

**FILED**

DEC 19 2023

*gmm*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

1:23-cr-00649

Judge Steven C. Seeger

Magistrate Judge Maria Valdez

Cat. 4 / Random

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Dec 19, 2023

UNITED STATES OF AMERICA	)	
	)	No.
v.	)	
	)	Violation: Title 18, United States
NICKOLE BUTLER	)	Code, Section 1365(a)(4)

The SPECIAL NOVEMBER 2022 GRAND JURY charges:

1. At times material to this Indictment:

a. Defendant NICKOLE BUTLER was a registered professional nurse licensed in the State of Illinois.

b. Defendant BUTLER was employed as a Registered Nurse at a skilled nursing facility in the Northern District of Illinois.

c. Patient A was a patient residing at the skilled nursing facility.

2. On or about May 16, 2021, in the Northern District of Illinois, Western Division, and elsewhere,

NICKOLE BUTLER,

defendant herein, with reckless disregard for the risk that another person would be placed in danger of bodily injury and under circumstances manifesting extreme indifference to such risk, tampered with a consumer product that affected interstate commerce, specifically, removed liquid morphine prescribed to Patient A, and replaced it with morphine diluted with another liquid, knowing that the diluted morphine was to be dispensed to Patient A;

In violation of Title 18, United States Code, Section 1365(a)(4).

A TRUE BILL:

---

FOREPERSON

---

ACTING UNITED STATES ATTORNEY