

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMES ALLEN MOOREHEAD

Defendant.

No. 18-CR-3021

**INDICTMENT**

Counts 1-3

21 U.S.C. § 843(a)(3): Acquiring a  
Controlled Substance by  
Misrepresentation, Fraud,  
Deception, or Subterfuge

Counts 4-10

18 U.S.C. § 1035: False Statements  
Relating to Health Care Matters

The Grand Jury charges:

**Counts 1 through 3**

**Acquiring a Controlled Substance by  
Misrepresentation, Fraud, Deception, and Subterfuge**

On the dates specified below, in the Northern District of Iowa, defendant JAMES MOOREHEAD did knowingly and intentionally acquire and obtain possession of hydrocodone, a Schedule II controlled substance, by misrepresentation, fraud, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

As enumerated in each count below, defendant JAMES MOOREHEAD used the identities of hospital patients with prescriptions for medications containing hydrocodone to dispense those medications via the Pyxis system of Franklin General Hospital, falsely indicating in medical records the medications were

administered to those patients, when in fact defendant MOOREHEAD diverted those medications to his own unlawful possession:

<b>Count</b>	<b>Date</b>	<b>Medication</b>	<b>Patient</b>
1	July 21, 2016	Hydrocodone-acetaminophen oral tablet	J.D.
2	February 23, 2017	Hydrocodone-acetaminophen oral tablet	R.P.
3	March 3, 2017	Hydrocodone-acetaminophen oral tablet	K.V.

This was in violation of Title 21, United States Code, Section 843(a)(3).

### **Counts 4 through 10**

#### **False Statements Relating to Health Care Matters**

As enumerated in each count below, in the Northern District of Iowa, defendant JAMES MOOREHEAD, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, in connection with the delivery of health care benefits, items, and services involving Medicare, a health care benefit program as defined in 18 U.S.C. § 24(b), in that, on or about each of the following dates and at the corresponding times, defendant MOOREHEAD indicated in the electronic medical records of Franklin Hospital that he had performed and verified the administration of medications to patients, when in fact defendant MOOREHEAD did not administer those medications, namely Norco oral tablets containing a hydrocodone, a Schedule II controlled substance, as follows:

Count	Date	Admin Time	Medication	Patient	Health Care Benefit Program
4	February 23, 2017	7:43 a.m.	Norco 325 mg- 5 mg oral tablet	R.P.	Medicare
5	February 23, 2017	8:43 a.m.	Norco 325 mg- 5 mg oral tablet	R.P.	Medicare
6	February 23, 2017	12:00 p.m.	Norco 325 mg- 5 mg oral tablet	R.P.	Medicare
7	February 23, 2017	1:00 p.m.	Norco 325 mg- 5 mg oral tablet	R.P.	Medicare
8	March 3, 2017	9:58 a.m.	Norco 325 mg- 5 mg oral tablet	K.V.	Medicare
9	March 3, 2017	10:58 a.m.	Norco 325 mg- 5 mg oral tablet	K.V.	Medicare
10	March 3, 2017	1:53 p.m.	Norco 325 mg- 5 mg oral tablet	K.V.	Medicare

This was in violation of Title 18, United States Code, Section 1035(a)(2).

A TRUE BILL  
s/Foreperson

Grand Jury Foreperson

Date

6.6.18

PETER E. DEEGAN, JR.  
United States Attorney

By:



LYNDIE M. FREEMAN  
Assistant United States Attorney

PRESENTED IN OPEN COURT  
BY THE  
FOREMAN OF THE GRAND JURY  
And filed 6/6/2018  
ROBERT L. PHELPS, CLERK