

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

43

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 24-CR-20520

v.

D-1 CHARLES WASSON, M.D.,  
D-2 MAURICE POTTS, M.D.,  
D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-6 LANISE GORTMAN,  
D-7 AARON ALONZO THOMAS,  
D-8 VALECIA VERNETTE-MICHEL LOGAN, and  
D-9 ANTOINE ARNOLD,  
D-10 USMAN AHMAD, R.PH.,  
D-11 DURAND BYNUM,  
D-12 EBONY DANIELS, and  
D-13 ALLEN SATAWHITE

Violation: 21 U.S.C. § 841(a)(1),  
21 U.S.C. § 846

Defendants.

FILED  
JUN 18 2025  
CLERK'S OFFICE  
DETROIT

**SECOND SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**GENERAL ALLEGATIONS**

At all times relevant to the Indictment:

1. P&A Aftercare LLC (P&A Aftercare), a purported medical clinic, was organized and operated first in Detroit, Michigan, and later in Southfield, Michigan.

2. The owner and operator of P&A Aftercare was SHARELENE DAWSON a/k/a SHARELENE CRAWFORD.

3. Drs. CHARLES WASSON, MAURICE POTTS, and BRUCE KAPLAN were licensed medical doctors in the State of Michigan and were authorized by the Drug Enforcement Administration (DEA) to prescribe Schedule II – V controlled substances by issuing prescriptions, provided that such prescriptions were issued in the usual course of their professional medical practice.

4. DESIREE KING was the manager at P&A Aftercare, and it was her role to run the day-to-day operations of the clinic, which purported to provide health services to patients.

5. Defendant USMAN AHMAD, R.Ph., was a licensed pharmacist in the State of Michigan and was authorized by the Drug Enforcement Administration to dispense Schedule II – V controlled substances from electronic prescriptions, provided that such prescriptions were issued in the usual course of professional medical practice. Defendant USMAN AHMAD, R.Ph. was the owner and operator of Detroit Hoover Pharmacy, located in Detroit, Michigan.

### **COUNT ONE**

(21 U.S.C. §§ 841(a)(1), 846 – Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances)

D-1 CHARLES WASSON, M.D.,  
D-2 MAURICE POTTS, M.D.,  
D-3 BRUCE KAPLAN, M.D.,

D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-6 LANISE GORTMAN,  
D-7 AARON ALONZO THOMAS,  
D-8 VALECIA VERNETTE-MICHEL LOGAN, and  
D-9 ANTOINE ARNOLD  
D-10 USMAN AHMAD, R.PH,  
D-11 DURAND BYNUM,  
D-12 EBONY DANIELS, and  
D-13 ALLEN SATAWHITE

6. The general allegations contained in paragraphs 1 through 4 are incorporated into this Count.

7. Beginning in or about June 2021, and continuing up to and including September 2024, in the Eastern District of Michigan, Southern Division, the defendants CHARLES WASSON, M.D., MAURICE POTTS, M.D., BRUCE KAPLAN, M.D., SHARELENE DAWSON a/k/a SHARELENE CRAWFORD, DESIREE KING, LANISE GORTMAN, AARON ALONZO THOMAS, VALECIA VERNETTE-MICHEL LOGAN, ANTOINE ARNOLD, USMAN AHMAD, R.Ph., DURAND BYNUM, EBONY DANIELS, and ALLEN SATAWHITE did knowingly, intentionally and unlawfully conspire and agree with each other to possess with intent to distribute and to distribute controlled substances, including but not limited to the Schedule II drug Oxycodone, the Schedule II drug Oxycodone-Acetaminophen (Percocet), and the Schedule II drug Hydrocodone-Acetaminophen (Norco). The prescription controlled substances were distributed

outside the usual course of professional practice and for no legitimate medical purpose, all in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

### **Object and Purpose of the Conspiracy**

8. The purpose of the conspiracy was for the physicians at P&A Aftercare to issue prescriptions for controlled substances that were not for the legitimate treatment of patients, paid for in cash or via peer-to-peer money transfer applications, that once filled at pharmacies were diverted to sales on the illegal market.

### **Manner and Means of the Conspiracy**

9. Beginning in or about June 2021, and continuing up to and including September 2024, in the Eastern District of Michigan, the defendants engaged in a scheme to unlawfully distribute prescription drug controlled substances in exchange for money. The defendants joined and participated in this conspiracy at different times, played different roles, and engaged in different aspects of the overall conspiracy.

10. As part of the conspiracy, SHARELENE DAWSON employed physicians and others for the purpose of unlawfully distributing controlled substance prescriptions.

11. As part of the conspiracy, Drs. WASSON, POTTS, and KAPLAN worked at P&A Aftercare and knowingly and intentionally prescribed controlled substances

outside the usual course of their professional practice and for no legitimate medical purpose, in furtherance of the scheme. Drs. WASSON, POTTS, and KAPLAN issued the prescriptions after a cursory examination, after a few questions but without a physical examination, or without any visit taking place between the physician and purported patient.

12. The opioid prescriptions issued by the physicians working at P&A Aftercare were not issued for the legitimate treatment of patients, but rather to unlawfully distribute controlled substance prescriptions. The illegally prescribed and distributed controlled substances included Oxycodone, Oxycodone-Acetaminophen (Percocet), and Hydrocodone-Acetaminophen (Norco). These drugs are in high demand on the illegal market. The approximate dosage units of controlled substances issued was more than 1.9 million, and the value on the illegal market, of the pills distributed was approximately \$28 million.

13. As part of the conspiracy, DESIREE KING communicated with patient recruiters and purported patients to take requests for prescriptions of controlled substances and transmit those requests to the doctors. Further, it was the role of DESIREE KING and others to collect cash payments or payments via peer-to-peer money transfer applications for issuance of the controlled substance prescriptions.

14. As part of the conspiracy, it was the role of LANISE GORTMAN, AARON ALONZO THOMAS, VALECIA VERNETTE-MICHEL LOGAN, ANTOINE

ARNOLD, DURAND BYNUM, EBONY DANIELS, and ALLEN SATAWHITE to serve as patient recruiters or marketers, who recruited and maintained a cadre of fake “patients” who received prescriptions from the doctors at P&A Aftercare. GORTMAN, THOMAS, LOGAN, ARNOLD, BYNUM, DANIELS, and SATAWHITE worked to get the prescriptions filled and kept the controlled substances to sell on the illegal market.

15. As part of the conspiracy, recruited “patients” were seen by Drs. WASSON, POTTS, and KAPLAN, if they were seen at all. SHARELENE DAWSON and DESIREE KING required all “patients” or their recruiters to pay cash or money via peer-to-peer money transfer applications for the prescriptions, and they charged different amounts of money depending on the quantity, type, and dosage of the prescription opioid that the patient recruiter/marketer requested and received. After a cursory examination, or a few questions but without a physical examination—or without any visit taking place between the medical professional and purported patient—Drs. WASSON, POTTS, or KAPLAN issued prescriptions for controlled substances, outside the usual course of their professional practice and for no legitimate medical purpose, to the “patients” recruited by LANISE GORTMAN, AARON ALONZO THOMAS, VALECIA VERNETTE-MICHEL LOGAN, ANTOINE ARNOLD, DURAND BYNUM, EBONY DANIELS, ALLEN SATAWHITE, and others.

16. After the controlled substance prescriptions were issued, many of these prescriptions were filled at Detroit Hoover Pharmacy, a cooperating pharmacy, by defendant AHMAD. Some of the controlled substances were then sold by defendants GORTMAN, THOMAS, LOGAN, and others for a profit on the illegal street market.

17. Before dispensing the controlled substance prescriptions pharmacist USMAN AHMAD, R.Ph., failed to exercise his corresponding professional responsibility to determine that the prescriptions were issued for a legitimate medical purpose by an individual practitioner acting in the usual course of professional practice.

18. As part of the conspiracy, Drs. WASSON, POTTS, and KAPLAN requested documentation such as MRI reports from patients, to give the appearance of legitimacy, but repeatedly prescribed controlled substances without receiving MRI reports. At times, DESIREE KING and others created and facilitated fraudulent urine drug screen reports and purported Michigan Automated Prescription System (“MAPS”) reports, to give the appearance of legitimacy, and they charged patient recruiters/marketers additional amounts of money for the fraudulent records.

19. As part of the conspiracy, Drs. WASSON, POTTS, and KAPLAN authorized electronic prescriptions for Schedule II controlled substances, which were issued under their DEA licenses. Drs. WASSON, POTTS, and KAPLAN also issued non-controlled maintenance medication prescriptions. The “maintenance” medications were prescribed to make the physicians’ prescribing practices appear more

legitimate, for example, by reducing their percentage of controlled substance prescriptions in comparison to non-controlled substance prescriptions. Most of the unlawful controlled substance prescriptions were paid for in cash. However, in addition, both controlled and non-controlled “maintenance” medication prescriptions were billed by pharmacies to health care benefit programs, to include Medicare and Medicaid.

**COUNTS TWO THROUGH THREE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-1 CHARLES WASSON, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-6 LANISE GORTMAN,  
D-10 USMAN AHMAD, R.Ph.

17. On or about each of the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants CHARLES WASSON, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, LANISE GORTMAN, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant AHMAD, in the names of individuals as follows:



COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
2	CHARLES WASSON, M.D. SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD) DESIREE KING LANICE GORTMAN USMAN AHMAD, R.Ph.	11/4/2022	11/4/2024	H.G.	Oxycodone 30 mg.	60
3	CHARLES WASSON, M.D. SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD) DESIREE KING LANICE GORTMAN USMAN AHMAD, R.Ph.	3/3/2023	3/3/2023	G.M.	Oxycodone 30 mg	60

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS FOUR THROUGH FIVE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-2 MAURICE POTTS, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-6 LANISE GORTMAN,  
D-10 USMAN AHMAD, R.Ph.

18. On or about each of the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, LANISE GORTMAN, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant AHMAD, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
4	<ul style="list-style-type: none"> <li>MAURICE POTTS, M.D.,</li> <li>SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD</li> </ul>	12/28/22	12/28/2022	G.M.	Oxycodone 30 mg.	60

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
	<ul style="list-style-type: none"> <li>• DESIREE KING</li> <li>• LANICE GORTMAN</li> <li>• USMAN AHAMD, R.Ph.</li> </ul>					
5	<ul style="list-style-type: none"> <li>• MAURICE POTTS, M.D.,</li> <li>• SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> <li>• LANICE GORTMAN</li> <li>• USMAN AHMAD, R.Ph.</li> </ul>	8/15/2023	8/16/2023	H.G.	Oxycodone 30 mg.	60

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS SIX THROUGH SEVEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-6 LANISE GORTMAN,  
D-10 USMAN AHAMD, R.Ph.

19. On or about each of the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants BRUCE KAPLAN, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, LANISE GORTMAN, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant AHMAD, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
6	<ul style="list-style-type: none"> <li>BRUCE KAPLAN, M.D.,</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE</li> </ul>	11/2/2023	12/6/2023	G.M.	Oxycodone 30 mg.	60

	CRAWFORD) • DESIREE KING • LANICE GORTMAN • USMAN AHMAD, R.Ph.					
7	• BRUCE KAPLAN, M.D., • SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD) • DESIREE KING • LANICE GORTMAN • USMAN AHMAD, R.Ph.	7/13/2023	7/13/2023	H.G.	Oxycodone 30 mg.	60

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT EIGHT**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
 D-4 SHARELENE DAWSON,  
     a/k/a SHARELENE CRAWFORD,  
 D-5 DESIREE KING,  
 D-6 LANISE GORTMAN,

20. On or about each the date set forth below, in the Eastern District of Michigan,  
 Southern Division, defendants BRUCE KAPLAN, M.D., SHARELENE DAWSON,

a/k/a SHARELENE CRAWFORD, DESIREE KING, and LANISE GORTMAN, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing a prescription outside the usual course of professional practice and for no legitimate medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
8	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.,</li> <li>• SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD</li> <li>• DESIREE KING</li> <li>• LANICE GORTMAN</li> </ul>	2/21/2024	4/10/2024	H.G.	Oxycodone 30 mg.	60

**COUNT NINE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-1 CHARLES WASSON, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-7 AARON THOMAS

18. On the date forth below, in the Eastern District of Michigan, Southern

Division, defendants CHARLES WASSON, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and AARON THOMAS, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
9	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>AARON THOMAS</li> </ul>	5/30/2023	6/2/2023	A.G.	Oxycodone-Acetaminophen 10 mg. - 325	75

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-2 MAURICE POTTS, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-7 AARON THOMAS,

19. On the date forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and AARON THOMAS, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
10	<ul style="list-style-type: none"> <li>MAURICE POTTS, M.D.,</li> <li>SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD</li> <li>DESIREE KING</li> <li>AARON THOMAS</li> </ul>	11/16/2023	11/20/2023	A.G.	Oxycodone-Acetaminophen 10 mg. -325	75

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT ELEVEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,



a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-7 AARON THOMAS,

20. On the date forth below, in the Eastern District of Michigan, Southern Division, defendants BRUCE KAPLAN, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and AARON THOMAS, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
11	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.,</li> <li>• SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> <li>• AARON THOMAS</li> </ul>	12/20/2023	12/21/2023	A.G.	Oxycodone-Acetaminophen 10 mg. -325	75

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWELVE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-2 MAURICE POTTS, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-7 AARON THOMAS,  
D-10 USMAN AHAMD, R.Ph.

21. On the date forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, AARON THOMAS, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant AHMAD, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
12	<ul style="list-style-type: none"> <li>MAURICE POTTS, M.D.,</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>AARON THOMAS</li> <li>USMAN AHMAD,</li> </ul>	8/20/2024	8/20/2024	S.J.	Oxycodone 30 MG.	60

	R.Ph.					
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All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THIRTEEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-7 AARON THOMAS,  
D-10 USMAN AHAMD, R.Ph.

22. On the date forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, AARON THOMAS, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant AHMAD, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
13	<ul style="list-style-type: none"> <li>BRUCE KAPLAN, M.D.,</li> <li>SHARELENE DAWSON,</li> </ul>	7/17/2024	7/20/2024	S.J.	Oxycodone 30 mg.	60

	(a/k/a SHARELENE CRAWFORD) • DESIREE KING • AARON THOMAS • USMAN AHMAD, R.Ph.					
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All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOURTEEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-1 CHARLES WASSON, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-8 VALECIA VERNETTE-MICHEL LOGAN,  
D-10 USMAN AHMAD, R.Ph.

23. On or about the date set forth below, in the Eastern District of Michigan, Southern Division, defendants CHALRES WASSON, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, VALECIA VERNETTE-MICHEL LOGAN, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant

AHMAD, in the name of the individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
14	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>VALECIA VERNETTE-MICHEL LOGAN</li> <li>USMAN AHMAD, R.Ph.</li> </ul>	5/8/2023	5/8/2023	J.R.	Oxycodone-Acetaminophen 10 mg. - 325	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FIFTEEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-8 VALECIA VERNETTE-MICHEL LOGAN,  
D-10 USMAN AHMAD, R.Ph.

24. On or about the date set forth below, in the Eastern District of Michigan,  
Southern Division, defendants BRUCE KAPLAN, M.D., SHARELENE DAWSON,

a/k/a SHARELENE CRAWFORD, DESIREE KING, VALECIA VERNETTE-MICHEL LOGAN, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant AHMAD, in the name of the individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
15	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.</li> <li>• SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> <li>• VALECIA VERNETTE-MICHEL LOGAN</li> <li>• USMAN AHMAD, R.Ph.</li> </ul>	4/25/2024	4/25/2024	J.R.	Oxycodone 30 mg.	60

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT SIXTEEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-2 MAURICE POTTS, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-8 VALECIA VERNETTE-MICHEL LOGAN,  
D-10 USMAN AHAMD, R.Ph.

25. On or about the date set forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, VALECIA VERNETTE-MICHEL LOGAN, and USMAN AHMAD, R.Ph. did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, and transferring the prescriptions so they could be filled by defendant AHMAD, in the name of the individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
16	<ul style="list-style-type: none"> <li>MAURICE POTTS, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>VALECIA VERNETTE-</li> </ul>	6/24/2024	6/24/2024	J.R.	Oxycodone 30 mg.	60

	MICHEL LOGAN • USMAN AHMAD, R.Ph.					
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All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS SEVENTEEN THROUGH EIGHTEEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-9 ANTOINE ARNOLD,

26. On or about the date set forth below, in the Eastern District of Michigan, Southern Division, defendants, BRUCE KAPLAN, M.D., DESIREE KING, and ANTOINE ARNOLD, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the name of the individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
17	• BRUCE KAPLAN,	4/2/2024	4/4/2024	S.T.	Oxycodone 30 mg.	90



	M.D. • SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD) • DESIREE KING • ANTOINE ARNOLD					
18	• BRUCE KAPLAN, M.D. • SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD) • DESIREE KING • ANTOINE ARNOLD	5/28/2024	5/31/2024	S.T.	Oxycodone 30 mg	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT NINETEEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-1 CHARLES WASSON, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-11 DURAND BYNUM

27. On or about the date set forth below, in the Eastern District of Michigan,  
Southern Division, defendants CHARLES WASSON, M.D., SHARELENE

DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and DURAND BYNUM did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
19	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>DURAND BYNUM</li> </ul>	9/5/2024	9/10/2024	L.T.	Oxycodone 30 mg.	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS TWENTY – TWENTY-ONE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-2 MAURICE POTTS, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-11 DURAND BYNUM

28. On or about the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and DURAND BYNUM did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
20	<ul style="list-style-type: none"> <li>MAURICE POTTS, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>DURAND BYNUM</li> </ul>	4/12/2023	4/12/2023	L.T.	Oxycodone 30 mg.	90
21	<ul style="list-style-type: none"> <li>MAURICE POTTS, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>DURAND BYNUM</li> </ul>	1/24/2024	1/26/2024	L.T.	Oxycodone 30 mg.	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS TWENTY-TWO THROUGH TWENTY-THREE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-11 DURAND BYNUM

29. On or about the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants BRUCE KAPLAN, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and DURAND BYNUM did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
22	<ul style="list-style-type: none"> <li>BRUCE KAPLAN, M.D.</li> <li>SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD</li> <li>DESIREE KING</li> </ul>	6/1/2023	6/5/2023	L.T.	Oxycodone 30 mg.	90

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
	• DURAND BYNUM					
23	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.</li> <li>• SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> <li>• DURAND BYNUM</li> </ul>	9/5/2024	9/5/2024	L.T.	Oxycodone 30 mg.	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS TWENTY-FOUR THROUGH TWENTY-FIVE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-1 CHARLES WASSON, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-12 EBONY DANIELS

30. On or about the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants CHARLES WASSON, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and EBONY DANIELS did knowingly, intentionally, and unlawfully distribute and aid and abet

each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the names of individuals as follows:

<b>COUNT</b>	<b>DEFENDANT</b>	<b>ISSUED ON OR ABOUT</b>	<b>FILLED ON OR ABOUT</b>	<b>PATIENT</b>	<b>CONTROLLED SUBSTANCE</b>	<b>DOSAGE UNITS</b>
24	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>EBONY DANIELS</li> </ul>	4/22/2022	4/22/2022	D.C.	Oxycodone 30 mg.	75
25	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>EBONY DANIELS</li> </ul>	9/13/2022	9/13/2022	D.C.	Oxycodone 30 mg.	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWENTY-SIX**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-2 MAURICE POTTS, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-12 EBONY DANIELS

31. On or about the date set forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and EBONY DANIELS did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
26	<ul style="list-style-type: none"> <li>MAURICE POTTS, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> <li>EBONY DANIELS</li> </ul>	4/10/2023	4/10/2023	D.C.	Oxycodone 30 mg.	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWENTY-SEVEN**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-1 CHARLES WASSON, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-13 ALLEN SATAWHITE

32. On the date forth below, in the Eastern District of Michigan, Southern Division, defendants CHARLES WASSON, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and ALLEN SATAWHITE did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
27	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.</li> <li>SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE</li> </ul>	4/30/2024	4/30/2024	D.H.	Oxycodone-Acetaminophen 10 mg. - 325	90



COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
	KING • ALLEN SATAWHITE					

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWENTY-EIGHT**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,  
D-13 ALLEN SATAWHITE

33. On the date forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and ALLEN SATAWHITE did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
28	• MAURICE POTTS, M.D., • SHARELENE	8/28/2024	8/29/2024	D.H.	Oxycodone- Acetaminophen 10 mg. -325	90

	DAWSON, (a/k/a SHARELENE CRAWFORD) • DESIREE KING • ALLEN SATAWHITE					
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All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWENTY-NINE**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
 18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
 D-4 SHARELENE DAWSON,  
     a/k/a SHARELENE CRAWFORD,  
 D-5 DESIREE KING,  
 D-7 ALLEN SATAWHITE

34. On the date forth below, in the Eastern District of Michigan, Southern Division, defendants BRUCE KAPLAN, M.D., SHARELENE DAWSON, a/k/a SHARELENE CRAWFORD, DESIREE KING, and ALLEN SATAWHITE did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the name of individual as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
29	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.,</li> <li>• SHARELENE DAWSON, (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> <li>• ALLEN SATAWHITE</li> </ul>	12/22/2023	12/22/2023	D.H	Oxycodone-Acetaminophen 10 mg. -325	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS THIRTY THROUGH THIRTY-SIX**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-3 BRUCE KAPLAN, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,

35. On or about each of the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants BRUCE KAPLAN, M.D., SHARELENE DAWSON a/k/a SHARELENE CRAWFORD, and DESIREE KING, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate

medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
30	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.,</li> <li>• SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> </ul>	6/21/2023	6/21/2023	D.S.	Oxycodone-Acetaminophen 10 mg. - 325	70
31	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.,</li> <li>• SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> </ul>	6/21/2023	6/21/2023	D.W.	Oxycodone 30 mg.	75
32	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.,</li> <li>• SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD)</li> <li>• DESIREE KING</li> </ul>	7/11/2024	7/11/2024	D.W.	Oxycodone 30 mg.	75
33	<ul style="list-style-type: none"> <li>• BRUCE KAPLAN, M.D.,</li> <li>• SHARELENE</li> </ul>	7/11/2024	7/11/2024	D.A.	Oxycodone-Acetaminophen 10 mg. - 325	60

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
	DAWSON (a/k/a SHARELENE CRAWFORD) • DESIREE KING					
34	• BRUCE KAPLAN, M.D., • SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD) • DESIREE KING	7/11/2024	7/11/2024	R.P.	Oxycodone- Acetaminophen 10 mg. -325	60
35	• BRUCE KAPLAN, M.D., • SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD) • DESIREE KING	7/11/2024	7/11/2024	J.C.	Oxycodone- Acetaminophen 10 mg. -325	60
36	• BRUCE KAPLAN, M.D., • SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD)	9/3/2024	9/3/2024	D.S.	Oxycodone- Acetaminophen 10 mg. - 325	90

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
	• DESIREE KING					

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS THIRTY-SEVEN THROUGH THIRTY-EIGHT**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances

18 U.S.C. § 2 – Aiding and Abetting)

D-2 MAURICE POTTS, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,

36. On or about each of the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants MAURICE POTTS, M.D., SHARELENE DAWSON a/k/a SHARELENE CRAWFORD, and DESIREE KING, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no legitimate medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
37	• MAURICE POTTS, M.D., • SHARELENE DAWSON	10/31/2023	10/31/2023	D.W.	Oxycodone 30 mg.	75

	(a/k/a SHARELENE CRAWFORD) • DESIREE KING					
38	• MAURICE POTTS, M.D., • SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD) • DESIREE KING	12/19/2023	12/19/2023	D.S.	Oxycodone- Acetaminophen 10 mg. - 325	90

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNTS THIRTY-NINE THROUGH FORTY**

(21 U.S.C. § 841(a)(1) – Unlawful Distribution of Controlled Substances  
18 U.S.C. § 2 – Aiding and Abetting)

D-1 CHARLES WASSON, M.D.,  
D-4 SHARELENE DAWSON,  
a/k/a SHARELENE CRAWFORD,  
D-5 DESIREE KING,

37. On or about each of the dates set forth below, in the Eastern District of Michigan, Southern Division, defendants CHARLES WASSON, M.D., SHARELENE DAWSON a/k/a SHARELENE CRAWFORD, and DESIREE KING, did knowingly, intentionally, and unlawfully distribute and aid and abet each other in distributing the identified prescription drug controlled substances by authorizing prescriptions outside the usual course of professional practice and for no

legitimate medical purpose, in the names of individuals as follows:

COUNT	DEFENDANT	ISSUED ON OR ABOUT	FILLED ON OR ABOUT	PATIENT	CONTROLLED SUBSTANCE	DOSAGE UNITS
39	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.,</li> <li>SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> </ul>	2/27/2024	2/27/2024	D.A.	Oxycodone-Acetaminophen 10 mg. - 325	60
40	<ul style="list-style-type: none"> <li>CHARLES WASSON, M.D.,</li> <li>SHARELENE DAWSON (a/k/a SHARELENE CRAWFORD)</li> <li>DESIREE KING</li> </ul>	6/13/2024	6/13/2024	D.S.	Oxycodone-Acetaminophen 10 mg. - 325	90

All in violation of Title 21, United States Code, Section 841(a)(1).

### **FORFEITURE ALLEGATIONS**

(21 U.S.C. § 853 – Criminal Forfeiture)

27. The allegations set forth above in this Indictment are hereby incorporated by reference as if they were set forth in full herein for the purpose of alleging forfeiture against each defendant pursuant to 21 U.S.C. § 853.

28. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of



the controlled substance offense in violation of Title 21, as alleged in Count One of this Indictment, the convicted defendant(s) shall forfeit to the United States: (a) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation; and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

29. Money Judgment: As part of the forfeiture in this case, the government intends to seek a forfeiture money judgment against the charged defendants. Upon conviction of violating Title 21, United States Code, Sections 841(a)(1), 846, defendants shall be ordered to pay the United States a sum of money equal to the total amount of property subject to forfeiture, including proceeds defendants obtained as a result of such violation and property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

30. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold, 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 that cannot be divided  
without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek to forfeit  
any property of the defendants up to the value of the forfeitable property described  
above.

THIS IS A TRUE BILL

s/GRAND JURY FOREPERSON

JEROME F. GORGON, JR.  
United States Attorney

s/RYAN A. PARTICKA  
Chief, White Collar Crime Unit  
Assistant United States Attorney

s/REGINA R. MCCULLOUGH  
Assistant United States Attorney  
211 W. Fort Street, Ste. 2001  
Detroit, Michigan 48226  
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Regina.McCullough@usdoj.gov

s/PHILIP A. ROSS  
Assistant United States Attorney  
211 W. Fort Street, Ste. 2001  
Detroit, Michigan 48226  
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Philip.Ross@usdoj.gov

Dated: June 18, 2025