DJF:JJT:nl

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA) CRIM. NO. $$: 18-01-198
v.))	
MELISSA L. HUNSICKER and DAVID ALLEN HUNSICKER,) (Cores	, J.)
Defendants.))	FILED HARRISBURG, PA
INDICT	MENT	JUN 2 0 2018
COUN	<u>NT 1</u>	Per AQA
		Deputy Clerk

CONSPIRACY TO VIOLATE TITLE 21, U.S.C. SECTION 843 (Title 21, United States Code, Section 846)

THE GRAND JURY CHARGES:

From on or about February 17, 2016, to on or about August
 23, 2017, in the Middle District of Pennsylvania, the defendants,

MELISSA L. HUNSICKER

and

DAVID ALLEN HUNSICKER,

knowingly and intentionally conspired, confederated, and agreed with persons known and unknown to the Grand Jury to knowingly and

intentionally acquire and possess Oxycodone and Hydrocodone, both are Schedule II controlled substances, by means of misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

In violation of Title 21, United States Code, Section 846.

COUNTS 2 THROUGH 16

ACQUIRING OR OBTAINING A CONTROLLED SUBSTANCE BY MISREPRESENTATION, FRAUD, FORGERY, DECEPTION, SUBTERFUGE

(Title 21, United States Code, Section 843(a)(3))

THE GRAND JURY FURTHER CHARGES:

From on or about June 14, 2016, to on or about August 15,
 in the Middle District of Pennsylvania, the defendants,

MELISSA L. HUNSICKER

and

DAVID ALLEN HUNSICKER,

knowingly and intentionally acquired and obtained possession of Oxycodone, a Schedule II controlled substance, by means of misrepresentation, fraud, forgery, deception and subterfuge as set for below:

Count No.	<u>Date</u> <u>Submitted</u>	Patient Name on Prescription	<u>Drug</u>
2	06/14/2016	David Allen Hunsicker	Oxycodone
3	07/13/2016	David Allen Hunsicker	Oxycodone
4	01/30/2017	David Allen Hunsicker	Oxycodone
5	02/10/2017	David Allen Hunsicker	Oxycodone

Count No.	<u>Date</u> Submitted	Patient Name on Prescription	Drug
6	05/26/2017	David Allen Hunsicker	Oxycodone
7	06/05/2017	David Allen Hunsicker	Oxycodone
8	06/19/2017	David Allen Hunsicker	Oxycodone
9	06/19/2017	David Allen Hunsicker	Hydrocodone
10	06/28/2017	W.H.	Oxycodone
11	12/24/2016	W.H.	Oxycodone
12	02/06/2017	W.H.	Oxycodone
13	06/08/2017	W.H.	Oxycodone
14	06/28/2017	W.H.	Oxycodone
15	07/09/2017	W.H.	Oxycodone
16	08/14/2017	W.H.	Oxycodone

In violation of Title 21, United States Code, Section 843(a)(3).

COUNTS 17 THROUGH 30

FALSE AND FRAUDULENT STATEMENTS IN CONNECTION WITH PAYMENT OF HEATH CARE BENEFITS (Title 18, United States Code, Section 1035)

THE GRAND JURY FURTHER CHARGES:

3. From on or about June 14, 2016, to on or about August 14, 2017, in the Middle District of Pennsylvania, the defendants,

MELISSA L. HUNSICKER

and

DAVID ALLEN HUNSICKER,

knowingly and willfully made materially false, fictitious and fraudulent statements and representations and made and used materially false writings and documents knowing the same to contain materially false, fictitious and fraudulent statements and entries in connection with payment for health care benefits, items, and services:

Count No.	<u>Date</u> <u>Submitted</u>	Patient Name on Prescription	<u>Drug</u>	Insurance Claim Submitted to:
17	06/14/2016	David Allen Hunsicker	Oxycodone	Medicaid
18	07/13/2016	David Allen Hunsicker	Oxycodone	Medicaid

Count No.	<u>Date</u> <u>Submitted</u>	Patient Name on Prescription	Drug	Insurance Claim Submitted to:
19	01/30/2017	David Allen Hunsicker	Oxycodone	Medicaid
20	02/10/2017	David Allen Hunsicker	Oxycodone	Medicaid
21	05/26/2017	David Allen Hunsicker	Oxycodone	Medicaid
22	06/05/2017	David Allen Hunsicker	Oxycodone	Medicaid
23	06/19/2017	David Allen Hunsicker	Hydrocodone	Medicaid
24	06/28/2017	David Allen Hunsicker	Oxycodone	Medicaid
25	12/24/2016	W.H.	Oxycodone	Medicaid
26	02/06/2017	W.H.	Oxycodone	Medicaid
27	06/08/2017	W.H.	Oxycodone	Medicaid
28	06/28/2017	W.H.	Oxycodone	Medicaid
29	07/09/2017	W.H.	Oxycodone	Medicaid
30	08/14/2017	W.H.	Oxycodone	Medicaid

In violation of Title 18, United States Code, Section 1035.

A TRUE BILL



DAVID J. FREED UNITED STATES ATTORNEY

By:

JOSEPH J. TERZ

ASSISTANT U.S. ATTORNEY

DATE