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**COUNT 1**

**PRESENTING FALSE MEDI-CAL CLAIMS**

(Welfare and Institutions Code section 14107(b)(4) – 2, 3 or 4 years)

From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State of California, defendants **RONNIE STEVEN “RIZZA” ISLAM, NIMAT ISLAM, HANAN ISLAM, and ZAKIYYAH ISLAM**, with intent to defraud, executed a scheme or artifice to defraud the Medi-Cal program, in violation of section 14107, subdivision (b)(4) of the Welfare and Institutions Code, a felony.

**SPECIAL ALLEGATION**

**AGGRAVATED WHITE COLLAR CRIME**

(1 year enhancement)

It is further alleged that the offenses set forth in Counts 1, 2, and 3 are related felonies, a material element of which is fraud or embezzlement, which defendants, **HANAN ISLAM, and ZAKIYYAH ISLAM** were involved in a pattern of related felony conduct, and that the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000), within the meaning of Penal Code §186.11(a)(1).

**COUNT 2**

**INSURANCE FRAUD**

(Penal Code section 550(b)(2) – 2, 3, or 5 years)

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

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**SPECIAL ALLEGATION**

**AGGRAVATED WHITE COLLAR CRIME**

(1 year enhancement)

It is further alleged that the offenses set forth in Counts 1, 2 and 3 are related felonies, a material element of which is fraud or embezzlement, which defendants, **HANAN ISLAM**, and **ZAKIYYAH ISLAM** were involved in a pattern of related felony conduct, and that the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000), within the meaning of Penal Code §186.11(a)(1).

**COUNT 3**

**GRAND THEFT**

(Penal Code section 487(a) – 16 months, 2, or 3 years)

From on or about July 1, 2010, through July 31, 2013, in the County of Los Angeles, State of California, defendants **HANAN ISLAM**, and **ZAKIYYAH ISLAM**, unlawfully took from the State of California (Health Care Deposit Fund) property of a value in excess of nine hundred fifty dollars (\$950), in violation of section 487 of the Penal Code, a felony.

**SPECIAL ALLEGATION**

**AGGRAVATED WHITE COLLAR CRIME**

(1 year enhancement)

It is further alleged that the offenses set forth in Counts 1, 2 and 3 are related felonies, a material element of which is fraud or embezzlement, which defendants, **HANAN ISLAM**, and **ZAKIYYAH ISLAM** were involved in a pattern of related felony conduct, and that the pattern of related felony conduct involved the taking of more than One Hundred Thousand Dollars (\$100,000), within the meaning of Penal Code §186.11(a)(1).

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COUNT 4

[FAILURE TO FILE TAX RETURN]

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

XAVIER BECERRA  
Attorney General of California



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Vincent N. Bonotto  
Deputy Attorney General  
California Department of Justice