

1 California, in that on or about May 11, 1990, in the County of Alameda, State of
2 California, said defendant did then and there unlawfully attempt to take and did
3 unlawfully attempt to cause to be taken from an insurance company money of a value
4 exceeding Four Hundred Dollars (\$400.00), through the filing of a false and fraudulent
5 insurance claims on behalf of HIMSELF, BUFFIE YEE, CAROL WONG, DUNG
6 CHUNG, VI NGUYEN, HUNG VAN PHAN and TONY THAN.
7

8 **COUNT SEVENTY-NINE** —

9 (as to defendant **PAUL DIEP**)

10 [re 5/11/90 Collision, Incident No. 3]

11 The Grand Jury of the County of Alameda hereby accuses **PAUL DIEP** of a
12 felony, to wit: a violation of Section **1871.1(a)(3)** of the Insurance Code of California,
13 in that on or about May 11, 1990, in the County of Alameda, State of California, said
14 defendant did then and there knowingly cause and participate in a vehicular accident,
15 for the purpose of presenting a false and fraudulent claim.
16

17 **COUNT EIGHTY** —

18 (as to defendant **PAUL DIEP**)

19 [re 5/11/90 Collision, Incident No. 3]

20 The Grand Jury of the County of Alameda hereby accuses **PAUL DIEP** of a
21 felony, to wit: a violation of Section **1871.1 (a)(6)(A)** of the Insurance Code of
22 California, in that on or about May 11, 1990, in the County of Alameda, State of
23 California, said defendant did then and there knowingly assist, abet, solicit and conspire
24 with another person to knowingly present a false or fraudulent claim for the payment
25 of a loss, including payment of a loss under a contract of insurance.
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