

1 STEPHANIE M. HINDS (CABN 154284)
2 United States Attorney

FILED

Apr 19 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. 3:22-cr-00164 CRB
14 Plaintiff,)
15 v.) VIOLATIONS:
16 RANNA SHAMIYA,) 18 U.S.C. §§ 1035 and 2 – False Statements Related
17 Defendant.) to Health Care Matters
18) SAN FRANCISCO VENUE

19
20
21 INFORMATION

22 The United States Attorney charges:

23 Introductory Allegations

24 At all times relevant to this Information, unless otherwise indicated:

- 25 1. Defendant RANNA SHAMIYA (“SHAMIYA”) was the Director of Pharmacy at
26 Hospital-1, in the Northern District of California, and in June 2021, used her access to controlled
27 medical information to aid and abet naturopathic doctor Juli Mazi in the making and use of false and
28 fraudulent Centers for Disease Control and Prevention (“CDC”) COVID-19 vaccination record cards.

INFORMATION

1 SHAMIYA did so in connection with Mazi offering, selling, and delivering purported
2 homeoprophylaxis immunizations for COVID-19 and fraudulent COVID-19 vaccination record cards
3 that falsely made it appear that customers had received U.S. Food and Drug Administration (“FDA”)-
4 authorized vaccines.

5 INDIVIDUALS AND ENTITIES

6 2. Defendant RANNA SHAMIYA resided in the Northern District of California and was the
7 Director of Pharmacy at Hospital-1, located in the Northern District of California.

8 3. Juli Mazi resided in the Northern District of California and was a licensed naturopathic
9 doctor with her naturopathic medical practice based in the Northern District of California.

10 THE FEDERAL COVID-19 VACCINATION PROGRAM

11 4. In or around January 2020, the Secretary of the U.S. Department of Health and Human
12 Services (“HHS”) declared a national public emergency under Title 42, United States Code, Section
13 247d, as a result of the spread of the novel coronavirus COVID-19 within the United States. On or
14 about March 13, 2020, the President of the United States issued Proclamation 9994 declaring a national
15 emergency beginning on March 1, 2020, as a result of the rapid spread of COVID-19.

16 5. To help combat COVID-19 and the resulting pandemic, in May 2020, the United States
17 initiated Operation Warp Speed, later renamed HHS-DOD COVID19 Countermeasures Acceleration
18 Group (“CAG”), a partnership between HHS, the Department of Defense, and other federal agencies,
19 which existed through December 31, 2021, to make safe and effective vaccines available as quickly as
20 possible. The principal purpose of CAG was to ensure that every American could receive a COVID-19
21 vaccine by supporting the acceleration of vaccine development, manufacturing, and distribution to
22 states, other jurisdictions, and federal agencies and programs for vaccine administration.

23 6. Upon awarding contracts and providing funding, by September 2021, the federal
24 government had acquired over 673 million doses of vaccines developed by Moderna, Pfizer, and
25 Johnson and Johnson, which was sufficient to fully vaccinate 373 million people, in line with CAG’s
26 overall goal of making sufficient adult vaccines available free of charge for the American public.

27 7. In order to enable their rapid distribution upon the development of safe and effective
28 COVID-19 vaccines, the Secretary of HHS issued a notice, pursuant to section 564 of the Federal Food,

1 Drug, and Cosmetic Act, that there was a public health emergency that had a significant potential to
2 affect national security or the health and security of United States citizens living abroad and that
3 circumstances existed justifying the authorization of emergency use of drugs and biological products
4 during the COVID-19 pandemic. Pursuant to the authority granted under this declaration, the FDA
5 authorized the Pfizer COVID-19 vaccine for emergency use on or about December 11, 2020, the
6 Moderna COVID-19 vaccine for emergency use on or about December 18, 2020, and the Johnson and
7 Johnson COVID-19 vaccine for emergency use on or about February 27, 2021 (together, the “COVID-
8 19 vaccines”).

9 8. To ensure that each American could receive a COVID-19 vaccine, the CDC prepared for
10 widespread administration, distribution, and tracking of the administration of COVID-19 vaccines.
11 Vaccine allocation and centralized distribution utilized HHS’s Vaccine Tracking System (VTrckS), a
12 secure, web-based system that integrated the entire publicly-funded vaccine supply chain from
13 purchasing and ordering, through distribution to participating state, local, and territorial health
14 departments and health care providers.

15 9. The CDC controlled the distribution of COVID-19 vaccines and COVID-19 vaccination
16 record cards, distributing them only to medical providers that were eligible to administer the COVID-19
17 vaccines.

18 10. To be eligible to administer the COVID-19 vaccines, medical providers and other
19 administrators of COVID-19 vaccines were required to enter into provider agreements with the CDC
20 (“COVID-19 Provider Agreement”).

21 11. Additionally, per the COVID-19 Provider Agreement, medical providers and other
22 administrators of COVID-19 vaccines agreed, and were required, to “provide a completed COVID-19
23 vaccination record card to every COVID-19 [v]accine recipient, the adult caregiver accompanying the
24 recipient, or other legal representative” (“COVID-19 vaccination record card”).

25 12. The COVID-19 vaccination record cards were designed and printed according to CDC
26 specifications and requirements and contained both HHS’s and CDC’s official agency logos. The
27 COVID-19 vaccination record cards recorded the name and date of birth of the individual receiving the
28 COVID-19 vaccine, the name of the manufacturer of the COVID-19 vaccine administered, the location

1 where each dose was administered, and the lot number of the vaccine dose. A lot number was a string of
2 numbers and letters that tracked a specific batch of vaccine from its initial production. Each lot number
3 was connected to an expiration date, which indicated when the batch of vaccine may start to degrade.
4 The lot numbers were used by the CDC and health care providers to ensure that expired vaccines were
5 discarded, and not administered to patients.

6 13. The CDC mandated that valid proof of COVID-19 vaccination, specifically, the COVID-
7 19 vaccination record card, could only be provided to individuals by authorized providers administering
8 COVID-19 vaccines.

9 THE HOMEOPROPHYLAXIS IMMUNIZATION AND
10 COVID-19 VACCINATION RECORD CARD FRAUD SCHEME

11 14. Beginning in or around May 2021, and continuing through in or around July 2021,
12 SHAMIYA aided and abetted false statements relating to health care matters in connection with the
13 offering and selling of COVID-19 homeoprophylaxis immunizations, and the fabricating of CDC
14 COVID-19 vaccination record cards in order to falsely make it appear that customers received an FDA-
15 authorized COVID-19 vaccine.

16 15. In or around May 2021, SHAMIYA became aware that Mazi offered for sale
17 homeoprophylaxis immunizations, in the form of pellets, which Mazi claimed could provide lifelong
18 immunity to COVID-19, and CDC COVID-19 vaccination record cards, which Mazi instructed should
19 be filled out with COVID-19 vaccine lot numbers to make it falsely appear as though the recipient had
20 received an FDA-authorized COVID-19 vaccine, when they in fact did not.

21 16. In furtherance of Mazi's offense, on or about June 18, 2021, and on or about June 27,
22 2021, SHAMIYA misused her access to controlled medical information as the Director of Pharmacy at
23 Hospital-1 to identify legitimate lot numbers for FDA-authorized COVID-19 vaccines. SHAMIYA then
24 transmitted the legitimate lot number information to Mazi, so that Mazi could use the lot numbers to
25 create, or cause the creation of, false and fraudulent CDC COVID-19 vaccination record cards that
26 reflected falsely that Mazi's customers received an FDA-authorized COVID-19 vaccine with a real lot
27 number, when they in fact did not receive such a vaccine. In so doing, SHAMIYA knew and intended
28 that providing the legitimate lot number information would aid and abet Mazi's homeoprophylaxis

1 immunization and CDC COVID-19 vaccination record card scheme, through making false statements
2 relating to health care matters, and further conceal and disguise the scheme from detection. Mazi used
3 the information provided by SHAMIYA on multiple occasions for the sale or creation of false and
4 fraudulent CDC COVID-19 vaccination record cards, to include on or about June 28, 2021, and on or
5 about July 1, 2021.

6 COUNTS ONE AND TWO: (18 U.S.C. §§ 1035 and 2 – False Statements Related to
7 Health Care Matters)

8 17. Paragraphs 1 through 16 of this Information are re-alleged and incorporated as if fully set
9 forth here.

10 18. On or about the dates set forth below, within the Northern District of California, the
11 defendant,

12 RANNA SHAMIYA,

13 did, in a matter involving a health care benefit program, and in connection with the delivery of and
14 payment for health care benefits, items, and services, knowingly and willfully aid and abet the use of
15 materially false writings and documents knowing the same to contain materially false, fictitious, and
16 fraudulent statements and entries, namely, on or about June 18, 2021, and on or about June 27, 2021, the
17 defendant collected and provided to Mazi, via electronic mail messages, lot numbers and expiration dates
18 for CDC COVID-19 vaccines that Mazi subsequently used for the creation and sale of false and fraudulent
19 CDC COVID-19 vaccination record cards, on or about each of the following dates:

COUNT	DATE	FALSE WRITING	PATIENT
COUNT 1	June 28, 2021	COVID-19 Vaccination Record Card	E.M.
COUNT 2	July 1, 2021	COVID-19 Vaccination Record Card	H.Z.

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1 Each in violation of Title 18, United States Code, Section 1035 and Title 18, United States Code,
2 Section 2.

3 DATED: April 19, 2022

4
5 STEPHANIE M. HINDS
6 United States Attorney

7 /s/ Katherine Lloyd-Lovett
8 KATHERINE M. LLOYD-LOVETT
9 Assistant United States Attorney

10 JOSEPH S. BEEMSTERBOER
11 Acting Chief
12 Criminal Division, Fraud Section
13 U.S. Department of Justice

14 JACOB FOSTER
15 Assistant Chief, Fraud Section
16 U.S. Department of Justice

17 /s/ S. Babu Kaza
18 S. BABU KAZA
19 Trial Attorney, Fraud Section
20 U.S. Department of Justice
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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. Sections 1035 and 2 (False Statements Related to Health Care Matters) (Counts One and Two)

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: Counts One and Two: 5 years of imprisonment; \$250,000 fine or twice the gross gain/loss; 3 years of supervised release; \$100 special assessment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

▶ RANNA SHAMIYA

DISTRICT COURT NUMBER

3:22-cr-00164 CRB

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Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Health and Human Services Office of the Inspector General

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form STEPHANIE M. HINDS

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Katherine M. Lloyd-Lovett

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges ▶ n/a

2) Is a Fugitive

3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge

5) On another conviction } Federal State

6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments: