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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Jun 21, 2023**

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEOFFREY WAYNE REYNOLDS,

Defendant.

Case No: 2:23-cr-00076-MKD

INFORMATION

18 U.S.C. § 1035

False Statements Relating to Health  
Care Matters

The United States Attorney charges:

General Allegations

1. Since 1994, Defendant has been a licensed pharmacist in Washington State (License No. PHRM.PH.00017863). Between 2019 and October 2021, Defendant worked as a pharmacist at Walgreens Store Number 13971, located in East Wenatchee, Washington, in the Eastern District of Washington.

2. In August 2021, Washington Governor Jay Inslee announced that, effective October 18, 2021, state employees, including firefighters, had to be fully vaccinated against COVID-19 or have an approved exemption as a condition of their employment.

1           3.       On or about September 13, 2021, while working as a pharmacist at  
2 Walgreens Store Number 13971, Defendant knowingly, willfully, and intentionally  
3 falsified vaccine documentation for Douglas County Fire District firefighter, W.E., at  
4 W.E.'s request. W.E. did not want the vaccine, but believed that he needed vaccine  
5 documentation in order to keep his job. At W.E.'s request, Defendant knowingly,  
6 willfully, and with the intent to defraud, "wasted" *i.e.*, did not administer and  
7 destroyed, the dose, and then completed a false and fraudulent COVID-19 vaccine  
8 card, Walgreens vaccine administration records, and billing documentation, falsely  
9 reflecting that Defendant had administered an initial dose of the Pfizer COVID-19  
10 vaccine to W.E. On or about October 5, 2021, Defendant did the same for W.E.'s  
11 purported second dose of the Pfizer vaccine.

12           4.       On or about September 20, 2021, while working as a pharmacist at  
13 Walgreens Store Number 13971, Defendant knowingly, willfully, and intentionally  
14 falsified COVID-19 vaccine documentation for Douglas County Fire District  
15 firefighter J.B., at J.B.'s request. J.B. had obtained an initial dose of the COVID-19  
16 vaccine, and, because he believed he had a bad reaction to the initial dose, did not  
17 want a second dose, but believed that he needed documentation of the second dose in  
18 order to keep his job. At J.B.'s request, Defendant knowingly, willfully, and with the  
19 intent to defraud, "wasted" *i.e.*, did not administer and destroyed, the dose, and then  
20 completed a false and fraudulent COVID-19 vaccine card, Walgreens vaccine  
21 administration records, and billing documentation, falsely reflecting that Defendant  
22 had administered a second dose of the Pfizer COVID-19 vaccine to J.B.

23           5.       Defendant's fraudulent conduct with respect to J.B. and W.E. involved a  
24 "health care benefit program" in that both J.B. and W.E. had health insurance  
25 coverage through Washington's Public Employees Benefit Board program, which  
26 provides health insurance coverage for Washington state employees, which Walgreens  
27 billed and received payment based on the fraudulent documentation completed by  
28 Defendant.


COUNT 1

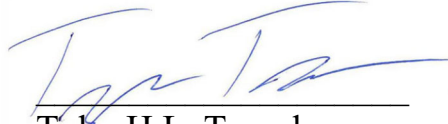
6. Paragraphs 1 through 5 are realleged and incorporated as though set forth herein.

7. On or about September 13, 2021, in the Eastern District of Washington, defendant GEOFFREY WAYNE REYNOLDS, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, in connection with the delivery of and payment for health care benefits, items, and services involving Washington State Public Employee Benefits Boards health insurance coverage, a health care benefit program as defined in 18 U.S.C. § 24(b), in violation of Title 18, United States Code, Section 1035.

Dated this 21st day of June, 2023.

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