INSURANCE COMMISSIONER OF THE STATE OF CALIFORNIA

GRANT AWARD AGREEMENT

Fiscal Year 2019-20 Automobile Insurance Fraud Program

The Insurance Commissioner of the State of California hereby makes an award of funds to **Fresno County**, Office of the District Attorney, in the amount and for the purpose and duration set forth in this grant award.

This grant award consists of this agreement and the application for the grant and made a part hereof. By acceptance of the grant award, the grant award recipient agrees to administer the grant project in accordance with all applicable statutes, regulations and Request-for-Application (RFA).

Duration of Grant: The grant award is for the program period, July 1, 2019 through June 30, 2020.

Purpose of Grant: This grant award is made pursuant to the provisions of California Insurance Code §1872.8 and shall be used solely for the purposes of enhanced investigation and prosecution of automobile insurance fraud and economic car theft cases.

Amount of Grant: The grant award agreed to herein is in the amount of \$405,405. This amount has been determined by the Insurance Commissioner. However, the actual total award amount for the county is contingent on the collection and the authorization for expenditure pursuant to the Government Code §13000 et seq. The grant award shall be distributed pursuant to §1872.8 of the Insurance Code and to the California Code of Regulations Sub-Chapter 9, Article 4, §2698.65.

Official Authorized to Sign for Applicant/Grant Recipient	RICARDO LARA Insurance Commissioner Lenge Mueller
Name: Lisa A. Smittcamp	Name: George Mueller
Title: District Attorney	Title: Deputy Commissioner
Address: 2220 Tulare Street, Suite 1000 Fresno, CA 93721 Date:	Date:

I hereby certify upon my own personal knowledge that budgeted funds are available for the period and purposes of this expenditure.

Crista Hill, Budget Officer, CDI

Date

CALIFORNIA DEPARTMENT OF INSURANCE FRAUD DIVISION



AUTOMOBILE INSURANCE FRAUD PROGRAM

REQUEST FOR APPLICATION FISCAL YEAR 2019-2020

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GRANT APPLICATION CHECKLIST and SEC FISCAL YEAR 2019-2020	UENCE	
THE APPLICATION MUST INCLUDE THE FOLLOWING:		
	YES	<u>NO</u>
GRANT APPLICATION TRANSMITTAL (FORM 02) completed and signed by the district attorney?		
2. PROGRAM CONTACT FORM (FORM 03) completed?		
 Original or certified copy of the BOARD RESOLUTION (FORM 04) included? If NOT, the cover letter must 		
indicate the submission date.		\boxtimes
4. TABLE OF CONTENTS	\boxtimes	
 5. The County Plan includes: a) COUNTY PLAN QUALIFICATIONS (FORM 05) b) STAFF QUALIFICATIONS (FORM 06(A)) 	\boxtimes	
c) ORGANIZATIONAL CHART (FORM 06(B)) d) PROGRAM REPORT (DAR OR FORM 07)	\boxtimes	
e) COUNTY PLAN PROBLEM STATEMENT (FORM 08) f) COUNTY PLAN PROGRAM STRATEGY (FORM 09)		
6. Projected BUDGET (FORMS 10-12) included?	\boxtimes	
a) LINE-ITEM TOTALS VERIFIED?	\boxtimes	
b) PROGRAM BUDGET TOTAL (FORM 12) matches amount requested on FORM 02?		
7. EQUIPMENT LOG (FORM 13) completed and signed?	\boxtimes	
8. JOINT PLAN (Attachment A) completed and signed?	\boxtimes	
 CONFIDENTIAL CASE DESCRIPTIONS (Attachment B) Is all content readable? A partial narrative is not acceptable. 	\boxtimes	
10. ELECTRONIC VERSION (CD/DVD) included?	\boxtimes	

GRANT APPLICATION TRANSMITTAL

AUTOMOBILE INSURANCE FRAUD PROGRAM

Grant Period: July 1, 2019 to June 30, 2020
Office of the District Attorney, County of <u>Fresno</u> , hereby makes application for funds under the Automobile Insurance Fraud Program pursuant to Section 1872.8 of the California Insurance Code.
Contact: Lara Clinton, Deputy District Attorney
Address: 2220 Tulare Street, Suite 1000
Fresno, CA 93721
Telephone: (559) 600-3162
(1) New Funds Being Requested: \$592,740.00
(2) Estimated Carryover Funds: \$\frac{7000.00}{}
Traci Fritzler Stephen Rusconi Assistant District Attorney (3) Program Director (4) Financial Officer
Som FOR:
(5) District Attorney's Signature
Name: Lisa A. Smittcamp STEUE WENGHT, ASST. O.A.
Title: District Attorney
County: Fresno
Address: 2220 Tulare Street, Suite 1000
Fresno, CA 93721
Telephone: (559) 600-3141
Date: 6/28/2019

AUTOMOBILE INSURANCE FRAUD PROGRAM PROGRAM CONTACT FORM FISCAL YEAR 2019-2020

	1.	respor	e contact information for the person with day-to-day operational assibility for the program, who can be contacted for questions regarding ogram.
		a.	Name: Lara Clinton
		b.	Title: Deputy District Attorney
		C.	Address: 2220 Tulare Street, Suite 1000
			Fresno, CA 93721
		d.	E-mail address: _lclinton@fresnocountyca.gov
		e.	Telephone Number: (559) 600-3162 Fax Number: (559) 600-2144
	2.	Provid	e contact information for the District Attorney's Financial Officer.
4		a.	Name: Stephen Rusconi
		b.	Title: Business Manager
		C.	Address: 2220 Tulare Street., Suite 1000
			Fresno, CA 93721
		d.	E-mail address: _srusconi@fresnocountyca.gov
		e.	Telephone Number: <u>(559)</u> 600-4447 Fax Number: <u>(559)</u> 600-4100
	3.	Provid	e contact information for questions regarding data collection/reporting.
		a.	Name: Lara Clinton
		b.	Title: _Deputy District Attorney
		C.	Address: 2220 Tulare Street, Suite 1000
			Fresno, CA 93721
		d.	E-mail address: _lclinton@fresnocountyca.gov
		e.	Telephone Number: (559) 600-3162 Fax Number: (559) 600-2144
and the same	CONTRACTOR DATE	Sea of the season of the seaso	

BOARD OF SUPERVISORS RESOLUTION FISCAL YEAR 2019-2020

Please be advised that a Resolution from the Board of Supervisors authorizing Fresno County to enter into a Grant Award Agreement with the California Department of Insurance will be forwarded no later than December 1, 2019.

COUNTY PLAN: QUALIFICATIONS FISCAL YEAR 2019-2020

QUESTIONS

1. What areas of your automobile insurance fraud operation were successful and why?

The Fresno County District Attorney's Automobile Insurance Fraud Unit has been in operation for over 25 years. The well-qualified, dedicated staff has maintained valuable contacts with other local agencies that specialize in automobile theft and automobile insurance fraud. The Auto Insurance Fraud Unit attends the most relevant training seminars on current fraud trends and how to successfully combat those fraud schemes. The Fresno County District Attorney's Office is committed to staffing the Auto Insurance Fraud Unit with a seasoned prosecutor and investigator. Their experience has allowed for the successful investigation and prosecution of complex cases. The Auto Insurance Fraud Unit strives to prosecute defendants in a diverse yet balanced caseload which reflects the automobile insurance fraud issues unique to Fresno County.

Successes in Fiscal Year 2017-2018

In Fiscal Year 2017-2018, the Auto Insurance Fraud Unit filed 23 cases against 28 defendants. Thirteen were applicant fraud or auto arson cases. The remaining 14 cases were classified as economic car theft. Felony convictions increased from the prior fiscal year. The majority of the criminal cases were resolved only after full restitution was made. The Auto Insurance Fraud Unit collected and dispersed \$35,748.07 in restitution to victims.

Aggressive prosecution of the 28 defendant fraud ring case known as Operation Crash for Cash resulted in significant sentences during this fiscal year. The case was a series of staged and paper collisions using common vehicles, cell phone numbers, and claimants. The total loss was approximately \$130,000. One of the lead conspirators received three years in state prison for recruiting people to make false claims. Another lead conspirator received 365 days in jail for operating a body shop that received two-party checks from insurance companies to repair damage that was actually caused by the staged and paper collisions. Two midlevel conspirators received eight months in jail for participating in four to five fraudulent claims. A low-level participant received four months in jail for his role in one fraudulent claim. Additionally, two low-level conspirators received prison sentences after violating the terms of their probation. In total, the case resulted in felony convictions against eight defendants and misdemeanor convictions against

14 defendants. Restitution in the amount of \$29,552.74 was collected and returned to the victims by the close of the fiscal year.

The close working relationship and open communication between the Auto Insurance Fraud Unit prosecutor and the Central Valley Regional Office prevented one of the lead Operation Crash for Cash conspirators from fleeing the country and the supervision of the probation department. The case detective received information from the Department of Homeland Security that the defendant booked a one-way flight to Moscow. The detective contacted the prosecutor right away. The prosecutor immediately alerted the Fresno County Probation Department who is tasked with supervising the defendant. A probation officer called the defendant that day. The defendant denied any plans to travel. District Attorney and Probation Department personnel searched the defendant's house the next morning and located evidence that she intended to leave the country. After being confronted with the evidence, the defendant confessed she was leaving that day to return to Armenia. Her passport was seized. Shortly after, the defendant's attorney petitioned the court for permission to allow her to go to Armenia so she could work and pay restitution. The prosecutor objected. The court denied the defendant's motion to modify probation to allow her to leave the country. Since then, the defendant has begun making payments towards the \$86,792.12 restitution she was ordered to pay. Quick teamwork prevented the defendant's flight beyond the reach of the court and probation department.

Despite the significant challenges of proving auto arson cases, the Auto Insurance Fraud Unit secured several significant convictions during Fiscal Year 2017-2018 against defendants who burned (or arranged to have burned) their vehicles to collect insurance proceeds. Arson and insurance fraud charges were filed against a defendant accused of having someone burn his vehicle to collect insurance proceeds when he could no longer afford the payments. In an effort to determine who dumped and burned the vehicle, the Auto Insurance Fraud Unit Senior District Attorney Investigator wrote several search warrants to obtain the defendant's cell phone records and records from cellular providers using cell towers near where the vehicle was found. The investigator then compared every phone number associated with the defendant's cellular use history to the numbers identified as connecting through the two cell towers. The also investigator interviewed the defendant and many witnesses. Despite the case being built entirely on circumstantial evidence and the identity of the arsonist never determined, the Auto Insurance Fraud Unit obtained a felony conviction against the insured. The defendant was ordered to serve two years on probation with 90 days jail or alternative work program.

The Auto Insurance Fraud Unit also convicted a Fresno County Sheriff's Deputy who burned a vehicle he owned in order to collect insurance benefits. The defendant pled to a felony violation of Penal Code section 550(b)(1) with the indicated sentence by the court of 90 days on the adult offender work program and felony probation.

The Auto Insurance Fraud Unit resolved an insider fraud case after full payment of restitution. The defendant, while employed as an insurance agent, pocketed \$13,815 in upfront insurance policy premiums and broker fees from car buyers.

The owner of the insurance agency who employed the defendant was extremely appreciative to be made whole with the resolution of the case.

The Auto Insurance Fraud Unit is working closely with Help Eliminate Auto Theft team, the local auto theft task force, to prosecute defendants who are chopping up vehicles and selling them for profit. Chop shop cases are prosecuted by the Auto Insurance Fraud Unit so that an experienced prosecutor can handle these cases. The prosecutor worked with the task force detectives to establish a procedure and streamline the process for obtaining destruction orders from the court. Prior to this, law enforcement agencies were paying unnecessary storage fees for unidentifiable trailers and evidence long after the cases had resolved. The new process avoids wasting taxpayer money on unnecessary storage fees.

Successes in Fiscal Year 2018-2019

In Fiscal Year 2018-2019, the Auto Insurance Fraud Unit filed 14 cases against 16 defendants. Eight cases filed were applicant fraud or auto arson cases. The remaining six cases were economic auto theft cases. The Auto Insurance Fraud Unit secured 14 felony convictions and 9 misdemeanor convictions. The majority of the criminal cases were resolved only after full restitution was made. The Auto Insurance Fraud Unit collected and dispersed \$15,102.74 in restitution to victims.

The Auto Insurance Fraud obtained noteworthy convictions and sentences in the prior fiscal year. The highest profile case was the arrest and sentencing of a Fresno County Sheriff's Deputy who burned his car to collect insurance proceeds. The defendant pled no contest to a felony in the prior fiscal year after a judge promised him 90 days on the Adult Offender Work Program and felony probation. However, he failed to appear in court for sentencing and a bench warrant was issued for his arrest. District Attorney and Probation Department personnel located the defendant months later and served the arrest warrant. Instead of a work program, he served a total of 197 days in custody and was ordered to attend a Veterans Affairs program to address his mental health and substance abuse issues. Media coverage of the shocking arrest and sentencing brought attention to the issue of auto insurance fraud. At the close of the fiscal year, the defendant was taken into custody for a probation violation and was sentenced to serve 365 days in jail with credit for 199 days already served.

After over a month of intensive preparation by the CDI detective and prosecutor for the preliminary hearing for the ringleader of Operation Crash for Cash, the defendant entered a plea on the day of the preliminary hearing. The defendant pled no contest to six felony counts of insurance fraud for a ten year prison exposure. In response to the probation department's recommendation that the defendant receive probation, the prosecutor filed a sentencing brief arguing for the maximum sentence of ten years in prison. The defendant presented letters from multiple doctors indicating he had several complex health issues requiring extensive treatment. The Auto Insurance Fraud Unit senior investigator interviewed the doctors regarding what further treatment was needed and whether it could be provided to the defendant if he was in custody. She also interviewed the jail medical staff to determine whether they would transport the defendant for treatment. On the date of sentencing, the judge reviewed the senior investigator's

reports and found that nothing the defendant had presented warranted a sentence of no custody time. The judge ultimately continued the sentencing on his own motion to get information about whether the defendant's thyroid cancer has returned and metastasized. The judge indicated that he intends to follow the prosecutor's recommendation of that the defendant receive a substantial period of time in prison. At the conclusion of the case, the Central Valley Regional Office and the District Attorney's Office intend to hold a press conference to announce the sentences of the major players in this complex, costly fraud scheme.

The District Attorney's Office undertook an ongoing project to clear the backlog of auto insurance fraud arrest warrants, even on cases dating back to the 1990's. Investigative staff pulled all files with warrants, confirmed the warrants were active, and researched current addresses for the defendants. Staff sent letters to the defendants' last known addresses for the defendants, advising them of the warrant and how to put themselves on calendar to avoid arrest. To date, at least four defendants have calendared their cases; at least one has resolved for a plea despite the significant age of the case. Investigators are preparing to conduct a warrant sweep to arrest those who have not voluntarily surrendered.

2. Specify any unfunded contributions and support (i.e., financial, equipment, personnel, and technology) your county provided to the automobile insurance fraud program.

The Fresno County District Attorney's Office assigns a Budget Analyst, Chief Deputy District Attorney, and a Commander of the Bureau of Investigations to oversee the Auto Insurance Fraud Unit. The District Attorney's Office provided a Program Technician to the Auto Insurance Fraud Unit who handled the day to day operations of the unit until his retirement in 2019. The District Attorney's Office is currently providing a Legal Assistant who handles operations of the Auto Insurance Fraud, Workers' Compensation, and In Home Supportive Services Fraud units.

The Bureau of Investigations provided significant investigative resources during the prior fiscal year to research, develop, and prepare for a planned auto insurance fraud warrant sweep. The Bureau of Investigations also provides assistance with search warrant and arrest warrant service when required.

Due to the sheer volume of auto theft in Fresno County, not all cases can be vertically prosecuted by the Auto Insurance Fraud Unit. Not all auto theft cases will qualify as economic car theft for grant purposes. The District Attorney's Office provides the majority of funding for an attorney tasked with vertically prosecuting career car thieves. The District Attorney's Office also provides several general felony prosecutors who handle auto theft cases not prosecuted by the Auto Insurance Fraud Unit or the career auto thieves prosecutor.

3. Detail and explain the turnover or continuity of personnel assigned to your automobile insurance fraud program. Include any rotational policies your county may have.

The Fresno County District Attorney's Office has continually staffed the Auto Insurance Fraud Unit with dedicated and experienced investigators and prosecutors. These prosecutors and investigators are given the tools and resources they need to develop the specific expertise to effectively investigate and prosecute automobile insurance fraud, including complex cases that require additional time. The District Attorney's Office prioritizes continuity of staff in specialty assignments whenever possible.

The Auto Insurance Fraud Unit was staffed by Deputy District Attorney Lara Clinton during the past fiscal year. DDA Clinton is a seasoned prosecutor with significant trial experience. DDA Clinton has been a prosecutor for 17 years and is certified as a Criminal Law Specialist. The California State Bar Association designates individuals who meet certain criteria and pass a written examination as specialists in their designated fields. Only 333 California attorneys are designated as Criminal Law Specialists. DDA Clinton also has experience training police officers formally and informally on best practices for conducting investigations.

DDA Clinton joined the Auto Insurance Fraud Unit in March 2017. Since joining the Auto Insurance Fraud Unit, she has taken advantage of several training opportunities specific to Auto Insurance Fraud. DDA Clinton attended the California District Attorneys' Association fraud symposiums in 2017 and 2018, Anti-Fraud Alliance conferences in 2017 and 2019, and California District Attorneys' Association felony sentencing training in May 2018. DDA Clinton participates in bimonthly Western State Auto Theft Investigator trainings, monthly auto theft roundtable meetings, and participates in bimonthly CDI-sponsored Special Investigations Unit roundtables, as her court schedule permits.

Senior District Attorney Investigator Amarjeet Gill was assigned to the Auto Insurance Fraud Unit in June 2018. Senior Investigator Gill has 23 years of law enforcement experience as a District Attorney Investigator, having joined the Fresno County District Attorney's Office in February 1989. She has received extensive training regarding fraud investigations and white collar crime. She has experience investigating many types of white collar crime, including welfare fraud, childcare fraud, real estate fraud, in home supportive services fraud, and consumer fraud. She earned a certificate in Criminal Investigation from the Robert Presley Institute in 2005.

Senior Investigator Gill has attended the California District Attorneys' Association fraud symposiums almost every year since 2005. She attended the Anti-Fraud Alliance conference in April 2019. She is a member of Western State Auto Theft Investigators organization and regularly attends their trainings and participates in bimonthly CDI-sponsored Special Investigations Unit roundtables.

4. List the governmental agencies you have worked with to develop potential automobile insurance fraud cases.

The Auto Insurance Fraud Unit works with all local law enforcement agencies including CDI, the California Highway Patrol Investigative Services Unit, the Help Eliminate Auto Theft Team (comprised of CHP officers, a DMV Investigator, and

local law enforcement); Fresno Police Department's Career Criminal Auto Theft Team; Fresno County's Agricultural Crimes Task Force (a specialized team consisting of Fresno County Deputy Sheriffs and a CHP officer); Bureau of Automotive Repair; and California Department of Motor Vehicles Investigations. Staff also works with the Federal Bureau of Investigation, Department of Social Services, and other local police agencies from the surrounding communities when investigating cases.

5. Were any frozen assets <u>distributed</u> in the current reporting period? (Assets may have been frozen in previous years.) If yes, please describe. If no, state none.

None.

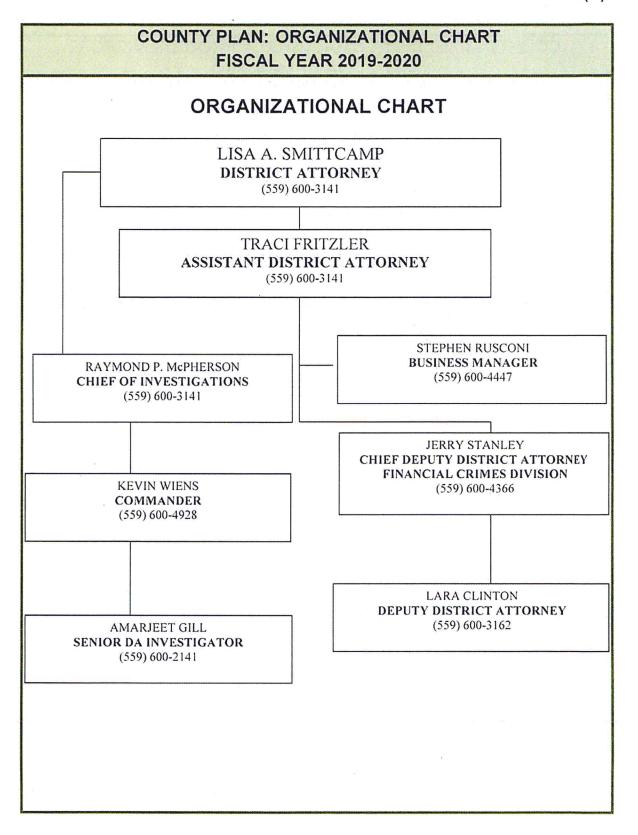
COUNTY PLAN: STAFFING FISCAL YEAR 2019-2020

COUNTY OF FRESNO

Prosecutors	% Time	Time With Program Start Date/End Date
Lara Clinton	100	03/27/17 - present
1		
		1
		_

COUNTY OF FRESNO

100	06/05/17 - 06/29/18 06/29/18 - present
100	06/29/18 - present
	3



COUNTY PLAN: DISTRICT ATTORNEY PROGRAM REPORT FISCAL YEAR 2019-2020

DAR (FORM 07) is submitted online

STATISTICAL INFORMATION WILL BE CAPTURED FROM JULY 1, 2018 TO JUNE 15, 2019

To access the DAR webpage on the CDI website, click on the following link or copy the URL into your browser.

http://www.insurance.ca.gov/0300-fraud/0100-fraud-division-overview/10-anti-fraud-prog/dareporting.cfm

COUNTY PLAN: PROBLEM STATEMENT FISCAL YEAR 2019-2020

PROBLEM STATEMENT

CDI received and reviewed 232 Suspected Auto Fraud Claims in Fresno during Fiscal Year 2018-2019. Applicant fraud, vehicle arsons, fraud rings, economic car theft, and medical provider fraud continue to greatly impact the residents of Fresno County.

Applicant Fraud

Fresno County is the tenth largest county in California based on its estimated population of 1,007,229 (as of January 2018). The population of Fresno increased 1.2 percent from 2017. Unfortunately, jobs have not kept up with the population increase. Fresno County's unemployment rate in May 2019 was 6.4 percent. While California has closed the gap in its unemployment rate (3.5 percent) versus the nation (3.4 percent), Fresno County's unemployment rate (7.7 percent in April 2019 and 6.4 percent in May 2019) is nearly double that of the national average.

From 2013 to 2017, the median household income in Fresno was \$48,730, significantly below the \$67,169 median household income of most Californians. In Fresno County, 21.1 percent of the population lives below the poverty line. The rate of persons living in poverty in Fresno County is almost double the poverty rate of the nation (12.3 percent) and is significantly higher than the California poverty rate of 13.3 percent.

Fresno County's economy is highly dependent on agriculture. California suffered a severe multi-year drought which caused Fresno County farmers to allow thousands of acres of farmland to go fallow. Despite increased precipitation, the effects of the drought persist in Fresno. In 2017, Governor Brown terminated the 2014 Drought State of Emergency for all counties in California except Fresno and three other counties, two of which adjoin Fresno. It has been reported that the drought has ended statewide, although the State of Emergency has not yet been lifted for Fresno County. However, fallowed farmland does not become productive overnight and it will take time for Fresno's agricultural economy to recover.

These issues all factor into families foregoing automobile insurance, foregoing repairs to their vehicles, falling behind on their auto loan payments, and ultimately resorting to insurance fraud when faced with an auto-related dilemma.

There are also many uninsured, unlicensed drivers in Fresno County. Typically they obtain older, less expensive vehicles which are more easily stolen for parts, thus creating an environment for increased auto insurance fraud.

Vehicle Arsons

Vehicle arsons are commonly committed for insurance fraud purposes, but they generally go undetected. The insured has the vehicle burned, which is then deemed a total loss by the insurance company. Vehicle arsons are very difficult crimes to prove and are very labor intensive to investigate. Due to lack of investigative resources to properly examine the vehicle at the time of recovery, valuable evidence is lost. When fraud is ultimately suspected, it is too late to conduct the proper investigation. Often the vehicle is recovered long after the arson has been committed due to Fresno County's vast farmlands where vehicles are easily disposed of with no witnesses.

Fraud Rings

Local auto theft task forces focus on businesses, both legitimate and illegitimate, that promote economic car theft and auto insurance fraud by dealing in stolen vehicles, stolen vehicle parts, and bill insurance companies for work not performed and parts not supplied to consumers. These businesses include metal recyclers, auto body repair shops, and auto parts shops. The Auto Insurance Fraud Unit has filed several cases involving fraud rings comprised of the owners, employees, and customers of these businesses. The Bureau of Automotive Repair has submitted several cases where auto repair shops are committing fraud by billing insurance companies for unperformed work on the customers' vehicles.

Economic Car Theft

Fresno County has one of the highest auto theft rates in the nation. Fresno has long been plagued by high auto theft statistics. According to statistics supplied by the California Highway Patrol for 2018, Fresno County ranked number 12 out of the 58 counties for the most vehicles stolen. Additionally, the City of Fresno Police Department was in the top 10 law enforcement agencies reporting the incidence of vehicle thefts in 2018.

Despite efforts to educate the public, many drivers continue to leave their cars running while unattended, to cool down or warm up due to Fresno's unusually hot summer days and cold winter mornings. This allows opportunistic car thieves to steal vehicles that may not otherwise be stolen due to advanced technology.

A large part of Fresno's economic car theft problem revolves around chop shops. The local auto theft task forces investigate many cases where suspects are stealing vehicles, including older vehicles, and stripping them for parts. Many do so for profit, while others use the parts for their own vehicles. Investigations of chop shops have uncovered numerous owner give-up cases, as well as stolen vehicles.

The various law enforcement agencies' auto theft task forces are fighting auto theft crime every day. The Auto Insurance Fraud Unit receives numerous cases from these task forces every year. The task forces' efforts and aggressive prosecution by prosecutors specializing in auto theft cases are making an impact. Auto thefts in

Fresno County dropped 7.6 percent in 2018 from 2017, as compared to the statewide reduction of 6 percent. Unfortunately, during the same time period, 5.9 percent fewer vehicles were recovered in Fresno County in comparison to the statewide rate of 5.2 percent fewer vehicles. It is vital to continue funding experienced prosecutors and investigators dedicated to insurance fraud and economic car theft to provide for aggressive, specialized prosecution.

Medical Provider Fraud

Medical providers who commit billing fraud commonly cross over from the workers' compensation insurance fraud arena into the auto insurance fraud arena. The Auto Insurance Fraud Unit recognizes the importance of investigating medical provider fraud and is committed to investigating these cases. The Auto Insurance Fraud Unit continues to work closely with all local, state, and federal law enforcement agencies to combat medical provider fraud in Fresno County.

COUNTY PLAN: PROGRAM STRATEGY FISCAL YEAR 2019-2020

PROGRAM STRATEGY

1. Explain how your county plans to resolve the problem described in your problem statement. Include improvements in your program.

Fresno County faces many challenges, including increased auto insurance fraud in applicant fraud, fraud rings, economic car theft, and medical provider fraud. The Auto Insurance Fraud Unit is working diligently to help law enforcement combat these areas of auto insurance fraud every day. The Auto Insurance Fraud Unit strives to and has been successful in maintaining a balanced caseload.

Applicant Fraud

The Auto Insurance Fraud Unit maintains excellent open communication with our various referral sources. Staff will continue to network and coordinate training with the Special Investigations Unit managers for the auto insurance industry. These trainings for claims examiners focus on applicant fraud red flags and evidentiary requirements for successful criminal prosecutions as well as obtaining feedback on how we can better assist in case evaluations. The Auto Insurance Fraud Unit continues to assist CDI in joint investigations as needed.

Fraud Rings

The Auto Insurance Fraud Unit investigates all fraud ring referrals, including those involving a large number of suspects and incidents. The Auto Insurance Fraud Unit is concluding the prosecution of a 28 defendant fraud ring that was investigated by CDI. The Auto Insurance Fraud Unit will continue to network with insurance companies in identifying and investigating all suspected fraud rings.

Economic Car Theft

The Auto Insurance Fraud Unit will continue to work closely with local law enforcement agencies, CDI, and Special Investigations Unit staff to prosecute both chop shop cases and career auto thieves as efficiently as possible.

Medical Provider Fraud

The Auto Insurance Fraud Unit will work with the Workers' Compensation Insurance Fraud Unit, CDI, and the National Insurance Crime Bureau, as well as other law enforcement agencies in investigating and combating medical provider fraud. Combating medical provider fraud is a priority due to its vast impact on the cost of auto insurance for the consumer. Reducing medical provider fraud reduces insurance costs for consumers.

Auto Insurance Fraud Unit Design

Fresno County is requesting sufficient funding to assign the following full-time positions: one Deputy District Attorney, one Senior District Attorney Investigator, and one half-time Senior Legal Assistant.

It is essential to have a Senior District Attorney Investigator who can review referrals closed by CDI due to insufficient resources. The Fresno County District Attorney's Office did not receive funding for the Urban Auto Grant for the last grant cycle. The Senior Investigator will also be available to investigate cases that would normally be considered Urban Auto Fraud cases.

The Senior District Attorney Investigator will conduct all requested pre-trial follow-up investigations, serve subpoenas, prepare and execute search warrants, locate, transport and prepare witnesses/victims, maintain evidence, and perform other required tasks to support the prosecutor.

The prosecutor will ensure cases, which are determined to have a significant impact on the program's mission, are successfully prosecuted. The prosecutor will appear in court for Auto Insurance Fraud Unit cases, including Mandatory Supervised Release and probation violations and restitution hearings.

The Auto Insurance Fraud Unit Senior Legal Assistant will maintain the database, restitution payments, and help in the grant application process. This individual will prepare all court documents, correspondence, and provide any other support for Auto Insurance Fraud Unit staff as necessary.

The Auto Insurance Unit continues to collect and track restitution ordered by the court. With the database, staff can collect restitution, forward payments to victims, and maintain contact with those defendants who fail to make restitution payments quickly and efficiently.

The Auto Insurance Fraud Unit is responsible for outreach presentations to law enforcement and insurance industry personnel. The staff regularly meets with local law enforcement and private carriers as part of their outreach efforts to discuss potential referrals.

Program Improvement Goals for Fiscal Year 2019-2020

The Auto Insurance Fraud Unit will work toward filing high impact cases such as sophisticated fraud rings that will provide the greatest deterrent effect. With the rise in arson-related insurance fraud, the Auto Insurance Fraud Unit will aggressively pursue these types of cases as well as medical provider fraud cases.

The Senior District Attorney Investigator will continue to cooperate with CDI to coordinate investigations and pursue complex cases without duplicating efforts. The Auto Insurance Fraud Unit will coordinate with the Workers' Compensation Insurance Fraud Unit in the investigation of medical mills in Fresno County.

2. What are your plans to meet the announced goals of the Insurance Commissioner? A copy of the goals have been provided for your reference.

 If these goals are not realistic for your county, please state why they are not, and what goals you can achieve. What is your strategic plan to accomplish the goals?

The Auto Insurance Fraud Unit will continue to actively pursue cases with high fiscal impact. Staff is committed to reinforcing the message that automobile insurance fraud will not be tolerated in Fresno County.

The Auto Insurance Fraud Unit is committed to providing continuity of staff. Continuity will allow expertise to grow and improve the performance of the Auto Insurance Fraud Unit. This improvement will assist in addressing the rampant fraud problem in Fresno County and thereby reduce the overall cost to insurance companies and the public.

The Auto Insurance Fraud Unit will continue to provide outreach to the law enforcement community, the insurance industry, and the public. Staff remains committed to assisting with case evaluations and training. The Auto Insurance Fraud Unit will continue to participate in the Special Investigations Unit roundtables, Western State Auto Theft Investigators meetings, and local law enforcement task forces.

3. What goals do you have that require more than a single year to accomplish?

Establishing and maintaining open communication with law enforcement agencies and insurance companies is an ongoing goal. The successful prosecution of complex cases often takes more than a single year to investigate and prosecute.

4. Training and Outreach

Training received during Fiscal Year 2017-2018

Lara Clinton, Deputy District Attorney

- California District Attorneys Association, Fraud Symposium, October 2017
- California District Attorneys Association, Felony Sentencing Seminar, May 2018
- Western States Auto Theft Investigators, Smart Water training, April 2018

Jarrod Amey, Senior District Attorney Investigator

- California District Attorneys Association Fraud Symposium, October 2017
- Anti-Fraud Alliance 29th Annual Anti-Fraud Conference, April 2018
- Western States Auto Theft Investigators, Smart Water training, April 2018

Training received during Fiscal Year 2018-2019

Lara Clinton, Deputy District Attorney

- California District Attorneys Association Fraud Symposium, October 2018
- California District Attorneys Association, Legal Update training, October 2018
- CDI training, Special Investigations Unit Compliance training, November 2018

Anti-Fraud Alliance 30th Annual Anti-Fraud Conference, April 2019

Amarjeet Gill, Senior District Attorney Investigator

- California District Attorneys Association Fraud Symposium, October 2018
- Anti-Fraud Alliance 30th Annual Anti-Fraud Conference, April 2019

Outreach provided in Fiscal Year 2018-2019

Auto Insurance Fraud Unit personnel provided informal training to local law enforcement agencies, participated in bi-monthly roundtable meetings with local Special Investigations Unit personnel and law enforcement, attended monthly Help Eliminate Auto Theft team meetings, and conferred with Special Investigations Unit personnel on the necessary elements to successfully prosecute a case in court, including what is needed to lay the foundation for evidence to be admitted in court at preliminary hearings and trials.

Training/Outreach planned for Fiscal Year 2019-2020

The assigned prosecutor and investigator will attend the California District Attorneys Association Fraud Symposium in the fall and the Anti-Fraud Alliance Annual Anti-Fraud in the spring.

The Auto Insurance Fraud Unit prosecutor and investigator will create and give training for the smaller police agencies in Fresno County. This will benefit agencies which may not have specialized auto theft units or arson detectives.

The Auto Insurance Fraud Unit staff will meet with Special Investigations Unit investigators on a regular basis to provide training and instruction on the requirements for a successful referral for prosecution. The prosecutor will be available for both formal and informal training and presentations as opportunities arise.

5. Describe the county's efforts and the district attorney's plan to obtain restitution and fines imposed by the court to the Automobile Fraud Account.

To enhance the collection of restitution, Auto Insurance Fraud Unit staff contacts victims to determine the amount of restitution and to have the amount fixed at the time of sentencing. Usually, the prosecutor's offer to settle a case is contingent on the defendant paying the entire amount of restitution upfront. If the entire amount of restitution has not been collected upfront, the courts will order defendants to pay restitution through the Auto Insurance Fraud Unit. The prosecutor provides instructions on the record to the defendants detailing how and where to make payments.

The Senior Legal Assistant will monitor restitution payments and will send reminder letters to those defendants that fail to make a scheduled restitution payment. Where restitution is not being made, the prosecutor will actively seek judicial enforcement in probation violation hearings.

The Auto Insurance Fraud Unit collects restitution payments directly from the defendants rather than through the court, and forwards these payments to the victims.

The Auto Insurance Fraud Unit calendars violation of probation hearings on its own motion to have the court address willful violations of the Court's restitution orders.

 Identify the performance objectives that the county would consider attainable and would have a significant impact in reducing automobile insurance fraud. Project a count you expect to actively investigate. Do not include cases that are open and assigned but have little or no expectation of being worked.

Projection for FY 2019-2020:

- a. 60 new investigations will be opened and worked during FY 2019-2020
- b. 45 new prosecutions will be initiated during FY 2019-2020

Prior year's projection from FY 2018-2019 submitted RFA:

- c. 60 new investigations will be initiated during FY 2018-2019
- d. 45 new prosecutions will be initiated during FY 2018-2019
- 7. If you are asking for an increase over the amount of grant funds awarded last fiscal year, please provide a brief description of how you plan to utilize the additional funds.

	2 \$ <u>41,228</u> -2019 FY 2019-2020 VARD Increase Requested
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Utilization Plan:

An increase in funds is requested to pay salary and benefit increases for Auto Insurance Unit fraud staff and enable continuity within the program.

AUTOMOBILE INSURANCE FRAUD PROGRAM BUDGET: PERSONNEL SERVICES FISCAL YEAR 2019-2020

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	UIN					SINO

A. PERSONNEL SERVICES: Salar	ies and Employee Benefits	C	OST
			ALL CONTROL OF THE PARTY OF THE
(1) DEPUTY DISTRICT ATTORNEY:			
This individual devotes 100% of time to this pr	rogram.	age of the second	
		s	138,623
Annual salary:	138,623	3	100,023
Benefits:		NO.	
Retirement: (138,623 @ .6480)	89,828	OWER	
OASDI: (138,623	40.050		
.0145)+(132,900.062)	10,250		
Health Ins- Annual:	11,510		
Unemployment-Annual:	98		
Workers Comp-Annual:	672		
Admin Fee- Annual:	111 .		112,469
(1) SENIOR DISTRICT ATTORNEY INVE	STIGATOR:	***	
This individual devotes 100% of time to this pr			
Annual salary:	100,736		
Benefits:	100,100	1	
Retirement: (100,736 @ .9218)	92,858		100,73
OASDI: (100,736 *.0765)	7,706	1	
Health Ins-Annual:	11,641	1	
Unemployment-Annual:	98	1	
Workers Comp-Annual:	672		
Admin Fee- Annual:	111		
		4.	
			113,08
(E) CENIOD I FOAL ACCISTANT:			
(.5) SENIOR LEGAL ASSISTANT: This individual devotes 50% of time to this pro	ogram.		
Annual salary: (49,892 * 50%)	24,946		24,94
Benefits:			
Retirement: (49,892 @ .6480) * 50%	16,165		
OASDI: (49,892 *.0765) * 50%	1,908		
Health Ins-Annual: (11,510* 50%)	5,755	4	
Unemployment-Annual: (98 * 50%)	49		
Workers Comp-Annual: (672 * 50%)	336		24,26
Admin Fee- Annual: (111 * 50%)	56		-500000 * ******************************

Membership Dues: 0 SUMMARY: Salaries Benefits Membership Dues	ž 9	\$264,305 249,824 380		380
TOTAL	F	514,509		2 4
			e e e	
				-
		v		
A. PERSONNE	I SERVI	ICES TO)TAI	\$ 514,509

AUTOMOBILE INSURANCE FRAUD PROGRAM PROGRAM BUDGET: OPERATING EXPENSES FISCAL YEAR 2019-2020

COUNTY NAME: FRESNO	
B. OPERATING EXPENSES	COST
MOBILE COMMUNICATIONS: 24/7 radio network access (\$87.50 * 1 radio * 12 mos.)	\$ 1,050
LIABILITY INSURANCE: rates set by County Risk Management	100
OFFICE EXPENSE: routine office supplies	2,000
POSTAGE: costs of mailing correspondence, legal documents, and subpoenas	250
<u>DATA PROCESSING</u> : computer network access (connections, air cards, file storage), phone network and hardware, cellular voice and date, and software license renewals	11,500
PROFESSIONAL & SPECIALIZED SERVICES: costs may include records management, copies of vital records and court proceedings, and prorated cost of annual audit	2,000
PUBLICATIONS: costs for required attorney publication materials	400
RENTS & LEASES - BUILDINGS: prorated costs of office space and facility maintenance	13,500
TRANSPORTATION, TRAVEL & EDUCATION: transportation, mileage, meals, registration fees for program related in-state travel/training	6,000
GARAGE CHARGES-FLEET: program vehicle operation and maintenance costs	15,000
INDIRECT COSTS: (10% * Salaries (\$264,305)	26,431
	*
B. OPERATING EXPENSE TOTAL	\$ 78,231

PROGRAM BUDGET: EQUIPMENT FISCAL YEAR 2019-2020

FISCAL YEAR 2019-2020					
COUNTY NAME: FRESNO					
C. EQUIPMENT	COST				
	S The Section				
C. EQUIPMENT TOTAL	\$ 0				
D. PROGRAM BUDGET TOTAL	\$ 592,740				

PRIOR FISCAL YEAR 2018-2019

PRIOR FISCAL TEAR 2018-2019							
COUNTY NAME: FRESNO							
Equipment Ordered	Equipment Cost	Date Ordered	Date Received	Serial Number	Equipment Tag Number		
Vehicle	\$31,550	05/09/19	05/15/19	2FMPK3G 90KBB179 93	91709		
Laptop-Dell	\$1,861	03/04/19	04/21/19	DLNNXT2	DA573228L		
Surveillance Camera	\$12,580	04/15/19	05/03/19	HD Camera 2282	In Process		
Portable Radio	\$5,070	03/15/19	In Process	-	-		
Vehicle Equipment	\$6,178	05/09/19	06/14/19	N/A	-		
-							
5							
Rows can be ins	erted as neede	ed.		L	L		
☐ No equipm	nent purcha	sed.					
I certify this repo	rt is accurate a	and in accord	ance with the	Grant guidelin	es.		
Name: Lara C Signature:	linton		Title: <u>Depu</u> Date: <u>07/0</u>	uty District Atto 11/2019	orney		

ATTACHMENT "A" JOINT PLAN

ATTACHMENT A JOINT PLAN

1. STATEMENT OF GOALS

The purpose of this Joint Plan is to create a framework by which the Fresno County District Attorney's Office Automobile Insurance Fraud Unit (hereinafter referred to as the Fraud Unit) and the Central Valley Regional Office of the Department of Insurance (hereinafter referred to as CDI) will effectively work together to combat automobile insurance fraud. Given the limited resources available to investigate fraud, it is imperative to not duplicate efforts. It is also essential to use the resources of both agencies to their fullest potential. For example, if a case crosses county lines, the Fraud Unit will turn to CDI for assistance.

2. RECEIPT AND ASSIGNMENT OF CASES

CDI and the Fraud Unit will deconflict upon assignment of investigations to ensure there is no duplication of investigative efforts. If it is determined that CDI will conduct the investigation, the Fraud Unit will assign a prosecutor to the case to serve as a legal resource for CDI detectives. The assigned attorney and CDI detective will develop a litigation plan. This action is consistent with and supports the philosophy of vertical prosecution. They will work together to determine the charges to be filed and interviews to be conducted. During the initial meeting, timelines will be established for the completion of the investigation and priorities will also be set. The Fraud Unit will be apprised of all aspects of CDI's investigation.

3. INVESTIGATIONS

By working together at the outset of a case, and by sharing fraud referrals on a monthly basis, there will be no duplication of effort. Open communication will exist between both offices, which is the key to investigating the cases as expediently and efficiently as possible.

Vertical prosecution shall be used for all cases investigated. Vertical prosecution means the case detective from CDI or the Fraud Unit will communicate with the assigned prosecutor when the case is assigned for investigation. The assigned prosecutor and detective will meet in person or via telephone prior to starting the investigation. They will discuss the viability of the case, the investigative plan, and schedule meetings and case updates throughout the investigation.

(a) Pursuant to the above provision, and to maximize the efficient and effective expenditure of resources, it is expected that each party will conduct its investigations independently in most cases. However, it is understood and agreed that either party will provide assistance to the other upon request in any investigation where such assistance is needed. This could include serving search warrants, interviewing witnesses, making arrests, etc.

- (b) Joint investigation may be undertaken in cases where the parties determine it is beneficial to combine resources to achieve the most efficient and effective result. This will be determined on a case-by-case basis. CDI detective(s) and the assigned prosecutor shall communicate at regular intervals as necessary, but no less than one time a month, for the duration of a joint investigation and resulting prosecution.
- (c) It is the intent of this joint investigative plan to avoid duplication of investigative efforts by maintaining regular communication to discuss caseloads and share information concerning current investigations.
- (d) Ongoing investigations will be discussed at each meeting or more often as the matter dictates. A prosecutor will be assigned to each investigation to assist in any legal issues and to ensure that all elements of the case are present to meet charging requirements. This teamwork will reduce unnecessary investigative work and ensure that an investigation is terminated at the earliest possible time if it becomes apparent that no further amount of work would result in a prosecution.
- (e) The Chief of the Fraud Unit or his designee will be available to meet with the CDI detective at any time during the investigation of a case when so requested by the detective to discuss any aspect of the case.
- (f) It is the intent of the parties that by maintaining regular communication and adhering to agreed-upon plans and procedures, the completed investigation will result in the filing of criminal charges and a successful prosecution. At the same time, however, it is understood that not every case that is investigated will result in a prosecution. This can happen when the evidence does not develop as expected, material witnesses are no longer available, the case lacks jury appeal, the reasonable likelihood of conviction is minimal, or other unforeseen circumstances develop. The parties will take all possible steps to avoid such situations, as it is not desirable to expend investigative resources on cases that are not prosecuted in court.

When it becomes necessary, the Supervising Attorney or his designee will provide authorization to CDI to conduct surreptitious recordings pursuant to Penal Code Section 633.

The CDI Captain, or the Captain's designee, and the Supervising Attorney will meet quarterly to discuss any issues or problems with the joint investigation of cases.

4. UNDERCOVER OPERATIONS

In the event that an undercover operation occurs during this grant period, both the CDI Captain, or her designee and the Supervising Attorney will meet to develop a litigation plan which will identify the direction of the investigation, address relative investigative issues, define the responsibilities of both agencies and provide a method to resolve disagreements.

Either party may decide to conduct an undercover operation in a particular case using its own personnel and resources. In a situation where the Fraud Division

conducts its own independent undercover investigation in Fresno County, the detective will consult the assigned prosecutor on the case consistent with vertical prosecution.

In a case where there will be a "joint" undercover investigation, there will be a joint operational plan prepared prior to the start of the investigation, which outlines and specifies the goals and objectives of the investigation, as well as the duties and responsibilities, including personnel and financial responsibilities, of each of the parties in the investigation.

CASE FILING REQUIREMENTS

Cases presented to the Fraud Unit for filing will contain sufficient evidence to prove guilt beyond a reasonable doubt. This will include verification that witnesses are available and willing to testify, and contain all available documentation needed to prove the fraud.

When submitting a case for prosecution, the CDI Detective is to present a complete investigation package. This will include the following:

- (a) A brief summary of the case,
- (b) A report which outlines the offense alleged to have been committed and the details of the investigation,
- (c) A completed District Attorney Prosecution Request Form,
- (d) Evidence gathered to prove the charges, including the identification of available witnesses and supporting documentation, witness interviews pursuant to Proposition 115, criminal history of all suspects, and a complete claim file if a claim was made,
- (e) If interpreters were used to interview witnesses, they will be identified and interviewed if possible,
- (f) A letter on company letterhead detailing restitution and investigative costs and where restitution should be mailed, or a written declination of restitution and investigative costs, and
- (g) In cases alleging a false statement or misrepresentation, there must be identified evidence to show that the alleged false statement or misrepresentation is material to the claim

The prosecutor shall notify the case detective as soon as practical if additional follow up investigation is warranted on the case. Ongoing discussions between the detective and prosecutor will determine what additional investigation is needed. Every effort shall be made by the parties to complete the investigation as soon as practical.

The assigned prosecutor shall file criminal charges only if all of the following requirements are satisfied:

- (a) Based upon a complete investigation and a thorough consideration of all pertinent information readily available, the prosecutor is satisfied that the evidence shows the accused is guilty of the crime to be charges,
- (b) There is sufficient legally admissible evidence of a corpus delicti,

- (c) There is sufficient legally admissible evidence of the identity of the perpetrator of the crime,
- (d) The prosecutor has considered the probability of a conviction by an objective fact-finder hearing the admissible evidence and has considered the evidence necessary to satisfy the legal proof of a criminal case, and
- (e) The admissible evidence is of such convincing force that it would warrant conviction of the crime charged by a reasonable and objective fact-finder after hearing all the evidence available at the time of charging and after hearing the most plausible, reasonably foreseeable defenses that could be raised under the evidence presented.

The Fraud Unit will provide CDI with a filing decision in writing within 30 days of the case submission. If after a complete review of the case the prosecutor decides not to file criminal charges, the prosecutor will contact and consult with the Fraud Division to discuss the reasons for not filing the case. Both parties understand that not every case may result in criminal prosecution. A case may be declined for prosecution when the evidence does not develop as expected, material witnesses are no longer available, the reasonable likelihood of a conviction is minimal and the case lacks jury appeal, or other unforeseen circumstances develop. The parties will attempt to avoid such situations, so as not to expend investigative resources on cases that will not result in a criminal prosecution. If a case has been formally submitted for filing and the prosecutor declines to prosecute, a formal rejection notice either in letter format or via e-mail outlining the reasons why the case is being declined will be sent to the Central Valley Regional Office.

6. TRAINING

CDI and the Fraud Unit will continue to work together to educate the community on ways to combat fraud. Any requests for training received by CDI will be communicated to the Fraud Unit and vice versa.

7. PROBLEM RESOLUTION

With CDI and the Fraud Unit working in a "team concept" it will be easier to resolve problems in an expedient manner. This will also reduce any potential breakdown in communication between offices.

In the event a conflict develops between the agencies, using the open lines of communication established, the agencies will seek resolution at the lowest level possible. If a resolution cannot be achieved at this level, the immediate supervisors shall meet to seek resolution. It is anticipated that most, if not all, conflicts will be resolved by this step, If a conflict persists, then the Captain of CDI, and the Chief Attorney for the Fraud Unit shall meet and confer.

8. OTHER

Both CDI and the Fraud Unit will assist each other in the following ways:

- (a) Storing evidence, based on availability,
- (b) Sharing specialized equipment,
- (c) The service of search warrants, arrest warrants and/or subpoenas, and
- (d) In any other way necessary to accomplish our common goal of deterring auto insurance fraud.

9. CONCLUSION

The Fraud Unit and CDI agree to work together to investigate and prosecute those who commit auto insurance fraud in Fresno County by working high impact cases while at the same time maintaining a balanced caseload. Both agencies agree that anti-fraud efforts must be conducted in a cost effective and efficient manner with professionalism, productivity and effectiveness being the overriding principals governing the relationship. Both agencies further agree that the ultimate goal is to reduce automobile insurance fraud in Fresno County.

6/27/19

Christine Diep, Captain CDI Fraud Division Central Valley Regional Office		
1 4	,	

Jerry Stanley, Chief of Financial Crimes

Fresno County District Attorney's Office