

1 STANISLAUS COUNTY SUPERIOR COURT  
2 STATE OF CALIFORNIA

3 THE PEOPLE OF THE STATE OF CALIFORNIA,

4 vs.

5 LAWRENCE DAVID QUALLS

6 01/10/1944

CR 22012286

7 JOHN FRUTOS MARQUEZ

8 AKA: John Frutas Marquez

9 09/12/1962

CR 22012288

Defendants.

No.

10 State of California )  
County of Stanislaus ) ss.

FILED

NOV 14 2022

CLERK OF THE SUPERIOR COURT  
COUNTY OF STANISLAUS  
BY: *Katelyn Dean*

COMPLAINT - CRIMINAL

DA 19-29

11 GABRIELLE STIDGER, OF THE STANISLAUS COUNTY DISTRICT  
12 ATTORNEY'S OFFICE, complains and alleges, upon information  
13 and belief, that said defendant did commit the following  
14 crimes in the County of Stanislaus, State of California.

15 Count 1

16 On or about and between January 1, 2016 and January 1, 2020,  
17 in the County of Stanislaus, State of California, the crime  
18 of Insurance Fraud in violation of PC550(a)(1), a Felony,  
19 was committed in that LAWRENCE DAVID QUALLS AND JOHN FRUTOS  
20 MARQUEZ did aid, abet, solicit, conspire with another and  
21 did knowingly present and cause to be presented a false and  
22 fraudulent claim for the payment of a loss and injury,  
23 including payment of a loss under a contract of insurance.

24 Count 2

25 On or about and between January 1, 2016 and January 1, 2020,  
26 in the County of Stanislaus, State of California, the crime  
27 of Insurance Fraud in violation of PC550(b)(1), a Felony,  
28 was committed in that LAWRENCE DAVID QUALLS AND JOHN FRUTOS  
MARQUEZ assisted, conspired with another to and presented  
and caused to be presented a written and oral statement as  
part of, and in support of and opposition to, a claim for  
payment and other benefit to an insurance policy, knowing  
that the statement contained false and misleading  
information concerning a material fact.

Count 3

On or about and between January 1, 2016 and January 1, 2020,  
in the County of Stanislaus, State of California, the crime  
of Insurance Fraud in violation of IC1871.4(a)(1), a Felony,

1 was committed in that LAWRENCE DAVID QUALLS AND JOHN FRUTOS  
2 MARQUEZ did unlawfully and knowingly make and cause to be  
3 made a false and fraudulent material statement and material  
4 representation for the purpose of obtaining and denying  
5 compensation, as defined in section 3207 of the Labor Code.

6 Count 4.

7 On or about and between January 1, 2016 and January 1, 2020,  
8 in the County of Stanislaus, State of California, the crime  
9 of Unlawful Client Or Patient Referral in violation of  
10 LC3215, a Felony, was committed in that LAWRENCE DAVID  
11 QUALLS did individually, and through employees and agents,  
12 offer, deliver, receive, and accept a rebate, refund,  
13 commission, preference, patronage, dividend, discount and  
14 other consideration, whether in the form of money or  
15 otherwise, as compensation and inducement for referring  
16 clients and patients to perform and obtain services and  
17 benefits.

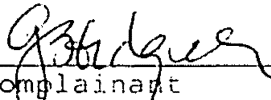
18 Count 5

19 On or about and between January 1, 2016 and January 1, 2020,  
20 in the County of Stanislaus, State of California, the crime  
21 of Having A Financial Interest In Workers' Compensation  
22 Referrals in violation of LC139.32(c), a Misdemeanor, was  
23 committed in that JOHN FRUTOS MARQUEZ was an interested  
24 party, as defined in Labor Code section 139.32(a)(2), other  
25 than a claims administrator or network service provider and  
26 did willfully and unlawfully refer a person for workers'  
27 compensation services provided by another entity, when the  
28 other entity was to be paid for those services pursuant to  
Division 4 of the Labor Code section and the defendant had a  
financial interest in the other entity.

All of which is contrary to law in such cases made and  
provided, and against the peace and dignity of the People of  
the State of California.

I certify under penalty of perjury, at Modesto,  
California, that the foregoing is true and correct.

Dated: November 14, 2022.

  
Complainant  
GABRIELLE S. STIDGER

GSS