### Case 1:20-cr-00100-LMB Document 7 Filed 05/04/20 Page 1 of 4 PageID# 11

# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

FILED IN OPEN COURT MAY - 4 2000 CLERK, U.S. DISTRICT COURT ALEXANDRIA, VIRGINIA

Alexandria Division

))

)

))

)

)

UNITED STATES OF AMERICA

v.

FELICIA LYN DONALD,

Defendant.

Case No. 1:20-CR-100

Hon. Leonie M. Brinkema

# **CRIMINAL INFORMATION**

# COUNT 1

(Conspiracy to Distribute and Dispense Schedule II Controlled Substances Outside the Usual Course of Professional Practice and Without a Legitimate Medical Purpose)

THE UNITED STATES ATTORNEY CHARGES THAT:

From at least in or around April 2016 and continuing to in or around April 2020, both dates being approximate, in the Eastern District of Virginia, the defendant FELICIA LYN DONALD, did unlawfully, knowingly, and intentionally conspire with at least five other individuals to distribute and dispense, and to cause to be distributed and dispensed, Schedule II controlled substances, including oxycodone, hydrocodone, morphine sulfate and methadone, outside the usual course of professional practice and without a legitimate medical purpose, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

(In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846).

Case 1:20-cr-00100-LMB Document 7 Filed 05/04/20 Page 2 of 4 PageID# 12



#### COUNT 2

### (Health Care Fraud)

# THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From at least in or around November 2016 and continuing to at least August 2019, in the Eastern District of Virginia, the defendant FELICIA LYN DONALD, engaged in a scheme to bill the Virginia Medicaid Program for services that were not provided, including established patient visits and gynecological services.

For example, on April 20, 2019, in the Eastern District of Virginia, the defendant FELICIA LYN DONALD, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in 18 U.S.C. § 24(b), that is the Virginia Medicaid Program, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody of the Virginia Medicaid Program in connection with the delivery of and payment for health care benefits, items and services by billing for services not rendered and DONALD knew that the sole purpose of B.N.'s visit to DONALD's office was for B.N. to unlawfully obtain prescription opioids that B.N. could illegally distribute on the street for profit.

Count	Patient	Description of the Item Billed	On or About Service Date	Approximate Amount Billed	False/Fraudulent Representation
2	B.N.	Established Patient Visit	4/20/2019	\$140.00	Billing for services not rendered

(In violation of Title 18, United States Code, Section 1347).

Respectfully submitted,

G. Zachary Terwilliger United States Attorney

By:

Raj Parekh Monika Moore Assistant United States Attorneys