

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,
v.
RONALD SELWYN GRUSD,
dob 05/06/46;
GONZALO ERNESTO PAREDES,
dob 02/06/56;
ALEXANDER KIEV MARTINEZ,
dob 12/19/77;
RUBEN MARCIAL MARTINEZ,
dob 09/16/56;
Defendants

CT No. SCD255519

DA No. ADY479

INDICTMENT

PC296 DNA TEST STATUS SUMMARY

Defendant

DNA Testing Requirements

GRUSD, RONALD SELWYN

DNA sample required upon conviction

PAREDES, GONZALO ERNESTO

DNA sample required upon conviction

MARTINEZ, ALEXANDER KIEV

DNA sample required upon conviction

MARTINEZ, RUBEN MARCIAL

DNA sample required upon conviction

The Grand Jury of the County of San Diego, State of California, accuses the Defendant(s) of committing, in the County of San Diego, State of California, before the finding of this Indictment, the following crime(s):

CHARGES

COUNT 1 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about December 16, 2012, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 2 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about December 28, 2012, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 3 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about March 13, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 4 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about March 18, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 5 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about June 7, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 6 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about June 10, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 7 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about June 11, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 8 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about June 20, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 9 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about August 30, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 10 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about September 4, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 11 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about September 9, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 12 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about September 12, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 13 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about September 17, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 14 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about December 11, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 15 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about December 17, 2013, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 16 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about March 11, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 17 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about May 1, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 18 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (AmTrust North America-EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 19 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (ESIS Insurance-EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 20 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Berkshire Hathaway-EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 21 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Liberty Mutual Insurance-EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 22 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Zenith Insurance-EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 23 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Zurich North America Insurance-MRI), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 24 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Insurance Company of the West-MRI), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 25 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Zurich North America-Shockwave), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 26 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Applied Risk Services--EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 27 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Liberty Mutual Insurance--Shockwave), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 28 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Meadowbrook Insurance--Shockwave), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 29 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (State Compensation Insurance Fund--EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 30 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (State Compensation Insurance Fund--Shockwave), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 31 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Sedgwick Claims--MRI), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 32 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Sedgwick Claims--Shockwave), in violation of PENAL CODE SECTION 550(b)(3).

CHARGES (cont'd)

COUNT 33 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Sedgwick Claims--EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 34 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Tristar Risk Management--Shockwave), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 35 - INSURANCE - CONCEAL EVENT AFFECTING CLAIM

On or about and between June 25, 2014 and November 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did unlawfully conceal and knowingly fail to disclose the occurrence of, and knowingly assist and conspire with another person to conceal and knowingly fail to disclose the occurrence of, an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled (Gallagher Bassett Services--EMG/NCV), in violation of PENAL CODE SECTION 550(b)(3).

COUNT 36 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about July 11, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 37 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about September 15, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 38 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about October 29, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 39 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about November 7, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 40 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about December 3, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 41 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about December 15, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 42 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about December 17, 2014, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 43 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about and between January 23, 2015 and July 16, 2015, RONALD SELWYN GRUSD and GONZALO ERNESTO PAREDES, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform (compound creams) or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 44 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about March 4, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3327--\$8,500), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 45 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about March 4, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3328--\$7,400), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 46 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about March 4, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3329--\$8,400), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 47 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about April 6, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 48 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about April 10, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise, as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 49 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about May 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3445--\$6,000 to Desert Blue Moon), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 50 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about May 27, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3447--\$3,300 to Line of Sight), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 51 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about July 16, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3510--\$2,500.00 to Line of Sight), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 52 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about July 16, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3520--\$5,000.00 to Line of Sight), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

COUNT 53 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about July 16, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3518--\$9,500.00 to Desert Blue Moon) as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.

CHARGES (cont'd)

COUNT 54 - OFFER, DELIVER, RECEIVE AND ACCEPT COMPENSATION FOR REFERRING CLIENTS/PATIENTS

On or about July 16, 2015, RONALD SELWYN GRUSD, GONZALO ERNESTO PAREDES, ALEXANDER KIEV MARTINEZ, and RUBEN MARCIAL MARTINEZ, did offer, deliver, receive and accept a rebate, refund, commission, preference, patronage, dividend, discount and other consideration whether in the form of money or otherwise (#3519--\$9,500.00 to Desert Blue Moon), as compensation or inducement for referring clients or patients to perform or obtain services or benefits pursuant to the California Workers' Compensation law, in violation of LABOR CODE SECTION 3215.



THIS INDICTMENT, NUMBERED SCD255519, CONSISTS OF 54 COUNTS.

"A TRUE BILL"

Bonnie M. Dumanis

District Attorney, County of San Diego, State of California

Foreman of the Grand Jury

Deputy District Attorney

DATE: _____

DATE: _____