


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

APR 03 2019

UNITED STATES OF AMERICA)
)
 v.)
)
 LAWRENCE J. VALDEZ)

No. 3:19-00092  DEPUTY CLERK

21 U.S.C. § 841(a)(1)

INDICTMENT

THE GRAND JURY CHARGES:

Introduction

At all times material to this Indictment:

1. **LAWRENCE J. VALDEZ** was an emergency specialist who was licensed by the State of Tennessee Department of Health, Board of Examiners as a medical doctor under license number 37215 since 2002.

2. As part of his practice, **LAWRENCE J. VALDEZ** prescribed controlled substances, including highly addictive opioids, with his Drug Enforcement Administration (DEA) license under DEA License Number BV8142818.

3. Under the Controlled Substances Act, Title 21, United States Code, Section 841(a) et seq., and Title 21, Code of Federal Regulations, Section 1306.04, a prescription for a controlled substance is not legal or effective unless issued for a legitimate medical purpose by a practitioner acting in the usual course of professional practice.

4. **LAWRENCE J. VALDEZ** routinely prescribed various Schedule II controlled substances, including oxymorphone and oxycodone, for his patients outside the usual course of professional practice and without a legitimate medical purpose.

COUNTS 1 through 17

5. Paragraphs 1 through 4 are re-alleged and incorporated by reference as though fully set forth herein.

6. On or about the dates set forth in each count below, in the Middle District of Tennessee,

LAWRENCE J. VALDEZ

did knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of oxymorphone and oxycodone, Schedule II controlled substances, as listed below, without a legitimate medical purpose and outside the usual course of professional practice, each of which constitutes a separate count of this Indictment:

Count	Approximate Date of Distribution	Patient	Controlled Substance
1	February 9, 2017	Patient A	Oxymorphone
2	February 2, 2017	Patient A	Oxymorphone
3	January 16, 2017	Patient A	Oxymorphone
4	January 2, 2017	Patient A	Oxymorphone
5	December 29, 2016	Patient A	Oxymorphone
6	November 16, 2016	Patient A	Oxymorphone
7	October 30, 2016	Patient A	Oxycodone
8	June 21, 2016	Patient A	Oxycodone
9	June 18, 2016	Patient A	Oxycodone
10	March 3, 2017	Patient B	Oxymorphone
11	February 3, 2017	Patient B	Oxymorphone
12	January 3, 2017	Patient B	Oxymorphone


Count	Approximate Date of Distribution	Patient	Controlled Substance
13	December 3, 2016	Patient B	Oxymorphone
14	November 3, 2016	Patient B	Oxymorphone
15	February 15, 2017	Patient C	Oxycodone
16	March 13, 2017	Patient D	Oxymorphone
17	February 25, 2017	Patient D	Oxymorphone

All in violation of Title 21, United States Code, Section 841(a)(1).

A TRUE BILL


FOREPERSON

DONALD Q. COCHRAN
UNITED STATES ATTORNEY


KILBY MACFADDEN
United States Department of Justice
Criminal Division, Fraud Section
Assistant Chief, Health Care Fraud

JOSEPH BEEMSTERBOER
United States Department of Justice
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Deputy Chief, Health Care Fraud