

Sealed

Public and unofficial staff access
to this instrument are
prohibited by court order

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

June 03, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

**ANDRE WILLIAMS and
MONIQUE WASHINGTON, a/k/a
MONIQUE JOHNSON,**

Defendants.

§
§
§
§
§
§
§
§
§
§
§

**Criminal No. 4:25-cr-00289
UNDER SEAL**

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times material to this Indictment, unless otherwise specified:

1. The Controlled Substances Act (“CSA”) governed the manufacture, distribution, and dispensing of controlled substances in the United States. With limited exceptions for medical professionals, the CSA made it unlawful for any person to knowingly or intentionally manufacture, distribute, or dispense a controlled substance or conspire to do so.

2. The CSA and its implementing regulations set forth which drugs and other substances were defined by law as “controlled substances,” and assigned those controlled substances to one of five schedules (Schedule I, II, III, IV, or V) depending on their potential for abuse, likelihood of physical or psychological dependency, accepted medical use, and accepted safety for use under medical supervision.

3. A controlled substance assigned to “Schedule II” meant that the drug had a high potential for abuse and a currently accepted medical use in treatment in the United States, or the drug had a currently accepted medical use with severe restrictions.

4. Pursuant to the CSA and its implementing regulations:

- a. Hydrocodone was classified as a Schedule II controlled substance. Hydrocodone was used to treat severe pain. Hydrocodone, as with other opioids, was highly addictive. Tablets combining 10 mg of hydrocodone bitartrate and 325 mg of acetaminophen (“hydrocodone 10-325 mg”) was sometimes marketed under the brand name Norco. The 10-325 mg pill was the highest, short-acting combination-pill form of the drug commercially available, and it had substantial street value and was in high demand on the Houston area’s black market.
- b. Oxycodone was classified as a Schedule II controlled substance. Oxycodone was used to treat severe pain. Oxycodone, as with other opioids, was highly addictive. The highest-strength short-acting oxycodone pill commercially available—and the one most in demand on the Houston area’s black market—contained 30 mg of oxycodone hydrochloride.
- c. Carisoprodol, a Schedule IV drug classified as a muscle relaxant; alprazolam, a Schedule IV drug used to treat anxiety; and promethazine with codeine syrup, a Schedule V drug used as a cough suppressant had substantial street value and were in high demand on the Houston area’s black market. Together, carisoprodol 350 mg, alprazolam 2 mg, and promethazine with codeine are the “Potentiators,” so-called because they enhanced the high from opioids like hydrocodone and oxycodone

5. With exceptions not applicable here, only appropriately licensed and registered pharmacies could distribute or dispense controlled substances, and only pursuant to legitimate prescriptions issued by a medical practitioner in the usual course of his professional practice. *See* 21 C.F.R. §§ 1306.04 and 1306.06. The issuing physician and the pharmacist who filled the prescription for a controlled substance shared a

corresponding responsibility for its proper prescribing and dispensing. *See* 21 C.F.R. § 1306.04. In addition, Section 1306.04 instructed that:

[a]n order purporting to be a prescription issued not in the usual course of professional treatment . . . is not a prescription within the meaning and intent of Section 309 of the Act (21 U.S.C. § 829) and the person knowingly filling such a purported prescription, as well as the person issuing it, shall be subject to the penalties provided for violations of the provisions of law relating to controlled substances.

6. Under the CSA, it was unlawful for individuals to knowingly or intentionally distribute and dispense controlled substances via a pharmacy in a manner unauthorized by law; that is, without a legitimate medical purpose or outside the usual course of professional practice.

DEFENDANTS AND RELEVANT ENTITIES AND INDIVIDUALS

7. ServMed was a was a pharmacy licensed by the Texas State Board of Pharmacy (“TSBP”) and registered with the Drug Enforcement Administration (“DEA”) to dispense controlled substances, but only in a manner authorized by law. ServMed was located at 307 S Friendswood Drive, Ste D-1, Friendswood, Texas 77546, in the Southern District of Texas. ServMed operated as a “front pharmacy,” meaning it was established and maintained only to obtain controlled substances from pharmaceutical wholesalers to be diverted onto the black market.

8. Defendant **ANDRE WILLIAMS** facilitated sales onto the black market of the controlled substances acquired under ServMed’s license and registration, and he supervised and directed ServMed’s only employee (“Person 1”).

9. Defendant **MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, was registered as ServMed's owner with TSBP and DEA. **MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, opened and maintained a bank account in ServMed's name, from which she withdrew funds and financed personal affairs.

COUNT ONE
Conspiracy to Unlawfully Distribute and Dispense Controlled Substances
(21 U.S.C. § 846)

10. Paragraphs 1 through 9 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

11. From in or around August 2023, and continuing through in or around March 2025, the exact dates being unknown to the Grand Jury, in the Houston Division of the Southern District of Texas, and elsewhere, Defendants,

ANDRE WILLIAMS and
MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON,

knowingly and intentionally combined, conspired, confederated, and agreed with each other, with Person 1, and with others known and unknown to the Grand Jury, to violate Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), that is, to knowingly and intentionally distribute and dispense mixtures and substances containing a detectable amount of Schedule II controlled substances, including hydrocodone and oxycodone, while knowing that such distribution and dispensing was unauthorized.

Continued on next page...

Purpose of the Conspiracy

12. It was the purpose of the conspiracy for **ANDRE WILLIAMS and MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, Person 1, and their co-conspirators, known and unknown to the Grand Jury, to unlawfully enrich themselves by, among other things: (a) unlawfully distributing and dispensing hydrocodone, oxycodone, and the Potentiators; (b) generating large profits from the unlawful sale of these controlled substances; and (c) diverting the proceeds from the unlawful sales for the personal use and benefit of **ANDRE WILLIAMS, MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, Person 1, and their co-conspirators.

Manner and Means of the Conspiracy

The manner and means by which **ANDRE WILLIAMS, MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, Person 1, and others, known and unknown to the Grand Jury, sought to accomplish the purpose and object of the conspiracy included, among other things:

13. **MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, maintained a Texas Pharmacy License from TSBP and a registration with DEA for ServMed.

14. **ANDRE WILLIAMS and MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, recruited Person 1 to transport controlled substances obtained through ServMed, in bulk, to **ANDRE WILLIAMS**, for further distribution onto the Houston area's black market. Person 1 was already familiar with the scheme, having performed the same function for **ANDRE WILLIAMS and MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, in connection with two front

pharmacies that **ANDRE WILLIAMS and MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON** controlled prior to ServMed.

15. **ANDRE WILLIAMS, MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, Person 1, and their co-conspirators held ServMed out to DEA, TSBP, and wholesalers of controlled substances as a legitimate pharmacy operation, when in fact, the pharmacy filled no prescriptions and operated without a licensed pharmacist.

16. **MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, brought to ServMed her existing relationships with sales representatives from complicit wholesalers to help facilitate ServMed's purchases of hydrocodone, oxycodone, and the Potentiators, which **MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON, ANDRE WILLIAMS**, Person 1, and their co-conspirators diverted and caused to be diverted onto the black market.

17. **ANDRE WILLIAMS and MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, were willing to pay wholesalers of controlled pharmaceutical drugs over-market prices for oxycodone 30 mg, hydrocodone 10-325 mg, and the Potentiators; and to purchase non-controlled substances that ServMed did want or intend to dispense, and that ServMed in fact did not dispense—because ServMed could sell and did sell the controlled substances onto the black market for hundreds of dollars, to more than a thousand dollars, in cash, per bottle.

18. **ANDRE WILLIAMS and MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, distributed and caused to be distributed the controlled substances purchased from wholesalers, in bulk, directly to individuals that **ANDRE WILLIAMS**

and **MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, knew illegally trafficked in pharmaceutical controlled substances, and who **ANDRE WILLIAMS and MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, knew would and did then sell the drugs onto the Houston area's black market, without the involvement at any time of physicians, patients, or prescriptions.

19. To avoid scrutiny by TSBP and DEA, **ANDRE WILLIAMS, MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, Person 1, and their co-conspirators also knowingly and intentionally failed to report distributing controlled substances to the relevant authorities, including DEA (to which pharmacy-to-pharmacy distributions of Schedule II and Schedule III narcotic drugs must be reported to DEA's ARCOS database) and the State (to the Prescription Monitoring Program ("PMP"), to which pharmacies must report all controlled substances dispensed to patients).

20. **ANDRE WILLIAMS, MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, Person 1, and their co-conspirators operated ServMed as a cash-only business, and they attempted to deposit cash proceeds in a manner designed to avoid triggering cash reporting requirements imposed upon financial institutions under the law, all to conceal their drug trafficking.

21. In this way, **ANDRE WILLIAMS, MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON**, Person 1, and their co-conspirators caused ServMed to acquire, and to unlawfully distribute, at least approximately 57,000 pills of oxycodone 30 mg, 44,000 pills of hydrocodone 10-325 mg, 70,500 pills of carisoprodol 350 mg, 36,500 pills of alprazolam 2 mg, and 164 pints of promethazine with codeine, said drugs having a street

value of over \$2.8 million, knowing and intending that ServMed would and did distribute the drugs in a manner not authorized by law; *e.g.*, directly onto the black market, for cash.

All in violation of Title 21, United States Code, Section 846.

NOTICE OF CRIMINAL FORFEITURE
(21 U.S.C. § 853)

22. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

23. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, Defendants,

ANDRE WILLIAMS and
MONIQUE WASHINGTON, a/k/a MONIQUE JOHNSON,

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, and intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

24. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

d. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to a money judgment and forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

Original Signature on File

FOREPERSON

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

LORINDA LARYEA, ACTING CHIEF
FRAUD SECTION, CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE

Andrew Pennebaker
DREW PENNEBAKER
TRIAL ATTORNEY
FRAUD SECTION, CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE