

ALSD Local 91 (Rev. 5/18) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Alabama

United States of America
v.
JOHN WALTER COLLINS

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Case No. 18-mj-76

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 11/18/ 2015 to 6/13/2017 in the county of Mobile in the Southern District of Alabama, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: Title 21, United States Code, Section 846; Conspired to possess with the intent to distribute Schedule II Controlled Substances

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Handwritten signature of William Givens

Complainant's signature

William Givens, TFO DEA

Printed name and title

Sworn to before me and attestation acknowledged pursuant to Fed. R. Crim. P. 4.1.

Date: June 19, 2018

Judge's signature

City and state: Mobile, Alabama

Honorable P. Bradley Murray, Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**UNDER SEAL**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, William Givens, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I, William A. Givens, being first duly sworn, depose and say as follows:
2. I am a Deputy with the Mobile County Sheriff's Office as a Narcotics Detective; my current assignment is with the Drug Enforcement Agency (DEA) as a Task Force Officer (TFO). I have been employed, with the Sheriff's Office for the past fourteen years, twelve of the fourteen years as a detective either with the Major Crimes Unit, Property Crimes or a Narcotics Detective. Prior to the Sheriff's Office, I was employed at the City of Mobile Police Department for seven years. I worked over four years as a Homicide Detective, one year as a Burglary Detective and two years as a Patrol Officer. I have personally been responsible for numerous Search Warrants and have assisted in over seventy five in the past twenty years working as a Law Enforcement Officer. I have testified in both federal and state court on numerous occasions concerning the manufacture, sale and distribution of narcotics and dangerous drugs. I have also testified concerning the techniques employed by drug dealers to conceal their assets and the way they keep records of such assets.
3. I have received training reference the conduct of drug dealers and related investigations, to include the manufacture of certain types of illegal drugs. I have experience in debriefing defendants, confidential sources of information, witnesses, and

other persons having personal experience and knowledge of the acquisition, transportation and distribution of illegal controlled substances.

4. I have received training on the subject of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, distribution/transportation of illegal drugs. Through my training and experience, I have learned that drug dealers frequently have large sums of currency on hand, this is because of the inherent nature of illegal drug sales. Drug dealers also frequently maintain records of their drug transaction in furtherance of their illegal business. These records are often written or located on computer hard drives that the drug dealers use. I am familiar with the drug(s) listed in this order.

**PROBABLE CAUSE**

5. From on or about November 18, 2015, to June 13, 2017, in the Southern District of Alabama, Southern Division, and elsewhere John Walter Collins (Collins) did knowingly and intentionally conspire with others, both known and unknown, to possess with the intent to distribute Schedule II Controlled Substances, to-wit: Oxycodone and Fentanyl, in violation of Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846.
6. Starting on or about November 28, 2015, through June 13, 2017, Collins presented prescriptions<sup>1</sup> for Oxycodone and Fentanyl, Schedule II Controlled Substances, purportedly ordered by a medical doctor, whose name and DEA registration number is known to the United States, to a pharmacy located within the Southern District of Alabama. At times, when filling the prescriptions, Collins would wear nurse's scrubs.

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<sup>1</sup> For a list containing the dates on which Collins filled the prescription at the pharmacy, the types of medications, and the dosage and amounts of medications dispensed, please see Exhibit A.

During at least one pharmacy visit, Collins presented himself to the pharmacy staff as a nurse<sup>2</sup> who worked at a hospice facility.

7. The medical doctor, identified by name and DEA registration number on the prescriptions presented by Collins to the pharmacy, did not authorize or issue the prescriptions for Oxycodone and Fentanyl. The individuals identified on the prescriptions as the recipients of the medication were not patients of the medical doctor. Thus, Collins presented and filled fraudulent prescriptions at the pharmacy.
8. Collins received monetary compensation for filling the prescriptions in addition to receiving reimbursement for the cost of the prescriptions.
9. The above information is true and correct to the best of my knowledge.

Respectfully submitted,



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William Givens, Task Force Officer  
Drug Enforcement Administration  
Mobile Alabama Resident Office

THE ABOVE AGENT HAD ATTESTED  
TO THIS AFFIDAVIT PURSUANT TO  
FED.R.CRIM.P.4.1(b)(2)(B) THIS 18th  
DAY OF JUNE, 2018.

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Honorable P. Bradley Murray  
United States Magistrate Judge  
Southern District of Alabama

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<sup>2</sup> On September 17, 2015, the State of Alabama revoked Collins' nursing license.

## EXHIBIT A

DATE FILLED	DRUG	DOSAGE	QUANTITY
11/24/2015	OXYCODONE	30 MG	60
11/24/2015	FENTANYL	75 MCG	5
11/24/2015	OXYCODONE	30 MG	60
12/1/2015	OXYCODONE	20 MG	90
12/1/2015	FENTANYL	75 MCG	5
12/1/2015	OXYCODONE	30 MG	60
12/18/2015	OXYCODONE	20 MG	60
12/22/2015	FENTANYL	75 MCG	5
12/29/2015	OXYCODONE	30 MG	90
1/2/2016	OXYCODONE	30 MG	90
1/2/2016	FENTANYL	75 MCG	10
1/2/2016	OXYCODONE	30 MG	60
1/15/2016	OXYCODONE	20 MG	90
1/15/2016	OXYCODONE	30 MG	60
1/19/2016	FENTANYL	75 MCG	10
1/29/2016	OXYCODONE	30 MG	90
1/29/2016	FENTANYL	75 MCG	10
1/29/2016	OXYCODONE	20 MG	60
2/6/2016	OXYCODONE	20 MG	90
2/10/2016	FENTANYL	75 MCG	10
2/10/2016	OXYCODONE	30 MG	90
2/15/2016	OXYCODONE	30 MG	60
2/15/2016	FENTANYL	75 MCG	10
2/15/2016	OXYCODONE	30 MG	60
2/25/2016	FENTANYL	75 MCG	10
2/25/2016	OXYCODONE	30 MG	90
2/25/2016	OXYCODONE	30 MG	90
3/5/2016	OXYCODONE	30 MG	90
3/5/2016	FENTANYL	75 MCG	10
3/5/2016	OXYCODONE	30 MG	60
3/12/2016	OXYCODONE	30 MG	90
3/17/2016	OXYCODONE	30 MG	90
3/25/2016	OXYCODONE	30 MG	90
3/25/2016	OXYCODONE	30 MG	90

4/1/2016	FENTANYL	75 MCG	10
4/1/2016	OXYCODONE	30 MG	90
4/8/2016	OXYCODONE	30 MG	90
4/8/2016	OXYCODONE	30 MG	60
4/11/2016	OXYCODONE	30 MG	90
4/11/2016	FENTANYL	75 MCG	10
4/14/2016	OXYCODONE	30 MG	90
4/22/2016	OXYCODONE	30 MG	90
4/22/2016	FENTANYL	75 MCG	10
4/22/2016	OXYCODONE	30 MG	60
5/3/2016	OXYCODONE	30 MG	90
5/3/2016	FENTANYL	50 MCG	10
5/3/2016	OXYCODONE	30 MG	60
5/11/2016	FENTANYL	50 MCG	10
5/19/2016	OXYCODONE	20 MG	90
5/19/2016	OXYCODONE	20 MG	60
5/23/2016	FENTANYL	75 MCG	10
5/23/2016	OXYCODONE	30 MG	90
5/23/2016	OXYCODONE	30 MG	90
5/31/2016	FENTANYL	50 MCG	5
5/31/2016	OXYCODONE	20 MG	90
6/3/2016	FENTANYL	50 MCG	10
6/3/2016	OXYCODONE	20 MG	60