

UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

United States of America

v.

Deborah Lanell White

Case No.

1:26MJ198

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2020 - July 2025 in the county of Guilford and elsewhere in the  
Middle District of North Carolina, the defendant(s) violated:

Code Section

18 U.S.C. §1347(a)

Offense Description

Health Care Fraud

This criminal complaint is based on these facts:

See attached Affidavit of HHS-OIG Special Agent Eric Wiggam.

☒ Continued on the attached sheet.

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Criminal Complaint and attached affidavit in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date:

6/22/2026 9:26 AM

City and state:

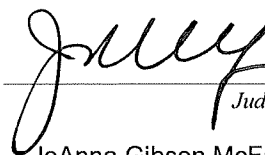
Durham, North Carolina

/s/ Eric Wiggam

Complainant's signature

Eric Wiggam, Special Agent, HHS-OIG

Printed name and title



Judge's signature

JoAnna Gibson McFadden, U.S. Magistrate Judge

Printed name and title

## **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Eric Wiggam, a Special Agent with the Department of Health and Human Services Office of Inspector General (HHS-OIG), being duly sworn, hereby depose and state as follows:

1. I am investigating a health care fraud scheme to bill Medicaid for fictitious urine drug tests purportedly performed by Reginald Center of Turn Around (RCOTA), a non-profit corporation operated by Deborah Lanell White.

2. This affidavit is made in support of a criminal complaint against Deborah Lanell White charging that, from in or about December 2020 to in or about July 2025, in Guilford County, Alamance County, and elsewhere, White knowingly and willfully executed a scheme or artifice in violation of Title 18 USC § 1347(a).

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

4. The facts set forth in this affidavit come from my personal observation, information relayed to me by other investigators, and information obtained from reports and business records. Based on the facts, in conjunction with my training and experience, I submit that there is probable cause to believe that a violation of Title 18 USC § 1347(a) occurred within the Middle District of North Carolina.

### **Agent Background**

5. I am a “federal law enforcement officer” within the meaning of Rule 41(a) of the Federal Rules of Criminal Procedure. I have been a Special Agent with HHS-OIG since May 2016. My education includes a master’s degree in Criminal Justice with a concentration in Emergency Management and Homeland Security. I am a Certified Fraud Examiner. I also served

four years of active-duty service in the U.S. Marine Corps, including two combat tours in support of Operation Iraqi Freedom as a Combat Engineer.

#### **North Carolina Medicaid and Urine Drug Tests**

6. The North Carolina Medicaid Program (Medicaid) is a state-administered health care benefit program designed to provide medical assistance to low-income families and children. It is financed by federal and state funds. Medicaid is administered by the North Carolina Department of Health and Human Services, Division of Health Benefits (DHB). Medicaid is a “health care benefit program,” as defined in Title 18, United States Code, Section 24(b).

7. Medicaid functions like a medical insurance plan by defraying the cost of receiving covered and medically necessary services. If qualified, an individual can enroll as a Medicaid beneficiary. At the time of enrollment, a beneficiary receives a unique alphanumeric code issued by the program known as a Medicaid identification number. Beneficiaries use their Medicaid identification numbers to receive covered services.

8. A Medicaid provider is any individual or entity that provides services to Medicaid beneficiaries pursuant to a provider agreement with DHB. For a provider to obtain reimbursement from Medicaid for providing services to a Medicaid beneficiary, the provider electronically submits a claim through NCTracks, North Carolina’s Medicaid Management Information System, containing their National Provider Identifier (“NPI”) number,<sup>1</sup> the beneficiary’s Medicaid identification number, the date of service, codes describing services rendered and supporting diagnoses, and charges for the services rendered.

---

<sup>1</sup> Every provider who participates in Medicaid must have a unique NPI that can be used to identify claims filed and monies paid to a certain provider. The billing provider NPI is the NPI of the person or entity that should be paid for the services. The rendering provider NPI is the NPI of the provider who performed the billed services for the Medicaid recipient.

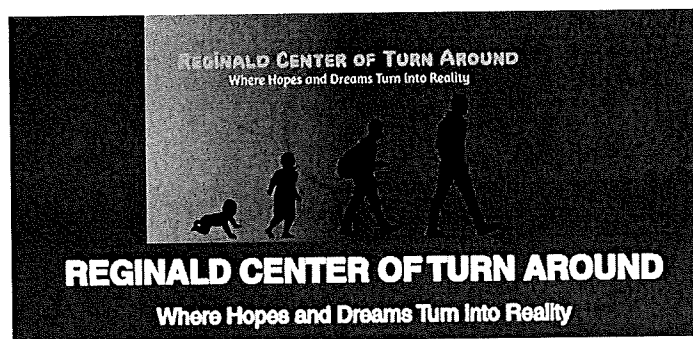
9. There are two main categories of urine drug tests covered by Medicaid: (1) presumptive urine drug tests and (2) definitive urine drug tests. A presumptive urine drug test determines the presence or absence of a drug class in a urine sample. A definitive urine drug test identifies specific drugs, illicit substances, and their metabolites in a urine sample. The reimbursement rate for a definitive urine drug test is greater than that of a presumptive drug test and is dependent on the number of drug classes tested for.

10. The North Carolina Division of Health Benefits issued a policy governing when Medicaid will reimburse providers for urine drug testing. The testing policy provides in relevant part that urine drug testing must be medically necessary, performed at random intervals, and the reasons for performing such test must be documented. In general, it is not medically necessary to perform a definitive drug test when the presumptive drug test does not indicate the presence of a controlled substance, unless the result is inconsistent with the beneficiary's self-report or other information known to the provider. Likewise, based on my training and experience, there is generally no medical necessity to simultaneously perform both a presumptive and definitive drug test because the results of the presumptive drug test should be reviewed before a definitive drug test is performed.

#### **Reginald Center of Turn Around**

11. Reginald Center of Turn Around (RCOTA) was formed in 2013 as a nonprofit corporation. Deborah Lanell White (White) is listed as the registered agent and a director. Records filed by White with the North Carolina Secretary of State indicate that RCOTA's address was on W. Meadowview Road in Greensboro from 2016 to February 2022. In 2022, White filed a document updating RCOTA's registered address to N. Mebane Street in Burlington. The document lists White as the registered agent and president.

12. Since at least October 2020, RCOTA's website has advertised its services as Substance Abuse Intensive Outpatient Program, Substance Abuse Comprehensive Outpatient Treatment, Office-Based Opioid Treatment, Counseling & Mentoring, and Community Outreach. ([www.rcota.org/programs](http://www.rcota.org/programs)). During the same period, the website has identified White as RCOTA's founder and featured her picture. ([www.rcota.org/programs](http://www.rcota.org/programs)). The current iteration of RCOTA's website contains an "About Us" page that identifies White as RCOTA's founder. The website depicts the following graphic.



According to the website, RCOTA's mission is:

to develop, manage, and oversee the services that are provided within the organization, providing quality healthcare services to persons aged 7 and older, incorporating healthcare services that encompass consumer's families and respective communities. The services that are provided are culturally relevant, evidenced-based, and person-centered, providing prevention, intervention, resiliency, and recovery services that impacts not only the consumers themselves, but the families of the consumers, and the overall community.

13. RCOTA first entered into an agreement with DHB to provide Medicaid services in 2016. Over the last eight years, on a routine and recurring basis, White submitted electronically signed DHB agreements and forms listing White as the Owner/Office Administrator of RCOTA. Between 2017 and 2025, RCOTA was licensed by DHB to provide Psychosocial Rehabilitation, Substance Abuse Intensive Outpatient Program, and Community/Behavioral Health services. Over time, these documents have listed addresses in Greensboro, Burlington, and Mooresville as RCOTA's business location.

### Urine Drug Testing

14. RCOTA was paid \$2,828,545 by Medicaid for over 20,000 urine drug tests (UDT) purportedly performed between December 2020 and July 2025 and billed during the same period.<sup>2</sup> The claims submitted to Medicaid by RCOTA identified four rendering providers as shown in the table below.

| <u>Rendering Provider</u> | <u>First UDT Service</u> | <u>Last UDT Service</u> | <u>Presumptive Tests</u> | <u>Definitive Tests</u> | <u>Total Paid</u> |
|---------------------------|--------------------------|-------------------------|--------------------------|-------------------------|-------------------|
| Doctor-1                  | 12/01/2020               | 10/18/2021              | 4902                     | 4929                    | \$1,384,164       |
| NP-1                      | 12/07/2020               | 03/11/2021              | 891                      | 890                     | \$250,976         |
| NP-2                      | 08/30/2021               | 05/05/2023              | 2854                     | 2878                    | \$771,361         |
| Doctor-2                  | 03/28/2023               | 07/23/2025              | 1555                     | 1579                    | \$422,044         |
|                           |                          |                         | 10,202                   | 10,276                  | \$2,828,545       |

15. When interviewed by investigators, Doctor-1 recalled that, in approximately 2016, he engaged in negotiations with RCOTA to be medical director. An agreement was never reached. He explained that he negotiated with the manager of RCOTA and White, the owner of RCOTA. Doctor-1 stated that he never saw any patients for RCOTA, did not recall being paid by RCOTA, and did not recall ever ordering urine drug tests for RCOTA patients.<sup>3</sup>

16. When interviewed by investigators, Nurse Practitioner-1 (NP-1) said that she worked for RCOTA as a nurse practitioner one day a week for approximately two months in 2021. She provided medication assisted therapy. NP-1 explained that, at the time that she was working at

---

<sup>2</sup> RCOTA submitted claims for over \$3,000,000 worth of UDT testing during this time.

<sup>3</sup> A review of RCOTA's bank records shows that RCOTA made five payments to Doctor-1 via Zelle. In January 2021, Doctor-1 received \$.01 from RCOTA. Between April and June of 2021, Doctor-1 received four payments from RCOTA totaling \$5,807.65.

RCOTA, Doctor-1 was her supervising collaborative physician.<sup>4</sup> NP-1 believed that Doctor-1 worked for RCOTA in some fashion. NP-1 stated that Doctor-1 hired NP-1 to work at RCOTA and paid her via direct deposit. NP-1 did not physically work at the RCOTA clinic. She provided services to less than fifteen patients per week and many of the patients were “no shows.” NP-1 stated that she reviewed the results of urine drug tests but never ordered any such tests. When shown a copy of the urine drug test claims attributed to her by her NPI number, NP-1 stated that she was unaware of the claims, nor did she recognize the associated billing codes.

17. When interviewed by investigators, Nurse Practitioner-2 (NP-2) stated that he never worked for RCOTA and never provided services to RCOTA patients. When asked about the urine drug tests that he purportedly ordered, he said that he never ordered any such tests for a RCOTA patient. In approximately 2022, NP-2 had a conversation with White about potentially working at RCOTA. White told NP-2 that the RCOTA program director was working on getting RCOTA credentialed and that RCOTA would reach out to NP-2 with more details. NP-2 explained that, by the time the program director reached out, NP-2 was too busy to take on any work. Both Doctor-1 and Doctor-2 have acted as a supervisor for NP-2.

18. Doctor-2 told investigators that he has never worked at RCOTA and has never ordered a urine drug test for RCOTA. Doctor-2 said that he saw RCOTA information from 2016 listed in his NCTracks account but did not know the origin. After being shown a list of purported

---

<sup>4</sup> A collaborative practice agreement is a mutual contract between a nurse practitioner (NP) and their supervising physician which defines what the NP can do within their current practice site. The agreement identifies the drugs, devices, medical treatments, tests, and procedures that may be prescribed, ordered, and performed, as would be appropriate for the diagnosis and treatment of the common medical problems seen in the NP's practice. The agreement must state how the continuous availability of the supervising physician will be provided for ongoing supervision, consultation, collaboration, referral, and evaluation of care provided by the NP. The NP and supervising physician are not required to work for the same entity.

RCOTA beneficiaries that were associated with urine drug test Medicaid claims listing Doctor-2 as the provider, he explained that he was not familiar with any of the names. He would not order a urine drug test for a patient that he hasn't seen. Doctor-2 stated that he does not know White.

19. In total, RCOTA purported to provide urine drug testing to 347 different beneficiaries. Investigators interviewed ten of the beneficiaries, none of whom recalled ever receiving a urine drug test from RCOTA. The beneficiaries and associated billed-for tests are shown in the table below:

| <u>Beneficiary</u> | <u>First UDT Service</u> | <u>Last UDT Service</u> | <u>Presumptive Tests</u> | <u>Definitive Tests</u> | <u>Total Paid</u> |
|--------------------|--------------------------|-------------------------|--------------------------|-------------------------|-------------------|
| B-1                | 05/25/21                 | 06/30/21                | 4                        | 4                       | \$1,127           |
| B-2                | 12/08/20                 | 03/20/24                | 43                       | 43                      | \$11,800          |
| B-3                | 03/01/21                 | 05/20/21                | 24                       | 24                      | \$6,765           |
| B-4                | 03/06/23                 | 03/13/24                | 48                       | 48                      | \$12,887          |
| B-5                | 02/06/23                 | 04/17/24                | 48                       | 48                      | \$12,887          |
| B-6                | 12/07/20                 | 06/28/24                | 76                       | 76                      | \$20,807          |
| B-7                | 03/03/25                 | 07/23/25                | 32                       | 32                      | \$8,495           |
| B-8                | 12/07/20                 | 05/08/24                | 69                       | 69                      | \$19,062          |
| B-9                | 12/09/20                 | 03/20/24                | 56                       | 56                      | \$15,142          |
| B-10               | 01/03/22                 | 10/05/22                | 46                       | 46                      | \$12,350          |

20. For example, when interviewed by investigators, B-2 stated B-2 has never been to RCOTA and never used drugs. B-2 recalled taking a urine drug test for a job but hasn't taken one since 2019. When B-5 was asked about the urine drug tests that B-5 reportedly received, B-5 stated, "no . . . that definitely wouldn't have been me . . . I would have known that." When B-7 was asked the same, B-7 responded, "64 drug tests is crazy." B-8 stated that B-8 was not familiar with RCOTA

or the doctor who purportedly ordered the tests associated with B-8. In reference to the urine drug tests B-8 reportedly received, B-8 said, "I don't know what that's about." B-6 explained that B-6 "never" received medical services from RCOTA. B-6 further explained that B-6 resided in Mexico for the entirety of 2021 when RCOTA purported to perform some of the tests.

21. When interviewed by investigators, B-9's parent explained that B-9 has special needs due to Autism. When asked about the 112 urine drug tests provided by RCOTA to B-9, B-9's parent stated, "oh heck no" and explained that B-9 has never given a urine sample except for bladder infection tests at a doctor's office. B-9's parent had never heard of RCOTA.

#### **Former RCOTA Employees**

22. Employee-1 worked part-time at RCOTA from October 2022 to June 2023 as a mental health counselor. Employee-1 identified White as the owner of RCOTA. When asked about urine drug testing, Employee-1 told investigators that she was not aware of any such testing performed by RCOTA. Employee-1 did not recognize the names of Doctor-1, NP-1, NP-2, or Doctor-2 as practicing at or otherwise affiliated with RCOTA.

23. Employee-2 worked full-time at RCOTA from December 2022 to July 2023. Initially Employee-2 was employed as the lead mental health counselor and assistant program manager. Employee-2 was later promoted to the position of program manager. Employee-2 identified White as the owner of RCOTA. Employee-2 worked at a Greensboro location of RCOTA. Employee-2 explained to investigators that, despite advertising otherwise, RCOTA "never did" substance abuse treatment. To Employee-2's knowledge, RCOTA did not perform laboratory testing of any kind including blood, urine, or anything else either in or out of house. Employee-2 observed some laboratory-related equipment at RCOTA, however, Employee-2 never observed the equipment being used. Employee-2 stated that White was the only person at RCOTA that dealt with

billing or NCTracks issues. Employee-2 stated that there were no doctors overseeing operations at RCOTA. He did not recognize the names of Doctor-1 or Doctor-2. He had heard the names of NP-1 and NP-2, but, to his knowledge, they did not work for RCOTA while he was employed there.

#### **Financial Accounts**

24. From December 2020 to October 2021, Medicaid paid RCOTA via electronic funds transfer to a RCOTA checking account at BB&T. The account was opened in December 2020. Signature authority documents dated January 2021 list both White and Gwendolyn Singleton.<sup>5</sup> White is listed as “CEO.”

25. From October 2021 to November 2023, Medicaid paid RCOTA via electronic funds transfer to a RCOTA checking account at Truliant Federal Credit Union. The account was opened in October 2021. White certified that she is the sole owner of RCOTA and is the sole signatory on the checking account. In February 2023, White updated RCOTA’s address with Truliant from a N. Mebane Street address to a S. Mebane Street address in Burlington.

26. From December 2023 through 2025, Medicaid paid RCOTA via electronic funds transfer to a RCOTA checking account at Wells Fargo. The account was opened in July 2023. The application lists White as the “owner” of RCOTA and she is the sole signatory on the checking account.

#### **NCTracks Submission IP Address**

27. RCOTA submitted a total of over 50 urine drug test claims via NCTracks on January 5, 2024, January 18, 2024, and March 28, 2024. The claims were submitted from IP address 104.8.149.110. AT&T records show that, on those dates, IP address 104.8.149.110 was assigned to

---

<sup>5</sup> Singleton is currently charged by indictment in 1:26cr63 with multiple counts of 18 U.S.C. § 1347 for billing for fictitious urine drug tests via Joelle’s Center of Hope, Inc.

a residence in McLeansville, North Carolina. The records list White's mother as the service subscriber. White's current driver license, issued in May 2024, lists her address as the same McLeansville residence. Beginning in August 2024, White's personal Navy Federal Credit Union bank statements are addressed to the McLeansville residence.

### **Conclusion**

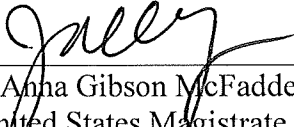
28. Based on the facts set forth above, I submit that there is probable cause to believe that, from in or about December 2020 to in or about July 2025, in Guilford County, Alamance County, and elsewhere, Deborah Lanell White knowingly and willfully executed a scheme or artifice in violation of Title 18 USC § 1347(a).

Respectfully Submitted,

/s/ Eric Wiggam  
Eric Wiggam, Special Agent  
HHS-OIG

Dated: June 22, 2026 *9:26 am*

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of this written affidavit.

  
\_\_\_\_\_  
JoAnna Gibson McFadden  
United States Magistrate Judge  
Middle District of North Carolina