcare Insurers, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 20 Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, March 24, 2020 and September 20, 2021, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving E. I and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 21 Penal Code § 550(a)(5) – Felony Healthcare Insurance Fraud – 2, 3, or 5 years

On or about and between, March 24, 2020 and September 20, 2021, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving J. Parameter and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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COUNT 22

Penal Code § 550(a)(5) - Felony Healthcare Insurance Fraud -2, 3, or 5 years

On or about, between, January 1, 2017 and December 4, 2024, defendant GHADA KASSAB did knowingly prepare, make, or subscribe writings, with the intent to present and use them, or allow them to be presented, in support of false and fraudulent claims for payment involving patients of Dr. Ghada Kassab (which are different from and in addition to the patients related to Counts 1 through 21), Medicare and Medi-Cal Healthcare Insurers, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 23

Welfare and Institutions Code Section 14107(b)(1) -a Felony Presenting False Medi-Cal Claims - 2, 3, or 5 years

On or about, and between, October 20, 2016 and December 4, 2024, within the County of San Diego, defendant GHADA KASSAB, with intent to defraud, presented and caused to be presented, for allowance and payment, false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, false and fraudulent billing, patient documents and records, in violation of section 14107(b)(1) of the Welfare and Institutions Code, a felony.

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SPECIAL ALLEGATION #1

Penal Code § 186.11(a)(1), (a)(2)

White Collar Crime Enhancement - Loss Over \$500,000 Additional 2, 3, or 5 years State Prison

It is further alleged that the crimes committed by defendant GHADA KASSAB in Counts 1 through 23 are related felonies, a material element of which is fraud and/or embezzlement, which involved a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss by, the State of California and the Medi-Cal Healthcare Insurer of more than five hundred thousand dollars (\$500,000), within the meaning of Penal Code section 186.11(a)(2).

NOTICE: Pursuant to Penal code section 1170(h), prison custody time is to be served in state prison if the enhancement pursuant to Penal Code section 186.11 is imposed as part of a sentence for the above offense.

SPECIAL ALLEGATION #2

Penal Code § 1203.045(a) Theft Exceeding \$100,000 – Probation Limitation

It is further alleged that the theft committed by defendant GHADA KASSAB, charged in Counts 1 through 23, resulted in the taking of more than \$100,000, within the meaning of Penal Code § 1203.045(a), thereby requiring the defendant to be denied probation.

SPECIAL ALLEGATION STATUTE OF LIMITATIONS FOR PC 803(C) OFFENSES

It is further alleged as to Counts 1 through 23 that the above offense(s) are described in Penal Code section 803(c) and prosecution was commenced within four years after the discovery of the commission of the offense(s) and within four years after the completion of the offense(s), within the meaning of Penal Code section 801.5.

ALLEGATION OF CIRCUMSTANCES IN AGGRAVATION

It is further alleged as to Counts 1 through 23 above, and the Special Allegation pursuant to Penal Code sections 186.11(a)(1) and (a)(2), that pursuant to California Penal Code section 1170(b)(2) as to the above felony offenses and allegations that the following circumstances in aggravation as defined in California Rules of Court section 4.421 apply and may justify the imposition of the upper term of imprisonment:

- CRC 4.421(a)(8): The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
- CRC 4.4.21(a)(9): The crime involved an attempted or actual taking or damage of great monetary value;

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1 **DECLARATION** 2 Further, attached and incorporated by reference is an Affidavit in Support of Arrest Warrant 3 and Complaint completed by a sworn peace officer from the California Department of Justice 4 which the complainant believes establishes probable cause for the arrest of defendant GHADA 5 KASSAB, for the above listed crimes. 6 Wherefore, A WARRANT OF ARREST IS REQUESTED. I declare under penalty of perjury, on information and belief, pursuant to the laws of the 7 8 State of California, that the foregoing is true and correct. 9 10 Date: May 8, 2025 Respectfully Submitted, 11 **ROB BONTA** Attorney General of California 12 Amy Bellah 13 14 AMY BELLAH Deputy Attorney General 15 16 17 MES SCAGLIONE 18 Deputy Attorney General 19 Attorneys for the People of the State of California 20 21 22 23 24 25 26 27 28