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THE STATE OF TEXAS
VS.
HASAN KASSIM GOKAL
7103 TIEDMANN PARK WAY
SUGAR LAND TX 77479

SPN: 03082401
DOB: A M 12/05/1972
DATE PREPARED: 01/21/2021

D.A. LOG NUMBER: 2706778
CJIS TRACKING NO.:
AGENCY:DAO
O/R NO: PC210001
ARREST DATE: TO BE

NCIC CODE: 2399 66
MISDEMEANOR CHARGE: THEFT

RELATED CASES:

CAUSE NO: 2342372
HARRIS COUNTY CRIMINAL COURT AT LAW NO: 8
FIRST SETTING DATE:

COURT ORDERED BAIL: TO BE SET AT
MAGISTRATION
PRIOR CAUSE NO:
CHARGE SEQ NUM: 1

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, HASAN KASSIM GOKAL, hereafter styled the Defendant, heretofore on or about December 29, 2020, did then and there unlawfully, while a public servant, namely an employee of Harris County Public Health appropriate, by acquiring and otherwise exercising control over property, namely, nine doses of the Moderna Covid vaccine owned by Michael McClendon, hereafter styled the Complainant, of the value of at least one hundred dollars but less than seven hundred fifty dollars, with the intent to deprive the Complainant of that property, and said property came into the Defendant's custody, possession and control by virtue of the Defendant's status as a public servant.

Probable Cause

Affiant has reason to believe and does believe that on December 29, 2020, Dr. Hasan Gokal, hereinafter referred to as Defendant, committed the offense of Theft by a Public Servant (\$100.00-\$750.00). The Affiant believes that the Defendant appropriated at least one vial of the Moderna COVID-19 vaccine that belonged to the Office of Harris County Public Health from the vaccination distribution site located at the Lyndsay Lyons Park at 2310 Atascocita Road, Humble, Harris County, Texas with the intent to deprive the Office of Harris County Public Health of the property. The Affiant reviewed the Defendant's employment records and found that the Defendant was a Public Servant, employed as a medical physician for the Office of Harris County Public Health, at the time that he took the vial.

Affiant spoke with Harris County Public Health employee Alison Hare, Community Resilience Officer, who advised that on January 6, 2021, the Defendant told her that he had taken a punctured vial of the Moderna vaccine that had 10 remaining doses in it at the end of operations and that he took the vial offsite and vaccinated his friends and family. Ms. Hare advised that the Office of Public Health has existing protocols in place so that no doses are "wasted" at the end of the day.

Affiant spoke with Harris County Public Health employee Jennifer Kiger, Chief of the Office of Harris County Public Health Preparedness & Response, who advised that Ms. Hare informed her of the conversation that she had with the Defendant and she immediately became concerned. Ms. Kiger spoke of a previous situation in which an H1N1 vaccine was mishandled in years past and that the department lost funding at that time due to the mishandling. Harris County has taken measures to ensure that the proper protocols of administering the vaccine are followed to ensure all doses are administered. Ms. Kiger stated that once she learned of the Defendant taking the vial off site and administering it out of county, she immediately notified Michael McClendon, Director of the Office of Harris County Public Health, hereinafter referred to as the Complainant. Ms. Kiger and the Complainant notified Harris County Public Health administrators of the situation and they began an internal investigation. Ms. Kiger stated that the breach of protocol in administering the vaccination was reported to the Texas Department of State Health Services (DSHS). Ms. Kiger stated that anyone who is administered the COVID-19 vaccination is automatically signed up to receive the second dose of the vaccination. Harris County keeps track of the individuals who received the first dose of the vaccination by gathering patient information on a COVID-19 Vaccination Form for Moderna and Pfizer. These forms are filled out at the time an individual receives the vaccine if the individual did not register online. Ms. Kiger obtained all of the handwritten patient forms from the Lyndsay Lyons Park at 2310 Atascocita Road, Humble, Harris County, Texas, which contained the Defendant's signature on them and that she believed may have belonged to patients that were given the vaccine on site as well as offsite. Ms. Kiger stated that she gave the forms to Edward Anderson.

Affiant spoke with Edward Anderson, the Director of Human Resources for Harris County Public Health, who advised that he was in charge of the internal investigation. Mr. Anderson advised that due to the seriousness of the situation it was quickly determined that the Defendant was to be terminated. Mr. Anderson stated that when he and the Complainant met with the Defendant, the Defendant admitted to taking one vial of the

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vaccine that still contained 10 doses and vaccinating individuals offsite.

Affiant spoke to the Complainant who stated that the Defendant was a county employee at the time that he took the vaccine offsite and vaccinated his family and friends. The Complainant advised that the Defendant was the medical advisor for the COVID-19 response which allowed him to have access to the vials of vaccine. The Complainant explained that any vials that had been punctured and still contained viable doses of the vaccine were supposed to be brought back to the main office. The Complainant stated that Harris County Public Health personnel are not permitted to take vaccine doses home for personal use. The Complainant further advised that Harris County Public Health has a procedure in place to make sure that leftover doses at the end of each shift are administered to at-risk front line workers including healthcare workers, firefighters, and police. A secondary waiting list exists expressly for the purpose ensuring that every vaccine dose allotted to Harris County Public Health is administered to the intended recipients and not wasted.


Affiant obtained a copy of the 15 handwritten COVID-19 Vaccination Forms that had been identified during the internal investigation from the Complainant. Affiant was able to make contact with several of the patients or their family members and found that 8 individuals were given the vaccine offsite, out-of-county and after hours by Dr. Gokal. Dr. Gokal's wife is also believed to have been given the vaccine offsite for a total of 9 doses that were taken from the Office of Public Health without permission and administered to Dr. Gokal's friends and family.

Affiant was able to obtain a value for the Moderna Covid 19 Vaccine from Moderna Legal Department representative Neal Dahiya. Mr. Dahiya advised that each dose at the time of the theft cost \$15.00 each for a total of \$135.00.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

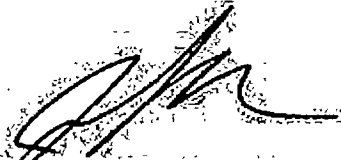
Signed and sworn by me on 1/21/2021

Duly attested by me on 01.21.2021



AFFIANT

Assistant District Attorney
Harris County District Attorney's Office
TBC No. 00792733



Witness (Peace Officer)

Joseph Gonzales #146
Witness Printed name & Badge or Payroll number

Probable Cause found 1-21-2021 Capias to issue

Colin Amann
Magistrate, Harris County, Texas

COMPLAINT

COPY OF COMPLAINT/WARRANT DELIVERED TO
Officer's name: J.M.V. Cook
Police agency: H.C.D.A.O.
Date: 1-21-2021 date/time: 14:50