COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY Magisterial District Number: 05-2-14

POLICE CRIMINAL COMPLAINT **COMMONWEALTH OF PENNSYLVANIA**

MDJ: Hon. Richard D. Olasz Jr. Address: 2629 Skyline Drive West Mifflin,Pa 15122					First Name N				NE le Name	Las		EHAUF	Ge	
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POLICE CRIMINAL COMPLAINT

Dock	et Number:	Date Filed: スタタン	OTN/Live	Scan Number) - 855462-6	Complaint/Incident Number					
Defe	ndant Name	First: RENA		Middle:	Last: SCHLEEHAUF					
2.	l ask that a warr	ant of arrest or a	summons b	pe issued and that the defendan	at be required to answer the charges I have					
3.	I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S.§4904) relating to unsworn falsification to authorities.									
4.	This complaint is	comprised of the	preceding	Page(s) number throug	h					
5.	I certify that this System of Penn information and o	sylvania that req	th the prov uire filing	visions of the Case Records P confidential information and do	ublic Access Policy of the Unified Judicial ocuments differently than non-confidential					
	Pennsylvania and (Before a warrar	were contrary to	the Act(s) o	of the Assembly, or in violation o	peace and dignity of the Commonwealth of f the statutes cited. must be completed, sworn to before the					
	(Date)	100	(Year)	(Signature of Affia	ant)					
	ffidavit of probable	. (I certify that the complaint pefore a warrant can be issued.	has been properly completed and verified.					
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(Magi	sterial District Court N	,	g Authority)	D. OLASZ, JR.,						

RICHARD D. OLASZ, IR., MAGISTERIAL DISTRICT JUDGE MAGISTERIAL DISTRICT 05-2-14 MY COMMISSION EXPIRES ON THE FIRST MONDAY IN JANUARY, 2026

AFFIDAVIT OF PROBABLE CAUSE

James B Embree, Narcotics Agent, of the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations assigned to the Bureau of Narcotics Investigation and Drug Control Region 6 Butler, And Sargent Christopher Mordaunt of the West Mifflin Police Department, being duly sworn according to law, deposes and says:

Your Affiants are empowered by law to conduct investigations and make arrests for offenses involving violations of the Crimes Code of Pennsylvania. In the course of his/her official duties, your Affiants have personally been involved in an investigation into allegations that Rena Lynne Schleehauf did commit the multiple violations of Pennsylvania Title 35 and Pennsylvania Title 18.

On February 20, 2020, the 46th Statewide Investigating Grand Jury issued Presentment No.2 and recommended that criminal charges be filed against Rena Lynne Schleehauf for violations of the Crimes Code of Pennsylvania. The aforementioned Presentment was accepted by the Honorable Jeffrey A. Manning, Supervising Judge of the 46th Statewide Investigating Grand Jury by Order dated February 20, 2020.

Having read and reviewed the Presentment, and after having participated in this investigation and considering all the facts and circumstances, your Affiants are adopting the Presentment and incorporating it fully into this Affidavit of Probable Cause (A copy of the Presentment is attached hereto). Based upon my review of the

testimony given before the Grand Jury and the documents produced for the Grand Jury, We believe that the testimony of the various witnesses is accurately summarized in the Presentment and that the records referred to in the Presentment are stated accurately.

Based upon my review of the evidence, I have concluded that there is probable cause to believe that Rena Lynne Schleehauf engaged in illegal activities which are accurately summarized in the attached Presentment. I have determined that there is probable cause to conclude that Rena Lynne Schleehauf violated the following laws of the Commonwealth of Pennsylvania:

Narcotics Agent

SWORN TO AND SUBSCRIBED

BEFORE ME THIS <u>38</u> DAY

OF (26150), 2020

INTRODUCTION

We, the members of the Forty-Sixth Statewide Investigating Grand Jury, having received evidence pertaining to violations of the Pennsylvania Crimes Code occurring in and around Allegheny County pursuant to Notice of Submission of Investigation No. 9, do hereby make the following findings of fact and recommendation of charges:

FINDINGS OF FACTS

The Grand Jury conducted an investigation into the theft of more than \$500,000.00 worth of Suboxone from Johnson's Pharmaceutical Services ("Johnson's Pharmaceutical) located in Allegheny County. These thefts were committed by Rena Schleehauf ("Schleehauf") between August 2016 and July 2019 when she was employed by the company.

Detective Christopher Mordaunt ("Detective Mordaunt") of the West Mifflin Police Department appeared before the Grand Jury and testified that in July 2019, he received a telephone call from Matthew Johnson ("Johnson"), the owner of Johnson's Pharmaceutical, after Johnson discovered missing drugs and irregularities in connection with his company's orders. Detective Mordaunt explained that Johnson's Pharmaceutical works directly with assisted living facilities and is not a pharmacy that is open to the general public.

Detective Mordaunt was made aware that from August 2016 through July 2019, Johnson's Pharmaceutical ordered a significant amount of Suboxone. Suboxone is a Schedule III controlled substance that is most commonly used to treat opioid addiction. The Grand Jury learned that because Johnson's Pharmaceutical mainly supplied assisted living facilities, it would be extremely rare for the company to order Suboxone from its supplier.

The Grand Jury heard testimony that a review of invoices issued by Cardinal Health ("Cardinal") revealed that Johnson's Pharmaceutical ordered 2,206 boxes of Suboxone from

Cardinal between August 2016 and July 2019. The total cost of the drugs was \$518,702.85. A review of the records from Johnson's Pharmaceutical showed that these Suboxone orders were made and received by Schleehauf.

The Grand Jury learned that Schleehauf was hired as a pharmacy technician in 2015. She was promoted to the position of lead pharmacy fill technician in 2018. As part of her duties, Schleehauf was responsible for overseeing the pharmacy's inventory, ordering medications and checking new inventory into the pharmacy. Investigation revealed that in August 2016, Schleehauf began ordering Suboxone through Johnson's Pharmaceutical's ordering system. When the inventory would arrive at the pharmacy, Schleehauf would place the boxes of Suboxone in her purse or car. Schleehauf would also hide or destroy the inventory stickers associated with the Suboxone so that her thefts would not be discovered.

Once the ordering and theft of the Suboxone was discovered, Johnson conducted an audit. He observed that the ordering of Suboxone coincided with times when Schleehauf was working. Johnson also observed surveillance video that showed Schleehauf leaving the facility to place items in her car. Detective Mordaunt told the Grand Jury about an incident wherein Schleehauf was observed logging boxes of Suboxone into the pharmacy and then placing the boxes near her purse.

The Grand Jury heard all of the details regarding the number of boxes that were purchased and then stolen by Schleehauf during the course of her employment. The chart below shows the number of boxes purchased and the loss to Johnson's Pharmaceutical per quarter.

QUARTER	UNITS ORDERED	COST
2016, Quarter 3	26	4,814.04
2016, Quarter 4	67	13,348.02
2017, Quarter 1	80	18,381.60
2017, Quarter 2	205	47,102.85
2017, Quarter 3	300	68,931.00
2017, Quarter 4	194	44,575.38
2018, Quarter 1	226	54,524.76
2018, Quarter 2	260	62,727.60
2018, Quarter 3	234	56,454.84
2018, Quarter 4	142	28,468.68
2019, Quarter 1	198	49,964.40
2019, Quarter 2	226	57,250.32
2019, Quarter 3	48	12,159.36
	TOTAL UNITS ORDERED	TOTAL LOSS
	2206	518,702.85

Detective Mordaunt testified that because the finance department at Johnson's Pharmaceutical was not involved in the purchasing of medications, its employee would simply pay the invoices from Cardinal without realizing that Johnson's Pharmaceutical did not carry the medications in its inventory.

The Grand Jury learned that each unit ordered contained 30 doses of 8mg sublingual Suboxone films. Detective Mordaunt testified that, in his experience, an "average" dose is one-to-two sublingual films per day, depending on the user's level of addiction.

Detective Mordaunt and Special Agent James Embree ("SA Embree") of the Pennsylvania Office of Attorney General, approached Schleehauf and asked to speak with her about the thefts. She subsequently provided them with a handwritten statement admitting to the theft of Suboxone.

Schleehauf stated that she was stockpiling the Suboxone for her own use and that she used anywhere between one dose to two boxes (60 doses) per day. Schleehauf gave law enforcement permission to search her personal vehicle and home.

The Grand Jury heard evidence that during the course of the search, Detective Mordaunt and Agent Embree recovered 53 doses of Suboxone from Schleehauf's car. They then traveled to Schleehauf's home in Allegheny County where they recovered 187 sealed boxes of Suboxone (30 doses each) and 4 single dose units. They also recovered 338 empty boxes of Suboxone and 32 Suboxone Cardinal.

While Detective Mordaunt and SA Embree were at the residence, they spoke to Schleehauf's husband, Donald Wislick. ("Wislick"). Wislick admitted that he uses Suboxone and that Schleehauf would occasionally give him some of the strips for his personal use.