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RECEIVED  
 SEP 25 2018  
 FILING FILED  
 Superior Court of California  
 County of Los Angeles

OCT 01 2018

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 Reyna Navarro

Attorneys for Plaintiff

NO FEE - GOV'T CODE §6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA,  
 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA, )

Case No.: BC704942

Plaintiff,

**STIPULATED  
 JUDGMENT AND PERMANENT  
 INJUNCTION AGAINST FLAVIA MARIA  
 RODRIGUEZ AND SALVADOR  
 ENRIQUE VELASCO SANCHEZ**

vs.

FLAVIA MARIA RODRIGUEZ, an individual, aka  
 Flavia Rodriguez; SALVADOR ENRIQUE  
 VELASCO SANCHEZ, an individual, aka Enrique  
 Velasco; and DOES 1 through 50, inclusive

[Unlimited Action]

Defendants.

Honorable Michael P. Linfield  
 Department 34  
 Filed May 3, 2018

PLAINTIFF, the People of the State of California, and DEFENDANTS Flavia Maria  
 Rodriguez ("RODRIGUEZ") and Salvador Enrique Velasco Sanchez ("VELASCO")  
 (collectively "DEFENDANTS") stipulate to the following findings, judgment and permanent  
 injunction, as follows:

**I. FINDINGS**

1. Plaintiff filed its lawsuit ("Action") on May 3, 2018, alleging DEFENDANTS  
 illegally imported, possessed for sale and sold at least 935 illegal, dangerous, misbranded, and  
 counterfeit pharmaceuticals from their home at 1802 W. 51<sup>st</sup> Street, Los Angeles, CA. Plaintiff

1 and DEFENDANTS stipulate that this Court has jurisdiction over the subject matter of the case  
2 and over the DEFENDANTS.

3 2. A multi-agency investigation of nearly four (4) years determined that  
4 DEFENDANTS illegally imported dangerous, illegal, misbranded and counterfeit  
5 pharmaceuticals from El Salvador and Mexico. Defendant VELASCO repeatedly traveled to El  
6 Salvador to purchase and ship illegal pharmaceuticals back to Defendant RODRIGUEZ.  
7 DEFENDANTS distributed the drugs throughout the U.S. to cities including Los Angeles,  
8 Atlanta, Bakersfield, Houston, Reno, San Francisco and Compton. DEFENDANTS also  
9 actively recruited others to sell the illegal, dangerous, misbranded and counterfeit  
10 pharmaceuticals for them. All of the above are violations of section 17200 of the Business and  
11 Professions Code.

12 3. The dangerous, illegal, misbranded and counterfeit pharmaceuticals are  
13 prohibited for sale in the United States and included injectable anti-inflammatories and  
14 powerful antibiotics, the over-use of which can contribute to antibiotic resistance, a significant  
15 and increasingly dangerous public health threat. Defendant RODRIGUEZ repeatedly advised  
16 others on which medicines to take, provided pharmaceuticals without asking for, or receiving a  
17 prescription, and admitted to injecting others with the illegal pharmaceuticals. Neither  
18 Defendant is a licensed medical provider.

19 4. DEFENDANTS sold various combinations of dangerous, illegal, misbranded and  
20 counterfeit pharmaceuticals to investigators on at least 14 separate occasions. RODRIGUEZ  
21 also sold pharmaceuticals from a storefront location in the City of Los Angeles, which is the  
22 subject of a separate civil law suit filed by Plaintiff on the same day as this ACTION<sup>1</sup>.

23 5. In May of 2018, law enforcement agents in Los Angeles, Orange County, San  
24 Diego, and Arizona served multiple warrants relating to the sale of illegal, misbranded and  
25 counterfeit pharmaceuticals. On May 3, 2018, law enforcement served a search warrant at

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<sup>1</sup> People v. Cesar E. Acosta et al. BC704941 filed 5/3/18 by Plaintiff alleges the sale of illegal, misbranded and counterfeit pharmaceuticals by employees at a storefront business at 2824 S. Vermont, which is not a pharmacy. The sellers were not medical providers. Flavia Rodriguez was one of the sellers. That investigation led to a third location at 4160 Vermont, which also sold similar illegal, misbranded and counterfeit pharmaceuticals. 4160 S. Vermont is also a subject of People v. Acosta.

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1 DEFENDANTS' home and recovered an additional 42,605 illegal, misbranded and counterfeit  
2 pharmaceuticals, of which 75 were counterfeit Diprosan and 600 were counterfeit Sildenafil  
3 tablets. These numbers are over and above the 935 pharmaceuticals alleged in Plaintiff's  
4 Complaint.

5 6. Plaintiff and DEFENDANTS ("Parties") now wish to resolve the Action without  
6 further litigation by entering into this stipulated final judgment and permanent injunction  
7 ("Judgment"). This stipulation is not a settlement under Civil Code section 664.6 and the  
8 Parties do not request dismissal of the Action.

9 7. Once executed by the Parties, this Judgment may be signed by any judge of the  
10 Superior Court of the State of California, County of Los Angeles and entered by the Clerk  
11 without further notice or motion.

12 8. Plaintiff is the prevailing party in this matter and DEFENDANTS waive all rights to  
13 seek appellate review or otherwise challenge the validity of the judgment. DEFENDANTS  
14 further waive and release any claim against Plaintiff, its employees, representatives, or agents  
15 arising out of the commencement or conduct of this Action.

16 THEREFORE, the Court **ORDERS, ADJUDGES AND DECREES** that:

17 1. DEFENDANTS and their agents, successors, officers, employees, servants and  
18 any persons or entities who work in concert with them, are declared in violation of Business  
19 and Professions Code section 17200, et seq.

20 Permanent Injunction

21 2. Under Business and Professions Code § 17203 and the equitable powers of this  
22 Court, DEFENDANTS, their assigns and all persons or entities who act in concert with them or  
23 on their behalf or their successors be ordered and directed to take such actions as may be  
24 necessary to prevent the unlawful business acts and practices described in this Complaint  
25 from recurring.

26 3. That under Business and Professions Code §17203 and the equitable  
27 powers of this Court, a permanent injunction be issued against DEFENDANTS, and Does 1  
28 through 50, and each of them, including but not limited to, as follows:

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I. Do not import or possess misbranded medication.

J. Do not offer to treat or diagnose patients. Do not recommend medication or treatments to others, regardless of whether a prescription is required by law.

K. Do not provide injections. Do not offer to provide injections.

L. Cooperate with law enforcement and allow the warrantless search and seizure of your home by law enforcement between 8 am and 6 pm for five (5) years from the date this order is signed by the Court. Home includes DEFENDANTS' current home and any future residences where DEFENDANTS live in the State of California, whether or not the home is owned by DEFENDANTS.

M. Cooperate with law enforcement and allow the warrantless search and seizure of any vehicle you own and/or operate for five (5) years from the date this order is signed by the Court.

N. Notify Plaintiff in writing, via certified mail, within 48 hours of offering your home for sale, or entering into any contract to sell your home, whichever is sooner. This applies only to homes in California.

O. Each Defendant shall notify Plaintiff in writing within 10 days of moving and/or selling their home and shall provide Plaintiff with their new address. Notification shall be sent to Kevin Gilligan or his successor via certified mail and sent to the address on the first page of this document.

Website & Internet Sales

P. Do not engage in any internet sales or advertising related to pharmaceuticals, herbal remedies, or over the counter medicines, whether individually or through any corporation, partnership or other business, regardless of the name, corporate structure or location.

4. DEFENDANTS shall pay a total of \$50,000 in civil penalties, costs and restitution as detailed herein.

Costs/Restitution

A. DEFENDANTS shall pay investigative costs of \$ 5,000 by cashier's check

1 made out to the Los Angeles County DHS-HALT (Department of Health Services  
2 - Health Authority Law Enforcement Task Force), due at the time of signing.

3 B. DEFENDANTS shall pay restitution of \$5,000 by cashier's check made out  
4 to the victim 'Merck & Co. Inc.' which is due at the time of signing.

5 Civil Penalties.

6 C. DEFENDANTS shall pay the remaining \$40,000 in civil penalties within  
7 four years of the date of the signing of this order described below. Defendants  
8 may pay the entire sum due at any time with no pre-payment penalty.

9 1. \$10,000 is due on January 7, 2019, via two cashier's checks; the first  
10 cashier's check for \$5,000 shall be made payable to the "City of Los Angeles"  
11 and the second cashier's check for \$5,000 shall be made payable to the "County  
12 of Los Angeles."

13 2. \$3,750 is due on March 1<sup>st</sup>, 2019.

14 3. \$3,750 is due on October 1<sup>st</sup>, 2019.

15 4. \$3,750 is due on March 1, 2020.

16 5. \$3,750 is due on October 1, 2020

17 6. \$3,750 is due on March 1, 2021

18 7. \$3,750 is due on October 1, 2021.

19 8. \$3,750 is due on March 1, 2022.

20 9. \$3,750 is due on October 1, 2022.

21 Each of the \$3,750 payments is to be paid by two (2) certified checks or bank  
22 checks with \$1,875 due to the "City of Los Angeles" and \$1,875 due to the  
23 "County of Los Angeles" as required by California Business and Professions  
24 Code section 17206(c).

25 5. DEFENDANTS shall pay the amount of filing fees and the amount of the fee for  
26 the service of process or notices which would have been paid but for Government Code  
27 section 6103.5, in the amount of \$455 with a cashier's check made out to the Clerk of the  
28 Superior Court of Los Angeles, due at the time of signing.

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2 Notice/Payments

3 6. All payments and notices shall be delivered personally or by certified mail to  
4 Kevin Gilligan or his successor at the address of on the top of page 1 of this document.

5 7. That Plaintiff be granted such other and further relief as the Court deems just and  
6 proper.

7 DATED: 09-19-18, 2018

8 By: [Signature]  
FLAVIA MARIA RODRIGUEZ

9  
10 DATED: 09-19-2018, 2018

11 By: [Signature]  
SALVADOR ENRIQUE VELASCO SANCHEZ

12 DATED: Sept. 19., 2018

13 By: Ameer Shah  
AMEER SHAH, Attorney for Defendants  
14 Signed as to form only

15 DATED: 9-24-18, 2018

16 By: [Signature]  
KEVIN A. GILLIGAN, Supervising City Attorney  
17 Attorneys for Plaintiff, THE PEOPLE OF THE  
18 STATE OF CALIFORNIA

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21 IT IS SO ORDERED:

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23 DATED: OCT 01 2018

24 By: [Signature]  
Judge of the Superior Court of Los Angeles  
25 MICHAEL LINFIELD

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I certify that this is a true and correct copy of the original on file in this office consisting of 7 pages

SHERRI R. CARTER, Executive Officer / Clerk of the Superior Court of California, County of Los Angeles

~~OCT 10 2010~~  Deputy

MANUEL GINES