

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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

GOVERNMENT’S SECOND 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 No.	Description
	<u>Summary Financial Charts</u>
1	Summary Financial Charts
1.1	GARLAND Summary Chart I
1.2	GARLAND Summary Chart II
1.3	GARLAND Summary Chart III
1.4	GARLAND Summary Chart IV
	<u>Shipments Records - Counts 2-4, 6-9</u>
2	June 2016 Shipment (Counts 2, 6, 9)
2.1	June 2016 DHL records of shipments from 1212 Ltd to Rahim Shafa
2.2	June 2016 Credit Card Statement
2.3	June 2016 Email Comms
2.4	June 2016 Email Comms
2.5	June 2016 Invoice for drugs purchased by Rahim Shafa from Wayne Moran
3	November 2017 Shipment (Counts 3, 7)
3.1	November 2017 DHL records of shipments from 1212 Ltd to Rahim Shafa
3.2	November 2017 Credit Card Statement

3.3	November 2017 Email Comms
3.4	November 2017 Invoice for drugs purchased by Rahim Shafa from Wayne Moran
3.5	November 2017 Commercial Invoice for Plastic Beads, Tubes, and Glass Bottles
4	January 2018 Shipment (Counts 4, 8)
4.1	January 2018 DHL records of shipments from 1212 Ltd to Rahim Shafa
4.2	January 2018 Credit Card Statement
4.3	January 2018 Email Comms [1]
4.4	January 2018 Email Comms [2]
4.5	January 2018 Email Comms [3]
4.6	January 2018 Invoice for drugs purchased by Rahim Shafa from Wayne Moran
	<u>Shipment Records</u>
10	April 2013 Shipment
10.1	April 2013 FedEx records of shipments from 1212 Ltd to Rahim Shafa
10.2	April 2013 Credit Card Statements
10.3	April 2013 Email Comms
10.4	April 2013 Invoice for drugs purchased by Rahim Shafa from Wayne Moran
11	April 2014 Shipment
11.1	April 2014 DHL records of shipments from 1212 Ltd to Rahim Shafa
11.2	April 2014 Credit Card Statements
11.3	April 2014 Email Comms
11.4	April 2014 Invoice for drugs purchased by Rahim Shafa from Wayne Moran
12	August 2017 Export

12.1	August 2017 DHL records of shipments from 1212 Ltd to Rahim Shafa
12.2	August 2017 Email Comms Content Package
12.3	August 2017 Email Comms Declaration Discussion
12.4	August 2017 Email Comms Receipt for drugs purchased by Rahim Shafa from Wayne Moran
	<u>Medical Records from Novel Psychopharmacology and Rahim Shafa, MD PC</u>
20	J.R. -- 10.30.12 Implant
20.1	Implant Packaging/Label
20.2	Receipt for Payment
20.3	Medical Record
21	I.A. -- 02.01.13 Implant
21.1	Implant Packaging/Label
21.2	Receipt for Payment
21.3	Medical Record
21.4	Pre-Surgery Paperwork
22	BR -- 08.30.13 Implant
22.1	Receipt for Payment
22.2	Medical Record
22.3	Pre-Surgery Paperwork
23	MM -- 06.25.14 Implant
23.1	Implant Packaging/Label
23.2	Receipt for Payment
23.3	Medical Record
23.4	Pre-Surgery Paperwork
24	D.I. -- Patient File
24.1	Photo of Implant #1
24.2	Photo of Implant #2
25	M.M. -- 06.17.15 Implant
25.1	Implant Packaging/Label
25.2	Receipt for Payment
25.3	Medical Record
25.4	Pre-Surgery Paperwork
26	RB - Excerpt from Patient File
26.1	RB -- June 20, 2015 Payment Agreement
26.2	RB -- June 20, 2015 Consent Form
	RB -- 12.14.17 Implant
26.3	Implant Packaging/Label
26.4	Receipt for Payment
26.5	Medical Record

26.6	Pre-Surgery Paperwork
27	S.M. -- 06.17.16 Implant
27.1	Receipt for Payment
27.2	Pre-Surgery Paperwork
28	W.C. - 7.11.17 Implant
28.1	Implant Packaging/Label
28.2	Receipt for Payment
28.3	Medical Record
28.4	Pre-Surgery Paperwork
29	JP -- 07.07.18 Implant
29.1	Implant Packaging/Label
29.2	Receipt for Payment
29.3	Medical Record
29.4	Pre-Surgery Paperwork
30	K.P. -- 10.20.18 Implant
30.1	Implant Packaging/Label
30.2	Receipt for Payment
30.3	Medical Record
30.4	Pre-Surgery Paperwork
31	J.S. -- 1.31.19 Implant
31.1	Implant Packaging/Label
31.2	Receipt for Payment
31.3	Medical Record
31.4	Pre-Surgery Paperwork
32	C.R. -- Patient File
33	K.T. -- Patient File
	<u>Search Warrant Records from Shafa Residence and Novel Psychopharmacology Locations</u>
40	SHAFa Schedules - 7/2016 - 12/2016
42	SHAFa Schedules - 7/2017 - 12/2017
43	SHAFa Schedules - 1/2018 - 6/2018
44	SHAFa Schedules - 7/2018 - 12/2018
45	Office Visit Coding
46	Naltrexone and disulfiram pellet implant and injectable packaging and contents
47	Implant Ledger Notebook
	<u>Financial Records</u>
51	Cambridge Savings Bank Records for Account ending -0857; held by Nahid Tormosi and Rahim Shafa
51.1	2019 Statements

51.2	2019 Withdrawals
51.3	2019 Deposits
51.4	Supporting Documents
51.5	Statements
52	Cambridge Savings Bank Records for Account ending -0592; held by Nahid Tormosi and Rahim Shafa
52.1	2019 Statements
52.2	2019 Withdrawals
52.3	2019 Deposits
52.4	Statements
52.5	Misc
53	Cambridge Savings Bank Records for Account ending -0600; held by Nahid Tormosi and Rahim Shafa
53.1	2019 Statements
53.2	2019 Withdrawals
53.3	2019 Deposits
53.4	Statements
53.5	Misc
54	Cambridge Savings Bank Records for Account ending -2800; held by Nahid Tormosi
54.1	2019 Statements
54.2	2019 Withdrawals
54.3	2019 Deposits
54.4	2019 Signature Card
54.5	Statements
54.6	Misc
55	Cambridge Savings Bank Records for Account ending -4782; held by Nahid Tormosi and Rahim Shafa
55.1	2019 Statements
55.2	2019 Withdrawals
55.3	2019 Signature Card
55.4	Statements
55.5	Misc
56	Cambridge Savings Bank Records for Account ending -4912; held by Nahid Tormosi d/b/a Metro and Greater Boston CNS
56.1	Statements
56.2	Misc
57	Cambridge Savings Bank Records for Account ending -3209; held by Nahid Tormosi d/b/a Novel Psychopharmacy Care
57.1	Statements
57.2	Misc

58	Bank of America Records for Mastercard ending -4939; held by Nahid Tormosi and Rahim Shafa
59	Citibank Records for Visa credit card ending -8756; held by Nahid Tormosi
	<u>Recordings</u>
65.1	October 2018 UC Visit Video 1
65.2	October 2018 UC Visit Video 2
65.3	October 2018 UC Visit Video 3
65.4	October 2018 UC Visit Video 4
65.5	October 2018 UC Visit Video 5
65.6	October 2018 UC Visit Video 6
65.7	October 2018 UC Visit Video 7
65.8	October 2018 UC Visit Video 8
65.9	October 2018 UC Visit Video 9
65.10	October 2018 UC Visit Video 10
65.11	October 2018 UC Visit Video 11
65.12	October 2018 UC Visit Video 12
65.13	October 2018 UC Visit Video 13
65.14	October 2018 UC Visit Video 14
65.15	Transcript
66	_____, 2018 Wayne Moran-Rahim Shafa Recorded Call
66.1	Recording
66.2	Transcript
67	March 29, 2019 Recorded Call
67.1	x1500 2019-03-29_13-09-50_EDT
67.2	x6868 2019-03-29_13-11-26_EDT
67.3	x6868 2019-03-29_15-12-56_EDT
67.4	x6868 2019-03-29_15-17-58_EDT
67.5	x6868 2019-04-05_15-49-08_EDT
67.6	x6868 2019-04-05_16-13-31_EDT
67.7	x6868 2019-04-06_14-37-57_EDT
67.8	x8599 2019-03-29_13-14-14_EDT
67.9	x8599 2019-03-29_13-42-14_EDT
67.10	x8599 2019-03-29_14-20-47_EDT
67.11	x8599 2019-04-02_14-39-49_EDT
67.12	x8599 2019-04-05_16-17-36_EDT
67.13	Transcript
68	June 2019 Recorded Interview of Rahim Shafa
68.1	Recording
68.2	Transcript

	<u>Emails</u>
70	Jun. 22, 2009 Email to Shafa re "Invoices"
71	Jan. 21, 2011 Shafa-Moran Emails re "6 mos pellet"
71.1	Jul. 25, 2010 Shafa-Moran Emails re "Visit to USA and Implants order."
71.2	Jun. 29, 2010 Shafa-Moran Emails re "Address in San Antonio."
72	Jun. 10-30, 2013 Shafa-Moran Emails re "ORDERING IMPLANTS & REPORT REGARDING THE 2 DEFECTED PELLETTES"
72.1	Jun. 30, 2013 Shafa-Moran Email re "2 early relapses in USA"
72.2	Mar. 2, 2009 Shafa-Moran Email re "Failed pellets actual"
73	Mar. 30-31, 2014 Moran-Shafa Emails re "questions regarding the implant/long acting injection"
73.1	Oct. 25, 2017 Moran Emails re "Rahim's returns"
73.2	Nov. 12, 2017 Moran Emails re "Rahim Shaffa returns"
74	Apr. 11 2014 Moran-Shafa Emails re "Invoice 20140031"
75	Nov. 16, 2014 to Feb. 28, 2015 Shafa-Moran Emails re "New products and New discount system"
76	Mar. 1, 2015 Email fr. Shafa re "20140000Invoice1411"
77	Mar. 4, 2015 Email fr. Shafa re "20140000Invoice1411 (revised & final order March 04, 2015)"
78	Mar. 24 to Apr. 27, 2016 Shafa-Moran Emails re "Australian 6 months naltrexone implant"
79	Sep. 19, 2017 to Oct. 23, 2017 Shafa-Moran Emails re "replacement implants"
80	Feb. 13, 2017 Email fr. Faria re "CPT info requested"
	<u>Travel Records</u>
90	Customs Border Crossings
91	Explanation of Airport Codes
92	American Airlines Records
93	United Airlines Records
	<u>Center for Medicare & Medicaid Services Records</u>
95	Rahim Shafa Medicare Enrollment Application
96	Rahim Shafa MD PC Medicare Enrollment Application
97	Rahim Shafa – Medicare Provider Enrollment, Chain, and Ownership System Report
98	Rahim Shafa, MD PC – Medicare Provider Enrollment, Chain, and Ownership System Report
99	Medicare Program Integrity Manual Ch. 4, Sec. 4.2.1
100	Medicare Claims Processing Manual, Chapter 12, Section 100
100.1	Version Effective 6/1/2011
100.2	Version Effective 1/1/2018

100.3	Version Effective 1/1/2019
101	CMS Medicare Learning Network – Evaluation and Management Services
102	Medicare Local Coverage Determination L33632 – Psychiatry and Psychology Services
102.1	Version Effective 10/1/15
102.2	Version Effective 10/1/16
102.3	Version Effective 1/1/17
102.4	Version Effective 8/1/17
102.5	Version Effective 10/1/17
102.6	Version Effective 10/1/2018
103	Medicare Part B Claims Data for Rahim Shafa
104	Medicare Part C Claims Data for Rahim Shafa
	<u>Summary Charts</u>
110	Summary Chart - Rahim Shafa Medicare Enrollment
111	Summary Charts - Rahim Shafa Medicare Part B Claims Data
112	Summary Charts – Rahim Shafa Medicare Part B Claims by Procedure Code
113	Summary Charts - Medicare Requirements for Evaluation and Management Services
114	Summary Charts – Fee Schedules for Psychotherapy and Evaluation & Management Services
115	Summary Charts – Medicare Part B Claims Billed by Rahim Shafa for Specific Beneficiaries
116	Summary Charts – Medicare Part B Claims Billed by Rahim Shafa for Nursing Home Visits
117	Summary Charts – Medicare Part B Claims for Rahim Shafa During Specific Time Periods
	<u>Other Records</u>
125	Letter from Victory Programs regarding Patient KT
126	Milford Regional Med Center Records for Patient KT
127	Contract between Marraffa & Associates and Rahim Shafa
128	Luann Lombardo License Verification

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

By: /s/ John T. Mulcahy
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 23, 2024