

IN THE CLARK COUNTY CIRCUIT COURT II
STATE OF INDIANA

STATE OF INDIANA

VS.

JENNIFER L. DANIEL

DOB: 7/22/1979

INFORMATION

COUNT I - INTERFERENCE WITH MEDICAL SERVICES (LEVEL 5 FELONY)
I.C. 35-45-21-5(b) and I.C. 35-45-21-5(c)(2)

On or about November 20, 2018, in Clark County, State of Indiana, Jennifer L. Daniel, being a licensed health care professional, to wit: a Registered Nurse; did knowingly or intentionally physically interrupt, obstruct, or alter the delivery or administration of a prescription drug, to wit: Hydrocodone; prescribed for A.B., a resident at Clark Rehab in Clarksville.

COUNT II - INTERFERENCE WITH MEDICAL SERVICES (LEVEL 5 FELONY)
I.C. 35-45-21-5(b) and I.C. 35-45-21-5(c)(2)

On or about December 10, 2019, in Clark County, State of Indiana, Jennifer L. Daniel, being a licensed health care professional, to wit: a Registered Nurse; did knowingly or intentionally physically interrupt, obstruct, or alter the delivery or administration of a prescription drug, to wit: Hydrocodone; prescribed for C.M., a resident at Lake Pointe Village in Scottsburg, by obtaining the medication from the CVS #10757 in Clark County and failing to deliver the medication to the resident.

COUNT III - INTERFERENCE WITH MEDICAL SERVICES (LEVEL 5 FELONY)
I.C. 35-45-21-5(b) and I.C. 35-45-21-5(c)(2)

On or between December 24, 2018 and May 3, 2019, in Clark County, State of Indiana, Jennifer L. Daniel, being a licensed health care professional, to wit: a Registered Nurse; did knowingly or intentionally physically interrupt, obstruct, or alter the delivery or administration of a prescription drug, to wit: Hydrocodone; prescribed for G.W., a resident at Riverview Village in Clarksville.

COUNT IV - INTERFERENCE WITH MEDICAL SERVICES (LEVEL 5 FELONY)
I.C. 35-45-21-5(b) and I.C. 35-45-21-5(c)(2)

On or about April 18, 2019, in Clark County, State of Indiana, Jennifer L. Daniel, being a licensed health care professional, to wit: a Registered Nurse; did knowingly or intentionally physically interrupt, obstruct, or alter the delivery or administration of a prescription drug, to wit: Hydrocodone; prescribed for M.K., a resident at Riverview Village in Clarksville.

COUNT V - FORGERY OF PRESCRIPTION FOR LEGEND DRUGS (LEVEL 6 FELONY)
I.C. 16-42-19-16(5) and I.C. 16-42-19-27(a)

On or about January 2, 2019, in Clark County, State of Indiana, Jennifer L. Daniel did knowingly make or utter a false or forged prescription or written order for Hydrocodone, presented to the CVS Pharmacy #3962 in Sellersburg.

COUNT VI - FORGERY OF PRESCRIPTION FOR LEGEND DRUGS (LEVEL 6 FELONY)
I.C. 16-42-19-16(5) and I.C. 16-42-19-27(a)

On or about February 7, 2019, in Clark County, State of Indiana, Jennifer L. Daniel did knowingly make or utter a false or forged prescription written order for Hydrocodone,

presented to the CVS Pharmacy #3962 in Sellersburg.

**COUNT VII - OBTAINING A CONTROLLED SUBSTANCE BY FRAUD OR DECEIT (LEVEL 6
FELONY)**

I.C. 35-48-4-14(c)

On or about January 2, 2019, in Clark County, State of Indiana, Jennifer L. Daniel did knowingly or intentionally acquire possession of a controlled substance by fraud, deceit or subterfuge; to wit: obtained Hydrocodone from the CVS Pharmacy #3962 in Sellersburg by means of a forged prescription.

**COUNT VIII - OBTAINING A CONTROLLED SUBSTANCE BY FRAUD OR DECEIT (LEVEL 6
FELONY)**

I.C. 35-48-4-14(c)

On or about February 7, 2019, in Clark County, State of Indiana, Jennifer L. Daniel did knowingly or intentionally acquire possession of a controlled substance by fraud, deceit or subterfuge; to wit: obtained Hydrocodone from the CVS Pharmacy #3962 in Sellersburg by means of a forged prescription.

**COUNT IX - OBTAINING A CONTROLLED SUBSTANCE BY FRAUD OR DECEIT (LEVEL 6
FELONY)**

I.C. 35-48-4-14(c)

On or about December 10, 2019, in Clark County, State of Indiana, Jennifer L. Daniel did knowingly or intentionally acquire possession of a controlled substance by fraud, deceit or subterfuge; to wit: obtained Hydrocodone prescribed for patient C.M. from the CVS Pharmacy # 10757 in Clarksville, and did not subsequently deliver or administer that medication to the patient.

All of which is contrary to the form of the statute(s) in such cases made and against the peace and dignity of the State of Indiana.

I AFFIRM, UNDER PENALTIES FOR PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE.

/s/ Maureen M. Devlin

Maureen Devlin
Deputy Attorney General
State of Indiana
Attorney #: 18607-49