

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIE LYNNE GRANT,

[DOB: 03/10/1970]

Defendant.

Case No. _____

COUNT ONE

(Obtaining a Controlled Substance by Fraud)

21 U.S.C. § 843(a)(3), (d)(1)

NMT 4 Years Imprisonment

NMT \$250,000 Fine,

NMT 1 Year Supervised Release

Class E Felony

\$100 Mandatory Special Assessment

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

(Obtaining a Controlled Substance by Fraud)

On or about April 4, 2019, in the Western District of Missouri, the defendant, **JULIE LYNNE GRANT**, knowingly executed a scheme and artifice to acquire and obtain possession of controlled substances, to wit, fentanyl, a Schedule II controlled substance, under the custody and control of the Hospital Corporation of America Midwest Research Medical Center (“HCA RMC”) by misrepresentation, fraud, forgery, deception and subterfuge.

1. As part of the scheme and artifice to obtain possession of fentanyl, **JULIE LYNNE GRANT** did the following:

- a. On April 4, 2019, at approximately 08:45 hours, **GRANT** called the HCA RMC pharmacy and requested a compounded fentanyl IV bag for a patient. When conferring with the pharmacist, **GRANT** falsely reported that her name was “Jessica.” **GRANT** also claimed that a patient in the Neurological Intensive Care

- Unit (“ICU”) had a “dry” fentanyl bag and needed a new one. **GRANT** made these material false statements in an effort to fraudulently obtain fentanyl for **GRANT**’s personal use and to conceal her true identity.
- b. On April 4, 2019, at approximately 09:03 hours, **GRANT** arrived at the pharmacy to obtain a 50-milliliter (“ML”) fentanyl IV bag. As part of the artifice to fraudulently obtain the fentanyl, **GRANT** signed for the fentanyl on a Pharmacy Delivery Signature Receipt page and on that form she falsely indicated that her name was “JMALONE RN.”
 - c. On April 4, 2019, between approximately 09:30 and 09:45 hours, **GRANT** tampered with the 50 ML bag of fentanyl that she fraudulently obtained. **GRANT** stole fentanyl from the bag and replaced it with an unknown clear solution.
 - d. On April 4, 2019, prior to approximately 09:45 hours, a pharmacist at HCA RMC confronted **GRANT** about the suspicious circumstances surrounding her recent acquisition of the aforementioned fentanyl. **GRANT** claimed that the fentanyl was no longer needed and she falsely reported that it was ordered by mistake. The pharmacist advised **GRANT** to return the fentanyl bag. **GRANT** then returned the tampered bag with the unknown solution in it back to the pharmacy and she again falsely signed a receipt as “JAMALONE RN,” in an effort to conceal her identity from HCA RMC and law enforcement.

All in violation of Title 21, United States Code, Section 843(a)(3) and (d)(1).

Respectfully submitted,

Timothy A. Garrison
United States Attorney

By /s/William A. Alford III

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