

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (WATERLOO) DIVISION

UNITED STATES OF AMERICA,)	No. 18-CR-2031
)	
Plaintiff,)	INDICTMENT
)	
vs.)	Count 1
)	21 U.S.C. § 843(a)(3): Acquiring a
LACEY STAVELEY,)	Controlled Substance by
)	Misrepresentation, Fraud,
Defendant.)	Deception, or Subterfuge
)	
)	Counts 2 - 4
)	18 U.S.C. § 1035(a)(2): False
)	Statements Relating to Health Care
)	Matters

The Grand Jury charges:

Count 1

**Acquiring a Controlled Substance by
Misrepresentation, Fraud, Deception, and Subterfuge**

On or about November 13, 2016, in the Northern District of Iowa, defendant LACEY STAVELEY did knowingly and intentionally acquire and obtain possession of hydrocodone, a Schedule II controlled substance, by misrepresentation, fraud, deception, and subterfuge. Specifically, defendant LACEY STAVELEY used the identities of two nursing home patients, D.Y. and C.M., who each had a prescription for a medication containing hydrocodone, that is, hydrocodone-acetaminophen oral tablets, in order to falsely indicate in each of those patients' medical records that the medications were administered to those patients, when in fact defendant LACEY STAVELEY diverted those medications to her own unlawful possession.

This was in violation of Title 21, United States Code, Section 843(a)(3).

Counts 2 - 4

False Statements Relating to Health Care Matters

As enumerated in each count below, in the Northern District of Iowa, defendant LACEY STAVELEY, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, in connection with the delivery of health care benefits, items, and services involving Medicare, a health care benefit program as defined in 18 U.S.C. § 24(b), in that, on or about each of the following dates and at the corresponding times, defendant LACEY STAVELEY indicated in the electronic medical records of the Cedar Falls Health Care Center that she had performed and verified the administration of medications to patients, when in fact defendant LACEY STAVELEY did not administer those medications, namely oral tablets containing a hydrocodone, a Schedule II controlled substance, as follows:

Count	Date	Purported Administration Time	Medication	Patient	Health Care Benefit Program
2	November 13, 2016	4:00 p.m.	Hydrocodone-Acetaminophen tablet 5-325 MG	D.Y.	Medicare
3	November 13, 2016	8:00 p.m.	Hydrocodone-Acetaminophen tablet 5-325 MG	D.Y.	Medicare
4	November 13, 2016	Evening	Hydrocodone-Acetaminophen tablet 5-325 MG	C.M.	Medicaid

This was in violation of Title 18, United States Code, Section 1035(a)(2).

A TRUE BILL

s/ Foreperson 6/7/18
Grand Jury Foreperson Date

PETER E. DEEGAN, JR.
United States Attorney

By: *Timothy L. Vavricek*

TIMOTHY L. VAVRICEK
Assistant United States Attorney

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY
And filed 6/7/2018
ROBERT L. PHELPS, CLERK