

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATION
MICHIGAN BOARD OF MEDICINE

In the Matter of
RYAN A. KREBS, M.D.

COMPLAINT

NOW COME the People of the State of Michigan, by Frank J. Kelley, Attorney General, by Thomas L. Sparks, Assistant Attorney General, and hereby file the within Complaint against Ryan A. Krebs, M.D., hereafter Respondent, alleging upon information and belief as follows:

1. The Michigan Board of Medicine, hereafter Board, is an administrative agency created by the Public Health Code, 1978 PA 368, as amended; MCLA 333.1101 et seq; MSA 14.15(1101) et seq.
2. Respondent is currently licensed to practice as a medical physician pursuant to the Public Health Code, supra.
3. On or about January 7, 1983, Respondent was convicted (in the U.S. District Court, Eastern District of Michigan, Southern Division) of Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances, in violation of 21 USC 846, as more specifically set forth in the Indictment which is attached hereto and made a part hereof as if set forth in full. A copy of the Judgment and Probation/Commitment Order is also attached hereto and made a part hereof as if set forth in full.

FURTHER, the People request that pending said hearing and final determination the Board summarily suspend the medical license of Respondent pursuant to section 92 of the Administrative Procedures Act of 1969, supra, and section 16233(3) of the Public Health Code, supra, for the reason that, based upon the allegations set forth herein, to permit Respondent to continue to practice medicine and have access to controlled substances constitutes an imminent danger to the public health, safety and welfare, requiring emergency action.

FRANK J. KELLEY
Attorney General

Thomas L. Sparks
Assistant Attorney General

Business Address:
620 Law Building
525 West Ottawa Street
Lansing, Michigan 48913

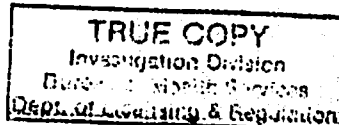
Telephone: (517) 373-1146

DATED: February 8, 1983

STATE OF MICHIGAN)
COUNTY OF INGHAM)

On this 8th day of February, 1983, before me personally appeared the above-named Thomas L. Sparks and made oath that he is an Assistant Attorney General, that he has read the foregoing Complaint by him subscribed and knows the contents thereof, and that the same is true of his own knowledge except as to the matters which are therein stated to be on his information and belief, and as to those matters he believes it to be true.

Martha Jo Blackwell, Notary
Public, Eaton County Acting in
Ingham County, Michigan
My Commission expires 3-23-83



TRUE COPY
Investigation Division
Bureau of Health Services
Dept. of Licensing & Regulation

STATE OF MICHIGAN

DEPARTMENT OF LICENSING AND REGULATION

BOARD OF MEDICINE

In the Matter of

RYAN A. KREBS, M.D.

H.O. No. 83-131

CONSENT ORDER AND STIPULATION

CONSENT ORDER

WHEREAS, an administrative complaint was filed with the Michigan Department of Licensing and Regulation, Board of Medicine, hereafter Board, on February 8, 1983, charging Ryan A. Krebs, M.D., hereafter Respondent, with violation of section 16221(a), (b)(v) and (c)(iv) of the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq; MSA 14.15(1101) et seq, and

WHEREAS, based on said administrative complaint, the Board summarily suspended Respondent's license to practice medicine by order dated February 9, 1983; and

WHEREAS, Respondent admits by stipulation submitted herewith that he was convicted of conspiracy to possess with intent to distribute and to distribute controlled substances in violation of 21 USC 846 and that said conviction constitutes

violation of section 16221(b)(v) of the Public Health Code, supra, as set forth in said complaint; and

WHEREAS, the Board has reviewed said stipulation and, based upon the matters asserted therein, agrees that the public interest is best served by resolution of the outstanding complaint; now, therefore,

IT IS HEREBY FOUND that the allegations of fact set forth in the aforesaid complaint are true and constitute violation of section 16221(b)(v) of the Public Health Code, supra, as set forth in Count I of the aforesaid complaint.

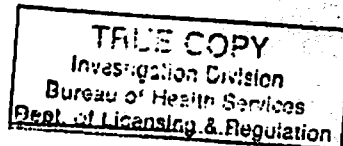
Accordingly,

IT IS HEREBY ORDERED that for violation of section 16221(b)(v) of the Public Health Code, supra, Respondent's license to practice medicine in the state of Michigan shall be and hereby is REVOKED, said revocation to commence on the effective date of this order.

IT IS FURTHER ORDERED that, pursuant to the stipulation of the parties, Counts II and III of the aforesaid complaint shall be and hereby are DISMISSED as moot.

IT IS FURTHER ORDERED that this consent order shall take effect on the date signed by the Chairperson of the Board as indicated below.

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATION
MICHIGAN BOARD OF MEDICINE



In the Matter of
RYAN A. KREBS, M.D.

COMPLAINT

NOW COME the People of the State of Michigan, by Frank J. Kelley, Attorney General, by Thomas L. Sparks, Assistant Attorney General, and hereby file the within Complaint against Ryan A. Krebs, M.D., hereafter Respondent, alleging upon information and belief as follows:

1. The Michigan Board of Medicine, hereafter Board, is an administrative agency created by the Public Health Code, 1978 PA 368, as amended; MCLA 333.1101 et seq; MSA 14.15(1101) et seq.

2. Respondent is currently licensed to practice as a medical physician pursuant to the Public Health Code, supra.

3. On or about January 7, 1983, Respondent was convicted (in the U.S. District Court, Eastern District of Michigan, Southern Division) of Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances, in violation of 21 USC 846, as more specifically set forth in the Indictment which is attached hereto and made a part hereof as if set forth in full. A copy of the Judgment and Probation/Commitment Order is also attached hereto and made a part hereof as if set forth in full.

COUNT I

Said conviction is a felony reasonably related to and adversely affecting Respondent's ability to practice medicine in a safe and competent manner, in violation of section 16221(b)(v) of the Public Health Code, supra.

COUNT II

Said conviction demonstrates Respondent's conduct as set forth in paragraph 3 above is in violation of section 16221(c)(iv) of the Public Health Code, supra.

COUNT III

Said conviction demonstrates conduct which impairs or may impair Respondent's ability to safely and skillfully practice medicine, in violation of section 16221(a) of the Public Health Code, supra.

WHEREFORE, the People request that a hearing be scheduled pursuant to the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCLA 24.201 et seq; MSA 3.560(101) et seq, to determine whether disciplinary action should be taken by the Board against Respondent pursuant to the Public Health Code, supra, for the reasons set forth herein.

FURTHER, that all proceedings in this matter be conducted pursuant to the Public Health Code, supra, the rules promulgated pursuant thereto, and the Administrative Procedures Act of 1969, supra.

FURTHER, the People request that pending said hearing and final determination the Board summarily suspend the medical license of Respondent pursuant to section 92 of the Administrative Procedures Act of 1969, supra, and section 16233(3) of the Public Health Code, supra, for the reason that, based upon the allegations set forth herein, to permit Respondent to continue to practice medicine and have access to controlled substances constitutes an imminent danger to the public health, safety and welfare, requiring emergency action.

FRANK J. KELLEY
Attorney General

Thomas L. Sparks
Assistant Attorney General

Business Address:
620 Law Building
525 West Ottawa Street
Lansing, Michigan 48913

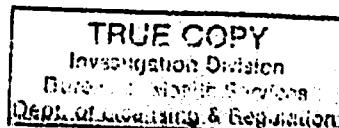
Telephone: (517) 373-1146

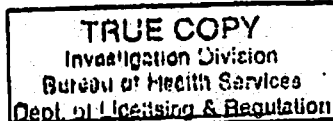
DATED: February 8, 1983

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

On this 8th day of February, 1983, before me personally appeared the above-named Thomas L. Sparks and made oath that he is an Assistant Attorney General, that he has read the foregoing Complaint by him subscribed and knows the contents thereof, and that the same is true of his own knowledge except as to the matters which are therein stated to be on his information and belief, and as to those matters he believes it to be true.

Martha Jo Blackwell, Notary
Public, Eaton County Acting in
Ingham County, Michigan
My Commission expires 3-23-83





STATE OF MICHIGAN

DEPARTMENT OF LICENSING AND REGULATION

BOARD OF MEDICINE

In the Matter of

RYAN A. KREBS, M.D.

H.O. No. 83-131

CONSENT ORDER AND STIPULATION

CONSENT ORDER

WHEREAS, an administrative complaint was filed with the Michigan Department of Licensing and Regulation, Board of Medicine, hereafter Board, on February 3, 1983, charging Ryan A. Krebs, M.D., hereafter Respondent, with violation of section 16221(a), (b)(v) and (c)(iv) of the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq; MSA 14.15(1101) et seq; and

WHEREAS, based on said administrative complaint, the Board summarily suspended Respondent's license to practice medicine by order dated February 9, 1983; and

WHEREAS, Respondent admits by stipulation submitted herewith that he was convicted of conspiracy to possess with intent to distribute and to distribute controlled substances in violation of 21 USC 846 and that said conviction constitutes

violation of section 16221(b)(v) of the Public Health Code, supra, as set forth in said complaint; and

WHEREAS, the Board has reviewed said stipulation and, based upon the matters asserted therein, agrees that the public interest is best served by resolution of the outstanding complaint; now, therefore,

IT IS HEREBY FOUND that the allegations of fact set forth in the aforesaid complaint are true and constitute violation of section 16221(b)(v) of the Public Health Code, supra, as set forth in Count I of the aforesaid complaint.

Accordingly,

IT IS HEREBY ORDERED that for violation of section 16221(b)(v) of the Public Health Code, supra, Respondent's license to practice medicine in the state of Michigan shall be and hereby is REVOKED, said revocation to commence on the effective date of this order.

IT IS FURTHER ORDERED that, pursuant to the stipulation of the parties, Counts II and III of the aforesaid complaint shall be and hereby are DISMISSED as moot.

IT IS FURTHER ORDERED that this consent order shall take effect on the date signed by the Chairperson of the Board as indicated below.

Signed this 19th day of February, 1987.

MICHIGAN BOARD OF MEDICINE

By

Charles C. Vincent, M.D.
Charles C. Vincent, M.D.
Chairperson

I hereby approve the above order
both as to form and substance.

Robert D. Luskin
Robert D. Luskin
Attorney for Respondent

TRUE COPY
Investigation Division
Bureau of Health Services
Dept. of Licensing & Regulation

STIPULATION

NOW COME the respective parties to stipulate and agree
as follows:

1. On January 7, 1983, Respondent was convicted, in the United States District Court for the Eastern District of Michigan, Southern Division, of conspiracy to possess with intent to distribute and to distribute controlled substances, in violation of 21 USC 846, as more specifically set forth in the indictment which is attached to the administrative complaint dated February 8, 1983, and that said conviction is in violation of section 16221(b)(v) of the Public Health Code, supra.

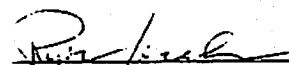
2. Counts II and III of the aforesaid administrative complaint shall be dismissed as moot by order of the Board.

3. The foregoing consent order revoking Respondent's license to practice medicine in the State of Michigan may be entered as the final order of the Board in the within cause.

AGREED TO BY:


Thomas L. Sparks
Assistant Attorney General
Dated: 1-22-87

AGREED TO BY:


Ryan A. Krebs, M.D.
Respondent

mip/3/26.1

TRUE COPY
Investigation Division
Bureau of Health Services
Dept. of Licensing & Regulation

TRUE COPY
Investigation Division
Bureau of Health Services
Dept. of Licensing & Regulation

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATION
MICHIGAN BOARD OF MEDICINE

In the Matter of
RYAN A. KREBS, M.D.

ORDER OF SUMMARY SUSPENSION

WHEREAS, a Complaint has been filed with this Board against the above-named Respondent, as provided by the Public Health Code, 1978 PA 368, as amended; MCLA 333.1101 et seq; MSA 14.15(1101) et seq, the rules promulgated pursuant thereto, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCLA 24.201 et seq; MSA 3.560(101) et seq; and

WHEREAS, the Board, after careful consideration of the pleadings filed in said cause, has concluded that the continued licensure of Respondent constitutes an imminent threat to the public health, safety and welfare requiring emergency action; now, therefore,

IT IS HEREBY ORDERED that Respondent's medical license as heretofore issued by this Board shall be and hereby is summarily suspended effective the date this order is signed by the Board's Chairperson, as indicated below.

Signed this 9th day of February, 1983.

MICHIGAN BOARD OF MEDICINE

By Donald H. Kuper
Chairperson

DEFENDANT

RYAN KREBS

DOCKET NO. >

8280242-3

JUDGMENT AND PROBATION/COMMITMENT ORDER

Form 10-5/75

In the presence of the attorney for the government
the defendant appeared in person on this dateMONTH DAY YEAR
01 07 83

COUNSEL

☐ WITHOUT COUNSEL

However the court advised defendant of right to counsel and asked whether defendant desired to have counsel appointed by the court and the defendant thereupon waived assistance of counsel.

☒ WITH COUNSEL

Kenneth Robinson

(Name of counsel)

PLEA

☐ GUILTY, and the court being satisfied that
there is a factual basis for the plea,☐ NOLO CONTENDERE,☐ GUILTYFINDING &
JUDGMENT

There being a finding/verdict of

☐ NOT GUILTY. Defendant is discharged☒ GUILTY.

Defendant has been convicted as charged of the offense(s) of

Conspiracy to Possess with Intent
to Distribute and to Distribute
Controlled Substances in violation
of 21:USC:846SENTENCE
OR
PROBATION
ORDER

The court asked whether defendant had anything to say why judgment should not be pronounced. Because no sufficient cause to the contrary was shown, or appeared to the court, the court adjudged the defendant guilty as charged and convicted and ordered that: The defendant is hereby committed to the custody of the Attorney General or his authorized representative for imprisonment for a period of 5 years.

SPECIAL
CONDITIONS
OF
PROBATION

IT IS FURTHER ADJUDGED AND ORDERED that a stay of execution be granted pending designation of institution at which time the defendant shall report directly to said designated institution. Bond is continued.

ADDITIONAL
CONDITIONS
OF
PROBATION

In addition to the special conditions of probation imposed above, it is hereby ordered that the general conditions of probation set out in the Federal Rules of Criminal Procedure be imposed. The Court may change the conditions of probation, reduce or extend the period of probation, and at any time during the probation period or within a maximum probation period of five years permitted by law, may issue a warrant and revoke probation for a violation occurring during the probation period.

It orders commitment to the custody of the Attorney General and recommends,

It is ordered that the Clerk, or her
a certified copy of this judgment
and commitment to the U.S. Mar-
shal or other qualified officer.COMMITMENT
RECOMMEN-
DATIONSIGNED BY
CLERK

Anna Diggs Taylor

U.S. District Court
Eastern District of Michigan

01 07 83

I certify that the foregoing is a true and correct copy of the original.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO.

-vs-

VIO: 21 U.S.C. 841(a)(1)
21 U.S.C. 846
21 U.S.C. 848

NELLIE BELL KASSIM,
ALAN DEVORE FIELDS, D.O.,
RYAN KREBS, M.D.,
BERNARD LEVINE,
STANLEY ICZKOVITZ,
ALVIN FISCH,
GANDHI LINGAMNENI,
ANTHONY MOELIG,
DAVID GOLDMAN,
MELVIN BOYER,
SCOTCH CASTLE PHARMACY, INC.,
KWALITY PRESCRIPTION SERVICES, INC.,
7811 GRATIOT, INC.
GILFIX PHARMACY, INC.,
UNAREX OF PLYMOUTH, INC., d/b/a Motor
City Prescription Center,
UNAREX OF DEARBORN, INC., d/b/a Motor
City Prescription Center,
SHIRLEY BRADLEY DANNER,
MAGGIE CURRY,
LINDA RICKS,
ELLA TIPTON,
CASSANDRA BELL,
CURTIS HICKS,
L. C. TURMAN,
JOHN ZELLNER,
JOHN PARKER,
SAM FIELDS, JR.,
DAISY EVELYN MADISON,
ROBERT LEE ELLIOTT,
JOSEPH WILLIAMS

-Defendants.

I hereby certify that the foregoing is
a true copy of the original filed in this
Office.

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

By *[Signature]*
Deputy

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. 841(a)(1) & 846
Conspiracy to Possess with
Intent to Distribute and to
Distribute Controlled Substances)

That from on or about January 1, 1979, to and including
the date of this indictment, in the Eastern District of
Michigan, Southern Division, and elsewhere, NELLIE BELL
KASSIM, ALAN DEVORE FIELDS, D.O., RYAN KREBS, M.D., BERNARD
LEVINE, STANLEY ICZKOVITZ, ALVIN FISCH, GANDHI LINGAMNENI,
ANTHONY MOELIG, DAVID GOLDMAN, MELVIN BOYER, SCOTCH CASTLE
PHARMACY, INC., KWALITY PRESCRIPTION SERVICES, INC., 7611

GRATIOT, INC., GILFIX PHARMACY, INC., UNAREX OF PLYMOUTH, INC., d/b/a Motor City Prescription Center, UNAREX OF DEARBORN, INC., d/b/a Motor City Prescription Center, SHIRLEY BRADLEY DANNER, MAGGIE CURRY, LINDA RICKS, ELLA TIPTON, CASSANDRA BELL, CURTIS HICKS, L. C. TURMAN, JOHN ZELLNER, JOHN PARKER, SAM FIELDS, JR., DAISY EVELYN MADISON, ROBERT LEE ELLIOTT, JOSEPH WILLIAMS, and other persons to the Grand Jury both known and unknown, did wilfully, knowingly and unlawfully conspire, confederate and agree together and with each other wilfully, knowingly and unlawfully and in a manner not authorized by law or regulation, to possess with intent to distribute and to distribute the following controlled substances: Preludin (phenmetrazine), a Schedule II Non-Narcotic Drug Controlled Substance; Talwin (pentazocine), a Schedule IV Controlled Substance; Valium (diazepam), a Schedule IV Controlled Substance; Desoxyn (methamphetamine), a Schedule II Non-Narcotic Controlled Substance; Percodan (oxycodone), a Schedule II Narcotic Drug Controlled Substance; Ambenyl, a Schedule V Controlled Substance; Tussionex, a Schedule III Controlled Substance; Empirin #4, a Schedule III Controlled Substance; and Dilaudid (hydromorphone), a Schedule II Narcotic Drug Controlled Substance; contrary to the provisions of Section 841(a)(1), Title 21, United States Code; all in violation of Section 846, Title 21, United States Code.

That as part of said conspiracy NELLIE BELL KASSIM operated and managed a series of clinics in Detroit, Michigan, where prescriptions for various controlled substances were sold for cash to buyers who, as NELLIE BELL KASSIM and her coconspirators well knew, were not using the controlled substances obtained by said prescriptions for any legitimate medical purposes. That as further part of said conspiracy NELLIE BELL KASSIM directed her doctor-coconspirators to write additional prescriptions for controlled substances which she and her coconspirators used to obtain controlled substances for illegal sale in Detroit, Michigan, Washington,

D.C., and elsewhere. That as further part of said conspiracy, NELLIE BELL KASSIM, procured false and forged prescriptions for controlled substances which she and her coconspirators used to obtain controlled substances for illegal sale in Detroit, Michigan, Washington, D.C., and elsewhere. That as further part of said conspiracy, NELLIE BELL KASSIM organized and managed the distribution of controlled substances thus obtained.

That as part of said conspiracy, ALAN DEVORE FIELDS, D.O., RYAN KREBS, M.D., and other doctor-coconspirators, worked at the clinics operated and managed by NELLIE BELL KASSIM. Their duties included meeting with customers at the clinics and writing the customers prescriptions for controlled substances, which prescriptions, as they well knew, were not intended for any legitimate medical use. They also wrote additional prescriptions which NELLIE BELL KASSIM and her coconspirators used to obtain controlled substances for illegal sale in Detroit, Michigan, Washington, D. C., and elsewhere.

That as a part of said conspiracy SHIRLEY BRADLEY DANNER, MAGGIE CURRY, ELLA TIPTON, CASSANDRA BELL, LINDA RICKS, JOHN ZELLNER, L.C. TURMAN, JOHN PARKER, and CURTIS HICKS, worked at the clinics operated and managed by NELLIE BELL KASSIM. SHIRLEY BRADLEY DANNER, MAGGIE CURRY, ELLA TIPTON, CASSANDRA BELL, LINDA RICKS, JOHN PARKER, JOHN ZELLNER, CURTIS HICKS, L.C. TURMAN, and other employee coconspirators answered phones, made phone calls, greeted customers, collected money, kept records, helped to write prescriptions, performed cursory examinations of customers, kept order at the clinics, delivered prescriptions to pharmacies, picked controlled substances up from pharmacies, and delivered controlled substances to NELLIE BELL KASSIM. SHIRLEY BRADLEY DANNER, MAGGIE CURRY, ELLA TIPTON, CASSANDRA BELL, LINDA RICKS, JOHN PARKER, JOHN ZELLNER, CURTIS HICKS, L. C. TURMAN, and other employee-coconspirators performed such other duties as NELLIE BELL KASSIM directed. In per-

forming the above described duties, SHIRLEY BRADLEY DANNER, MAGGIE CURRY, ELLA TIPTON, CASSANDRA BELL, LINDA RICKS, JOHN PARKER, JOHN ZELLNER, CURTIS HICKS, L.C. TURMAN, and other employee-coconspirators well knew that they were furthering a conspiracy to possess with intent to distribute and to distribute controlled substances.

That as part of said conspiracy, BERNARD LEVINE, SCOTCH CASTLE PHARMACY, INC., STANLEY ICZKOVITZ, ALVIN FISCH, GANDHI LINGAMNENI, KWALITY PRESCRIPTION SERVICES, INC., ANTHONY MOELHIG, 7811 GRATIOT, INC., DAVID GOLDMAN, GILFIX PHARMACY, INC., MELVIN BOYER, UNAREX OF PLYMOUTH, INC., UNAREX OF DEARBORN, INC., and other pharmacist-pharmacy coconspirators cooperated with NELLIE BELL KASSIM and the clinics operated and managed by her by filling the prescriptions written by ALAN DEVORE FIELDS, D.O., RYAN KREBS, M.D., and other doctor-coconspirators, and certain false and forged prescriptions, even though BERNARD LEVINE, SCOTCH CASTLE PHARMACY, INC., STANLEY ICZKOVITZ, ALVIN FISCH, GANDHI LINGAMNENI, KWALITY PRESCRIPTION SERVICES, INC., ANTHONY MOEHLIG, 7811 GRATIOT INC., DAVID GOLDMAN, GILFIX PHARMACY, INC., MELVIN BOYER, UNAREX OF PLYMOUTH, INC., UNAREX OF DEARBORN, INC., and other pharmacist-pharmacy-coconspirators well knew that these prescriptions had not been written for any legitimate medical purposes.

That as part of said conspiracy SAM FIELDS, JR., DAISY EVELYN MADISON, and other coconspirators bought quantities of prescriptions for controlled substances from NELLIE BELL KASSIM and the clinics operated and managed by her, which prescriptions they used to obtain controlled substances that they then sold within the Eastern District of Michigan and elsewhere.

That as part of said conspiracy, ROBERT LEE ELLIOTT, JOSEPH WILLIAMS, and other coconspirators bought quantities of controlled substances from NELLIE BELL KASSIM, which they then sold in Detroit, Michigan, Washington, D.C. and elsewhere.

All in violation of Sections 841(a)(1) and 846, Title 21, United States Code.

OVERT ACTS

That in furtherance of said conspiracy and in order to effect the objectives thereof, the various defendants and other coconspirators did commit the following overt acts, among others:

1. On or about October 23, 1979, NELLIE BELL KASSIM sold approximately 4000 Preludin (75 mg) to ROBERT LEE ELLIOTT.
2. On or about March 27, 1980, NELLIE BELL KASSIM, ALAN DEVORE FIELDS, D.O., and others opened the Downtown Medical Clinic, 3800 Woodward, Detroit, Michigan.
3. On April 8, 1980, NELLIE BELL KASSIM instructed the customers at Downtown Medical Clinic to go to KQUALITY PRESCRIPTION SERVICES, INC., 17131 Schaefer, Detroit, Michigan to fill their prescriptions.
4. On or about April 14, 1980, NELLIE BELL KASSIM, ALAN DEVORE FIELDS, D.O., and others moved the Downtown Medical Clinic to Suite 1053 David Whitney Building, 1553 Woodward Avenue, Detroit, Michigan.
5. On April 22, 1980, ALAN DEVORE FIELDS, D.O., wrote a prescription for 30 Preludin (75 mg) in the name of Cynthia Hampton.
6. On April 22, 1980, ALAN DEVORE FIELDS, D.O., wrote a prescription for 30 Preludin (75 mg) in the name of Stephen Walker.
7. On April 22, 1980, ALAN DEVORE FIELDS, D.O., instructed the customers at the Downtown Medical Center to go to Rosedale Pharmacy, 18151 W. McNichols Road, Detroit, Michigan. ALVIN FISCH is a pharmacist-owner of Rosedale Pharmacy.
8. On or about April, 1980, NELLIE BELL KASSIM and others transported a quantity of Preludin from Detroit, Michigan to Jamaica, New York.
9. On or about May 16, 1980, NELLIE BELL KASSIM, ALAN DEVORE FIELDS, D.O., and others moved the Downtown Medical

Center to 9964 Gratiot, Detroit, Michigan. The name of the Downtown Medical Center was later changed to Harper-Gratiot Medical Center and then to Bariatric Medical Center.

10. On or about July, 1980, on instructions from NELLIE BELL KASSIM, CURTIS HICKS, and others picked up a quantity of Preludin from GANDHI LINGAMNENI at KWALITY PRESCRIPTION SERVICE, INC., and delivered it to NELLIE BELL KASSIM. NELLIE BELL KASSIM and others took the Preludin to Washington, D.C. for purpose of sale.

11. On or about July 2, 1980, NELLIE BELL KASSIM sold approximately 1500 Preludin (75 mg) to JOSEPH WILLIAMS.

12. On or about July 4, 1980, ALAN DEVORE FIELDS, D.O., presigned a quantity of prescriptions for 30 Preludin (75 mg).

13. On or about July 10, 1980, ANTHONY MOEHLIG opened Raelig Pharmacy at 9964 Gratiot Avenue, Detroit, Michigan.

14. On or about July 25, 1980, ALAN DEVORE FIELDS, D.O., wrote a prescription for 30 Preludin (75 mg) in the name of Cynthia Hampton.

15. On or about August 14, 1980, Rosedale Pharmacy ordered 10,800 Preludin (75 mg) from National Wholesale Drug Co. in Detroit, Michigan. ALVIN FISCH is a pharmacist-owner of Rosedale Pharmacy.

16. On or about August 27, 1980, ALAN DEVORE FIELDS, D.O., wrote a prescription for 50 Dilaudid (4 mg) in the name of ELLA TIPTON.

17. On or about August 27, 1980, at Raelig Pharmacy, ANTHONY MOEHLIG filled a prescription for 50 Dilaudid (4 mg) in the name ELLA TIPTON.

18. On or about September 10, 1980, ALAN DEVORE FIELDS, D.O., wrote a prescription for 30 Preludin (75 mg) in the name of Stephen Walker.

19. On or about September 10, 1980, at Raelig Pharmacy, ANTHONY MOEHLIG filled a prescription for 30 Preludin (75 mg) in the name of Stephen Walker.

20. On September 17, 1980, ALAN DEVORE FIELDS, D.O., wrote a prescription for 30 Preludin (75 mg) in the name of James L. Roberts.

21. On or about September 22, 1980, CASSANDRA BELL had in her possession nine prescription vials, each containing 30 Preludin (75 mg), all having been filled by ANTHONY MOEHLIG at the Raelig Pharmacy on September 22, 1980, in a variety of patient names.

22. On or about October, 1980, NELLIE BELL KASSIM, ALAN DEVORE FIELDS, D.O., and others moved the Bariatric Medical Center to 18055 Greenfield, Detroit, Michigan, and changed its name to the RNA Medical Clinic.

23. On or about December, 1980, SHIRLEY BRADLEY DANNER delivered a quantity of prescriptions to NELLIE BELL KASSIM at Dickie's Hair Replacement Center, 22255 Greenfield, Detroit, Michigan.

24. On or about December, 1980, STANLEY ICZKOVITZ met with NELLIE BELL KASSIM at Dickie's Hair Replacement Center, 22255 Greenfield in Detroit, Michigan.

25. During 1980 DAISY EVELYN MADISON bought quantities of prescriptions in various names from the several clinics operated by NELLIE BELL KASSIM.

26. During 1980 and 1981 SAM FIELDS, JR., bought quantities of prescriptions in various names at the several clinics operated by NELLIE BELL KASSIM.

27. During 1980 JOHN PARKER performed various functions for the several clinics operated by NELLIE BELL KASSIM.

28. During 1980 and 1981 JOHN ZELLNER performed various functions for the several clinics operated by NELLIE BELL KASSIM.

29. On or about January, 1981, Stanley Drugs ordered 14,400 Talwin (50 mg) and 2400 Preludin (75 mg) from Sobel Company in Hauppauge, New York. STANLEY ICZKOVITZ is a pharmacist-owner of Stanley Drugs.

30. On or about January, 1981, Stanley Drugs ordered 6000 Preludin (75 mg) from Generix Drugs, Inc. in Hollywood.

Florida. STANLEY ICZKOVITZ is a pharmacist-owner of Stanley Drugs.

31. On or about January, 1981, SCOTCH CASTLE PHARMACY, INC., ordered 7200 Preludin (75 mg) from Generix Drugs, Inc., in Hollywood, Florida. BERNARD LEVINE is a pharmacist at SCOTCH CASTLE PHARMACY, INC.

32. On or about January, 1981, SCOTCH CASTLE PHARMACY, INC., ordered 15,600 Talwin (50 mg) from Sobel Company in Hauppauge, New York. BERNARD LEVINE is a pharmacist at SCOTCH CASTLE PHARMACY INC.

33. On or about February 13, 1981, NELLIE BELL KASSIM and Nancy McGinnis transported approximately 9000 Preludin (75 mg) from Detroit, Michigan, to the Washington National Airport.

34. On March 7, 1981, NELLIE BELL KASSIM instructed an employee of RNA Medical Clinic to send the customers of the clinic to SCOTCH CASTLE PHARMACY, INC., Stanley Drugs, and the pharmacy on Conner Road.

35. In March, 1981, SCOTCH CASTLE PHARMACY, INC., ordered 28,800 Talwin (50 mg) and 16,400 Preludin (75 mg) from Spencer Mead in Long Island, New York. BERNARD LEVINE is a pharmacist at SCOTCH CASTLE PHARMACY, INC.

36. On or about March 7, 1981, LINDA RICKS told a customer of RNA Medical Clinic that he had to go to the pharmacy he was sent to.

37. On or about March 7, 1981, L. C. TURMAN agreed to allow a customer at RNA Medical Clinic to use a false name.

38. That on or about March, 1981, UNAREX OF DEARBORN, INC., d/b/a Motor City Prescription Center, received approximately 24,600 Preludin (75 mg) from pharmaceutical wholesalers. MELVIN BOYER is part owner of UNAREX OF DEARBORN, INC.

39. That on or about March, 1981, GILFIX PHARMACY, INC., received approximately 53,900 Dilaudid (4 mg) from pharmaceutical wholesalers. DAVID GOLDMAN is a pharmacist at GILFIX PHARMACY, INC.

40. That on or about March, 1981, GILFIX PHARMACY, INC., received approximately 111,000 Talwin (50 mg) from pharmaceutical wholesalers. DAVID GOLDMAN is a pharmacist at GILFIX PHARMACY, INC.

41. On or about March 14, 1981, BERNARD LEVINE left a message for NELLIE BELL KASSIM that she could bring thirty prescriptions a day.

42. On or about March 17, 1981, NELLIE BELL KASSIM instructed ELLA TIPTON to call patients and have them come to the RNA Medical Clinic.

43. On or about April, 1981, KWALITY PRESCRIPTION SERVICES, INC., ordered approximately 24,000 Preludin (75 mg) from Ketchum Distributors, Inc. in Detroit, Michigan. GANDHI LINGAMNENI is a pharmacist at KWALITY PRESCRIPTION SERVICES, INC.

44. On or about April, 1981, KWALITY PRESCRIPTION SERVICES, INC., ordered approximately 4800 Dilaudid (4 mg) from Ketchum Distributors, Inc. in Detroit, Michigan. GANDHI LINGAMNENI is a pharmacist at KWALITY PRESCRIPTION SERVICES, INC.

45. That on or about April, 1981, UNAREX OF PLYMOUTH, INC., d/b/a Motor City Prescription Center, received approximately 53,200 Talwin (50 mg) from pharmaceutical wholesalers. MELVIN BOYER is a pharmacist at UNAREX OF PLYMOUTH, INC.

46. That on or about April, 1981, UNAREX OF DEARBORN, INC., d/b/a Motor City Prescription Center, received approximately 57,100 Preludin (75 mg) from pharmaceutical wholesalers. MELVIN BOYER is a part owner of UNAREX OF DEARBORN, INC.

47. That on or about May, 1981, 7811 GRATIOT, INC., received approximately 24,500 Dilaudid (4 mg) from pharmaceutical wholesalers. ANTHONY MOELIG is a pharmacist at 7811 GRATIOT, INC.

48. That on or about May, 1981, GILFIX PHARMACY, INC., received approximately 38,000 Dilaudid (4 mg) from pharma-

ceutical wholesalers. DAVID GOLDMAN is a pharmacist at GILFIX PHARMACY, INC.

49. That on or about May 22, 1981, SCOTCH CASTLE PHARMACY, INC. ordered 86,400 Talwin (50 mg) from the Jewett Drug Company in Aberdeen, South Dakota. BERNARD LEVINE is a pharmacist at SCOTCH CASTLE PHARMACY, INC.

50. That on or about June 1, 1981, NELLIE BELL KASSIM, RYAN KREBS, M.D., and others moved the RNA Medical Clinic to 17306 West Seven Mile Road, Detroit, Michigan and changed its name to the Medical Clinic Center.

51. That on or about October 1, 1981, NELLIE BELL KASSIM, RYAN KREBS, M.D., and others opened the Jefferson Medical Clinic, 12874 East Jefferson, Detroit, Michigan.

52. That on or about October 28, 1981, RYAN KREBS, M.D., wrote a prescription for 50 Talwin (50 mg) in the name of David Louis Green.

53. That on or about November 11, 1981, RYAN KREBS, M.D., wrote a prescription for 50 Talwin (50 mg) in the name of David Louis Green.

54. On or about November 19, 1981, RYAN KREBS, M.D., wrote a prescription for 50 Talwin (50 mg) in the name of David Louis Green.

55. On or about December 9, 1981, RYAN KREBS, M.D. wrote prescriptions for 50 Talwin (50 mg) in the name of David Louis Green.

All in violation of Sections 841(a)(1) and 846, Title 21, United States Code.

COUNT TWO

(21 U.S.C. §848
Engaging in a Continuing
Criminal Enterprise)

That from on or about January 1, 1979, to and including the date of this indictment, in the Eastern District of Michigan, Southern Division, and elsewhere, NELLIE BELL KASSIM, defendant herein, wilfully, knowingly, unlawfully and intentionally did engage in a continuing criminal enterprise, in that she wilfully, knowingly, unlawfully and intentionally

did violate Title 21, United States Code, Sections 841(a)(1) and 846 as alleged in Count One of this Indictment, which count is incorporated herein by reference, which violations were part of a continuing series of at least three violations of Subchapters I and II of the Drug Abuse Control Act of 1970 (Pub. L. 91-513, Title II, Section 101 et seq., October 27, 1970, 84 Stat. 1242, 21 U.S.C. 801 et seq.) undertaken by NELLIE BELL KASSIM, in concert with at least five other persons with respect to whom the defendant, NELLIE BELL KASSIM, occupied a position of organizer, supervisor, and manager, and from which continuing series of violations the defendant, NELLIE BELL KASSIM, obtained substantial income and resources; in violation of Section 848, Title 21, United States Code.

Furthermore, from her engagement in the aforesaid continuing criminal enterprise, the defendant NELLIE BELL KASSIM, obtained profits and property which she shall forfeit to the United States pursuant to Section 848(a)(2), Title 21, United States Code, including all profits obtained by NELLIE BELL KASSIM arising from her participation in such enterprise and any of her interests, property, and contractual rights of any kind affording a source of influence over such enterprise. These assets include but are not limited to the following:

1. 1980 Mercedes Benz, VIN. NO. 12303312071071
2. 1981 Datsun, VIN NO. JN1SU01S9BT000211.
3. Any and all automobiles, trucks or vehicles of any kind and any airplane, boat or vessel of any kind owned by or purchased by NELLIE BELL KASSIM.
4. All cash, real property, contents of safe deposit boxes, currency, checks, stocks, investments, amounts owed to NELLIE BELL KASSIM, and securities obtained through the enterprise; which items are possessed or controlled by NELLIE BELL KASSIM.

All in violation of Section 848, Title 21, United States Code.

THIS IS A TRUE BILL

LEONARD R. GILMAN
United States Attorney

FOREPERSON

ELLEN DENNIS (P24400)
Assistant United States Attorney

Dated: