

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORRYIAN (01)
a.k.a. JAMES NORRYIAN
DEHSHID NOURIAN (02)
a.k.a. DAVID NOURIAN
CHRISTOPHER RYDBERG (03)
ASHRAF MOFID (04)
a.k.a. SHERRI MOFID
LEYLA NOURIAN (05)
MICHAEL TABA (07)

CRIMINAL NO. 3:17-cr-155-L

THE UNITED STATES OF AMERICA'S WITNESS LIST

Pursuant to the Court's order on October 23, 2020 (Dkt. No. 289), the United States, by and through its undersigned counsel, files this Witness List in advance of the October 18, 2022 trial.

Witness	Subject Matter of Testimony	Status
Mahtab Abghari	Ms. Abghari was an employee of the pharmacies. She will testify about working in the pharmacies including ownership, procedures, and profit. Ms. Abghari is also a pharmacist and will testify as to her knowledge in this field.	Probable
Jo Adkins-Grisby	Ms. Adkins-Grisby is a DOL claimant. Ms. Adkins-Grisby will testify about her physical condition, her treatment by defendant Michael Taba and the prescriptions she received for compound medications.	Probable

Nicolas Aguilar	Mr. Aguilar is a physician's assistant and associate of Jamshid Noryian and Dehshid Nourian. He will testify about prescriptions he wrote for employees of the Ability Pharmacy.	Probable
Jamie Allen (formerly Diaz)	Ms. Allen is an accountant. She will testify about her work preparing and filing the compound pharmacies' 2015 corporate tax returns and her meeting with Jamshid Noryian in person.	Probable
Matt Arber	Mr. Arber is an employee of Churchill Management Group. He will testify about the prospective accounts he worked on for the defendants and his interactions with the defendants.	Probable
Amber Sepulveda (formerly Bass)	Ms. Bass was an employee for Dr. Leslie Benson. She will testify about the management structure, services provided, and practices at Dr. Leslie Benson's clinics. Ms. Bass will also testify about her interactions with staff from the compound pharmacies.	Probable
Linda Burks	Ms. Burks is a DOL claimant. Ms. Burks will testify about her physical condition, her treatment by defendant Michael Taba and the prescriptions she received for compound medications.	Probable
Mark Burrell	Mr. Burrell is an Investigative Analyst Specialist with United States Postal Service-Office of the Inspector General. He will testify about the financial records he analyzed and summarized.	Probable
Jeff Byrum	Mr. Byrum is an employee of Ameritrade. He will testify about the accounts he worked on for the defendants and an audio recording of a telephone call he conducted with defendant Deshid Nourian.	Probable

Mary Carpenter (formerly Mitchell)	Ms. Carpenter is a DOL claimant. Ms. Carpenter will testify about her physical condition, her treatment by Dr. Leslie Benson and the prescriptions she received for compound medications.	Probable
Rhonda Clark	Ms. Clark is a DOL claimant. Ms. Clark will testify about her physical condition, her treatment by defendant Michael Taba and the prescriptions she received for compound medications.	Probable
Randy Conner	Mr. Conner is the Chief Executive Officer of Churchill Management Group, a wealth management firm. Mr. Conner will testify about the prospective accounts he worked on for the defendants and his interactions with defendant Jamshid Noryian.	Probable/ Records Custodian
Elliot Cook	Mr. Cook, Chief Pharmacist for the Department of Labor (DOL) Office of Workers' Compensation Program (OWCP), will testify about the OWCP program generally; the laws and regulations governing OWCP coverage of prescription medications; and OWCP claim submission and processing. Mr. Cook also will testify about DOL claims data related to the defendants that he analyzed and summarized.	Probable/ Records Custodian
Melissa Driver (formerly St. Clair)	Ms. Driver is a former employee of defendant Michael Taba. She will testify about her experience working with defendant Michael Taba and employees of the compound pharmacies in this case.	Probable
John Duckworth	Mr. Duckworth is a Computer Crimes Forensic Analyst with United States Postal Service-Office of the Inspector General. He will testify about his receipt and extraction of electronic information obtained after a search of the pharmacies.	Probable

Angela Ertle	Angela Ertle, Special Agent, United States Postal Service-Office of the Inspector General, will testify about statements made to her by defendant Michael Taba during a pre-indictment interview.	Probable
Amoret Guadian	Ms. Guadian is a former employee of the compound pharmacies. She will testify about her experience working for the pharmacies, visiting doctors' offices, obtaining prescriptions, and interacting with DOL claimants. Ms. Guadian is also a beneficiary of the compound pharmacies' Blue Cross Blue Shield employee health care plan who had prescriptions filled by the pharmacies.	Probable
Jared Haggard	Mr. Haggard is a former employee of TD Ameritrade. He will testify about the accounts he worked on for the defendants and an audio recording of a telephone call he conducted with defendant Jamshid Noryian.	Probable
Roman Hernandez	Mr. Hernandez is an Internal Revenue Service Court Witness Coordinator. He will testify that the IRS Tax Returns and Transcripts are official sealed copies.	Probable
Marjaneh Hedayat	Dr. Hedayat is a family medicine physician. She will testify about her prior dating relationship with defendant Jamshid Noryian, his offer to pay her in exchange for sending prescriptions to the pharmacies, her knowledge of defendant Jamshid Noryian's and defendant Michael Taba's relationship, and her interactions with the Noryian family members.	Probable
LaTisha R. Hough	Ms. Hough, Legal Process Manager and Paralegal for TD Ameritrade will testify as a records custodian for documents provided by TD Ameritrade.	Records Custodian

Mohammed Imtiyazuddin	Mr. Imityazuddin is an accountant. He will testify about the tax work he completed in preparing 2015 and 2016 corporate tax returns for the compound pharmacies.	Probable
Robbie Jossa	Mr. Jossa was a marketer for the pharmacies. He will testify about his arrangement with the pharmacies, interactions with the owners and employees of the pharmacies, and his interactions with defendants Dehshid Nourian and Chris Rydberg.	Probable
Hamid Latifi	Dr. Latifi is a former investor of two of defendant Jamshid Noryian's properties including "HJLM." He will testify about his business and investment relationship with defendant Jamshid Noryian.	Probable
Adam Little	Mr. Little is an Internal Revenue Service Revenue Agent. He will testify to the tax records he analyzed and summarized as well as the unreported income and tax loss amount.	Probable
Mitchell Scott	Mr. Scott, Senior Director Special Investigations Unit & Audit, Prime Therapeutics (Blue Cross & Blue Shield), will testify about the BCBS prescription medication program generally; the laws and regulations governing coverage of prescription medications; and the BCBS claim submission and processing. Mr. Scott will also testify about BCBS claims data related to the defendants and his analysis and summary of that data.	Probable/ Records Custodian
Emma Manov	Ms. Manov is an accountant. She will testify about her work preparing and filing defendant Deshid Nourian's 2015 and 2016 personal tax returns and her meeting with Deshid Nourian in person.	Probable

Megan Marines	Ms. Marines is a former employee of the compound pharmacies. She will testify about her experience working for the pharmacies, visiting doctors' offices, obtaining prescriptions, and interacting with DOL claimants. Ms. Marines also is a beneficiary of the compound pharmacies' Blue Cross Blue Shield employee health care plan who had prescriptions filled by the pharmacies.	Probable
Kimberly Necessary (formerly McCoy)	Ms. Necessary is a former employee of Jamshid Noryian and she will testify about her experience working for him and the compound pharmacies. Ms. McCoy also is a beneficiary of the compound pharmacies' Blue Cross Blue Shield employee health care plan who had prescriptions filled by the pharmacies.	Probable
Thomas McJunkins	Mr. Junkins was a marketer for the compound pharmacies. He will testify about his arrangement with the pharmacies and interactions with the owners and employees of the pharmacies.	Probable
Reynaldo Moreno	Mr. Moreno is a former pharmacist of the compound pharmacies. He will testify about his experience working for the pharmacies, filling prescriptions, and interacting with DOL claimants. Mr. Moreno also is a beneficiary of the compound pharmacies' Blue Cross Blue Shield employee health care plan who had prescriptions filled by the pharmacies.	Probable
Latosha Morgan	Latosha Morgan, an office manager at the Fort Worth clinic, will testify about the management structure, services provided, and practices at the clinics. Ms. Morgan will also testify about her interactions with staff from the compound pharmacies.	Probable
Melissa Petitt (aka Pierce)	Melissa Petitt is a former employee of Dr. Leslie Benson. She will testify about the management structure, services provided, practices at the clinics, and knowledge of the pharmacies' staff and practices.	Probable

Kristina Picard (formerly Franks)	Kristina Picard, Special Agent with the U.S. Department of Labor, Office of Inspector General, will testify about the investigation of the case. The government may seek to qualify Kristina Picard as a summary witness.	Probable
Manuel Rodriguez	Manuel Rodriguez, Special Agent with U.S. Postal Service, Office of the Inspector General. He will testify about statements made to him by defendant James Noryian following the execution of a search warrant at 401 College Ave., Fort Worth, TX.	Probable
Laraine Scully	Ms. Scully is a DOL claimant. Ms. Scully will testify about her physical condition, her treatment by Dr. Leslie Benson and the prescriptions she received for compound medications.	Probable
Dr. Stephen Thomas	Dr. Thomas will testify, as an expert, about the patient files he reviewed and provide his expert opinion as to the validity of the prescriptions written by Dr. Leslie Benson and defendant Michael Taba and filled by the pharmacies.	Expert
Jennifer Thomas	Ms. Thomas is the custodian of records for CVS Caremark. She will testify regarding the business records maintained by CVS Caremark related to the defendants.	Records Custodian
Robert Van Gieson	Mr. Van Gieson is a former employee of Jamshid Noryian. He will testify about his experience working for Jamshid Noryian and the work he managed that was done on defendant Michael Taba's businesses and homes by Jamshid Noryian.	Probable
Chris Waites	Mr. Waites is a UPS Store employee. He will testify about this work experience at the UPS Store located at 5729 Lebanon Road, Frisco, TX 75034 and his interactions with defendant Leyla Nourian at that UPS Store location.	Probable

Kevin Williams	Kevin Williams is a former physician who accepted payments from the pharmacies and Jamshid Noryian in exchange for sending prescriptions to the pharmacies. He will testify about the payments he received and his interactions with his codefendants.	Probable
James Wilson	Mr. Wilson is Reporting and Analytic Consultant for Blue Cross & Blue Shield and will testify as the records custodian for the claims data provided by Blue Cross & Blue Shield.	Records Custodian
Financial Records Custodians	Pending the outcome of the Government's motion <i>in limine</i> to authenticate evidence pursuant to Federal Rule of Evidence 902, records custodians may testify as to the business records predicate should the defendants object to any business records affidavits for the Government's exhibits.	Records Custodians

(continued on the next page)

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

GLENN S. LEON
CHIEF, FRAUD SECTION

/s/ *Ethan Womble*

ETHAN WOMBLE
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
Texas Bar No. 24102757
(202) 674-5653
ethan.womble@usdoj.gov

CARLOS A. LÓPEZ
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
New York Bar No. 4256244
(202) 875-9038
carlos.lopez@usdoj.gov

KELLY LYONS
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
New York Bar No. 5429113
(202) 923-6451
kelly.m.lyons@usdoj.gov