

1 ROB BONTA  
Attorney General of California  
2 THOMAS M. BRENNAN  
Supervising Deputy Attorney General  
3 ED GRUBAUGH  
Deputy Attorney General  
4 State Bar No. 280220  
Telephone: (916) 621-1833  
5 E-mail: [Ed.Grubaugh@doj.ca.gov](mailto:Ed.Grubaugh@doj.ca.gov)  
BIANCA YIP  
6 Deputy Attorney General  
State Bar No. 283553  
7 Telephone: (916) 621-1806  
E-mail: [Bianca.Yip@doj.ca.gov](mailto:Bianca.Yip@doj.ca.gov)  
8 Division of Medi-Cal Fraud and Elder Abuse  
2329 Gateway Oaks Drive, Suite 200  
9 Sacramento, CA 95833-4252  
10 *Attorneys for the People of the State of California*

**FILED**  
SUPERIOR COURT STOCKTON

JUN 18 2025

STEPHANIE BOHRER, CLERK  
BY  DEPUTY

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF SAN JOAQUIN

14 THE PEOPLE OF THE STATE OF  
15 CALIFORNIA,

16 Plaintiff,

17 v.

18 SHIREEN BEGUM,

19 MUSTAFA MICHAEL KAZEMI,

20 SARKHAN MURAD KOSHKARLI,

21 ALOK MALANI,

22 NARENDRA MALANI, and

23 MOHAMMED ABDUL MAJID SIDDIQUI,

24 Defendants.  
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Case No.

STK-CR-FECOD-2025- 6452

**FELONY COMPLAINT**

[AG DOCKET Nos.:  
SF2025301656,  
SF2025301667,  
SF2025302742,  
SF2021304766,  
SF2025301665, and  
SF2025301670.]

26 The People of the State of California hereby allege that in the County of San Joaquin, and  
27 elsewhere within the State of California, before the making of this criminal complaint, the above-  
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1 named defendants, SHIREEN BEGUM, (DOB [REDACTED]), MUSTAFA MICHAEL KAZEMI  
2 (DOB [REDACTED]), SARKHAN MURAD KOSHKARLI (DOB [REDACTED]), ALOK MALANI  
3 (DOB [REDACTED]), NARENDRA MALANI (DOB [REDACTED]), and MOHAMMED ABDUL  
4 MAJID SIDDIQUI (DOB [REDACTED]), committed the following different criminal offenses, all  
5 connected together in their commission, and being two or more different offenses of the same class  
6 of crimes or offenses, under separate counts:

7  
8 **COUNT I**

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

10 Beginning on or about September 1, 2017 and continuing through March 12, 2025,  
11 defendants SHIREEN BEGUM, MUSTAFA MICHAEL KAZEMI, SARKHAN MURAD  
12 KOSHKARLI, ALOK MALANI, NARENDRA MALANI, and MOHAMMED ABDUL MAJID  
13 SIDDIQUI did aid, abet, solicit and/or conspire with another to knowingly prepare, make or  
14 subscribe a writing or writings, with the intent to present and use it, or to allow it to be presented,  
15 in support of a false and fraudulent Medi-Cal claim or claims, in violation of Penal Code section  
16 550, subdivision (a)(5), a felony.

17 **COUNT II**

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

19 Beginning on or about September 1, 2017 and continuing through March 12, 2025,  
20 defendants SHIREEN BEGUM, MUSTAFA MICHAEL KAZEMI, SARKHAN MURAD  
21 KOSHKARLI, ALOK MALANI, NARENDRA MALANI, and MOHAMMED ABDUL MAJID  
22 SIDDIQUI did aid, abet, solicit and/or conspire with another to knowingly prepare, make or  
23 subscribe a writing or writings, with the intent to present and use it, or to allow it to be presented,  
24 in support of a false and fraudulent Medicare claim or claims, in violation of Penal Code section  
25 550, subdivision (a)(5), a felony.

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1 **COUNT III**

2 **Penal Code, § 182(a)(1)/ Penal Code § 550(a)(5)**  
3 **Conspiracy to Commit Healthcare Insurance Fraud – 2, 3, or 5 years Imprisonment**

4 Beginning on or about September 1, 2017 and continuing through March 12, 2025,  
5 defendants SHIREEN BEGUM, MUSTAFA MICHAEL KAZEMI, SARKHAN MURAD  
6 KOSHKARLI, ALOK MALANI, NARENDRA MALANI, and MOHAMMED ABDUL MAJID  
7 SIDDIQUI did unlawfully conspire together and with another person and persons whose identity  
8 is unknown to commit the crime of Healthcare Insurance Fraud, in violation of Section 550(a)(5)  
9 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and  
10 purposes of the aforesaid conspiracy, that said conspirators committed the following overt act and  
11 acts at and in the Counties of San Joaquin and Alameda:

12 **Overt Act #1**

13 On or about and in between September 1, 2017 and March 12, 2025, Defendant, **Narendra**  
14 **Malani**, provided a signature stamp containing his DEA identification number to Defendant, **Alok**  
15 **Malani**.

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17 **Overt Act #2**

18 On or about and between September 1, 2017 and February 28, 2024, Defendant, **Mustafa**  
19 **Kazemi**, provided the password for his Wellsky electronic medical chart account to Defendant,  
20 **Alok Malani**.

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22 **Overt Act #3**

23 On or about September 1, 2017 and continuing through March 12, 2025, Defendant,  
24 **Mustafa Kazemi**, pre-signed prescription forms for Careplus Hospice use.

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**Overt Act #4**

On or about and between September 1, 2017 and February 28, 2024, Defendant, **Narendra Malani**, approved hospice recertifications for Careplus patients.

**Overt Act #5**

On or about and between September 1, 2017 and March 12, 2025, Defendant, **Mustafa Kazemi**, approved hospice recertifications for Careplus patients.

**Overt Act #6**

On or about August 10, 2021, Defendant, **Mohammed Abdul Majid Siddiqui** issued and signed a payroll check for Defendant, **Alok Malani**, from a Careplus Hospice Services bank account.

**Overt Act #7**

On or about January 10, 2022, Defendant, **Mohammed Abdul Majid Siddiqui** issued and signed a payroll check for Defendant, **Michael Kazemi**, from a Careplus Hospice Services bank account.

**Overt Act #8**

On or about January 10, 2024, Defendant, **Mohammed Abdul Majid Siddiqui** issued and signed a payroll check for Defendant, **Alok Malani**, from the Careplus Hospice Services bank account.

**Overt Act #9**

On or about September 10, 2024, Defendant, **Mohammed Abdul Majid Siddiqui** issued a payroll check for Defendant, **Michael Kazemi**, from the Careplus Hospice Services bank account.

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**Overt Act #10**

On or about and between September 1, 2017 and September 30, 2024, Defendant, **Shireen Begum** gave Deborah Elias at least one envelope containing cash.

**Overt Act #11**

On or about and between September 1, 2017 and September 30, 2024, Defendant, **Shireen Begum** gave Deborah Elias at least one envelope containing cash.

**Overt Act #12**

On or about and between September 1, 2024 and March 24, 2025, Defendant, **Sarkhan Khoshkarli** gave Deborah Elias at least one envelope containing about \$3,000.00 cash.

**SPECIAL ALLEGATION**

**Penal Code Section § 186.11(a)(2)**

**Aggravated White Collar Crime Enhancement**

**Additional 2, 3, or 5 years State Prison**

Furthermore, as to counts 1, 2, and 3, the offense alleged are related felonies, a material element of which is fraud and 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 (Victim) of, more than five hundred thousand dollars (\$500,000), thus subjecting defendants SHIREEN BEGUM, MUSTAFA MICHAEL KAZEMI, SARKHAN MURAD KOSHKARLI, ALOK MALANI, NARENDRA MALANI, and MOHAMMED ABDUL MAJID SIDDIQUI to the additional punishment provided for in Penal Code sections 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.

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**SPECIAL ALLEGATION**

**Theft Amount over \$100,000 – Penal Code § 1203.045(a)**

It is further alleged that the above offenses in Count 1 and 2 involved theft of over \$100,000, within the meaning of Penal Code Section 1203.045(a).

**SPECIAL ALLEGATION**

**Statute of Limitations for PC §803(c) Offenses**

It is further alleged as to Counts 1, 2, and 3 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) or 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 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)(4): The defendants induced others to participate in the commission of the crimes or occupied a position of leadership or dominance of other participants in their commission.
- CRC §4.421(a)(8): The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
- CRC §4.421(a)(9): The crime involved an attempted or actual taking or damage of great monetary value; and
- CRC §4.421(a)(11): The defendants took advantage of a position of trust or confidence to commit the offense;

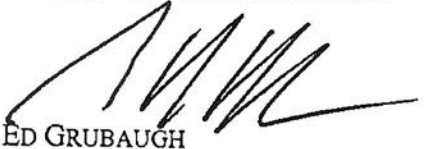
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1 I declare under penalty of perjury, on information and belief, pursuant to the laws of the State  
2 of California, that the foregoing is true and correct.

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5 Dated: June 17, 2025

Respectfully Submitted,

6 ROB BONTA  
Attorney General of California

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ED GRUBAUGH  
Deputy Attorney General  
Attorneys for The People of the State of  
California



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**NOTICE TO ATTORNEY**

The materials accompanying this notice may include information about witnesses which is disclosed to you pursuant to Penal Code Section 1054.2, which reads as follows: "No attorney may disclose or permit to be disclosed to a defendant, members of the defendant's family or anyone else, the personal identifying information of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) Section 1054.1, other than the name of the victim or witness, unless specifically permitted to do so by the Court after a hearing and showing of good cause."



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2 **REQUEST FOR DISCOVERY**

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

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

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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