

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 14-**  
**v.** : **DATE FILED:** , 2014  
**KRISTEN E. JACOBS** : **VIOLATIONS:**  
: **21 U.S.C. § 846 (conspiracy to distribute**  
: **controlled substances – 1 count)**  
: **21 U.S.C. § 846 (attempt to possess**  
: **controlled substances with intent to**  
: **distribute – 1 count)**  
: **18 U.S.C. § 2 (aiding and abetting)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about March 2012, to in or about April 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KRISTEN E. JACOBS**

conspired and agreed with persons known and unknown to the grand jury, to knowingly and intentionally distribute mixtures and substances containing detectable amounts of various controlled substances, including oxycodone (a Schedule II substance) and promethazine with codeine (a Schedule V controlled substance) in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**MANNER AND MEANS**

It was a part of the conspiracy that:

2. A person known to the grand jury and referred to here as L.F., without authority, misapplied and stole the identifying information of patients and physicians from a hospital in Philadelphia, Pennsylvania (the hospital). The information stolen from the hospital included the medical license numbers, Drug Enforcement Administration (DEA) registration numbers and National Provider Identification (NPI) numbers of the physicians.

3. L.F. transferred this information to a second person known to the grand jury, referred to here as K.A. K.A. used the stolen physician identifying information to create fraudulent prescription pads purporting to be prescription pads of the physicians whose identifying information had been stolen.

4. K.A. used the stolen patient information to create false and fraudulent Pennsylvania drivers' licenses in the names of patients whose identifying information had been stolen.

5. K.A. and defendant KRISTEN E. JACOBS forged multiple prescriptions in multiple patient names, for Schedule II and V controlled substances, using the fraudulent prescription pads.

6. K.A. and defendant KRISTEN E. JACOBS and others known and unknown to the grand jury purchased oxycodone and promethazine with codeine syrup for cash and using insurance information of the patients whose identities had been stolen, from various pharmacies in and around Philadelphia, Delaware, New Jersey, and elsewhere in Pennsylvania known and unknown to the grand jury, including but not limited to the pharmacies listed below ("the pharmacies") by presenting forged and fraudulent "prescriptions" in the names of various physicians whose identities had been stolen. Defendant JACOBS and K.A. sold the prescription controlled substances to customers.

**OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendant KRISTEN E. JACOBS and persons known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. Starting in or about early 2012, L.F. accessed the computer system at the hospital in order to misapply and steal identifying information of patients and physicians.

2. Between March 2012 and in or around April 2013, defendant KRISTEN E. JACOBS and her co-conspirators presented more than 20 prescriptions for at least 55,200 milligrams of oxycodone, purportedly written by at least four physicians, in the names of more than 20 patient victims whose identities had been stolen, as well as presenting additional forged and fraudulent prescriptions for Schedule IV controlled substances.

3. Starting in or about March 2012, in furtherance of the conspiracy, on or about the dates listed below, defendant KRISTEN E. JACOBS, K.A. and others known and unknown to the grand jury, wrote the following forged and fraudulent "prescriptions" for the drugs listed below, which defendant JACOBS, K.A. and others presented at the pharmacies listed below, which drugs defendant JACOBS and K.A. then sold to customers; the obtaining and selling of drugs under each forged and fraudulent "prescription" constituting a separate overt act committed in the Eastern District of Pennsylvania and elsewhere:

<b>Overt Act</b>	<b>Date</b>	<b>Drug</b>	<b>Dosage</b>	<b>Tablets</b>	<b>Initials of Physician</b>	<b>Initials of Patient Victim</b>	<b>Pharmacy</b>
4	5/12/2012	Oxycodone	10/325 mg	120	A.C.	M.L.	CVS, 7065 Lincoln Drive, Philadelphia PA
5	5/17/2012	Oxycodone	10/325 mg	120	A.K.	T.J.	CVS, 1200 Wilmington Pike, West Chester PA

Overt Act	Date	Drug	Dosage	Tablets	Initials of Physician	Initials of Patient Victim	Pharmacy
6	6/8/2012	Oxycodone	30 mg	120	A.K.	G.N.M.	Rite Aid, 636 S. Maryland Avenue, Wilmington DE
7	6/9/2012	Oxycodone	10/325 mg	120	A.K.	J.W.	CVS, 3015 East Lincoln Highway, Thorndale PA
8	6/15/2012	Oxycodone	30 mg	120	A.C.	Y.Y.	Walgreens, 300 North 63 <sup>rd</sup> Street Philadelphia PA
9	6/15/2012	Oxycodone	30 mg	120	A.K.	J.T.	Walgreens, 51 Baltimore Pike, Glen Mills PA
10	6/16/2012	Oxycodone	30 mg	120	A.C.	A.H.	CVS, 295-299 East Baltimore Pike, Media PA
11	6/26/2012	Oxycodone	30 mg	120	J.S.	A.B.	Walgreens, 190 Wilmington West Chester Pike, Concord Township PA
12	6/30/2012	Oxycodone	30 mg	120	A.C.	J.B.	Walgreens, 300 North 63 <sup>rd</sup> Street Philadelphia PA
13	6/30/2012	Oxycodone	30 mg	120	A.C.	E.C.	Walgreens, 300 North 63 <sup>rd</sup> Street, Philadelphia PA
14	6/30/2012	Oxycodone	10/325 mg	120	A.C.	B.S.	Walgreens, 300 North 63 <sup>rd</sup> Street, Philadelphia PA
15	6/30/2012	Oxycodone	10/325 mg	120	A.C.	G.M.	Walgreens, 300 North 63 <sup>rd</sup> Street, Philadelphia PA
16	7/7/2012	Oxycodone	30 mg	120	A.K.	C.J.	CVS, 290 Pottstown Avenue, Pennsburg PA
17	7/14/2012	Oxycodone	30 mg	120	A.C.	E.L.	CVS, 105 East Uwchlan Avenue, Exton PA
18	8/7/2012	Oxycodone	10/325 mg	120	A.C.	A.M.	CVS 295-299 East Baltimore Pike, Media PA
19	8/7/2012	Oxycodone	30 mg	120	A.C.	M.B.	CVS 3 S. Pennell Road, Media PA
20	10/27/2012	Oxycodone	30 mg	120	A.C.	I.V.L.	Rite Aid 66 E. Glenwood Avenue, Smyrna DE
21	10/30/2012	Oxycodone	30 mg	120	G.D.	M.S.	Walgreens 1601 Naamans Road, Wilmington DE
22	11/10/2012	Oxycodone	10/325 mg	120	G.D.	C.M.	Rite Aid 200 Pharmacy Road, Smyrna DE

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 26, 2012, in Concord Township, in the Eastern District of Pennsylvania and elsewhere, defendant

**KRISTEN E. JACOBS**

knowingly and intentionally attempted to possess with intent to distribute a controlled substance, that it, a mixture and substance containing a detectable amount of oxycodone (a Schedule II substance), in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Section 846 set forth in this Indictment, defendant

**KRISTEN E. JACOBS**

shall forfeit to the United States of America:

- a. any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of, such offenses; and
- b. any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

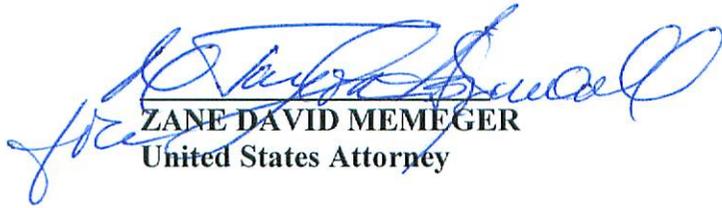
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

GRAND JURY FOREPERSON

  
**ZANE DAVID MEMEGER**  
United States Attorney