

STATE OF INDIANA)
) SS:
COUNTY OF DUBOIS)

IN THE DUBOIS COUNTY COURT

CAUSE NO. 19

INFORMATION FOR:

COUNT 1:

OBTAINING A CONTROLLED
SUBSTANCE BY FRAUD OR DECEIT
I.C. 35-48-4-14(c)
A LEVEL 6 FELONY

COUNT 2:

OBTAINING A CONTROLLED
SUBSTANCE BY FRAUD OR DECEIT
I.C. 35-48-4-14(c)
A LEVEL 6 FELONY

COUNT 3:

OBTAINING A CONTROLLED
SUBSTANCE BY FRAUD OR DECEIT
I.C. 35-48-4-14(c)
A LEVEL 6 FELONY

COUNT 4:

FAILURE TO MAKE, KEEP OR FURNISH
RECORDS
I.C. 35-48-4-14(a)(3)
A LEVEL 6 FELONY

STATE OF INDIANA

VS

COURTNEY R. SCHAEFER

DOB:

SSN:

Count 1: Between July 18, 2025 and September 29, 2025 in Dubois County, State of Indiana, the following named defendant, Courtney R. Schaefer did knowingly or intentionally acquire possession of a controlled substance, to-wit: Hydrocodone by misrepresentation, fraud, forgery, deception, and/or subterfuge. All of which is contrary to the form of the statute in such cases made and provided against the peace and dignity of the State of Indiana.

Count 2: Between July 18, 2025 and September 29, 2025 in Dubois County, State of Indiana, the following named defendant, Courtney R. Schaefer did knowingly or intentionally acquire possession of a controlled substance, to-wit: Clonazepam by misrepresentation, fraud, forgery, deception, and/or subterfuge. All of which is contrary to the form of the statute in such cases made and provided against the peace and dignity of the State of Indiana.

Count 3: Between July 18, 2025 and September 29, 2025 in Dubois County, State of Indiana, the following named defendant, Courtney R. Schaefer did knowingly or intentionally acquire possession of a controlled substance, to-wit: Pregabalin by misrepresentation, fraud, forgery, deception, and/or subterfuge. All of which is contrary to the form of the statute in such cases made and provided against the peace and dignity of the State of Indiana.

Count 4: Between July 18, 2025 and September 29, 2025 in Dubois County, State of Indiana, the following named defendant, Courtney R. Schaefer did recklessly, knowingly or intentionally fail to make,

keep, and/or furnish a record as required by I.C. 35-48. All of which is contrary to the form of the statute in such cases made and provided against the peace and dignity of the State of Indiana.

Dated: June 9, 2026

/s/ Kyle Sprunger
KYLE SPRUNGER
Deputy Attorney General

WITNESSES:

Sarah A. Shoup

Michael Meadows

Jamie Zink

STATE OF INDIANA)
) SS:
COUNTY OF DUBOIS)

STATE OF INDIANA)
)
)
)
COURTNEY R. SCHAEFER)
Defendant)

IN THE DUBOIS _____ COURT

AFFIDAVIT FOR PROBABLE CAUSE

I, Sarah A. Shoup, Drug Diversion Investigator for the Office of the Indiana Attorney General (“OAG”), Medicaid Fraud Control Unit, have probable cause to believe on or about the time between July 18, 2025, and September 29, 2025, Courtney R. Schaefer (“Schaefer”), in Dubois County, State of Indiana, did commit the following crimes:

I.C. 35-48-4-14 (a)(3) Failure to Make, Keep, or Furnish a Record, a Level 6 Felony

I.C. 35-48-4-14(c) Obtaining a Controlled Substance by Fraud or Deceit, a Level 6 Felony

I participated in the investigation of the criminal offenses described in this affidavit. The statements contained in this affidavit are founded, in part, on information provided to me through conversations or written statements and information from employees of The Waters of Huntingburg and records related to this investigation. However, because this affidavit is being submitted for the sole purpose of establishing probable cause, I have not included all facts that have been revealed during the course of this investigation.

1. I was assigned this case for investigation on October 15, 2025, through a complaint from The Waters of Huntingburg in Huntingburg, Dubois County, Indiana. The complaint was authored by Michael Meadows, Administrator at The Waters of Huntingburg, and alleged that narcotic medications were missing from the facility. He said that, upon review of schedules and various documents, it was determined that Courtney Schaefer, LPN, was involved in each occurrence. It was also noted that Schaefer failed to cooperate with the facilities’ internal investigation.

2. Schaefer was born [REDACTED]. She is a Licensed Practical Nurse (“LPN”), License Number 27070500A, and was licensed in the State of Indiana as such on September 17, 2013. Schaefer’s nursing license is currently active with an expiration date of October 31, 2026. Schaefer is a “licensed health professional” as defined by IC 25-23-1-27.1.

3. The Waters of Huntingburg is located at 1712 Leland Drive, Huntingburg, Dubois County, Indiana. The Waters of Huntingburg is registered with the Indiana State Board of Pharmacy to dispense controlled substances. Under both state (I.C. 35-48-3-3 (e)(1)) and federal law (21 C.F.R. 1301.22), Schaefer is exempted from registering separately with the state or federal government to handle controlled substances, due to being an authorized employee or agent of a registered party, as long as she is acting in the usual course of the agent’s or employee’s business or employment.

4. The Waters of Huntingburg and its employees or agents, acting in the usual course of their employment, are required to maintain complete and accurate records under both Indiana and Federal

laws pertaining to the dispensation of all controlled substances. Specifically, IC 35-48-3-7 mandates that records be kept in conformance with the record-keeping requirements of federal law and regulation and with any additional rules the Indiana State Board of Pharmacy issues such as 856 IAC 1-28.1-12. Title 21 United States Code (USC) 827(a)(3) and Title 21 Code of Federal Regulations (CFR) 1304.22 (21 CFR § 1304.22) require a complete and accurate record be maintained for the dispensing or administration of a controlled substance to a patient, including:

- a. Number of units or volume of drug dispensed.
- b. Name and address of the person to whom it was dispensed.
- c. Date of dispensing.
- d. Number of units or volume dispensed.
- e. Written or typewritten name or initials of the individual who dispensed or administered the substance.

In addition, Federal Regulation 21 CFR §1304.22 and 21 CFR §1317.95 mandates any controlled substance that is removed for dispensing, but not actually given to the patient, must be witnessed by another staff member and may be destroyed. If destroyed, then a drug destruction record must be made.

5. The Waters of Huntingburg utilizes medication cards that contain a certain number of pills, similar to a blister pack that many common medications are packed in. The cards are kept in a locked medication cart, only accessible by a key possessed by the nurse in charge of a floor or hall during his or her shift. These medication cards and their corresponding “Controlled Drug Administration Record” are delivered by United RX Pharmacy.

6. In order to dispense and administer medication to a patient during the course of a shift at The Waters of Huntingburg, the nurse in charge unlocks the cart, removes the medication, and then documents what happens to the medication in two ways. First, the nurse will document the removal of the medication from the cart on the “Controlled Drug Administration Record” (“CDR”), which is a document provided by United RX Pharmacy with each medication card. On the CDR, the nurse will document the date, time, and number of remaining pills in the medication card. Second, the nurse completes a Medication Administration Record (“MAR”), which is a report that serves as a legal record of the medication administered to a patient by a health care professional. This record will include the date, time, and quantity of the medication administered to the patient. The nurse should also then indicate, in their charting notes, why the patient needed the medication and, subsequently, if the medication was successful in alleviating pain.

7. To ensure accountability, at shift change, the departing nurse turns over the key to the medication cart to the incoming nurse. The departing nurse is also required by The Waters of Huntingburg’s policy to conduct a full count of all medications on the cart with the incoming nurse to ensure counts are correct. While the nurses compare the physical inventory to the CDR, they do not compare that count to the numerous patient MARs.

8. On October 21, 2025, I traveled to Huntingburg and retrieved the police report authored by Huntingburg Police Department. Officer C. Byrd arrived at the facility on October 1, 2025, at approximately 15:25 and spoke with Meadows in reference to missing medication. Byrd reported that Meadows and Tonya Meyer, Director of Nursing (DON), advised that there were approximately 90 narcotic pain pills missing from the facility’s medication cart. They advised Meadows that they believed Schaefer was responsible for the missing medication.

9. After retrieving the police report, I traveled to the facility and met with Meadows and Meyer. A subpoena was served for information related to the incident and Meadows and Meyer briefly discussed the incident with me. They told me that Schaefer was believed to have taken entire medication cards containing narcotic pills and their corresponding count sheets. Meadows said that they believe that this had occurred three times with three different residents. He said the incident was discovered when a resident ran out of medication and pharmacy was contacted to refill. The pharmacy indicated that the resident should still have medication and told them the date of the last refill. Meadows said that through a thorough investigation, he and Meyer believed that when medication arrived for a resident from the pharmacy with two blister cards containing medication and two count sheets, Schaefer would take the second card containing medication and corresponding count sheet. He said that the medication would appear to be there and wouldn't be noticed missing until sometime later when it was time to use the second card.

10. On November 19, 2025, I conducted an audio recorded interview with Meadows and Jamie Zink, Assistant Director of Nursing (ADON). During an audio recorded interview with Meadows and Zink, the following information was exchanged regarding potential diversion by former employee Courtney Schaefer, LPN. I asked Meadows and Zink to explain what led to the investigation and they told me that the incident began around September 21, 2025. Meadows said that resident [REDACTED] requested her hydrocodone and it was determined that the card in the cart was empty. Pharmacy was contacted to refill the medication, and the facility was told that it was too early for a refill and that the resident should have medication on hand. Meadows said that it was determined that [REDACTED] should have another card of medication with thirty (30) more tablets remaining. Meadows said that on September 30, he was contacted regarding another card of medication that was missing for resident [REDACTED]. He said that he was at an event for work in the evening and received a call stating that the medication was missing. Meadows said that upon reviewing pharmacy deliveries, it was determined that multiple cards were delivered for [REDACTED] and [REDACTED], but count sheets only revealed one card was signed in by Schaefer. Meadows and Zink reviewed the pharmacy delivery receipts as well as daily count sheets which were supposed to be completed by nurses and showed me those discrepancies. Meadows said that after a complete audit, they determined three medication cards, belonging to three residents, were missing. (Hydrocodone belonging to [REDACTED] and [REDACTED] and Oxycodone belonging to [REDACTED]). Meadows also said that the corresponding narcotic count sheets, delivered with the medication by pharmacy, were also missing. Meadows said in all instances, Schaefer had been involved with the delivery or unpackaging by pharmacy.

11. While reviewing the documents, I noted that many times Zink pointed to instances where Schaefer had signed the initials 'CB'. She said that when Schaefer began working at the facility, she signed everything as Courtney Schaefer. She said that sometime during her tenure, she began signing things as 'CB'. Zink said that Schaefer never provided any paperwork regarding a marriage and never told anyone that she had gotten married, she just changed her signature.

12. Meadows and Zink described multiple attempts they made to have Schaefer come to the facility for an interview. We reviewed text messages between Zink and Schaefer as well as those between Meadows and Schaefer. Invariably, Schaefer never returned to the facility to participate in the investigation as requested and made several excuses as to why she couldn't come in.

13. Due to the fact that Schaefer was suspected of removing narcotic medication cards from the facility, I conducted a review of patient medication administration records and narcotic sign out sheets to ensure that Schaefer was properly documenting the administration of narcotic medication to residents of the facility. Upon review, I noted numerous discrepancies and created the following chart to show those discrepancies in Schaefer's documentation of the administration of narcotics.

[REDACTED]		
Clonazepam 1mg		
Order: One tablet, every 12 hours, as needed for pain		
Date	Amount	Result
7/18/25 at 18:00	1 tablet	No documentation of administration or waste
7/19/25 at 08:00	1 tablet	No documentation of administration or waste
7/19/25 at 18:00	1 tablet	No documentation of administration or waste
[REDACTED]		
Hydrocodone 7.5-325mg		
Order: One tablet, every 4 hours, as needed for pain		
Date	Amount	Result
7/19/25 at 10:00	1 tablet	No documentation of administration or waste
7/19/25 at 14:00	1 tablet	No documentation of administration or waste
[REDACTED]		
Hydrocodone 5-325mg		
Order: One tablet, twice daily, as needed for pain		
Date	Amount	Result
9/15/25 at 07:00	1 tablet	No documentation of administration or waste
9/15/25 at 17:00	1 tablet	No documentation of administration or waste
9/16/25 at 09:00	1 tablet	No documentation of administration or waste
9/16/25 at 19:00	1 tablet	No documentation of administration or waste
9/20/25 at 07:00	1 tablet	No documentation of administration or waste
9/20/25 at 18:00	1 tablet	No documentation of administration or waste
9/20/25 at 18:00	1 tablet	No documentation of administration or waste
9/25/25 at 07:00	1 tablet	No documentation of administration or waste
9/25/25 at 18:00	1 tablet	No documentation of administration or waste
9/29/25 at 07:00	1 tablet	No documentation of administration or waste
9/29/25 at 18:00	1 tablet	No documentation of administration or waste
[REDACTED]		
Pregabalin 100mg		
Order: One tablet, twice daily; two tablets at bedtime		
Date	Amount	Result
9/15/25 at 18:00	2 tablets	No documentation of administration or waste
9/21/25 at 18:00	1 tablet	No documentation of administration or waste

14. I contacted Schaefer via telephone and email. On both occasions, I left my contact information and a request for Schaefer to contact me. Schaefer never returned my communication.

15. This investigation reveals that on or between July 18, 2025 and September 29, 2025, Courtney Schaefer recklessly, knowingly or intentionally failed to make, keep, or furnish a record or

information required under I.C. 35-48 as to the documentation of the dispensing or administration of controlled substances in violation of I.C. 35-48-4-14(a)(3).

16. This investigation reveals that on or between July 18, 2025 and September 29, 2025, Courtney Schaefer did knowingly or intentionally acquire possession of a controlled substance; to wit: Hydrocodone, a Schedule II Controlled Substance; and/or Pregabalin, a Schedule V Controlled Substance; and/or Clonazepam, a Schedule IV Controlled Substance, by misrepresentation, fraud, forgery, deception, subterfuge, or concealment of a material fact in violation of I.C. 35-48-4-14(c).

I swear, under the penalty for perjury as specified by I.C. 35-44.1-2-1 that the foregoing is true to the best of my information and belief.

/s/ Sarah A Shoup
Sarah A. Shoup, Diversion Investigator
Medicaid Fraud Control Unit
Indiana Attorney General