

2018 JUN -5 P 3:47

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAMEKA SIMPSON,  
ERIC JASPER, and  
BRITTANY WASHINGTON,

Defendants.

**SEALED**

STEPHEN U. BRIES  
CLERK

**18-CR-124**

Case No. 18-CR-  
[18 U.S.C. §§ 2, 1028A(a)(1)  
and 21 U.S.C. § 843(a)(3)]

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**INDICTMENT**

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**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about September 27, 2016, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON**

knowingly and intentionally obtained oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, to wit, by presenting what she knew to be a fraudulent prescription for oxycodone at a retail pharmacy.

All in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about September 27, 2016, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON,**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(4) – to wit, Title 18, United States Code, Section 1001 (false statements) – did knowingly transfer, use, and possess, without lawful authority, means of identification of another person.

2. The means of identification consisted of the name of the medical professional who purportedly issued the prescription that is the subject of Count One (“B.J-F.”), and the unique number assigned to that medical professional by the Drug Enforcement Administration (DEA).

3. The prescription was a false, fictitious, and fraudulent statement and representation, made knowingly and willfully in a matter within the jurisdiction of the executive branch of the government of the United States: to-wit, the prescribing of controlled substances regulated by the federal Drug Enforcement Administration.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 12, 2017, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON and  
ERIC JASPER**

knowingly and intentionally obtained oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, to wit, by presenting what they knew to be a fraudulent prescription for oxycodone at a retail pharmacy.

All in violation of Title 21, United States Code, Section 843(a)(3), and Title 18, United States Code, Section 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about May 12, 2017, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON and  
ERIC JASPER,**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(4) – to wit, Title 18, United States Code, Section 1001 (false statements) – did knowingly transfer, use, and possess, without lawful authority, means of identification of another person.

2. The means of identification consisted of the name of the medical professional who purportedly issued the prescription that is the subject of Count Three (“B.J-F.”), and the unique number assigned to that medical professional by the Drug Enforcement Administration (DEA).

3. The prescription was a false, fictitious, and fraudulent statement and representation, made knowingly and willfully in a matter within the jurisdiction of the executive branch of the government of the United States: to-wit, the prescribing of controlled substances regulated by the federal Drug Enforcement Administration.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 18, 2017, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON and  
BRITTANY WASHINGTON**

knowingly and intentionally obtained oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, to wit, by presenting what they knew to be a fraudulent prescription for oxycodone at a retail pharmacy.

All in violation of Title 21, United States Code, Sections 843(a)(3), and Title 18, United States Code, Section 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about August 18, 2017, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON  
and BRITTANY WASHINGTON**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(4) – to wit, Title 18, United States Code, Section 1001 (false statements) – did knowingly transfer, use, and possess, without lawful authority, means of identification of another person.

2. The means of identification consisted of the name of the medical professional who purportedly issued the prescription that is the subject of Count Five (“B.J-F.”), and the unique number assigned to that medical professional by the Drug Enforcement Administration (DEA).

3. The prescription was a false, fictitious, and fraudulent statement and representation, made knowingly and willfully in a matter within the jurisdiction of the executive branch of the government of the United States: to-wit, the prescribing of controlled substances regulated by the federal Drug Enforcement Administration.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 25, 2017, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON and  
BRITTANY WASHINGTON**

knowingly and intentionally obtained oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, to wit, by presenting what they knew to be a fraudulent prescription for oxycodone at a retail pharmacy.

All in violation of Title 21, United States Code, Section 843(a)(3), and Title 18, United States Code, Section 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about August 25, 2017, in the State and Eastern District of Wisconsin,

**KAMEKA SIMPSON  
and BRITTANY WASHINGTON,**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(4) – to wit, Title 18, United States Code, Section 1001 (false statements) – did knowingly transfer, use, and possess, without lawful authority, means of identification of another person.

2. The means of identification consisted of the name of the medical professional who purportedly issued the prescription that is the subject of Count Seven (“B.J-F.”), and the unique number assigned to that medical professional by the Drug Enforcement Administration (DEA).

3. The prescription was a false, fictitious, and fraudulent statement and representation, made knowingly and willfully in a matter within the jurisdiction of the executive branch of the government of the United States: to-wit, the prescribing of controlled substances regulated by the federal Drug Enforcement Administration.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL:

[REDACTED]

FOREPERSON

Date: 6/5/18

  
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MATTHEW D. KRUEGER  
United States Attorney