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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
January 2019 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.
REZA RAY EHSAN,
Defendant.

CR NO. 19-00090-QW

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(C), (b)(1)(E), and (b)(2):
Distribution of Amphetamine Salts,
Buprenorphine, and Diazepam; 31
U.S.C. § 5324(a)(3): Structuring
of Currency Transactions; 18
U.S.C. § 2(b): Causing an Act to
be Done]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)]

On or about December 14, 2018, in Los Angeles County, within the
Central District of California, and elsewhere, defendant REZA RAY
EHSAN, then a physician licensed to practice medicine in the State of
California, while acting and intending to act outside the usual
course of professional practice and without a legitimate medical
purpose, knowingly and intentionally distributed buprenorphine, a
Schedule III narcotic drug controlled substance.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)]

On or about January 25, 2019, in Los Angeles County, within the Central District of California, and elsewhere, defendant REZA RAY EHSAN, then a physician licensed to practice medicine in the State of California, while acting and intending to act outside the usual course of professional practice and without a legitimate medical purpose, knowingly and intentionally distributed buprenorphine, a Schedule III narcotic drug controlled substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(2)]

On or about December 14, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant REZA RAY EHSAN, then a physician licensed to practice medicine in the State of California, while acting and intending to act outside the usual course of professional practice and without a legitimate medical purpose, knowingly and intentionally distributed diazepam, a Schedule IV controlled substance.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about January 25, 2019, in Los Angeles County, within the Central District of California, and elsewhere, defendant REZA RAY EHSAN, then a physician licensed to practice medicine in the State of California, while acting and intending to act outside the usual course of professional practice and without a legitimate medical purpose, knowingly and intentionally distributed amphetamine salts, a Schedule II controlled substance.

COUNTS FIVE through EIGHTEEN

[31 U.S.C. § 5324(a)(3); 18 U.S.C. § 2(b)]

1. At all times relevant to this Indictment, defendant REZA RAY EHSAN ("EHSAN") held signatory authority over the following bank accounts, among others: a Wells Fargo Bank ("WF") account ending in numbers 1455 ("WF 1455"); a WF account ending in numbers 4034 ("WF 4034"); a WF account ending in numbers 6032 ("WF 6032"); a WF account ending in numbers 6382 ("WF 6382"); a WF account ending in numbers 7168 ("WF 7168"); and a WF account ending in numbers 8299 ("WF 8299").

2. On or about the following dates, in Los Angeles County, within the Central District of California, defendant EHSAN, and others known and unknown to the Grand Jury, knowingly, and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structured, assisted in structuring, attempted to structure and assist in structuring, and willfully caused to be structured, the following currency transactions, namely, cash deposits, with domestic financial institutions:

| COUNT | TRANSACTIONS | TOTAL |
|-------|---|----------|
| FIVE | March 20, 2014 deposits of \$9,600 into WF 1455 and \$9,800 into WF 6032. | \$19,400 |
| SIX | April 9, 2014 deposits of \$5,325 into WF 1455 and \$9,800 into WF 6382. | \$15,124 |
| SEVEN | June 12, 2014 deposit of \$9,900 into WF 6382; and June 13, 2014 deposits of \$9,600 into WF 1455 and \$9,800 into WF 6382. | \$29,300 |
| EIGHT | December 6, 2014 deposits of \$8,400 into WF 1455 and \$9,800 into WF 4034. | \$18,200 |

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| COUNT | TRANSACTIONS | TOTAL |
|----------|---|----------|
| NINE | December 8, 2014 deposits of \$9,800 into WF 1455 and \$7,900 into WF 4034; December 9, 2014 deposits of \$7,700 into WF 1455 and \$9,900 into WF 4034; and December 10, 2014 deposit of \$8,390 into WF 1455. | \$43,690 |
| TEN | January 23, 2015 deposits of \$9,800 into WF 1455 and \$9,900 into WF 8299. | \$19,700 |
| ELEVEN | October 24, 2016 deposit of \$8,848 into WF 8299; October 25, 2016 deposit of \$9,000 into WF 8299; October 26, 2016 deposit of \$9,000 into WF 8299; October 27, 2016 deposit of \$9,000 into WF 8299; October 28, 2016 deposit of \$9,200 into WF 8299; and October 29, 2016 deposit of \$9,088 into WF 8299. | \$54,136 |
| TWELVE | November 17, 2016 deposit of \$9,500 into WF 8299; November 18, 2016 deposit of \$8,590 into WF 8299; and November 19, 2016 deposit of \$9,600 into WF 8299. | \$27,690 |
| THIRTEEN | November 28, 2016 deposit of \$9,800 into WF 8299; November 29, 2016 deposit of \$9,400 into WF 8299; November 30, 2016 deposit of \$9,800 into WF 8299; and December 1, 2016 deposit of \$9,600 into WF 8299. | \$38,600 |
| FOURTEEN | January 30, 2017 deposit of \$9,800 into WF 8299; and January 31, 2017 deposit of \$9,960 into WF 8299. | \$19,760 |
| FIFTEEN | February 6, 2017 deposit of \$9,800 into WF 8299; February 7, 2017 deposit of \$9,800 into WF 8299; February 8, 2017 deposit of \$9,800 into WF 8299; February 9, 2017 deposit of \$9,800 into WF 8299; and February 10, 2017 deposit of \$9,600 into WF 8299. | \$48,800 |

| COUNT | TRANSACTIONS | TOTAL |
|-----------|--|----------|
| SIXTEEN | February 13, 2017 deposit of \$9,800 into WF 8299; February 14, 2017 deposit of \$9,900 into WF 8299; February 15, 2017 deposit of \$9,800 into WF 8299; February 16, 2017 deposit of \$9,800 into WF 8299; February 17, 2017 deposit of \$9,670 into WF 8299; and February 18, 2017 deposit of \$9,900 into WF 8299. | \$58,870 |
| SEVENTEEN | February 22, 2017 deposit of \$9,700 into WF 8299; and February 23, 2017 deposit of \$9,700 into WF 7168. | \$19,400 |
| EIGHTEEN | May 31, 2017 deposit of \$8,690 into WF 1455; and June 1, 2017 deposit of \$9,420 into WF 1455. | \$18,110 |

A TRUE BILL

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