

AO (Rev. 5/85) Criminal Complaint

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 6:12-mj- 1179,-01-02-03

TERRIE JAIME
ERIC RIDDLE
HAROLD RIDDLE

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about December 14, 2009 through January 26, 2012, in Orange County, Florida, in the Middle District of Florida, defendants did,

knowingly and willfully conspire to possess with intent to distribute Oxycodone, a Schedule II drug and Hydrocodone, a Schedule III drug,

in violation of Title 21, United States Code, Section 846. I further state that I am a Task Force Agent with Drug Enforcement Administration, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No


TFA DAVE KING
Signature of Complainant
David King
Task Force Agent
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

April 13, 2012 _____

at

Orlando, Florida _____

The Honorable Gregory J. Kelly
United States Magistrate Judge
Name & Title of Judicial Officer _____


Signature of Judicial Officer _____

STATE OF FLORIDA

CASE NO. 6:12-mj- 1179

COUNTY OF ORANGE

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, David King, being duly sworn, depose and say:

1. I am a Task Force Agent (TFA) with the United States Drug Enforcement Administration (DEA) assigned to the Orlando District Office. I have been a Task Force agent since July 2011. I have been employed by the Volusia County Sheriff's Office since May 2006. I have completed the Florida state basic law enforcement academy and numerous other law enforcement/narcotics training courses. During my employment with the Volusia County Sheriff's Office I have received specialized training and have gained experience in the investigation of criminal drug trafficking, including prescription pill trafficking. I have been trained in the methods that drug traffickers use to distribute controlled substances, and I am familiar with the means by which drug traffickers manage, transport, and conceal the proceeds of their drug trafficking activities. I have participated in seizures of controlled substances, seizures of drug proceeds, and the arrests of drug traffickers. I have debriefed cooperating individuals and have conducted other means of investigations.

2. This affidavit is based upon knowledge that I have acquired during this investigation of drug trafficking activities committed by a drug trafficking organization in the Apopka, Florida area. This affidavit is based upon my personal knowledge, training, and experience as a law enforcement officer, information that I received from other law enforcement officers and agents, and information received from other investigative means to include controlled phone calls and confidential sources. The statements

contained in this affidavit are based in part on information and official reports of Special Agents of the DEA and other members of other federal, state, and local law enforcement agencies. From my personal participation in this investigation and also from records, documents and other evidence obtained as a result of this investigation, I am familiar with the circumstances and offenses described in this affidavit and the information has been reviewed and determined to be reliable. Since this affidavit is being submitted for the limited purpose of issuing a criminal complaint against Terrie Jaime, Eric Riddle and Harold Riddle, I have not included each and every fact known concerning this investigation.

3. On October 25, 2011, TFA David King was contacted via telephone by an Apopka, Florida, pharmacist. The pharmacist stated that he had been filling prescriptions for a group of individuals for an extended period of time and had become suspicious that the prescriptions were fraudulently obtained. The pharmacist advised that the following individuals have been filling suspicious prescriptions: Terrie Jaime, Tina Riddle, Harold Riddle, Eric Riddle, Jason Dewey, Heather Keaton, Lisa McLeod and Mary Riddle. All of the prescriptions are written by an Apopka physician ("the Apopka physician"), but whenever he called to confirm the prescription the office manager, Terrie Jaime, would make the confirmation. The pharmacist stated that he knows that Terrie Jaime is a long time employee of the Apopka physician. The pharmacist said he contacted the Apopka physician to determine if the prescriptions were fraudulent and the Apopka physician indicated that none of above-mentioned individuals, including Jaime, were his patients and the prescriptions were fraudulent.

4. TFA King contacted the loss prevention manager for a pharmacy which dispensed pills for the Apopka physician and obtained their prescriber profile for the Apopka physician. TFA King also obtained a prescriber profile for the Apopka physician through the State of Florida Prescription Drug Monitoring Program (PIMP). These profiles showed all of the prescriptions written under the Apopka physician's name. After examining these records TFA King determined that the following individuals were filling suspicious prescriptions in the Apopka physician's name: Terrie Jaime, Carlos Jaime, Lisa Macleod, Eric Riddle, Harold Riddle, Tina Riddle, Mary Riddle, Jason Dewey, Heather Keaton, Britney Perez-Prado, Daniel Collins, Donald Jackson, Robert Maynard, Stephanie Klinker, Cherry Ayala, Valerie Heckle, Daryl Ayers, Tracy Gibson, Gabriel Palau, Erin Borak, Jody Anderson, Little Joseph Howell, Rafael Laureano, Gregory Rodriguez, and Rebecca Lorenzo.

5. Through examination of the Apopka physician's prescriber profiles and the DEA Prescription Drug Monitoring Program profile, it was determined that the individuals identified in paragraph four were responsible for obtaining approximately 50,000 controlled substances from December 14, 2009 through January 26, 2012. Upon retrieving prescriptions from the pharmacies identified in the profiles, TFA King located prescriptions for the following amounts:

Terrie Jaime - 4,630 Oxycodone 30 milligram tablets, 3,770 Oxycodone 15 milligram tablets, and 840 Methadone 10 milligram tablets.

Eric Riddle - 4,200 Oxycodone 30 milligram tablets, 2,080 Oxycodone 15 milligram tablets, 840 Methadone 10 milligram tablets, and 1,320 Hydrocodone 10/500 milligram tablets.

Harold Riddle - 3,240 Oxycodone 30 milligram tablets, 1,200 Oxycodone 15 milligram tablets, and 240 Hydrocodone 10/500 milligram tablets.

The total number of controlled substances obtained by these three individuals is 22,360.

6. On November 1, 2011, TFA King spoke with the Apopka physician at his residence and asked him if he had knowledge of Terrie Jaime's illegal activities. The Apopka physician admitted that he recently became aware that Jaime was stealing prescriptions from his office. He said that he contacted several local pharmacies and confirmed his suspicions about Jaime. The Apopka physician stated that Jaime has been employed by him for approximately ten years and has a five year-old daughter. The Apopka physician said that he wanted to help her rather than get her in trouble so he told her that she had to enroll in an Employee Assistance Program (EAP) for her addiction to pain medication. The Apopka physician stated that prior to finding out about the fraudulent prescriptions, Jaime would always write prescriptions for patients at his direction. The Apopka physician would review the prescriptions and sign them. The Apopka physician believed that Terrie Jaime had the opportunity to steal prescriptions during this time.

7. On November 23, 2011, TFA King again contacted the Apopka physician at his doctor's office. TFA King provided the Apopka physician a list of the above individuals identified in paragraph four for him to review. The Apopka physician told TFA King that none of the individuals on the list were authorized to fill prescriptions or were his patients except for one. The Apopka physician stated that Rebecca Lorenzo was a patient, but she had not been treated since 2010. The Apopka physician said that Lorenzo was a nurse at the Woodland Terrace Nursing Home at 120 West Chipola

Avenue, Deland, Florida 32720. The Apopka physician stated that he travels to see several patients at that location, and Terri Jaime would typically travel with him.

Interview with Terrie Jaime

8. On February 29, 2012, at approximately 12:30 p.m. TFA David King and TFA Samuel Stephenson contacted Terrie Jaime at the Apopka physician's office. TFA King told Jaime that he wished to speak to her in reference to the filling of fraudulent prescriptions and further, no matter what information she provided to them, she would not be arrested that day. Jaime was also advised that she was free to leave at any time. Jaime said she understood and agreed to discuss the incident with TFA King.

9. Jaime said that several years before, her nephew, Eric Riddle, became addicted to prescription pills. Riddle asked her to get him prescriptions for hydrocodone, which she did. Jaime said that she would regularly visit patients with the Apopka physician and due to his writing being illegible, Jaime wrote many of his prescriptions. Jaime admitted that she began stealing the prescriptions for Riddle. Jaime said that after she also became addicted to pain medication, she began filling prescriptions in her own name. Eventually her and Riddle's addictions became worse and they both began using Oxycodone. Jaime admitted that she wrote numerous prescriptions for Eric Riddle, Tina Riddle, and Heather Keaton, as well as a few in Harold Riddle's name. Jaime said that she believes Eric Riddle and Harold Riddle were filling all of the prescriptions in Tina Riddle's name without her knowledge. Jaime admitted that she was also filling prescriptions in her husband, Carlos Jaime's, name without his knowledge. Jaime stated she would meet with Eric Riddle in the parking lot of pharmacies and fill out prescriptions in names of individuals which he would provide

her. In exchange for providing the prescriptions, Eric Riddle would give Jaime some of the pills. Jaime denied ever giving Eric Riddle any blank prescriptions.

10. Jaime stated that she would travel with the Apopka physician to the Woodland Terrace Nursing Home in Deland, Florida to assist him with patients. While working at the nursing home, she came to know the nurses. Jaime admitted that on several occasions she gave Rebecca Lorenzo prescriptions for hydrocodone without the Apopka physician's permission.

Interview with Eric Riddle

11. On March 9, 2012, at approximately 1:30 p.m. TFA King and TFA Stephenson contacted Eric Riddle at the Orange County Jail where he was incarcerated. At that time, TFA King advised Riddle of his Miranda warnings and asked if he understood his rights. Riddle said that he understood his rights and agreed to speak with TFA King.

12. Riddle stated that he started using prescription pills when he was 15 years old, with some of these pills being provided by Jaime. Riddle claimed when he turned 18 years old, Jaime asked him to start filling stolen prescriptions from the doctor's office where she worked. Riddle claimed that Jaime has been stealing and filling fraudulent prescriptions for the past six or seven years. Riddle admitted that he and Jaime primarily used hydrocodone but began using oxycodone about two years ago. Riddle said that he would meet Jaime at either the doctor's office or the pharmacy to obtain the prescriptions. Riddle explained that when they first started filling prescriptions, he, George Maynard, and Jaime would divide the costs of the pills and the pills. Riddle said that approximately two years ago Maynard was excluded after he became greedy and

took more than his share of pills. Riddle stated that after Maynard was excluded, he began splitting the prescriptions with Jaime.

13. Riddle said he would bring multiple people with him to obtain prescriptions from Jaime. Riddle advised he gave prescriptions to Jason Dewey, Heather Keaton, Britney Perez-Prado, Donald Jackson, Daniel Collins, Stephanie Klinker, Lisa Mcleod, and Erin Borak. Riddle said that these individuals would take the prescriptions to the pharmacies themselves.

Interview with Harold Riddle

14. On February 29, 2012, TFA King and TFA Stephenson contacted Harold Riddle at his residence, 1243 Peach St. Apopka, Florida. TFA King advised Riddle that no matter what information he provided on that date, he would not be arrested that day. Riddle was free to leave at any time. Riddle agreed to speak with TFA King. Riddle said that after his brother, Eric Riddle, was arrested he helped clean out his bedroom and found numerous pill bottles with different people's names on them. Riddle said that he confronted Terrie Jaime about the prescriptions and she asked him to fill some as well. Riddle stated that he initially refused to fill any prescriptions at that time. Riddle stated he later needed money and decided to fill the prescriptions to make money. Riddle stated he would fill the prescriptions and receive half of the pills from Jaime as payment. Riddle claimed that he never took any of the pills and sold them all. Riddle said at one point he moved to Kentucky and his brother, Eric Riddle, continued to fill prescriptions in his name. To ensure that they obtained the pills, Harold Riddle would be in contact with Terrie Jaime to make sure she was at the doctor's office to receive phone calls from the pharmacists to confirm the prescriptions.


15. Based upon the above detailed information, probable cause exists to believe that Terrie Jaime, Harold Riddle, and Eric Riddle knowingly and willfully conspired to distribute, and to possess with intent to distribute, Oxycodone, a schedule II controlled substance, and Hydrocodone, schedule III controlled substances, in violation of 21 U.S.C. § 846(a)(1) and 841(b)(1)(C) and (b)(1)(D).

Further your affiant sayeth not.


TKA DAVE KING

David King
Task Force Agent
Drug Enforcement Administration

Subscribed and sworn before me
this 13th day of April, 2012.



The Honorable Gregory J. Kelly
United States Magistrate Judge