

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Melissa Szwanke, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

I make this affidavit in support of a criminal complaint against Eric Strom HOLLAND for drug trafficking and wire fraud. Based on the facts and circumstances laid out in this affidavit, I respectfully submit that there is probable cause to believe that HOLLAND has committed violations of 21 U.S.C. § 841(a)(1), (b)(1)(C) (Distribution and Dispensing of a Controlled Substance) and 18 U.S.C. § 1343 (Fraud by Wire), as more particularly set out in Attachment A.

I am a Diversion Investigator with the Drug Enforcement Administration (DEA) and have been since September 2018. I completed Basic Diversion Investigator training in December 2018. Since that time, I have worked in the Miami Field Division, specifically in the Tactical Diversion Squad since June 2020. During my tenure at DEA, I have completed the following training courses: Prosecuting Diversion Cases, Advanced Diversion Investigator School, Money Laundering, and Asset Forfeiture. As part of the Tactical Diversion squad, I have worked criminal, civil, and regulatory cases involving DEA registrants, including doctors and pharmacies. I am authorized by law to obtain and execute warrants to search and arrest under the authority of the United States and have participated in numerous investigations involving the trafficking of controlled substances. I have experience in interviewing subjects and targets of an investigation, reviewing electronic and other evidence, obtaining data relating to the issuance of prescriptions of controlled

substances, and conducting other activities related to the investigation of drug trafficking.

Because this affidavit is made merely to show that there is probable cause for the requested criminal complaint, it does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

As a general overview of the scheme, HOLLAND would recruit unwitting doctors for his unlicensed pain clinic using a number of lies designed to induce them to work for him and to prescribe controlled substances, including oxycodone. These lies included that the pain clinic had a physical location (when in fact all operations during the pertinent periods were purely virtual), that patients were being physically examined by medical practitioners, such as nurse practitioners, before doctors were asked to prescribe, that there were long-term doctors with whom the patients had a standing relationship and that the temporary doctors were just refilling prescriptions as part of an established regimen of care, and that safeguards to prevent against drug abuse, such as urine screens, were being used. Numerous doctors stated that, had they known that the representations made by HOLLAND about the operation of the clinic were false, they would not have prescribed for him. HOLLAND also committed fraud by wire in violation of 18 U.S.C. § 1343 by engaging doctors to work for him using the above-mentioned falsehoods and falsely claiming that he would pay the doctors for their work. In fact, HOLLAND routinely failed to pay doctors and simply replaced

them with new temporary doctors once they ceased working for him. HOLLAND's fraudulent scheme involved numerous wires in interstate commerce.

General Facts and Investigative Background

Since approximately September 2021, the DEA has been investigating an unlicensed pain clinic (the "Clinic") owned and operated by Eric Strom HOLLAND. The investigation has revealed that the clinic was located at 16970 San Carlos Boulevard, Suite 120, Fort Myers, FL 33908 (the "Physical Clinic Location") until March 2023. Since that time, the Clinic has operated in a virtual setting.

Since approximately May 2023, HOLLAND has recruited multiple doctors to work on a short-term basis under the false pretense that they are covering for a "permanent" doctor who is on vacation or medical leave. HOLLAND has also represented, falsely, that the patients of the recruited doctors have been examined in person by the "permanent" doctor in the recent past, thus providing them with a basis to refill controlled substance prescriptions with minimal patient inquiry via telemedicine.

As part of the scheme, HOLLAND has created the appearance of a legitimate, functioning pain clinic using aliases, spoof email addresses, misleading business documents (*e.g.*, contracts), identity theft, and more, to trick the short-term doctors into believing that their conduct was legitimate and lawful. The investigation has revealed that the typical short-term doctor worked with the clinic for a period of weeks and then disassociated from the practice when HOLLAND refused to pay him or her

for his or her work. HOLLAND then recruited a replacement and continued the scheme.

Eric Holland Biographical Section

Eric Strom HOLLAND, born August 29, 1969, resided at 205 SW 39th Street, Cape Coral, Florida (the “HOLLAND Residence”) from approximately August 2014 to approximately August 2024. A review of the State of Florida Drivers and Vehicle Identification Database (DAVID) lists this as his address beginning on August 20, 2014. Records from Lee County Electric Cooperative confirm Eric HOLLAND as the customer at this address. A subpoena response from Comcast for this address lists Eric HOLLAND as the customer. Investigators confirmed the house was vacated at the end of August 2024. Further investigation has not revealed HOLLAND’s new address.

The following is a summary of names, aliases, email addresses, and business entities found through this affidavit:

Names and Aliases Used

The investigation has revealed the following aliases believed to be used by HOLLAND in connection with his scheme.

- Eric Collins/Strom Collins/Derek Collins
 - HOLLAND is believed to be using these aliases to recruit and communicate with doctors, as well as health care staffing and medical service providers, as part of his scheme. Notably, “Eric”

and “Strom” are taken from HOLLAND’s full name, Eric Strom HOLLAND, as shown by DAVID.

- For example, one temporary Clinic doctor who wrote prescriptions for Clinic patients in early January 2024, corresponded with clinic owner “Derek Collins.” On January 9, 2024, the doctor sent a text message to a number that he understood to be used by Collins, asking, “[t]here is a request to grant a Strom Collins and [Staff Member 1] to prescribe on my behalf. Do you know who these are?” “Derek” responded, “Oh, that’s our front desk girl. You can put no. **Strom Collins is me that’s my middle name** lol . . .” [emphasis added]
- Investigators also interviewed a doctor who physically worked at the Clinic from approximately August 2019 to December 2021. The doctor, who saw HOLLAND consistently at the Clinic, knew him as “Eric Collins.”
- Trife Capone
 - HOLLAND is believed to have used the email address tlcapone@outlook.com to communicate with multiple doctors associated with the Clinic and with medical staffing companies used to find those doctors. The email address is believed to be short for “Trife Capone,” a name at least one doctor remembers as an individual associated with the Clinic.

- Said email address was used to open a virtual P.O. Box at the Pack and Ship store located at 2423 SW 147th Avenue, Miami, Florida 33185. According to records obtained from the store, the customer's name is listed as Eric Holland, with a home address of the HOLLAND Residence.
- Another email of interest in the investigation, [Staff Member 1's Name]12309@mail.com, was registered using the phone number 239-763-4334. The subscriber for that number was listed as Trife Capone, and the number was known to be used by "Eric Collins" by three temporary doctors recruited into the scheme.
- Abe/Abraham/Marty Rosenthal/Rosenthol
 - HOLLAND is believed to use these names in connection with certain business and banking records. For instance, one such name variation has been found listed as the CEO of the Clinic on multiple employment contracts of recruited doctors.

Introduction to Emails Used

During this investigation, investigators have identified the following email addresses which are believed to be used by HOLLAND to carry on the business of the Clinic. Investigators believe these email addresses are controlled and used by HOLLAND as a way of obfuscating his central role in the operation of the Clinic.

1. stromcollins@hotmail.com

- a. A subpoena response from Microsoft Corporation lists Strom Collins as the subscriber.
- b. A subpoena response from Lee County Electric Cooperative for the utilities account at the HOLLAND Residence lists Eric HOLLAND as the customer and stromcollins@hotmail.com as the contact email.
- c. A subpoena response from Busey Bank listed three accounts owned by HOLLAND, listing his date of birth, social security number, and home address. One of these accounts was a personal account and two were business accounts for Medical Professionals of SWFL. All accounts listed stromcollins@hotmail.com as the contact email.

2. tlcapone@outlook.com

- a. This email was used to open the P.O. Box at the Pack and Ship store located at 2423 SW 147th Avenue, Miami, FL 33185. The owner of the box was Eric HOLLAND, listing the HOLLAND Residence in the contact information.

3. dr.[Physician 1 Name]md@outlook.com

- a. This email was copied on email communications with a recruited short-term doctor and was listed as the contact email on her employment offer letter from the Clinic.

- b. Physician 1 worked at the Clinic from approximately August 2018 to Dec 2021. In an interview in June 2024, Physician 1 stated that the email above was not his email address.

4. [Physician 2 Last Name]md@gmail.com

- a. A Google subpoena response showed only the name of Physician 2 as the subscriber with no further details. However, the subpoena response also contained GooglePay documents. A GooglePay subject matter expert at Google explained that the GooglePay documents show names, addresses, emails and phone numbers that are captured in a multitude of situations, including (1) when a user saves a credit card to their Google wallet, (2) when a credit card is stored in the Google browser, (3) when a credit card is manually input and used to make an online purchase, and (4) when shipping information is entered for an online purchase. The GooglePay documents list Eric HOLLAND, with HOLLAND's date of birth and the HOLLAND Residence address. Additionally, a subpoena response from Comcast showed that the IP addresses used to create and log into the email account were subscribed to Eric HOLLAND at the HOLLAND Residence.

5. [Physician 3 Name]md@gmail.com

- a. GooglePay documents associated with the email address listed Eric S. HOLLAND with HOLLAND's date of birth and the HOLLAND Residence address.
- b. In an interview in July 2024, Physician 3 stated that the email above was not his email address.

6. aberosenthal48@gmail.com

- a. GooglePay documents listed Eric HOLLAND with HOLLAND's date of birth and the HOLLAND Residence address. Additionally, the account was set to show "Dr. [Physician 4] Appointment" as the sender of any emails. Physician 4 is one of the doctors recruited by HOLLAND for his scheme.

7. [Staff Member 1 Name]12309@mail.com

- a. A subpoena response received August 8, 2024, lists the customer as Trafale Capone, Jr.
- b. The phone number used for registration (239-763-4334, subscriber Trife Capone) was known to three recruited doctors to be used by "Eric Collins."
- c. The investigation revealed that Staff Member 1 is a one-time employee of the Clinic when it had a physical location. Law enforcement interviews with Staff Member 1 confirmed that she stopped working at the Clinic upon the execution of a search

warrant on March 15, 2023, and has not been employed there since that date.

8. madelinegarcia@mail.com; sancarmed@mail.com; trifecap@mail.com

- a. A subpoena response indicated that trifecap@mail.com, madelinegarcia@mail.com and sancarmed@mail.com are aliases created alongside the main account ([Staff Member 1 Name]12309@mail.com), and so the customer information is the same; all email addresses are tied to that main account.

Introduction to Business Entities Used

Investigators have identified many business names believed to have been used by HOLLAND for the Clinic in communications with doctors, staffing companies, electronic medical records companies, and financial institutions.

- SMC Health Partners, LLC
 - From approximately 2016 to 2018, SMC Health Partners, LLC was registered at the Physical Clinic Location, with HOLLAND listed as the registered agent and president. The Florida Department of State, Division of Corporations website also lists Summerlin Medical Centre Management Corp. as registered at the same address, with HOLLAND listed as the registered agent and director.
- Medical Professionals of SWFL

- Medical Professionals of SWFL is named on two business checking accounts at Busey Bank used to pay for the lease on the real property that housed the Physical Clinic Location, as well as to pay a former doctor who worked at the Physical Clinic Location.
- The Florida Department of State, Division of Corporations website lists Medical Professionals of SWFL, LLC as an inactive Florida limited liability company. The entity was registered with the Division of Corporations in August 2019. Triffe Capone was listed as the registered agent, with the manager being the Living Trust of Triffe Capone, located at 3479 NE 163 ST PMB #521, North Miami Beach, FL 33160.
- Per Florida Department of State records, in January 2021, the LLC was reinstated listing Abraham Rosenthal as the registered agent and the manager as the Living Trust of Triffe Capone, located at 2423 SW 147 Ave, Miami, FL 33185. The filing, dated January 2022, lists Abraham Rosenthal as the registered agent and the manager as the Living Trust of Abraham Rosenthal, located at 2423 SW 147 Ave, Miami, FL 33185. The manager of the Pack and Ship store located at 2423 SW 147 Ave. confirmed that box 624 was leased by HOLLAND from August 2019 through February 2023. The following is the account information provided:
 - Name: Eric Holland
 - Email address: tlcapone@outlook.com

- Phone number: 239-203-4307
- Home address: 205 SW 39TH ST, CAPE CORAL, Florida 33914
(*i.e.*, the HOLLAND Residence)
- Physicians Primary Care of SWFL
 - During an interview with Physician 3, a recruited temporary physician, investigators learned that this was the practice name provided to the staffing agency which placed Physician 3 and the name of the practice for which Physician 3 believed he was working.
- Office of [Physician 3 Name] MD
 - According to subpoenaed documents and witness interviews, this name was used in various interactions with medical service providers, medical staffing companies, and at least four recruited temporary physicians. Investigators believed the name was used by HOLLAND because one of the first temporary doctors recruited into the scheme was Physician 3. In interviews with law enforcement, Physician 3 indicated he was unaware that a practice entity had been created in his name and that he had not authorized its creation.

The Clinic Search Warrant

In March 2023, the DEA and the Lee County Sheriff's Office executed a Florida search warrant at the Physical Clinic Location based on probable cause to believe that the premises were being used to commit state offenses related to the distribution of

controlled substances and the operation of an unlicensed pain clinic. Months of pole camera footage and live surveillance prior to the search warrant in March 2023 showed that in addition to HOLLAND, the only employees entering the clinic on a daily basis were Staff Member 1 and Staff Member 2. Investigators confirmed with the Florida Department of Health that neither staff member had any medical license or certification.

At the time the search warrant was executed at the Clinic, the Florida Department of Health served a Notice to Cease and Desist upon HOLLAND as owner of the unlicensed pain clinic. The notice informed HOLLAND that operating an unlicensed pain clinic was illegal under Florida law and required the clinic's operations, including the distribution of Schedule II controlled substances such as oxycodone, to cease. At that time, the Physical Clinic Location closed.

After the search warrant in March 2023, investigators received confirmation from the landlord of the property that the tenant of the Physical Clinic Location had been evicted from the office space due to unpaid back rent in the amount of \$42,000. As recently as April 5, 2024, investigators went to the Physical Clinic Location and confirmed the Clinic was not operating there.

Furthermore, the investigation has not found any evidence suggesting that the Clinic continues to operate at any other physical location or employs any individuals other than the temporarily recruited doctors. Investigators have conducted checks at multiple addresses found in documents related to the Clinic that have been gathered during the investigation. In checking these addresses, investigators have confirmed

that there is no clinic operating at the locations. In fact, some addresses are not valid physical addresses.

Additionally, in August 2023, investigators interviewed Staff Member 1 and Staff Member 2 and confirmed they were no longer working for HOLLAND. Furthermore, law enforcement review of telephone records confirmed that the staff members have not been in contact with HOLLAND via any of their known telephone numbers.

Overview of the Clinic's Continued Operation in a Virtual Setting

Since the execution of the search warrant and service of the cease-and-desist letter, investigators believe that HOLLAND has continued to operate the Clinic in an exclusively virtual setting. In this virtual clinic, patients contact HOLLAND and pay him via applications such as CashApp. In exchange, HOLLAND arranges a telemedicine visit with a doctor who then electronically issues controlled substance prescriptions under false pretenses.

To carry out this scheme, HOLLAND recruited doctors through the use of medical staffing agencies used to fill temporary positions, referred to in the medical industry as *locum tenens* placements. Through aliases and deceptive statements and actions conveying that he was operating the Clinic with a physical location and staff, HOLLAND recruited doctors from *locum tenens* agencies to temporarily cover the positions of “permanent” doctors who were on “leave,” and fill controlled substance prescriptions for the Clinic in their “absence.” The temporary doctors hired by HOLLAND then wrote prescriptions for large amounts of controlled substances (often

powerful and commonly abused opioids) to patients who they believed were being treated in person at a physical clinic by another doctor on a traditional, permanent basis. Typically, the *locum tenens* doctor eventually stopped working for the Clinic because HOLLAND did not pay them for their work.

Based on a review of prescription data for the Clinic and doctor interviews, law enforcement believes that at least sixteen temporary doctors have written controlled substance prescriptions for patients of the Clinic since the Physical Clinic Location closed. All did so solely via telemedicine, without ever physically examining the patient.

Moreover, based upon a review of telephone records, as of at least late May 2025, HOLLAND continues to be in contact with patients of the clinic and doctors prescribing for those patients, and patients continue to fill the prescriptions written by the doctors with whom HOLLAND is in contact.

Details Relating to the Continued Operation of the Virtual Clinic

Between April 2023 and May 2025, investigators interviewed fourteen physicians who worked for the Clinic via telemedicine after the closure of its physical location in March 2023.¹

¹ Investigators also spoke with Staff Member 1 and Staff Members 2, who manned the front desk before the Clinic transitioned to all-virtual operations. Both staff members advised that the owner of the clinic was Eric HOLLAND, whom they knew by that name and who came regularly, though not every day. Although the staff members would sometimes take patients' blood pressure and other vitals (which was documented on a paper patient intake sheet, scanned to the "office email"—they did not remember the email—and then thrown in a recycling bin), neither had any particular medical certification or licensure. The staff members stated that only HOLLAND had access to the Clinic email.

According to the doctors' statements, as well as Florida's Prescription Drug Monitoring Program (PDMP), a government-run initiative which tracks all prescriptions of controlled substances dispensed in the state, fourteen of the doctors interviewed prescribed oxycodone, a Schedule II controlled substance, to the Clinic's patients via telemedicine since the closure of the Physical Clinic Location.

Investigators confirmed electronic prescriptions issued for Clinic patients through data received from ScriptSure, an electronic medical records and electronic prescription software used by the Clinic for part of the time that the Clinic has been in operation in a virtual setting. Additionally, a review of State of Florida prescription drug monitoring program data from the time of the clinic closure on March 15, 2023, through May 30, 2025, for the temporary doctors spoken to by investigators showed that these doctors wrote at least 524 prescriptions for oxycodone 30 mg tablets for Clinic patients, totaling 54,345 tablets with a street value of approximately \$2,950,884. Physician 4, who was not interviewed, has written 445 prescriptions for oxycodone 30 mg, totaling 48,962 tablets at a value of approximately \$1,468,860.

As discussed in further detail below, many of the doctors indicated that they had been told by HOLLAND that they were filling in for another doctor with an established relationship with the patients they would be seeing. Doctors were falsely told that the patients would be seen in-person at the Clinic before their telemedicine appointment.

Locum Tenens Agencies

Information gathered by investigators shows that, on multiple occasions, HOLLAND corresponded with *locum tenens* staffing agencies in order to find and recruit doctors to prescribe for the Clinic and otherwise further his scheme.

For instance, records provided by CHG Healthcare (CHG), a healthcare staffing firm, list stromcollins@hotmail.com and tlcapone@outlook.com as the emails used for correspondence between “Eric Collins” and CHG in August and September 2023. In one of the internal emails, “Eric Collins” is listed as the point of contact for the account. The contract with CHG was signed by “Eric Collins.” The emails [Physician 3 Name]@gmail.com, [Physician 2 Name]md@gmail.com, and aberosenthal48@gmail.com were copied on emails drafted from the email stromcollins@hotmail.com. Emails written from the email stromcollins@hotmail.com were signed “Eric.” The consultant from CHG addressed emails to “Eric,” which were sent to stromcollins@hotmail.com. The emails reviewed by investigators were used to discuss retaining CHG’s services to place doctors in *locum tenens* positions at the Clinic. Specifically, HOLLAND used the emails to send CHG information about the Clinic, such as that the practice was that of Physician 3, located at 16790 San Carlos Blvd.,² Fort Myers, Florida and billed under the name Medical Professionals of SWFL. HOLLAND also sent CHG an application for credit that

² The address 16790 San Carlos Blvd., Fort Myers, Florida is a false or mistakenly transposed version of the Physical Clinic Location. It is not a real street address; a Google search shows the address corresponds to the middle of an empty field.

would have allowed CHG to pay providers directly, with compensation expected eventually from the Clinic, and agreements for services between the Clinic and CHG. HOLLAND was unsuccessful at establishing an account at CHG because he could not provide a tax ID with a credit history and therefore the internal credit check was returned as “insufficient” or “no report.”

Likewise, a subpoena response from Hayes Locums (Hayes), a medical staffing agency, provided the initial form submitted to Hayes to request staffing services. The form listed the point of contact and medical staff coordinator as “Eric Collins” at stromcollins@hotmail.com. The address for the clinic was listed as 16790 San Carlos Blvd., Fort Myers, Florida 33908. The email address stromcollins@hotmail.com was used with Hayes to discuss the placement of doctors in *locum tenens* positions at the Clinic and credentialing of doctors. One doctor was referred to the Clinic by Hayes in October 2023.

Finally, thirteen doctors who prescribed for the Clinic’s patients between July 2023 and May 2025 indicated that they were connected with the Clinic via LocumTenens.com (“LocumTenens”), another staffing agency. Records obtained from LocumTenens in February 2024 show that “Abe” had sought the website’s credentialing services to place doctors at the clinic using the email address tlcapone@outlook.com. The postings the doctors responded to were linked to that email address. HOLLAND continued to use tlcapone@outlook.com in addition to stromcollins@hotmail.com and [\[Physician 2 Name\]md@gmail.com](mailto:[Physician 2 Name]md@gmail.com) through May 2023 to discuss the staffing of doctors with LocumTenens.

Subpoenaed documents from LocumTenens showed that initial contact by “Abe” with LocumTenens was in May 2023, ultimately leading to Physician 3 being staffed at the Clinic. Physician 3 was scheduled and paid through LocumTenens. Later, investigators learned that several doctors were responding to posts on the LocumTenens job board rather than being directed by staffing consultants. Four additional doctors responded to these postings and worked for the Clinic. LocumTenens.com does not monitor the job board or capture information from the job board other than the original post.

Physician 3

According to his statements made to DEA investigators, Physician 3, who worked for the Clinic between May 2023 and October 2023, was placed at the Clinic through LocumTenens. Physician 3 knew the individual running the clinic as “Eric Collins.” Eric introduced himself as the office manager who worked with Physician 2. Physician 3 believed that the name of the practice he worked for was “Physicians Primary Care of SWFL.”

Physician 3 explained that his work for the Clinic was on a consultation-only basis. He would conduct video consultations with the Clinic’s patients but would not write prescriptions. During his interview, Physician 3 advised he was told by “Eric Collins” that he was to fill in, as “the doctor was on vacation.”

At some point during Physician 3’s tenure at the Clinic, HOLLAND asked him to begin prescribing controlled substances. Physician 3 declined, explaining that, in his understanding of the applicable laws and regulations, he could not write prescriptions

for new patients via telemedicine. HOLLAND responded that all the patients were follow-up patients and had been seen before. Physician 3 told HOLLAND that these were not follow-up patients for him; they were new patients to Physician 3. At the time, HOLLAND indicated that he accepted that decision, but he later tried again to get Physician 3 to prescribe.

After HOLLAND had recruited Physician 3 to join the Clinic on a temporary basis, the Clinic began to use Physician 3's name in various ways to give the appearance of a legitimate and lawful pain clinic.

- For instance, records from ScriptSure, an electronic medical record provider and electronic prescription processor, showed that an account had been created using the name "Office of [Physician 3] MD." Notably, that account was used by later-recruited temporary doctors to prescribe controlled substances to the Clinic's patients. ScriptSure confirmed to investigators that its account contact for that account was "Eric Strom Holland" who used the email address stromcollins@hotmail.com.
- An account using Physician 3's name was created with Practice Fusion, an electronic medical record provider and electronic prescription processor. Practice Fusion records an IP address when users complete the initial account setup or login. Records from Comcast showed that the IP addresses for the logins were assigned to an account for which HOLLAND was the subscriber, listing the home address as the HOLLAND Residence.

- Investigators also discovered an account with Melio, an electronic payment platform, associated with HOLLAND, the Clinic, and Physician 3's name. According to subpoenaed documents from Melio, one account had the following details:
 - Account No. 2910372
 - Company Name: Medical Professionals
 - Contact Name: [Physician 3's Name]
 - Email: [Physician 3's Name]@gmail.com
 - Phone Number: 239-763-4334
 - Address: 2423 SW 147 Ave., Miami, FL 33175
- Investigators later received documents showing that the Melio account was itself associated with a Greendot Bank account in the name of Eric HOLLAND with email stromcollins@hotmail.com. Later temporary doctors told investigators that the Clinic used this Physician 3-related Melio account in elaborate ruses designed to give the appearance that payments for their services would be forthcoming.
- Several other doctors received employment agreements referring to the Clinic as the Office of [Physician 3 Name] MD; Physician 3 indicated he did not know of or permit the Clinic's use of his name.
- Additionally, beginning in about May 2023, "Eric Collins, Office Manager" sought to obtain a pain clinic licensure exemption from the

Florida Department of Health under Physician 3's name. In the State of Florida, pain clinics must be licensed by the Department of Health and inspected annually. Certain medical specialists, such as anesthesiologists and physiatrists, qualify for an exemption to the licensure requirement. In the case of an exempted clinic, a doctor must file for the exemption with the Department of Health. Exempted clinics are not subject to inspection. Owning or operating an unlicensed clinic is a third-degree felony in Florida. The exemption application listed Physician 3 as the Clinic's practicing physician and relied on the fact that Physician 3 had completed a residency in physiatry to support the application. The application was accompanied by documents, such as a copy of Physician 3's diploma and a letter from a residency program director, attesting to his medical education. Physician 3 stated he had not provided the documents to HOLLAND and could only think that LocumsTenens had provided them. Physician 3 stated that HOLLAND had never approached him about obtaining a pain clinic licensure exemption and that he had not authorized an exemption application under his name. Emails to the Florida Department of Health concerning the exemption application were written from the [Physician 2 Name]md@gmail.com email address, copying [Physician 3 Name]@gmail.com and aberosenthal48@gmail.com.

Physician 3 stated that he had not created or authorized the ScriptSure, Practice Fusion, or Melio accounts associated with his name, nor the email address [Physician 3 Name]@gmail.com.

Physician 5

On two occasions, DEA investigators interviewed Physician 5, who prescribed for the Clinic via telemedicine in July 2023. Physician 5 held two DEA registrations, one in Florida and the other in Georgia. Physician 5 was physically in Georgia at the time he worked for the Clinic. Physician 5 was contacted by “Eric Collins,” who found his resume on a job board. Physician 5 communicated with Eric Collins via text message at 239-763-4334. Email communications were with stromcollins@hotmail.com, [Physician 2 Name]md@gmail.com, and aberosenthal48@gmail.com. In text messages, Eric Collins repeatedly assured Physician 5 there was a physical clinic and that the patients were being physically seen by a medical practitioner.

Eric Collins informed Physician 5 that “[a] board-certified physiatrist is the main doctor. I have 2 MD on vacation starting this week” and that “[t]hese patients would’ve been seen by a physiatrist already and then referred to the doctor to continue the medication. They are chronic pain. Patient required to come in every 28 days. Medicine is all controlled by the state in regard to morphine equivalent everything

electronic prescribing.”³ Collins stressed that there were “[a]bsolutely nobody new patients.”

Eric Collins further reassured Physician 5 that “[y]es, these patients would be examined prior to you releasing medication. Either one of the medical doctors or we have a PA that will do the exams.” Eric Collins also stated “[y]es, correct the way it works is come into the physical location triage if they are due for a urine screen etc. they see [Physician 3]. That would be that name of the door. Typically he would send it off to on of the MD, to continue regiment. There are some scenarios where I would bring a PA in if the MD wasn;t available. For example if it was your follow up wince you’re at a distance then the patient would have to be examined by a PA then to you.” Eric Collins added “[f]or example, [Physician 2] boarded internal medicine and cardiology. Who is the MD for these patients but the scenario requires an MD who is considered exempted from a pain management clinic license in the state of Florida (physical medicine and rehabilitation/anesthesiology/neurology, rheumatology, boarded in pain, only ones that are exempted to even write medicine in the state of Florida can only be internal medicine, family medicine, emergency medicine, but they must have an exempted MD who see the patient first. These would be the patients that would be getting the medication sent.”

³ For this and all other quotations of HOLLAND’s or doctor’s emails, text messages, or other writings, the messages are reproduced with the original punctuation, capitalization, and spelling unless otherwise noted.

Eric Collins also told Physician 5 that the clinic was located at 16329 S Tamiami Trail, Fort Myers, Florida 33908.

HOLLAND's representations that patients would be examined prior to being given medication by Physician 5, that they would be subjected to urine screens, and that the patients would be seen by a PA (*i.e.*, physician assistant) were false, as the Physical Clinic Location was closed. The investigation has never located any physician assistant who worked for the Clinic or examined Clinic patients.

Physician 5 became suspicious of the legality of the practice, explaining, for example, that he could not find a valid pain clinic license and could not verify that there were any other employees at the clinic. Physician 5 contacted ScriptSure and requested his user account be deactivated.

During his employment with the Clinic, Physician 5 wrote 61 prescriptions for controlled substances, including 26 prescriptions for oxycodone 30 mg. The only patients he wrote prescriptions for in Florida were for the Clinic. Physician 5 indicated in his interview that, had he known the full circumstances of the Clinic's operations and the falsity of HOLLAND's representations, he would not have worked for the Clinic or prescribed controlled substances.

Physician 6

Physician 6 was directed to the Clinic via LocumTenens staffing consultants and prescribed for the Clinic in July 2023.

On July 3, 2023, Physician 6 was contacted by "Eric Collins" via text message using the phone number 239-763-4334. The message read as follows:

“My name is Eric Collin We spoke sometime back in regard to doing some covering work telemedicine in my Ft. Myers office This would be one day a week A board-certified physiatrist is the main doctor I have 2 MD on vacation starting this week. This will be one day a week. Possibly a day and a half per week. Compensation 250 per hour. The coverage hours would 10:30 till 4:30 pm. Would be covers I would need throughout July at a minimum. For that one day a week. Name of the company’s medical professionals of Southwest Fl If you’re interested, please let me know a time to speak Appreciate your valuable time Eric[.]”

On July 17, 2023, Eric Collins wrote to Physician 6: “OK I’ll have them re-issue the offer letter On the form to get the system Oh across the top it should be pre-printed with the name Dr. [Physician 3] and then x practice address below 7050 Windsor Rd. Did they send you a blank form?” Later that day, Eric Collins wrote, “Dr [Physician 3] said if you had any questions he would be glad to help[.]”

Physician 6 was never able to speak with Physician 3 despite her repeated requests to speak with him.

On July 20, 2023, Physician 6 asked how often patients were drug screened. Eric Collins replied: “They are given 3 random urine screens each one’s on a separate clock they try and do them quarterly sometimes twice and a quarter just depends what they’re required by law to will do three and the doctor really is concerned they would do a tablet count but we’ve not had that in quite some time” and “We also take it a step further is one of them also are required to do either a neurosurgical evaluation, or a orthopedic valuation, depending on the injury and that gives the doctor some

comfort Because they are XMI by the expert in the field so that there is no ambiguity as to what the injury is[.]”

Throughout the text messages with Eric Collins, Eric refers to things Physician 3 has advised or what Physician 5 did with his notes, giving the impression that those doctors were currently treating the patients. He also mentions things “the girls” in the office are taking care of, for instance uploading medical records or entering prescriptions into the system. However, at the time, the Physical Clinic Location was closed, patients were not being subjected to urine screens, and there were no “girls” completing tasks for the Clinic at any physical location.

While seeing patients via telemedicine, Physician 6 observed patients calling into their appointments from non-office locations. On July 21, 2023, Physician 6 asked, “yeah but Eric where are they being examined. They’re calling from their homes and cars[.]” Eric Collins responded, “So, for example. Dr. [Physician 5] will be in the office so he will be the one that will be seeing the patients[.]” However, Physician 5, as mentioned, did not physically examine any patients and worked solely by telemedicine.

Physician 6 was never paid for her work and stopped working for the Clinic.

During her employment with the Clinic, Physician 6 wrote 206 prescriptions for controlled substances, including 116 prescriptions for oxycodone 30 mg. Physician 6 indicated in her interview that, had she known the full circumstances of the Clinic’s operations and the falsity of HOLLAND’s representations, she would not have worked for the Clinic or prescribed controlled substances.

Physician 7

In January 2024, investigators conducted an interview with Physician 7, a doctor who prescribed for patients of the Clinic via telemedicine in October 2023. Physician 7 communicated with an individual who identified himself as “Eric Collins.”

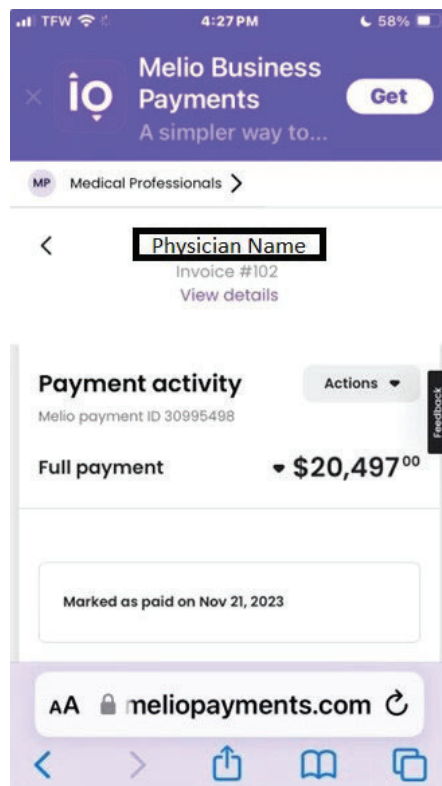
Information provided by Physician 7 showed that he responded to a job posting on the LocumTenens job board. The job posting stated: “This is a 2-3 day per week covering MD/DO position 4 hour shift only no weekends or nights qualified MD/DO will just be continuing patient regiments electronically via telemed ALL PATIENTS EXAMINED ON SITE BY PA PRIOR TO ANY RX medicine management all patient regiments within CDC guidelines /pharmacy guidelines.” These representations were false, as there was no physician assistant examining patients at a physical location.

Physician 7 responded to this posting through the LocumTenens job board messaging system. Physician 7 then received an email from LocumTenens conveying a message from “Marty Rosenthal” and signed by “Eric.” All additional messages arranging employment were conducted via text between Physician 7 and Eric Collins. The subscriber for one of the numbers used to communicate was Eric HOLLAND, with the account address being HOLLAND’s home address. The other numbers used are also known to be controlled by HOLLAND.

Physician 7 worked during the time period of October 20, 2023, to November 16, 2023. On October 30, 2023, Physician 7 began asking about payment for work

done for the Clinic. Eric Collins repeatedly assured him that he was in communication with payroll and that funds had been sent.

On November 21, 2023, Eric Collins sent Physician 7 a screenshot of a payment allegedly made through Melio for \$20,497. The screenshot contained a payment ID which allowed related records and accounts to be identified. Records obtained from Melio by subpoena show that the payment to Physician 7 was deleted one minute after it was scheduled.



Despite numerous assurances that he would be paid, Physician 7 never received payment for his work for the Clinic.

During his employment with the Clinic, Physician 7 wrote 98 prescriptions for controlled substances, including 49 prescriptions for oxycodone 30 mg. Physician 7

was not working anywhere else at the time he was working for the Clinic. Physician 7 indicated in his interview that, had he known the full circumstances of the Clinic's operations and the falsity of HOLLAND's representations, he would not have worked for the Clinic or prescribed controlled substances.

Physician 8

In April 2024, investigators interviewed Physician 8, who prescribed for the Clinic in December 2023.

Investigators confirmed that Physician 8 communicated with an individual he knew as "Derek Collins," who used the email addresses tlcapone@outlook.com and stromcollins@hotmail.com. "Derek Collins" texted Physician 8 from phone number 239-671-0812, which is subscribed to Eric HOLLAND at his home address. "Derek Collins," or HOLLAND, initially contacted Physician 8 on November 27, 2023, about Physician 8's potentially working at the Clinic. One of HOLLAND's first messages described the Clinic and work as follows:

"We have an existing chronic pain facility in Ft Myers Fl. I have two doctors out one medical one medication third one about to go on medical so I have some coverage needed now throughout the end of the year possibly longer. So these would be just follow-up patients there's nobody new. These would be follow up chronic pain patients that come back or scheduled every 28 to 30 days so this would just be covering for existing MD their patients and their treatment plan regiment everything is electronic . . . so between the pharmacy and the doctor over the last several years, they've worked the patient down to particular morphine equivalent that's accepted Every patient has radiology to match whatever injury neurosurgical reports operative reports . . . The remainder of this month is set up as telemedicine. Follow up. the PA has already examined the patients. So they would be ready for their regiment. We would like to see somebody physically come in the office two days a week or some type of hybrid we would be open to as well. I will need coverage telemedicine

this week if you have availability And a direct deposit, so the company can pay you ACH wire But my name is Derek. I'm the administrator there"

In a related conversation that same day, Physician 8 indicated he would not be able to be onsite at the Clinic. HOLLAND responded "Oh, you can do it remotely that's just another option down the line but you can certainly do it remotely only differences we would have them examined by a PA or one of our advanced nurse practitioners so that's certainly fine."

On November 28, 2023, Physician 8 texted "Hello, I'd like to verify this position a bit further. I cannot find the clinic information on google. Or a Dr. [Physician 3] working in Fort Myers. This is likely a mistake on my behalf, but I'd like some reassurance going forward. Can you provide me with the clinic address location/phone number? Name of the PA that I'll be working over? and any further relevant information to help confirm the legitimacy of this position. Thank you."

HOLLAND replied with a screenshot of Physician 3's medical license from the Florida Department of Health website. HOLLAND also wrote "[p]ractice location is 3677 central Avenue unit H Fort Myers fl 33901 Office number 239-748-0059 [...]" That's the location that we talked about the other day that wanted to have somebody come in a couple days a week, but certainly telemedicine would be fine in this short term because these patients would've been examined already[.]" HOLLAND also sent an image of a fake paystub for Physician 7 to provide further reassurance that the Clinic was real and could be expected to pay.

Contrary to HOLLAND's representations, Physician 3 was not overseeing the Clinic, 3677 Central Avenue was the address not of the Clinic but an empty office location that was once a roofing company, and the patients were not being physically examined by anyone.

On November 28, 2023, Physician 8 entered into an employment contract with "Medical Pro of SWFL," which was signed by "Abe Rosenthol, CEO."

On December 5, 2023, Physician 8 inquired about a particular patient, as the patient stated that he or she had not been seen in person for some time. Physician 8 had previously indicated that it was his understanding that patients had to be seen in person (rather than via telemedicine) once every three months. HOLLAND replied to Physician 8's concern by saying, "I'm gonna have the girls pull his notes back up, but he's been every month for sure . . . He would have everything there should be a note October, November . . . Yeah, he would've seen [Physician 3] in person[.]" Contrary to HOLLAND's representation, Physician 3 had not seen any of the Clinic's patients in person.

According to PDMP data, during his time with the Clinic, Physician 8 wrote 103 controlled substance prescriptions, including 41 prescriptions for oxycodone 30 mg. Physician 8 was not working anywhere else at the time he was working for the Clinic. Physician 8 indicated that, had he known that many of the representations made to him by HOLLAND about the Clinic, its practices, and its patients were false, he would not have worked for the Clinic or prescribed controlled substances to its patients.

Physician 9

In October 2024, investigators conducted an interview with Physician 9, a doctor who prescribed for patients of the Clinic via telemedicine from May 2024 through September 2024. Physician 9 communicated with an individual who identified himself as “Derek Collins.” Physician 9 stated that the patients referred to “Derek” as “Eric.”

Information provided by Physician 9 showed that he responded to a job posting on the LocumTenens job board. Physician 9 then received the following text message from “Derek Collins” on May 16, 2024:

“Hi Dr. [Physician 9], my name is Derek Collins. You had responded to a locum position in our Fort Myers Florida office. This would be via telemedicine because there is a nurse practitioner in the office examining the patients there are chronic pain patients but just follow ups. Of course everything is electronic. Every medication is of course at a particular morphine equivalent, because most of them are gonna go to a big box pharmacy but there’s nothing but follow ups. I do have some coverage this week coming up if you’re interested. I really appreciate all your time. The number that you responded to was job number 867530991 and that was on. Locumtenens.com Thank you[.]”

While Physician 9 did receive some payment for his services, he was never paid in full. When he began asking about payment for work done, “Derek” would provide an explanation such as seen in a text from August 24, 2024:

“OK, so what about the patients that you just saw but you didn’t send out the prescriptions I’m not gonna be able to collect their money. That’s how I collect their money. Do you understand that so you saw patients you didn’t send the medicine but I’m supposed to pay you full price for that that’s the only concern I have and that would’ve been, the group of you saw that there was like 27 and then last week should’ve been like an hour and a half of patients I never got those medicines out so you’re gonna have a hard time for me generating the income to give you the money on those that I can tell you right now[.]”

During his employment with the Clinic, Physician 9 wrote approximately 88 prescriptions for controlled substances, including 44 prescriptions for oxycodone 30 mg. The dates on which these prescriptions for oxycodone were written included May 31, 2024, and June 28, 2024. Physician 9 indicated in his interview that, had he known the full circumstances of the Clinic’s operations, he would not have worked for the Clinic or prescribed controlled substances.

Physician 10

In February 2025, investigators conducted an interview with Physician 10, a doctor who prescribed for patients of the Clinic via telemedicine from November 2024 through January 2025. Physician 10 communicated with an individual who identified himself as “Derik.”

Information provided by Physician 10 showed that on about November 13, 2024, Physician 10 responded to a job posting through the LocumTenens.com job board which stated the following:

Job Description: \$575.-\$625 /HR FLORIDA LICENSED Remote MD/DO Needed MD/DO will be continuing patient monthly regiment electronically to pharmacy patient will be examined on site PA / NP every 28 days prior to regiment continuing Job Details: Job Id: 794536 Title(s): MD, DO Location(s): FL

Specialty(s): Anesthesiology, Emergency Medicine, Family Practice, General Surgery, Internal Medicine, Neurology, Orthopedic Surgery, Physical Medicine & Rehabilitation, Rheumatology, Pain Medicine Job Type: Locum or Permanent[.]

Physician 10 then received a text message from “Derik” introducing himself. Derik called Physician 10 the same day and explained her role and the job. According to Physician 10, Derik explained that she would be managing established pain management patients and refilling patient pain medications. Derik explained, as was written in the job post, that patients would be seen by a PA in the clinic and would then have a telemedicine visit with the doctor regarding their medications.

At Derik’s request, and at least in part as a consequence of pharmacies refusing to fill prescriptions, Physician 10 made numerous changes to prescriptions, spending so much time doing so that she tracked her time using an app. While Physician 10 did receive some payment for her services, she was never paid in full. When she began asking about payment for work done, she received excuses and promises of payment, both via text from “Derik” and email from “Kevin.”

Physician 10 inquired about additional payment for the numerous pharmacy changes. Derek advised it would be no problem. On December 6, 2024, “Kevin” wrote:

Good Evening I want to confirm we do have the additional .50 Hr. worked from the 11/30/24 work day . Historically, what we do is the following If it’s a weekend shift. Or in this case Saturday. We submit

for payroll the four hours that are scheduled and then an additional half hour to cover the extra time that may occur , typically on a four hour shift. There's usually about a half hour extra so we just include with your payroll Madeline did submit the extra half hour so that will go out this week To make sure your compensated for that as well[.]

In a text on December 10, 2024, Physician 10 again confirmed extra payment for extra time spent on pharmacy changes. Derik responded "But yes, keep the pharmacy change time and we can add that in with the Saturday book. I'll touch base with Kevin to let him know to put in for 5 ½ hours for Saturday plus a half hours prescription change[.]"

On December 12, 2025, Derek texted "I spoke with Kevin to make sure they took care of the half hour work."

On December 21, 2024, Dr. Cousin-Peterson received an email from "Kevin" stating as follows:

"An attempt to separate the 1/2 prescription repair from the prior week we issued 2 payments. \$287.00. And \$2600.00 for your hours worked on the 14th. As I'm going through my books i m just realizing the error, I issued An additional \$275.00 as your payroll should've been 2875 not 2600 I do have the half hour RX changes from Thursday as well that will go out this week as usual process I'm extremely sorry about the error"

The last contact Physician 10 had with "Derik" was a text on January 10, 2025, confirming "Payroll went out today." On January 11, 2025, Physician 10 inquired again about payment and got the following response from "Kevin": "There was an \$1800 payroll for you. I can see it in the log. Let me confirm that there was 1800 .00 sent out. I will get you confirmation right now."

On January 13, 2025 she received the following email from "Kevin":

“Good afternoon we’re gonna reissue that money right now. Should be in your account today. I can see it just sitting up there in pending so we’re just gonna re-issue. It should be there today.”

Physician 10 never received this last-promised amount and did not hear from the clinic again.

During her employment with the Clinic, Physician 10 wrote approximately 182 prescriptions for Schedule II controlled substances, including 46 prescriptions for oxycodone 30 mg and 93 prescriptions for oxycodone-acetaminophen 10-325 mg. The dates on which these prescriptions for oxycodone were written included November 30, 2024, and December 21, 2024. All prescriptions were written through Practice Fusion. Physician 10 indicated in her interview that, had she known the full circumstances of the Clinic’s operations, she would not have worked for the Clinic or prescribed controlled substances.

Physician 11

In April 2025, investigators conducted an interview with Physician 11, a doctor who prescribed for patients of the Clinic via telemedicine from February 2025 to March 2025.

A subpoena response from LocumTenens.com showed that Physician 11 responded to the same job post as Physician 10, which had falsely asserted that patients would be examined “on site” by a physician assistant or nurse practitioner.

Physician 11 mainly communicated with an individual who identified himself as “Derek.”

In an email dated March 2, 2025, Physician 11 asked:

“I was going over some charts to familiarize myself with the program. I noted that some patients have no physical examination on follow-up and others have just a general exam with no attention to their complaint, e.g. low back pain. I think something needs to be added directly addressing their issues. Also, how was the specific drug regimen established?”

The same day, Physician 11 received the following response, which reassured him that risk mitigation measures were being taken and that patients were being referred to outside providers in order to obtain personalized and medically appropriate care:

But the original regiment was done by Dr. [Physician 1] and Dr. [Physician 2] patient had an initially come in we hired a MD who was a risk manager that it helped us establish the 2025 protocol Part of the 2025 protocol That’s what caused us to start splitting the book up so that each MD would have manageable patient base. The patients have been referred to the expert in their fields for an evaluation that needs to be completed by the end of April, so for example, the muscular skeletal injuries would be referred to Southwest Florida Neurodurgical Associates, so a neurosurgeon can evaluate them. Then the MD for those patients would be working with the neurosurgeon results to adjust the treatment plan. Accordingly there may be surgical intervention just depending on what the neurosurgeon evaluation

Contrary to these representations, however, none of the doctors spoken to by investigators ever mentioned referring a Clinic patient to a neurosurgeon or other outside provider. Nor, in reviewing Clinic medical records obtained from ScriptSure and Practice Fusion and other sources, did investigators encounter any record of such outside referrals or of a “risk manager” physician.

Physician 11 offered to come to the Clinic's office in person on more than one occasion, even asking when a purported new Bonita Springs office would be open. He was never able to actually visit an office.

Physician 11 sent and received several emails relating to payment and was promised that he would be paid and that he would receive reimbursement for DEA fees and malpractice insurance. Ultimately, however, was not paid for the two days he worked or reimbursed for his expenses.

During his employment with the Clinic, Physician 11 wrote approximately 35 prescriptions for Schedule 2 controlled substances, including 8 prescriptions for oxycodone 30 mg and 19 for oxycodone-acetaminophen 10-325 mg. The dates on which these prescriptions for oxycodone were written included February 25, 2025, and March 4, 2025. All prescriptions were written through Practice Fusion. Physician 11 indicated in his interview that, had he known the full circumstances of the Clinic's operations, he would not have worked for the Clinic or prescribed controlled substances.

Physician 12

In February 2024, investigators interviewed Physician 12, who prescribed for the Clinic via telemedicine from Kansas in December 2023.

Physician 12 executed an employment contract on December 17, 2023, with "Medical Pro of SWFL," which was signed by "Abraham Rosenthal, CEO."

Physician 12 received unsigned emails from stromcollins@hotmail.com listing changes to be made to prescriptions. For instance, among other similar messages, on

January 4, 2024, Physician 12 received another unsigned email from stromcollins@hotmail.com with a list of requested pharmacy changes for patient prescriptions.

This email was sent during a period of time when—based on HOLLAND’s driver’s license address, electric and Internet utilities, and long-time residence, as set forth fully above—HOLLAND was believed to be living at 205 SW 39th Street, Cape Coral, Florida. During his interview, Physician 12 stated he was in Kansas and performed visits via telemedicine. Data subpoenaed from a telemedicine video platform used by Physician 12 showed that the IP address used was associated with a Kansas address.

ScriptSure

During the course of this investigation, investigators have identified two electronic medical records software companies used by HOLLAND to further the operation of his Clinic scheme, namely, ScriptSure and Practice Fusion.

Physicians interviewed by investigators indicated that, both before and after the Clinic’s physical closure, prescriptions were frequently sent using ScriptSure. ScriptSure is a commercially available software program that can record very basic medical notes and allows doctors to electronically send prescriptions to a given pharmacy. Subpoenaed records from ScriptSure revealed accounts under the names Office of [Physician 2] and Office of [Physician 3].

The contact email address for the ScriptSure accounts was listed as stromcollins@hotmail.com, and ScriptSure’s compliance manager advised

investigators in July 2022 that the individual with whom ScriptSure dealt with for the Clinic since 2016 was Eric Holland, who went by “Strom,” his middle name. Copies of ScriptSure invoices through 2022 were addressed to Eric Holland as the contact for the Clinic located at the Physical Clinic Location. ScriptSure is paid for on an ongoing, monthly subscription basis, and credit card authorization forms associated with the Physician 3 account list a credit card in the name of Eric Holland.

According to information provided by ScriptSure, any electronic prescriptions sent in this case handled by ScriptSure would have been sent using the company’s computer servers, which are located in the state of New York. Among many other prescriptions sent using ScriptSure, on December 20, 2023, Physician 12 logged into the Physician 3 account and sent multiple electronic prescriptions, including prescriptions for controlled substances such as oxycodone. These prescriptions were reported as filled by the state of Florida’s Prescription Drug Monitoring Program, which specifically monitors prescriptions filled in Florida.

Practice Fusion

After the Clinic’s ScriptSure service was terminated for nonpayment, a new account was established for the Clinic with Practice Fusion. Practice Fusion is a cloud-based electronic medical records platform used to create and keep electronic medical records and to send electronic prescriptions. Records from Practice Fusion show that, in January 2024, an account was created under the practice name “Dr. [Physician 3] MD” and with the same facility name.

The following email addresses were used to create user profiles for the individual given in parentheses: [Physician 3 Name]@gmail.com (for Physician 3), [Staff Member 1 Name]12309@mail.com (for Staff Member 1), [Physician 2 Name]md@gmail.com (for another temporary physician), and madelinegarcia@mail.com (for Mrs. Madeline Garcia).⁴

Practice Fusion recorded a login IP address when each of the email addresses/users above completed the initial account creation and login. Records from Comcast showed that the IP addresses for the logins for [Physician 3 Name]@gmail.com, [Staff Member 1 Name]12309@mail.com, and madelinegarcia@mail.com were assigned to Eric HOLLAND. The address associated with the Comcast account was the HOLLAND Residence.

Both Physician 3 and the other temporary doctor for whom a user profile was created confirmed in interviews that they did not use Practice Fusion at the Clinic, never made Practice Fusion accounts, and did not authorize anyone to do so for them.

According to information provided by Practice Fusion, any electronic prescriptions sent in this case handled by Practice Fusion would have been sent using computer servers leased by the company and located in the states of Virginia and California. Among many other prescriptions sent using Practice Fusion, on November 30, 2024, Physician 10 logged into the Clinic's Practice Fusion account and sent

⁴ Madeline Garcia is believed to be a false identity used by HOLLAND. No such individual appeared in a search of Florida's driver's license database, and, aside from electronic records such as those mentioned above, investigators have not come across any information indicating that such a person works for or is associated with the Clinic.

multiple electronic prescriptions, including prescriptions for controlled substances such as oxycodone. These prescriptions were reported as filled by the state of Florida's Prescription Drug Monitoring Program, which specifically monitors prescriptions filled in Florida.

Surescripts

In addition to ScriptSure—an electronic medical records company using which doctors can send prescriptions—there is another company, Surescripts, relevant to this case. Surescripts acts as a national-level clearing house for electronic prescriptions; prescriptions created in electronic medical record software systems, such as Practice Fusion and ScriptSure, are then sent to Surescripts, which then forwards the electronic prescription to the appropriate pharmacy. According to information provided by Surescripts, electronic prescriptions would pass through the company's servers in Virginia or Minnesota. On February 25, 2025, Physician 11 used Practice Fusion to issue several electronic prescriptions, including prescriptions for controlled substances such as oxycodone, for Clinic patients. These electronic prescriptions passed through Surescripts servers in Virginia and Minnesota before being reported as filled by Florida's Prescription Drug Monitoring Program.

CONCLUSION

Based on the forgoing, I respectfully submit that there is probable cause to believe that Eric Strom HOLLAND committed the offenses more fully set out in Attachment A

/s/ Melissa Szwanke

Melissa Szwanke, Diversion Investigator
Drug Enforcement Administration

Attested to by the affiant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone this 16 day of June, 2025.



Kyle C. Dudek
United States Magistrate Judge

ATTACHMENT A**Counts Alleged****Counts One through Six (Distribution and Dispensing of Controlled Substances):**

On or about the following dates, in the Middle District of Florida, and elsewhere, the defendant, Eric Strom HOLLAND, did knowingly and intentionally distribute and dispense, and willfully caused to be distributed and dispensed, a Schedule II controlled substance, namely, oxycodone, not for a legitimate medical purpose and outside the usual course of professional practice:

Count	Date	Physician Prescribing
One	May 31, 2024	Physician 9
Two	June 28, 2024	Physician 9
Three	November 30, 2024	Physician 10
Four	December 21, 2024	Physician 10
Five	February 25, 2025	Physician 11
Six	March 4, 2025	Physician 11

In violation of 21 U.S.C. § 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2.

Counts Seven through Ten (Fraud by Wire): Having devised and intended to devise a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, the defendant, Eric Strom HOLLAND, in the Middle District of Florida and elsewhere, for the purpose of executing the scheme, transmitted and caused to be transmitted by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds, each wire constituting a separate count:

Count	Date	Description of Wire
Seven	December 20, 2023	Interstate wire of an electronic prescription from ScriptSure servers in New York to a pharmacy in Florida
Eight	January 4, 2024	Interstate wire of an email message from Eric Strom HOLLAND (via stromcollins@hotmail.com) in Florida to Physician 12 in Kansas
Nine	November 30, 2024	Interstate wire of an electronic prescription from Practice Fusion servers in Virginia or California to a pharmacy in Florida
Ten	February 25, 2025	Interstate wire of an electronic prescription from Surescripts servers in Virginia or Minnesota to a pharmacy in Florida

In violation of 18 U.S.C. § 1343.