



3. A controlled substance assigned to “Schedule II” meant that the drug had a high potential for abuse, the drug had a currently accepted medical use in treatment in the United States, or the drug had a currently accepted medical use with severe restrictions.

4. Pursuant to the CSA and its implementing regulations:

a. Oxycodone was classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(b)(1)(xiii). Oxycodone, sometimes prescribed under brand names, including Roxicodone, was used to treat severe pain. Oxycodone, as with other opioids, was highly addictive.

b. Hydrocodone was classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(b)(1)(vi). Hydrocodone, sometimes prescribed under brand names including Norco, Lortab, and Vicodin, was used to treat moderate to moderately severe pain. Hydrocodone, as with other opioids, was highly addictive.

c. Carisoprodol, was classified as a Schedule IV controlled substance. Carisoprodol, sometimes prescribed under the brand name Soma, was a purported muscle relaxant and was highly addictive. The U.S. Food and Drug Administration recommends carisoprodol only for acute treatment for two to three weeks at a time.

5. The combination of high-dose opioids, including oxycodone or hydrocodone, and carisoprodol significantly increased the risk of patient intoxication and overdose. Moreover, prescribing or dispensing oxycodone or hydrocodone and carisoprodol often created a significant risk of diversion because the two drugs, prescribed or dispensed together, were often highly abused and sought for a non-legitimate medical purpose due to the increased “high” a user may experience from taking hydrocodone or oxycodone along with carisoprodol.

6. Accordingly, for a treating physician to prescribe the combination of high-dose opioids and carisoprodol for a legitimate medical purpose, the physician needed to determine, at a minimum, that the benefits of the drugs outweighed the risks to the patient’s life.

7. Medical practitioners, such as pharmacists, physicians, and nurse practitioners, who were authorized to prescribe, dispense, or distribute controlled substances by the jurisdiction in which they were licensed to practice were authorized under the CSA to prescribe, dispense, or otherwise distribute, controlled substances, if they were registered with the Attorney General of the United States. 21 U.S.C. § 822(b). Upon application by the practitioner, the U.S. Drug Enforcement Administration (“DEA”) assigned a unique registration number to each qualifying medical practitioner including physicians, pharmacies, and nurse practitioners. Under Texas law, nurse practitioners were limited to prescribing Schedule III through Schedule V controlled substances.

8. Chapter 21 of the Code of Federal Regulations, Section 1306.04 governed the issuance of prescriptions and provided, among other things, that a prescription for a controlled substance “must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice.” Moreover, “[a]n order purporting to be a prescription issued not in the usual course of professional treatment . . . is not a prescription within the meaning and intent of [the CSA] and the person knowingly filling such a purported prescription, as well as the person issuing it, shall be subject to the penalties provided for violations of the provisions of law relating to controlled substances.”

9. Chapter 21 of the Code of Federal Regulations, Section 1306.06 governed the filling of prescriptions and provided: “A prescription for a controlled substance may only be filled by a pharmacist, acting in the usual course of his professional practice and either registered

individually or employed in a registered pharmacy, a registered central fill pharmacy, or registered institutional practitioner.”

10. All prescriptions for controlled substances were required to be “dated as of, and signed on, the day when issued and [ ] bear the full name and address of the patient, the drug name, strength, dosage form, quantity prescribed, directions for use, and the name, address and registration number of the practitioner.” 21 C.F.R. § 1306.05(a). “The refilling of a prescription for a controlled substance listed in Schedule II [was] prohibited.” 21 C.F.R. § 1306.12(a); 21 U.S.C. § 829(a).

11. The Texas Prescription Monitoring Program (“PMP”) was a database of all reported prescriptions for controlled substances that were issued and dispensed in Texas. The database was maintained by the Texas Department of Public Safety (“DPS”) up until September 1, 2016, and thereafter by the Texas State Board of Pharmacy (“TSBP”). Pharmacies were required to report to the PMP all controlled substances dispensed, including: the patient’s name, the particular controlled substance and dosage dispensed, the quantity dispensed, the number of days supplied, the prescribing physician’s name, the date the prescription was issued, the dispensing pharmacy’s name, the type of payment, and the date the controlled substances were dispensed.

12. TSBP Rule 291.29 related to the Professional Responsibility of Pharmacists, and instructed a pharmacist to make every reasonable effort to ensure that any prescription drug order was issued for a “legitimate medical purpose by a practitioner in the course of medical practice.”

13. TSBP Rule 291.29(c) provided reasons to suspect that a prescription may have been authorized in the absence of a valid patient–practitioner relationship or contrary to the practitioner’s standard of practice, including:

- a. a disproportionate number of patients of the practitioner receive controlled substances;
- b. the manner in which the prescriptions are authorized by the practitioner or received by the pharmacy;
- c. the geographical distance between the practitioner and the patient or between the pharmacy and the patient; and
- d. knowledge by the pharmacist that the patient has exhibited doctor-shopping or pharmacy-shopping tendencies.

14. When pharmacies obtained a pharmacy license, TSBP distributed to pharmacies a document called: “Red Flags Check List for Pharmacies, YOU MIGHT BE A PILL MILL IF...,” which largely mimicked TSBP Rule 291.29(f). The document identified the following “red flags,” among others, related to non-therapeutic dispensing of controlled substances:

- a. the pharmacy dispenses a reasonably discernible pattern of substantially identical prescriptions for the same controlled substances, potentially paired with other drugs, for numerous persons, indicating a lack of individual drug therapy in prescriptions issued by the practitioner;
- b. the pharmacy operates with limited hours of operation or closes after a certain threshold of controlled substance prescriptions are dispensed;
- c. prescriptions by a prescriber presented to the pharmacy are routinely for controlled substances commonly known to be abused drugs, including opioids, benzodiazepines, muscle relaxants, psychostimulants, and/or cough syrups containing codeine, or any combination of these drugs;
- d. prescriptions for controlled substances are commonly for the highest strength of the drug and/or for large quantities (e.g., monthly supply), indicating a lack of individual drug therapy in prescriptions issued by the practitioner;

e. dangerous drugs or over-the-counter products (e.g., multi-vitamins or laxatives) are consistently added by the prescriber to prescriptions for controlled substances presented to the pharmacy, indicating a lack of individual drug therapy in prescriptions issued by the practitioner;

f. the practitioner's clinic is not registered as, and not exempted from registration as, a pain management clinic by the Texas Medical Board, despite prescriptions by the practitioner presented to the pharmacy indicating that the practitioner is mostly prescribing opioids, benzodiazepines, barbiturates, or carisoprodol, but not including suboxone, or any combination of these drugs;

g. the controlled substance(s) or the quantity of the controlled substance(s) prescribed are inconsistent with the practitioner's area of medical practice;

h. the Texas Prescription Monitoring Program indicates the person presenting the prescriptions is obtaining similar drugs from multiple practitioners, and/or that the persons is being dispensed similar drugs at multiple pharmacies;

i. persons pay with cash or credit card more often than insurance;

j. the pharmacy charges and persons are willing to pay more for controlled substances than they would at a nearby pharmacy;

k. sporadic and non-consistent dispensing volume (including zero dispensing) varies from day to day, and week to week; and

l. the pharmacy routinely orders controlled substances from more than one drug supplier.

**ENTITIES, DEFENDANTS, AND RELEVANT INDIVIDUALS**

15. SunnySide Medical, PLLC, which did business as SunnySide Wellness ("SUNNYSIDE WELLNESS") had two locations. SUNNYSIDE WELLNESS, located at 4561 Edfield Street, Suite A, Houston, Texas 77051 (SUNNYSIDE #1), was opened in or around May 2018. The second SUNNYSIDE WELLNESS was located at 5400 Pinemont Drive, Houston, Texas 77092 (SUNNYSIDE #2), and was opened in or around April 2019.

16. CORNERSTONE Rx PHARMACY, INC. (“CORNERSTONE”) was a retail pharmacy located at 7255 Bissonnet Street, in Houston, Texas 77074. CORNERSTONE became registered with the DEA, and was licensed with the TSBP, since approximately 2009. CORNERSTONE was authorized to dispense Schedule II through V controlled substances.

17. **JONATHAN ROSENFELD, M.D. (1)** (“ROSENFELD”), a resident of Fulton County, Georgia, was a Medical Doctor, and was licensed to practice medicine in the State of Texas since in or around December 2017. According to Texas Secretary of State Records, **ROSENFELD** formed SUNNYSIDE WELLNESS in or around October 4, 2018, and was its President. Along with his business partners, **ROSENFELD** owned or controlled SUNNYSIDE WELLNESS, and was the Medical Director for SUNNYSIDE #1 and #2 where he prescribed large volumes of controlled substances—primarily oxycodone 30mg, hydrocodone 10/325mg, and carisoprodol 350mg.

18. Doctor A was a Medical Doctor licensed to practice medicine in the State of Texas. Doctor A purported to treat patients for pain at SUNNYSIDE #2, where he purportedly prescribed large volumes of controlled substances—primarily oxycodone 30mg and hydrocodone 10/325mg.

19. Elmer Taylor (“Taylor”), a resident of Fort Bend County, Texas, owned or controlled SUNNYSIDE #1 and #2, along with **ROSENFELD** and Alantha Stewart. Taylor also recruited patient-runners and purported patients to buy controlled substances for illegitimate prescriptions issued by **ROSENFELD** and Doctor A.

20. Alantha Stewart (“Stewart”), a resident of Fort Bend County, Texas, owned or controlled SUNNYSIDE #1 and #2, along with **ROSENFELD** and her husband, Taylor.

According to Texas Secretary of State Records, Stewart formed SUNNY SIDE WELLNESS CENTER, LLC on May 17, 2018.

21. Kwana Broussard (“Broussard”), a resident of Fort Bend County, Texas, was a crew leader who coordinated with clinic owners, pharmacists, other crew leaders, runners, and others, to pay purported patients to obtain illegitimate prescriptions from clinics, and to fill those prescriptions at pharmacies. Broussard also paid the clinics, including SUNNYSIDE #1 and #2 to issue the prescriptions, and the pharmacies, including CORNERSTONE, to fill the prescriptions. The prescriptions were often for oxycodone, hydrocodone, or carisoprodol.

22. Ricky Wayne Moten (“Moten”), a resident of Harris County, Texas, was the head of a drug trafficking organization in Houston, Texas. Moten coordinated with Taylor, Broussard, and other Houston-area clinics, pharmacies, crew leaders, and runners, the purchase and illegal diversion of illegitimate prescriptions issued by Houston-area doctors, including **ROSENFELD** and Doctor A, and filled at Houston-area pharmacies, including CORNERSTONE.

23. **SOKARI MANUEL BOBMANUEL, R.P.H. (6)** (“**BOBMANUEL**”), often known as “Momma,” a resident of Fort Bend County, Texas, was the owner and Pharmacist in Charge (“PIC”) at CORNERSTONE. **BOBMANUEL** dispensed thousands of prescriptions for controlled substances, and often charged exorbitant prices for the combination of oxycodone or hydrocodone and carisoprodol.

24. Ardella Fisher, F.N.P. (“Fisher”), a resident of Fort Bend County, Texas, was a Family Nurse Practitioner licensed to practice in the State of Texas since November 2017, and was



a registered nurse for several years before that. Beginning in or around June 2018, Fisher worked at SUNNYSIDE #1, where **ROSENFELD** acted as her supervising physician.

25. **ENNA AMEDOME, F.N.P. (8)** (“**AMEDOME**”), a resident of Fort Bend County, Texas, was a Family Nurse Practitioner licensed to practice in the State of Texas since in or around November 2017. Beginning in or around April 2019, **AMEDOME** worked at SUNNYSIDE #2, where **DOCTOR A** acted as her supervising physician.

26. Otukayode Adeleke Otufale (“**Otufale**”), a resident of Fort Bend County, Texas, worked for **BOBMANUEL** at CORNERSTONE. Otufale was at one time a pharmacist, but TSBP revoked his license in or around August 2007. Nevertheless, Otufale assisted **BOBMANUEL** in dispensing thousands of prescriptions for controlled substances at CORNERSTONE.

27. Jasmine Maynes (“**Maynes**”), a resident of Galveston County, Texas, was a Houston-area “crew-leader” who coordinated with clinics and pharmacies the purchase and illegal diversion of illegitimate prescriptions, many of which were written by **ROSENFELD** and Doctor A and filled at CORNERSTONE.

28. Jabrai Price (“**Price**”), a resident of Brazos County, Texas, was a Houston-area “crew leader” who coordinated with clinics and pharmacies the purchase and illegal diversion of illegitimate prescriptions, many of which were written by **ROSENFELD** and Doctor A and filled at CORNERSTONE.

29. **SHAWNEECE DEYAMPERT (12)** (“**DEYAMPERT**”), a resident of Harris County, Texas, worked at SUNNYSIDE #1, where she was referred to as the “money person.” **DEYAMPERT** was the niece of Taylor.

**COUNT 1**  
**Conspiracy to Unlawfully Distribute and Dispense Controlled Substances**  
**(21 U.S.C. § 846)**

30. Paragraphs 1 through 29 of this Superseding Indictment are re-alleged and incorporated by reference as if fully set forth herein.

31. From in or around May 2018, and continuing through in or around August 2019, the exact dates being unknown to the Grand Jury, in the Houston Division of the Southern District of Texas and elsewhere, Defendants

**JONATHAN ROSENFELD, M.D.,**  
**SOKARI MANUEL BOBMANUEL,**  
**ENNA AMEDOME,**  
and  
**SHAWNEECE DEYAMPERT**

knowingly and intentionally combined, conspired, confederated, and agreed together and with each other, and with others known and unknown to the Grand Jury, including Taylor, Stewart, Broussard, Moten, Fisher, Otufale, Maynes, and Price, to violate Title 21, United States Code, Section 841(a)(1), that is, to knowingly and intentionally unlawfully distribute and dispense, mixtures and substances containing a detectable amount of controlled substances, including oxycodone and hydrocodone, both Schedule II controlled substances, and other controlled substances, outside the usual course of professional practice and not for a legitimate medical purpose.

All in violation of Title 21, United States Code, Section 846.

**Purpose of the Conspiracy**

32. It was a purpose and object of the conspiracy for the Defendants, and others known and unknown to the Grand Jury, to unlawfully enrich themselves by, among other things: (a) distributing and dispensing controlled substances outside the usual course of professional practice and not for a legitimate medical purpose; (b) generating large profits from distributing and dispensing those controlled substances; and (c) diverting the proceeds from distributing and dispensing those controlled substances for their personal use and benefit.

**Manner and Means of the Conspiracy**

The manner and means by which the Defendants sought to accomplish the purpose and object of the conspiracy included, among other things:

33. **ROSENFELD** used his status as a licensed physician, his DEA Registration Number, his purported supervision of Fisher, and his medical practices SUNNYSIDE #1 and #2 to knowingly prescribe controlled substances, including oxycodone, hydrocodone, and carisoprodol, outside the usual course of professional practice and not for a legitimate medical purpose.

34. **ROSENFELD**'s prescribing habits demonstrated a gross lack of individualized care for his purported patients: the vast majority of **ROSENFELD**'s prescriptions were for oxycodone 30mg, hydrocodone 10/325mg, and carisoprodol 350mg, the highest dosage strengths of hydrocodone and carisoprodol, and the highest short-acting dosage strength of oxycodone, and were for same or substantially similar dosage units (pills)—105 to 120 pills of oxycodone or hydrocodone, and 90 pills of carisoprodol. This highly addictive and dangerous combination of oxycodone and carisoprodol or hydrocodone and carisoprodol, two components of the highly diverted "Houston cocktail," was prescribed outside the usual course of professional practice and with no legitimate medical purpose.

35. Doctor A used his status as a licensed physician, his DEA Registration Number, his purported supervision of **AMEDOME**, and **SUNNYSIDE #2** to prescribe controlled substances, including oxycodone and hydrocodone, outside the usual course of professional practice and not for a legitimate medical purpose.

36. Doctor A's prescribing habits also demonstrated a gross lack of individualized care for his purported patients: the vast majority of Doctor A's prescriptions were for oxycodone 30mg, and hydrocodone 10/325mg, the most potent dosage strengths of these drugs, and were for the same or substantially similar dosage units—105 to 120 pills of oxycodone or hydrocodone.

37. Taylor, Stewart, and **DAYEMP**, obtained purported patients—customers—from crew leaders, runners, and others, including Broussard, Price, Maynes, and Moten to visit **SUNNYSIDE #1** and **#2**. Broussard, Price, Maynes, and Moten often paid these individuals to pose as patients in exchange for obtaining prescriptions for controlled substances at Houston-area clinics, including **SUNNYSIDE #1** and **#2**.

38. Taylor, Stewart, **DEYAMP**, and other employees of the **SUNNYSIDE WELLNESS** accepted cash only—ranging from \$250 to \$300 for hydrocodone, and \$500 for oxycodone—from crew leader and runners, in exchange for illegal prescriptions for oxycodone, hydrocodone, carisoprodol, and other drugs that **ROSENFELD** and Doctor A purportedly prescribed to individuals posing as patients at **SUNNYSIDE #1** and **#2**.

39. Fisher and **AMEDOME** used their status as licensed Family Nurse Practitioners and their DEA Registration Numbers to make it appear as if **SUNNYSIDE #1** and **#2** were operating legitimately by purporting to see and treat patients at those locations. In reality, **ROSENFELD** and Doctor A were often absent from **SUNNYSIDE WELLNESS**—and **ROSENFELD** was often out of state—and Fisher and **AMEDOME** conducted only perfunctory

examinations that almost always resulted in a prescription purportedly from **ROSENFELD** or Doctor A for dangerous and highly addictive controlled substances, including oxycodone, hydrocodone, or carisoprodol.

40. **ROSENFELD**, Doctor A, Fisher, and **AMEDOME** often ignored obvious signs of addiction and drug-diversion, and nevertheless approved prescriptions for controlled substances.

41. At times when **ROSENFELD** was absent or out of state, and with **ROSENFELD**'s consent and approval, Stewart and Taylor also issued electronic prescriptions for controlled substances to individuals, knowing those individuals had received no medical examination whatsoever, and therefore the prescriptions were issued with no legitimate medical purpose and outside the usual course of professional practice.

42. After a paper or electronic prescription was purportedly issued by **ROSENFELD** or Doctor A at SUNNYSIDE #1 or #2, crew leaders and runners, including Broussard, Price, Maynes, and Moten, filled or had the individuals posing as patients fill those prescriptions at Houston-area pharmacies, including CORNERSTONE.

43. **BOBMANUEL** used her status as a licensed pharmacist, her DEA Registration Number, and her pharmacy CORNERSTONE, to knowingly dispense controlled substances, including oxycodone, hydrocodone, and carisoprodol, outside the usual course of professional practice and not for a legitimate medical purpose.

44. **BOBMANUEL**, in coordination with Otufale, knowingly filled illegitimate prescriptions for oxycodone, hydrocodone, and carisoprodol, in exchange for cash for illegitimate patients that crew leaders and runners, including Broussard, Taylor, and others, trafficked to

CORNERSTONE. **BOBMANUEL** often charged over approximately \$1,200 to fill just one of those prescriptions, well over market value for legitimate prescriptions.

45. The prescriptions **BOBMANUEL** filled at CORNERSTONE were almost always for oxycodone 30mg, hydrocodone 10/325mg, and carisoprodol 350mg—the highest dosage strengths of hydrocodone and carisoprodol, and the highest short-acting dosage strength of oxycodone. Though **BOBMANUEL** almost always ordered these high-strength controlled substances from multiple drug distributors, CORNERSTONE's stock was often low due to the high demand for these controlled substances.

46. **BOBMANUEL** and Otufale's management, operation, and filling prescriptions at CORNERSTONE exhibited many, if not all, of the pill-mill red flags warned against by TSBP.

47. Broussard, Price, Maynes, Moten, and others diverted and sold on the black market the illegally obtained controlled substances that were purportedly prescribed by **ROSENFELD**, Doctor A, and other physicians, and that were dispensed by **BOBMANUEL** at CORNERSTONE and by other pharmacies.

48. From in or around January 2018, and continuing through in or around August 2019, **ROSENFELD** issued prescriptions for almost 1.9 million controlled substance pills: approximately 752,000 pills of oxycodone 30mg, approximately 419,000 pills of hydrocodone 10/325mg, and approximately 562,000 pills of carisoprodol 350mg.

49. In less than a three-month period, from in or around April 2019, and continuing through in or around August 2019, while Doctor A was the supervising physician over **AMEDOME** at SUNNYSIDE #2, Doctor A purportedly issued prescriptions for approximately 283,000 controlled substance pills—approximately 243,000 pills of oxycodone 30mg and approximately 35,000 pills of hydrocodone 10/325mg.

50. From in or around October 2016, and continuing through in or around August 2019, CORNERSTONE dispensed approximately 376,000 controlled substance pills—approximately 109,000 pills of oxycodone 30mg, 120,000 pills of hydrocodone 10/325mg, and 125,000 pills of carisoprodol 350mg.

All in violation of Title 21, United States Code, Section 846.

**COUNTS 2-4**  
**Unlawfully Distributing and Dispensing Controlled Substances and Aiding and Abetting**  
**(21 U.S.C. § 841 and 18 U.S.C. § 2)**

51. Paragraphs 1 through 29 and 33 through 50 of this Superseding Indictment are re-alleged and incorporated by reference as if fully set forth herein.

52. On or about the dates specified below, in the Houston Division of the Southern District of Texas, the Defendants specified below, aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally unlawfully distribute and dispense, outside the usual course of professional practice and not for a legitimate medical purpose, the controlled substances alleged below:

<b>Count</b>	<b>Defendant(s)</b>	<b>Controlled Substance</b>	<b>On Or About Date</b>	<b>“Patient” Initials</b>
2	<b>JONATHAN ROSENFELD, M.D.</b>	Hydrocodone 10/325mg	05/16/19	CI#3
3	<b>ENNA AMEDOME, F.N.P.</b>	Oxycodone 30mg	06/26/19	CI#3
4	<b>ENNA AMEDOME, F.N.P.</b>	Hydrocodone 10/325mg	06/26/19	CI#4

Each in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT 5**

**Maintaining a Drug-Involved Premises and Aiding and Abetting  
(21 U.S.C. § 856(a)(1) and 18 U.S.C. § 2))**

53. Paragraphs 1 through 29 and 33 through 50 of this Superseding Indictment are re-alleged and incorporated by reference as if fully set forth herein.

54. From in or around October 2016, and continuing through in or around August 2019, the exact dates being unknown to the Grand Jury, in the Houston Division of the Southern District of Texas and elsewhere, Defendant

**SOKARI MANUEL BOBMANUEL, R.P.H.,**

aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, including Otufale, did unlawfully and knowingly use and maintain a place known as CORNERSTONE, located at 7255 Bissonnet Street, in Houston, Texas 77074, for the purpose of distributing Schedule II controlled substances, including oxycodone and hydrocodone, outside the usual course of professional practice and without a legitimate medical purpose.

In violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

**COUNT 6**

**Maintaining a Drug-Involved Premises and Aiding and Abetting  
(21 U.S.C. § 856(a)(1) and 18 U.S.C. § 2))**

55. Paragraphs 1 through 29 and 33 through 50 of this Superseding Indictment are re-alleged and incorporated by reference as if fully set forth herein.

56. From in or around May 2018, and continuing through in or around August 2019, the exact dates being unknown to the Grand Jury, in the Houston Division of the Southern District of Texas and elsewhere, Defendant

**JONATHAN ROSENFELD, M.D.,**



aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, including Taylor and Stewart, did unlawfully and knowingly use and maintain a place known as Sunnyside Medical, PLLC, doing business as Sunnyside Wellness, located at 4561 Edfield Street, Houston, Texas 77051, for the purpose of distributing Schedule II controlled substances, including oxycodone and hydrocodone, and other controlled substances, outside the usual course of professional practice and without a legitimate medical purpose.

In violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

**NOTICE OF CRIMINAL FORFEITURE**  
**(21 U.S.C. § 853(a))**

57. Pursuant to Title 21, United States Code, Section 853(a), the United States of America gives notice to Defendants that upon conviction of an offense in violation of Title 21, United States Code, Sections 841, 846, or 856 the following is subject to forfeiture:

- a. all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- b. all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

**Money Judgment and Substitute Assets**

58. The United States will seek the imposition of a money judgment against each Defendant upon conviction.

59. Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the Defendants up to the amount of the money judgment against that Defendant.

## Original Signature on File

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY

GLENN S. LEON  
CHIEF, FRAUD SECTION  
CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE

*Emily E. Petro*

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EMILY E. PETRO  
TRIAL ATTORNEY  
FRAUD SECTION, CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE