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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARC HOANG,

Defendant.

No. CR SA20-CR-0095-JVS

I N F O R M A T I O N

[18 U.S.C. § 1001(a)(2): False Statement]


The United States Attorney charges:

[18 U.S.C. § 1001(a)(2)]

On or about October 16, 2014, in Orange County, California, within the Central District of California, and elsewhere, in a matter within the jurisdiction of the U.S. Drug Enforcement Administration ("DEA"), a department and agency of the United States, defendant MARC HOANG knowingly and willfully made a materially false, fictitious, and fraudulent statement in that defendant HOANG represented in a DEA Form 224A, Application for Registration Under Controlled Substance Act, which defendant HOANG submitted to the DEA to renew the controlled substances registration number FI3272236 issued to Infinite Health Solutions, Inc. ("IHSI"), that, as the identified

1 applicant and signer of the Form 224A, he was a person who
2 distributed or proposed to distribute any controlled substance and
3 was thus required to be registered with the DEA, pursuant to 21
4 C.F.R. §§ 1301.11(a) and 1301.13(e); was an officer of IHSI, as
5 required by 21 C.F.R § 1301.13(j); and was the Point of Contact for
6 IHSI when, in fact, as defendant HOANG then knew, defendant HOANG was
7 not at that time a person who distributed or proposed to distribute
8 controlled substances through IHSI, was not an officer of IHSI, and
9 was not the point of contact for IHSI.

10 NICOLA T. HANNA
11 United States Attorney

12 
13 Scott M. Garringer
14 Deputy Chief, Criminal Division For:

15 BRANDON D. FOX
16 Assistant United States Attorney
17 Chief, Criminal Division

18 RANEE A. KATZENSTEIN
19 Assistant United States Attorney
20 Chief, Major Frauds Section

21 ALEXANDER F. PORTER
22 Assistant United States Attorney
23 Acting Deputy Chief, Major Frauds
24 Section

25 MARK AVEIS
26 Assistant United States Attorney
27 Major Frauds Section
28