

SEALED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
at CHATTANOOGA

FILED

2012 AUG 28 P 5:03

UNITED STATES OF AMERICA)
)
)
 v.)
)
)
 FAITH BLAKE,)
 a/k/a Faith Marvell Brueland,)
 a/k/a Faith Fuentes,)
 a/k/a Faith Baker,)
 BARBARA LANG,)
 a/k/a Barbara Langford,)
 a/k/a Aunt Bea,)
 CHARLES REED LARMORE,)
 a/k/a Chuck Larmore,)
 and)
 JEROME ARNOLD SHERARD)

U.S. DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
 1:12-cr-104
 Judge Collier
 Judge Carter

INDICTMENT

COUNT ONE

**(Conspiracy to Distribute and Dispense Controlled Substances
Superior One Medical Clinic)**

The Grand Jury charges that beginning in or about December 2010 and continuing through in or about July 2011, in the Eastern District of Tennessee, the defendants, FAITH BLAKE, BARBARA LANG, CHARLES REED LARMORE, JEROME ARNOLD SHERARD, and others, did combine, conspire, confederate and agree with each other to knowingly, intentionally, and without authority distribute and dispense, and cause to be distributed and dispensed, outside the scope of professional practice and not for a legitimate medical purpose, quantities of:

Schedule II controlled substances - Hydromorphone (Dilaudid), Oxycodone (Endocet, Lortab, Oxycontin, Percocet, and Roxicodone), Oxymorphone (Opana), Methadone, and Morphine (MS-Contin);

Schedule III controlled substances - Hydrocodone (Vicoden); and

Schedule IV controlled substances - Alprazolam (Xanax), Carisoprodol (Soma), Clonazepam (Klonopin), Diazepam (Valium), and Zolpidem Tartrate (Ambien)

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(C) and (E).

COUNT TWO

**(Maintaining a Drug-Involved Premises
Superior One Medical Clinic
4421 Highway 58, Chattanooga, Tennessee)**

The Grand Jury further charges that from in or about December 2010 through in or about January 2011, in the Eastern District of Tennessee, the defendants, FAITH BLAKE and BARBARA LANG, did knowingly and intentionally open, use, and maintain a business, to wit Superior One Medical Clinic, at 4421 Highway 58, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT THREE

**(Maintaining a Drug-Involved Premises
Superior One Medical Clinic
4750 Highway 58, Chattanooga, Tennessee)**

The Grand Jury further charges that from in or about January 2011 through April 2011, in the Eastern District of Tennessee, the defendants, FAITH BLAKE and BARBARA LANG, did

knowingly and intentionally open, use, and maintain a business, to wit Superior One Medical Clinic, at 4750 Highway 58, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT FOUR
(Maintaining a Drug-Involved Premises
Superior One Medical Clinic
340 North Holtzclaw Avenue, Chattanooga, Tennessee)

The Grand Jury further charges that from in or about April 2011 through May 2011, in the Eastern District of Tennessee, the defendants, FAITH BLAKE, BARBARA LANG and JEROME ARNOLD SHERARD, did knowingly and intentionally open, use, and maintain a business, to wit Superior One Medical Clinic, at 340 Holtzclaw Avenue, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT FIVE
(Maintaining a Drug-Involved Premises
Superior One Medical Clinic
4850 Highway 58, Chattanooga, Tennessee)

The Grand Jury further charges that from in or about May 2011 through July 2011, in the Eastern District of Tennessee, the defendants, FAITH BLAKE and BARBARA LANG, did knowingly and intentionally open, use, and maintain a business, to wit Superior One Medical Clinic, at 4850 Highway 58, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT SIX
**(Conspiracy to Distribute and Dispense Controlled Substances
Elite Care Pain Clinic)**

The Grand Jury further charges that beginning in or about August 2011 and continuing through in or about November 2011, in the Eastern District of Tennessee, the defendants, FAITH BLAKE, JEROME ARNOLD SHERARD, and others, did combine, conspire, confederate and agree with each other to knowingly, intentionally, and without authority distribute and dispense, and cause to be distributed and dispensed, outside the scope of professional practice and not for a legitimate medical purpose, quantities of:

Schedule II controlled substances - Hydromorphone (Dilaudid), Oxycodone (Endocet, Lortab, Oxycontin, Percocet, and Roxicodone), Oxymorphone (Opana), Methadone, and Morphine (MS-Contin);

Schedule III controlled substances - Hydrocodone (Vicoden); and

Schedule IV controlled substances - Alprazolam (Xanax), Carisoprodol (Soma), Clonazepam (Klonopin), Diazepam (Valium), and Zolpidem Tartrate (Ambien)

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(C) and (E).

COUNT SEVEN
**(Maintaining a Drug-Involved Premises
Elite Care Pain Clinic
5622 Highway 153, Chattanooga, Tennessee)**

The Grand Jury further charges that from in or about August 2011 through in or about November 2011, in the Eastern District of Tennessee, the defendant, FAITH BLAKE, did knowingly and intentionally open, use, and maintain a business, to wit Elite Care Pain Clinic, at

5622 Highway 153, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT EIGHT
**(Conspiracy to Dispense and Distribute Controlled Substances
Primary Care and Pain Clinic)**

The Grand Jury further charges that beginning in or about August 2011 and continuing through in or about June 2012, in the Eastern District of Tennessee, the defendants, BARBARA LANG, CHARLES REED LARMORE, and others, did combine, conspire, confederate and agree with each other to knowingly, intentionally, and without authority distribute and dispense, and cause to be distributed and dispensed, outside the scope of professional practice and not for a legitimate medical purpose, quantities of:

Schedule II controlled substances - Hydromorphone (Dilaudid), Oxycodone (Endocet, Lortab, Oxycontin, Percocet, and Roxicodone), Oxymorphone (Opana), Methadone, and Morphine (MS-Contin);

Schedule III controlled substances - Hydrocodone (Vicoden); and

Schedule IV controlled substances - Alprazolam (Xanax), Carisoprodol (Soma), Clonazepam (Klonopin), Diazepam (Valium), Temazepam (Restoril), and Zolpidem (Ambien).

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(C) and (E).

COUNT NINE
**(Maintaining a Drug-Involved Premises
Primary Care and Pain Clinic
5323 Brainerd Road, Chattanooga, Tennessee)**

The Grand Jury further charges that in or about August 2011 through September 2011, in the Eastern District of Tennessee, the defendant, BARBARA LANG, did knowingly and intentionally open, use, and maintain a business, to wit Primary Care and Pain Clinic, at 5323 Brainerd Road, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT TEN
**(Maintaining a Drug-Involved Premises
Primary Care and Pain Clinic
Airpark Drive, Suite A, Chattanooga,
Tennessee)**

The Grand Jury further charges that from in or about October 2011 through June 2012, in the Eastern District of Tennessee, the defendants, BARBARA LANG and CHARLES REED LARMORE, did knowingly and intentionally open, use, and maintain a business, to wit Primary Care and Pain Clinic, at Airpark Drive, Suite A, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT ELEVEN
**(Conspiracy to Dispense and Distribute Controlled Substances
Sherard Clinics)**

The Grand Jury further charges that beginning in at least September 2009 and continuing through in or about June 2012, in the Eastern District of Tennessee, the defendant, JEROME

ARNOLD SHERARD, and others, did combine, conspire, confederate and agree with each other to knowingly, intentionally, and without authority distribute and dispense, and cause to be distributed and dispensed, outside the scope of professional practice and not for a legitimate medical purpose, quantities of:

Schedule II controlled substances - Hydromorphone (Dilaudid), Oxycodone (Endocet, Lortab, Oxycontin, Percocet, and Roxicodone), Oxymorphone (Opana), Methadone, and Morphine (MS-Contin);

Schedule III controlled substances - Hydrocodone (Vicoden); and

Schedule IV controlled substances - Alprazolam (Xanax), Carisoprodol (Soma), Clonazepam (Klonopin), Diazepam (Valium), Temazepam (Restoril), and Zolpidem (Ambien).

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(C) and (E).

COUNT TWELVE

(Maintaining a Drug-Involved Premises

Sherard Clinic,

a/k/a Sherard Pediatric Clinic,

a/k/a Sherard Family Clinic,

a/k/a Sherard Medical Center,

a/k/a Sherard General Practice and Pain Management Clinic,

a/k/a General Practice and Pediatrics,

and a/k/a Skyview Medical Center of Chattanooga

- 340 North Holtzclaw Avenue, Chattanooga, Tennessee)

The Grand Jury further charges that from at least September 2009 through June 2012, in the Eastern District of Tennessee, the defendant, JEROME ARNOLD SHERARD, did knowingly and intentionally open, use, and maintain a business, to wit Sherard Clinic, a/k/a Sherard Pediatric Clinic, a/k/a Sherard Family Clinic, a/k/a Sherard Medical Center, a/k/a

Sherard General Practice and Pain Management Clinic, a/k/a General Practice and Pediatrics, and a/k/a Skyview Medical Center of Chattanooga, at 340 North Holtzclaw Avenue, Chattanooga, Tennessee for the purpose of illegally distributing Schedule II, III, and IV controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNTS THIRTEEN through FORTY-EIGHT
(Unlawfully Distributing and Dispensing Controlled Substances)

The Grand Jury further charges that on or about the dates listed below, in the Eastern District of Tennessee, the defendant, CHARLES REED LARMORE, did knowingly and intentionally dispense, and cause to be dispensed, quantities of the controlled substances listed below to the patients, with the initials indicated below, outside the scope of professional practice and not for a legitimate medical purpose; each such instance constituting a violation of Title 21, United States Code, Sections 841(a)(1) and (b):

<u>COUNT</u>	<u>DATE</u>	<u>PATIENT'S INITIALS</u>	<u>CONTROLLED SUBSTANCE</u>	<u>SCHEDULE</u>
13	5/02/11	R.G.	Endocet (Oxycodone)	II
14	5/02/11	R.G.	Alprazolam	IV
15	6/08/11	T.W.	Oxycodone	II
16	6/08/11	T.W.	MS Contin (Morphine)	II
17	6/08/11	T.W.	Alprazolam	IV
18	3/23/11	K.W.	Oxycodone	II
19	3/23/11	K.W.	Alprazolam	IV
20	3/23/11	K.W.	Opana (Oxymorphone)	II
21	1/27/11	C.Wr.	Percocet (Oxycodone)	II
22	1/27/11	C.Wr.	Oxycodone	II
23	5/04/11	M.R.	Oxycodone	II
24	12/16/10	F.B.	Hydrocodone	III
25	1/05/11	F.B.	Hydrocodone	III
26	1/24/11	F.B.	Oxycodone	II
27	2/11/11	F.B.	Oxycodone	II
28	3/02/11	F.B.	Oxycodone	II
29	3/02/11	F.B.	Hydromorphone	II

<u>COUNT</u>	<u>DATE</u>	<u>PATIENT'S INITIALS</u>	<u>CONTROLLED SUBSTANCE</u>	<u>SCHEDULE</u>
30	3/15/11	F.B.	Oxycodone	II
31	4/08/11	F.B.	Oxycodone	II
32	4/28/11	F.B.	Oxycodone	II
33	4/28/11	F.B.	Hydromorphone	II
34	5/19/11	F.B.	Oxycodone	II
35	5/19/11	F.B.	Hydromorphone	II
36	6/09/11	F.B.	Oxycodone	II
37	6/15/11	F.B.	Opana (Oxymorphone)	II
38	2/17/12	S.N.	Oxycodone	II
39	2/17/12	S.N.	Oxycodone	II
40	1/10/12	C.Wr	Oxycodone	II
41	1/10/12	C.Wr.	Oxycodone	II
42	<i>Miss</i> - 3/08/12	T.R.	Oxycodone	II
43	3/08/12	T.R.	Oxycodone	II
44	3/09/12	C.Wa.	Oxycodone	II
45	3/09/12	C.Wa.	Oxycodone	II
46	6/18/12	E.E.	Diazepam	IV
47	6/18/12	E.E.	Oxycodone	II
48	6/18/12	E.E.	Oxycodone	II

COUNTS FORTY-NINE through SIXTY-THREE
(Unlawfully Distributing and Dispensing Controlled Substances)

The Grand Jury further charges that on or about the dates listed below, in the Eastern District of Tennessee, the defendant, JEROME ARNOLD SHERARD, did knowingly and intentionally dispense, and cause to be dispensed, quantities of the controlled substances listed below to the patients, with the initials indicated below, outside the scope of professional practice and not for a legitimate medical purpose; each such instance constituting a violation of Title 21, United States Code, Sections 841(a)(1) and (b):

<u>COUNT</u>	<u>DATE</u>	<u>PATIENT'S INITIALS</u>	<u>CONTROLLED SUBSTANCE</u>	<u>SCHEDULE</u>
49	6/30/11	J.G.	MS Contin (Morphine)	II
50	6/30/11	J.G.	Xanax (Alprazolam)	IV
51	6/30/11	J.G.	Oxycodone	II

<u>COUNT</u>	<u>DATE</u>	<u>PATIENT'S INITIALS</u>	<u>CONTROLLED SUBSTANCE</u>	<u>SCHEDULE</u>
52	6/15/11	C.Wr.	Percocet	II
53	6/15/11	C.Wr.	Oxycodone	II
54	6/15/11	C.Wr.	Zolpidem	IV
55	5/18/11	M.R.	Oxycodone	II
56	10/26/11	R.G.	Oxycodone	II
57	10/26/11	R.G.	Oxycodone	II
58	10/26/11	R.G.	Xanax (Alprazolam)	IV
59	10/04/11	J.G.	Oxycodone	II
60	10/04/11	J.G.	Oxycodone	II
61	10/04/11	J.G.	Percocet (Oxycodone)	II
62	10/04/11	J.G.	Morphine	II
63	10/04/11	J.G.	Xanax (Alprazolam)	IV

COUNTS SIXTY-FOUR through SIXTY-SIX
(Attempted Distribution of a Controlled Substance)

The Grand Jury further charges that on or about May 17, 2011, in the Eastern District of Tennessee, the defendant, JEROME ARNOLD SHERARD, did knowingly and intentionally attempt to distribute the controlled substances listed below to a patient with the initials A.G., outside the scope of professional practice and not for a legitimate medical purpose; each such instance constituting a violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b):

<u>COUNT</u>	<u>CONTROLLED SUBSTANCE</u>	<u>SCHEDULE</u>
64	Percocet (Oxycodone)	II
65	Oxycodone	II
66	Alprazolam	IV

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One through Sixty-Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Sections 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846 and/or 841 and Title 21, United States Code, Section 856, the defendants, FAITH BLAKE, BARBARA LANG, CHARLES REED LARMORE, JEROME ARNOLD SHERARD, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

Currency

- a. \$234,333.00 cash seized from defendant BARBARA LANG at her residence on or about June 19, 2012.
- b. \$2,700.00 cash seized from defendant CHARLES LARMORE at his residence on June 19, 2012.

Bank Accounts

- a. Contents of Bank of America account, account number #xxxx6400, in the name of PRIMARY CARE AND PAIN CLINIC, INC., property of BARBARA LANG and CHARLES LARMORE, in the amount of \$267,595.22.
- b. Contents of Bank of America account, account number #xxxx6413, in the name of PRIMARY CARE AND PAIN CLINIC, INC., property of BARBARA LANG and CHARLES LARMORE, in the amount of \$5,348.64.
- c. Contents of Bank of America account, account number #xxxx1421, in the name of BARBARA LANG, in the amount of \$5,095.30.
- d. Contents of Regions Bank account, account number #xxxx9429, in the name of CHARLES LARMORE, in the amount of \$354,199.97.

- e. Contents of Bank of America account, account number #xxxx6915, in the name of CHARLES LARMORE, in the amount of \$3,904.48.
- f. Contents of Regions Bank account, account number #xxxx1639, in the name of CHARLES LARMORE, in the amount of \$12,376.11.
- g. Contents of Cornerstone Community Bank account, account number #xxxx2447, in the name of SHERARD PEDIATRICS, property of JEROME ARNOLD SHERARD, in the amount of \$127,544.18.
- h. Contents of Cornerstone Community Bank account, account number #xxxx5230, in the name of JEROME A. SHERARD, in the amount of \$65,412.13.

Vehicles

- a. 2001 Jaguar XJ8, VIN SAJDA24C51LF25400 seized from defendant BARBARA LANG at her residence on or about June 19, 2012.
- b. 2006 Toyota Rav4, VIN JTMZK32V766002040 seized from defendant CHARLES LARMORE at his residence on or about June 19, 2012.

Money Judgment

A personal money judgment against defendants, FAITH BLAKE, BARBARA LANG, CHARLES REED LARMORE, and JEROME ARNOLD SHERARD, and in favor of the United States in the amount of \$7,200,000.00, representing proceeds and property facilitating the illegal dispensing and distributing of controlled substances outside the scope of professional practice and not for a legitimate medical purpose during the course of the conspiracies charged in Count One - Superior One (\$2,000,000); Count Six - Elite Care (\$700,000); Count Eight - Primary Care (\$2,000,000); and Count Eleven - Sherard Clinics (\$2,500,000).

3. If any of the property described above, as a result of any act or omission

of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

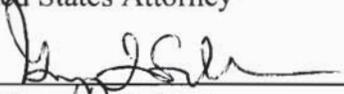
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

SIGNATURE REDACTED

GRAND JURY FOREPERSON

WILLIAM C. KILLIAN
United States Attorney

By: 
Gregg W. Sullivan
Assistant U.S. Attorney