

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

FILED  
2019 AUG 13 P 3:27  
Grand Jury N-18-2

UNITED STATES OF AMERICA

U.S. DISTRICT COURT  
NEW HAVEN

CRIMINAL NO. 19cr 204 (JAM)

v.

JENNIFER FARRELL

VIOLATION:

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)  
(Distribution of narcotics outside the  
scope of professional practice and not for  
a legitimate medical purpose)

INDICTMENT

The Grand Jury charges:

Background

1. Defendant JENNIFER FARRELL was a medical resident at Yale New Haven Health (“YNHH”) in the Emergency Department, from in or about July 2017 until in or about June 2019. During that time FARRELL resided in New Haven, Connecticut.

2. The Controlled Substance Act (“CSA”), codified at Title 21, United States Code, Section 801 *et seq.* and its implementing regulations, governs the possession, manufacture, distribution, dispensing, administering, and prescribing of controlled substances within the United States. The CSA provides that a prescription for a controlled substance must be issued for a legitimate medical purpose by a practitioner acting in the usual course of her professional practice.

3. Under the CSA, there are five schedules of controlled substances—Schedules I, II, III, IV and V. Controlled substances are scheduled into these levels based on their potential for abuse, among other things. Oxycodone is the generic name for an addictive prescription painkiller that is classified under the CSA as a Schedule II controlled substance.

4. The CSA further provides that all persons who issue prescriptions for controlled substances must be registered with the Drug Enforcement Administration (“DEA”) at any location where controlled substances are stored, dispensed, or administered. If a practitioner does not store, administer, or dispense controlled substances, she is required to be registered at her primary business location where prescriptions for controlled substances are written. The DEA assigns a unique identification number to registered prescribers.

5. Beginning in or about July 2017, when FARRELL became a resident at YNHH and at all times relevant to this indictment, FARRELL had a 4-digit suffix code to use with YNHH’s DEA registration number, which allowed her to write prescriptions for controlled substances. In addition, beginning in mid-July 2017 and at all times relevant to this indictment, FARRELL was licensed as a (i) Resident Physician by the State of Connecticut, Department of Public Health, and (ii) Controlled Substance Practitioner by the State of Connecticut, Department of Consumer Protection, Drug Control Division for Schedule II, III, IV and V controlled substances.

6. Beginning in or about March 2018 and ending in or about March 2019, FARRELL wrote prescriptions for oxycodone, a Schedule II controlled substance, for non-legitimate medical purposes outside the scope of her professional practice in the name of several individuals, including individuals with initials C.T., J.M., M.C., N.G., J.O., and S.W.

COUNTS ONE AND TWO  
(Distribution of Narcotics)

7. Paragraphs 1 through 6 are incorporated by reference.

8. On or about March 2, 2019 and March 11, 2019, FARRELL wrote prescriptions for oxycodone immediate release 30 milligram (“mg”) tablets, with the

diagnosis code V29.9XXA (motorcycle crash), for C.T. C.T. never met FARRELL, never received medical assistance from FARRELL, and at the time the prescriptions were written, was not aware that FARRELL had written them. C.T. was not in a motorcycle crash in 2019; however, C.T.'s YNHH medical records show that in March 2014, C.T. was treated at YNHH for injuries sustained in a motor vehicle accident. FARRELL had access to these medical records.

9. J.M., a friend of C.T., picked up both prescriptions from the pharmacy, without C.T.'s prior knowledge.

10. On or about March 12, 2019, FARRELL called C.T. and asked her to fabricate a story about the prescriptions based on C.T.'s medical history.

11. On or about the dates listed below, in the District of Connecticut, the defendant, JENNIFER FARRELL, knowingly and intentionally distributed, outside the usual course of professional practice and not for a legitimate medical purpose, the below-noted number of pills, each pill containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, each distribution constituting a separate count of this Indictment:

COUNT	DATE	DESCRIPTION
1	3/2/2019	42 pills; oxycodone immediate release 30mg
2	3/11/2019	60 pills; oxycodone immediate release 30mg

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

COUNTS THREE THROUGH TWELVE  
(Distribution of Narcotics)

12. Paragraphs 1 through 6 are incorporated by reference.

13. Beginning in or about October 2018 and ending in or about March 2019, FARRELL wrote at least nine oxycodone prescriptions for J.M.

14. J.M. did not visit any YNHH medical facility for medical services between January 1, 2017 and July 31, 2019, and FARRELL did not see J.M. for any medical purpose at any YNHH facility during the entire period of FARRELL's Emergency Department residency.

15. On or about the dates listed below, in the District of Connecticut, the defendant, JENNIFER FARRELL, knowingly and intentionally distributed, outside the usual course of professional practice and not for a legitimate medical purpose, the below-noted number of pills, each pill containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, each distribution constituting a separate count of this Indictment:

COUNT	DATE	DESCRIPTION
3	10/25/2018	65 pills; oxycodone immediate release 30mg
4	11/09/2018	50 pills; oxycodone immediate release 30mg
5	1/02/2019	50 pills; oxycodone immediate release 30mg
6	1/12/2019	50 pills; oxycodone immediate release 30mg
7	1/30/2019	60 pills; oxycodone immediate release 30mg
8	2/08/2019	60 pills; oxycodone immediate release 30mg
9	2/17/2019	60 pills; oxycodone immediate release 30mg
10	2/26/2019	60 pills; oxycodone immediate release 30mg
11	3/06/2019	60 pills; oxycodone immediate release 30mg

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



COUNTS TWELVE THROUGH TWENTY-SEVEN  
(Distribution of Narcotics)

16. Paragraphs 1 through 6 are incorporated by reference.

17. Beginning in or about March 2018 and ending in or about February 2019, FARRELL wrote at least sixteen oxycodone prescriptions for M.C.

18. FARRELL did not see M.C. for any medical purpose at any YNHH facility during the entire period of FARRELL's Emergency Department residency.

19. Other than on September 21, 2018, M.C. was not treated at any YNHH facility on any of the dates that FARRELL wrote oxycodone prescriptions for M.C. On September 21, 2018, M.C. was treated at the YNNH St. Raphael campus for an ankle injury. FARRELL did not treat M.C., and M.C.'s treatment team did not prescribe M.C. oxycodone.

20. On or about the dates listed below, in the District of Connecticut, the defendant, JENNIFER FARRELL, knowingly and intentionally distributed, outside the usual course of professional practice and not for a legitimate medical purpose, the below-noted number of pills, each pill containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, each distribution constituting a separate count of this Indictment:

COUNT	DATE	DESCRIPTION
12	3/12/2018	60 pills; oxycodone immediate release 30mg
13	4/06/2018	60 pills; oxycodone immediate release 30mg
14	9/21/2018	60 pills; oxycodone immediate release 30mg
15	10/04/2018	60 pills; oxycodone immediate release 30mg
16	10/16/2018	60 pills; oxycodone immediate release 30mg
17	10/16/2018	60 pills; oxycodone immediate release 15mg

COUNT	DATE	DESCRIPTION
18	10/20/2018	60 pills; oxycodone immediate release 30mg
19	11/12/2018	60 pills; oxycodone immediate release 30mg
20	11/28/2018	80 pills; oxycodone immediate release 30mg
21	12/19/2018	80 pills; oxycodone immediate release 30mg
22	1/06/2019	60 pills; oxycodone immediate release 30mg
23	1/06/2019	50 pills; oxycodone 20mg
24	1/20/2019	60 pills; oxycodone immediate release 30mg
25	1/30/2019	60 pills; oxycodone immediate release 30mg
26	2/11/2019	60 pills; oxycodone immediate release 30mg
27	2/27/2019	80 pills; oxycodone immediate release 30mg

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

COUNTS TWENTY-EIGHT THROUGH THIRTY-ONE  
(Distribution of Narcotics)

21. Paragraphs 1 through 6 are incorporated by reference.

22. Beginning in or about November 2018 and ending in or about March 2019, FARRELL wrote four oxycodone immediate release 30mg prescriptions for N.G.

23. N.G. was not treated at any YNHH facility on any of the dates that FARRELL wrote oxycodone prescriptions for N.G., and FARRELL did not see N.G. for any medical purpose at any YNHH facility during the entire period of FARRELL's Emergency Department residency.

24. M.C. picked up all four prescriptions from the pharmacy.

25. On or about the dates listed below, in the District of Connecticut, the defendant, JENNIFER FARRELL, knowingly and intentionally distributed, outside the

usual course of professional practice and not for a legitimate medical purpose, the below-noted number of pills, each pill containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, each distribution constituting a separate count of this Indictment:

COUNT	DATE	DESCRIPTION
28	11/15/2018	40 pills; oxycodone immediate release 30mg
29	12/24/2018	25 pills; oxycodone immediate release 30mg
30	2/14/2019	60 pills; oxycodone immediate release 30mg
31	3/06/2019	60 pills; oxycodone immediate release 30mg

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

COUNT THIRTY-TWO  
(Distribution of Narcotics)

26. Paragraphs 1 through 6 are incorporated by reference.

27. On or about November 23, 2018, FARRELL wrote an oxycodone immediate release 30mg prescription for J.O.

28. J.O. was not treated at any YNHH facility on November 23, 2018, and FARRELL did not see J.O. for any medical purpose at any YNHH facility during the entire period of FARRELL's Emergency Department residency.

29. M.C. picked up this prescription from the pharmacy.

30. On or about November 23, 2018, in the District of Connecticut, the defendant, JENNIFER FARRELL, knowingly and intentionally distributed, outside the usual course of professional practice and not for a legitimate medical purpose, 30 pills, each pill containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

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

COUNTS THIRTY-THREE THROUGH THIRTY-FIVE  
(Distribution of Narcotics)

31. Paragraphs 1 through 6 are incorporated by reference.

32. Beginning in or about February 2019 and ending in or about March 2019, FARRELL wrote three oxycodone immediate release 30mg prescriptions for S.W.

33. S.W. was not treated at any YNHH facility on any of the dates of the oxycodone prescriptions written by FARRELL, and FARRELL did not see S.W. for any medical purpose at any YNHH facility during the entire period of FARRELL’s Emergency Department residency.

34. On or about the dates listed below, in the District of Connecticut, the defendant, JENNIFER FARRELL, knowingly and intentionally distributed, outside the usual course of professional practice and not for a legitimate medical purpose, the below-noted number of pills, each pill containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

COUNT	DATE	DESCRIPTION
33	2/27/2019	40 pills; oxycodone immediate release 30mg
34	3/05/2019	42 pills; oxycodone immediate release 30mg
35	3/13/2019	60 pills; oxycodone immediate release 30mg

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

FORFEITURE ALLEGATION  
(Controlled Substance Offenses)

35. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Thirty-five of this Indictment, defendant JENNIFER FARRELL shall



shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations of Title 21, United States Code, Section 841, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, and a sum of money equal to the total amount of proceeds obtained as a result of the offenses.

36. If any of the above-described forfeitable property, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence, has been transferred, sold to, or deposited with a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or 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 said defendant(s) up to the value of the forfeitable property described above

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/s/

FOREPERSON



LEONARD C. BOYLE  
FIRST ASSISTANT UNITED STATES ATTORNEY



HEATHER L. CHERRY  
ASSISTANT UNITED STATES ATTORNEY