

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

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CLERK U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. **8:17-cr-84-T-24TBW**

YOLANDA CAMARA
JUSTIN OLIVEIRA and
JONATHAN WAINWRIGHT

21 U.S.C. § 846
18 U.S.C. § 1001(a)(2)
21 U.S.C. § 841(b)(1)(C)

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy)

At times material to this Indictment:

A. Introduction

1. Family Medical Express Center, Inc. ("Family Medical") was a medical clinic located in Brandon, Florida.
2. YOLANDA CAMARA managed and co-owned Family Medical.
3. JUSTIN OLIVEIRA was YOLANDA CAMARA's son and an employee of Family Medical. Among other things, JUSTIN OLIVEIRA assisted at Family Medical by preparing medical paperwork and conducting patient intake.

4. JONATHAN WAINWRIGHT resided in St. Petersburg, Florida and “sponsored” patients to obtain medically unnecessary prescriptions for controlled substances from Family Medical for later distribution on a per-pill basis.

B. The Charge

5. Beginning on an unknown date, but no later than on or about February 24, 2012, and continuing through at least on or about August 8, 2012, in the Middle District of Florida and elsewhere, the defendants,

YOLANDA CAMARA,
JUSTIN OLIVEIRA, and
JONATHAN WAINWRIGHT,

did knowingly and willfully combine, conspire, confederate, and agree with other persons, both known and unknown to the Grand Jury, to knowingly and intentionally distribute and dispense, and possess with the intent to distribute and dispense, Oxycodone, a Schedule II controlled substance, and Alprazolam, a Schedule IV controlled substance, not for a legitimate medical purpose and not in the usual course of professional practice, in violation of 21 U.S.C. § 841(a)(1) and 21 C.F.R. § 1306.04.

All in violation of 21 U.S.C. §§ 846, 841(b)(1)(C), and 841(b)(2).

COUNT TWO

1. The Grand Jury hereby re-alleges Paragraphs 1 through 4 of Count One of this Indictment and incorporates by reference those paragraphs as though fully set forth herein.

2. On or about March 7, 2012, in the Middle District of Florida, the defendants,

YOLANDA CAMARA and
JUSTIN OLIVEIRA,

did knowingly and intentionally distribute and dispense, and possess with the intent to distribute and dispense, Oxycodone, a Schedule II controlled substance, and Alprazolam, a Schedule IV controlled substance, not for a legitimate medical purpose and not in the usual course of professional practice.

All in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 841(b)(2), and 18 U.S.C. § 2 (aiding and abetting), and *Pinkerton v. United States*, 328 U.S. 640 (1946) (co-conspirator liability).

COUNT THREE

1. The Grand Jury hereby re-alleges Paragraphs 1 through 4 of Count One of this Indictment and incorporates by reference those paragraphs as though fully set forth herein.

2. On or about March 29, 2012, in the Middle District of Florida,
the defendants,

YOLANDA CAMARA and
JUSTIN OLIVEIRA,

did knowingly and intentionally distribute and dispense, and possess with the
intent to distribute and dispense, Oxycodone, a Schedule II controlled
substance, and Alprazolam, a Schedule IV controlled substance, not for a
legitimate medical purpose and not in the usual course of professional
practice.

All in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 841(b)(2),
and 18 U.S.C. § 2 (aiding and abetting), and *Pinkerton v. United States*, 328 U.S.
640 (1946) (co-conspirator liability).

COUNT FOUR

1. The Grand Jury hereby re-alleges Paragraphs 1 through 4 of
Count One of this Indictment and incorporates by reference those paragraphs
as though fully set forth herein.

2. On or about March 30, 2012, in the Middle District of Florida,
the defendants,

YOLANDA CAMARA and
JUSTIN OLIVEIRA,

did knowingly and intentionally distribute and dispense, and possess with the

intent to distribute and dispense, Oxycodone, a Schedule II controlled substance, and Alprazolam, a Schedule IV controlled substance, not for a legitimate medical purpose and not in the usual course of professional practice.

All in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 841(b)(2), and 18 U.S.C. § 2 (aiding and abetting), and *Pinkerton v. United States*, 328 U.S. 640 (1946) (co-conspirator liability).

COUNT FIVE

1. The Grand Jury hereby re-alleges Paragraphs 1 through 4 of Count One of this Indictment and incorporates by reference those paragraphs as though fully set forth herein.

2. On or about April 11, 2012, in the Middle District of Florida, the defendants,

YOLANDA CAMARA and
JUSTIN OLIVEIRA,

did knowingly and intentionally distribute and dispense, and possess with the intent to distribute and dispense, Oxycodone, a Schedule II controlled substance, and Alprazolam, a Schedule IV controlled substance, not for a legitimate medical purpose and not in the usual course of professional practice.

All in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 841(b)(2),


and 18 U.S.C. § 2 (aiding and abetting), and *Pinkerton v. United States*, 328 U.S. 640 (1946) (co-conspirator liability).

COUNT SIX

1. The Grand Jury hereby re-alleges Paragraphs 1 through 4 of Count One of this Indictment and incorporates by reference those paragraphs as though fully set forth herein.

2. On or about April 14, 2012, in the Middle District of Florida, the defendants,

YOLANDA CAMARA,
JUSTIN OLIVEIRA, and
JONATHAN WAINWRIGHT,

did knowingly and intentionally distribute and dispense, and possess with the intent to distribute and dispense, Oxycodone, a Schedule II controlled substance, ~~and Alprazolam, a Schedule IV controlled substance~~ ^{DG} , not for a legitimate medical purpose and not in the usual course of professional practice.

All in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 841(b)(2), and 18 U.S.C. § 2 (aiding and abetting), and *Pinkerton v. United States*, 328 U.S. 640 (1946) (co-conspirator liability).

COUNT SEVEN

1. The Grand Jury hereby re-alleges Paragraphs 1 through 4 of Count One of this Indictment and incorporates by reference those paragraphs as though fully set forth herein.

2. On or about December 3, 2014, in the Middle District of Florida, the defendant,

YOLANDA CAMARA,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by falsely stating to deputized agents of the Drug Enforcement Administration that she did not know anything about Dr. Anil Sahijwani having a medical clinic in Virginia until on or about April 1, 2013, which was false because, among other things, almost a year earlier, on April 11, 2012, YOLANDA CAMARA spoke with Jonathan Wainwright about Dr. Anil Sahijwani's purported medical clinic in Virginia, and on April 11, 2012, YOLANDA CAMARA sold Jonathan Wainwright prescriptions written on a prescription pad bearing the address of Dr. Anil Sahijwani's Virginia medical clinic.

In violation of 18 U.S.C. § 1001(a)(2).

FORFEITURE

1. The allegations contained in Counts One through Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to 21 U.S.C. § 853.

2. From their engagement in the violations alleged in Counts One through Six of this Indictment, which are punishable by imprisonment for more than one year, the defendants,

YOLANDA CAMARA,
JUSTIN OLIVEIRA, and
JONATHAN WAINWRIGHT,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any:

- a. property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violation; and
- b. property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. The property to be forfeited includes, but is not limited to:

- a. a forfeiture money judgment of at least \$709,651.75; and
- b. real property located at 807 Hunters Ct., Brandon, Florida 33511.

4. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p).

A TRUE BILL,

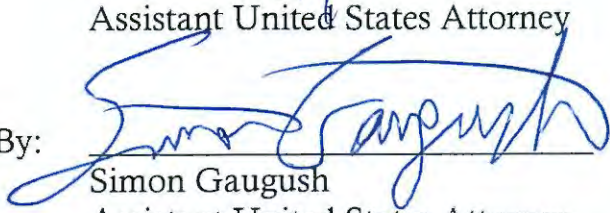

Foreperson

A. LEE BENTLEY, III
United States Attorney

By:


Daniel George
Assistant United States Attorney

By:


Simon Gaugush
Assistant United States Attorney
Chief, Economic Crimes Section

No.

UNITED STATES DISTRICT COURT

Middle District of Florida

Tampa Division

THE UNITED STATES OF AMERICA

vs.

YOLANDA CAMARA
JUSTIN OLIVEIRA and
JONATHAN WAINWRIGHT

INDICTMENT

Violations: 21 U.S.C. § 846, 18 U.S.C. § 1001(a)(2) and 21 U.S.C. § 841(b)(1)(C)

A true bill,


Foreperson

Filed in open court this _____ day

of March, 2017.

Clerk

Bail \$ _____
