

WARRANT ISSUED *SH*

FILED
OCT 23 PM 12:54
LOS ANGELES COUNTY SUPERIOR COURT

1 KAMALA D. HARRIS,
Attorney General of the State of California
2 BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
SUSAN E. MELTON BARTHOLOMEW
3 Supervising Deputy Attorney General
VINCENT N. BONOTTO
4 Deputy Attorney General
State Bar No. 199282
5 303 North Glenoaks Blvd., Suite 900
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6 Telephone: (818) 556-2905
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7 *Attorneys for Plaintiff*

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES
11

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

Case No.: *BA 435375*

(AG Case No. OR2013112002)

14 Plaintiff,

FELONY COMPLAINT FOR ARREST WARRANT

15 v.

Count 1 PC 487

Count 2 W&I 14107(b)(4)

Count 3 PC 550(b)(2)

16
17 **01 HANAN ISLAM,**
02 ZAKIYYAH ISLAM, and
03 BAYON BEVERLY WASHINGTON,

18 Defendants.
19

20
21 The People of the State of California hereby allege that in the County of Los Angeles, State
22 of California, and before the making or filing of the complaint, the above-mentioned defendant
23 did commit the following crime(s):
24

25 **COUNT 1**

26 **[GRAND THEFT]**

27 From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State
28 of California, defendants **HANAN ISLAM**, and **ZAKIYYAH ISLAM**, unlawfully took from the

1 State of California (Health Care Deposit Fund) property of a value in excess of nine hundred fifty
2 dollars (\$950), in violation of section 487 of the Penal Code, a felony.
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4

5 **COUNT 2**

6 **[PRESENTING FALSE MEDI-CAL CLAIMS]**

7 From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State
8 of California, defendants **HANAN ISLAM, ZAKIYYAH ISLAM, and BAYON BEVERLY**
9 **WASHINGTON**, with intent to defraud, executed a scheme or artifice to defraud the Medi-Cal
10 program, in violation of section 14107, subdivision (b)(4) of the Welfare and Institutions Code, a
11 felony.
12

13 **COUNT 3**

14 **[INSURANCE FRAUD]**

15 From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State
16 of California, defendants **HANAN ISLAM, ZAKIYYAH ISLAM, and BAYON BEVERLY**
17 **WASHINGTON**, assisted, prepared and made a written statement that was intended to be
18 presented to an insurer in connection with, and in support of, a claim and payment pursuant to an
19 insurance policy, knowing that the statement contained false and misleading information
20 concerning a material fact, in violation of section 550(b)(2) of the Penal Code, a felony.
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23 **DECLARATION**

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct.
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28

1 Executed this 23 of October, 2015, in Los Angeles, California.
2
3

4 

5 Samuel Richardson
6 Special Agent
7 California Department of Justice
8 Bureau of Medi-Cal Fraud and Elder Abuse

9 (AG case # OR2013112002)
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IT IS ORDERED that arrest warrants shall issue for the following person, who is to be admitted to bail in the sum of:

Defendant	Scheduled Bail	Bail
HANAN ISLAM	\$100,000	\$ <u>100,000</u> -
ZAKIYYAH ISLAM	\$100,000	\$ <u>100,000</u> -
BAYON BEVERLY WASHINGTON	\$55,000	\$ <u>55,000</u> -

10-23-15
Date



Maral Ingle
Magistrate
Maral Ingle

Agency: Bureau of Medi-Cal Fraud and Elder Abuse
California Department of Justice
Law Enforcement Agency No. 0132
I/O Samuel Richardson, ID #

1 KAMALA D. HARRIS,
Attorney General of the State of California
2 BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
SUSAN E. MELTON BARTHOLOMEW
3 Supervising Deputy Attorney General
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4 Deputy Attorney General
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Burbank, CA 91502-1148
6 Telephone: (818) 556-2905
Fax: (818) 556-2939

7 *Attorneys for Plaintiff*

FILED
Superior Court of California
County of Los Angeles

DEC 01 2015

Sherri R. Carter, Executive Officer/Clerk
By: *[Signature]* Deputy
L. Valdez

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12
13 **THE PEOPLE OF THE STATE OF**
CALIFORNIA,
14
15 Plaintiff,
16
17 v.
18 **01 HANAN ISLAM,**
02 ZAKIYYAH ISLAM, and
03 BAYON BEVERLY WASHINGTON,
19 Defendants.

Case No.: BA435375
(AG Case No. OR2013112002)
FIRST AMENDED
FELONY COMPLAINT
Count 1 PC 487
Count 2 W&I 14107(b)(4)
Count 3 PC 550(b)(2)
Count 4 R&T 19706

20
21 The People of the State of California hereby allege that in the County of Los Angeles, State
22 of California, and before the making or filing of the complaint, the above-mentioned defendant
23 did commit the following crime(s):

24
25 **COUNT 1**
26 **[GRAND THEFT]**

27 From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State
28 of California, defendants **HANAN ISLAM, and ZAKIYYAH ISLAM,** unlawfully took from the

1 State of California (Health Care Deposit Fund) property of a value in excess of nine hundred fifty
2 dollars (\$950), in violation of section 487 of the Penal Code, a felony.
3

4
5 **COUNT 2**
6 **[PRESENTING FALSE MEDI-CAL CLAIMS]**

7 From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State
8 of California, defendants **HANAN ISLAM, ZAKIYYAH ISLAM, and BAYON BEVERLY**
9 **WASHINGTON**, with intent to defraud, executed a scheme or artifice to defraud the Medi-Cal
10 program, in violation of section 14107, subdivision (b)(4) of the Welfare and Institutions Code, a
11 felony.
12

13 **COUNT 3**
14 **[INSURANCE FRAUD]**

15 From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State
16 of California, defendants **HANAN ISLAM, ZAKIYYAH ISLAM, and BAYON BEVERLY**
17 **WASHINGTON**, assisted, prepared and made a written statement that was intended to be
18 presented to an insurer in connection with, and in support of, a claim and payment pursuant to an
19 insurance policy, knowing that the statement contained false and misleading information
20 concerning a material fact, in violation of section 550(b)(2) of the Penal Code, a felony.
21

22 **COUNT 4**
23 **[FAILURE TO FILE TAX RETURN]**

24 From on or about April 15, 2011, through April 15, 2014 in the County of Los Angeles,
25 State of California, defendant **HANAN ISLAM** willfully and unlawfully failed to file any return
26 or to supply any information with intent to evade any tax imposed for the years 2010 through
27 2013, in violation of section 19706 of the Revenue & Taxation Code, a felony.
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DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 1st of December 2015, in Los Angeles, California.



Vincent N. Bonotto
Deputy Attorney General
California Department of Justice

(AG case # OR2013112002)

WARRANT ISSUED *sk*

1 KAMALA D. HARRIS,
Attorney General of the State of California
2 BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
SUSAN E. MELTON BARTHOLOMEW
3 Supervising Deputy Attorney General
VINCENT N. BONOTTO
4 Deputy Attorney General
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6 Telephone: (818) 556-2905
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7 *Attorneys for Plaintiff*

FILED

2015 OCT 20 PM 2 44

CFN
LOS ANGELES SUPERIOR COURT

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9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12
13 THE PEOPLE OF THE STATE OF
CALIFORNIA,

Case No.: *BA435374*

(AG Case No. OR2013112002)

14 *EDWARD NEWBY III* Plaintiff,

FELONY COMPLAINT
FOR ARREST WARRANT

v.

15
16 01 RONNIE STEVEN "RIZZA" ISLAM
17 02 NIMAT ISLAM
18 03 GEORGE EDWARD NEWBY III,

Count 1 W&I 14107(b)(4)
Count 2 PC 550(b)(2)

19 Defendants.

20
21 The People of the State of California hereby allege that in the County of Los Angeles, State
22 of California, and before the making or filing of the complaint, the above-mentioned defendant
23 did commit the following crime(s):

24 COUNT 1

25 [PRESENTING FALSE MEDI-CAL CLAIMS]

26 From on or about March 1, 2012, through September 30, 2013, in the County of Los
27 Angeles, State of California, defendants RONNIE STEVEN "RIZZA" ISLAM, NIMAT
28 ISLAM, and GEORGE EDWARD NEWBY III, with intent to defraud, executed a scheme or

ORIGINAL

FELONY COMPLAINT FOR ARREST WARRANT

1 artifice to defraud the Medi-Cal program, in violation of section 14107, subdivision (b)(4) of the
2 Welfare and Institutions Code, a felony.

3
4 **COUNT 2**


5 **[INSURANCE FRAUD]**

6 From on or about March 1, 2012, through September 30, 2013, in the County of Los
7 Angeles, State of California, defendants **RONNIE STEVEN "RIZZA" ISLAM, NIMAT**
8 **ISLAM**, and **GEORGE EDWARD NEWBY III**, assisted, prepared and made a written
9 statement that was intended to be presented to an insurer in connection with, and in support of, a
10 claim and payment pursuant to an insurance policy, knowing that the statement contained false
11 and misleading information concerning a material fact, in violation of section 550(b)(2) of the
12 Penal Code, a felony.

13 **DECLARATION**

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16
17 Executed this 20 of October, 2015, in Los Angeles, California.

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19
20 
21 Samuel Richardson
22 Special Agent
23 California Department of Justice
24 Bureau of Medi-Cal Fraud and Elder Abuse

25 (AG case # OR2013112002)

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IT IS ORDERED that arrest warrants shall issue for the following person, who is to be admitted to bail in the sum of:

Defendant	Scheduled Bail	Bail
RONNIE STEVEN "RIZZA" ISLAM	\$55,000	\$ 55,000
NIMAT ISLAM	\$55,000	\$ 55,000
GEORGE EDWARD NEWBY III	\$55,000	\$ 55,000

10-20-15
Date

Magistrate
N. SIAO
D-46

Agency: Bureau of Medi-Cal Fraud and Elder Abuse
California Department of Justice
Law Enforcement Agency No. 0132
I/O Samuel Richardson, ID #