1	ROB BONTA Attorney General of California	Clork of the Superior Commen	
2	THOMAS BRENNAN Supervising Deputy Attorney General	JUN 11 3 2024	
3	BIANCA YIP Deputy Attorney General	By J. Heimerdinger, ak	
4	State Bar No. 283553	EAST COUNTY DIVISION	
5	Division of Medi-Cal Fraud and Elder Abuse 2329 Gateway Oaks Drive Suite 200		
6	Sacramento, CA 95833-4252 Telephone: (916) 621-1806		
7	E-mail: <u>Bianca. Yip@doj.ca.gov</u> Attorneys for People of the State of California		
8			
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
10	COUNTY OF SAN DIEGO,	EAST COUNTY DIVISION	
11			
12			
13	THE PEOPLE OF THE STATE OF	Case No. CE390707	
14	CALIFORNIA,	FELONY COMPLAINT	
15	Plaintiff,	AG DOCKET No: SD2022302659	
16	<b>V.</b>		
	A TIMA DOMA DO CA DDA CITI	Ct 1: Insurance Fraud. Cal. P.C. §550(a)(6)	
17	AHMAD OMAR SABBAGH,		
18	Defendant.		
19			
20	CHARGE SUMMARY		
21	Count Charge Issue Type Sentence Ra	ange Special Allegations Allegation Effect	
22	1 PC $\S550(a)(6)$ Felony $2y - 3y -$	5y None N/A	
23	·		
24	The People of the State of California her	reby allege that in the County of San Diego, State	
25	of California, and elsewhere, within the State of California, before the making of this criminal		
26	complaint, the above-named defendant, AHMAD OMAR SABBAGH (DOB 04/26/1974),		
27	committed the following criminal offense:		
28	///		

1	COUNT 1	
2	Penal Code section 550, subdivision (a)(6) - a Felony Healthcare Insurance Fraud- 2, 3, or 5 years	
3	On or about, and between, February 14, 2018 and July 31, 2020, defendant AHMAD	
4	OMAR SABBAGH did knowingly make or cause to be made any false or fraudulent claim for	
5	payment of a health care benefit, in violation of Penal Code section 550, subdivision (a)(6), a	
6	felony.	
7		
8	It is further alleged that the claim or amount at issue exceeds \$950.	
9		
10	I declare under penalty of perjury, on information and belief, that the foregoing is true and	
11	correct.	
12	Dated: June 12, 2024 Respectfully Submitted,	
13		
14	ROB BONTA Attorney General of California	
15	Di. Ch	
16	Dungy	
17	BIANCA YIP	
18	Deputy Attorney General Declarant	
19	Attorneys for the People of the State of California	
20	CA DOJ Docket No. SD2022302654	
21	C/1 DOJ DOCKET NO. SD2022502054	
22	Restitution Claimed	
23	[ ] None	
24	[X] \$65,891.69	
25	[ ] To Be Determined	
26		
27		
28		

## REQUEST FOR DISCOVERY

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

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

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