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

United States Courts
Southern District of Texas
FILED

June 17, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

**JASON BRUCE and
GERREN BRIGNAC, R.PH,**

Defendants.

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**Criminal No. 4:25-cr-00324
UNDER SEAL**

INDICTMENT

The Grand Jury charges that:

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 10mg 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 Houston’s black market.

b. “Potentiators,” so-called because they enhanced the high from opioids like hydrocodone, included carisoprodol, a Schedule IV controlled substance classified as a muscle relaxant. Carisoprodol had substantial street value and was in high demand on Houston’s black market.

5. With exceptions not applicable here, only appropriately licensed and registered pharmacies could dispense controlled substances, and only pursuant to legitimate prescriptions issued for a legitimate medical purpose by an appropriately licensed and registered practitioner acting 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, RELEVANT INDIVIDUALS, AND ENTITIES

7. Defendant **JASON BRUCE** (“**BRUCE**”), a resident of League City, Texas, co-owned and operated Ennis Street Pharmacy (“Ennis”) and owned and operated Pharmacist PRN.

8. Defendant **GERREN BRIGNAC** (“**BRIGNAC**”), a resident of Rosharon, Texas, was a registered pharmacist, licensed by the Texas State Board of Pharmacy (“TSBP”) and, at times, was employed by Pharmacy PRN and operated as the pharmacist-in-charge (“PIC”) of Ennis, Pharmacy 1, and other Houston-area pharmacies.

9. Ronald Martin co-owned Ennis and was simultaneously employed as a law enforcement officer in the Houston area.

10. Pharmacist 1 was a registered pharmacist, licensed by the TSBP, and, at times, was employed by Pharmacist PRN and operated as the PIC of Ennis.

11. Pharmacy Technician 1 was employed by Pharmacist PRN and, at times, worked as a pharmacy technician at Ennis.

12. Ennis, located at 12804 Gulf Freeway #200, Houston, Texas, was a retail pharmacy that operated as a pill-mill pharmacy.

13. Pharmacy 1, located in Houston, Texas, was a retail pharmacy that operated as a pill-mill pharmacy.

14. Pharmacy 2, located in Stafford, Texas, was a retail pharmacy that operated as a pill-mill pharmacy.

15. Pharmacist PRN, doing business in the greater Houston area, was a pharmacy staffing business that provided pharmacists, including **BRIGNAC** and Pharmacist 1, and

pharmacy technicians, including Pharmacy Technician 1, to Ennis, Pharmacy 1, Pharmacy 2, and other Houston-area pharmacies.

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

16. Paragraphs 1 through 15 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

17. From in or around 2016, and continuing through in or around September 2020, the exact dates being unknown, in the Houston Division of the Southern District of Texas, and elsewhere, Defendants,

JASON BRUCE and
GERREN BRIGNAC,

knowingly and intentionally combined, conspired, confederated, and agreed with Martin, Pharmacist 1, Pharmacy Technician 1, pharmacy customers, and 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 controlled substances, including hydrocodone, a Schedule II controlled substance, and carisoprodol, a Schedule IV controlled substance, while knowing that such distribution and dispensing was unauthorized.

Purpose of the Conspiracy

18. It was the purpose of the conspiracy for **BRUCE**, **BRIGNAC**, and their coconspirators, known and unknown to the Grand Jury, to unlawfully enrich themselves by, among other things: (a) unlawfully distributing and dispensing hydrocodone and carisoprodol;

(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 **BRUCE**, **BRIGNAC**, and their coconspirators.

Manner and Means of the Conspiracy

The manner and means by which **BRUCE**, **BRIGNAC**, and others known and unknown to the Grand Jury sought to accomplish the purpose and object of the conspiracy included, among other things:

19. Ennis maintained a Texas Pharmacy License from the TSBP and a registration with U.S. Drug Enforcement Administration (“DEA”).

20. For hydrocodone and carisoprodol customers, Ennis dealt exclusively in cash. **BRUCE** and Martin charged approximately \$2 per hydrocodone pill and \$1 per carisoprodol pill sold from Ennis, dispensed by **BRIGNAC**, Pharmacist 1, or other pharmacists employed by Pharmacist PRN.

21. Ennis distributed and dispensed hydrocodone and carisoprodol, often in combination, to individuals posing as patients. The purported patients were often brought to Ennis by “runners”—street-level drug traffickers who purchased hydrocodone and carisoprodol from Ennis and resold it on the black market—with purported prescriptions issued outside the usual course of professional practice, and without any legitimate medical purpose. **BRUCE** and **BRIGNAC** knew such distribution and dispensing was unauthorized.

22. From in or around 2017, until in or around November 2019, **BRUCE**, through Pharmacist PRN, placed Pharmacist 1 as Ennis’ PIC.

23. In or around October 2018, the TSBP issued a warning letter to Ennis regarding nontherapeutic controlled substance dispensing at Ennis. TSBP warned Ennis ownership that

Ennis was dispensing “prescriptions for controlled substances that potentially lacked a valid medical need or legitimate therapeutic purpose[.]”

24. Ennis ownership also received, from the TSBP, a document titled “Texas State Board of Pharmacy’s *‘Red Flags’ Checklist for Pharmacies: YOU MIGHT BE A PILL MILL IF...*” (the “Red Flags Checklist”).

25. From in or around 2018, until in or around February 2020, **BRUCE**, through Pharmacist PRN, placed **BRIGNAC** as Pharmacy 1’s PIC.

26. In or around September 2018, **BRIGNAC**, while Pharmacy 1 PIC, received from the TSBP a copy of the Red Flags Checklist, and a warning about his corresponding responsibility to ensure prescriptions were issued by a practitioner in the usual course of his professional practice, and for a legitimate medical purpose.

27. **BRIGNAC** filled purported prescriptions for hydrocodone and carisoprodol at Pharmacy 1, knowing that such prescriptions were not issued for a legitimate medical purpose by a practitioner acting within the usual course of professional practice.

28. In or around August 2019, law enforcement executed a search warrant at Ennis. Beginning after the search warrant, and continuing through in or around October 2019, **BRUCE** and Martin paused dispensing controlled substances from Ennis. Beginning in or around November 2019, however, **BRUCE** and Martin resumed dispensing hydrocodone and carisoprodol from Ennis, and operated Ennis in a similar way to how it operated before August 2019.

29. In or around February 2020, **BRUCE** through Pharmacist PRN, placed **BRIGNAC** as Ennis’s PIC.

30. After November 2019, Ennis continued dispensing hydrocodone to many of the same purported patients Ennis serviced before the August 2019 search. These and other purported patients were brought to Ennis by runners. **BRUCE**, **BRIGNAC**, and Martin knew and intended that dispensing to these purported patients was unauthorized.

31. **BRUCE**, **BRIGNAC**, and Martin knew and intended that many of the red flags identified on the Red Flags Checklist were present at Ennis.

32. **BRUCE** and **BRIGNAC** knew and intended that many of the same red flags that were present at Pharmacy 1 were also present at Ennis.

33. **BRUCE** and Martin set a quota of how many hydrocodone prescriptions Ennis would dispense every day. The quota ranged from six to eight hydrocodone prescriptions per day. **BRIGNAC** and other Ennis employees enforced **BRUCE** and Martin's quota, which they all knew and understood was arbitrary and deployed as a means to evade detection by law enforcement.

34. As PIC for Ennis, **BRIGNAC**, with the knowledge and direction of **BRUCE** and Martin, filled prescriptions for hydrocodone and carisoprodol that **BRIGNAC**, **BRUCE**, and Martin knew and intended were not authorized, in that they knew that the prescriptions were not issued for a legitimate medical purpose by physicians acting within the usual course of professional practice.

35. While **BRIGNAC** was working as Ennis's PIC, **BRIGNAC** agreed with **BRUCE** to also become PIC for Pharmacy 2, for the limited purpose of Pharmacy 2 receiving a TSBP license. **BRIGNAC** was Pharmacy 2's PIC less than a week in June 2020. **BRUCE** and **BRIGNAC** knew and intended that the purpose of **BRIGNAC** acting as PIC for Pharmacy 2 was to falsely convince TSBP that Pharmacy 2 had a pharmacist who was going to fill prescriptions at Pharmacy 2, without which TSBP would not issue a license for Pharmacy 2 to operate.

36. From in or around November 2019, and continuing through August 2020, **BRUCE**, **BRIGNAC**, and Martin, through Ennis, distributed and dispensed approximately 113,031 pills of hydrocodone 10-325 mg and 73,506 pills of carisoprodol 350 mg. Hydrocodone and carisoprodol made up approximately 99% of the controlled substance pills dispensed from Ennis.

37. **BRUCE** and Martin split the proceeds from the illegal cash sales of the hydrocodone and carisoprodol sold to runners and individuals posing as patients.

38. **BRUCE** paid **BRIGNAC** for acting as Ennis's PIC.

39. **BRUCE** and Martin agreed not to publicly disclose **BRUCE'S** ownership of Ennis.

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

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

40. 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.

41. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, Defendants,

JASON BRUCE and
GERREN BRIGNAC,

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, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

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

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

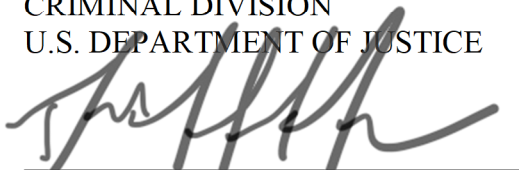
the United States of America shall be entitled to a money judgment and forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

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

A handwritten signature in dark ink, appearing to read 'Devon Helfmeyer', is written over a horizontal line.

DEVON HELFMEYER
TRIAL ATTORNEY
FRAUD SECTION, CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE