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Superior Court of California
County of Los Angeles

AUG 20 2024

David W. Slayton, Executive Officer/Clerk of Court

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

B. Perez

24CJC FD5181

Case No.: GJ24-25/01

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

INDICTMENT

01 - GERARDO BARAJAS SANTILLAN,

02 - RUTH ELIZABETH ELEY,

03 - MARISOL RODRIGUEZ,

04 - CHRISTOPHER GONZALEZ,

05 - VIVIEN A. KONO,

06 - MARIA CONSORCIA PAGTAKHAN
LIM.

07 - VIVIAN BONOTAN PAGTAKHAN
AKA VIVIAN NICOLAS,

1 08 - VARTAN AKOPYAN,
2 [REDACTED]
3
4

Defendants.

5 A Grand Jury of the County of Los Angeles, State of California, hereby accuses by this
6 Indictment, the following defendants of committing, in the County of Los Angeles, before the
7 finding of this indictment, of the following crimes:

8 **COUNT 1**

9 **CONSPIRACY**

10 **(Penal Code § 182(a)(1) and Penal Code § 550(a)(6))**

11 From on or about and between December 1, 2015 to January 24, 2022, defendants
12 GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, CHRISTOPHER
13 GONZALEZ, VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN,
14 did unlawfully conspire together and with another person and persons whose identity is unknown
15 to the Grand Jury, to commit the crime of Insurance Fraud, in violation of Section 550(a)(6) of
16 the Penal Code, a felony, pursuant to and for the purpose of carrying out the objectives and
17 purposes of the aforesaid conspiracy, the said DEFENDANTS and other conspirators committed
18 the following overt act and act(s) in the County of Los Angeles:

19 (1) On or about and between December 12, 2015, and January 18, 2016, defendant
20 GERARDO SANTILLAN, who was suspended from the Medi-Cal Program along with his
21 company, HEAVENLY HOME HEALTH, entered into a General Services Agreement with
22 defendants RUTH ELEY and FOUR P's HEALTH SERVICES, INC., DBA COVENANT
23 HOME HEALTH OF CALIFORNIA (FOUR P's).

24 (2) On or about and between January 2016 and April 2019, defendants GERARDO
25 SANTILLAN and RUTH ELEY directed all Medi-Cal operations at FOUR P's, by directing
26 employees, managing patients, making business decisions, and submitting false claims to Medi-
27 Cal.

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1 (3) On or about and between January 2016 to April 2019, billing at FOUR P's increased
2 after GERARDO SANTILLAN took over all Medi-Cal operations at FOUR P's, billing the Medi-
3 Cal Program \$26.2 million and Medi-Cal paying FOUR P's a total of \$23.8 million despite being
4 suspended from Medi-Cal.

5 (4) On or about and between January 2019 and April 2019, defendants GERARDO
6 SANTILLAN and RUTH ELEY moved 55 Medi-Cal beneficiaries from FOUR P's to ANGEL
7 CARE HOME HEALTH, INC., (ANGEL CARE).

8 (5) On or about and between January 2019 and January 2022, defendants GERARDO
9 SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, and CHRISTOPHER GONZALEZ
10 took over the Medi-Cal operation at ANGEL CARE by directing employees, managing patients,
11 making business decisions, scheduling unlicensed nurses, and submitting false claims to Medi-
12 Cal despite GERARDO SANTILLAN being suspended from Medi-Cal.

13 (6) On or about and between January 2019 and January 2022, defendants VIVIEN KONO,
14 MARIA LIM, and VIVIAN NICOLAS, who are owners and operators of ANGEL CARE,
15 permitted defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, and
16 CHRISTOPHER GONZALEZ, take over the Medi-Cal operation at ANGEL CARE in exchange
17 for kickback payments.

18 (7) On or about and between January 2019 and January 2022, business at ANGEL CARE
19 increased after GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, and
20 CHRISTOPHER GONZALEZ, took over all Medi-Cal operations at ANGEL CARE, billing the
21 Medi-Cal Program over \$85 million and Medi-Cal paying ANGEL CARE over \$27 million.

22 (8) On or about and between January 2019 and January 2022, defendants VIVIEN KONO,
23 MARIA LIM, and VIVIAN NICOLAS received over \$4.8 million in kickbacks from Medi-Cal
24 payments for claims submitted by defendants GERARDO SANTILLAN, RUTH ELEY,
25 MARISOL RODRIGUEZ, and CHRISTOPHER GONZALEZ on behalf of ANGEL CARE.

26 (9) On or about and between January 2019 and January 2022, defendants GERARDO
27 SANTILLAN, RUTH ELEY, and MARISOL RODRIGUEZ made payments over \$4 million
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dollars to VERCHNA, INC., (VERCHNA), a company owned by defendant VARTAN AKOPYAN, from ANGEL CARE's bank accounts.

(10) On or about and between December 2019 and January 2022, defendants GERARDO SANTILLAN, RUTH ELEY, and MARISOL RODRIGUEZ moved 52 Medi-Cal beneficiaries from ANGEL CARE to NEIGHBORHOOD HOME HEALTH DBA RITE CARE HOME HEALTH (NEIGHBORHOOD).

(11) On or about and between December 2019 and January 2022, defendant GERARDO SANTILLAN entered into a business arrangement with defendant VARTAN AKOPYAN, who is the owner of NEIGHBORHOOD, where defendant VARTAN AKOPYAN permitted defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, and CHRISTOPHER GONZALEZ take over all Medi-Cal operations at NEIGHBORHOOD.

(12) On or about and between December 2019 and January 2022, defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, and CHRISTOPHER GONZALEZ took over the Medi-Cal operation at NEIGHBORHOOD by directing employees, managing patients, making business decisions, scheduling unlicensed nurses, and submitting false claims to Medi-Cal despite GERARDO SANTILLAN being suspended from Medi-Cal.

(13) On or about and between December 2019 and January 2022, business at NEIGHBORHOOD increased after GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, and CHRISTOPHER GONZALEZ took over all operations at NEIGHBORHOOD, billing the Medi-Cal Program over \$26 million and Medi-Cal paying NEIGHBORHOOD over \$9 million.

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ANGEL CARE HOME HEALTH

COUNT 2

INSURANCE FRAUD

(Penal Code § 550(a)(6))

From on or about and between January 1, 2019 to January 24, 2022, defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, CHRISTOPHER GONZALEZ, VIVIEN KONO, MARIA LIM, and VIVIAN NICOLAS, did aid, abet, solicit, and conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a healthcare benefit, in violation of section 550, subdivision (a)(6), of the Penal Code, a felony.

COUNT 3

MEDI-CAL FRAUD

(Welfare & Institutions Code § 14107(b)(4)(A))

From on or about and between January 1, 2019 to January 24, 2022, defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, CHRISTOPHER GONZALEZ, VIVIEN KONO, MARIA LIM, and VIVIAN NICOLAS, knowingly and willfully executed, or attempted to execute, a scheme or artifice to defraud the Medi-Cal Program or any other health care program administered by the department or its agents or contractors, in violation of section 14107, subdivision (b)(4)(A), of the Welfare and Institutions Code, a felony.

COUNT 4

GRAND THEFT

(Penal Code § 487(a))

From on or about and between January 1, 2019 to January 24, 2022, defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, CHRISTOPHER GONZALEZ, VIVIEN KONO, MARIA LIM, and VIVIAN NICOLAS, did unlawfully steal, take, carry, lead, and drive away personal property of THE STATE OF CALIFORNIA MEDI-

1 CAL PROGRAM, specifically, money, which had a value exceeding nine hundred fifty dollars
2 (\$950), in violation of section 487, subdivision (a), of the Penal Code, a felony.

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4 **NEIGHBORHOOD HOME HEALTH**

5 **COUNT 5**

6 **INSURANCE FRAUD**

7 **(Penal Code § 550(a)(6))**

8 From on or about and between June 1, 2020 to January 24, 2022, defendants GERARDO
9 SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, CHRISTOPHER GONZALEZ, and
10 VARTAN AKOPYAN, did aid, abet, solicit, and conspire with another and did knowingly make
11 and cause to be made a false and fraudulent claim for payment of a healthcare benefit, in violation
12 of section 550, subdivision (a)(6), of the Penal Code, a felony.

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14 **COUNT 6**

15 **MEDI-CAL FRAUD**

16 **(Welfare & Institutions Code § 14107(b)(4)(A))**

17 From on or about and between June 1, 2020 to January 24, 2022, defendants GERARDO
18 SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, CHRISTOPHER GONZALEZ, and
19 VARTAN AKOPYAN, knowingly and willfully executed, or attempted to execute, a scheme or
20 artifice to defraud the Medi-Cal Program or any other health care program administered by the
21 department or its agents or contractors, in violation of section 14107, subdivision (b)(4)(A), of the
22 Welfare and Institutions Code, a felony.

23 **COUNT 7**

24 **GRAND THEFT**

25 **(Penal Code § 487(a))**

26 From on or about and between June 1, 2020 to January 24, 2022, defendants GERARDO
27 SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, CHRISTOPHER GONZALEZ, and
28 VARTAN AKOPYAN, did unlawfully steal, take, carry, lead, and drive away personal property

1 of THE STATE OF CALIFORNIA MEDI-CAL PROGRAM, specifically, money, which had a
2 value exceeding nine hundred fifty dollars (\$950), in violation of section 487, subdivision (a), of
3 the Penal Code, a felony.

4 **COUNT 8**

5 **CONSPIRACY**

6 **(Penal Code § 182(a)(1) and Penal Code § 186.10(a))**

7 From on or about January 1, 2019 through January 24, 2022, defendants GERARDO
8 SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM,
9 VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conspire together and with
10 another person and persons whose identity is unknown to the Grand Jury, to commit the crime of
11 Money Laundering, in violation of Section 186.10 subdivision(a) of the Penal Code, a felony,
12 pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid
13 conspiracy, the said DEFENDANTS and other conspirators committed the following overt act
14 and act(s) in the County of Los Angeles:

15 (1) On or about September 2019, defendant VIVIEN KONO signed the Medi-Cal
16 Electronic Fund Transfer (EFT) Authorization for ANGEL CARE, listing ANGEL CARE's
17 JPMC Morgan Chase Bank Account Number [REDACTED]

18 (2) On or about and between January 2019 to November 2019, defendants VIVIEN KONO,
19 MARIA LIM, and VIVIAN NICOLAS received over \$8 million dollars in Medi-Cal Warrants for
20 ANGEL CARE in ANGEL CARE's JPMC Morgan Chase Bank, account number [REDACTED]

21 (3) On or about and between December 2019 to January 2022, defendants VIVIEN KONO,
22 MARIA LIM, and VIVIAN NICOLAS received over \$18 million dollars in Medi-Cal Warrants
23 for ANGEL CARE in ANGEL CARE's JPMC Chase Bank, account number [REDACTED]

24 (4) On or about and between November 2019 and January 2022, defendants VIVIEN
25 KONO, MARIA LIM, and VIVIAN NICOLAS made multiple electronic transfers in excess of
26 \$20 million dollars from ANGEL CARE's JPMC Chase Bank Account, [REDACTED] to other
27 ANGEL CARE bank accounts, specifically JMPC Morgan Chase bank account numbers [REDACTED]

28 [REDACTED] and [REDACTED]

1 (5) On or about and between December 2019 and January 2022, defendants VIVIEN
2 KONO, MARIA LIM, and VIVIAN NICOLAS as owners and operators of ANGEL CARE, gave
3 defendants GERARDO SANTILLAN, RUTH ELEY, and MARISOL RODRIGUEZ, who were
4 not owners or signers of ANGEL CARE bank accounts, access to ANGEL CARE bank accounts.

5 (6) On or about June 2019 to October 2020, defendant RUTH ELEY received and
6 deposited over \$130,000 from VERCHNA (JPMC Chase Bank, Account No. [REDACTED]) into
7 RUTH ELEY's Wells Fargo Bank, Account Number [REDACTED]

8 (7) On or about and between December 2020 and January 2021, defendant RUTH ELEY
9 deposited three (3) checks from ANGEL CARE (JPMC Bank Account No. [REDACTED])
10 totaling \$54,900 into GLOBAL's Wells Fargo Bank, Account No. [REDACTED]

11 (8) On or about and between May 2019 and May 2021, defendants MARIA LIM, VIVIEN
12 KONO, and GERARDO SANTILLAN, issued multiple checks totaling over \$4 million dollars to
13 VERCHNA from various ANGEL CARE's JPMC Morgan Chase Bank accounts (account
14 numbers [REDACTED]) which were
15 deposited into VERCHNA's JP Morgan Chase Bank (account number [REDACTED]) and Wells
16 Fargo Bank (account number [REDACTED])

17 (9) On or about and between January 2020 and October 2020, defendant VARTAN
18 AKOPYAN wrote multiple checks, totaling over \$1.4 million dollars from VERCHNA (JPMC
19 Morgan Chase Bank, Account No. [REDACTED]) to NEIGHBORHOOD, which were deposited
20 into NEIGHBORHOOD's U.S. Bank account number [REDACTED] and Wells Fargo Bank
21 account number [REDACTED]

22 (10) On or about and between August 2019 and December 2019, VERCHNA received a
23 total of \$54,253 from NEIGHBORHOOD, which defendant VARTAN AKOPYAN deposited
24 into VERCHNA's bank accounts at JP Morgan Chase Bank, account number [REDACTED]

25 (11) On or about and between August 2019 and June 2021, defendant MARISOL
26 RODRIGUEZ deposited over \$778,000 from ANGEL CARE's bank accounts (specifically JPMC
27 Account Nos: [REDACTED]) into SOLIMAR's bank account
28 (Wells Fargo Bank, Account No. [REDACTED]).

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COUNT 9

MONEY LAUNDERING

(Penal Code § 186.10(a))

On or about June 10, 2019, in or around the County of Los Angeles, Defendants VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, , did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$828,045.43 (Eight Hundred Twenty-Eight Thousand and Forty-Five Dollars and Forty-Three Cents) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

COUNT 10

MONEY LAUNDERING

(Penal Code § 186.10(a))

On or about July 15, 2019, in or around the County of Los Angeles, Defendants MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$1,850,508.96 (One Million Eight Hundred Fifty Thousand Five Hundred and Eight Dollars and Ninety-Six Cents) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

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COUNT 11

MONEY LAUNDERING

(Penal Code § 186.10(a))

On or about August 5, 2019, in or around the County of Los Angeles, Defendants MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$1,092,029.80 (One Million Ninety-Two Thousand Twenty-Nine Dollars and Eighty Cents) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

COUNT 12

MONEY LAUNDERING

(Penal Code § 186.10(a))

On or about August 26, 2019, in or around the County of Los Angeles, Defendants MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$984,925.32 (Nine Hundred Eighty-Four Thousand Nine Hundred and Twenty-Five Dollars and Thirty-Two Cents) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

COUNT 13

MONEY LAUNDERING

(Penal Code § 186.10(a))

On or about October 7, 2019, in or around the County of Los Angeles, Defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$1,994,291.83 (One Million Nine Hundred Ninety-Four Thousand Two Hundred and Ninety-One Dollars and Eighty-Three Cents) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

COUNT 14

MONEY LAUNDERING

(Penal Code § 186.10(a))

On or about November 4, 2019, in or around the County of Los Angeles, Defendants GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$1,384,859.16 (One Million Three Hundred Eighty-Four Thousand Eight Hundred and Fifty-Nine Dollars and Sixteen Cents) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

1 **COUNT 15**

2 **MONEY LAUNDERING**

3 **(Penal Code § 186.10(a))**

4 On or about November 25, 2019, in or around the County of Los Angeles, Defendants
5 GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA
6 LIM, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct a transaction
7 involving a monetary instrument or instruments of a value exceeding \$1,017,973.06 (One Million
8 Seventeen Thousand Nine Hundred and Seventy-Three Dollars and Six Cents) through a financial
9 institution with the intent to promote, manage, establish, carry on, and facilitate the promotion,
10 management, establishment, and carrying on of a criminal activity, to wit: INSURANCE
11 FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived
12 directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section
13 186.10, subdivision (a), a felony.

14
15 **COUNT 16**

16 **MONEY LAUNDERING**

17 **(Penal Code § 186.10(a))**

18 On or about January 21, 2020, in or around the County of Los Angeles, Defendants
19 GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA
20 LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN did unlawfully conduct and attempt to
21 conduct a transaction involving a monetary instrument or instruments of a value exceeding
22 \$2,145,064.37 (Two Million One Hundred Forty-Five Thousand Sixty-Four Dollars and Thirty-
23 Seven Cents) through a financial institution with the intent to promote, manage, establish, carry
24 on, and facilitate the promotion, management, establishment, and carrying on of a criminal
25 activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented
26 the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in
27 violation of Penal Code section 186.10, subdivision (a), a felony.

1 **COUNT 17**

2 **MONEY LAUNDERING**

3 **(Penal Code § 186.10(a))**

4 On or about March 9, 2020, in or around the County of Los Angeles, Defendants
5 GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA
6 LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN did unlawfully conduct and attempt to
7 conduct a transaction involving a monetary instrument or instruments of a value exceeding
8 \$1,193,167.07 (One Million One Hundred Ninety-Three Thousand One Hundred and Sixty-Seven
9 Dollars and Seven Cents) through a financial institution with the intent to promote, manage,
10 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a
11 criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument
12 represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal
13 activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

14
15 **COUNT 18**

16 **MONEY LAUNDERING**

17 **(Penal Code § 186.10(a))**

18 On or about April 20, 2020, in or around the County of Los Angeles, Defendants
19 GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA
20 LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to
21 conduct a transaction involving a monetary instrument or instruments of a value exceeding
22 \$3,955,412.63 (Three Million Nine Hundred Fifty-Five Thousand Four Hundred and Twelve
23 Dollars and Sixty-Three Cents) through a financial institution with the intent to promote, manage,
24 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a
25 criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument
26 represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal
27 activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

1 **COUNT 19**

2 **MONEY LAUNDERING**

3 **(Penal Code § 186.10(a))**

4 On or about June 1, 2020, in or around the County of Los Angeles, Defendants GERARDO
5 SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM,
6 VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct
7 a transaction involving a monetary instrument or instruments of a value exceeding \$1,748,050.20
8 (One Million Seven Hundred and Forty-Eight Thousand Fifty Dollars and Twenty Cents) through
9 a financial institution with the intent to promote, manage, establish, carry on, and facilitate the
10 promotion, management, establishment, and carrying on of a criminal activity, to wit:
11 INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of,
12 and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal
13 Code section 186.10, subdivision (a), a felony.

14
15 **COUNT 20**

16 **MONEY LAUNDERING**

17 **(Penal Code § 186.10(a))**

18 On or about July 6, 2020, in or around the County of Los Angeles, Defendants GERARDO
19 SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM,
20 VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct
21 a transaction involving a monetary instrument or instruments of a value exceeding \$3,119,428.21
22 (Three Million One Hundred Nineteen Thousand Four Hundred Twenty-Eight Dollars and
23 Twenty-One Cents) through a financial institution with the intent to promote, manage, establish,
24 carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal
25 activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented
26 the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in
27 violation of Penal Code section 186.10, subdivision (a), a felony.

1 **COUNT 21**

2 **MONEY LAUNDERING**

3 **(Penal Code § 186.10(a))**

4 On or about December 30, 2020, in or around the County of Los Angeles, Defendants
5 GERARDO SANTILLAN, RUTH ELEY, MARISOL RODRIGUEZ, VIVIEN KONO, MARIA
6 LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to
7 conduct a transaction involving a monetary instrument or instruments of a value exceeding
8 \$2,192,227.61 (Two Million One Hundred Ninety-Two Thousand Two Hundred Twenty-Seven
9 Dollars and Sixty-One Cents) through a financial institution with the intent to promote, manage,
10 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a
11 criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument
12 represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal
13 activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

14
15 **COUNT 22**

16 **MONEY LAUNDERING**

17 **(Penal Code § 186.10(a))**

18 On or about February 16, 2021, in or around the County of Los Angeles, Defendants
19 MARISOL RODRIGUEZ, VIVIEN KONO, MARIA LIM, and VIVIAN NICOLAS did
20 unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or
21 instruments of a value exceeding \$267,806.27 (Two Hundred Sixty-Seven Thousand Eight
22 Hundred and Six Dollars and Twenty-Seven Cents) through a financial institution with the intent
23 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
24 and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the
25 monetary instrument represented the proceeds of, and was derived directly or indirectly from the
26 proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

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COUNT 23

MONEY LAUNDERING

(Penal Code § 186.10(a))

On or about February 22, 2021, in or around the County of Los Angeles, Defendants GERARDO SANTILLAN, VIVIEN KONO, MARIA LIM, VIVIAN NICOLAS, and VARTAN AKOPYAN, did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$304,739.38 (Three Hundred and Four Thousand Seven Hundred and Thirty-Nine Dollars and Thirty-Eight Cents) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit: INSURANCE FRAUD, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, in violation of Penal Code section 186.10, subdivision (a), a felony.

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1 **FIRST SPECIAL ALLEGATION**

2 **Amount Laundered over \$1 Million – Penal Code §186.10 (c)(1)(C)**

3 It is further alleged that the financial transactions which DEFENDANTS 1, 2, 3, 5, 6, 7, and
4 8 did commit in violation of Penal Code section 186.10, subdivision (a) exceeded \$1 Million,
5 within the meaning of Penal Code section 186.10 (c)(1)(C).

6 **SECOND SPECIAL ALLEGATION**

7 **Aggravated White Collar Crime Enhancement - Penal Code § 186.11(a)(2)**

8 Furthermore, it is alleged that Counts 1 through 23 are related felonies, a material element
9 of which is fraud, and resulted in the loss by the State of California Medi-Cal Program of, more
10 than five hundred thousand dollars (\$500,000), thus subjecting DEFENDANTS 1-8 to the
11 additional punishment provided for in Penal Code sections 186.11(a)(2).

12 **THIRD SPECIAL ALLEGATION**

13 **Probation Limitation – Penal Code § 1203.045**

14 Furthermore, it is alleged that DEFENDANTS, in the commission of Counts 1 through 23,
15 with the intent to do so, unlawfully took in excess of one hundred thousand dollars (\$100,000),
16 and therefore should be denied probation, pursuant to Penal Code section 1203.045.

17 **FOURTH SPECIAL ALLEGATION**

18 **Statute of Limitations – Penal Code § 801.5 and § 803.6**

19 The crimes in Counts 1-8 are all felonies, a material element of which is fraud and were
20 part of an ongoing and continuing conspiracy to commit Medi-Cal fraud. The same defendants
21 conspired to commit Medi-Cal fraud across multiple home health agencies, spanning across
22 multiple years. The same defendants started their crimes at ANGEL CARE where they billed the
23 Medi-Cal Program and received Medi-Cal payments up until January 2022. They continued their
24 crimes at NEIGHBORHOOD. The completion of defendants' crime occurred when the Medi-Cal
25 Program issued its last reimbursement payment on January 24, 2022, to NEIGHBORHOOD for
26 claims submitted to Medi-Cal.

27 The crimes in Counts 8-23 are all felonies. The conspiracy to commit money laundering
28 was discovered in September 2022 when law enforcement agents obtained bank records via

1 search warrant. An analysis of the bank records led to the discovery of multiple money laundering
2 crimes as specified in Counts 8-23 as well as the conspiracy to commit money laundering by
3 defendants 1, 2, 3, 5, 6, 7, and 8 across multiple home health agencies.

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TRUE BILL

fourteen (14) *sg*

This indictment, having been approved and concurred in by at least ~~twelve~~ (12) members of the Grand Jury in and for the County of Los Angeles, is a true bill with a finding that the requirements of Penal Code section 923(a) have been satisfied.

Dated: 8/20/24

FOREPERSON LOS ANGELES COUNTY
GRAND JURY

Presented by the Foreman to the Court in the presence of the Grand Jury and filed this _____ day of 8-20-, 2024.

CLERK OF THE COURT

By: *BAJ*
DEPUTY CLERK