

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

v.

FILED

JUL 11 2017

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JS

CHRISTOPHER OWENS,

CR17

0370

WHA

DEFENDANT(S).

INDICTMENT

VIOLATIONS:

Counts One through Thirty-Six: 21 U.S.C. §§ 841(a)(1), (b)(1)(C) - Distribution
and Possession with Intent to Distribute Oxycodone Hydrochloride

A true bill.

[Signature]

Foreman

Filed in open court this 11 day of

July 2017

MARIA-ELENA JAMES
UNITED STATES MAGISTRATE JUDGE

[Signature]

Clerk

ROSE MAHER

NO BAIL ARREST WARRANT

Bail \$

1 - th

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Counts One through Thirty-Six: 21 U.S.C. §§ 841(a)(1), (b)(1)
 (C) - Distribution and Possession with Intent to Distribute
 Oxycodone Hydrochloride

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: Maximum 20 Years Imprisonment; Maximum Fine of \$1,000,000;
 Minimum Supervised Release of 3 Years; Maximum Supervised
 Release of Life; Mandatory \$100 Special Assessment; Forfeiture,
 Potential Deportation; Mandatory and Discretionary Denial of
 Federal Benefits; Possible Registration as a Drug Offender

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

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

CHRISTOPHER OWENS

DISTRICT COURT NUMBER

CR 17 0370 WHA
FILED
DEFENDANT**PROCEEDING**

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

Drug Enforcement Administration

☐ 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 Brian J. Stretch

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned)

Sheila A.G. Armbrust

JUL 11 2017 **IS NOT IN CUSTODY**
 SUSAN Y. BOONING Not detained give date any prior
 CLERK, U.S. DISTRICT COURT summons was served on above charges
 NORTHERN DISTRICT OF CALIFORNIA
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ 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

Bail Amount: no bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

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

Date/Time:

Before Judge:

Comments:

BRIAN J. STRETCH (CABN 163973)
United States Attorney

FILED

JUL 11 2017

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER OWENS,

Defendant.

CR 17

0370WHA

No.

VIOLATIONS: Counts One Through Thirty-Six: 21
U.S.C. § 841(a)(1) – Distribution and Possession with
Intent to Distribute Oxycodone Hydrochloride; 21
U.S.C. § 853(a) – Forfeiture

INDICTMENT

The Grand Jury charges:

COUNT ONE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

On or about September 22, 2012, in the Northern District of California, the defendant

CHRISTOPHER OWENS,

then a physician licensed to practice medicine in the state of California, while acting and intending to act
outside the course of usual professional practice and without a legitimate medical purpose, did
knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

1 COUNT TWO: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

2 On or about January 24, 2013, in the Northern District of California, the defendant

3 CHRISTOPHER OWENS,

4 then a physician licensed to practice medicine in the state of California, while acting and intending to act
5 outside the course of usual professional practice and without a legitimate medical purpose, did
6 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
7 hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
8 practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

9 COUNT THREE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

10 On or about April 26, 2013, in the Northern District of California, the defendant

11 CHRISTOPHER OWENS,

12 then a physician licensed to practice medicine in the state of California, while acting and intending to act
13 outside the course of usual professional practice and without a legitimate medical purpose, did
14 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
15 hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
16 practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

17 COUNT FOUR: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

18 On or about May 9, 2013, in the Northern District of California, the defendant

19 CHRISTOPHER OWENS,

20 then a physician licensed to practice medicine in the state of California, while acting and intending to act
21 outside the course of usual professional practice and without a legitimate medical purpose, did
22 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
23 hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
24 practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

25 COUNT FIVE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

26 On or about September 6, 2013, in the Northern District of California, the defendant

27 CHRISTOPHER OWENS,

28 then a physician licensed to practice medicine in the state of California, while acting and intending to act

1 outside the course of usual professional practice and without a legitimate medical purpose, did
2 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
3 hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
4 practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

5 COUNT SIX: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

6 On or about November 14, 2013, in the Northern District of California, the defendant
7 CHRISTOPHER OWENS,
8 then a physician licensed to practice medicine in the state of California, while acting and intending to act
9 outside the course of usual professional practice and without a legitimate medical purpose, did
10 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
11 hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
12 practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

13 COUNT SEVEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

14 On or about December 21, 2013, in the Northern District of California, the defendant
15 CHRISTOPHER OWENS,
16 then a physician licensed to practice medicine in the state of California, while acting and intending to act
17 outside the course of usual professional practice and without a legitimate medical purpose, did
18 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
19 hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
20 practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

21 COUNT EIGHT: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

22 On or about January 11, 2014, in the Northern District of California, the defendant
23 CHRISTOPHER OWENS,
24 then a physician licensed to practice medicine in the state of California, while acting and intending to act
25 outside the course of usual professional practice and without a legitimate medical purpose, did
26 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
27 hydrochloride with acetaminophen, without a medical need and outside the course of usual medical
28 practice, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

1 COUNT NINE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

2 On or about February 25, 2014, in the Northern District of California, the defendant

3 CHRISTOPHER OWENS,

4 then a physician licensed to practice medicine in the state of California, while acting and intending to act
5 outside the course of usual professional practice and without a legitimate medical purpose, did
6 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
7 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
8 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

9 COUNT TEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

10 On or about April 9, 2014, in the Northern District of California, the defendant

11 CHRISTOPHER OWENS,

12 then a physician licensed to practice medicine in the state of California, while acting and intending to act
13 outside the course of usual professional practice and without a legitimate medical purpose, did
14 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
15 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
16 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

17 COUNT ELEVEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

18 On or about May 20, 2014, in the Northern District of California, the defendant

19 CHRISTOPHER OWENS,

20 then a physician licensed to practice medicine in the state of California, while acting and intending to act
21 outside the course of usual professional practice and without a legitimate medical purpose, did
22 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
23 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
24 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

25 COUNT TWELVE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

26 On or about June 2, 2014, in the Northern District of California, the defendant

27 CHRISTOPHER OWENS,

28 then a physician licensed to practice medicine in the state of California, while acting and intending to act

1 outside the course of usual professional practice and without a legitimate medical purpose, did
2 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
3 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
4 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

5 COUNT THIRTEEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

6 On or about July 2, 2014, in the Northern District of California, the defendant

7 CHRISTOPHER OWENS,

8 then a physician licensed to practice medicine in the state of California, while acting and intending to act
9 outside the course of usual professional practice and without a legitimate medical purpose, did
10 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
11 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
12 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

13 COUNT FOURTEEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

14 On or about July 21, 2014, in the Northern District of California, the defendant

15 CHRISTOPHER OWENS,

16 then a physician licensed to practice medicine in the state of California, while acting and intending to act
17 outside the course of usual professional practice and without a legitimate medical purpose, did
18 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
19 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
20 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

21 COUNT FIFTEEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

22 On or about August 7, 2014, in the Northern District of California, the defendant

23 CHRISTOPHER OWENS,

24 then a physician licensed to practice medicine in the state of California, while acting and intending to act
25 outside the course of usual professional practice and without a legitimate medical purpose, did
26 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
27 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
28 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

1 COUNT SIXTEEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

2 On or about August 22, 2014, in the Northern District of California, the defendant

3 CHRISTOPHER OWENS,

4 then a physician licensed to practice medicine in the state of California, while acting and intending to act
5 outside the course of usual professional practice and without a legitimate medical purpose, did
6 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
7 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
8 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

9 COUNT SEVENTEEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

10 On or about September 4, 2014, in the Northern District of California, the defendant

11 CHRISTOPHER OWENS,

12 then a physician licensed to practice medicine in the state of California, while acting and intending to act
13 outside the course of usual professional practice and without a legitimate medical purpose, did
14 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
15 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
16 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

17 COUNT EIGHTEEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

18 On or about September 15, 2014, in the Northern District of California, the defendant

19 CHRISTOPHER OWENS,

20 then a physician licensed to practice medicine in the state of California, while acting and intending to act
21 outside the course of usual professional practice and without a legitimate medical purpose, did
22 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
23 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
24 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

25 COUNT NINETEEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

26 On or about September 27, 2014, in the Northern District of California, the defendant

27 CHRISTOPHER OWENS,

28 then a physician licensed to practice medicine in the state of California, while acting and intending to act

1 outside the course of usual professional practice and without a legitimate medical purpose, did
2 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
3 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
4 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

5 COUNT TWENTY: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

6 On or about October 10, 2014, in the Northern District of California, the defendant

7 CHRISTOPHER OWENS,

8 then a physician licensed to practice medicine in the state of California, while acting and intending to act
9 outside the course of usual professional practice and without a legitimate medical purpose, did
10 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
11 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
12 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

13 COUNT TWENTY-ONE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

14 On or about October 22, 2014, in the Northern District of California, the defendant

15 CHRISTOPHER OWENS,

16 then a physician licensed to practice medicine in the state of California, while acting and intending to act
17 outside the course of usual professional practice and without a legitimate medical purpose, did
18 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
19 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
20 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

21 COUNT TWENTY-TWO: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

22 On or about November 2, 2014, in the Northern District of California, the defendant

23 CHRISTOPHER OWENS,

24 then a physician licensed to practice medicine in the state of California, while acting and intending to act
25 outside the course of usual professional practice and without a legitimate medical purpose, did
26 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
27 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
28 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

1 COUNT TWENTY-THREE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

2 On or about November 14, 2014, in the Northern District of California, the defendant
3 CHRISTOPHER OWENS,
4 then a physician licensed to practice medicine in the state of California, while acting and intending to act
5 outside the course of usual professional practice and without a legitimate medical purpose, did
6 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
7 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
8 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

9 COUNT TWENTY-FOUR: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

10 On or about November 29, 2014, in the Northern District of California, the defendant
11 CHRISTOPHER OWENS,
12 then a physician licensed to practice medicine in the state of California, while acting and intending to act
13 outside the course of usual professional practice and without a legitimate medical purpose, did
14 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
15 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
16 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

17 COUNT TWENTY-FIVE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

18 On or about December 1, 2014, in the Northern District of California, the defendant
19 CHRISTOPHER OWENS,
20 then a physician licensed to practice medicine in the state of California, while acting and intending to act
21 outside the course of usual professional practice and without a legitimate medical purpose, did
22 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
23 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
24 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

25 COUNT TWENTY-SIX: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

26 On or about December 26, 2014, in the Northern District of California, the defendant
27 CHRISTOPHER OWENS,
28 then a physician licensed to practice medicine in the state of California, while acting and intending to act

1 outside the course of usual professional practice and without a legitimate medical purpose, did
2 knowingly and intentionally prescribe a controlled substance, to wit oxycodone hydrochloride, without a
3 medical need and outside the course of usual medical practice, in violation of Title 21 United States
4 Code, Sections 841(a)(1) and (b)(1)(C).

5 COUNT TWENTY-SEVEN: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

6 On or about January 12, 2015, in the Northern District of California, the defendant
7 CHRISTOPHER OWENS,
8 then a physician licensed to practice medicine in the state of California, while acting and intending to act
9 outside the course of usual professional practice and without a legitimate medical purpose, did
10 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
11 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
12 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

13 COUNT TWENTY-EIGHT: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

14 On or about January 29, 2015, in the Northern District of California, the defendant
15 CHRISTOPHER OWENS,
16 then a physician licensed to practice medicine in the state of California, while acting and intending to act
17 outside the course of usual professional practice and without a legitimate medical purpose, did
18 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
19 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
20 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

21 COUNT TWENTY-NINE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

22 On or about February 13, 2015, in the Northern District of California, the defendant
23 CHRISTOPHER OWENS,
24 then a physician licensed to practice medicine in the state of California, while acting and intending to act
25 outside the course of usual professional practice and without a legitimate medical purpose, did
26 knowingly and intentionally prescribe a Schedule II Schedule II controlled substance, to wit oxycodone
27 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
28 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

1 COUNT THIRTY: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

2 On or about March 2, 2015, in the Northern District of California, the defendant

3 CHRISTOPHER OWENS,

4 then a physician licensed to practice medicine in the state of California, while acting and intending to act
5 outside the course of usual professional practice and without a legitimate medical purpose, did
6 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
7 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
8 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

9 COUNT THIRTY-ONE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

10 On or about March 18, 2015, in the Northern District of California, the defendant

11 CHRISTOPHER OWENS,

12 then a physician licensed to practice medicine in the state of California, while acting and intending to act
13 outside the course of usual professional practice and without a legitimate medical purpose, did
14 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
15 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
16 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

17 COUNT THIRTY-TWO: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

18 On or about April 4, 2015, in the Northern District of California, the defendant

19 CHRISTOPHER OWENS,

20 then a physician licensed to practice medicine in the state of California, while acting and intending to act
21 outside the course of usual professional practice and without a legitimate medical purpose, did
22 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
23 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
24 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

25 COUNT THIRTY-THREE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

26 On or about April 22, 2015, in the Northern District of California, the defendant

27 CHRISTOPHER OWENS,

28 then a physician licensed to practice medicine in the state of California, while acting and intending to act

1 outside the course of usual professional practice and without a legitimate medical purpose, did
2 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
3 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
4 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

5 COUNT THIRTY-FOUR: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

6 On or about May 9, 2015, in the Northern District of California, the defendant

7 CHRISTOPHER OWENS,

8 then a physician licensed to practice medicine in the state of California, while acting and intending to act
9 outside the course of usual professional practice and without a legitimate medical purpose, did
10 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
11 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
12 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

13 COUNT THIRTY-FIVE: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

14 On or about May 27, 2015, in the Northern District of California, the defendant

15 CHRISTOPHER OWENS,

16 then a physician licensed to practice medicine in the state of California, while acting and intending to act
17 outside the course of usual professional practice and without a legitimate medical purpose, did
18 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
19 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
20 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

21 COUNT THIRTY-SIX: (21 U.S.C. § 841(a)(1) – Distribution of Oxycodone Without a Medical Need)

22 On or about June 11, 2015, in the Northern District of California, the defendant

23 CHRISTOPHER OWENS,

24 then a physician licensed to practice medicine in the state of California, while acting and intending to act
25 outside the course of usual professional practice and without a legitimate medical purpose, did
26 knowingly and intentionally prescribe a Schedule II controlled substance, to wit oxycodone
27 hydrochloride, without a medical need and outside the course of usual medical practice, in violation of
28 Title 21 United States Code, Sections 841(a)(1) and (b)(1)(C).

1 FORFEITURE ALLEGATION: (21 U.S.C. § 853(a) – Criminal Forfeiture)

2 The factual allegations contained in Counts One through Thirty-Six of this Indictment are hereby
 3 re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant
 4 to the provisions of 21 U.S.C. § 853(a). Upon a conviction for the offenses alleged in Counts One
 5 through Thirty-Six, the defendant

6 CHRISTOPHER OWENS,

7 shall forfeit to the United States all right, title and interest in any property constituting and derived from
 8 any proceeds defendant obtained, directly or indirectly, as a result of said violation, and any property
 9 used, or intended to be used, in any manner or part, to commit or to facilitate the commission of said
 10 violation. If, as a result of any act or omission of the defendant, any of said property

- 11 a. cannot be located upon the exercise of due diligence;
- 12 b. has been transferred or sold to or deposited with, a third person;
- 13 c. has been placed beyond the jurisdiction of the Court;
- 14 d. has been substantially diminished in value; or
- 15 e. has been commingled with other property which cannot be divided without
- 16 difficulty;

17 any and all interest defendant has in any other property (not to exceed the value of the above forfeitable
 18 property) shall be vested in the United States and forfeited to the United States.

19 All in violation of 21 U.S.C. § 853(a) and Rule 32.2 of the Federal Rules of Criminal Procedure.

20
 21 DATED: July 11, 2017

A TRUE BILL.

22
 23 BRIAN J. STRETCH
 24 United States Attorney

FOREPERSON

25 Barbara J. Valliere
 26 BARBARA J. VALLIERE
 27 Chief, Criminal Division

28 (Approved as to form: Sheila H. Armburst)

SHEILA ARMBURST
 Assistant United States Attorney