

1 TRACY L. WILKISON
 Acting United States Attorney
 2 BRANDON D. FOX
 Assistant United States Attorney
 3 Chief, Criminal Division
 JOSEPH O. JOHNS (Cal. Bar No. 144524)
 4 Assistant United States Attorney
 Environmental and Community Safety Crimes Section
 5 1300 United States Courthouse
 312 North Spring Street
 6 Los Angeles, California 90012
 Telephone: (213) 894-4536
 7 Facsimile: (213) 534-4300
 E-mail: joseph.johns@usdoj.gov

8 Attorneys for Plaintiff
 9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT
 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 HEMATOLOGY ONCOLOGY
 16 CONSULTANTS, a California
 General Partnership,
 17 MARK GOLDSTEIN, and
 STANLEY ROSSMAN,

18 Defendants.
 19

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

GOVERNMENT'S REQUEST FOR ISSUANCE
OF SUMMONS ON INFORMATION;
DECLARATION OF AUSA JOSEPH O.
JOHNS; [PROPOSED] ORDER

20 Pursuant to Fed. R. Crim. P. 9(a), plaintiff, United States of
 21 America, by and through its counsel of record, the Acting United
 22 States Attorney for the Central District of California, hereby
 23 requests that three summons be issued for each of the named
 24 defendants in the above-entitled matter, based on the probable cause
 25 showing in the accompanying declaration of Assistant United States
 26 Attorney Joseph O. Johns.

27 //

28 //

1 The accompanying declaration is submitted in lieu of an
2 affidavit, pursuant to 28 U.S.C. § 1746.

3 Dated: February 11, 2021

Respectfully submitted,

4 TRACY L. WILKISON
Acting United States Attorney

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

8 /s/
JOSEPH O. JOHNS
9 Assistant United States Attorney

10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DECLARATION OF JOSEPH O. JOHNS

I, Joseph O. Johns, declare and state as follows:

1. I am an Assistant United States Attorney for the Central District of California and am assigned to the prosecution of United States v. Hematology Oncology Consultants, G.P., Mark Goldstein, and Stanley Rossman, CR No. 2:21-cr-00026 -SVW.

2. I have negotiated plea agreements with defendants Hematology Oncology Consultants, G.P., Mark Goldstein, and Stanley Rossman and their respective defense attorneys in this matter. A fully executed copy of each of the three plea agreements is being filed concurrently with the information. The plea agreements contain admissions by each named defendant that he or it is guilty of the offenses charged in the information and a factual basis to support each defendant's plea of guilty. Based on each defendant's admission and associated factual basis, I submit that there is probable cause to believe that each defendant committed the offenses charged against them.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on February 11, 2021.

/s/ Joseph O. Johns 2/11/21

JOSEPH O. JOHNS
Assistant United States Attorney