

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

Alexandria Division

UNITED STATES OF AMERICA

v.

DANIEL TYLER WALKER

Defendant.

No. 1:20-cr-234

Count 1: Conspiracy to Receive Health
Care Kickbacks (18 U.S.C. § 371)

Forfeiture Notice

Criminal Information

THE UNITED STATES ATTORNEY CHARGES THAT:

General Allegations

At all times material to this Criminal Information:

1. The defendant, DANIEL TYLER WALKER (“WALKER”), worked as a medical sales specialist for Pharmaceutical Company A, which is headquartered within the Eastern District of Virginia.
2. WALKER was responsible for marketing a naloxone auto-injector device that Pharmaceutical Company A developed and used for the treatment of opioid emergencies.
3. Royal Care Pharmacy (“Royal Care”) was located in Fairfax, Virginia, within the Eastern District of Virginia. Royal Care was owned and operated by MOHAMED ABDALLA (“ABDALLA”), a pharmacist licensed in the Commonwealth of Virginia since in or around May 2008. Royal Care filled prescriptions for patients’ medications provided through various sources. ABDALLA further used Royal Care to conduct business on behalf of MEDEX Health Group (“MEDEX”).

4. In addition to Royal Care, ABDALLA operated two additional pharmacies— Millennium Pharmacy (Falls Church) and Pharmacy at Great Falls (Great Falls)—within the Eastern District of Virginia.

5. MOHAMMED TARIQ AMIN (“AMIN”) was a licensed pharmacy technician in the Commonwealth of Virginia since in or around March 2007. From on or about November 20, 2014, to on or about November 7, 2018, AMIN served as Royal Care’s general manager and was responsible for overseeing, controlling, and managing the day-to-day operations of the pharmacy.

6. Medicare, Virginia Medicaid, and Maryland Medicaid, and TRICARE are federal health care programs funded directly, in whole or in part, by the United States Government, or a state health care program, as defined by Title 42, United States Code, Section 1320a-7b(f). Medicare, Virginia Medicaid, Maryland Medicaid, and Tricare are also federal health care programs as defined by Title 18, United States Code, Section 24(b).

Count One

(Conspiracy to Receive Health Care Kickbacks)

7. The General Allegations are re-alleged and incorporated by reference.

8. From at least in or around August 2016 and continuing until at least in or around February 2018, in the Eastern District of Virginia and elsewhere, WALKER knowingly and willfully did combine, conspire, confederate and agree with ABDALLA, AMIN, and others, known and unknown, to commit the following offense against the United States, that is, the violation of Title 42, United States Code, Section 1320a-7b(b)(1)(A), by knowingly and willfully offering and paying remuneration, including kickbacks and bribes, directly and indirectly, overtly and covertly, in cash and in kind to induce WALKER to direct health care providers and other individuals to refer patients to and fill prescriptions through Royal Care for the furnishing of items and services for which payment may be made in whole or in part under, Medicare, Virginia Medicaid, and Maryland Medicaid, federal health care programs.

Purpose of the Conspiracy

9. It was the purpose of the conspiracy for WALKER and his conspirators, including AMIN and ABDALLA, to pay kickbacks to WALKER in exchange for referring and directing health care providers and other individuals to have prescriptions for certain drugs, namely the naloxone auto-injector device, filled through Royal Care, all for the benefit and enrichment of the co-conspirators.

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, WALKER and his co-conspirators committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

10. In or around August 2016, WALKER and his conspirators entered into an agreement whereby Royal Care would compensate WALKER 25 percent of all net sales of every prescription of this naloxone auto-injector device directed to and filled by Royal Care.

11. Consistent with this agreement, in or around August 2017, ABDALLA, AMIN, within the Eastern District of Virginia, submitted and caused to be submitted claims for the naloxone auto-injector device to several federal health care programs, namely Medicare, Virginia Medicaid, and Maryland Medicaid, which paid Royal Care approximately \$813,810.98.

12. During the conspiracy, from on or about August 1, 2016, through on or about February 28, 2018, Royal Care, Millennium, and Great Falls received payments of about \$9,928,261.62 from Medicare, Virginia Medicaid, Maryland Medicaid, and Tricare for claims submitted from within the Eastern District of Virginia for prescriptions for the naloxone auto-injector device as a result of prescriptions directed to Royal Care pursuant to the kickback relationship with WALKER. Royal Care, Millennium, and Great Falls profited approximately \$1,202,676.27 from these prescriptions for this naloxone auto-injector device.

13. WALKER received at least \$573,558 from ABDALLA in exchange for prescriptions for the naloxone auto-injector device Royal Care filled. In addition, from in or around October 2017 through in or around September 2018, ABDALLA made additional payments of approximately \$132,347 through a company controlled by AMIN in exchange for

prescriptions for the naloxone auto-injector device Royal Care filled. WALKER received at least \$98,232 of these payments from AMIN.

(All in violation of Title 18, United States Code, Section 371)

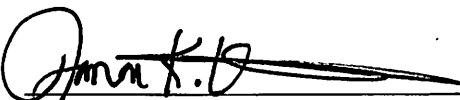
Forfeiture Notice

Defendant DANIEL TYLER WALKER is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of the single offense set forth in this Criminal Information, he shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the violation.

Pursuant to 21 U.S.C. § 853(p), defendant DANIEL TYLER WALKER shall forfeit substitute property, if, by any act or omission of defendant DANIEL TYLER WALKER, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(All in accordance with Title 18, United States Code, Sections 982(a)(7) and Fed. R. Crim. P. 32.2.)

G. Zachary Terwilliger
United States Attorney

By: 
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Assistant United States Attorneys