UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

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VINEAS HARRIS

Case:2:18-cr-20455 Judge: Hood, Denise Page MJ: Whalen, R. Steven Filed: 06-26-2018 At 04:41 PM SEALED MATTER (dat)

> VIO: 21 U.S.C. § 846 21 U.S.C. § 841(a)(1) 21 U.S.C. § 853

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

General Allegations

At all times relevant to this Indictment:

The Defendant

- VINEAS HARRIS, a resident of Oakland County, Michigan, purchased prescriptions for controlled substances, including but not limited to, Oxycodone, Oxymorphone, and Alprazolam, or "Xanax," from his co-conspirator, a licensed physician.
- Those prescriptions for controlled substances were in the name of both VINEAS HARRIS and other individuals.

3. Those prescriptions for controlled substances were filled at pharmacies and VINEAS

HARRIS then sold pills from those prescriptions in exchange for money.

<u>COUNT ONE</u> 21 U.S.C. § 846 and 841(a)(1) Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances

4. From in or around November 2015 until in or around May 2017 in the Eastern District of Michigan, and elsewhere, the defendant, VINEAS HARRIS and others, knowingly, intentionally, and unlawfully combined, conspired, confederated, and agreed with each other, and others known and unknown to the Grand Jury, to knowingly, intentionally, and unlawfully possess with intent to distribute and to distribute Schedule II controlled substances, including, but not limited to, oxycodone and oxymorphone, and Schedule IV controlled substances, including, but not limited to, alprazolam, or "Xanax."

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

FORFEITURE ALLEGATIONS (21 U.S.C. § 853)

5. The above allegations contained in this Indictment are hereby incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

- 6. As a result of the foregoing violations of Title 21, United States Code, Sections 841(a)(1) and 846, as charged in Count 1 of this Indictment, the defendant, VINEAS HARRIS shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.
- 7. Upon conviction, the United States will request that a forfeiture money judgment be imposed against defendant in an amount that represents the total amount of proceeds that defendant obtained as a result of the aforementioned offenses, and/or in the amount involved in defendant's violations of Title 21, United States Code, Sections 841(a)(1) and 846, as charged in Count 1 of this Indictment.
- 8. Pursuant to Title 21, United States Code, Section 853(p), the defendant, VINEAS HARRIS, shall forfeit substitute property, up to the value of the property described above or identified in any subsequent forfeiture bills of particular, if, by any act or omission of defendant, the property cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property that cannot be subdivided without difficulty.

THIS IS A TRUE BILL.

Grand Jury Foreperson

MATTHEW SCHNEIDER UNITED STATES ATTORNEY

<u>s/Wayne F. Pratt</u> WAYNE F. PRATT Chief, Health Care Fraud Unit Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226

s/Brendan Stewart BRENDAN STEWART Assistant Chief Criminal Division, Fraud Section United States Department of Justice 1400 New York Avenue, N.W. Washington, DC 20005

s/Steven Scott STEVEN SCOTT Trial Attorney U.S. Department of Justice Criminal Division, Fraud Section 1400 New York Avenue, N.W. Washington, DC 20005

Date: June 26, 2018