

IN THE MAGISTRATE COURT OF KANAWHA COUNTY, WEST VIRGINIA

State of West Virginia

Case No. 26md0m05390

v.

☒ Misdemeanor/ ☐ Felony

Staci L. Gibson

Defendant (Full Name)

Social Security Number

Date of Birth

Address

Driver's License / Identification Number

City, State & Zip Code

Phone Number(s)

CRIMINAL COMPLAINT

Mag. Ct. Criminal Procedure Rule 3, 4; 18 U.S.C. § 921(a)(33)

I, the undersigned complainant, upon my oath or affirmation, state the following is true and correct to the best of my knowledge and belief. On or about June 20, 2025, in Kanawha County, West Virginia, in violation of *West Virginia Code § (cite specific section, subsection, and/or subdivision, if applicable) 61-2-29(b)*, the defendant did *(state statutory language of the offense)*

Neglect an incapacitated adult by failing to administer prescribed medications, and failed to inform the residents' physician that such medications were unavailable.

I further state that this complaint is based upon the following facts: See attached

☒ Check if continued on an attached sheet?

(If this complaint involves misdemeanor assault/battery [West Virginia Code § 61-2-9] or misdemeanor domestic assault/ battery [West Virginia Code § 61-2-28], check all that apply.)

The defendant

☐ is/was the victim's spouse.

☐ is/was living with the victim as a spouse, parent, or guardian.

☐ is/was a parent or guardian of the victim.

☐ is a person who is like a spouse, parent, or guardian of the victim.

☐ has a child in common with the victim.

☒ has none of the above connections to the victim.

Complainant (who appears before Magistrate):

John L. Poindester, WVAGO Medicaid Fraud
Complainant Name (Full Name)

Address

City, State & Zip Code

Phone Number(s)

WVMECU Investigator

Office or Title, if any

6/18/26

Date

Complainant Signature

On this complaint, sworn or affirmed before me and signed in my presence on this date by the complainant, the item(s) checked below apply:

Finding

Issuance

☐ No probable cause found

☐ Summons issued

☒ Probable cause found

☐ Warrant issued

☐ Warrantless arrest

6-18-2026

Date

Lisa Good

Magistrate Signature

IN THE MAGISTRATE COURT OF KANAWHA COUNTY, WEST VIRGINIA

MAGISTRATE COURT CRIMINAL COMPLAINT
CONTINUATION SHEET

On June 20, 2025, Dunbar Center Nurse Practitioner [REDACTED] entered an order for resident [REDACTED] to receive two antibiotics to address an infection. Staci Gibson was a License Practical Nurse (LPN) at Dunbar Center, and was assigned to oversee the care for [REDACTED] on June 20, 2025, and to administer her medications. The records establish that Staci Gibson failed to administer either of the two medications on June 20, or 21, 2025. On June 22, 2025, Staci Gibson documented that they were "Awaiting arrival from pharmacy" of the medications, and that "Provider notified." Despite the second part of the note, Dr. [REDACTED], the Facility physician was not informed that both medications had not been administered until June 23, 2025. Ms. [REDACTED] was transferred to CAMC Memorial on June 23, 2025 and was found to be suffering septic shock, acute kidney injury, and respiratory failure. She was discharged to Hospice for end-of-life care on July 1, 2025, and passed away July 4, 2025.

Staci Gibson failed to inform either [REDACTED], or Dr. [REDACTED], that the prescribed medication was unavailable until at least June 22, 2025. She also did not seek authorization and information regarding alternate medications, and instead simply did nothing. While one of the medications was finally administered on June 22, the other was not first administered until June 23, 2025, at which point [REDACTED] condition had deteriorated and it was determined she needed to be sent to the hospital. These actions constitute a violation of W.Va. Code 61-2-29(b).

W.Va. Code 61-2-29(b): Abuse or neglect of incapacitated adult; definitions; penalties.

(b) A caregiver who neglects an incapacitated adult or who knowingly permits another person to neglect an incapacitated adult is guilty of a misdemeanor and, upon conviction thereof, shall be fined not less than \$100 nor more than \$500 or confined in jail for not more than one year, or both fined and confined.

6.18.2026

Date

Lisa Good
Magistrate's Signature