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8 UNITED STATES DISTRICT COURT
9 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 TIEN VO,

14 Defendant.
15
16

Case No.: 23cr1700-AHG

Defendant’s sentencing
memorandum

October 19, 2023, 10:00 a.m.

17
18 Introduction

19 Dr. Tien Vo is a Vietnamese-American citizen who exemplifies the American
20 Dream. He came to the United States with his family as a teenager. He graduated
21 from medical school and established a successful practice in the Imperial Valley,
22 where he provides medical services to impoverished patients primarily of Mexican
23 descent. One hundred and thirty employees rely on Dr. Vo for their jobs.
24

25 Several years ago, Dr. Vo began providing cosmetic services to a small subset
26 of his patients. Around that time, a Mexicali spa owner, Flor Cham, offered low-
27
28

1 cost Xeomin (a Mexican equivalent to Botox) and foreign lip-filler to Dr. Vo, which
2 allowed him to charge lower prices to his patients. In 2018, when Cham was caught
3 importing these cosmetics into Calexico, the government opened an investigation,
4 leading to this prosecution.
5

6 Dr. Vo and the government have worked extensively to settle the
7 investigation. He pleaded guilty, pre-indictment, to two misdemeanors, and the
8 parties are jointly recommending three years of probation, financial penalties
9 exceeding \$300,000, and 100 hours of community service, but neither believe
10 electronic monitoring is necessary or appropriate.
11

12 The individual before the Court, and the offense

13
14 The PSR provides a good overview; Dr. Vo will highlight a few points.

15 He was raised in poverty in rural Vietnam. As a child, he had to work to help
16 the family survive. His mother died from kidney disease when he was ten.
17

18 A few years later, his family moved to California. He had to learn a new
19 language and adapt to a new culture. He worked extremely hard in school, taking
20 college classes while still in high school. After graduating from U.C. Riverside, he
21 completed medical school in the Dominican Republic and residencies in New York
22 and Arizona. He then returned to California and started a practice in internal
23 medicine. Meanwhile, he fell in love, and he and Venus have been married for nearly
24 twenty years. They had a son, Benjamin (14), and adopted their daughter Ivy (13).
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1 When Dr. Vo wanted to establish a long-term practice, he learned the Imperial
2 Valley had a real problem. Its population was poor and in poor health – obesity and
3 diabetes, for example, are off the charts. And doctors didn’t want to work there.
4 The medical desert in the desert provided a win-win opportunity for him and for the
5 community, so the Vo family packed its bags and moved to El Centro and has been
6 there ever since.
7

8
9 Dr. Vo didn’t just move to the Valley; he
10 became fully integrated into the community.
11 He sponsors baseball teams, leads food drives,
12 provides free medical services to field workers,



Dr. Vo with a team he sponsors

13 gives free medical examinations and vaccinations to students so they can enroll in
14 school and participate in sports, volunteers at health fairs, and even makes house
15 calls throughout the community. His tireless dedication is captured in the
16 numerous attached letters of support.
17

18
19 When Covid ravaged Imperial County, Dr. Vo became a force of nature. He
20 set up testing and vaccination clinics at schools, senior centers, and homeless
21 shelters. He went to the border to test and vaccinate field workers. As Calexico’s
22 (now-retired) Chief of Police notes, Dr. Vo “provided personal protective equipment
23 to the police and fire departments when the California Office of Emergency Services
24 and FEMA’s shipments did not arrive on time.” Dr. Vo worked with the San Diego
25 Regional Center to assist its developmentally disabled clientele. Its manager of
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1 client services, Joab Gonzalez, writes that “Dr. Vo quickly organized special clinics,
2 and hundreds of individuals and their families got tested and or vaccinated to keep
3 them safe.” Sylvia Chavez, the Mayor pro tem of Calipatria praises Dr. Vo for
4 creating a “Meals to Heals” program that delivered daily dinners to Covid families
5



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12 *Dr. Vo serving the homeless*

seven days a week. Sonia Carter,
a City Council member in El
Centro succinctly calls him
“Superman” and “a hero in my
eyes and the community.”

13 While he has a deep belief in charity, Dr. Vo also has a strong entrepreneurial
14 spirit. Over the years, his practice expanded as he brought on doctors, nurse
15 practitioners and dozens of other employees. It was during this period of growth
16 that he added a cosmetic practice. He took a cosmetic course in San Diego, and,
17 certificate in hand, began offering basic cosmetic treatments to his patients. As
18 stated, a woman named Cham offered him a lower cost Mexican-branded form of
19 Botox and a foreign lip-filler. Dr. Vo agreed, bought a small amount from her, and
20 then continued to buy a few boxes at a time from her when she would reach out to
21 him, passing on the savings to his patients.
22
23

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Cosmetics was a tiny percentage of Dr. Vo’s practice, less than two percent of
the revenue. And during the pandemic it dried up nearly completely. Indeed, when
an undercover agent sought a consult, Dr. Vo had trouble remembering the active

1 ingredient of the Botox.¹ And when the agents searched his offices in October 2020,
2 some of the cosmetics were so old they were beyond their expiration date.²

3 After the search, Dr. Vo retained counsel, and has been in discussions with
4 the government ever since. He also made substantial changes to his practice, and
5 has put in place numerous compliance procedures. He also signed up for and
6 completed continuing medical education classes focused on ethics. And he has
7
8 relinquished ownership of his practice.
9

10 The parties worked diligently to settle the investigation, ultimately agreeing
11 on misdemeanors, probation, and a large financial penalty. One consideration was
12 that Flor Cham, the actual smuggler who shopped the cosmetics to Dr. Vo – and who
13 was importing fake Viagra for her other customers, not Dr. Vo – is charged with a
14 misdemeanor. Another is that in a recent case in Michigan, a doctor was ordering
15 foreign Botox, administering it to patients, and billing Medicare for it, but the
16
17 government resolved the matter civilly, not criminally:
18
19
20

21 ¹ The active ingredient is botulinum toxin. Like Kleenex for tissue or Band-Aid for
22 adhesive bandages, everyone uses the term Botox generically, whether referring to
23 the actual brand or to any other medication containing the same active ingredient.

24 ² The search was publicized in the El Centro press. As the PSR documents, there
25 were other allegations against Dr. Vo from his competitors. Dr. Vo's expansion in
26 the Valley ruffled feathers among others whose practices were impacted.
27 Ultimately, the government executed a second search warrant apparently focusing
28 on his billing practice. Of course, he was never charged with any billing-related
offense. And as the government will acknowledge, Dr. Vo *never* billed Medicare or
Medical for any cosmetics. The government does not pay for purely cosmetic
procedures, and Dr. Vo never sought compensation for them.

PRESS RELEASE

Grand Rapids Physician Pays Over \$135,000 For Allegedly Using Foreign, Unapproved Botox to Treat Medicare Beneficiaries

Tuesday, May 23, 2023

Share



For Immediate Release

U.S. Attorney's Office, Western District of Michigan

GRAND RAPIDS – U.S. Attorney for the Western District of Michigan Mark Totten today announced that Derek Lado, D.O., and his Grand Rapids practice, Elite Medical Spine & Musculoskeletal Center PLLC (Elite), have agreed to pay \$135,871.84 to resolve allegations that they violated the False Claims Act by using foreign, unapproved Botox to treat Medicare beneficiaries and then billing Medicare for those services.

Pleading guilty to any crime was a devastating blow to Dr. Vo, particularly as a well-known doctor with a large practice in a small community. On a personal level, it is a humiliating reflection of his own personal failing, one he deeply regrets. And on a professional level, there are collateral consequences with the Medical Board.

While the future is uncertain, Dr. Vo blames no one else. He wishes he could turn back time and make better decisions. Though of course he cannot, he is extremely remorseful, and committed to avoiding any future violations.

The Guidelines and sentencing issues

The parties agree on the Guidelines calculations:

Base offense level:	6
Loss greater than \$40,000:	+6
Multiple victims:	+2
Abuse of trust/special skill:	+2

1 Acceptance of responsibility: -3
2 Combination of circumstances departure: -2

3 Additionally, as the PSR notes and the government agrees, Dr. Vo is eligible
4 for the new zero-point offender departure under § 4C1.1, for an additional two-level
5 downward adjustment.

6 At an adjusted offense level of 9, the guidelines sentencing range is 4-10
7 months. However, the government and Probation join Dr. Vo in recommending a
8 non-custodial sentence. As the Court knows, the Guidelines recommend a non-
9 custodial sentence for nonviolent first offenders who, like Dr. Vo, land in Zone A or
10 B of the sentencing table. See USSG § 5C1.1, commentary, application note 4.
11

12 Here, probation is appropriate, as all parties agree.
13

14 **Terms of Probation**

15 Dr. Vo will address the PSR's recommended terms below, but here are the key
16 terms he recommends along with the government:
17

- 18
- 19 **1. Three years of probation.**
 - 20 **2. 100 hours of community service.**
 - 21 **3. A fine of \$201,354.**
- 22

23 The parties agree on a fine just over \$200,000, double the amount his patients
24 paid for their treatments. This fine is more than 10 times higher than the
25 high end of the fine table for offense level 9. USSG §5E1.2(c)(3). This amount
26 is also far more than the actual profits, since the cost of the cosmetics was
27 approximately \$40,000, and Dr. Vo's practice received approximately
28

1 \$100,000 in payments from his patients. The gross profits, therefore, were
2 around \$60,000 (over 4 years), but that doesn't account for overhead –
3 employee salaries, office expenses, etc. While impossible to pinpoint, the
4 actual net profit to Dr. Vo personally was surely less than \$10,000.
5

6 **4. Forfeiture of \$100,767.**

7 Dr. Vo will pay back the full amount his practice received from the patients.

8 The government sought to identify every cosmetic patient but has received
9 responses from only a small number. The parties agree to set the matter for
10 a final restitution hearing to allow time for any additional claims to trickle in.

11 The parties anticipate the actual claims will involve a relatively small
12 percentage of the \$100,000 forfeiture, and the remainder will go to the
13 government.
14

15 Dr. Vo has provided undersigned counsel with the full amount of the financial
16 penalties. Counsel will pay the fine immediately. The parties have agreed that any
17 restitution payments will be credited against the forfeiture, and since the restitution
18 will be determined later, counsel will pay the full amount of restitution and the
19 remaining amount of forfeiture immediately upon the conclusion of the restitution
20 hearing.
21

22 Dr. Vo has reviewed and accepts the terms of probation outlined in the PSR,
23 with the following comments and recommendations. Dr. Vo notes the “standard”
24 terms of probation outlined in paragraph 134 of the PSR are not mandatory but fall
25
26
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1 entirely within the Court’s discretion. *See United States v. Montoya*, --- F.4th --- (9th
2 Cir. September 13, 2023) (en banc) (“the district court retains full discretion over
3 the decision to impose [“standard” terms], subject only to the requirements of 18
4 U.S.C. § 3583(d)(1)-(3), based on its individualized assessment of the defendant.”).³
5
6 And like terms of supervised release, any term of probation must be reasonably
7 related to the goals of deterrence, protection of the public, and rehabilitation, and
8 may not involve any greater deprivation of liberty than is reasonably necessary to
9 fulfill these goals. *United States v. Napulou*, 593 F.3d 1041 (9th Cir 2010).

11 Under this rubric, some of the recommended terms are unnecessary. Dr. Vo
12 therefore asks the Court for the following modifications:

- 14 1. Not to impose any travel restriction (proposed condition 3), or to limit
15 travel to the United States.
- 17 2. Not to impose the firearms-related restrictions (proposed condition 10).

18 While Dr. Vo does not maintain firearms, he has not been convicted of any
19 felony and there is no basis to restrict his Second Amendment-protected
20 activities.

- 22 3. Not to impose the third-party risk condition (proposed condition 12). Dr.
23 Vo cannot conceive of a scenario in which a third-party notification would
24 be required. Should one potentially come up, a better approach would be
25

27 ³ Although *Montoya* addressed conditions of supervised release, its reasoning
28 applies to all non-mandatory terms of probation under 18 U.S.C. § 3563.

1 for Probation to meet and confer with Dr. Vo and his counsel, and if the
2 parties are not able to agree, the Court could be asked to decide if it is
3 necessary.
4

5 Turning to the proposed “special” conditions of probation in paragraph 135,
6 Dr. Vo notes the following:

- 7
- 8 1. A search condition is not necessary here (proposed special condition 1). He
9 acknowledges the proposal is cabined by a reasonable suspicion
10 requirement, which provides some comfort, but here a search condition is
11 unnecessary.
12
 - 13 2. Dr. Vo has no objection to the community service requirement proposed in
14 special condition 2.
15
 - 16 3. Dr. Vo will pay his financial obligations immediately. He therefore
17 suggests there is no need for him to provide complete disclosure of his
18 personal and business financial records (proposed special condition 3).
19 What would be the purpose?
20
 - 21 4. There is no compelling need to place Dr. Vo on location monitoring
22 (proposed special condition 4). The government is not asking for it. Dr. Vo
23 has been exposed to significant press coverage, has suffered the shame and
24 public humiliation as a medical doctor whose businesses have been raided
25 and whose guilty plea was publicized; he has been cut off from numerous
26 insurance carriers, and is subject to discipline with the California Medical
27
28

1 Board. He will pay a large fine and be on federal probation for three years.
2 That is substantial punishment, and more than sufficient to comply with
3 the 3553(a) factors. Further, it is unwieldy for a doctor to wear a GPS
4 bracelet. If noted, it could hamper the sacred doctor-patient relationship,
5 not to mention the potential for interference with sensitive medical
6 equipment. It's simply not needed or appropriate here.
7
8

9 **Conclusion**

10 Dr. Vo once again apologizes to the Court for his transgression. He thanks
11 the Court for its time and consideration, and urges it to honor the parties'
12 recommendation for a probationary sentence.
13

14 Respectfully submitted,

15 Dated: October 18, 2023

16 s/ Jeremy Warren
Jeremy Warren

17 s/ Michael Aguirre
18 Michael Aguirre
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Attachment - Support Letters

<i>Name</i>	<i>Position</i>
1. Angie Pena	El Centro School Trustee
2. Margaret Sauza	Executive Director, Sure Helpline
3. Joab Gonzalez	Manager, San Diego Regional Center
4. Sonia Carter	El Centro City Council Member
5. Sylvia Chavez	Calipatria City Council Member/Mayor
6. John Cabrera	AmeriCorps Project Specialist
7. Gonzalo Gerardo	Chief of Police, City of Calexico (Ret.)
8. Eduardo Singh	Palo Verde School District
9. Pastor Chris Nunn	Christ Community Church
10. Chuck Fisher	Former El Centro School Trustee
11. John Strong	Medical Doctor
12. Masoud Afshar	Medical Doctor
13. Sylvia Bernal	Health District Trustee
14. Gloria Romo	Calexico City Council Member
15. Rosalind Servin	Brawley Feed the Need (NGO)
16. Maribel Padilla	Brown Bag Coalition (NGO)
17. Raymond Gonzalez	American Legion Commander
18. Eduardo Garcia	California State Assembly Member
19. Tony Gallegos	American Citizen Club
20. Eric Reyes	<i>Los Amigos de la Comunidad</i>

5/23/2023

To whom it may concern,

I currently hold a position as El Centro Elementary School District board of Trustee. I am writing this letter to show my support for Dr. Tien Vo / Vo Medical, a community leader who has demonstrated exceptional commitment and dedication in helping the community during the pandemic and to present time.

During the pandemic, Dr. Vo provided food for individuals who tested positive for Covid and couldn't leave their homes "Meals to Heal". He was an instrumental key in providing vaccines and Covid testing to field workers at 2 am at the Calexico border, provided Covid vaccines for individuals with developmental disabilities when nobody in our county would step up to the plate, and made home visits for senior citizens when they had Covid and didn't have transportation for medical attention. Dr. Vo also organized massive vaccine events in rural areas and has provided vaccines to the homeless population in collaboration with churches in our county. He has gone above and beyond in ensuring that everyone has access to healthcare services, regardless of their background or circumstances.

Dr. Vo has been at the forefront of numerous efforts aimed at providing critical healthcare services to the community. He also has and will continue to conduct physicals for students in all school districts who have no insurance and is working closely with the school districts to provide school immunization so students are able to start school on time. This has open opportunities for students to participate in sports like never before. His efforts have been instrumental in ensuring that vulnerable populations have access to the healthcare services they need to stay healthy and safe such as a small rural town called Palo Verde, Blythe.

Dr. Vo's leadership and tireless efforts have been a source of inspiration for the community and have impacted all School districts in Imperial County and Palo Verde. I have no doubt that he will continue to make a positive impact on the lives of those around him.

Sincerely,



Angie M Peña



654 W Main St.
El Centro Ca, 92243
Administrative Line (760) 352-7878
Rape Crisis Line: (760) 352-7273 --- 24-Hour Crisis Line (760) 352-7873
Toll Free (877) 780-7776
www.surehelplinecrisiscenter.org

5/22/2023

To whom it may concern,

I am writing this letter in support for Dr. Tien Vo, Vo Medical, a healthcare practice that has been serving the community with dedication and compassion for many years. I currently hold the position of Executive Director for Sure Help Line.

Dr. Vo has been a leader in the healthcare industry, providing exceptional medical care to his patients and serving as an inspiration to his colleagues. He has been recognized for his work by organizations such as Sure Help Line, which honored him at their 2022 Annual Gala event. The money raised from this event goes to benefit victims of domestic and sexual violence. Dr. Vo's efforts during the pandemic have been particularly noteworthy, and his tireless dedication to his patients and the community have been an inspiration to us all.

This year, Dr. Vo's wife, Venus Nguyen, has been nominated to receive a recognition award for the continuing work that Dr. Vo and Venus have been doing to serve the community. Dr. Vo's selflessness and hard work have been a source of inspiration to all of us, and I have no doubt that he will continue to make a positive impact on the lives of those around him.

I wholeheartedly support Dr. Vo and Vo Medical. His leadership and commitment to the community make him an exceptional role model, and I am confident that he will continue to make a difference in the lives of those he serves.

Sincerely,

Margaret Sauza
Executive Director

A handwritten signature in blue ink that reads "Margaret Sauza". The signature is fluid and cursive, written over the typed name and title.

May 22, 2023

To whom it may concern,

My name is Joab Gonzalez and I'm currently employed as a Manager of Client Services at San Diego Regional Center Imperial Valley Office. May this letter serve as testimony of the support this community has received from Dr. Vo, Vo Neighborhood, and Vo Clinics around Imperial County. Dr. Vo has done incredible work to keep our communities safe especially during the COVID 19 Pandemic. Dr. Vo had testing, vaccination, and treatment of COVID 19 without regard to his safety, safety of his team, and safety of volunteers. Imperial Valley got hit very hard with COVID 19 and thanks to brave men and women like Dr. Vo, we now thrive and are flourishing.

I work for an agency that serves developmentally disabled individual of all levels. When San Diego Regional Center was struggling to secure testing, and vaccination during the worst of the pandemic, Dr. Vo quickly organized special clinics and hundreds of individuals and their families got tested and or vaccinated to keep them safe.

I'm well aware that Dr. Vo has vaccination for children, youth, adults, farm workers, and offers medical services to very vulnerable individuals in our communities. I've lived and worked in Imperial County my entire life and while I have seen very active and hard-working doctors, however, none of them come even close to what I have witness with Dr. Vo. Dr. Vo serves individuals in all four corners of Imperial County including communities that are rural and with little or no resources. His approach is not, come by see me in my office. His approach has been, let's assemble a team and go serve them in their communities as many may have limited or no transportation.

Respectfully and sincerely,



Joab Gonzalez

Sonia Carter

324 San Diego Ave.

El Centro Ca. 92243

442-271-5806

Soniacarter77@yahoo.com

May 19, 2023

To whom this may concern,

I am writing this letter on behalf of Dr. Vo (Superman). I have had the honor of seeing his work performance firsthand, as well as working side by side with him. Doctors save lives, but their importance goes far beyond that. Doctors also make a difference by what people see them accomplish. I have witnessed how hard working and dedicated Dr. Vo is. I spearheaded a health fair conducted by Social Justice to help the underserved community. With no hesitation Dr. Vo and his team came out and helped so many families of all nationalities. He is a hero in my eyes and the communities. Dr. Vo has an ethical commitment to the Imperial Valley in which he lives and works.

The importance of having a nonstop doctor in our community is needed. Dr. Vo is connected to the community, and he has goals to improve it, and make it a better place for all of us who live in the Imperial Valley. My name is Sonia Carter and I currently serve on the El Centro City Council. Please, do not hesitate to contact me if you have questions.

Respectfully,



Sonia Carter

May 22, 2023

RE: Letter of Support

To Whom It May Concern,

My name is Sylvia R. Chavez and I currently serve as Mayor Pro Tem for the City of Calipatria.

I would like to extend this letter of support to Dr. Tien Vo M.D.

In March of 2020 when the first coronavirus related activity restrictions were issued, a quarantine order required individuals exposed to stay at home. As the coronavirus cases increased and limited vaccines were not yet made available to the Imperial County, Dr. Vo and his staff took the initiative to slow down the spread by creating the "Meals To Heal" program. I reached out to Dr. Vo to volunteer for this program. Our mission was to stop the spread of covid-19 in our Imperial County/Imperial Valley. Meals to Heal delivered daily dinner meals to our covid-19 families seven days a week until December of 2021.

In addition to this selfless program, Dr. Vo and his dedicated staff have served and delivered hundreds of meals to our Calipatria senior citizens during the holidays, ongoing covid-19 vaccines and health checks to our Calipatria residents, ongoing covid-19 testing to our school staff and ongoing sport physicals to our Calipatria High School Athletes.

The services he provides and continues to provide to our underserved Calipatria community are clearly invaluable.

Please accept this letter of support on my behalf. Should you need any more information, I may be reached at (760) 550-5675 or via email at sylviamona@hotmail.com

Sincerely,



Sylvia R. Chavez

To whom it my concern

This letter of support if for Dr. Vo,

I've had the privilege of witnessing all the great and amazing work Dr. Vo has done for our community for the last several years. I am forever grateful for the leadership he provided during uncertain times during the pandemic.

It's been a great benefit having Dr. Vo in our Imperial Valley, he was very proactive with his outreach team and our AmeriCorps program to provide support to Imperial County. I saw firsthand how dedicated Dr. Vo was and has been to test and providing preventative care.

My name is John Cabrera, I currently serve as an AmeriCorps Project Specialist for Imperial County Office of Education.

A handwritten signature in blue ink, appearing to read "John", with a large, stylized initial "J" and a horizontal line extending to the right.

Gonzalo Gerardo (Hon. Ret. Police Chief)
671 Mc Carran CT W
Imperial, CA 92251

May 22, 2023

Re: Dr. Tien Vo

To: Assistant United States Attorney

I have known Dr. Tien Vo for a little over four years now. I know that Dr. Vo is currently going through some legal matters. I saw Dr. Vo's work firsthand before the COVID-19 Pandemic. He began his practice in Calexico while I was the Chief of Police and saw how he helped our low-income community with healthcare.

During the pandemic, I witnessed DR. Vo make home visits to the senior citizens at all of our senior housing centers. He would go out of his way after hours to treat people who were very sick and could not go to his clinics. Dr. Vo also provided personal protective equipment to the police and fire departments when the California Office of Emergency Services and FEMA's shipments did not arrive on time. He also partnered with our local City and County Health Officials and ran a successful Covid testing and inoculation drive-up at the Calexico 10 theaters parking lot. I understand he has treated over 80,000 patients from Imperial County and Mexicali, Baja California, Mexico, and still sees many of them.

Dr. Vo continues to envision a way to assist our Law Enforcement and Imperial County Mental Health with ways to provide medical clearances and testing for prisoners and patients entering their facilities.

It is my sincere hope that you consider my letter when deciding what decision you are going to make in his case. Dr. Vo has a lot to offer our low-income and often forgotten community.

If you have any further questions, please do not hesitate to call me at (760) 455-9778.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Gerardo', with a stylized flourish at the end.

Gonzalo Gerardo, Honorable Retired Police Chief



PALO VERDE
Unified School District

"Improving Learning...Together"

825 N. Lovekin Blvd., Blythe California 92225
Telephone (760) 922-4164
Fax (760) 922-5942

Board of Education

Diana Esquibel Mendez
Martha Gutierrez
Alfonso Hernandez
Jamey Mullion
Stephanie Romero

Tracie Kern
Superintendent

May 31, 2023

To Whom It May Concern:

It is with exceptional pleasure and ease that I write this letter of support for Dr. Tien Vo. Over the last three years, Dr. Vo and the Palo Verde Unified School District have partnered together in providing mandated health services for the students and community of Blythe. Dr. Vo has focused primarily on immunizations (shots) needed before starting pre-kindergarten and immunizations required to enter 7th grade with health physicals.

California law requires that all students attending public or private school be vaccinated against certain infectious diseases to keep themselves and their classmates safe. The school must have a copy of each student's vaccination record on file. The best place to receive vaccinations is typically at your local doctor's office. The absences of health care providers in the community prohibit our students and community to obtain vaccines at a local office. It has been necessary for the Palo Verde Unified School District to reach out to our adjacent county and Dr. Vo Neighborhood for free vaccination clinics held at our District office to support the health needs of our students. Through this partnership, the Palo Verde Unified School has been able to vaccinate 98% of the students currently attending school and has been able to increase the amount of health physicals required to attend school and/or participate in sports programs. Dr. Vo's generosity and servant's heart for the students and community of Blythe have drastically improved the health services of many families.

Leading staff, students and the community through these times requires confidence, strength of character, and commitment. Dr. Vo has all the aforementioned characteristics to help organization like the Palo Verde Unified School District to meet all the compliance requirements by providing all the necessary vaccines and health physicals to help students stay in school. Dr. Vo goes the extra mile by his total commitment to the district by continuing his partnership over a three year period that assures full compliance with state and federal regulations.

The Palo Verde Unified School District without reservation supports Dr. Vo and his character above all else. This severely medically under-served community would suffer without his influence and mandated health services. Should you have any further questions regarding Dr. Tien Vo, please do not hesitate to contact me at (760) 922-4164.

Sincerely,

Edward Singh, M.A. School Psychologist
Director of Special Services
Palo Verde Unified School District
(760) 922-4164
edward.singh@pvusd.us



5-18-23

To Whom It May Concern:

Greetings! I am writing this letter of support on behalf of Dr. Tein Vo. Over the last five years, Dr. Vo and Christ Community Church have had the blessing of partnering together in community outreach and engagement. I have witnessed Dr. Vo's generosity and servant's heart for the people of the Imperial Valley first-hand.

Dr. Vo has spent countless hours responding to the COVID-19 pandemic. When many in his field were still processing the risks and severity of the infection, Dr. Vo was making arrangements for his children to live with family so that he and his wife, Venus, could aid the sick. Dr. Vo was the first to respond with mass testing sites in the region. The way he and his staff mobilized to tend to the sick is to be commended. I shudder to think of what the conditions would have been like in our grossly medically underserved community had Dr. Vo not been so readily capable and willing to serve.

Christ Community Church was privileged to operate alongside Dr. Vo and his staff at the height of the pandemic. Some of our members helped to process the hundreds, if not thousands, of patients daily seeking test results. Additionally, Dr. Vo had the vision of delivering meals to COVID-positive patients, thus limiting their need to leave their homes and risk spreading the infection. Our church was blessed to be able to prepare these meals for Dr. Vo and his staff to hand deliver to patients.

Aside from Dr. Vo's willingness to work alongside the faith-based community, I am also keenly aware of Dr. Vo's passion for serving other underprivileged sectors of our county. For example, he has often traveled to provide healthcare clinics to surrounding areas, including Niland, The Slabs, and the tribal communities. Additionally, Dr. Vo has provided free student physicals at many local schools.

Dr. Vo has been an absolute godsend to this community. He has been a steady source of generosity, encouragement, healing, and hope for many people during their most difficult times. The Imperial Valley is blessed to have a man of his abilities who has also displayed a willingness to serve. This severely medically under-served county would certainly suffer without his influence and service.

Dr. Vo is also my trusted family physician. His attentiveness and care for my family during their seasons of sickness have garnered my admiration and respect. My family and I are personally grateful for his business and practice.

Over the years, Dr. Vo has become a valuable partner in ministry service alongside Christ Community Church. I foresee even more opportunities for Christ Community Church and Dr. Vo to partner together to serve the Imperial Valley in the future.

Please feel free to contact me with any questions.

Serving Jesus,



**Chris Nunn
Senior Pastor, Christ Community Church of Imperial Valley**

Chuck Fisher
734 Desert Garden Drive
El Centro, CA 92243
Chuckfisher68@yahoo.com

May 20, 2023

To Whom It May Concern:

My name is Chuck Fisher. I am a retired school administrator and a former elementary school board trustee. I have personally experienced the support Dr. Vo has shown our community.

During the Covid pandemic he organized a program to deliver meals to those without support and homebound suffering from covid. Food was delivered from one end of Imperial Valley to the other.

Also, during the Covid pandemic he organized several Drive-thru clinics to provide vaccines and booster shots. I remember one clinic where we inoculated almost 800 individuals.

Beside the vaccine clinics he also implemented Covid 19 testing sites to support the community.

Dr. Vo has supported several school districts in the area by holding clinic to inoculate students to meet the California state requirement. Additionally, he has offered his services to travel to the school district to provide health physicals for athletic population.

At Thanksgiving time over 2,000 meals were delivered to the under-served in the Imperial Valley.

I can't count the number of times Dr. Vo has pitched the first ball in a Little League game where he has furnished uniforms or otherwise supported the teams. He does the same for our soccer groups.

He has supported veterans with recognition and meals and just this week he sponsored meals at a senior citizen health fair.

Our community is grateful of the many ways Dr. Vo and his staff have supported us.
And we are better for it.

Sincerely,

A handwritten signature in cursive script that reads "Chuck Fisher".

Chuck Fisher
Support

May 22, 2023

Letter of Support for Tien Vo, M.D.

I have known Dr. Vo since 2012, when he covered for me briefly while I was on vacation, and later when I was looking to sell my practice before going to South America. I heard a lot of glowing comments from hospital staff and all thought he would do a great job of taking over the practice. Other doctors were offering to buy the practice but I decided to give it to him instead since I thought he was the best of the younger "breed" of doctors in the Valley. I have never regretted it. I also never dreamed I would end up working alongside him just a few years later. He is more like my second son than my boss.

Dr. Vo is a classic American success story. He was a refugee to the States in his mid-teens but had the drive to work on his English and other studies to complete medical school in his 20's. He is the most innovative and forward thinking doctor I have ever met or even heard of (in my 44 years of practice). He is also one of the most helpful and ethical doctors I have known. He is always trying to make a difference, even when it is giving money for lodging a homeless patient in the middle of summer and it is 110 degrees outside.

The era of Covid-19 revealed Dr. Vo as a warrior for protecting the health of the community. He was almost prescient in seeing what was coming at this country in the form of a contagion. While other physicians (including myself) were immobilized and just waiting to be told what to do, he was the risk-taking trail blazer. He figured out how to get the testing materials and equipment that he had to purchase when most were clueless. He set up mass testing sites in El Centro, Calexico, and a smaller one in Brawley. Over a thousand patients daily were commonly tested between these sites. He had a team reporting the results to patients that worked late into the night and he individually treated probably more patients than any doctor in the entire country. He purchased a van to be able to go out for testing and later for vaccinations at the sites where farm workers would gather for a bus to the fields at 2 AM. He drove to various local schools for vaccination of numerous students and even out of the county to the isolated Riverside County community of Blythe to do more at their schools. He and his wife started Vo Neighborhood Medical Clinic, and more than a hundred volunteers stepped up to participate in feeding families stuck at home with Covid-19 and in mass vaccinations at the local bowling alley parking lot. One week approximately 14,000 were vaccinated and this would not have been possible without the high esteem that he is held in by many volunteers, including my wife.

Dr. Vo continues to reach out to the underserved of Imperial County and recently also to Riverside County. A new, larger clinic in Brawley is going to be primarily for the least served patients in the north end of Imperial County and will provide a facility that will encourage more specialists to care for this population. Free clinics, involving a few volunteers, have been done with farm workers and families in the Mecca or Thermal areas (Riverside County) after closing of a nearby clinic. He makes many house calls, even in the heat of summer, seeing homebound patients in several local cities that no other physician will see.

Dr Vo is setting up the new clinic in El Centro with improved capability of dealing with another epidemic besides being able to provide clinical areas for specialists and the necessary logistical support to enable better quality of care for our large population base. He is highly respected by many of the local

physicians but there is animosity from some quarters that seems to be based on jealousy over his success. He has a team of providers that get along well even though in several locations – including Indio now (Riverside County). He is a great team leader and has encouraged many employees to advance in their career in the health sector. We have jointly helped train many nurse practitioners and some physician assistants for this area and even other areas of California.

Dr. Vo asked me why he is important to the community. Most providers are interchangeable with similarly trained providers. One experienced FP is almost the same as another experienced FP. One inexperienced IM doc is almost the same as another inexperienced IM doc. Dr. Vo is not like anyone I have even heard of. He literally does not need much sleep and can out work any doc. He is more creative about solutions than anyone I have ever met. I jokingly refer to him as Superman and I am an aging Batman (who still has a lot of energy but a fraction of his). It would take a team to replace him and then it probably would fail since the team would, of course, argue.

John M. Strong, M.D., Family Physician
CA – G85954

A handwritten signature in black ink, appearing to read "John M. Strong". The signature is stylized with a large, circular initial "J" and a long, sweeping underline.

To whom it may concern,

I am writing this letter to give you my honest opinion regarding Dr. Vo.


I am a board-certified physician practicing nephrology (kidney disease) in the Valley for more than ten years. I had the opportunity to get to know Dr. Vo very well while we were working closely in the hospitals and in his private practice. I found him a very knowledgeable physician, responsible and hardworking. He cares about his patients and treats them to the highest standards. I was the Chief of Medicine Department at ECRMC from 2016-2020, I did not receive any single complaint from patients or hospital staff about Dr. Vo during this time. He has been very professional and respectful toward other colleagues.

Since he moved to private practice, he has helped thousands of patients to have a better life. He has expanded his practice during the last few years with hard work and providing excellent care for the patients. He has elevated the quality of care in the Valley and thousands of the patients depend on his service to stay healthy.

Dr. Vo and his wife are known for their numerous charitable works in the city. They have changed lives of numerous underserved individuals to the better through their kindness and generosity. Over the years they have spent a large amount of their time and money to help people in need, no other physician in town comes even close to them. Dr. Vo also has been very helpful and supportive of his colleagues. I know firsthand that he has helped several other doctors who were in financial difficulty without any expectation.

In a personal level I found Dr. Vo extremely honest and trustworthy individual. He is the friend you can count on. He is a family man with high morals. He has my outmost respect.

With regards,


Masoud Afshar MD.

05/18/24

CHARACTER LETTER

May 20, 2023

To Whom It May Concern:

I am pleased to write a character letter for Dr. Tien Vo. My name is Sylvia Bernal and I have personally known Dr. Vo for the last ten years. As my primary care physician, he has gone above and beyond to care for me. In the past ten years I have known him professionally and personally.

Dr. Vo has outstanding moral values who cares deeply about his community. During the pandemic, he conducted home visits to his patients who were quarantined, myself included. He also provided meals during the pandemic. He is the only physician in my area who conducts home visits to his patients.

I am a long-standing citizen who is very active in her community and Dr. Vo has often contributed to local causes.

If you would like more information or would like to speak to me personally, I can be reached at (760) 427-3976.

Respectfully,

A handwritten signature in black ink that reads "Sylvia Bernal". The signature is fluid and cursive, with the first name "Sylvia" and last name "Bernal" clearly distinguishable.

Sylvia Bernal

Heffernan Memorial Healthcare District Board of Directors Member

Gloria Guadalupe Romo

City of Calexico, Mayor Pro Tem

May 20, 2023

TO WHOM IT MAY CONCERN:

As an elected official of the City of Calexico, the health and well-being of our community is extremely important to me. The community of the City of Calexico has enjoyed the support and kind dedication of Dr. Tien Vo through his *Clinic Vo Medical Center*. Dr. Vo has been very important to us because he has provided accessible medical care to our residents, especially to those who work in the fields and low-income families.

During the pandemic, Dr. Vo was very dedicated and sensitive to the needs of the population, because Dr. Vo was at the forefront evaluating thousands of people and distributing vaccines even to people in rural areas.

Dr. Vo also invests very generously in our youth, sports, and other public community events.

I fully support and trust him when it comes to providing quality healthcare services to our community.

Respectfully,



Cell: (760) 592-3503

Email: romogloriag@yahoo.com



To whom it may concern,

My name is Rosalind Servin Founder/CEO of Brawley Feed the Need, Inc a 501(c)(3) non-profit organization that helps those in need 5 days a week in the city of Brawley. I met Dr. Vo a couple of years ago and have partnered with him in a few ways. One being when together we served 1,200 individuals on the North end of Imperial County for Thanksgiving Day in 2022. Dr. VO is very community driven and a definite asset to our entire county.

Dr. Vo and his team also provide a meal for 50 every Wednesday of every month to my organization in which we use to feed the community.

I consider Dr. Vo a trustworthy, kindhearted, community minded person.

I believed in what he does and I support his efforts to better our Imperial County.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosalind Servin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rosalind Servin



**Brown Bag Coalition
P.O. Box 1881
El Centro CA 92244-1881
760-997-2140**



May 22, 2023

To Whom It May Concern

Brown Bag Coalition is a non-profit organization that serves the homeless population in Imperial County but mainly in Calexico.

We've had the pleasure of collaborating with Dr. Vo and his medical center for several years now. Dr. Vo is one of our feeders who sponsors and delivers homeless dinner to Calexico's homeless population at our feeding location once a month. He has supported us by letting us use a large room in his clinic for our Christmas event and has sponsored dinner for our Thanksgiving event as well.

Dr. Vo's generosity is definitely an asset to our community, the help afforded to our organization is invaluable and much appreciated.

If you should have any questions you can reach me at 760-997-2140.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maribel Padilla'.

**Maribel Padilla
Co-Founder/President**



Making a difference ONE brown bag at a time

**501(c)(3) Non-Profit Organization ID# 81-3707351
*Please save this letter for tax purposes acknowledging that you have received no goods or services in exchange for your charitable contributions.***



May 21, 2023

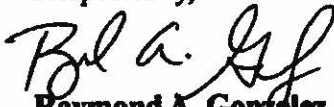
To whom it may concern:

This letter of support is on own my behalf, Raymond A. Gonzalez, Chairman of the Imperial County Veterans Advisory Council, Outgoing American Legion Post 60 Commander, Veterans of Foreign Wars Post 9305 officer, and community leader.

Over the past several years, I have gotten to know Dr. Tien Tan Vo of Vo Medical Center. I've had the pleasure of working alongside Dr. Vo and his team to help the community of Imperial Valley wherever there is a need. One of my first experiences working with Dr. Vo was volunteering to deliver meals to covid-19 positive patients under Vo Neighborhood Medical Clinic in 2020. I believe we had a significantly positive impact on these patients. Another example of Dr. Vo's willingness to step up in a time of need was when the town of Niland, CA experienced a fire that destroyed 40+ homes (also in 2020). Dr. Vo gathered volunteers and paid to have these victims of tragedy fed.

Since then, Dr. Vo has continued to give back in several ways, including but not limited to sponsoring little league, supporting veterans (both monetary and through recognition), providing meals to the homeless, and providing free medical services for underserved populations. There are countless acts of generosity and selflessness that Dr. Vo, Vo Medical Center, and Vo Neighborhood Medical Clinic have made for the benefit of the people of this community. He continues to prove to be a vital asset for the people. We are blessed and lucky to have his leadership and overall support for the needs of Imperial County.

Respectfully,


Raymond A. Gonzalez

Chairman, Imperial County Veterans Advisory Council

760-587-6900 rgon760@yahoo.com



STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0036
(916) 319-2036
FAX (916) 319-2136

DISTRICT OFFICE
48220 JACKSON STREET, SUITE A3
COACHELLA, CA 92236
(760) 347-2360
FAX (760) 347-5704



COMMITTEES
CHAIR UTILITIES AND ENERGY
BUDGET
COMMUNICATIONS AND CONVEYANCE
GOVERNMENTAL ORGANIZATION
HUMAN SERVICES

May 25, 2023

To Whom It May Concern:

As the Assemblymember representing the 36th California State Assembly District, I am writing in support of Dr. Tien Vo. Over the years, our office has fostered a strong partnership with Dr. Vo and his team. We have witnessed his generosity and selflessness to the residents of our district.

Dr. Vo and his wife, Venus, did not hesitate to be at the frontlines of the COVID-19 pandemic. He spearheaded the region's pandemic response by securing mass testing sites in the area. Dr. Vo and his staff continuously mobilize to provide necessary healthcare services to some of our most underserved populations.

Dr. Vo is a trusted medical provider and valuable partner and I look forward to a continued partnership of serving the 36th Assembly District. Should you have any questions regarding my support, do not hesitate to contact me at my Coachella District Office at (760) 347-2360.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eduardo Garcia". The signature is fluid and cursive, written over a light blue horizontal line.

Eduardo Garcia
Assemblymember, 36 AD



To Whom it may Concern,

As the Executive Director of Los Amigos de la Comunidad, Inc, a Community Based Organization serving the underserved and most vulnerable communities of the Imperial Valley and surrounding region I enter this correspondence, if not testimonial, on behalf of Dr Tien Tan Vo for consideration. Dr Vo has been from the inception of his practice in our underserved health disparity region an exception to the norms of our other medical agencies and practices public and private. His practice has given access to the most vulnerable and underserved communities with complete professionalism and the proper care and attention the others have not afforded these groups of community members as needed for various reasons, including lack of competition, lack of resources, lack of proper personnel and at times the lack of the will to truly be servants of the community and most needy.

Dr Vo has transcended the Dr role to the role of the go to health service for our most needy and underserved including being the only Dr to do house visits for the homebound and mobility limited sections of our community who were left alone to deal with their medical issues. He has been a mobile clinic on wheels and setting up clinics in the least visited areas of our community to ensure they have access to services, checkups and ensuring follow-up service. Dr Vo's medical operation is cross regional, cross cultural and competent, compassionate, and accessible and is seen as the beacon and gold standard of medical services for the underserved and most vulnerable. As an organization dedicated to the needs of the underserved Dr Vo has set the standard high for us to emulate and we cherish our working relationship with his services and operation.

Los Amigos de la Comunidad, Inc worked collaboratively with Dr Vo Medical operation during the pandemic and witnessed firsthand the dedication and energy to serve the underserved from Dr Vo and team. Hosting COVID Testing then mass clinics at all hours of the day and night, including early am clinics for farmworkers and homeless where only at that time would they receive the services. We, as an organization, actively asked other medical services to help the farmworker and homeless population in their areas of occupancy at the most obscure hours and places and only Dr Vo Medical Services and operations heard our call and come to help the most vulnerable and underserved. Dr Vo is integral to our community in many ways as a generous benefactor to many causes of the underserved and we support Dr Vo in all endeavors he and his team undertake knowing it will be a benefit for our community.

Respectfully,

A handwritten signature in black ink that reads "Eric M. Reyes". The signature is written in a cursive, flowing style.

Eric Montoya Reyes/Executive Director



Brawley American Citizens Club

P.O. Box 529
Brawley, California 92227

August 28, 2023

U.S. Magistrate
Judge Allison H. Goddard
United States Courthouse
221 W. Broadway
San Diego, CA 92101

Dear; Judge Goddard

Subject: Dr. Tien Tan Vo, Case Number 23cr1700

The Brawley American Citizens' Club on behalf of its Board of Directors and membership are requesting leniency on behalf Dr. Tien Tan Vo, who was convicted for Accessory after the Fact to Entry of Goods by Means of Statement-Title 18 U.S.C. Section 542 and 3.

We met Dr. Vo several years ago and was very impressed by all of his dedication to the Imperial Valley Community. He was the first doctor to come out prepared to test the community for covid while all the other doctors were not available to see patients. Imperial Valley had one of the highest rates for covid19 in California. Dr. Vo saved our community by combatting Covid19. He came to our facility prepared with safety gowns, gloves and masks. While representatives from our Imperial County Board of Supervisor and Hospital Board Directors observed how he conducted his covid testing at our location. Our community lost a lot of loved ones during this pandemic but things would have been worse if it was not for Dr. Vo. He also did house calls, fed his patients who did not have any family members available. He helped the homeless and people with no insurance who needed assistants. He continues to sponsor the unprivileged children and families during Christmas and Mothers Day events. He gives free physicals to children and teenagers needing to join sports or in need of vaccinations. He has been an asset to our community. He has been one of the most hard working and caring Dr. we ever met in Imperial County. Dr. Vo is always giving back to the community, assisting and supporting the community during our local events.

This is Dr. Vo first offense and he sincerely regrets his offense and will never repeat them. We believe in him and know him well and humbly request for lenient sentences. He is one of the best Doctors we have in our community. We feel very fortunate to have him in Imperial County as a Physician. Our community will be devastated without him, including his family. If you have any questions and would like more information contact me (760) 791-4328. Thank you for taking the time to read our letter.

Sincerely,


Anthony P. Gallegos
President