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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

HEMATOLOGY ONCOLOGY  
CONSULTANTS, a California  
General Partnership,  
MARK GOLDSTEIN, and  
STANLEY ROSSMAN,  
  
Defendants.

CR No. 2:21-cr-00026 -SVW

I N F O R M A T I O N

[18 U.S.C. § 545: Receiving  
Prescription Drugs Imported  
Contrary to Law; 21 U.S.C.  
§§ 331(c) and 333(a)(1): Receipt  
of Misbranded Drugs in Interstate  
Commerce and Proffered Delivery  
Thereof For Pay; 18 U.S.C. §§ 545  
and 982 and 28 U.S.C. § 2461(c):  
Criminal Forfeiture]

The Acting United States Attorney charges:

COUNT ONE

[18 U.S.C. § 545]

[Defendant HEMATOLOGY ONCOLOGY CONSULTANTS]

On or about June 2008 through on or about October 20, 2011, in  
Los Angeles County, within the Central District of California, and  
elsewhere, defendant HEMATOLOGY ONCOLOGY CONSULTANTS, a California  
General Partnership, knowingly received and bought merchandise,  
namely, misbranded and unapproved new drugs, after their importation,  
knowing the merchandise to have been imported or brought into the

1 United States contrary to law. Specifically, defendant HEMATOLOGY  
2 ONCOLOGY CONSULTANTS received and bought misbranded and unapproved  
3 new drugs, namely Altuzan, knowing that such merchandise had been  
4 imported into the United States without being listed for commercial  
5 distribution, as required by Title 21, United States Code, Section  
6 352(o), in violation of Title 21, United States Code, Section 331(a),  
7 and without being approved by the United States Food and Drug  
8 Administration, as required by Title 21, United States Code, Section  
9 355(a), in violation of Title 21, United States Code, Section 331(d).

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COUNT TWO

[21 U.S.C. §§ 331(c), 333(a)(1)]

[Defendants GOLDSTEIN and ROSSMAN]

From on or about June 2008 through on or about October 20, 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendants MARK GOLDSTEIN and STANLEY ROSSMAN received in interstate commerce, and caused the receipt in interstate commerce, of misbranded drugs, namely, misbranded and unapproved Altuzan, and delivered and proffered the delivery thereof for pay, and caused the delivery and caused the proffered delivery thereof for pay.

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FORFEITURE ALLEGATION ONE

[18 U.S.C. §§ 982(a)(2)(B) and 545]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Sections 982(a)(2)(B) and 545, and Title 28,  
7 United States Code, Section 2461(c), in the event of any of the  
8 defendant's conviction of the offense set forth in Count One of this  
9 Information.

10 2. Any defendant so convicted shall forfeit to the United  
11 States the following:

12 (a) All right, title, and interest in any and all property,  
13 real or personal, constituting, or derived from, any proceeds  
14 obtained, directly or indirectly, as a result of such offense;

15 (b) Any and all merchandise introduced into the United  
16 States in violation of Title 18, United States Code, Section 545, or  
17 the value thereof; and

18 (c) To the extent such property is not available for  
19 forfeiture, a sum of money equal to the total value of the property  
20 described in subparagraphs (a) and (b).

21 3. Pursuant to Title 21, United States Code, Section 853(p),  
22 as incorporated by Title 18, United States Code, Section 982(b) and  
23 Title 28, United States Code, Section 2461(c), any defendant so  
24 convicted shall forfeit substitute property, up to the total value of  
25 the property described in the preceding paragraph if, as the result  
26 of any act or omission of said defendant, the property described in  
27 the preceding paragraph, or any portion thereof: (a) cannot be  
28 located upon the exercise of due diligence; (b) has been transferred,

1 sold to or deposited with a third party; (c) has been placed beyond  
2 the jurisdiction of the Court; (d) has been substantially diminished  
3 in value; or (e) has been commingled with other property that cannot  
4 be divided without difficulty.

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FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982(a)(7) and 28 U.S.C. § 2461(c)]

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3 1. Pursuant to Rule 32.2(a), Fed. R. Crim. P., notice is  
4 hereby given that the United States will seek forfeiture as part of  
5 any sentence, pursuant to Title 18, United States Code, Section  
6 982(a)(7) and Title 28, United States Code, Section 2461(c), in the  
7 event of any defendant's conviction of the offense set forth in Count  
8 Two of this Information.

9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 (a) All right, title, and interest in any and all  
12 property, real or personal, that constitutes or is derived, directly  
13 or indirectly, from the gross proceeds traceable to the commission of  
14 the offense of conviction; and

15 (b) To the extent such property is not available for  
16 forfeiture, a sum of money equal to the total value of the property  
17 described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section 853(p),  
19 as incorporated by Title 28, United States Code, Section 2461(c), and  
20 Title 18, United States Code, Section 982(b), any defendant so  
21 convicted shall forfeit substitute property, up to the total value of  
22 the property described in the preceding paragraph if, as a result of  
23 any act or omission of said defendant, the property described in the  
24 preceding paragraph, or any portion thereof (a) cannot be located  
25 upon the exercise of due diligence; (b) has been transferred, sold to  
26 or deposited with a third party; (c) has been placed beyond the  
27 jurisdiction of the Court; (d) has been substantially diminished in  
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1 value; or (e) has been commingled with other property that cannot be  
2 divided without difficulty.

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4 TRACY L. WILKISON  
Acting United States Attorney

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7 BRANDON D. FOX  
Assistant United States Attorney  
Chief, Criminal Division

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9 JOSEPH O. JOHNS  
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Chief, Environmental and Community  
10 Safety Crimes Section

11 SONIA W. NATH  
Special Assistant United States  
12 Attorney