

ENDORSED FILED

JUN 14 2024

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SUTTER  
CLERK OF THE COURT  
By M. BELMONTES Deputy

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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF SUTTER  
11

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

14 Plaintiff,

15 v.

16 **Jaspreet Jagpal,**

17 Defendant.  
18

Case No. CRF24-1550

**FELONY COMPLAINT**

AG Case No. SA2020303024

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20 The People of the State of California hereby allege that in the County of Sutter, State of  
21 California, and elsewhere, within the State of California, before the making of this criminal  
22 complaint, the above-named defendant, JASPREET JAGPAL (DOB 12/18/89), committed the  
23 following different criminal offenses all connected together in their commission, and being two or  
24 more different offenses of the same class of crimes or offenses, under separate counts:

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**COUNT 1**  
**Penal Code § 550(a)(5) – FELONY**  
**Fraud – 2, 3 or 5 years**

On or about and between January 1, 2020 through November 21, 2020, in the County of Sutter, and elsewhere, defendant JASPREET JAGPAL did willfully, knowingly, and unlawfully make and cause to be made a writing, with the intent to present it in support of a false and fraudulent claim, in violation of section 550(a)(5) of the Penal Code, a felony; to wit: minor child L.E. did not receive applied behavior analysis services for which JAGPAL billed, and as a result JAGPAL fraudulently received approximately \$49,169.

**COUNT 2**  
**Penal Code § 550(a)(5) – FELONY**  
**Fraud – 2, 3 or 5 years**

On or about and between March 29, 2020 through August 1, 2020, in the County of Sutter, and elsewhere, defendant JASPREET JAGPAL did willfully, knowingly, and unlawfully make and cause to be made a writing, with the intent to present it in support of a false and fraudulent claim, in violation of section 550(a)(5) of the Penal Code, a felony; to wit: minor child A.A. did not receive applied behavior analysis services for which JAGPAL billed, and as a result JAGPAL fraudulently received approximately \$32,554.

**COUNT 3**  
**Penal Code § 550(a)(5) – FELONY**  
**Fraud – 2, 3 or 5 years**

On or about and between March 29, 2020 through August 1, 2020, in the County of Sutter, and elsewhere, defendant JASPREET JAGPAL did willfully, knowingly, and unlawfully make and cause to be made a writing, with the intent to present it in support of a false and fraudulent claim, in violation of section 550(a)(5) of the Penal Code, a felony; to wit: minor child B.D. did not receive applied behavior analysis services for which JAGPAL billed, and as a result JAGPAL fraudulently received approximately \$31,562.

**COUNT 4**  
**Penal Code § 550(a)(5) – FELONY**  
**Fraud – 2, 3 or 5 years**

On or about and between March 29, 2020 through August 1, 2020, in the County of Sutter, and elsewhere, defendant JASPREET JAGPAL did willfully, knowingly, and unlawfully make

1 and cause to be made a writing, with the intent to present it in support of a false and fraudulent  
2 claim, in violation of section 550(a)(5) of the Penal Code, a felony; to wit: minor child K.M. did  
3 not receive applied behavior analysis services for which JAGPAL billed, and as a result JAGPAL  
4 fraudulently received approximately \$25,062.50.

5 **COUNT 5**  
6 **Penal Code § 550(a)(5) – FELONY**  
7 **Fraud – 2, 3 or 5 years**

8 On or about and between March 29, 2020 through August 1, 2020, in the County of Sutter,  
9 and elsewhere, defendant JASPREET JAGPAL did willfully, knowingly, and unlawfully make  
10 and cause to be made a writing, with the intent to present it in support of a false and fraudulent  
11 claim, in violation of section 550(a)(5) of the Penal Code, a felony; to wit: minor child B.P. did  
12 not receive applied behavior analysis services for which JAGPAL billed, and as a result JAGPAL  
13 fraudulently received approximately \$28,408.

14 **SPECIAL ALLEGATION**  
15 **Aggravated White Collar Crime Enhancement**  
16 **Penal Code §§ 186.11(a)(1) and (a)(3)**

17 It is further alleged, pursuant to section 186, subdivisions (a)(1) and (a)(3) of the Penal  
18 Code, that the offenses alleged in Counts 1, 2, 3, 4, and 5 are felonies, a material element of each  
19 Count is fraud, that JASPREET JAGPAL engaged in a pattern of related felony conduct, and the  
20 combined pattern of related felony conduct resulted in a loss to the victim of more than \$100,000.

21 **SPECIAL ALLEGATION**  
22 **Extended Statute of Limitations**  
23 **Penal Code §§ 803(c) and 801.5**

24 It is further alleged, pursuant to sections 801.5 and 803, subdivision (c) of the Penal Code,  
25 that the offenses alleged in Counts 1, 2, 3, 4, and 5 are felonies, and that no victim of said  
26 violation and no law enforcement agency chargeable with the investigation and prosecution of  
27 said violation had actual and constructive knowledge of said violations prior to August 6, 2020  
28 and August 20, 2020. On August 6, 2020, the mother of K.M. informed Anthem that Anthem had  
been billed for services not rendered to K.M. On August 20, 2020, an employee of Anthem  
relayed the information provided by the mother of K.M. to a special agent for the Division of  
Medi-Cal Fraud and Elder Abuse (DMFEA), California Department of Justice. These offenses

1 were not discovered earlier because neither Anthem nor DMFEA were aware that JASPREET  
2 JAGPAL fraudulently billed for services not rendered during the early months of the COVID-19  
3 pandemic due to JAGPAL deliberately providing false information to Anthem when JAGPAL  
4 claimed to have provided services JAGPAL did not, in fact, provide.

5 **SPECIAL ALLEGATION**  
6 **Extended Statute of Limitations**  
7 **Penal Code §§ 803(c) and 801.5**

8 It is further alleged, pursuant to sections 801.5 and 803, subdivision (c) of the Penal Code,  
9 that the offenses alleged in Counts 1, 2, 3, 4, and 5 are felonies, and that each offense was  
10 completed no earlier than the date below, on which JASPREET JAGPAL claimed to have  
11 provided applied behavior analysis services to the minor child listed in each Count, services that  
12 JAGPAL did not, in fact, provide:

13 for Count 1: November 21, 2020;

14 for Count 2: August 1, 2020;

15 for Count 3: August 1, 2020;

16 for Count 4: August 1, 2020; and

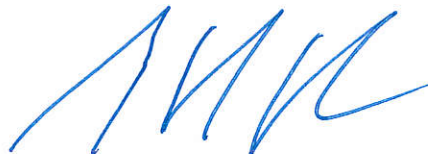
17 for Count 5: August 1, 2020.

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

20 Dated: June 14, 2024

21 Respectfully Submitted,

22 ROB BONTA  
23 Attorney General of California

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25 ED GRUBAUGH  
26 Deputy Attorney General  
27 *Attorneys for the People of the State of*  
28 *California*

1 **REQUEST FOR DISCOVERY**

2 Pursuant to Penal Code § 1054.5, subdivision (b), the People request from defendants and  
3 defense counsel all materials and information required to be disclosed to the prosecution by the  
4 defense under the authority of Penal Code § 1054.3, including the following:

- 5 1. The names and addresses of persons, other than the defendants, whom the  
6 defendants intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a).]
- 7 2. Any relevant written or recorded statements of persons whom the defendants  
8 intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a).]
- 9 3. Any reports of the statements of persons whom the defendants intend to call as  
10 witnesses at trial. [Pen. Code § 1054.3, subd. (a).]
- 11 4. Any reports or statements of experts made in connection with the case. [Pen. Code  
12 § 1054.3, subd. (a).]
- 13 5. Any results of physical or mental examinations, scientific tests, experiments or  
14 comparisons which the defendants intend to offer in evidence at the trial. [Pen. Code § 1054.3,  
15 subd. (a).]
- 16 6. The opportunity to view any real evidence which the defendants intend to offer in  
17 evidence at the trial. [Pen. Code § 1054.3, subd. (b).]

18 This is a continuing request for the above information. If the information becomes available  
19 at a future time, the prosecution, by this request, asks that it be immediately disclosed to the  
20 prosecution.

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1 **HOLDING ORDER**

2 Defendant JASPREET JAGPAL:

3 \_\_\_\_\_ Based on the evidence presented at the preliminary hearing, it appears that the  
4 following offenses charged in the above Complaint have been committed and there is sufficient  
5 cause to believe Defendant JASPREET JAGPAL is guilty of these offenses.

6 \_\_\_\_\_ Defendant has waived preliminary hearing of the offenses charged in the above  
7 complaint. Exceptions/Additions/Conditions: \_\_\_\_\_

8 IT IS ORDERED, pursuant to Penal Code section 872, it appearing that the offense(s) in  
9 the within complaint have been committed, and that there is sufficient cause to believe that the  
10 Defendant is guilty and held to answer to the following offenses:

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COUNT	CHARGE	CHARGE RANGE
14 1	Penal Code § 550(a)(5) - a Felony: Fraud	2, 3, or 5 yr.
15 2	Penal Code § 550(a)(5) - a Felony: Fraud.	2, 3, or 5 yr.
16 3	Penal Code § 550(a)(5) - a Felony: Fraud	2, 3, or 5 yr.
17 4	Penal Code § 550(a)(5) - a Felony: Fraud	2, 3, or 5 yr.
18 5	Penal Code § 550(a)(5) - a Felony: Fraud	2, 3, or 5 yr.

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21 In my capacity as Judge of the Superior court, I deem the within Complaint to be the  
22 Information and order it filed as such in the Superior Court.

23 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

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25 JUDGE OF THE SUPERIOR COURT  
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