

FILED
At Albuquerque NM

NOV 10 2010 *meo*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DOLORES CENTENO, a/k/a Dolores Chavez,

Defendant.

CRIMINAL NO. *10-3087 BB*

Counts 1-41: 21 U.S.C. § 843 (a)(3):
Acquiring or Obtaining a Controlled
Substance by Misrepresentation,
Fraud, Forgery, Deception or
Subterfuge;

Counts 42-45: 21 U.S.C. § 846:
Attempt.

INDICTMENT

The Grand Jury charges:

Count 1

On or about February 8, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 2

On or about February 10, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 3

On or about February 11, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 4

On or about February 17, 2010, in Sandoval County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 5

On or about February 18, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 6

On or about February 20, 2010, in Sandoval County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance,

by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 7

On or about February 23, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 8

On or about February 25, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 9

On or about February 28, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 10

On or about March 7, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 11

On or about March 21, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 12

On or about March 22, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 13

On or about March 31, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance,

by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 14

On or about April 2, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 15

On or about April 3, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 16

On or about April 6, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 17

On or about April 13, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 18

On or about April 15, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 19

On or about April 18, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 20

On or about April 19, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance,

by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 21

On or about May 10, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 22

On or about May 12, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 23

On or about May 13, 2010, in Sandoval County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 24

On or about May 16, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 25

On or about May 24, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 26

On or about May 25, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 27

On or about May 27, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance,

by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 28

On or about May 29, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 29

On or about May 30, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 30

On or about June 1, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained Vicodin, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 31

On or about June 9, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 32

On or about June 10, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 33

On or about June 12, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 34

On or about June 15, 2010, in Sandoval County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance,

by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 35

On or about June 17, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 36

On or about June 20, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 37

On or about June 21, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 38

On or about June 24, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 39

On or about June 26, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 40

On or about July 1, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 41

On or about July 4, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, knowingly and intentionally acquired and obtained hydrocodone, a Schedule III controlled substance, by

misrepresentation, fraud, forgery, deception and subterfuge, to wit, by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843 (a)(3).

Count 42

On or about September 9, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, did knowingly, and intentionally attempt to acquire and obtain possession of hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, contrary to 21 U.S.C. § 843(a)(3).

In violation of 21 U.S.C. § 846.

Count 43

On or about September 9, 2010, in Bernalillo County, in the District of New Mexico, at a time distinct from that charged in Count 42, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, did unlawfully, knowingly, and intentionally attempt to acquire and obtain possession of hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, contrary to 21 U.S.C. § 843(a)(3).

In violation of 21 U.S.C. § 846.

Count 44

On or about September 26, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, did unlawfully, knowingly, and intentionally attempt to acquire and obtain possession of hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, contrary to 21 U.S.C. § 843(a)(3).

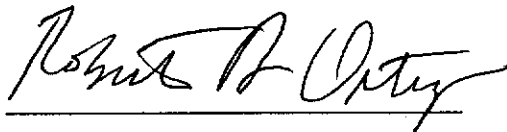
In violation of 21 U.S.C. § 846.

Count 45

On or about October 22, 2010, in Sandoval County, in the District of New Mexico, the defendant, **DOLORES CENTENO, a/k/a Dolores Chavez**, did unlawfully, knowingly, and intentionally attempt to acquire and obtain possession of hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, contrary to 21 U.S.C. § 843(a)(3).

In violation of 21 U.S.C. § 846.

A TRUE BILL:



Assistant United States Attorney

_____/s/_____

FOREPERSON OF THE GRAND JURY

____ 11/04/10 10:15am