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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT GENE RAND,

Defendant.

Case No. 3:16-CR-00029-MMD-WGC

SUPERSEDING INDICTMENT FOR VIOLATIONS OF:

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(1)(E), and 846; 21 C.F.R. § 1306.04 – Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (Count 1)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04 – Distribution of a Controlled Substance (Counts 2 to 7)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04 – Distribution of a Controlled Substance Resulting in Serious Bodily Injury or Death (Counts 8 and 9)

THE GRAND JURY CHARGES THAT:

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COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances –
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(1)(E), and 846; 21 C.F.R. § 1306.04)

Beginning on an unknown date, but not later than on or about November 13, 2012, and
continuing to on or about April 28, 2016, in the State and District of Nevada, and elsewhere,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally combined, conspired, confederated and
agreed with “R.W.” and “O.A.,” and with others known and unknown, to distribute and possess
with intent to distribute controlled substances, including but not limited to oxycodone, a Schedule
II controlled substance, and hydrocodone, a Schedule III controlled substance, in violation of 21
U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(1)(E), and 846, and 21 C.F.R. § 1306.04.

COUNT TWO

(Distribution of a Controlled Substance –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04)

Between on or about February 10, 2011, and on or about April 9, 2016, in the State and
District of Nevada,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “R.W.,” in violation of 21 U.S.C. §§
841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04.

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COUNT THREE

(Distribution of a Controlled Substance –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04)

Between on or about September 9, 2012, and on or about March 10, 2016, in the State and
District of Nevada,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “O.A.,” in violation of 21 U.S.C. §§
841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT FOUR

(Distribution of a Controlled Substance –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04)

Between on or about March 22, 2013, and on or about October 22, 2015, in the State and
District of Nevada,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “S.H.,” in violation of 21 U.S.C. §§
841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04.

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COUNT FIVE

(Distribution of a Controlled Substance –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04)

Between on or about July 2, 2013, and on or about April 25, 2016, in the State and District
of Nevada,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “C.J.,” in violation of 21 U.S.C. §§
841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT SIX

(Distribution of a Controlled Substance –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04)

Between on or about August 19, 2014, and on or about September 25, 2015, in the State
and District of Nevada,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “E.U.,” in violation of 21 U.S.C. §§
841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04.

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COUNT SEVEN

(Distribution of a Controlled Substance –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 C.F.R. § 1306.04)

Between on or about January 21, 2016, and on or about April 2, 2016, in the State and
District of Nevada,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “R.S.,” in violation of 21 U.S.C. §§
841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT EIGHT

(Distribution of a Controlled Substance Resulting in Serious Bodily Injury or Death –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04)

Beginning at an unknown date, but not later than on or about October 2, 2015, in the State
and District of Nevada,

ROBERT GENE RAND,

defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “M.Y.,” the use of such oxycodone
resulting in serious bodily injury and death of “M.Y.,” in violation of 21 U.S.C. §§ 841(a)(1) and
841(b)(1)(C), and 21 C.F.R. § 1306.04.

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COUNT NINE

(Distribution of a Controlled Substance Resulting in Serious Bodily Injury or Death –
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 21 C.F.R. § 1306.04)

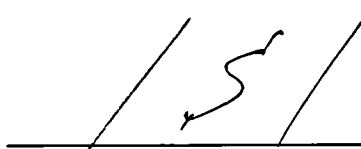
Beginning at an unknown date, but not later than on or about August 12, 2015, in the State
and District of Nevada,

ROBERT GENE RAND,

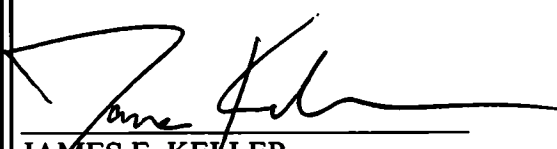
defendant herein, then a physician licensed to practice medicine in the State of Nevada, while
acting and intending to act outside the usual course of professional practice and without a
legitimate medical purpose, knowingly and intentionally distributed a controlled substance;
namely, oxycodone, a Schedule II controlled substance; to “D. C.-Z.,” the use of such oxycodone
resulting in serious bodily injury and death of “D. C.-Z.,” in violation of 21 U.S.C. §§ 841(a)(1)
and 841(b)(1)(C), and 21 C.F.R. § 1306.04.

DATED this 21st day of June, 2017.

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

STEVEN W. MYHRE
Acting United States Attorney


JAMES E. KELLER
SHANNON M. BRYANT
Assistant United States Attorneys