

1 ROB BONTA
Attorney General of California
2 MACHAELA M. MINGARDI
Supervising Deputy Attorney General
3 C. HAY-MIE CHO
Deputy Attorney General
4 State Bar No. 282259
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-4433
6 Facsimile: (415) 703-5480
E-mail: haymie.cho@doj.ca.gov
7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Automatic Suspension
Order Against:

12 **RAHIM SHAFI, M.D.**
13 **8 Fairland St.**
Lexington, MA 02421-7510

14 **Physician's and Surgeon's Certificate No. A**
15 **50853,**

16 Respondent.

Case No. 800-2024-112145

**NOTICE OF AUTOMATIC
SUSPENSION OF LICENSE**

[Bus. & Prof. Code § 2236.1]

17
18 **TO RESPONDENT RAHIM SHAFI, M.D.:**

19 **YOU ARE HEREBY NOTIFIED** that the Medical Board of California, Department of
20 Consumer Affairs (Board), has automatically suspended Physician's and Surgeon's Certificate
21 No. A 50853 by operation of law effective the date this Notice of Automatic Suspension is
22 signed, after having received and reviewed certified copies of the records of convictions
23 described below:

24 1. On or about March 6, 2025, the Board obtained certified copies of the Superseding
25 Indictment, Verdict Form, and Judgment. These documents establish that on or about February 9,
26 2024, in a federal criminal proceeding entitled *United States of America v. Rahim Shafi, D. Mass.*
27 Case No. 4:20-cr-40021-MRG, a jury found Respondent Rahim Shafi, M.D. (Respondent) guilty
28 of International Money Laundering and/or Aiding and Abetting the Same in violation of 18

1 U.S.C. § 1956(a)(2)(A) (Counts 2 through 4 of the Superseding Indictment [Indictment]);
2 Knowingly Importing Merchandise Contrary to Law and/or Aiding and Abetting the Same in
3 violation of 18 U.S.C. § 545 (Counts 6 through 8 of the Indictment); and Receipt and Delivery of
4 Misbranded Drug without the Intent to Defraud in violation of 21 U.S.C. § 331(c) (Count 9 of the
5 Indictment), all federal felonies.

6 2. On or about February 12, 2025, Respondent was sentenced to 36 months in prison, to
7 be followed by 36 months of supervised release. Respondent was ordered to surrender by
8 February 28, 2025, before 2:00 p.m. to the Bureau of Prisons to begin the period of incarceration.

9 3. Respondent is currently incarcerated at the Schuylkill Federal Correctional Institution
10 under Register Number 04400-509. A true and correct copy of the printout from the Federal
11 Bureau of Prisons' website, accessed on April 10, 2025, showing Respondent's current
12 incarceration is attached hereto as Attachment A.

13 4. The following documents supporting these findings, are attached hereto and are
14 incorporated herein by reference:

15 Attachment B: Certified Copy of Superseding Indictment Dated July 8, 2021 [ECF No. 69]

16 Attachment C: Certified Copy of Verdict Form Dated February 9, 2024 [ECF No. 197]

17 Attachment D: Redacted Certified Amended Judgment Dated February 12, 2025 [ECF No.
18 295]

19 **INCARCERATION: AUTOMATIC SUSPENSION**

20 5. Business and Professions Code Section 2236.1 states:

21
22 (a) A physician and surgeon's certificate shall be suspended automatically during
23 any time that the holder of the certificate is incarcerated after conviction of a felony,
24 regardless of whether the conviction has been appealed. The Division of Medical Quality¹
25 shall, immediately upon receipt of the certified copy of the record of conviction, determine
whether the certificate of the physician and surgeon has been automatically suspended by
virtue of the physician and surgeon's incarceration, and if so, the duration of that
suspension. The division shall notify the physician and surgeon of the license suspension
and of the right to elect to have the issue of penalty heard as provided in this section.

26 ¹ Business and Professions Code section 2002, as amended and effective January 1, 2008,
27 provides that, unless otherwise expressly provided, the term "board" as used in the State Medical
28 Practice Act (Bus. & Prof. Code § 2000, et seq.) means the Medical Board of California, and
references to the Division of Medical Quality and Division of Licensing in the Act or any other
provision of law shall be deemed to refer to the Board.

1 (b) Upon receipt of the certified copy of the record of conviction, if after a hearing it
2 is determined therefrom that the felony of which the licensee was convicted was
3 substantially related to the qualifications, functions, or duties of a physician and surgeon,
4 the Division of Medical Quality shall suspend the license until the time for appeal has
5 elapsed, if an appeal has not been taken, or until the judgment of conviction has been
6 affirmed on appeal or has otherwise become final, and until further order of the division.
7 The issue of substantial relationship shall be heard by an administrative law judge from the
8 Medical Quality Hearing Panel sitting alone or with a panel of the division, in the discretion
9 of the division.

10 (c) Notwithstanding subdivision (b), a conviction of any crime referred to in Section
11 2237, or a conviction of Section 187, 261, 288, or former Section 262, of the Penal Code,
12 shall be conclusively presumed to be substantially related to the qualifications, functions, or
13 duties of a physician and surgeon and a hearing shall not be held on this issue. Upon its
14 own motion or for good cause shown, the division may decline to impose or may set aside
15 the suspension when it appears to be in the interest of justice to do so, with due regard to
16 maintaining the integrity of and confidence in the medical profession.

17 (d)(1) Discipline may be ordered in accordance with Section 2227, or the Division
18 of Licensing may order the denial of the license when the time for appeal has elapsed, the
19 judgment of conviction has been affirmed on appeal, or an order granting probation is made
20 suspending the imposition of sentence, irrespective of a subsequent order under Section
21 1203.4 of the Penal Code allowing the person to withdraw the plea of guilty and to enter a
22 plea of not guilty, setting aside the verdict of guilty, or dismissing the accusation,
23 complaint, information, or indictment.

24 (2) The issue of penalty shall be heard by an administrative law judge from the
25 Medical Quality Hearing Panel sitting alone or with a panel of the division, in the discretion
26 of the division. The hearing shall not be had until the judgment of conviction has become
27 final or, irrespective of a subsequent order under Section 1203.4 of the Penal Code, an order
28 granting probation has been made suspending the imposition of sentence; except that a
licensee may, at the licensee's option, elect to have the issue of penalty decided before those
time periods have elapsed. Where the licensee so elects, the issue of penalty shall be heard
in the manner described in this section at the hearing to determine whether the conviction
was substantially related to the qualifications, functions, or duties of a physician and
surgeon. If the conviction of a licensee who has made this election is overturned on appeal,
any discipline ordered pursuant to this section shall automatically cease. This subdivision
does not prohibit the division from pursuing disciplinary action based on any cause other
than the overturned conviction.

(e) The record of the proceedings resulting in the conviction, including a transcript
of the testimony therein, may be received in evidence.

(f) The other provisions of this article setting forth a procedure for the suspension or
revocation of a physician and surgeon's certificate shall not apply to proceedings conducted
pursuant to this section.

WHEREFORE, THE MEDICAL BOARD OF CALIFORNIA, DEPARTMENT OF
CONSUMER AFFAIRS HEREBY NOTIFIES YOU THAT, by virtue of said conviction and
incarceration, Physician's and Surgeon's Certificate Number A 50853, issued to Rahim Shafa,
M.D., was automatically suspended, by operation of law, effective April 24, 2025, pursuant to

1 Business and Professions Code section 2236.1, subdivision (a).

2 Said suspension shall remain suspended while you are incarcerated, and thereafter until a
3 hearing may be held pursuant to Business and Professions Code 2236.1, subdivisions (a) and
4 (d)(2), or until further order of the Board.

5 Respondent Rahim Shafa, M.D., shall cause to be delivered to the Board both his wall and
6 pocket license certificate within 15 days from the date of the service of this Order.

7 **YOU ARE FURTHER NOTIFIED THAT** you have a right to a hearing on the issue of
8 penalty, as provided by Business and Professions Code section 2236.1, subdivisions (a) and
9 (d)(2). A copy of Business and Professions Code section 2236.1 is attached. A request for
10 penalty hearing may be made by delivering or mailing such a request to: C. Hay-Mie Cho,
11 Deputy Attorney General, Department of Justice, Office of the Attorney General, 455 Golden
12 Gate Avenue, Suite 11000, San Francisco, California 94102-7004.

13 DATED: APR 24 2025

14 
15 REJI VARGHESE
16 Executive Director
17 Medical Board of California
18 Department of Consumer Affairs
19 State of California
20 Complainant

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ATTACHMENT A

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Find an inmate.

Locate the whereabouts of a federal inmate incarcerated from 1982 to the present. Due to the First Step Act, sentences are being reviewed and recalculated to address pending Federal Time Credit changes. As a result, an inmate's release date may not be up-to-date. Website visitors should continue to check back periodically to see if any changes have occurred.

If an individual is listed as "Released" or "Not in BOP Custody" and no facility location is indicated, the inmate is no longer in BOP custody, however, the inmate may still be in the custody of some other correctional/criminal justice system/law enforcement entity, or on parole or supervised release.

Find By Number

Find By Name

First

Middle

Last

Race

Age

Sex

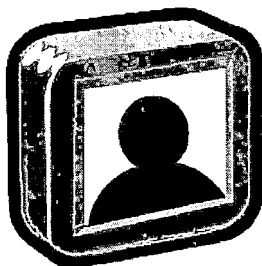
Rahim

Shafa

1 Result for search **Rahim Shafa**

 Clear Form

Search



RAHIM SHAFa

Register Number: 04400-509

Age: 67

Race: White

Sex: Male

Located at: Schuylkill FCI

Release Date: UNKNOWN

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ATTACHMENT B

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

RAHIM SHAFI and
NAHID TORMOSI SHAFI,
a/k/a NAHID TORMOSI,

Defendants

) Criminal No. 20-CR-40021-TSH
)
) Violations:
)
) Count One:
) Conspiracy to Commit International
) Money Laundering
) (18 U.S.C. § 1956(h))
)
) Counts Two - Four:
) International Money Laundering;
) Aiding and Abetting
) (18 U.S.C. §§ 1956(a)(2)(A) and (2))
)
) Count Five:
) Conspiracy to Defraud the United States
) (18 U.S.C. § 371)
)
) Counts Six - Eight:
) Importing Merchandise Contrary to Law;
) Aiding and Abetting
) (18 U.S.C. §§ 545 and 2)
)
) Count Nine:
) Receipt and Delivery of Misbranded Drug
) (21 U.S.C. §§ 331(c) and 333)
)
) Count Ten:
) Conspiracy to Commit Health Care Fraud
) (18 U.S.C. § 1349)
)
) Money Laundering Forfeiture Allegation:
) (18 U.S.C. § 982(a)(1))
)
) Import Violation Forfeiture Allegation:
) (18 U.S.C. §§ 545, 982(a)(2)(B), 19 U.S.C.
) § 1703, & 28 U.S.C. § 2461(c))

I hereby certify on 2-28-25 that the
foregoing document is true and correct copy of the
☐ electronic docket in the captioned case
☒ electronically filed original filed on 2-28-21
☐ original filed in my office on _____

Robert M. Farrell
Acting Clerk, U.S. District Court
District of Massachusetts

By: 
Deputy Clerk

SUPERSEDING INDICTMENT

At all times relevant to this Superseding Indictment:

General Allegations

1. Defendant Rahim Shafa ("SHAFa") was a psychiatrist who owned and operated Novel Psychopharmacology ("Novel"). Novel maintained clinics in Milford and Natick, Massachusetts.

2. Defendant Nahid Tormosi Shafa a/k/a Nahid Tormosi ("TORMOSI") was the spouse of SHAFa and the office manager for Novel.

3. SHAFa and TORMOSI resided in Lexington, Massachusetts.

4. Person 1 is an individual known to the Grand Jury who resided in Hong Kong.

Federal Food, Drug and Cosmetic Act

5. The United States Food and Drug Administration ("FDA") is the federal agency responsible for protecting the health and safety of the American public by enforcing the Federal Food Drug and Cosmetic Act ("FDCA"). The FDCA regulates the manufacture, labeling, and distribution of all prescription drugs shipped or received in interstate commerce.

6. A "drug" is defined by the FDCA as, among other things, an article intended for use in the diagnosis, cure, mitigation, treatment, or prevention of a disease in a human or other animal; an article (other than food) intended to affect the structure or any function of the body of a human or other animal; and an article intended for use as a component of any such articles. *See* 21 U.S.C. §§ 321(g)(1)(B)-(D).

7. Under the FDCA, drugs that only may be dispensed upon a written prescription of a licensed practitioner (i.e., prescription drugs) include any "drug intended for use by man which because of its toxicity or other potentiality for harmful effect, or the method of its use, or the collateral measures necessary to its use, is not safe except under the supervision of a practitioner licensed by law to administer such drug." 21 U.S.C. § 353(b)(1)(A).

8. Pursuant to the FDCA, a drug is deemed to be “misbranded” if it does not meet certain requirements of the statute, including, among other things, if its labeling fails to bear adequate directions for use, 21 U.S.C. § 352(f)(1). Non-FDA approved prescription drugs do not meet this requirement (or qualify for exemption from it) and are thus considered misbranded. *See* 21 C.F.R. §§ 201.5 and 201.100.

9. A drug in a package form is misbranded under the FDCA if it does not bear a label providing the name and place of business of the manufacturer, packer, or distributor. 21 U.S.C. § 352(b).

10. A prescription drug is also misbranded under the FDCA if, at any time prior to dispensing, the label of the drug fails to bear the symbol “Rx only.” 21 U.S.C. § 353(b)(4)(A).

11. The FDA has approved several drugs that contain the active pharmaceutical ingredient disulfiram for the treatment of alcohol dependence. The drugs containing disulfiram that the FDA has approved for use in the United States are in tablet form for oral ingestion. Disulfiram is also available in two additional forms, as a liquid injection and as a pellet implant. The FDA has not approved either the injectable form or the pellet implant for use in the United States.

12. In addition, the FDA has approved several drugs that contain the active pharmaceutical ingredient naltrexone for alcohol and opioid dependence. The FDA has approved naltrexone for use in the United States in two forms: as a tablet for oral injection and as a liquid for injection. Naltrexone is available in a third form – as a pellet implant – which can be manufactured to last for varying amounts of time in the human body (6 months, 10 months or 12 months, for example). The FDA has not approved the use of the naltrexone pellet implant

(for any amount of time) in the United States, and the sale and receipt of a naltrexone pellet implant in the United States is unlawful.

Overview of Money Laundering Conspiracy

13. From in or about January 2008 through in or about January 2018, SHAFa, TORMOSI, and Person 1 conspired to transmit funds from the United States to Hong Kong to purchase naltrexone pellet implants, disulfiram pellet implants and disulfiram injections that were unlawfully shipped from Hong Kong to SHAFa and TORMOSI in the United States.

Manner and Means of the Money Laundering Conspiracy

14. SHAFa and TORMOSI emailed Person 1 to request naltrexone pellet implants, disulfiram pellet implants and disulfiram injections.

15. SHAFa and TORMOSI used credit cards – including a MasterCard ending in -4939 and a Visa ending in -8756 – to purchase the naltrexone pellet implants, disulfiram pellet implants and disulfiram injections from Person 1 in Hong Kong.

16. SHAFa and TORMOSI completed order forms for naltrexone pellet implants, disulfiram pellet implants and disulfiram injections, and then transmitted those order forms to Person 1. The order forms included a section where SHAFa and TORMOSI provided a name, signature and credit card information, among other information.

17. SHAFa and TORMOSI further accepted packages sent from Person 1 containing naltrexone pellet implants, disulfiram pellet implants and disulfiram injections.

18. SHAFa and TORMOSI received money from patients in exchange for providing naltrexone pellet implants, disulfiram pellet implants and disulfiram injections.

Acts in Furtherance of the Money Laundering Conspiracy

19. From in or about January 2008 through in or about January 2018, SHAFa, TORMOSI and Person 1 committed and caused to be committed the following acts, among others, in furtherance of the money laundering conspiracy:

- a. On or about June 29, 2016, SHAFa and TORMOSI ordered or caused to be ordered from Person 1 naltrexone pellet implants at a cost of approximately \$23,130. SHAFa and TORMOSI used or caused to be used the -4939 MasterCard for this purchase. On or about June 30, 2016, Person 1 shipped or caused to be shipped naltrexone pellet implants from Hong Kong to SHAFa and TORMOSI in Massachusetts.
- b. On or about November 12, 2017, SHAFa and TORMOSI ordered or caused to be ordered from Person 1 naltrexone pellet implants, naltrexone injections and disulfiram pellet implants at a cost of approximately \$15,308. SHAFa and TORMOSI used or caused to be used the -8756 Visa for this purchase. On or about November 17, 2017, Person 1 shipped or caused to be shipped naltrexone pellet implants, naltrexone injections and disulfiram pellet implants from Hong Kong to SHAFa and TORMOSI in Massachusetts.
- c. On or about January 3, 2018, SHAFa and TORMOSI ordered or caused to be ordered from Person 1 disulfiram pellet implants at a cost of approximately \$638. SHAFa and TORMOSI used or caused to be used the -8756 Visa for this purchase. On or about January 3, 2018, Person 1 shipped or caused to be shipped disulfiram pellet implants from Hong Kong to SHAFa and TORMOSI in Massachusetts.

Overview and Object of Conspiracy to Defraud the United States

20. From in or about June 2008 through in or about January 2018, SHAFa and Person 1 conspired with each other to defraud the United States, namely Immigration and Customs Enforcement and the FDA, by mislabeling shipments of naltrexone pellet implants, disulfiram pellet implants and disulfiram injections. The object of the conspiracy was to conceal the contents of the shipments and make them appear as though they were lawful imports.

Manner and Means of the Conspiracy to Defraud the United States

21. The manner and means by which SHAFa and Person 1 carried out the conspiracy included falsifying shipping documents and packing slips for the shipments.

Acts in Furtherance of the Conspiracy to Defraud the United States

22. From in or about June 2008 through in or about January 2018, SHAFa and Person 1 committed and caused to be committed the following acts, among others, in furtherance of the conspiracy:

a. On or about June 30, 2016, Person 1 mailed or caused to be mailed a package that was addressed to and received by SHAFa in Massachusetts. Although that package actually contained naltrexone pellet implants, the shipping documents and packing slip falsely claimed that the package contained plastic beads in plastic tubes, and further misrepresented the value of the package contents.

b. On or about November 17, 2017, Person 1 mailed or caused to be mailed a package that was addressed to and received by SHAFa in Massachusetts. Although that package actually contained naltrexone pellet implants, the shipping documents and packing slip falsely claimed that the package contained plastic beads in plastic tubes, and further misrepresented the value of the package contents.

c. On or about January 3, 2018, Person 1 mailed or caused to be mailed a package that was addressed to and received by SHAFa in Massachusetts. Although that package actually contained disulfiram implants, the shipping documents and packing slip falsely claimed that the package contained plastic beads in plastic tubes, and further misrepresented the value of the package contents.

Overview of the Health Care Fraud Conspiracy

23. From in or about April 2016 through in or about January 2019, SHAFa and TORMOSI engaged in a conspiracy to commit health care fraud. The principal purpose of the conspiracy to commit health care fraud was to receive reimbursements from Medicare for false and fraudulent claims for service.

Manner and Means of the Health Care Fraud Conspiracy and the Scheme to Defraud

24. SHAFa, TORMOSI and others created patient schedules for false and fraudulent claims of service.

25. SHAFa, TORMOSI and others noted on these patient schedules certain codes that were to be used to bill Medicare for the false and fraudulent claims of service.

26. SHAFa, TORMOSI and others sent or caused to be sent the false patient schedules to Novel's third-party billing company.

27. SHAFa and TORMOSI caused the third-party billing company to bill Medicare on behalf of SHAFa for the false and fraudulent claims of service.

28. SHAFa and TORMOSI received false and fraudulent Medicare reimbursements into bank accounts controlled by SHAFa and TORMOSI.

Acts in Furtherance of the Health Care Fraud Conspiracy

29. From in or about April 2016 through in or about January 2019, SHAFa and TORMOSI committed and caused to be committed the following acts, among others, in furtherance of the conspiracy:

- a. On or about December 12, 2016, SHAFa and TORMOSI filed or caused to be filed a claim for reimbursement from Medicare for an alleged November 19, 2016 office visit for Patient 1 despite the fact that SHAFa was outside the United States on November 19, 2016.
- b. On or about September 8, 2017, SHAFa and TORMOSI filed or caused to be filed a claim for reimbursement from Medicare for an alleged August 22, 2017 office visit for Patient 2 despite the fact that SHAFa was outside the United States on August 22, 2017.
- c. On or about May 9, 2018, SHAFa and TORMOSI filed or caused to be filed a claim for reimbursement from Medicare for an alleged April 17, 2018 office visit for Patient 2 despite the fact that SHAFa was outside the United States on April 17, 2018.
- d. On or about July 9, 2018, SHAFa and TORMOSI filed or caused to be filed a claim for reimbursement from Medicare for an alleged May 31, 2018 office visit for Patient 3 despite the fact that SHAFa was outside the United States on May 31, 2018.
- e. On or about December 24, 2018, SHAFa and TORMOSI filed or caused to be filed a claim for reimbursement from Medicare for an alleged December 8, 2018 office visit for Patient 4 despite the fact that SHAFa was outside the United States on December 8, 2018.

COUNT ONE
Conspiracy to Commit International Money Laundering
(18 U.S.C. § 1956(h))

The Grand Jury charges:

30. The Grand Jury re-alleges and incorporates by reference paragraphs 1-19 of this Superseding Indictment.

31. From in or about July 2008 through in or about January 2018, in the District of Massachusetts, and elsewhere, the defendants,

RAHIM SHAFa and NAHID TORMOSI SHAFa, a/k/a NAHID TORMOSI, conspired with each other and with Person 1 to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, importing merchandise contrary to law, in violation of Title 18, United States Code, Section 545, in violation of Title 18 United States Code, Section 1956(a)(2)(A).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO
International Money Laundering; Aiding and Abetting
(18 U.S.C. §§ 1956 and 2)

The Grand Jury further charges:

32. The Grand Jury re-alleges and incorporates by reference paragraphs 1-19 of this Superseding Indictment.

33. On or about June 30, 2016, in the District of Massachusetts, and elsewhere, the defendant,

RAHIM SHAFI,

transported, transmitted and transferred, and attempted to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, importing merchandise contrary to law, in violation of Title 18, United States Code, Section 545.

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THREE

International Money Laundering; Aiding and Abetting
(18 U.S.C. §§ 1956 and 2)

The Grand Jury further charges:

34. The Grand Jury re-alleges and incorporates by reference paragraphs 1-19 of this Superseding Indictment.

35. On or about November 13, 2017, in the District of Massachusetts, and elsewhere, the defendant,

RAHIM SHAFI,

transported, transmitted and transferred, and attempted to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, importing merchandise contrary to law, in violation of Title 18, United States Code, Section 545.

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT FOUR

International Money Laundering; Aiding and Abetting
(18 U.S.C. §§ 1956 and 2)

The Grand Jury further charges:

36. The Grand Jury re-alleges and incorporates by reference paragraphs 1-19 of this Superseding Indictment.

37. On or about January 3, 2018, in the District of Massachusetts, and elsewhere, the defendant,

RAHIM SHAFI,

transported, transmitted and transferred, and attempted to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, importing merchandise contrary to law, in violation of Title 18, United States Code, Section 545.

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT FIVE
Conspiracy to Defraud the United States
(18 U.S.C. § 371)

The Grand Jury further charges:

38. The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 and 20-22 of this Superseding Indictment.

39. From in or about July 2008 through in or about January 2018, in the District of Massachusetts, and elsewhere, the defendant,

RAHIM SHAFI,

conspired with Person 1 to defraud the United States and any agency thereof, namely, United States Immigration and Customs Enforcement and the United States Food and Drug Administration, in any manner and for any purpose, to wit: impeding, impairing, obstructing, and defeating the lawful functions of such agencies.

All in violation of Title 18, United States Code, Section 371.

COUNTS SIX - EIGHT
Importing Merchandise Contrary to Law; Aiding and Abetting
(18 U.S.C. §§ 545 and 2)

The Grand Jury further charges:

40. The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 and 22 of this Superseding Indictment.

41. On or about the dates listed below, in the District of Massachusetts, and elsewhere, the defendant,

RAHIM SHAFa,

did fraudulently and knowingly import and bring into the United States any merchandise contrary to law and receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment and sale of such merchandise after importation, knowing the same to have been imported and brought into the United States contrary to law, as set forth below:

COUNT	DATE	MERCHANDISE
SIX	June 30, 2016	Naltrexone Pellet Implants
SEVEN	November 17, 2017	Naltrexone Pellet Implants
EIGHT	January 3, 2018	Disulfiram Pellet Implants

All in violation of Title 18, United States Code, Sections 545 and 2.

COUNT NINE

Receipt and Delivery of Misbranded Drug
(21 U.S.C. §§ 331(c) and 333(a)(2))

The Grand Jury further charges:

42. The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 and 22 of this Superseding Indictment.

43. On or about June 30, 2016, in the District of Massachusetts, and elsewhere, the defendant,

RAHIM SHAFI,

with the intent to defraud and mislead, received in interstate commerce misbranded prescription drugs, to wit: naltrexone pellet implants, and thereafter delivered and proffered delivery of such misbranded prescription drugs for pay and otherwise.

All in violation of Title 21, United States Code, Sections 331(c) and 333(a)(2).

COUNT TEN
Conspiracy to Commit Health Care Fraud
(18 U.S.C. § 1349)

The Grand Jury further charges:

44. The Grand Jury re-alleges and incorporates by reference paragraphs 1-3 and 23-29 of this Superseding Indictment.

45. From in or about April 2016 through in or about January 2019, in Milford and Natick, in the District of Massachusetts, and elsewhere, the defendants,

RAHIM SHAFI and NAHID TORMOSI SHAFI, a/k/a NAHID TORMOSI, conspired with each other and with others known and unknown to the Grand Jury to commit health care fraud, that is, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a health care program, that is Medicare, and did knowingly and willfully obtain by false and fraudulent pretenses, representations and promises money and property owned by and under the custody and control of a health care benefit program, that is Medicare, in connection with the delivery of and payment for health care benefits, items and services, in violation of 18 U.S.C. § 1347.

All in violation of Title 18, United States Code, Section 1349.

MONEY LAUNDERING FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(1))

46. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1956(a)(2) and (h), set forth in Counts One through Four, the defendants,

RAHIM SHAFa and
NAHID TORMOSI SHAFa, a/k/a/ NAHID TORMOSI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property.

47. If any of the property described in Paragraph 46, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants --

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

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 46 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

IMPORT VIOLATION FORFEITURE ALLEGATION
(18 U.S.C. §§ 545 and 982(a)(2)(B), 19 U.S.C. § 1703, and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

48. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 545, set forth in Counts Six through Eight, the defendant,

RAHIM SHAFI,

shall forfeit to the United States: (1) pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such offenses; (2) pursuant to Title 18, United States Code, Section 545 and Title 28, United States Code, Section 2461(c), merchandise introduced into the United States in violation of Section 545, or the value thereof; and (3) pursuant to Title 19, United States Code, Section 1703 and Title 28, United States Code, Section 2461(c), any vessel and its cargo employed, or attempted to be employed, to defraud the revenue or to smuggle merchandise in violation of law. The property to be forfeited includes, but is not limited to, the following:

a. \$553,714.50, to be entered in the form of a forfeiture money judgment.

49. If any of the property described in Paragraph 48, above, as being forfeitable, as a result of any act or omission of the defendant --


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

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 48 above.

All pursuant to Title 18, United States Code, Sections 545 and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON


JOHN T. MULCAHY
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JULY 8, 2021
Returned into the District Court by the Grand Jurors and filed.

/s/ Dawn M. King 1:20pm
DEPUTY CLERK

ATTACHMENT C

Entered
2/9/24
@
3:25P
RM

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

RAHIM SHAFa and
NAHID TORMOSI SHAFa

Defendants.

)
)
)
) Docket No. 20-CR-40021-MRG
)
)
)

VERDICT FORM AS TO RAHIM SHAFa

I hereby certify, on 2-9-24, that the
foregoing document is true and correct copy of the
☐ electronic docket in the captioned case
☒ electronically filed original filed on 2-9-24
☐ original filed in my office on _____

Robert M. Farrall
Acting Clerk, U.S. District Court
District of Massachusetts

By: 
Deputy Clerk

FINAL VERSION

COUNT ONE

As to Count One, Conspiracy to Commit International Money Laundering:

We, the Jury, find the Defendant, Rahim Shafa:

☒ Not Guilty

☐ Guilty

So Say We All, this 9th day of February, 2024

Foreperson: *Musa Snow*

COUNT TWO

As to Count Two, International Money Laundering, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

So Say We All, this 9th day of February, 2024

Foreperson: Lisa Snow

COUNT THREE

As to Count Three, International Money Laundering, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

So Say We All, this 9th day of February, 2024

Foreperson: Linda Snow

COUNT FOUR

As to Count Four, International Money Laundering, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

So Say We All, this 21 day of February, 2024

Foreperson: *Kura Snow*

COUNT FIVE

As to Count Five, Conspiracy to Defraud the United States:

We, the Jury, find the Defendant, Rahim Shafa:

☒ Not Guilty

☐ Guilty

So Say We All, this 9th day of February, 2024

Foreperson: *Lisa Snow*

COUNT SIX

As to Count Six, Knowingly Importing Merchandise Contrary to Law, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

As to Count Six, Receiving, concealing, buying, selling, or facilitating the transportation, concealment, or sale of unlawfully imported merchandise, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

So Say We All, this 9th day of February, 2024

Foreperson: Travis Snow

COUNT SEVEN

As to Count Seven Knowingly Importing Merchandise Contrary to Law, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

As to Count Seven, Receiving, concealing, buying, selling, or facilitating the transportation, concealment, or sale of unlawfully imported merchandise, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

So Say We All, this 14 day of February, 2024

Foreperson: Linda Snow

COUNT EIGHT

As to Count Eight Knowingly Importing Merchandise Contrary to Law, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

As to Count Eight, Receiving, concealing, buying, selling, or facilitating the transportation, concealment, or sale of unlawfully imported merchandise, and/or Aiding and Abetting the same:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

So Say We All, this 9th day of February, 2024

Foreperson: *Amanda Snow*

COUNT NINE

As to Count Nine, Receipt and Delivery of a Misbranded Drug:

We, the Jury, find the Defendant, Rahim Shafa:

☐ Not Guilty

☒ Guilty

If guilty (above): We, the jury, unanimously find the defendant, Rahim Shafa, acted

without (with/without) the intent to defraud.

So Say We All, this 9th day of February, 2024

Foreperson: Juan Snow

COUNT TEN

As to Count Ten, Conspiracy to Commit Health Care Fraud:

We, the Jury, find the Defendant, Rahim Shafa:

☒ Not Guilty

☐ Guilty

So Say We All, this 9th day of February, 2024

Foreperson: Laura Snow

ATTACHMENT D

UNITED STATES DISTRICT COURT

District of Massachusetts

AMENDED

UNITED STATES OF AMERICA

v.

Rahim Shafa

JUDGMENT IN A CRIMINAL CASE

Case Number: 4:20-CR-40021-MRG

USM Number: 04400-509

R. Bradford Bailey

Defendant's Attorney

THE DEFENDANT:

- ☐ pleaded guilty to count(s) _____
- ☐ pleaded nolo contendere to count(s) _____
which was accepted by the court.
- ☒ was found guilty on count(s) 2s-4s, 6s-8s & 9s
after a plea of not guilty.

The defendant is adjudicated guilty of these offenses:

Title & Section	Nature of Offense	Offense Ended	Count
18 USC § 1956(a)(2)(A)	International Money Laundering	6/13/2016	2s
18 USC § 1956(a)(2)(A)	International Money Laundering	11/13/2017	3s
18 USC § 1956(a)(2)(A)	International Money Laundering	1/3/2018	4s

The defendant is sentenced as provided in pages 2 through 10 of this judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

- ☒ The defendant has been found not guilty on count(s) 1s, 5s & 10s
- ☒ Count(s) Underlying Indictment ☒ is ☐ are dismissed on the motion of the United States.

It is ordered that the defendant must notify the United States attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States attorney of material changes in economic circumstances.

12/16/2024

Date of Imposition of Judgment

/s/ Margaret R. Guzman

Signature of Judge

Margaret R. Guzman, United States District Judge

Name and Title of Judge

2/12/2025

Date

I hereby certify on 2-12-25 that the foregoing document is true and correct copy of the

- ☐ electronic docket in the captioned case
- ☒ electronically filed original filed on 2-12-25
- ☐ original filed in my office on _____

Robert M. Farrell
Acting Clerk, U.S. District Court
District of Massachusetts

By: 
Deputy Clerk

DEFENDANT: Rahim Shafa

CASE NUMBER: 4:20-CR-40021-MRG

ADDITIONAL COUNTS OF CONVICTION

<u>Title & Section</u>	<u>Nature of Offense</u>	<u>Offense Ended</u>	<u>Count</u>
18 U.S.C. § 545	Importing Merchandise Contrary to Law	6/30/2016	6s
18 U.S.C. § 545	Importing Merchandise Contrary to Law	11/17/2017	7s
18 U.S.C. § 545	Importing Merchandise Contrary to Law	1/3/2018	8s
21 U.S.C. § 331(c)	Receipt and Delivery of Misbranded Drug	6/30/2016	9s

DEFENDANT: Rahim Shafa
CASE NUMBER: 4:20-CR-40021-MRG

IMPRISONMENT

The defendant is hereby committed to the custody of the Federal Bureau of Prisons to be imprisoned for a total term of:

36 months, all Counts to be served concurrently.

☐ The court makes the following recommendations to the Bureau of Prisons:

☐ The defendant is remanded to the custody of the United States Marshal.

☐ The defendant shall surrender to the United States Marshal for this district:

☐ at _____ ☐ a.m. ☐ p.m. on _____.

☐ as notified by the United States Marshal.

☒ The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons:

☒ before 2 p.m. on 2/28/2025.

☐ as notified by the United States Marshal.

☐ as notified by the Probation or Pretrial Services Office.

RETURN

I have executed this judgment as follows:

Defendant delivered on _____ to _____
at _____, with a certified copy of this judgment.

UNITED STATES MARSHAL

By _____
DEPUTY UNITED STATES MARSHAL

DEFENDANT: Rahim Shafa

CASE NUMBER: 4:20-CR-40021-MRG

SUPERVISED RELEASE

Upon release from imprisonment, you will be on supervised release for a term of:

36 months, all Counts to be served concurrently.

MANDATORY CONDITIONS

1. You must not commit another federal, state or local crime.
2. You must not unlawfully possess a controlled substance.
3. You must refrain from any unlawful use of a controlled substance. You must submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.
 - ☒ The above drug testing condition is suspended, based on the court's determination that you pose a low risk of future substance abuse. *(check if applicable)*
4. ☒ You must make restitution in accordance with 18 U.S.C. §§ 3663 and 3663A or any other statute authorizing a sentence of restitution. *(check if applicable)*
5. ☒ You must cooperate in the collection of DNA as directed by the probation officer. *(check if applicable)*
6. ☐ You must comply with the requirements of the Sex Offender Registration and Notification Act (34 U.S.C. § 20901, et seq.) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in the location where you reside, work, are a student, or were convicted of a qualifying offense. *(check if applicable)*
7. ☐ You must participate in an approved program for domestic violence. *(check if applicable)*

You must comply with the standard conditions that have been adopted by this court as well as with any other conditions on the attached page.

DEFENDANT: Rahim Shafa

CASE NUMBER: 4:20-CR-40021-MRG

STANDARD CONDITIONS OF SUPERVISION

As part of your supervised release, you must comply with the following standard conditions of supervision. These conditions are imposed because they establish the basic expectations for your behavior while on supervision and identify the minimum tools needed by probation officers to keep informed, report to the court about, and bring about improvements in your conduct and condition.

1. You must report to the probation office in the federal judicial district where you are authorized to reside within 72 hours of your release from imprisonment, unless the probation officer instructs you to report to a different probation office or within a different time frame.
2. After initially reporting to the probation office, you will receive instructions from the court or the probation officer about how and when you must report to the probation officer, and you must report to the probation officer as instructed.
3. You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.
4. You must answer truthfully the questions asked by your probation officer.
5. You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
6. You must allow the probation officer to visit you at any time at your home or elsewhere, and you must permit the probation officer to take any items prohibited by the conditions of your supervision that he or she observes in plain view.
7. You must work full time (at least 30 hours per week) at a lawful type of employment, unless the probation officer excuses you from doing so. If you do not have full-time employment you must try to find full-time employment, unless the probation officer excuses you from doing so. If you plan to change where you work or anything about your work (such as your position or your job responsibilities), you must notify the probation officer at least 10 days before the change. If notifying the probation officer at least 10 days in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
8. You must not communicate or interact with someone you know is engaged in criminal activity. If you know someone has been convicted of a felony, you must not knowingly communicate or interact with that person without first getting the permission of the probation officer.
9. If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.
10. You must not own, possess, or have access to a firearm, ammunition, destructive device, or dangerous weapon (i.e., anything that was designed, or was modified for, the specific purpose of causing bodily injury or death to another person such as nunchakus or tasers).
11. You must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.
12. If the probation officer determines that you pose a risk to another person (including an organization), the probation officer may require you to notify the person about the risk and you must comply with that instruction. The probation officer may contact the person and confirm that you have notified the person about the risk.
13. You must follow the instructions of the probation officer related to the conditions of supervision.

U.S. Probation Office Use Only

A U.S. probation officer has instructed me on the conditions specified by the court and has provided me with a written copy of this judgment containing these conditions. For further information regarding these conditions, see *Overview of Probation and Supervised Release Conditions*, available at: www.uscourts.gov.

Defendant's Signature _____

Date _____

DEFENDANT: Rahim Shafa
CASE NUMBER: 4:20-CR-40021-MRG

SPECIAL CONDITIONS OF SUPERVISION

1. You must not knowingly have any contact, direct or indirect, with any of the witnesses who testified on behalf of the Government at trial.
2. You must pay the balance of any fine or restitution imposed according to a court-ordered repayment schedule.
3. You are prohibited from incurring new credit charges or opening additional lines of credit without the approval of the Probation Office while any financial obligations remain outstanding.
4. You must provide the Probation Officer access to any requested financial information, which may be shared with the Asset Forfeiture Unit of the US Attorney's Office.

DEFENDANT: Rahim Shafa

CASE NUMBER: 4:20-CR-40021-MRG

CRIMINAL MONETARY PENALTIES


The defendant must pay the total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>Restitution</u>	<u>Fine</u>	<u>AVAA Assessment*</u>	<u>JVTA Assessment**</u>
TOTALS	\$ 625.00	\$ 115,765.00	\$ 150,000.00	\$	\$

☐ The determination of restitution is deferred until _____. An Amended Judgment in a Criminal Case (AO 245C) will be entered after such determination.

☒ The defendant must make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss***</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
		\$3,260.00	
		\$3,600.00	
		\$2,960.00	
		\$500.00	
		\$2,960.00	
		\$2,960.00	
		\$2,960.00	
		\$3,260.00	
		\$1,460.00	
	\$2,960.00		
TOTALS	\$ 0.00	\$ 100,005.00	

☐ Restitution amount ordered pursuant to plea agreement \$ _____

☐ The defendant must pay interest on restitution and a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).

☐ The court determined that the defendant does not have the ability to pay interest and it is ordered that:

☐ the interest requirement is waived for the ☐ fine ☐ restitution.

☐ the interest requirement for the ☐ fine ☐ restitution is modified as follows:


* Amy, Vicky, and Andy Child Pornography Victim Assistance Act of 2018, Pub. L. No. 115-299.

** Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22.

*** Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT: Rahim Shafa
CASE NUMBER: 4:20-CR-40021-MRG

ADDITIONAL RESTITUTION PAYEES

<u>Name of Payee</u>	<u>Total Loss*</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
		\$3,260.00	
		\$3,260.00	
		\$3,000.00	
		\$3,300.00	
		\$3,320.00	
		\$3,300.00	
		\$3,610.00	
		\$3,125.00	
		\$3,300.00	
		\$3,610.00	
		\$3,300.00	
		\$4,210.00	
		\$3,910.00	
		\$3,900.00	
		\$3,300.00	
		\$3,320.00	
		\$3,300.00	
		\$3,260.00	
		\$725.00	
		\$75.00	
		\$1,660.00	
		\$1,660.00	
		\$1,650.00	
		\$1,650.00	
		\$1,960.00	
		\$2,160.00	

* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

**See Additional Restitution Payees Addendum

DEFENDANT: Rahim Shafa

CASE NUMBER: 4:20-CR-40021-MRG

ADDITIONAL TERMS FOR CRIMINAL MONETARY PENALTIES

The Court orders forfeiture in the amount of \$122,900, which corresponds to proceeds the Defendant received as a result of the offenses of conviction described in Counts 6s through 8s of the Indictment.

This forfeiture order is statutorily required.

DEFENDANT: Rahim Shafa
CASE NUMBER: 4:20-CR-40021-MRG

SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties is due as follows:

- A ☐ Lump sum payment of \$ _____ due immediately, balance due
- ☐ not later than _____, or
☐ in accordance with ☐ C, ☐ D, ☐ E, or ☐ F below; or
- B ☐ Payment to begin immediately (may be combined with ☐ C, ☐ D, or ☐ F below); or
- C ☐ Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after the date of this judgment; or
- D ☐ Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or
- E ☐ Payment during the term of supervised release will commence within _____ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or
- F ☒ Special instructions regarding the payment of criminal monetary penalties:
Any payment made, that is not payment in full, shall be divided proportionately among the parties identified by the government.
All restitution payments shall be made to the Clerk, U.S. District Court for transfer to the identified victims. The defendant shall notify the United States Attorney for this district within 30 days of any change of mailing or residence address that occurs while any portion of the restitution remains unpaid.

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during the period of imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

☐ Joint and Several

Case Number Defendant and Co-Defendant Names (including defendant number)	Total Amount	Joint and Several Amount	Corresponding Payee, if appropriate
---	--------------	-----------------------------	--

- ☐ The defendant shall pay the cost of prosecution.
- ☐ The defendant shall pay the following court cost(s):
- ☒ The defendant shall forfeit the defendant's interest in the following property to the United States:
See order of forfeiture dated 12/16/2024.

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) AYAA assessment, (5) fine principal, (6) fine interest, (7) community restitution, (8) JVT A assessment, (9) penalties, and (10) costs, including cost of prosecution and court costs.