

FILED

JUN 17 2016

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURA M. WILLIAMS,

Defendant.

4:16CR00251 RWS

INFORMATION

The United States Attorney charges that:

Count 1

Title 21, United States Code, Section 843(a)(3)
Obtaining Controlled Substances by Fraud and Deception

1. At all relevant times, Laura M. Williams ("Williams") was a resident of Wentzville, Missouri. Williams is not a medical doctor, dentist, or other medical professional qualified or authorized to prescribe medications.
2. At all relevant times, Dr. Douglas P. Kummer and Dr. Steven J. Akins were dentists at My Crossroads Dentist, located in Wentzville, Missouri. From in or about July 2014, Williams was an employee of My Crossroads Dentist.
3. Certain prescription drugs are defined by federal and state law as controlled substances, which are drugs that have some potential for abuse or dependence. Controlled substances are placed into one of five schedules, based on the potential for abuse and the severity of the effects if a person abuses the drug.

4. Tramadol is a drug that is used to treat moderate to severe pain. As of August 18, 2014, the U.S. Drug Enforcement Administration (DEA) classified Tramadol as a Schedule IV controlled substance. Only authorized prescribers may prescribe Tramadol and pharmacists may only dispense Tramadol pursuant to a prescription from an authorized prescriber.

5. From in or about July 2014 through at least April 2015, without legal authority, Williams used the names of Dr. Kummer and Dr. Akins, and their DEA numbers, on fraudulent prescriptions to obtain Tramadol on numerous occasions. These dentists had not treated Williams or the persons listed on the fraudulent prescriptions, did not prescribe Tramadol for them, and had no knowledge of the fraudulent prescriptions until the investigation began.

6. On the fraudulent prescriptions, Williams used the following last names with different first names: Williams with four first names; Conley with three first names; Thompson with two first names; Michaels with two first names; and Welch with two first names. Williams also used the following additional last names on some of the fraudulent prescriptions: Williamson, Beezly, Young, Griffin, and Smith.

7. Williams presented the fraudulent prescriptions to various pharmacies, including Walgreens, Walmart, CVS, Schnucks, and other pharmacies in Missouri. Notably, Williams presented the first fraudulent prescription to Walgreens on July 26, 2014--about ten days after she began working at My Crossroads Dentist.

8. From in or about July 2014, through in or about April 2015, Williams presented numerous fraudulent prescriptions for Tramadol, 50 mg. pills. The number of pills differed, from 20 pills to 80 pills. As an example, Williams used the names and DEA numbers of Dr.

Kummer and Dr. Adkins to fraudulently obtain Tramadol in the following quantities on the dates indicated below:

August 26, 2014	80 pills	Walmart
September 16, 2014	80 pills	Walmart
September 26, 2014	80 pills	Walmart
October 17, 2014	80 pills	Schnucks
October 20, 2014	60 pills	Walgreens
October 27, 2014	50 pills	Walmart
November 3, 2014	80 pills	Walmart
November 10, 2014	60 pills	Schnucks
November 18, 2014	60 pills	Walmart
November 21, 2014	40 pills	Walmart
November 24, 2014	20 pills	Walmart

9. On or about March 20, 2015, in St. Charles County, within the Eastern District of Missouri,

LAURA M. WILLIAMS,

the defendant herein, did knowingly and intentionally acquire and obtain possession of a controlled substance by misrepresentation, fraud, forgery, deception, and subterfuge, that is, she presented a fraudulent prescription, with Dr. Steven Akins falsely identified as the prescriber, to Schnucks Pharmacy and obtained 50 Tramadol pills, a Schedule IV controlled substance.

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

The United States Attorney further charges that:

Count 2
Title 18, United States Code, Section 1028(a)(1)
Identity Theft

10. Paragraphs 1 through 8 are incorporated by reference as if fully set out herein.
11. On or about February 26, 2015, in St. Charles County, within the Eastern District of Missouri,

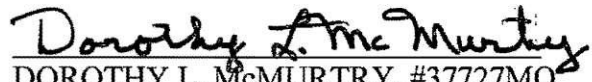
LAURA M. WILLIAMS,

the defendant herein, did knowingly and without legal authority produce an identification document, authentication feature, and false identification document, that is, she used the name of Dr. Douglas P. Kummer and his DEA registration number on a fraudulent prescription to obtain Tramadol pills, a Schedule IV controlled substance.

All in violation of Title 18, United States Code, Section 1028(a)(1).

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney


DOROTHY L. McMURTRY, #37727MO
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Dorothy L. McMurtry, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

Dorothy L. McMurtry
DOROTHY L. McMURTRY, #37727MO

Subscribed and sworn to before me this 7 day of June, 2016

Gregory Linhares
CLERK, U.S. DISTRICT COURT

By: Elizabeth L. Leland
DEPUTY CLERK