

INDEX

VITAL IMAGING PARTNERS, INC& SAM SOLAKYAN

| Exhibit # | Document | File Date |
|------------------|---|------------------|
| | USA v Sam Sarkis Solakyan (Case no. 18 CR 4163 BAS) | 9/25/2018 |
| 1 | CA Secretary of State: Statement of Information: Vital Imaging Partners, Inc. | 8/19/2015 |
| 2 | CA Secretary of State: Statement of Information: Vital Imaging Partners, Inc. | 5/18/2017 |
| 3 | CA Secretary of State: Certificate of Dissolution: Vital Imaging Partners, Inc. | 6/19/2018 |

~~SEALED~~

9/27/18 *af*

UNSEALED PER ORDER OF COURT

FILED

18 SEP 25 PM 3:12

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

VRC

DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

April 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAM SARKIS SOLAKYAN,

Defendant.

Case No. _____

I N D I C T M E N T

Title 18, U.S.C., Sec. 1349 -
Conspiracy to Commit Honest
Services Mail Fraud and Health Care
Fraud; Title 18, U.S.C., Secs. 1341
and 1346 - Honest Services Mail
Fraud; Title 18, U.S.C., Sec. 2 -
Aiding and Abetting; Title 18,
U.S.C., Sec. 981(a)(1)(C), and
Title 28, U.S.C., Sec. 2461(c) -
Criminal Forfeiture

The grand jury charges, at all times relevant:

INTRODUCTORY ALLEGATIONS

DEFENDANT AND OTHER PARTICIPANTS

1. Defendant SAM SARKIS SOLAKYAN ("SOLAKYAN") was the President, Chief Executive Officer, Secretary, Chief Financial Officer, and only director of record of Vital Imaging, Inc., with a primary business address in Glendale, California. He was also the President, CEO, CFO, and a director of San Diego MRI Institute, which had an address of record in Burbank, California, but provided services to patients at a location on Ruffin Road in San Diego. Defendant was the Chairman of the Board and Secretary of Global Holdings, LLC and Empire Radiology, LLC, both of which reported a primary business address in Glendale, California.

VHC:CPH:FAS(1):nlv:San Diego
9/25/18

1 RMC

cc: Pretti

1 In addition, defendant owned and controlled other companies, including
2 Access Integrated Healthcare, LLC, d.b.a AIH Imaging; Access Imaging,
3 LLC; Paramount Management Services, LLC; and Capital Edge Holdings, LLC
4 (all together, "Solakyan's Companies"). Through Solakyan's Companies,
5 defendant operated diagnostic screening facilities that, among other
6 services, conducted Magnetic Resonance Imaging ("MRI") scans. Defendant
7 operated diagnostic imaging facilities throughout California, including
8 in Richmond, Hayward, San Jose, Garden Grove, Anaheim, Burbank, and
9 San Diego.

10 2. Dr. Steven Rigler (charged elsewhere) was a chiropractor
11 licensed to practice in California, who operated three clinics in the
12 Southern District of California specializing in chiropractic medicine.

13 3. Alexander Martinez (charged elsewhere) managed Dr. Rigler's
14 clinics, first in Calexico, then also in San Diego and Escondido, and,
15 in that capacity, controlled (on Dr. Rigler's behalf) the referral of
16 patients to ancillary service providers.

17 4. Fermin Iglesias and Carlos Arguello (both charged elsewhere)
18 recruited injured workers to seek Workers' Compensation benefits in the
19 state of California. Iglesias and Arguello controlled and operated
20 multiple entities, including Providence Scheduling, Inc., MedEx
21 Solutions, Inc., Meridian Medical Resources, Inc. d.b.a. Meridian Rehab
22 Care, and Prime Holdings, Int., Inc.

23 **PHYSICIANS' DUTY TO THEIR PATIENTS**

24 5. Physicians, including doctors, surgeons, and chiropractors,
25 owed a fiduciary duty to their patients. This duty required that
26 physicians act in their patients' best interests, and not for their own
27 professional, pecuniary, or personal gain. Under California law, a
28 physician had a fiduciary duty to disclose all information material to

1 the patient's decision when soliciting a patient's consent to a medical
2 procedure; such information included personal interests unrelated to the
3 patient's health, whether research or economic, that might affect the
4 physician's professional judgment. Accepting kickbacks, bribes, and
5 referral fees without the patient's consent was a breach of a physician's
6 fiduciary duty to his patient.

7 **CALIFORNIA WORKERS' COMPENSATION SYSTEM**

8 6. The California Workers' Compensation System ("CWCS") required
9 employers in California to provide Workers' Compensation benefits to
10 employees for qualifying injuries sustained in the course of employment.
11 Under the CWCS, all claims for payments for services or benefits provided
12 to the injured employee, including medical and legal fees, were billed
13 directly to, and were paid by, the insurer. If the insurer did not pay,
14 the provider could file a lien against the employee's Workers'
15 Compensation claim, which accrued interest until paid in an amount
16 ordered by the Workers' Compensation Appeals Board ("WCAB") or as
17 negotiated between the insurer and the provider.

18 7. The CWCS required claims administrators to authorize and pay
19 for medical care that was "reasonably required to cure or relieve the
20 injured worker from the effects of his or her injury," and included
21 medical, surgical, chiropractic, acupuncture, and hospital treatment.

22 8. The CWCS and private and public CWCS insurers were "health
23 care benefit programs" under Title 18, United States Code, Section 24,
24 that is, a public or private plan or contract, affecting commerce, under
25 which any medical benefit, item, or service was provided to an
26 individual, and any individual or entity who provided a medical benefit,
27 item or service for which payment may be made under the plan or contract.

28

1 9. Effective January 1, 2012, California Labor Code Section 139.3
2 made it a crime for a physician to refer Workers' Compensation patients
3 for a variety of medical goods and services, including diagnostic imaging
4 services and pharmacy goods, to an entity in which that physician had a
5 financial interest. A financial interest included any remuneration,
6 rebate, subsidy, or other form of direct or indirect payment.

7 10. According to California Labor Code Section 3209.3, the term
8 "physician" in the Labor Code included physicians and surgeons holding
9 an M.D. or D.O. degree, psychologists, acupuncturists, optometrists,
10 dentists, podiatrists, and chiropractic practitioners licensed by
11 California state law and within the scope of their practice as defined
12 by California state law.

13 Count 1

14 **CONSPIRACY TO COMMIT HONEST SERVICES MAIL FRAUD AND HEALTH CARE FRAUD**
15 **18 U.S.C. § 1349**

16 11. Paragraphs 1 through 10 of this Indictment are realleged and
17 incorporated by reference.

18 12. Beginning on a date unknown no later than mid-2013, and
19 continuing through at least November 2016, within the Southern District
20 of California and elsewhere, defendant SAM SARKIS SOLAKYAN intentionally
21 conspired with Dr. Steven Rigler, Fermin Iglesias, Providence
22 Scheduling, Medex Solutions, Carlos Arguello, Alexander Martinez, and
23 others to:

24 a. commit Honest Services Mail Fraud, that is, to knowingly
25 and with the intent to defraud, devise and participate in a material
26 scheme to defraud and to deprive patients of the intangible right to
27 their physicians' honest services, and for the purpose of executing such
28 scheme, mail and cause to be mailed via the U.S. Postal Service any

1 matter and thing, in violation of Title 18, United States Code,
2 Sections 1341 and 1346; and

3 b. commit Health Care Fraud, that is, to knowingly and with
4 the intent to defraud, devise and participate in a material scheme to
5 defraud a health care benefit program, and to obtain money and property
6 owned by, and under the custody and control of, a health care benefit
7 program, by means of false and fraudulent pretenses, representations,
8 and promises, in violation of Title 18, United States Code, Section 1347.

9 **FRAUDULENT PURPOSE**

10 13. It was the goal of the conspiracy for defendant to fraudulently
11 obtain money from health care benefit programs for services provided to
12 Workers' Compensation patients that defendant procured by paying bribes
13 and kickbacks to the referring physicians.

14 **MANNER AND MEANS**

15 14. The conspirators used the following manner and means, among
16 others, in pursuit of their fraudulent purpose:

17 a. It was a part of the conspiracy that defendant and his
18 conspirators offered to pay, and paid, compensation to physicians (and
19 those acting on their behalf) to refer Workers' Compensation patients
20 to Solakyan's Companies for MRI and other services.

21 b. It was a further part of the conspiracy that the
22 compensation the co-conspirators offered to physicians in exchange for
23 their referrals consisted of either a steady supply of new patients (the
24 "cross-referral" method), or direct payments ("cash" method).

25 c. It was a further part of the conspiracy that the co-
26 conspirators obscured the true nature of their financial relationships
27 in order to conceal their corrupt kickback and bribery scheme, including
28 by entering into various sham agreements such as contracts for

1 "marketing," "administrative services," and "scheduling," when in
2 reality the money paid by defendant amounted to volume-based, per-scan
3 bribes and kickbacks to induce physicians to refer patients to Solakyan's
4 Companies.

5 d. It was a further part of the conspiracy that, as part of
6 the cross-referral method, Iglesias and Arguello required physicians to
7 refer patients for a minimum number of ancillary medical services and
8 goods in order for the conspirators to send new patients to the
9 physician.

10 e. It was a further part of the conspiracy that if the
11 physician failed to meet the minimum quota, co-conspirators Iglesias and
12 Arguello stopped referring new patients to that physician,
13 notwithstanding any "marketing" or other agreement they had entered into
14 on paper to justify the referral of new patients to that physician.

15 f. It was a further part of the conspiracy that, over the
16 course of their scheme, defendant, using bank accounts in the names of
17 Global Holdings and Empire Radiology, paid Iglesias and Arguello,
18 through their company MedEx, over \$8.8 million to obtain MRI referrals
19 from physicians compensated by Iglesias and Arguello.

20 g. It was a further part of the conspiracy that defendant
21 also paid physicians, including Dr. Rigler, cash for each MRI scan
22 referred to Solakyan's Companies.

23 h. It was a further part of the conspiracy that defendant
24 paid a fee for each scan that the physician referred, thereby creating
25 an incentive for the physician to recommend more scans than necessary
26 for the patient.

27 i. It was a further part of the conspiracy that defendant
28 caused MRI scans to be conducted at San Diego MRI Institute, located at

1 5395 Ruffin Road, Suite 100, in San Diego, to serve patients referred
2 by San Diego physicians, including Dr. Rigler.

3 j. It was a further part of the conspiracy that defendant's
4 companies, including San Diego MRI Institute and Vital Imaging, sent via
5 U.S. mail, claims for reimbursement to CWCS insurers, for services
6 provided to patients whose referrals had been procured through unlawful
7 kickbacks and bribes to the referring physician.

8 k. It was a further part of the conspiracy that the co-
9 conspirators concealed from patients, and intended to cause the
10 physicians to conceal from patients, the bribe and kickback payments,
11 in violation of those physicians' fiduciary duties to their patients and
12 in violation of California law.

13 l. It was a further part of the conspiracy that the co-
14 conspirators concealed from insurers, and intended to cause the
15 physicians to conceal from insurers, the bribe and kickback payments,
16 which would have rendered the claims for reimbursement unpayable under
17 California law.

18 m. It was a further part of the conspiracy that defendant
19 and his co-conspirators knew and intended that the referring physicians,
20 including Dr. Rigler, would submit false statements to health care
21 benefit programs, including certifications of compliance with California
22 Labor Code Section 139.3, that is, that the physician had no financial
23 interest in the entity that received the referral, when in reality
24 defendant and his co-conspirators were compensating the physicians via
25 the cross-referral and cash methods.

26 n. It was a further part of the conspiracy that defendant
27 filed liens, and intended to file liens, through Solakyan's Companies,

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1 to collect payment on claims for ancillary medical services procured
2 through the payment of bribes and kickbacks.

3 o. It was a further part of the conspiracy that defendant
4 submitted and caused to be submitted over \$284 million in claims for
5 ancillary medical services procured through the payment of bribes and
6 kickbacks.

7 **OVERT ACTS**

8 15. In furtherance of the conspiracy and in order to effect the
9 objects thereof, defendant and others committed or caused the commission
10 of the following overt acts within the Southern District of California
11 and elsewhere:

12 a. In late 2011 or early 2012, defendant agreed with
13 Iglesias and Arguello that defendant would pay Iglesias and Arguello for
14 each scan referred by MedEx and completed by one of Solakyan's Companies,
15 knowing and intending that Iglesias and Arguello would obtain the
16 patients by paying bribes and kickbacks to the referring physicians.

17 a. On or about January 1, 2012, defendant, through his
18 company Global Holdings, Inc., and Iglesias, on behalf of Medex, entered
19 into a "Scheduling Services Agreement," which supposedly required Medex
20 to schedule patients and collect paperwork from referring physicians,
21 at a rate of \$200.00 per patient.

22 b. In or about August 2013, Iglesias, Arguello, and Julian
23 Garcia (charged elsewhere) agreed to send Workers' Compensation patients
24 to Dr. Rigler's San Diego and Escondido clinics if Dr. Rigler, in turn,
25 referred those applicants for a certain quota of ancillary procedures
26 and Durable Medical Equipment ("DME") from providers designated by
27 Iglesias and Arguello, including, for MRI scans, Solakyan's Companies.

1 c. On or about September 10, 2013, defendant issued a check
2 in the amount of \$93,650.00 from an account in the name of one of
3 Solakyan's Companies to Medex Solutions, Inc., to pay for patient
4 referrals.

5 d. On or about October 8, 2013, defendant issued a check in
6 the amount of \$310,500 from an account in the name of one of Solakyan's
7 Companies to Medex Solutions, Inc., to pay for patient referrals.

8 e. On or about November 8, 2013, defendant issued a check
9 in the amount of \$273,300 from an account in the name of one of Solakyan's
10 Companies to Medex Solutions, Inc., to pay for patient referrals.

11 f. On or about December 6, 2013, defendant issued a check
12 in the amount of \$346,800 from an account in the name of one of Solakyan's
13 Companies to Medex Solutions, Inc., to pay for patient referrals.

14 g. On or about January 2, 2014, defendant issued a check in
15 the amount of \$300,000 from an account in the name of one of Solakyan's
16 Companies to Medex Solutions, Inc., to pay for patient referrals.

17 h. On or about January 24, 2014, defendant issued a check
18 in the amount of \$425,650 from an account in the name of one of Solakyan's
19 Companies to Medex Solutions, Inc., to pay for patient referrals.

20 i. On or about March 1, 2014, defendant, through his company
21 Global Holdings, Inc., and Iglesias, on behalf of Medex, entered into a
22 "Outsourced Administrative Services Agreement," which replaced their
23 prior Scheduling Services Agreement, and which required Medex to collect
24 paperwork from physicians, coordinate with insurance companies, and
25 schedule patients, in exchange for \$50 per MRI scan.

26 j. On each of March 13, March 25, and April 8, 2014,
27 defendant issued checks in the amount of \$100,000 from an account in
28

1 the name of one of Solakyan's Companies to Medex Solutions, Inc., to
2 pay for patient referrals.

3 k. On or about July 2, 2014, defendant issued a check in the
4 amount of \$160,000 from an account in the name of one of Solakyan's
5 Companies to Medex Solutions, Inc., to pay for patient referrals.

6 l. On or about July 29, 2014, defendant issued a check in
7 the amount of \$100,000 from an account in the name of one of Solakyan's
8 Companies to Medex Solutions, Inc., to pay for patient referrals.

9 m. On or about October 2, 2014, defendant issued a check in
10 the amount of \$243,200 from an account in the name of one of Solakyan's
11 Companies to Medex Solutions, Inc., to pay for patient referrals.

12 n. On or about October 31, 2014, defendant issued a check
13 in the amount of \$217,800 from an account in the name of one of Solakyan's
14 Companies to Medex Solutions, Inc., to pay for patient referrals.

15 o. On or about December 8, 2014, defendant issued a check
16 in the amount of \$115,950 from an account in the name of one of Solakyan's
17 Companies to Medex Solutions, Inc., to pay for patient referrals.

18 p. On or about January 22, 2015, defendant and Dr. Rigler
19 discussed defendant paying cash directly to Dr. Rigler for patient
20 referrals, in addition to the cross-referral method then in place with
21 MedEx.

22 q. On or about January 22, 2015, while discussing how
23 defendant could compensate Dr. Rigler for patient referrals, defendant
24 acknowledged that MedEx already was compensating Dr. Rigler via the
25 cross-referral method by supplying new patients to Dr. Rigler: "The only
26 thing is, you know, obviously, your case volume, how, how do we
27 reciprocate because you don't have . . . like with Fermin [Iglesias]
28 . . . he has new cases [to offer you]."

1 r. On or about January 22, 2015, defendant proposed paying
2 Dr. Rigler cash for each scan referred to one of Solakyan's Companies:
3 "But we can work something out where, you know, it's about, generally
4 it's about forty bucks, fifty bucks per scan."

5 s. On or about January 22, 2015, defendant proposed the
6 following bribe or kickback fee structure to Dr. Rigler: "[T]his is very
7 cut and dry. It's per scan, per body part . . . three, uh, uh, three
8 body parts per patient. Hundred, one-fifty, I mean everything's just
9 very bam, bam, bam."

10 t. On or about February 10, 2015, defendant advised his
11 executives in an email that, "We should go through each referral source
12 and tag them with in-house contacts as handlers for that account." In
13 the same email, he listed himself as the "handler" for MedEx, the company
14 owned by Iglesias and Arguello.

15 u. On or about February 19, 2015, Alexander Martinez
16 provided to Solakyan's Companies, via a Google doc, patient referrals,
17 including referrals of 2 MRIs for Dr. Rigler's patient Felipe B.

18 v. On or about March 1, 2015, defendant, through his company
19 Global Holdings, Inc., and Iglesias, on behalf of Medex, entered into a
20 new "Outsourced Administrative Services Agreement," which replaced the
21 prior version. Although the services MedEx was to provide were largely
22 the same, this new agreement lowered the payment to \$30 per MRI scan.

23 w. On or about March 18, 2015, defendant issued a check in
24 the amount of \$100,000 from an account in the name of one of Solakyan's
25 Companies to Medex Solutions, Inc., to pay for patient referrals.

26 x. On or about March 20, 2015, defendant and Dr. Rigler
27 discussed the declining reimbursement for MRI scans from insurance

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1 companies, and defendant acknowledged that he was still paying "20 bucks"
2 in "marketing" with "Fermin" for each MRI.

3 y. On or about March 20, 2015, defendant inquired and
4 learned that Iglesias credited \$50 for each MRI scan Dr. Rigler referred
5 against the minimum quota Dr. Rigler was expected to meet for each
6 patient.

7 z. On or about March 20, 2015, defendant reassured Dr.
8 Rigler that his earlier offer was still open, but only for a limited
9 time: "So just so you know, between us, okay, so anything [referred] up
10 until March 1st . . . is still 50 [\$50 per scan]."

11 aa. On or about March 24, 2015, to conceal his cash payments
12 to Dr. Rigler for patient referrals, defendant used "reports" as code
13 for cash in asking Dr. Rigler if he could "send my driver with your
14 reports," then stated, "I'll have him contact you then I'll just send
15 him with your reports, buddy."

16 bb. On or about March 24, 2015, in the same conversation,
17 defendant confirmed the number of scans that Dr. Rigler had referred to
18 defendant's MRI company for which Dr. Rigler would be paid: "So there's
19 a total of 51."

20 cc. On or about March 25, 2015, defendant directed his driver
21 to deliver a sealed envelope to Dr. Rigler containing \$2,600 in \$100
22 bills.

23 dd. On or about March 25, 2015, defendant issued a check in
24 the amount of \$101,650 from an account in the name of one of Solakyan's
25 Companies to Medex Solutions, Inc., to pay for patient referrals.

26 ee. In or about March 2015, defendant submitted or caused to
27 be submitted to insurance companies requests for reimbursement exceeding
28

1 \$150,000, for the 51 MRI scans defendant procured by paying \$2,600 in
2 bribes or kickbacks to Dr. Rigler.

3 ff. On or about July 1, 2015, defendant issued a check in the
4 amount of \$181,162 from an account in the name of one of Solakyan's
5 Companies to Medex Solutions, Inc., to pay for patient referrals.

6 gg. On each of April 22, May 23, June 21, July 20, August 18,
7 September 20, October 20, and November 23, 2016, defendant issued
8 payments in the amount of \$20,000 from an account in the name of one of
9 Solakyan's Companies to Medex Solutions, Inc., to pay for patient
10 referrals.

11 All in violation of Title 18, United States Code, Section 1349.

12 Counts 2-12

13 **HONEST SERVICES MAIL FRAUD**
14 **18 U.S.C. §§ 1341, 1346 & 2**

15 16. Paragraphs 1 through 10 of this Indictment are realleged and
16 incorporated by reference.

17 17. Beginning on a date unknown no later than mid-2013, and
18 continuing through at least November 2016, within the Southern District
19 of California and elsewhere, defendant SAM SARKIS SOLAKYAN, knowingly
20 and with the intent to defraud, devised and participated in a material
21 scheme to defraud, that is, to deprive patients of their intangible
22 right to their physician's honest services.

23 18. Paragraphs 13 through 15 of this Indictment are realleged and
24 incorporated by reference as more fully describing the scheme to defraud,
25 that is, to deprive patients of their intangible right to their
26 physician's honest services.

27 //

28 //

EXECUTIONS OF THE SCHEME TO DEFRAUD

19. On or about the following dates, within the Southern District of California and elsewhere, defendant SAM SARKIS SOLAKYAN, for the purpose of executing the scheme, caused the following mail matter to be placed in a post office and authorized depository for mail matters to be delivered by the United States Postal Service and private and commercial interstate carrier:

| Count | Date | Item Mailed |
|-------|----------------|--|
| 2 | July 23, 2014 | Request for payment totaling \$16,790 for 6 MRI scans for Jose C., sent to Berkshire Hathaway, secured through the payment of a bribe to Dr. Rigler |
| 3 | Sept. 3, 2014 | Request for payment totaling \$1,955 for 1 MRI scan for Jose C., sent to Berkshire Hathaway, secured through the payment of a bribe to Dr. Rigler |
| 4 | Oct. 14, 2014 | Request for payment totaling \$6,440 for 2 MRI scans for Liliana C., sent to ESIS, secured through the payment of a bribe to Dr. Rigler |
| 5 | Oct. 21, 2014 | Request for payment totaling \$5,175 for 2 MRI scans for Jose C., sent to Berkshire Hathaway, secured through the payment of a bribe to Dr. Rigler |
| 6 | March 5, 2015 | Request for payment totaling \$3,220 for 1 MRI scan for Gabriel M., sent to Acclaim Risk Management, secured through the payment of a \$50 bribe to Dr. Rigler |
| 7 | March 6, 2015 | Request for payment totaling \$3,220 for 1 MRI scan for Gabriel M., sent to Acclaim Risk Management, secured through the payment of a \$50 bribe to Dr. Rigler |
| 8 | March 11, 2015 | Request for payment totaling \$16,100 for 5 MRI scans for Refugio L., sent to Zenith, secured through the payment of a \$250 bribe to Dr. Rigler |
| 9 | March 11, 2015 | Request for payment totaling \$8,395 for 3 MRI scans for Virginia P., sent to Sedgwick, secured through the payment of a \$150 bribe to Dr. Rigler |

| Count | Date | Item Mailed |
|-------|----------------|---|
| 10 | March 18, 2015 | Request for payment totaling \$3,220 for 1 MRI scan for Blasa R., sent to Sedgwick, secured through the payment of a \$50 bribe to Dr. Rigler |
| 11 | March 26, 2015 | Request for payment totaling \$6,440 for 2 MRI scans for Felipe B., sent to Gallagher Bassett, secured through the payment of a \$100 bribe to Dr. Rigler |
| 12 | April 3, 2015 | Request for payment totaling \$6,440 for 2 MRI scans for Maria R., sent to York Insurance, secured through the payment of a \$100 bribe to Dr. Rigler |

All in violation of Title 18, United States Code, Sections 1341, 1346 and 2.

CRIMINAL FORFEITURE

20. Paragraphs 1 through 19 of this Indictment are realleged and incorporated as if fully set forth herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

21. Upon conviction of one or more of the offenses of Conspiracy and Honest Services Mail Fraud as alleged in Counts 1 through 12, defendant SAM SARKIS SOLAKYAN shall forfeit to the United States all right, title, and interest in any property, real or personal, that constitutes or is derived from proceeds traceable to such offenses.

22. If any of the above described forfeitable property, as a result of any act or omission of defendant SAM SARKIS SOLAKYAN (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty;

1 it is the intent of the United States, pursuant to Title 21, United
2 States Code, Section 853(p) and Title 18, United States Code,
3 Section 982(b), to seek forfeiture of any other property of defendant
4 SAM SARKIS SOLAKYAN up to the value of the forfeitable property described
5 above.

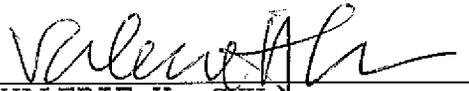
6 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and
7 Title 28, United States Code, Section 2461(c).

8 DATED: September 25, 2018.

9 A TRUE BILL:

10 
11 _____
Foreperson

12 ADAM L. BRAVERMAN
13 United States Attorney

14 By: 
15 _____
16 VALERIE H. CHU
Assistant U.S. Attorney

17 By: 
18 _____
19 CAROLINE P. HAN
Assistant U.S. Attorney

20 By: 
21 _____
22 FRED SHEPPARD
23 Assistant U.S. Attorney
24
25
26
27
28



State of California Secretary of State

S

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FILED
Secretary of State
State of California

AUG 19 2015

1. CORPORATE NAME

VITAL IMAGING PARTNERS, INC.

2. CALIFORNIA CORPORATE NUMBER

C3286355

91.125/PC / US R 8/31/15
THIS SPACE FOR FILING USE ONLY

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 17.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

| 4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE | CITY | STATE | ZIP CODE |
|--|--------------|-------|----------|
| 550 N. Brand Blvd., Ste. 600 | Glendale | CA | 91203 |
| 5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY | CITY | STATE | ZIP CODE |
| 550 N. Brand Blvd., Ste. 600 | Glendale | CA | 91203 |
| 6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4 | CITY | STATE | ZIP CODE |
| 14622 Ventura Blvd., #725 | Sherman Oaks | CA | 91403 |

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

| 7. CHIEF EXECUTIVE OFFICER/ | ADDRESS | CITY | STATE | ZIP CODE |
|-----------------------------|---------------------------|--------------|-------|----------|
| Sam S. Solakyan | 14622 Ventura Blvd., #725 | Sherman Oaks | CA | 91403 |
| 8. SECRETARY | ADDRESS | CITY | STATE | ZIP CODE |
| Sam S. Solakyan | 14622 Ventura Blvd., #725 | Sherman Oaks | CA | 91403 |
| 9. CHIEF FINANCIAL OFFICER/ | ADDRESS | CITY | STATE | ZIP CODE |
| Sam S. Solakyan | 14622 Ventura Blvd., #725 | Sherman Oaks | CA | 91403 |

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

| 10. NAME | ADDRESS | CITY | STATE | ZIP CODE |
|-----------------|---------------------------|--------------|-------|----------|
| Sam S. Solakyan | 14622 Ventura Blvd., #725 | Sherman Oaks | CA | 91403 |
| 11. NAME | ADDRESS | CITY | STATE | ZIP CODE |
| | | | | |
| 12. NAME | ADDRESS | CITY | STATE | ZIP CODE |
| | | | | |

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS

Law Offices of Kevin J. Keenan, a Professional Corporation

C234718

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY

STATE
CA ZIP CODE

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
Diagnostic Imaging

17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

8/17/15

Sam S. Solakyan

President

DATE

TYPE/PRINT NAME OF PERSON COMPLETING FORM

TITLE

SIGNATURE

17-629336



Secretary of State
Statement of Information
(California Stock, Agricultural
Cooperative and Foreign Corporations)

SI-550

97

FILED
Secretary of State
State of California

MAY 18 2017

IMPORTANT — Read instructions before completing this form.

Fees (Filing plus Disclosure) – \$25.00;

Copy Fees – First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00 plus copy fees

1. Corporation Name (Enter the exact name of the corporation as it is recorded with the California Secretary of State. Note: If you registered in California using an assumed name, see instructions.)

Vital Imaging Partners, Inc.

26/75/12
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2. 7-Digit Secretary of State File Number

C3286355

3. Business Addresses

| | | | |
|---|-------------------------------------|-------------|-------------------|
| a. Street Address of Principal Executive Office - Do not list a P.O. Box 777 Cavanagh Road | City (no abbreviations) Glendale | State CA | Zip Code 91207 |
| b. Mailing Address of Corporation, if different than item 3a | City (no abbreviations) | State | Zip Code |
| c. Street Address of Principal California Office, if any and if different than item 3a - Do not list a P.O. Box | City (no abbreviations) | State CA | Zip Code |

4. Officers

The Corporation is required to list all three of the officers set forth below. An additional title for the Chief Executive Officer and Chief Financial Officer may be added; however, the preprinted titles on this form must not be altered.

| | | | | |
|------------------------------------|------------|-------------|-------------------------------------|-------------------------------|
| a. Chief Executive Officer/ Sam | First Name | Middle Name | Last Name Solakyan | Suffix |
| Address 777 Cavanagh Road | | | City (no abbreviations) Glendale | State CA Zip Code 91207 |
| b. Secretary Sam | First Name | Middle Name | Last Name Solakyan | Suffix |
| Address 777 Cavanagh Road | | | City (no abbreviations) Glendale | State CA Zip Code 91207 |
| c. Chief Financial Officer/ Sam | First Name | Middle Name | Last Name Solakyan | Suffix |
| Address 777 Cavanagh Road | | | City (no abbreviations) Glendale | State CA Zip Code 91207 |

5. Director(s)

California Stock and Agricultural Cooperative Corporations ONLY: Item 5a: At least one name and address must be listed. If the Corporation has additional directors, enter the name(s) and addresses on Form SI-550A (see instructions).

| | | | |
|--|-------------|-------------------------------------|-------------------------------|
| a. First Name Sam | Middle Name | Last Name Solakyan | Suffix |
| Address 777 Cavanagh Road | | City (no abbreviations) Glendale | State CA Zip Code 91207 |
| b. Number of Vacancies on the Board of Directors, if any | 0 | | |

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

| | | | |
|---|-------------------------|-------------|----------|
| a. California Agent's First Name (if agent is not a corporation) | Middle Name | Last Name | Suffix |
| b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box | City (no abbreviations) | State CA | Zip Code |

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete item 6a or 6b

Law Offices of Kevin J. Keenan, a Professional Corporation

C 2747181

7. Type of Business

Describe the type of business or services of the Corporation

Diagnostic imaging

8. The information contained herein, including in any attachments, is true and correct.

05-11-17
Date

Sam Solakyan

Type or Print Name of Person Completing the Form

President

Title

2017 California Secretary of State
www.sos.ca.gov/business/be

| | | |
|---|--|------------------------|
|  | <p style="text-align: center;">Secretary of State Certificate of Dissolution (California Stock Corporation ONLY)</p> | <p>DISS STK</p> |
| <p>IMPORTANT — Read Instructions before completing this form.</p> <p>There is No Fee for filing a Certificate of Dissolution - Stock</p> <p>Copy Fees – First page \$1.00; each attachment page \$0.50; Certification Fee - \$5.00 plus copy fees</p> | | |
| <p>1. Corporate Name (Enter the exact name of the Corporation as it is recorded with the California Secretary of State.) VITAL IMAGING PARTNERS, INC.</p> | <p>2. 7-Digit Secretary of State File Number</p> <p style="text-align: center; font-size: 1.2em;">3286355</p> | |

FILED *DB*
 Secretary of State
 State of California
 JUN 19 2018 *GO*

icc

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3. Election

The dissolution was made by a vote of **ALL** of the shareholders of the California corporation.

Note: If the above box is not checked, a **Certificate of Election to Wind Up and Dissolve** (Form ELEC STK) must be filed prior to or together with this Certificate of Dissolution. (California Corporations Code section 1901.)

4. Debts and Liabilities (Check the applicable statement. Only **one** box may be checked. If second box is checked, must include the required information in an attachment.)

The known debts and liabilities have been actually paid or paid as far as its assets permitted.

The known debts and liabilities have been adequately provided for in full or as far as its assets permitted by their assumption. Included in the **attachment** to this certificate, incorporated herein by this reference, is a description of the provisions made and the name and address of the person, corporation or government agency that has assumed or guaranteed the payment, or the depository institution with which deposit has been made.

The corporation never incurred any known debts or liabilities.

5. Required Statements (Do not alter the Required Statements – **ALL** must be true to file Form DISS STK.)

a. The Corporation has been completely wound up and is dissolved.

b. All final returns required under the California Revenue and Taxation Code have been or will be filed with the California Franchise Tax Board.

c. The known assets have been distributed to the persons entitled thereto or the corporation acquired no known assets.

6. Read, Verify, Date and Sign Below (See Instructions for signature requirements.)

The undersigned is the sole director or a majority of the directors now in office. I declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of my own knowledge.

| | | |
|---------------|---|--------------------|
| JUNE 19, 2018 |  | SAM S. SOLAKYAN |
| Date | Signature | Type or Print Name |
| | | |
| Date | Signature | Type or Print Name |
| | | |
| Date | Signature | Type or Print Name |