

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 20-cr-67 CMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. KURT VASQUEZ,

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

On or about September 26, 2019 in the State and District of Colorado, the defendant,

KURT VASQUEZ,

did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation, in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, the United States Food and Drug Administration ("FDA") and the United States Drug Enforcement Administration ("DEA"), in that the defendant falsely stated to an FDA Special Agent and a DEA Diversion Investigator that "the only thing I took from [HOSPITAL] was propofol," when, in fact, as the defendant then and there well know and believed, the defendant had also taken fentanyl from HOSPITAL, the identity of which is known to the Grand Jury.

All in violation of 18 U.S.C. § 1001(a)(2)

COUNT 2

On or about September 26, 2019 in the State and District of Colorado, the defendant,

KURT VASQUEZ,

did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation, in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically the United States Food and Drug Administration ("FDA") and the United States Drug Enforcement Administration ("DEA"), in that the defendant falsely stated "I wasn't taking it at work," when, in fact, as the defendant then and there well knew and believed, the defendant was using propofol and fentanyl at HOSPITAL, the identity of which is known to the Grand Jury.

All in violation of 18 U.S.C. § 1001(a)(2)

COUNT 3

On or about and between June 30, 2019 and September 17, 2019 in the State and District of Colorado, the defendant,

KURT VASQUEZ,

knowingly and intentionally acquired and obtained possession of a controlled

substance, fentanyl, by misrepresentation, fraud, deception and subterfuge.

All in violation of Title 21, United States Code, Section 843(a)(3) and (d)(1).

A TRUE BILL:

Ink signature on file in Clerk's Office
FOREPERSON

JASON R. DUNN
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