

STATE OF INDIANA)
) SS:
COUNTY OF HENDRICKS)

IN THE HENDRICKS COUNTY CIRCUIT
COURT

CAUSE NUMBER. 32

STATE OF INDIANA

VS

INFORMATION:

Count 1:

**Obtaining a Controlled Substance by Fraud or
Deceit**

a Level 6 Felony
I.C. 35-48-4-14(c)

PAULA MCCARTHY

DOB: [REDACTED]

OLN: [REDACTED]

On or about September 17, 2025, in Hendricks County, Indiana Paula McCarthy did knowingly or intentionally acquire possession of a controlled substance, to-wit: Oxycodone, misrepresentation, fraud, forgery, deception, and/or subterfuge.

/s/ Kyle

Sprunger

Kyle Sprunger, Attorney no. 37755-29
Deputy Attorney General, Office of the Indiana Attorney
General

STATE OF INDIANA)
) SS:
COUNTY OF HENDRICKS)

IN THE HENDRICKS COUNTY CIRCUIT
COURT

CAUSE NUMBER. 32

STATE OF INDIANA

VS

INFORMATION:

Count 2:

PAULA MCCARTHY

DOB: [REDACTED]
OLN: [REDACTED]

Furnishing False or Fraudulent Information
a Level 6 Felony
I.C. 35-48-4-14(b)(3)

On or about September 18, 2025, in Hendricks County, Indiana Paula McCarthy did knowingly or intentionally furnish false or fraudulent material information in and/or omit material information from a document required to be kept or filed by I.C. 35-48.

/s/ Kyle
Sprunger
Kyle Sprunger, Attorney no. 37755-29
Deputy Attorney General, Office of the Indiana Attorney
General

STATE OF INDIANA)
) SS:
COUNTY OF HENDRICKS)

IN THE HENDRICKS COUNTY CIRCUIT
COURT

CAUSE NUMBER. 32

STATE OF INDIANA

VS

INFORMATION:

Count 3:

Forgery
a Level 6 Felony
I.C. 35-43-5-2(b)(1)

PAULA MCCARTHY

DOB: [REDACTED]

OLN: [REDACTED]

On or about September 18, 2025, in Hendricks County, Indiana Paula McCarthy, with intent to defraud, did make, utter and/or possess a written instrument, to-wit: a Controlled Substance Record required to be kept or filed under IC 35-48; in such a manner that it purports to have a signature that had been made by another person, to-wit: Omolara Adeyamo, but in fact was a forged signature of Adeyamo's that was created by Paula McCarthy.

/s/ Kyle

Sprunger

Kyle Sprunger, Attorney no. 37755-29
Deputy Attorney General, Office of the Indiana Attorney
General

STATE OF INDIANA)
)
COUNTY OF HENDRICKS)

IN THE HENDRICKS SUPERIOR COURT
SS:
CAUSE NO:

STATE OF INDIANA)
)
)
)
)
VS.)
)
Paula McCarthy)
DOB: 07-17-1975)

AFFIDAVIT FOR PROBABLE CAUSE

I, Craig Whited, a Drug Diversion Investigator for the Indiana Office of Attorney General, Medicaid Fraud Control Unit, have probable cause to believe that Paula McCarthy did commit the following crimes in the County of Hendricks, State of Indiana:

I.C. 35-48-4-14(c) Obtaining a Controlled Substance by Fraud, a Level 6 Felony
I.C. 35-48-4-14(b)(3) Furnishing False or Fraudulent Information, a Level 6 Felony
I.C. 35-43-5-2(b)(1) – Forgery – a Level 6 Felony

1. I am a Drug Diversion Investigator for the Office of the Indiana Attorney General’s Medicaid Fraud Control Unit (MFCU), and I am currently assigned to the Indianapolis, Indiana office. Prior to being hired by the MFCU, I was employed as a police officer for approximately 20 years and served as a detective for approximately 13 of those 20 years. And as a Drug Diversion Investigator with the MFCU, I have been involved in numerous narcotic investigations including diversion and theft of controlled substances from health care facilities.

2. 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 Brownsburg Meadows and medical records related to this investigation. I believe these witnesses to be truthful and credible.

3. Because this affidavit is being submitted for the purpose of filing criminal charges, I have not included all facts that have been revealed during the course of this investigation. I have set forth only the facts that are believed to be necessary to establish the required foundation for probable cause.

4. On 09-19-2025 the Brownsburg Meadows nursing home reported to the State of Indiana that there was a medication discrepancy with a resident’s oxycodone involving an RN named Paula McCarthy, and this case was later assigned to this Investigator.

5. RN Paula McCarthy is a Registered Nurse (RN) with the nursing license number of 28140692A. RN McCarthy also has the date of birth of [REDACTED] and a home address of [REDACTED]

[REDACTED]

6. RN McCarthy was employed at Brownsburg Meadows from 12-09-2019 until she was terminated on 09-29-2026 for falsifying a Controlled Substance Record. As an RN at Brownsburg Meadows, her duties consisted of destroying medications that were outdated or discontinued, along with other common nursing duties.

7. Brownsburg Meadows is a long-term care facility (nursing home) that provides memory care, rehabilitation, and long-term nursing care to its residents. Brownsburg Meadows is located at 2 East Tilden Drive in Brownsburg, IN 46112, in Hendricks County.

8. Brownsburg Meadows 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.

9. Brownsburg Meadows utilizes Omnicare of Indianapolis to provide pharmacy services to their facility; and Brownsburg Meadows receives regular deliveries of medication, including controlled substance medications, in the form of daily deliveries from Omnicare of Indianapolis.

10. Brownsburg Meadows utilizes locked Medication Carts ("Med Carts") to store and dispense medications to residents within their facility. A Med Cart will be assigned to a group of residents, and that Med Cart will contain medications that are prescribed to the residents that Med Cart is assigned to. These Med Carts are locked and require a key to unlock it in order to access the medications within that cart.

11. Brownsburg Meadows then utilizes nurses to administer the medications within a Med Cart to the facility residents that the medications are prescribed to. Each shift, a nurse will be assigned a specific locked Med Cart and will be the only staff member on the floor that will have the keys to unlock their assigned Med Cart to access the medications within it. For example: While on duty, RN Paula McCarthy

would be the only staff member on the floor that would have the keys to unlock her assigned Med Cart in order to access oxycodone and other medications inside of it.

12. Nurses that are assigned to a Med Cart will unlock it to access the medications, withdraw the medications for the appropriate resident per physician order, and then make the appropriate records that note the medication was removed from the Med Cart and then administered to the patient.

13. When a nurse that is assigned to a Med Cart begins their shift, they will do an inventory count of the controlled substance medication inside of the Med Cart with the outgoing nurse they are relieving. This is many times called a “shift-change count.” This count, conducted by the incoming and outgoing nurses together, helps to ensure the inventory of medications is correct. Once the controlled substance medications have been counted together, the incoming nurse takes control of the Med Cart and its keys from the outgoing nurse, and the incoming nurse now has the keys to unlock the Med Cart until that nurse ends their shift and does another medication count with the new incoming nurse that is relieving them.

14. Controlled Substance Medications that are prescribed to residents and stored inside the Med Carts are in what are commonly called “multi-dose blister cards.” Each Multi-Dose Blister Card will also have its own Controlled Substance Record assigned to it, so when the Controlled Drug Record shows that all doses have been removed and given to the patient, the Multi-Dose Blister Card should be empty of medication.

15. Brownsburg Meadows’ policy for the destruction of controlled substances follows Federal Regulation 21 CFR §1304.22 and 21 CFR §1317.95 which mandates that if a nurse removes a controlled substance medication from a Med Cart that must be destroyed, then another staff member must witness the destruction of that controlled substance medication, and a drug destruction record must be made. One nurse signs the Controlled Substance Record that the medication was destroyed, and the other nurse signs that they witnessed the destruction of that medication.

16. [REDACTED] was a resident of Brownsburg Meadows from 08-21-2025 until she was discharged on 09-18-2025; and she was prescribed Oxycodone 5mg tablet to be given 1 tablet by mouth every four hours as needed. Oxycodone is a controlled substance and a narcotic pain-reliever and is classified as a Schedule II drug.

17. On 09-17-2025 RN Paula McCarthy worked the Brownsburg Meadows’ 200 Front Rehabilitation Unit and its Med Cart for one hour, between approximately 5pm and 6pm. Besides containing medications for other residents on the unit, this Med Cart also contained [REDACTED] prescribed oxycodone. At 6pm RN McCarthy turned this Med Cart over to RN Jerrica Starkey and RN McCarthy began conducting her other nursing duties to residents elsewhere inside of Brownsburg Meadows and then later went home.

18. At approximately 6:30pm RN Starkey went to remove a dose of [REDACTED] oxycodone from the Med Cart, but RN Starkey could not locate [REDACTED] multi-dose blister card of oxycodone. Since RN McCarthy had control of the Med Cart prior, RN Starkey contacted RN McCarthy to inquire where the missing multi-dose blister card of oxycodone may be. When contacted by RN Starkey, RN McCarthy stated that she (RN McCarthy) may have mistakenly removed [REDACTED] multi-dose blister card of

oxycodone from the Med Cart for destruction. RN Starkey then notified her supervision at Brownsburg Meadows about RN McCarthy's removal of [REDACTED] multi-dose blister card of oxycodone.

19. When Director of Nursing Jocelyn Brooks and Assistant Director of Nursing Charli Cronnon called RN McCarthy the following day on 09-18-2025 and inquired about [REDACTED] missing oxycodone, RN McCarthy told them that she mistakenly removed [REDACTED] multi-dose blister card of oxycodone from the Med Cart, and then took the oxycodone with her from the 200 Front Rehabilitation Unit to the Cottage Memory Care Unit where she destroyed it. RN McCarthy also claimed that Qualified Medication Aide Omolara Adeyemo (QMA Adeyemo) witnessed her destroy the multi-dose blister card of oxycodone.

20. RN McCarthy further advised Director of Nursing Jocelyn Brooks and Assistant Director of Nursing Charli Cronnon that she also accidentally took [REDACTED] oxycodone's Controlled Substance Record home with her, and RN McCarthy later texted them a photo of this Controlled Substance Record that appeared to show that QMA Adeyemo had signed as a witness to RN McCarthy's destruction of the oxycodone. The Controlled Substance Record also showed that there would have been 21 tablets of oxycodone remaining in the multi-dose blister card at the time the multi-dose blister card was found missing from the Med Cart.

21. Director of Nursing Jocelyn Brooks and Assistant Director of Nursing Charli Cronnon then contacted QMA Adeyemo who told them that she did not witness RN McCarthy destroy any medication, and that she did not sign the Controlled Substance Record as a witness, and that the signature on the Controlled Substance Record was not her signature.

22. After Facility Administration watched facility video surveillance that showed that RN McCarthy never entered an area in the Cottage Memory Care Unit where she could have destroyed [REDACTED] multi-dose blister card of oxycodone, Brownsburg Meadows notified law enforcement and reported the incident to the State of Indiana.

23. While Brownsburg Meadows was conducting their internal investigation into RN McCarthy's removal of [REDACTED] multi-dose blister card of oxycodone and claim that QMA Adeyemo had witnessed her destroy it, RN McCarthy texted another RN named Kimberly Dallman and asked RN Dallman to give a false statement to their supervisors. RN McCarthy asked RN Dallman to falsely state that she witnessed her destroy [REDACTED] multi-dose blister card of oxycodone.

24. When this Investigator interviewed QMA Omolara Adeyemo, she stated that:

- a. She did not witness RN McCarthy destroy oxycodone or any other medications on 09-17-2025.
- b. She did not sign the Controlled Substance Record as a witness to the destruction of the oxycodone.
- c. Her signature on [REDACTED] oxycodone's Controlled Substance Record is not her signature.

d. She did not give RN McCarthy permission to sign her signature on that Controlled Substance Record, or any other form.

25. When this Investigator interviewed RN Kimberly Dallman, she stated that she did provide false emailed statements to her supervisors at Brownsburg Meadows about witnessing RN McCarthy destroy [REDACTED] multi-dose blister card of oxycodone. RN Dallman advised that she made the false statement after RN McCarthy texted her and asked her to make the false statement about witnessing her destroy the oxycodone, when she did not witness RN McCarthy destroy it. RN Dallman then stated that she later recanted her false statement to her supervisors and admitted that she had not witnessed RN McCarthy destroy the oxycodone. At the end of this interview, this Investigator took evidentiary photographs of these text messages between RN Dallman and RN McCarthy; and RN Dallman also provided this Investigator with screenshots of the text messages.

26. During this investigation two interviews were conducted with RN Paula McCarthy. The first interview took place at the Avon Police Department where I advised her that she did not have to speak with me and that she was free to leave at any time. The 2nd interview was conducted at the Sam's Club parking lot located at 5805 Rockville Road in Indianapolis. During these interviews RN McCarthy cooperated with my investigation and stated:

a. Over the course of several years, she (RN McCarthy) would steal controlled substance medications like oxycodone and hydrocodone from Brownsburg Meadows. She typically stole doses of controlled substance medications that had to be destroyed, and she would put a few doses in her pocket before asking another nurse to come and witness her destroy the remaining doses.

b. She did remove [REDACTED] multi-dose blister card of oxycodone and its Controlled Substance Record from the 200 Front Rehab Unit's Med Cart because she mistakenly believed [REDACTED] was about to be discharged from Brownsburg Meadows.

c. She 'accidentally' took [REDACTED] multi-dose blister card of oxycodone home and flushed the tablets down into the toilet in her home.

d. If she took a drug screen right now, she would test positive for marijuana because of a marijuana cookie she ate, and she would also test positive for hydrocodone because of a left-over dose that she took the day before from an old prescription she had.

e. QMA Omolara Adeyemo did not witness her destroy the multi-dose blister card of oxycodone and she "wrote" QMA Adeyemo's name on [REDACTED] oxycodone's Controlled Substance Record where QMA Adeyemo would have signed as the witness if [REDACTED] oxycodone had been destroyed.

f. She did ask RN Kimberly Dallman to falsely state that she (Dallman) witnessed her destroy [REDACTED] oxycodone, even though RN Dallman did not witness it.

g. She wants to change her life and is looking into drug classes.

27. This investigation reveals that on or about 09-17-2025 Paula McCarthy did knowingly or intentionally acquired possession of a controlled substance; to wit: oxycodone, by misrepresentation, fraud, forgery, deception, subterfuge, or concealment of a material fact in violation of I.C. 35-48-4-14(c).

28. This investigation reveals that on or about 09-18-2025 Paula McCarthy knowingly or intentionally furnished false or fraudulent material information in or omitted material information from a report or other document required to be kept or filed 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(b)(3).

29. This investigation reveals that on or about 09-18-2025 Paula McCarthy did knowingly or intentionally, with intent to defraud, made, uttered, or possessed a written instrument in such a manner that it purports to have been made by another person; to wit: signing Omolara Adeyemo's name on a Controlled Substance Record, in violation of I.C. 35-43-5-2(b)(1).

All events took place in Hendricks County, Indiana.

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/Craig Whited

Affiant, Craig Whited

Drug Diversion Investigator

OAG-MFCU