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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**  
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14 **PEOPLE OF THE STATE OF**  
15 **CALIFORNIA,**

16 Plaintiff,

17  
18 v.

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20 **GHADA KASSAB ( [REDACTED] ),**

21 Defendant.  
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Case No. CD307675

AG Case No. SD2018103634

**FELONY COMPLAINT**

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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: [REDACTED]) committed the following criminal  
27 offenses, all connected together in their commission yet constituting separate criminal offenses:  
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**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**  
**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. Ma [REDACTED] 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, 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 [REDACTED] and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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**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. [REDACTED] 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. C. [REDACTED] and 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. [REDACTED], Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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**COUNT 7**  
**Penal Code § 550(a)(5) – Felony**  
**Healthcare Insurance Fraud – 2, 3, or 5 years**

On or about and between, September 14, 2017 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 F. A. [REDACTED] Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

**COUNT 8**  
**Penal Code § 550(a)(5) – Felony**  
**Healthcare Insurance Fraud – 2, 3, or 5 years**

On or about and between, October 30, 2018 and January 11, 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 F. B. [REDACTED] Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

**COUNT 9**  
**Penal Code § 550(a)(5) – Felony**  
**Healthcare Insurance Fraud – 2, 3, or 5 years**

On or about and between, October 9, 2018 and August 16, 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. C. [REDACTED] and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, 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. [REDACTED] 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. [REDACTED] 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. A. [REDACTED] and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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**COUNT 13**  
**Penal Code § 550(a)(5) – Felony**  
**Healthcare Insurance Fraud – 2, 3, or 5 years**

On or about and between, August 22, 2019 and June 1, 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 S. A [REDACTED] Medicare and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

**COUNT 14**  
**Penal Code § 550(a)(5) – Felony**  
**Healthcare Insurance Fraud – 2, 3, or 5 years**

On or about and between, September 5, 2019 and May 11, 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 S. S [REDACTED], Medicare, and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

**COUNT 15**  
**Penal Code § 550(a)(5) – Felony**  
**Healthcare Insurance Fraud – 2, 3, or 5 years**

On or about and between, December 2, 2020 and November 17, 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. A [REDACTED] and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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**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. L [REDACTED] 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 [REDACTED] 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. P [REDACTED] and the Medi-Cal Healthcare Insurer, in violation of Penal Code section 550, subdivision (a)(5), a felony.

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1 **SPECIAL ALLEGATION #2**

2 **Penal Code § 1203.045(a)**

3 **Theft Exceeding \$100,000 – Probation Limitation**

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

7 **SPECIAL ALLEGATION**

8 **STATUTE OF LIMITATIONS FOR PC 803(C) OFFENSES**

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

13 **ALLEGATION OF CIRCUMSTANCES IN AGGRAVATION**

14 It is further alleged as to Counts 1 through 23 above, and the Special Allegation pursuant  
15 to Penal Code sections 186.11(a)(1) and (a)(2), that pursuant to California Penal Code section  
16 1170(b)(2) as to the above felony offenses and allegations that the following circumstances in  
17 aggravation as defined in California Rules of Court section 4.421 apply and may justify the  
18 imposition of the upper term of imprisonment:

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

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