

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 19-
v.	:	DATE FILED:
TAYJHA BROWN	:	VIOLATIONS:
		21 U.S.C. § 846 (conspiracy to distribute
	:	controlled substances – 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information, unless otherwise specified:

1. Defendant TAYJHA BROWN was a former Licensed Practical Nurse in Pennsylvania and was a resident of the Eastern District of Pennsylvania.
2. N.P. was a resident of the Eastern District of Pennsylvania and a relative of TAYJHA BROWN.
3. H.S. was a resident of the Eastern District of Pennsylvania and an acquaintance of TAYJHA BROWN.
4. A pharmacy, referred to as "Pharmacy 1," was a corporation organized under the laws of the Commonwealth of Pennsylvania and a licensed pharmacy doing business in the Eastern District of Pennsylvania.

CONSPIRACY

5. From at least in or about May 2016 until in or about October 2016, in the Eastern District of Pennsylvania, defendant

TAYJHA BROWN

conspired and agreed with N.P., H.S., and others known and unknown to the United States Attorney, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

MANNER AND MEANS

6. Defendant TAYJHA BROWN stole prescription paper.

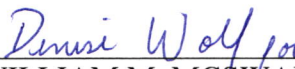
7. Defendant TAYJHA BROWN forged fraudulent prescriptions for oxycodone in her own name and in the names of N.P. and H.S., all known to the United States Attorney, in order to obtain quantities of oxycodone. In no case were any of the physicians who purportedly signed the fraudulent prescriptions aware that their signatures were being forged by defendant TAYJHA BROWN.

8. After forging each of the prescriptions created with stolen prescription pads, stolen prescription paper, or a home computer and printer, defendant TAYJHA BROWN (1) personally presented the fraudulent prescriptions in her name or in N.P.'s or H.S.'s names at Pharmacy 1, or (2) provided the fraudulent prescriptions in N.P.'s name to N.P. to present at Pharmacy 1. Defendant TAYJHA BROWN obtained oxycodone from the fraudulent prescriptions forged in all three individuals' names in various quantities.

9. Defendant TAYJHA BROWN provided approximately 30 oxycodone pills to N.P. for each fraudulent prescription filled in N.P.'s name at Pharmacy 1.

10. Defendant TAYJHA BROWN provided approximately 30 oxycodone pills to H.S. for each fraudulent prescription filled in H.S.'s name at Pharmacy 1.

All in violation of Title 21, United States Code, Section 846.



WILLIAM M. MCSWAIN
United States Attorney
Eastern District of Pennsylvania

ROBERT ZINK
Acting Chief
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