

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
V.)	
)	Docket No. 20-CR-40021-MRG
RAHIM SHAFI, et al.)	
)	
Defendant)	

GOVERNMENT'S FIRST EXHIBIT LIST

The United States of America hereby notifies the defendant that it may introduce the following exhibits in its case-in-chief. The government reserves its right to supplement this list, and to introduce any exhibits needed for cross-examination, impeachment, and/or rebuttal.

Exhibit Number	Description
1	April 2013 Shipment
1.1	April 2013 Fedex Shipping Docs
1.2	April 2013 Credit Card Statements
1.3	April 2013 Email Comms
1.4	April 2013 Invoice
2	April 2014 Shipment
2.1	April 2014 DHL Shipping Docs
2.2	April 2014 Credit Card Statements
2.3	April 2014 Email Comms
2.4	April 2014 Invoice
3	June 2016 Shipment
3.1	June 2016 DHL Shipping Docs
3.2	June 2016 Credit Card Statement
3.3	June 2016 Email Comms
3.4	June 2016 Email Comms
3.5	June 2016 Invoice
4	November 2017 Shipment
4.1	November 2017 DHL Shipping Docs
4.2	November 2017 Credit Card Statement
4.3	November 2017 Email Comms
4.4	November 2017 Invoice

5	January 2018 Shipment
5.1	January 2018 DHL Shipping Docs
5.2	January 2018 Credit Card Statement
5.3	January 2018 Email Comms
5.4	January 2018 Invoice
6	August 2017 Export
6.1	August 2017 DHL Shipping Docs
6.2	August 2017 Emails
7	J.R. -- 10.30.12 Implant
7.1	Implant Packaging/Label
7.2	Receipt for Payment
7.3	Medical Record
8	I.A. -- 02.01.13 Implant
8.1	Implant Packaging/Label
8.2	Receipt for Payment
8.3	Medical Record
8.4	Pre-Surgery Paperwork
9	BR -- 08.30.13 Implant
9.1	Receipt for Payment
9.2	Medical Record
9.3	Pre-Surgery Paperwork
10	MM -- 06.25.14 Implant
10.1	Implant Packaging/Label
10.2	Receipt for Payment
10.3	Medical Record
10.4	Pre-Surgery Paperwork
11	D.I. -- Patient File
11.1	Photo of Implant Site
11.2	Photo of Implant Site
12	M.M. -- 06.17.15 Implant
12.1	Implant Packaging/Label
12.2	Receipt for Payment
12.3	Medical Record
12.4	Pre-Surgery Paperwork
13	RB -- June 20, 2015 Payment Agreement
14	RB -- June 20, 2015 Consent Form
15	S.M. -- 06.17.16 Implant
15.2	Receipt for Payment
15.4	Pre-Surgery Paperwork
17	W.C. - 7.11.17 Implant
17.1	Implant Packaging/Label

17.2	Receipt for Payment
17.3	Medical Record
17.4	Pre-Surgery Paperwork
18	RB – 12.14.17 Implant
18.1	Implant Packaging/Label
18.2	Receipt for Payment
18.3	Medical Record
18.4	Pre-Surgery Paperwork
19	JP – 07.07.18 Implant
19.1	Implant Packaging/Label
19.2	Receipt for Payment
19.3	Medical Record
19.4	Pre-Surgery Paperwork
20	K.P. -- 10.20.18 Implant
20.1	Implant Packaging/Label
20.2	Receipt for Payment
20.3	Medical Record
20.4	Pre-Surgery Paperwork
21	J.S. -- 1.31.19 Implant
21.1	Implant Packaging/Label
21.2	Receipt for Payment
21.3	Medical Record
21.4	Pre-Surgery Paperwork
22	C.R. -- Patient File
23	K.T. -- Patient File
23.1	Letter from Victory Programs (7.10.2017)
23.2	Milford Regional Med Center Records
24	Marraffa & Associates Contract
25	June 2019 Recorded Interview of Shafa
26	Moran Recording Shafa.mp3
27	October 2018 UC Visit Video 5
28	October 2018 UC Visit Video 6
29	October 2018 UC Visit Video 7
30	October 2018 UC Visit Video 8
31	October 2018 UC Visit Video 9
32	October 2018 UC Visit Video 10
33	October 2018 UC Visit Video 11
34	October 2018 UC Visit Video 12
35	October 2018 UC Visit Video 13
36	October 2018 UC Visit Video 14
37	Transcript - Call between Shafa and Moran

38	Transcript - 03.29.19 Call
39	Transcript - October 2018 UC Visit
40	Transcript - April 2019 UC Visit
41	Cambridge Savings Bank Records
41.1	Cambridge Savings Bank Records for Account ending - 0857; held by Nahid Tormosi and Rahim Shafa
41.2	Cambridge Savings Bank Records for Account ending - 0592; held by Nahid Tormosi and Rahim Shafa
41.3	Cambridge Savings Bank Records for Account ending - 0600; held by Nahid Tormosi and Rahim Shafa
41.4	Cambridge Savings Bank Records for Account ending - 2800; held by Nahid Tormosi
41.5	Cambridge Savings Bank Records for Account ending - 4782; held by Nahid Tormosi and Rahim Shafa
41.6	Cambridge Savings Bank Records for Account ending - 4912; held by Nahid Tormosi d/b/a Metro and Greater Boston CNS
41.7	Cambridge Savings Bank Records for Account ending - 3209; held by Nahid Tormosi d/b/a Novel Psychopharmacy Care
42	Bank of America Records for Mastercard ending -4939; held by Nahid Tormosi and Rahim Shafa
43	CitiBank Records for Visa credit card ending -8756; held by Nahid Tormosi
44	Customs Border Crossings
45	American Airlines Records
46	United Airlines Records
47	Explanation of Airport Codes
48	Medicare Claims Data
51	SHAFAs Schedules - 7/2016 - 12/2016
52	SHAFAs Schedules - 1/2017 - 6/2017
53	SHAFAs Schedules - 7/2017 - 12/2017
54	SHAFAs Schedules - 1/2018 - 6/2018
55	SHAFAs Schedules - 7/2018 - 12/2018
56	GARLAND Summary Chart I
57	GARLAND Summary Chart II
58	GARLAND Summary Chart III
59	GARLAND Summary Chart IV
60	QUINDOZA Summary Chart I
61	QUINDOZA Summary Chart II
62	QUINDOZA Summary Chart III
63	QUINDOZA Summary Chart IV
64	Rahim Shafa Medicare Enrollment Application

65	Rahim Shafa MD PC Medicare Enrollment Application
66	Rahim Shafa – Medicare Provider Enrollment, Chain, and Ownership System Report
67	Rahim Shafa, MD PC – Medicare Provider Enrollment, Chain, and Ownership System Report
68	Medicare Program Integrity Manual, Chapter 4
69	Medicare Claims Processing Manual, Chapter 12
70	Summary Charts - Rahim Shafa Medicare Part B Claims Data
71	Medicare Local Coverage Determination L33632 – Psychiatry and Psychology Services
72	CMS Medicare Learning Network – Evaluation and Management Services
73	SIMONE Summary Chart I
74	SIMONE Summary Chart I
75	SIMONE Summary Chart I
76	SIMONE Summary Chart I
77	Naltrexone and disulfiram pellet implant and injectable packaging and contents
78	Emails between and among Rahim Shafa, Nahid Tormosi and Wayne Moran regarding orders, shipments of, and payments for Naltrexone and Disulfiram

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

By: /s/ Kaitlin J. Brown
Howard Locker
John T. Mulcahy
Kaitlin J. Brown
Assistant United States Attorneys
(617) 748-3638

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/ Kaitlin Brown
Kaitlin Brown
Assistant United States Attorney

Date: January 12, 2024