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CENTRAL DISTRICT OF CALIFORNIA
BY: eva DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JENNIFER MARIE EDWARDS,
aka "Juice Lady" and
"120 Lady,"

Defendant.

No. 8:21-cr-00067-CJC

I N F O R M A T I O N

[21 U.S.C. § 846: Conspiracy to Distribute and to Possess with Intent to Distribute Oxycodone]

The Acting United States Attorney charges:

[21 U.S.C. § 846]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Oxycodone was the generic name for a highly addictive prescription analgesic which was classified as a Schedule II controlled substance, meaning that it had a high potential for abuse, the drug had an accepted medical use with severe restrictions, and abuse of the drug or other substances could lead to severe psychological or physical dependence. The highest dose of short-acting oxycodone available, and the dose most popular for the drug abusing population, was the 30 milligram ("30mg") tablet.

2. "Cappers" were individuals who recruited indigent, drug-addicted, or otherwise vulnerable individuals (the "sham patients" or "capper-controlled patients") to obtain prescriptions for oxycodone from medical clinics. Sham patients who obtained prescriptions did not have a legitimate medical need for oxycodone and intended to sell oxycodone obtained pursuant to the prescriptions (the "fraudulent oxycodone prescriptions") on the black market.

3. ChiroMed was a group of chiropractic, medical, and wellness clinics in Los Angeles, Orange, and San Bernardino Counties. ChiroMed provided pain management services at medical clinics in Santa Ana, Fontana, Huntington Park, Redondo Beach, and Inglewood, among other clinics.

B. OBJECTS OF THE CONSPIRACY

4. Beginning in or around October 2018, and continuing to at least in or around May 2019, in Los Angeles, Orange, and Riverside Counties, within the Central District of California, and elsewhere, defendant JENNIFER MARIE EDWARDS, also known as "Juice Lady" and "120 Lady," Justin Douglas Cozart, Damoon Joe Navarchi, John Michael Korzelius, Mayra Barrios, Maricela Barrios, Lashirley Marie Price, Xavier Mabale, and others conspired with each other to knowingly and intentionally distribute oxycodone, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

C. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

5. The objects of the conspiracy were to be accomplished, in substance, as follows:

a. Cozart and Navarchi would operate medical clinics in Los Angeles, Orange, and Riverside Counties, in part for the purpose of profiting from the sale of fraudulent oxycodone prescriptions.

b. Mayra Barrios, under the supervision of Cozart and Navarchi, would oversee the day-to-day management of the medical clinics, including the issuance of fraudulent oxycodone prescriptions to sham patients.

c. Cozart would retain corrupt doctors and physician assistants to write fraudulent oxycodone prescriptions in exchange for cash payments.

d. Price, Xavier Mabale, and other cappers (including co-conspirators "Capper-2" and "Capper-3") would recruit sham patients to obtain fraudulent oxycodone prescriptions from the medical clinics.

e. Maricela Barrios would schedule appointments for sham patients, obtain vital signs of sham patients before the sham patients met with a medical professional, and collect cash payment from Price, Mabale, and other cappers.

f. Korzelius and other licensed physicians (including co-conspirator "Doctor-1"), while acting and intending to act outside the usual course of professional practice and without a legitimate medical purpose, would meet with fraudulent patients and provide them with prescriptions for oxycodone, among other drugs.

g. Defendant EDWARDS and other licensed physician assistants, while acting and intending to act outside the usual course of professional practice and without a legitimate medical purpose, and without supervision or direction from any licensed

physician including Korzelius, would meet with fraudulent patients and provide them with prescriptions for oxycodone, among other drugs.

D. OVERT ACTS

6. In furtherance of the conspiracy, and to accomplish the object of the conspiracy, on or about the following dates, defendant EDWARDS, and others known and unknown to the Acting United States Attorney, committed various overt acts within the Central District of California, and elsewhere, including, but not limited to, the following:

Overt Act No. 1: On or about November 20, 2018, in a telephone call using coded language, Price told Cozart that Doctor-1 would not verify the legitimacy of fraudulent oxycodone prescriptions when called by pharmacies, and for that reason, Price preferred for defendant EDWARDS to write fraudulent oxycodone prescriptions for Price's sham patients. Cozart instructed Price to take her sham patients to the Redondo Beach Clinic because defendant EDWARDS would be there and Price's patients would have priority. Cozart also told Price that Doctor-1 was paid an incentive based on the volume of prescriptions written.

Overt Act No. 2: On or about November 20, 2018, in a telephone call using coded language, Navarchi confirmed that Doctor-1 was writing fraudulent oxycodone prescriptions that day, not defendant EDWARDS. Cozart instructed Navarchi to pay defendant EDWARDS $500 or $600 in cash and "send her out."

Overt Act No. 3: On or about November 26, 2018, in a telephone call using coded language, Cozart told defendant EDWARDS that she should "just see pain patients" whenever she wanted at the Redondo Clinic because Doctor-1 was "greedy" and wanted the

Huntington Park Clinic "all to himself." Cozart advised defendant EDWARDS that she should not prescribe 120 or more oxycodone pills in a single prescription because Cozart did not "want somebody coming in to us and say[ing] we're over-utilizing opioids." Cozart said the other reasons not to prescribe 120 oxycodone pills in one fraudulent prescription was because "these people, these patients, they start running their mouth. And then they're going to say, 'Yeah, she wrote me 120.' And then you got all these jackasses coming to you [saying] 'Oh, no, increase mine.'" Defendant EDWARDS asked whether the rule applied "regardless of the marketer" who brought the patient. Cozart responded that defendant EDWARDS had to "be careful. Make sure it's all documented. There has to be, you know, [a] significant reason why they would get that."

Overt Act No. 4: On or about November 27, 2018, in a telephone call using coded language, Cozart told Navarchi that Price had obtained defendant EDWARDS's telephone number and was requesting that defendant EDWARDS write prescriptions "on the side." Cozart said that, according to Capper-2, Price had gone to prison for three years "for doing this shit." Cozart further observed that Price's association with the medical clinics would bring unneeded attention to them.

Overt Act No. 5: On or about November 28, 2018, in a telephone call using coded language, Cozart and Navarchi discussed the text message Mayra Barrios had received from Capper-3. Cozart said Capper-3 has been complaining about Korzelius's fraudulent oxycodone prescriptions "for a while." Navarchi said they should stop seeing Capper-3's sham patients if Capper-3 was not "on board" and was not "savvy enough with the script." Cozart suggested that

Capper-3 should talk to Mabale because Mabale did not have problems filling fraudulent oxycodone prescriptions, and that maybe Capper-3 needs to "work under" Mabale. Cozart and Navarchi also discussed fraudulent oxycodone prescriptions for 120 oxycodone pills written by defendant EDWARDS. Although those patients claimed to have had "terminal cancer," Navarchi said "[t]here's no paperwork in the file. I looked in the files. Like, they need to have some kind of bloodwork. Some kind of documentation. Cuz if they, if, God forbid, someone audits us . . . But the patient just told the doctor [about the terminal cancer diagnosis.] I mean, you know? I can say I have cancer too." Cozart and Navarchi agreed that all sham patients lie about their maladies.

Overt Act No. 6: On or about December 6, 2018, in a telephone call using coded language, Cozart and Navarchi discussed the need to monitor defendant EDWARDS's files and charts so that her fraudulent oxycodone prescriptions would not raise suspicions about Doctor-1, which could cause Cozart and Navarchi to close down the medical clinics. Navarchi informed Cozart that defendant EDWARDS was referred to on the streets as the "juice lady" or the "120 lady," referring to, respectively, promethazine with codeine cough syrup and oxycodone.

Overt Act No. 7: On or about December 21, 2018, in a telephone call using coded language, Cozart instructed defendant EDWARDS to cease communication with Price and Capper-2 in order to protect herself. According to Cozart, people like Price and Capper-2 were "supposed to be ghosts" who were "not even supposed to be in the equation." Cozart also explained that he wanted to "tighten up"

protocols including restricting "our doctors" from "communicat[ing] with the patients or the marketers."

Overt Act No. 8: On or about January 17, 2019, in a telephone call, Cozart told Navarchi that defendant EDWARDS should not be given any cash because she was always paid by check. Cozart and Navarchi agreed to pay defendant EDWARDS $1,000 for her services that day.

Overt Act No. 9: On or about January 21, 2019, in a text message using coded language, Price sent the name of a sham patient to defendant EDWARDS and wrote underneath "oxc and juice," referring to promethazine with codeine cough syrup and oxycodone, respectively.

Overt Act No. 10: On or about January 24, 2019, in a telephone call using coded language, Cozart advised defendant EDWARDS that Price planned to bring ten to fifteen sham patients to a clinic to obtain fraudulent oxycodone prescriptions the next day. Cozart said that defendant EDWARDS did not have to see the patients but could just write the refills.

Overt Act No. 11: On or about February 5, 2019, in a telephone call using coded language, Cozart informed defendant EDWARDS that she would be providing patients pain injections in the future. Cozart said pain injections would "look[] good for the file" and that it would not appear as if defendant EDWARDS prescribed only oxycodone to patients.

Overt Act No. 12: On or about February 6, 2019, in a telephone call using coded language, Cozart and Navarchi discussed a report that Doctor-1 had advised a pharmacy that he did not know defendant EDWARDS, who was writing fraudulent oxycodone prescriptions under Doctor-1's name. Cozart told Navarchi that Doctor-1 had never met defendant EDWARDS. On or about February 6, 2019, in a telephone

call, Cozart told Korzelius that Korzelius needed to meet defendant EDWARDS.

Overt Act No. 13: On or about February 7, 2019, in a text message using coded language, Price wrote in a text message to defendant EDWARDS, "oxy," followed by five sham patient names and birth dates, and "norco/juice," followed by two sham patient names.

Overt Act No. 14: On or about February 8, 2019, in a telephone call using coded language, Cozart discussed with Price the pharmacies that filled fraudulent oxycodone prescriptions Price had obtained using sham patients. Cozart explained to Price that Cozart did not want pharmacies to call doctors associated with the medical clinics. Price informed Cozart that there were no questions asked of Price when Price dropped off fraudulent oxycodone prescriptions. Price informed Cozart that Price had asked defendant EDWARDS to prescribe different medications alongside oxycodone.

Overt Act No. 15: On or about February 26, 2019, in a text message using coded language, Price wrote to defendant EDWARDS,

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"Mommy I need for Oxys 120 in the last one or Norco in a juice and I have the package for you now so I can send me and there to get it."

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