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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASVEEN SANGHA,
aka "the Ketamine Queen," and
SALVADOR PLASENCIA,
aka "Dr. P.,"

Defendants.

CR 24-00236(A)-SPG

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute Ketamine; 21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i): Distribution of Ketamine Resulting in Death; 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii): Possession with Intent to Distribute Methamphetamine; 21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i): Possession with Intent to Distribute, and Distribution of, Ketamine; 21 U.S.C. § 856: Maintaining a Drug Involved Premises; 18 U.S.C. § 1519: Altering and Falsifying Records Related to a Federal Investigation; 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this First Superseding Indictment:

1. Defendant JASVEEN SANGHA, also known as ("aka") the "Ketamine Queen," was a resident of North Hollywood, California, who used her North Hollywood residence (the "SANGHA Stash House") to store, package, and distribute narcotics, including ketamine and methamphetamine.

2. Defendant SALVADOR PLASENCIA, aka "Dr. P.," and Co-Conspirator Mark Chavez were medical doctors licensed to practice in the State of California. Defendant PLASENCIA and Co-Conspirator Chavez had previously applied for and obtained authorization from the Drug Enforcement Administration ("DEA") to dispense, administer, and prescribe narcotics and other controlled substances, so long as such prescriptions were for a legitimate medical purpose.

3. Ketamine was a Schedule III controlled substance that was FDA-approved for induction and maintenance of general anesthesia during surgical procedures. Due to the medical risks associated with ketamine, it was widely accepted in the medical community that a health care professional was required to monitor a patient who had just been given ketamine. While monitoring a patient who had been administered ketamine, it was necessary for the health care professional to have access to certain lifesaving equipment, including a defibrillator, a supply of supplemental oxygen, equipment to monitor the patient's heart rate and breathing, and medication to ensure patient safety.

1 4. Defendant SANGHA similarly knew that the unsupervised and
2 improper use of ketamine can be deadly. As alleged in Count Three,
3 on August 26, 2019, defendant SANGHA sold ketamine to a customer,
4 namely, Victim C.M., who died of a drug overdose within a day of the
5 drug deal. As a result, a family member of Victim C.M. informed
6 defendant SANGHA of the death in a text message, stating: "The
7 ketamine you sold my brother killed him. It's listed as the cause of
8 death." Within days of receiving this text, defendant SANGHA
9 confirmed that ketamine can kill by conducting a Google search for
10 "can ketamine be listed as a cause of death[?]"

11 5. Co-Conspirator Kenneth Iwamasa was a resident of Los
12 Angeles County and employed as the live-in personal assistant to
13 Victim M.P. Co-Conspirator Iwamasa had never received medical
14 training and knew little, if anything, about administering and/or
15 treating patients with controlled substances, as defendant PLASENCIA
16 well knew.

17 6. Co-Conspirator Erik Fleming was an acquaintance of Victim
18 M.P. and a resident of Hawthorne, California.

19 7. Defendant PLASENCIA, Co-Conspirator Iwamasa, Co-Conspirator
20 Fleming, and Co-Conspirator Chavez were aware that Victim M.P. had a
21 history of drug abuse and addiction, and that Victim M.P. had sought
22 on multiple occasions assistance to treat his drug addiction and to
23 maintain his sobriety.

24 B. OBJECT OF THE CONSPIRACY

25 Beginning on a date unknown and continuing until at least on or
26 about October 30, 2023, in Los Angeles County, within the Central
27 District of California, and elsewhere, defendants PLASENCIA and
28 SANGHA conspired with Co-Conspirators Iwamasa, Fleming, and Chavez,

1 and others known and unknown to the Grand Jury, to knowingly and
2 intentionally distribute ketamine, a Schedule III controlled
3 substance, in violation of Title 21, United States Code, Sections
4 841(a)(1), 841(b)(1)(E)(i).

5 C. MANNER AND MEANS OF THE CONSPIRACY

6 The object of the conspiracy was to be accomplished, in
7 substance, as follows:

8 1. Co-Conspirator Iwamasa would communicate with other co-
9 conspirators, including defendant PLASENCIA and Co-Conspirator
10 Fleming, about purchasing ketamine to distribute to Victim M.P.

11 2. The co-conspirators would use encrypted messaging
12 applications and coded language to discuss drug deals, including
13 referring to bottles of ketamine as "Dr. Pepper," "cans," and "bots."

14 3. After discussing ketamine orders with Co-Conspirator
15 Iwamasa, Co-Conspirator Fleming and defendant PLASENCIA would
16 communicate with their ketamine sources of supply, including
17 defendant SANGHA and Co-Conspirator Chavez, respectively, about
18 inventory, price, and availability of ketamine to sell to Co-
19 Conspirator Iwamasa and Victim M.P.

20 4. Defendant SANGHA would operate and maintain the SANGHA
21 Stash House in North Hollywood, California, which defendant SANGHA
22 would use to store, package, and distribute narcotics, including
23 providing ketamine to Co-Conspirator Fleming so that Co-Conspirator
24 Fleming could sell it to Victim M.P.

25 5. Co-Conspirator Iwamasa would meet with co-conspirators,
26 including defendant PLASENCIA and Co-Conspirator Fleming, to purchase
27 ketamine for Victim M.P.

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1 6. Defendant PLASENCIA would distribute ketamine to Co-
2 Conspirator Iwamasa and Victim M.P. outside the usual course of
3 professional practice and without a legitimate medical purpose,
4 including by teaching Co-Conspirator Iwamasa how to inject Victim
5 M.P. with ketamine, selling ketamine to Co-Conspirator Iwamasa to
6 inject into Victim M.P., injecting ketamine into Victim M.P. without
7 the proper safety equipment, and failing to properly monitor Victim
8 M.P. after defendant PLASENCIA injected Victim M.P. with ketamine.

9 7. Using the instructions and syringes provided by defendant
10 PLASENCIA, Co-Conspirator Iwamasa would inject Victim M.P. with the
11 ketamine that was sold to Co-Conspirator Iwamasa by defendant
12 PLASENCIA, Co-Conspirator Fleming, and defendant SANGHA.

13 8. On October 28, 2023, using syringes provided by defendant
14 PLASENCIA, Co-Conspirator Iwamasa injected Victim M.P. with multiple
15 doses of the ketamine he received from Co-Conspirator Fleming and
16 defendant SANGHA, resulting in the death and serious bodily injury of
17 Victim M.P.

18 D. OVERT ACTS

19 On or about the following dates, in furtherance of the
20 conspiracy and to accomplish its object, defendants PLASENCIA and
21 SANGHA, and others known and unknown to the Grand Jury, committed
22 various overt acts within the Central District of California, and
23 elsewhere, including, but not limited to, the following:

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1 **Defendant PLASENCIA and Co-Conspirator Chavez Conspire to Sell**
2 **Ketamine to Victim M.P.**

3 Overt Act No. 1: On September 30, 2023, after learning that
4 Victim M.P. was interested in obtaining ketamine, defendant PLASENCIA
5 contacted Co-Conspirator Chavez about purchasing ketamine so that he
6 could sell the ketamine to Victim M.P.

7 Overt Act No. 2: On September 30, 2023, in text messages with
8 Co-Conspirator Chavez, defendant PLASENCIA discussed how much to
9 charge Victim M.P. for ketamine, stating: "I wonder how much this
10 moron will pay" and "Lets find out."

11 Overt Act No. 3: On September 30, 2023, Co-Conspirator Chavez
12 confirmed he was willing to sell ketamine to defendant PLASENCIA and
13 then sent a photograph of ketamine lozenges that Co-Conspirator
14 Chavez had previously obtained by writing a fraudulent prescription
15 in the name of V.B. without V.B.'s knowledge or consent (the
16 "Fraudulent V.B. Prescription").



1 Overt Act No. 4: On September 30, 2023, in text messages, Co-
2 Conspirator Chavez and defendant PLASENCIA arranged to meet in Costa
3 Mesa, California, so that defendant PLASENCIA could obtain liquid
4 ketamine and the Fraudulent V.B. Prescription from Co-Conspirator
5 Chavez.

6 Overt Act No. 5: On September 30, 2023, Co-Conspirator Chavez
7 met with defendant PLASENCIA in or around Costa Mesa, California,
8 within the Central District of California, and sold defendant
9 PLASENCIA at least four vials of liquid ketamine, ketamine lozenges
10 from the Fraudulent V.B. Prescription, gloves, and syringes.

11 **Defendant PLASENCIA Leaves Ketamine with Co-Conspirator Iwamasa and**
12 **Teaches Co-Conspirator Iwamasa How to Inject Ketamine**

13 Overt Act No. 6: On September 30, 2023, in text messages to
14 Victim M.P., defendant PLASENCIA confirmed he planned to leave vials
15 of ketamine with Victim M.P. for self-administration, stating: "I
16 will give you first dose if you would like and leave supplies with
17 you."

18 Overt Act No. 7: On September 30, 2023, after injecting
19 Victim M.P. with ketamine at Victim M.P.'s residence in the Central
20 District of California, defendant PLASENCIA gave instructions to Co-
21 Conspirator Iwamasa about how to inject ketamine and left ketamine
22 and syringes with Co-Conspirator Iwamasa so that Co-Conspirator
23 Iwamasa could administer ketamine to Victim M.P.

24 Overt Act No. 8: On September 30, 2023, Co-Conspirator
25 Iwamasa paid defendant PLASENCIA approximately \$4,500 in cash for the
26 ketamine referenced in Overt Act No. 7.

27 Overt Act No. 9: On September 30, 2023, defendant PLASENCIA
28 sent text messages to Co-Conspirator Chavez describing the meeting

1 with Victim M.P., stating it was "like a bad movie" and confirming
2 that defendant PLASENCIA would send Co-Conspirator Chavez payment
3 soon.

4 **In Early October 2023, Defendant PLASENCIA Sells Additional Ketamine**
5 **to Co-Conspirator Iwamasa**

6 Overt Act No. 10: On October 2, 2023, Co-Conspirator Iwamasa
7 sent defendant PLASENCIA a text message in coded language, stating
8 that Co-Conspirator Iwamasa wanted to purchase vials of ketamine and
9 not injection sessions: "Want to end up with 8 bottles of dr pepper,
10 not just 8 sessions."

11 Overt Act No. 11: On October 2, 2023, in response to the text
12 message described in Overt Act No. 10, defendant PLASENCIA confirmed
13 he "[u]nderstood."

14 Overt Act No. 12: On October 2, 2023, ahead of a planned
15 meeting between defendant PLASENCIA and Victim M.P., defendant
16 PLASENCIA told Co-Conspirator Chavez, "[i]f today goes well we may
17 have repeat business."

18 Overt Act No. 13: On October 2, 2023, in text messages to
19 defendant PLASENCIA, Co-Conspirator Chavez discussed selling ketamine
20 to Victim M.P., stating: "[y]ou should sell him the troches,"
21 referring to the Fraudulent V.B. Prescription.

22 Overt Act No. 14: On October 2, 2023, defendant PLASENCIA
23 traveled to Victim M.P.'s residence to inject him with ketamine and
24 sell additional ketamine, including ketamine lozenges (i.e., the
25 Fraudulent V.B. Prescription).

26 Overt Act No. 15: On October 2, 2023, in text messages,
27 defendant PLASENCIA updated Co-Conspirator Chavez about his visit to
28 Victim M.P.'s residence, including stating he intended to administer

1 360 milligrams of ketamine to Victim M.P. over the span of
2 approximately an hour.

3 Overt Act No. 16: On October 2, 2023, defendant PLASENCIA
4 injected Victim M.P. with ketamine, and sold Co-Conspirator Iwamasa
5 liquid ketamine and ketamine lozenges from the Fraudulent V.B.
6 Prescription in exchange for cash.

7 Overt Act No. 17: On October 2, 2023, in text messages with
8 Co-Conspirator Chavez, defendant PLASENCIA discussed needing
9 additional ketamine to sell to Victim M.P.

10 Overt Act No. 18: On October 2, 2023, to obtain more ketamine
11 to sell to Victim M.P., Co-Conspirator Chavez placed an order for 10
12 vials of ketamine from a wholesale distributor of controlled
13 substances ("Wholesale Ketamine Distributor 1").

14 Overt Act No. 19: On October 2, 2023, Co-Conspirator Chavez
15 submitted a License Authorization Form to a different wholesale
16 distributor of controlled substances ("Wholesale Ketamine Distributor
17 2") for the purpose of obtaining additional ketamine to sell to
18 Victim M.P. Among other things, the License Authorization Form
19 contained false statements, including that the ketamine "will not be
20 sold to a third party, distributed or used for any other purpose."

21 Overt Act No. 20: On October 4, 2023, in text messages using
22 coded language, Co-Conspirator Iwamasa told defendant PLASENCIA he
23 needed to purchase additional bottles of ketamine, stating: "I will
24 need to get more cans of dr pepper from you today, I can come to you
25 to make it convenient."

26 Overt Act No. 21: On October 4, 2023, Co-Conspirator Iwamasa
27 told defendant PLASENCIA that he had successfully injected Victim
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1 M.P. with ketamine, noting: “[f]ound the sweet spot but trying
2 different places led to running out” of ketamine.

3 Overt Act No. 22: On October 4, 2023, in response to the text
4 message referenced in Overt Act No. 21, defendant PLASENCIA advised
5 he could deliver more ketamine to Co-Conspirator Iwamasa and said, “I
6 have ideas on how to get consistent results.”

7 Overt Act No. 23: On October 4, 2023, in response to Co-
8 Conspirator Iwamasa’s text messages requesting to purchase ketamine
9 “now,” defendant PLASENCIA stated he was “currently retrieving 4
10 bottles” from his source, referring to Co-Conspirator Chavez.

11 Overt Act No. 24: On October 4, 2023, defendant PLASENCIA
12 traveled to Irvine, California, to purchase eight vials of liquid
13 ketamine from defendant CHAVEZ.

14 Overt Act No. 25: On October 4, 2023, defendant PLASENCIA
15 injected Victim M.P. with ketamine and sold multiple vials of
16 ketamine to Co-Conspirator Iwamasa.

17 Overt Act No. 26: On October 4, 2023, in text messages to Co-
18 Conspirator Chavez, defendant PLASENCIA asked whether Co-Conspirator
19 Chavez was having: “any trouble finding more ketamine . . . in case
20 this continues with this guy,” noting “I think [we] would be best
21 served not having him look elsewhere” because defendant PLASENCIA
22 wanted to “[b]e his go to.”

23 Overt Act No. 27: On October 4, 2023, Co-Conspirator Chavez
24 sent a text message to defendant PLASENCIA stating he was “working on
25 getting more” ketamine.

26 Overt Act No. 28: On October 4, 2023, to obtain more ketamine
27 to sell to Victim M.P., Co-Conspirator Chavez submitted an order for
28 10 vials of ketamine to Wholesale Ketamine Distributor 2.

1 Overt Act No. 29: On October 4, 2023, to obtain more ketamine
2 to sell to Victim M.P., Co-Conspirator Chavez completed a "Know Your
3 Customer" DEA Questionnaire and submitted it to Wholesale Ketamine
4 Distributor 1, knowing the document contained materially false
5 statements, including Co-Conspirator Chavez responding "No" to the
6 question, "Do you sell any products to other []practitioners?"

7 Overt Act No. 30: On October 6, 2023, in response to Co-
8 Conspirator Iwamasa advising defendant PLASENCIA that he needed more
9 ketamine because he only had "1 left," defendant PLASENCIA traveled
10 to Victim M.P.'s residence and sold one or more vials of ketamine to
11 Co-Conspirator Iwamasa in exchange for cash.

12 **Defendant PLASENCIA Sells Ketamine to Co-Conspirator Iwamasa at**
13 **12:30 a.m. on a Public Street in Santa Monica, California**

14 Overt Act No. 31: On October 7, 2023, Co-Conspirator Iwamasa
15 sent text messages to defendant PLASENCIA seeking more ketamine and
16 asked if he could pay with "something besides cash" because "[i]ts
17 hard to get to the bank on the fly with all that's going on which
18 happens so fast now."

19 Overt Act No. 32: On October 7, 2023, at approximately 11:29
20 p.m., and in response to text messages from Co-Conspirator Iwamasa,
21 defendant PLASENCIA confirmed he had two bottles of ketamine to sell
22 and agreed to meet in Santa Monica, California, stating: "Im at third
23 street promenade now ... If [y]ou would like to meet now."

24 Overt Act No. 33: On October 7, 2023, at approximately 11:47
25 p.m., Co-Conspirator Iwamasa told defendant PLASENCIA that he sent
26 \$3,000 by electronic payment and "im bringing 3 more leaving now."

27 Overt Act No. 34: On October 8, 2023, at approximately 12:30
28 a.m., defendant PLASENCIA met with Co-Conspirator Iwamasa on a street

1 corner in Santa Monica and sold Co-Conspirator Iwamasa ketamine in
2 exchange for \$6,000 in cash.

3 Overt Act No. 35: On October 9, 2023, after Co-Conspirator
4 Chavez received a ketamine delivery from Wholesale Ketamine
5 Distributor 1, Co-Conspirator Chavez sent a text message to defendant
6 PLASENCIA, stating: "Are we still meeting tomorrow[?] We got the
7 Shipment today. One box of 10 vials."

8 Overt Act No. 36: On October 9, 2023, in response to the text
9 message referenced in Overt Act No. 35, defendant PLASENCIA stated:
10 "Great. Yes. I'm going to probably come to you[] mid day."

11 **Defendant PLASENCIA Injects Victim M.P. with Ketamine in a Parking**
12 **Lot in Long Beach, California**

13 Overt Act No. 37: On October 10, 2023, defendant PLASENCIA met
14 with Co-Conspirator Chavez in Irvine, California and purchased 10
15 vials of ketamine which defendant PLASENCIA intended to sell to
16 Victim M.P.

17 Overt Act No. 38: On October 10, 2023, in text messages,
18 defendant PLASENCIA and Co-Conspirator Iwamasa agreed to meet in Long
19 Beach, California, so that defendant PLASENCIA could transfer more
20 ketamine to Co-Conspirator Iwamasa.

21 Overt Act No. 39: On October 10, 2023, defendant PLASENCIA met
22 Co-Conspirator Iwamasa and Victim M.P. in a public parking lot in
23 Long Beach, California, where defendant PLASENCIA injected Victim
24 M.P. with ketamine while inside of a vehicle. While there, defendant
25 PLASENCIA also provided additional vials of ketamine to Co-
26 Conspirator Iwamasa in exchange for a partial payment, in cash.

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Defendant PLASENCIA Continues to Sell Ketamine to Co-Conspirator Iwamasa and Victim M.P.

Overt Act No. 40: On October 12, 2023, in text messages, Co-Conspirator Iwamasa asked to purchase more ketamine from defendant PLASENCIA and noted he would pay defendant PLASENCIA the money he owed for ketamine that defendant PLASENCIA already provided, as referenced in Overt Act No. 39.

Overt Act No. 41: On October 12, 2023, defendant PLASENCIA traveled to Victim M.P.'s residence in Los Angeles County to sell additional ketamine to Co-Conspirator Iwamasa and Victim M.P., for which Co-Conspirator Iwamasa paid defendant PLASENCIA approximately \$21,500 in cash.



Overt Act No. 42: On October 12, 2023, after defendant PLASENCIA injected Victim M.P. with a large dose of ketamine that caused Victim M.P. to freeze up and his blood pressure to significantly spike, defendant PLASENCIA told Co-Conspirator Iwamasa something to the effect of: "let's not do that again," and

1 nonetheless left additional vials of ketamine with Co-Conspirator
2 Iwamasa for injecting Victim M.P.

3 Overt Act No. 43: On October 13, 2023, in response to a text
4 messages from defendant PLASENCIA asking if Co-Conspirator Chavez
5 would be interested in running a ketamine clinic with him, Co-
6 Conspirator Chavez said: "interesting," and "as long as we are doing
7 things on the up and up we can start ASAP. . . . All done legally
8 without any shady stuff. Having them come to the clinic will insure
9 this."

10 Overt Act No. 44: On October 13, 2023, in response to
11 defendant PLASENCIA's asking "Oh so you dont agree with the method I
12 am currently doing?" Co-Conspirator Chavez stated: "It's not what I
13 think it's what an entity like the California medical board would
14 view it . . . Or the DEA."

15 Overt Act No. 45: On October 24, 2023, despite less than a
16 week earlier telling a patient at his clinic that Victim M.P. was too
17 far gone and spiraling in his addiction, defendant PLASENCIA placed
18 an order for 10 vials of ketamine from Wholesale Ketamine Distributor
19 1 so that defendant PLASENCIA could offer to sell the ketamine to
20 Victim M.P.

21 Overt Act No. 46: On October 27, 2023, in text messages,
22 defendant PLASENCIA offered to sell additional ketamine to Co-
23 Conspirator Iwamasa, stating: "I know you mentioned taking a break. I
24 have been stocking up on the meanwhile. I am not sure when you guys
25 plan to resume but in case its when im out of town this weekend I
26 have left supplies with a nurse of mine," and "I can always let her
27 know the plan. I will be back in town Tuesday."

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2 **Defendant SANGHA and Co-Conspirator Fleming Begin Selling Ketamine to**
3 **Co-Conspirator Iwamasa and Victim M.P.**

4 Overt Act No. 47: On October 10, 2023, Co-Conspirator Iwamasa
5 sent a text message to Co-Conspirator Fleming seeking to purchase
6 ketamine, stating: "How much do you want per bottle and what is the
7 nice tip you want."

8 Overt Act No. 48: On October 10, 2023, in response to the text
9 message referenced in Overt Act No. 47, Co-Conspirator Fleming
10 stated, "perfect- and ill bring to you" and "Getting price now. I
11 need some upfront to pay when I pick up. And rest when I deliver."

12 Overt Act No. 49: On October 10, 2023, using the Signal
13 encrypted messaging application, Co-Conspirator Fleming communicated
14 with defendant SANGHA about obtaining ketamine, stating: "Hi Jas.
15 It's Erik . . . Let me know your addy . . . How many vials do u have
16 availability."

17 Overt Act No. 50: On October 10, 2023, using the Signal
18 encrypted messaging application, Co-Conspirator Fleming and defendant
19 SANGHA communicated about the type and price of the ketamine that
20 defendant SANGHA had available for sale.

21 Overt Act No. 51: On October 10, 2023, in text messages, Co-
22 Conspirator Fleming told Co-Conspirator Iwamasa that he could obtain
23 vials of ketamine for \$300, sent a photograph of ketamine he proposed
24 selling, and requested a \$1,000 brokering fee.

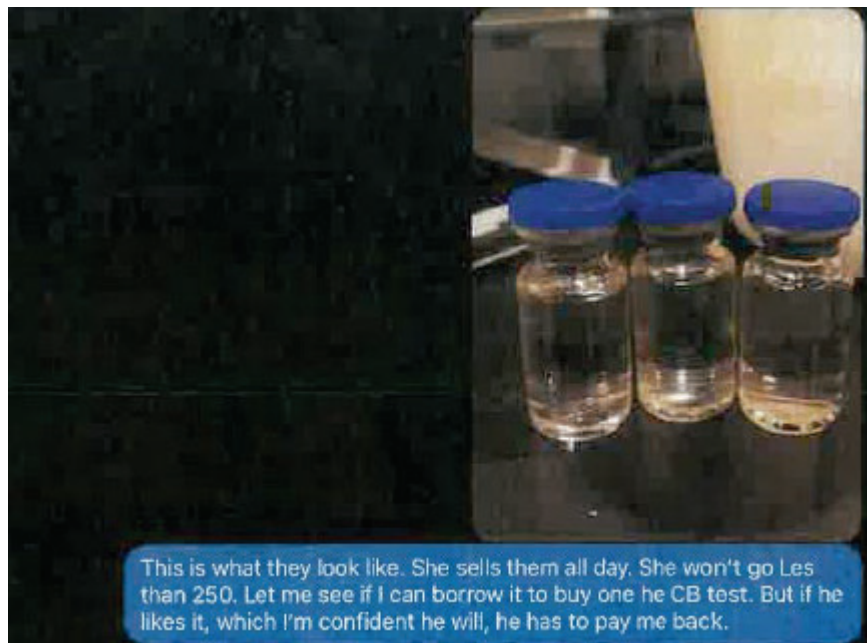
25 Overt Act No. 52: On October 11, 2023, using the Signal
26 encrypted messaging application, defendant SANGHA told Co-Conspirator
27 Fleming that her ketamine was high quality and offered a sample of
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1 the drug for Victim M.P. to try, stating: "It's unmarked but it's
2 amazing - he take one and try it and I have more if he likes."

3 Overt Act No. 53: On October 11, 2023, Co-Conspirator Fleming
4 sent a screenshot of defendant SANGHA's message referenced in Overt
5 Act No. 52 to Co-Conspirator Iwamasa, stating: "[j]ust got this from
6 my person. She only deal[s] with high end and celebs. If it were not
7 great stuff she'd lose her business."

8 Overt Act No. 54: On October 12, 2023, Co-Conspirator Fleming
9 contacted defendant SANGHA to obtain a sample vial of ketamine and
10 advised defendant SANGHA that the ketamine was intended for Victim
11 M.P.

12 Overt Act No. 55: On October 12, 2023, after communicating
13 with defendant SANGHA about her ketamine supply, Co-Conspirator
14 Fleming advised Co-Conspirator Iwamasa that his "hook up," that is,
15 defendant SANGHA, "was able to get the kind that is used for
16 intermuscular . . . I guarantee it's going to be amazing" and sent a
17 photograph of unlabeled, unmarked clear glass vials of ketamine to
18 show Co-Conspirator Iwamasa "what they look like."



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Overt Act No. 56: On October 12, 2023, Co-Conspirator Fleming told Co-Conspirator Iwamasa that he was willing to facilitate the drug deal but needed to make money, stating: "I wouldn't do it if there wasn't a chance of me making some money for doing this."

Overt Act No. 57: On October 13, 2023, Co-Conspirator Fleming drove to the SANGHA Stash House in North Hollywood, California, and purchased a ketamine sample for Victim M.P., which was contained inside an unlabeled, unmarked clear glass vial with a blue cap.

Overt Act No. 58: On October 13, 2023, Co-Conspirator Fleming drove to Victim M.P.'s residence and delivered the sample ketamine vial to Co-Conspirator Iwamasa, knowing that Co-Conspirator Iwamasa would be injecting Victim M.P. with the ketamine.

Defendant SANGHA and Co-Conspirator Fleming Sell 25 Vials of Ketamine on October 14, 2023

Overt Act No. 59: On October 13, 2023, Co-Conspirator Fleming told Co-Conspirator Iwamasa he could obtain how as many vials of ketamine as Co-Conspirator Iwamasa requested, stating: "Let me know how many ... and I'll confirm what she can get. But as of now she said she can fill any order."

Overt Act No. 60: On October 13, 2023, in response to the text messages referenced in Overt Act No. 59, Co-Conspirator Iwamasa told Co-Conspirator Fleming he would purchase "25 vials \$5500 @220 +500 for you for logistics."

Overt Act No. 61: On October 14, 2023, Co-Conspirator Fleming drove to Victim M.P.'s residence located in Los Angeles County and collected cash from Co-Conspirator Iwamasa.

1 Overt Act No. 62: On October 14, 2023, Co-Conspirator Fleming
2 drove to the SANGHA Stash House and purchased 25 vials of ketamine
3 from defendant SANGHA.

4 Overt Act No. 63: On October 14, 2023, after obtaining the
5 ketamine referenced in Overt Act No. 62 from defendant SANGHA, Co-
6 Conspirator Fleming drove back to Victim M.P.'s residence located in
7 Los Angeles County and delivered the ketamine to Co-Conspirator
8 Iwamasa.

9 Overt Act No. 64: On October 23, 2023, Co-Conspirator Iwamasa
10 sent a text message to Co-Conspirator Fleming requesting to purchase
11 more ketamine, stating: "Can we do same as last time again over next
12 2 days?"

13 Overt Act No. 65: On October 23, 2023, in response to the text
14 message referenced in Overt Act No. 64, Co-Conspirator Fleming
15 confirmed he could obtain more ketamine, stating: "It will be same
16 product. You want same amount? Put the 5500 together asap and ill
17 come get it as soon as possible to get it all done tonight."

18 Overt Act No. 66: On October 23, 2023, Co-Conspirator Fleming
19 traveled to Victim M.P.'s residence and picked up approximately
20 \$6,000 in cash from Co-Conspirator Iwamasa, which would be used to
21 pay defendant SANGHA for additional ketamine.

22 **Defendant SANGHA and Co-Conspirator Fleming Sell Ketamine that Co-**
23 **Conspirator Iwamasa Uses to Inject Victim M.P., Killing Him**

24 Overt Act No. 67: On October 24, 2023, based on information
25 from defendant SANGHA, Co-Conspirator Fleming sent text message
26 updates to Co-Conspirator Iwamasa about the delivery and timing of
27 the ketamine, including stating that defendant SANGHA's ketamine
28 source -- which defendant SANGHA referred to as the "master chef" and

1 "scientist" -- would make the supply available, and that the ketamine
2 was "on its way to our girl," referring to defendant SANGHA.

3 Overt Act No. 68: On October 24, 2023, Co-Conspirator Fleming
4 traveled to the SANGHA Stash House and purchased 25 vials of ketamine
5 from defendant SANGHA in exchange for cash. As part of the
6 transaction, defendant SANGHA included ketamine lollipops as an "add
7 on" for Victim M.P.'s large ketamine order.

8 Overt Act No. 69: On October 24, 2023, Co-Conspirator Fleming
9 traveled to Victim M.P.'s residence with the ketamine referenced in
10 Overt Act No. 68 and delivered to Co-Conspirator Iwamasa.

11 Overt Act No. 70: On October 24, 2023, Co-Conspirator Iwamasa
12 administered at least 6 shots of ketamine to Victim M.P.

13 Overt Act No. 71: On October 25, 2023, defendant SANGHA
14 reached out to Co-Conspirator Fleming about anticipated future
15 transfers of ketamine to Victim M.P., stating: "Please let me know if
16 u think There will be another round because the scientist he'll be
17 gone as well . . . I'll have to know ahead of time to get that sorted
18 out before we leave."

19 Overt Act No. 72: On October 25, 2023, Co-Conspirator Iwamasa
20 administered at least 6 shots of ketamine to Victim M.P.

21 Overt Act No. 73: On October 26, 2023, Co-Conspirator Iwamasa
22 administered at least 6 shots of ketamine to Victim M.P.

23 Overt Act No. 74: On October 27, 2023, Co-Conspirator Iwamasa
24 administered at least 6 shots of ketamine to Victim M.P.

25 Overt Act No. 75: On October 28, 2023, using syringes provided
26 by defendant PLASENCIA, Co-Conspirator Iwamasa injected Victim M.P.
27 with at least 3 shots of the ketamine Co-Conspirator Iwamasa received
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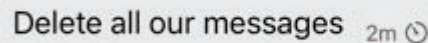
1 from Co-Conspirator Fleming and defendant SANGHA, which resulted in
2 the death and serious bodily injury of Victim M.P.

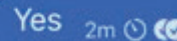
3 **Defendant SANGHA Directs Co-Conspirator Fleming To Delete Evidence**
4 **After Learning About Victim M.P.'s Death**

5 Overt Act No. 76: On October 28, 2023, after she learned about
6 Victim M.P.'s death from news reports, defendant SANGHA called Co-
7 Conspirator Fleming using the Signal application to discuss the co-
8 conspirators distancing themselves from selling ketamine to Victim
9 M.P. by, among other things, deleting digital evidence on their cell
10 phones.

11 Overt Act No. 77: On October 28, 2023, defendant SANGHA
12 updated the setting on the Signal application to automatically delete
13 her messages with Co-Conspirator Fleming and instructed Co-
14 Conspirator Fleming, "Delete all our messages."

15  🤖 Jas set disappearing message time to 1 hour.

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21 Overt Act No. 78: On October 30, 2023, using the Signal
22 encrypted messaging application, Co-Conspirator Fleming sent the
23 following text message to defendant SANGHA: "Please call . . . Got
24 more info and want to bounce ideas off you. I'm 90% sure everyone is
25 protected. I never dealt with [Victim M.P.]. Only his Assistant. So
26 the Assistant was the enabler. Also they are doing a 3 month tox
27 screening ... Does K stay in your system or is it immediately flushed
28 out[?]"

COUNT TWO

[21 U.S.C. § 856(a)(1)]

[DEFENDANT SANGHA]

Beginning on a date unknown, but not later than in or around June 14, 2019, and continuing to March 19, 2024, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," knowingly opened, leased, rented, used, and maintained a place, that is, the SANGHA Stash House located in North Hollywood, California, for the purpose of manufacturing, storing, and distributing controlled substances, including methamphetamine, a Schedule II controlled substance, and ketamine, a Schedule III controlled substance.



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COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i); 18 U.S.C. § 2(b)]

[DEFENDANT SANGHA]

On or about August 26, 2019, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," knowingly and intentionally distributed, and willfully caused to be distributed, ketamine, a Schedule III controlled substance.

COUNTS FOUR THROUGH TEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i)]

[DEFENDANT PLASENCIA]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant SALVADOR PLASENCIA, also known as "Dr. P," while acting and intending to act outside the usual course of professional practice and without a legitimate medical purpose, knowingly and intentionally distributed ketamine, a Schedule III controlled substance:

Count	Date
FOUR	9/30/23
FIVE	10/2/23
SIX	10/4/23
SEVEN	10/6/23
EIGHT	10/8/23
NINE	10/10/23
TEN	10/12/23

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COUNT ELEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i); 18 U.S.C. § 2(a)]

[DEFENDANT SANGHA]

On or about October 13, 2023, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," and others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and intentionally distributed ketamine, a Schedule III controlled substance.

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COUNT TWELVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i); 18 U.S.C. § 2(a)]

[DEFENDANT SANGHA]

On or about October 14, 2023, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," and others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and intentionally distributed ketamine, a Schedule III controlled substance.

COUNT THIRTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i); 18 U.S.C. § 2(a)]

[DEFENDANT SANGHA]

On or about October 24, 2023, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," and others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and intentionally distributed ketamine, a Schedule III controlled substance, the use of which resulted in the death and serious bodily injury of Victim M.P. on or about October 28, 2023.

COUNT FOURTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i)]

[DEFENDANT SANGHA]

On or about March 18, 2024, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," knowingly and intentionally distributed ketamine, a Schedule III controlled substance.

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COUNT FIFTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

[DEFENDANT SANGHA]

On or about March 19, 2024, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," knowingly and intentionally possessed with intent to distribute at least 500 grams, that is, approximately 1,409.7 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(E)(i)]

[DEFENDANT SANGHA]

On or about March 19, 2024, in Los Angeles County, within the Central District of California, defendant JASVEEN SANGHA, also known as the "Ketamine Queen," knowingly and intentionally possessed with intent to distribute ketamine, a Schedule III controlled substance.

COUNT SEVENTEEN

[18 U.S.C. § 1519]

[DEFENDANT PLASENCIA]

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4 On or before February 27, 2024, in Los Angeles County, within
5 the Central District of California, and elsewhere, defendant SALVADOR
6 PLASENCIA, also known as "Dr. P," knowingly altered and falsified a
7 document and record with the intent to impede, obstruct, and
8 influence the investigation and proper administration of a matter
9 within the jurisdiction of the United States, and in relation to and
10 in contemplation of such matter. Specifically, in response to a
11 legal request to produce documents, defendant PLASENCIA provided a
12 falsified document purportedly showing the medical treatment plan for
13 Victim M.P. that included a list of specific medical services
14 provided and maximum dose of the ketamine defendant PLASENCIA
15 purportedly provided: "(Max dose / 24 hr 60 mg)," when in fact, as
16 defendant PLASENCIA then well knew, defendant PLASENCIA injected
17 Victim M.P. with ketamine dosages far in excess of 60 milligrams, and
18 Victim M.P. did not agree to purchase the listed medical treatments
19 and instead agreed to purchase bottles of ketamine from defendant
20 PLASENCIA.

COUNT EIGHTEEN

[18 U.S.C. § 1519]

[DEFENDANT PLASENCIA]

1 On or before March 1, 2024, in Los Angeles County, within the
2 Central District of California, and elsewhere, defendant SALVADOR
3 PLASENCIA, also known as "Dr. P," knowingly altered and falsified
4 documents and records with the intent to impede, obstruct, and
5 influence the investigation and proper administration of a matter
6 within the jurisdiction of the United States, and in relation to and
7 in contemplation of such matter. Specifically, in response to a
8 legal request to produce documents, defendant PLASENCIA provided
9 falsified and altered treatment notes for Victim M.P., including the
10 following: in all notes, defendant PLASENCIA failed to document
11 transfers of ketamine for self-administration, when in fact, as
12 defendant PLASENCIA well knew, he sold ketamine to Co-Conspirator
13 Kenneth Iwamasa and/or Victim M.P. for self-administration at least
14 seven times in September and October of 2023; in notes dated October
15 1, 2023, defendant PLASENCIA claimed that "P[atient] adamant I leave
16 ketamine solution for later use . . . Informed pt. that he should be
17 monitored by physician when undergoing treatment as a safety measure.
18 Empty vials of used solution may have been placed in waste bin," when
19 in fact, as defendant PLASENCIA then well knew, defendant PLASENCIA
20 offered to leave ketamine vials with Victim M.P. and did, in fact, do
21 so on or about September 30, 2023; in notes dated October 7, 2023,
22 defendant PLASENCIA claimed that "P[atient] scheduled to meet for
23 treatment session but was not present," when in fact, as defendant
24 PLASENCIA well knew at the time, defendant PLASENCIA arranged to meet
25 Co-Conspirator Iwamasa without Victim M.P. present at around midnight
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1 on October 7, 2023 to sell Co-Conspirator Iwamasa ketamine in
2 exchange for \$6,000, and that meeting did, in fact, occur, on a
3 public street in Santa Monica, California, at approximately 12:30
4 a.m. on October 8, 2023.

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FORFEITURE ALLEGATION

[21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853, in the event of any defendant's
7 conviction of the offenses set forth in any of Counts One through
8 Sixteen of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting or derived from, any proceeds which
13 the defendant obtained, directly or indirectly, from any such
14 offense;

15 (b) All right, title and interest in any and all property,
16 real or personal, used, or intended to be used, in any manner or
17 part, to commit, or to facilitate the commission of any such offense;
18 and

19 (c) All right, title, and interest in any firearm or
20 ammunition involved in or used in any such offense; and

21 (d) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a), (b), and (c).

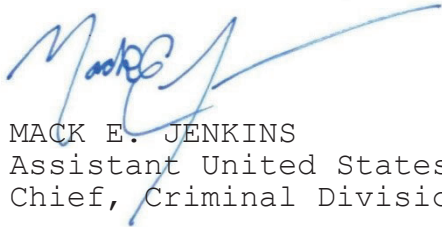
24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 the defendant, if so convicted, shall forfeit substitute property if,
26 by any act or omission of the defendant, the property described in
27 the preceding paragraph, or any portion thereof: (a) cannot be
28 located upon the exercise of due diligence; (b) has been transferred,

1 sold to, or deposited with a third party; (c) has been placed beyond
2 the jurisdiction of the court; (d) has been substantially diminished
3 in value; or (e) has been commingled with other property that cannot
4 be divided without difficulty.

5
6 A TRUE BILL

7
8 /s/
9 Foreperson

10 E. MARTIN ESTRADA
United States Attorney

11 
12
13 MACK E. JENKINS
Assistant United States Attorney
14 Chief, Criminal Division

15 SCOTT M. GARRINGER
Assistant United States Attorney
16 Deputy Chief, Criminal Division

17 IAN V. YANNIELLO
Assistant United States Attorney
18 Chief, General Crimes Section

19 HAOXIAOHAN CAI
Assistant United States Attorney
20 Major Frauds Section