

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Criminal Number

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 KRISTEN PARKER, )  
 )  
 Defendant. )

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**INDICTMENT**

**Title 18, United States Code, Section 1365(a)**  
**(Tampering with a Consumer Product)**  
**21 U.S.C. §§ 843(a)(3) and (d)(1)**  
**(Obtaining a Controlled Substance by Deceit or Subterfuge)**  
**Title 21, United States Code, Section 846**  
**(Attempt to Commit an Offense)**

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THE GRAND JURY CHARGES:

**COUNTS 1-21**

**Title 18, United States Code, Section 1365(a)**  
**(Tampering with a Consumer Product)**

On or about the dates specified in each Count below, within the District of  
Colorado, the defendant

**KRISTEN PARKER**

with reckless disregard for the risk that another person will be placed in danger of bodily  
injury, and under circumstances manifesting extreme indifference to such risk, tampered

and attempted to tamper with the consumer products (specified in each Count below), that affected interstate commerce, and the containers for such product by removing the contents of the syringe containing Fentanyl Citrate and replacing it with other substances, as follows:

<b>COUNT</b>	<b>"ON OR ABOUT" DATE</b>	<b>CONSUMER PRODUCT</b>	<b>LOCATION OF MANUFACTURE</b>
1	10/22/08	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
2	12/4/08	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
3	12/18/08	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
4	1/7/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
5	1/22/09 in the afternoon	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
6	1/22/09 in the morning	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
7	1/23/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
8	1/26/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
9	2/2/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
10	2/3/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
11	2/4/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
12	2/11/09 in the afternoon	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
13	2/11/09 in the morning	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
14	2/16/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS

15	2/17/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
16	2/20/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
17	3/4/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
18	3/10/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
19	3/20/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
20	3/23/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS
21	4/13/09	FENTANYL CITRATE	Rocky Mount, NC or McPherson, KS

All in violation of Title 18, United States Code, Section 1365(a).

**COUNTS 22 -42**

**21 U.S.C. §§ 843(a)(3) and (d)(1)  
 (Obtaining a Controlled Substance by Deceit or Subterfuge)  
 21 U.S.C. §846  
 (Attempt to Commit an Offense)**

On or about the dates specified in each Count below, within the District of Colorado, the defendant,

**KRISTEN PARKER**

did knowingly and intentionally acquire and obtain, and attempt to acquire and obtain, a Controlled Substance, to wit: Fentanyl Citrate, by deception and subterfuge, as reflected in each Count below:

<b>COUNT</b>	<b>“On or About” Date</b>	<b>LOCATION</b>
22	10/22/08	Rose Medical Center, Denver, Colorado

23	12/04/08	Rose Medical Center, Denver, Colorado
24	12/18/08	Rose Medical Center, Denver, Colorado
25	01/07/09	Rose Medical Center, Denver, Colorado
26	01/22/09 in the afternoon	Rose Medical Center, Denver, Colorado
27	01/22/09 in the morning	Rose Medical Center, Denver, Colorado
28	01/23/09	Rose Medical Center, Denver, Colorado
29	01/26/09	Rose Medical Center, Denver, Colorado
30	02/02/09	Rose Medical Center, Denver, Colorado
31	02/03/09	Rose Medical Center, Denver, Colorado
32	02/04/09	Rose Medical Center, Denver, Colorado
33	02/11/09 in the afternoon	Rose Medical Center, Denver, Colorado
34	02/11/09 in the morning	Rose Medical Center, Denver, Colorado
35	02/16/09	Rose Medical Center, Denver, Colorado
36	02/17/09	Rose Medical Center, Denver, Colorado
37	02/20/09	Rose Medical Center, Denver, Colorado
38	03/04/09	Rose Medical Center, Denver, Colorado
39	03/10/09	Rose Medical Center, Denver, Colorado
40	03/20/09	Rose Medical Center, Denver, Colorado
41	03/23/09	Rose Medical Center, Denver, Colorado
42	04/13/09	Rose Medical Center, Denver, Colorado

All in violation of Title 21 United States Code, Sections 843(a)(3) and (d)(1), and Title 21,  
United States Code, Section 846.

A TRUE BILL

Ink signature on file in the Clerk's Office  
FOREPERSON

DAVID M. GAOUILLE  
Acting United States Attorney

by: s/ Jaime A. Pena  
By: JAIME A. PENA  
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Attorney for the Government

DATE: July 23, 2009

DEFENDANT: KRISTEN PARKER

YOB: 1982

ADDRESS: Elizabeth, CO.

COMPLAINT FILED?  YES  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 09-MJ-01108-KLM  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?  YES  NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: COUNTS 1-21 : Title 18, United States Code, Sections 1365(a), Tampering with a Consumer Product.

COUNTS 22-42 : Title 21, United States Code, Sections 843(a)(3) and (d)(1), and 846, Obtaining a Controlled Substance by Deceit and Subterfuge, and Attempting to do Same.

LOCATION OF OFFENSE (COUNTY/STATE): Denver County, Colorado

PENALTY: COUNTS 1-21: Title 18, United States Code, Section 1365(a), Tampering with a Consumer Product and Aiding and Abetting the same: NMT 10 years imprisonment, NMT \$250,000 fine, or both, NMT 3 years supervised release, \$100 Special assessment fee; if serious bodily injury occurred, NMT 20 years imprisonment, NMT \$250,000 fine, or both, NMT 3 years supervised release, \$100 Special assessment fee; if death of an individual results, NMT life imprisonment, NMT \$250,000 fine, or both, NMT 3 years supervised release, \$100 Special assessment fee.

COUNTS 22-42: Title 21, United States Code, Sections 843(a)(3) and (d)(1), and 846, Obtaining a Controlled Substance by Deceit and Subterfuge, and Attempting Same: NMT 4 years imprisonment, NMT \$250,000 fine, or both; NMT 3 years supervised release; \$100 Special assessment fee.

AGENT: Mary LaFrance, Special Agent  
U.S. Food and Drug Administration

Office of Criminal Investigations

AUTHORIZED BY: Jaime Peña  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less  over five days  other

THE GOVERNMENT

will seek detention in this case  will **not** seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE:  Yes  No