

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED 10-17-2018
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 18-138
v. * SECTION: I
JARROD ANDREW DOUBLEDAY *
* * *

FACTUAL BASIS

Should this matter have gone to trial, the government would have proved through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in Count 1, Object 1, of the indictment now pending against the defendant, **JARROD ANDREW DOUBLEDAY**, charging him with a violation of Title 21, United States Code, Sections 846 and 843(a)(3), namely, conspiracy to acquire or obtain possession of oxycodone by fraud.

1. The Controlled Substances Act (“CSA”), Title 21, United States Code, Section 801, *et seq.*, and its implementing regulations set forth which drugs and other substances are defined by law as “controlled substances.” Those controlled substances are then assigned 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. A substance listed on Schedule I has a higher abuse potential than a substance on Schedule II. The abuse potential decreases as the Schedule numbers increase. Schedule II drugs or substances have some accepted medical use, but with severe restrictions, and

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Defendant
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have a high potential for abuse, with use potentially leading to severe psychological or physical dependence. These drugs are also considered dangerous, and abuse can lead to addiction, overdose, and sometimes death.

2. Oxycodone is classified as a Schedule II controlled substance. Oxycodone is the generic name for a highly addictive prescription analgesic. The use of oxycodone in any form can lead to physical and/or psychological dependence, and abuse of the drug may result in addiction. Oxycodone is sold generically or under a variety of brand names, including OxyContin and Roxicodone.

3. In or around April 2017, the defendant, a resident of Jefferson Parish, Louisiana, was informed that an individual, Danielle Lesslie, was creating fictitious prescriptions for oxycodone by using a prescription template that had been stolen from an area physician ("Physician 1"). The defendant knew of other individuals who had fraudulently obtained oxycodone by filling fraudulent prescriptions created by Lesslie. The defendant also knew that, in exchange for the fraudulent prescriptions received from Lesslie, those individuals would deliver to Lesslie a portion of the oxycodone pills dispensed as a result of the fraudulent prescriptions.

4. The defendant learned that he could obtain oxycodone pills by providing his personal identifying information (name, date of birth, telephone number) ("PII") to Lesslie, who would use that information to create a fictitious prescription in the defendant's name using the stolen template from Physician 1. The defendant was not a patient of Physician 1 and had never been examined by Physician 1.

5. On or before April 17, 2017, the defendant provided his PII to Lesslie so that Lesslie could create a fictitious prescription for oxycodone for the defendant using the stolen template

from Physician 1. On or about April 17, 2017, Lesslie delivered to the defendant the fictitious prescription for oxycodone that she created for the defendant. The defendant subsequently filled that prescription at a pharmacy located in the Eastern District of Louisiana, ultimately receiving 90 tablets of 30mg oxycodone. The defendant paid for this prescription by using his Medicaid benefits.

6. On or before May 25, 2017, the defendant again provided his PII to Lesslie so that Lesslie could create a fictitious prescription for oxycodone for the defendant using the stolen template from Physician 1. On or about May 25, 2017, Lesslie delivered to the defendant the fictitious prescription for oxycodone that she created for the defendant. The defendant subsequently filled that prescription at a pharmacy located in the Eastern District of Louisiana, ultimately receiving 90 tablets of 30 mg oxycodone.

7. In total, between April 2017 and May 2017, the defendant acquired and obtained possession of approximately 5,400 milligrams of oxycodone by fraud.

8. In sum, the Government's evidence would prove the defendant, **JARROD ANDREW DOUBLEDAY**, conspired and agreed with Lesslie and others to acquire and obtain possession of oxycodone by fraud.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **DOUBLEDAY**, and/or the government, and it is not a complete statement of all facts described by **DOUBLEDAY** to the Government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the pleas of guilty to the

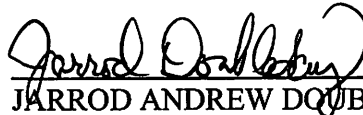
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charged offense by **DOUBLEDAY**.

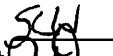
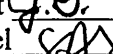
The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, *inter alia*, Special Agents and forensic examiners from the Federal Bureau of Investigation and the United States Department of Health and Human Services – Office of the Inspector General, Drug Enforcement Administration, and admissible tangible exhibits in the custody of the FBI and HHS.

READ AND APPROVED:


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Defendant


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