

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF WESTMORELAND



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 10-3-02
MDJ: Hon. Charles Conway
Address: 5919 Washington Avenue
Export, PA 15632

DEFENDANT:

(NAME and ADDRESS):

JESSIE SARA KUNKEL
First Name Middle Name Last Name

2507 Covington Court, Murrysville, Pennsylvania 15668

Telephone: (724)327-8322

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-22-2023	Date Filed 3-1-23	OTN/LiveScan Number R441200-4	Complaint/Incident Number BN220110C	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 07/02/1983	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name AKA		Middle Name	Last Name	Gen.
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location			WEIGHT (lbs.) 125
FBI Number	MNU Number			Ft. HEIGHT In. 5 4
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fingerprint Classification:			

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth Approved Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG KATHERINE WYARD

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, SA BRADLEY CAPAN / NA SEAN KIRLEY
(Name of the Affiant)

BADGE # 452 AND 435

(PSP/MP/OETC - Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General
(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

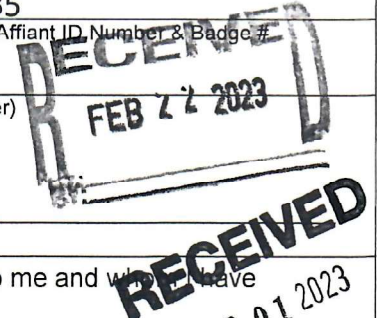
1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____

I accuse the defendant whose name and popular designation or nickname are unknown to me and who I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [437] multiple locations in Pennsylvania (Subdivision Code) (Place-Political Subdivision)

in WESTMORELAND County

[65] (County Code)

on or about January 1, 2019 through present





POLICE CRIMINAL COMPLAINT

Docket Number: CR-22-2023	Date Filed: 3-1-23	OTN/LiveScan Number R 441200-4	Complaint/Incident Number BN220110C
Defendant Name:	First: JESSIE	Middle: SARA	Last: KUNKEL

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	4 Offense#	780-113 Section	A (30) Subsection	of the	TITLE 35 PA Statute (Title)	5 Counts	F Grade	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **POSSESSION WITH INTENT TO DELIVER / DELIVERY OF A CONTROLLED SUBSTANCE**

Acts of the accused associated with this Offense: The Actor, Dr. Jessie Kunkel, did unlawfully, knowingly, or intentionally manufacture, deliver, or possess with intent to manufacture or deliver, a controlled substance by a person not registered under this act, or a practitioner not registered or licensed by the appropriate State board. TO WIT: The Actor, from January 1, 2019 through present, did possess with the intent to deliver controlled substances, Schedule II through Schedule IV, all of which are controlled substances not to be possessed by the Actor outside of the scope of her professional practice, in violation of the Controlled Substance, Drug, Device, and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	5 Offense#	780-113 Section	A (30) Subsection	of the	TITLE 35 PA Statute (Title)	5 Counts	F Grade	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **POSSESSION WITH INTENT TO DELIVER / DELIVERY OF A CONTROLLED SUBSTANCE**

Acts of the accused associated with this Offense: The Actor, Dr. Jessie Kunkel, did conspire to manufacture, deliver, or possess with intent to manufacture or deliver, a controlled substance by a person not registered under this act, or a practitioner not registered or licensed by the appropriate State board. TO WIT: The Actor, from January 1, 2019 through present, did conspire and/or agree with one or more persons to possess with the intent to deliver numerous controlled substances ranging from Schedule II through Schedule IV, all of which are controlled substances not to be possessed by the Actor outside of the scope of her professional practice, in violation of the Controlled Substance, Drug, Device, and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	6 Offense#	780-113 Section	A (16) Subsection	of the	TITLE 35 PA Statute (Title)	5 Counts	M Grade	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **POSSESSION OF A CONTROLLED SUBSTANCE**

Acts of the accused associated with this Offense: The Actor, Dr. Jessie Kunkel, knowingly or intentionally possessing a controlled or counterfeit substance by a person not registered under this act, or a practitioner not registered or licensed by the appropriate State board, unless the substance was obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, or except as otherwise authorized by this act. TO WIT: The Actor, from January 1, 2019 through present, did possess controlled substances, Schedule II through Schedule IV, all of which are controlled substances not to be possessed by the Actor outside of the scope of her professional practice, in violation of the Controlled Substance, Drug, Device, and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).



POLICE CRIMINAL COMPLAINT

Docket Number: CR-22-2023	Date Filed: 3-1-23	OTN/LiveScan Number R4412004	Complaint/Incident Number BN220110C
Defendant Name:	First: JESSIE	Middle: SARA	Last: KUNKEL

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	4117	(a)(2)	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **INSURANCE FRAUD**

Acts of the accused associated with this Offense: On or about February 28, 2021 and various dates thereafter, the Actor did knowingly and with the intent to defraud an insurer or self-insured, namely, Express Scripts, present or cause to be presented to Express Scripts any statement forming a part of or in support of any insurance claim, that contained false, incomplete, or misleading information concerning any fact or thing material to the insurance claim, namely, the Actor fraudulently prescribed and filled several prescriptions for Brian Mohney causing various claims to be filed with Express Scripts, when in fact, these prescriptions were written and filled without MOHNEY's knowledge or consent and MOHNEY did not authorize the use of his health insurance for payment.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: CR-22-2023	Date Filed: 3-1-23	OTN/LiveScan Number	Complaint/Incident Number BN220110C
Defendant Name:	First: JESSIE	Middle: SARA	Last: KUNKEL

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Signature of Affiant)

(Date)

(Year)

AND NOW, on this date

1 MARCH 23

I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

10-3-02

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-22-23.</i>	Date Filed: <i>3-1-23.</i>	OTN/LiveScan Number <i>R 441200-4.</i>	Complaint/Incident Number BN220110C
Defendant Name:	First: JESSIE	Middle: SARA	Last: KUNKEL

AFFIDAVIT of PROBABLE CAUSE

1. Your Affiant, Sean Kirley, is a Narcotics Agent II, employed by the Office of Attorney General ("OAG"), Bureau of Narcotics Investigation and Drug Control ("BNIDC"), and is assigned to Region VI in Butler, Pennsylvania. Your Affiant is currently assigned to the Diversion Unit within BNIDC. This unit is tasked with investigating the illegal diversion of pharmaceuticals. In December 2008, your Affiant received his Municipal Police Officer's Education and Training Certification pursuant to Act 120 and your Affiant has been employed continuously as a law enforcement officer since January 2009. Your Affiant spent over six (6) years working as a uniformed police officer for three boroughs located in Allegheny County, Pennsylvania. From January 2009 to August 2010, your Affiant was employed as a police officer by the Borough of McKees Rocks Police Department. From January 2010 to September 2010, your Affiant was employed as a police officer by the Borough of Coraopolis Police Department. From September 2010 to March 2015, your Affiant was employed by the Borough of Avalon Police Department. While employed by the Borough of Avalon, your Affiant was attached to the Drug Enforcement Administration as a Task Force Officer from October 2012 until December 2014. As such, your Affiant was an "investigator, or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and make arrests for offenses enumerated in Title 18, United States Code, Section 2516. As a Task Force Officer, your Affiant was assigned to the Pittsburgh District Office, which is located in the Western District of Pennsylvania.
2. Your Affiant has worked with BNIDC since March 2015, exclusively involved in the investigation of illegal drug distribution. Your Affiant has participated in more than 150 investigations involving violations of the Controlled Substance Drug Device and Cosmetic Act and the Crimes Code. Your Affiant has completed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated in Section 5724 of the Crimes Code (18 Pa. C.S.A. § 5724) and received Class "A" Certification Number A-5221. As such, your Affiant is authorized to conduct, supervise, and monitor consensual and non-consensual electronic, wire and oral communications and mobile tracking devices, among other investigatory techniques. As an agent of OAG BNIDC, your Affiant is empowered by law to conduct investigations of and make arrests for offenses involving violations of the Controlled Substance, Drug, Device and Cosmetic Act of April 14, 1972 P.L. 233 No. 64, Section 1, et. seq., and related offenses under the Pennsylvania Crimes Code.
3. Your Affiant has completed numerous intensive narcotics training classes from the Drug Enforcement Administration's (DEA) Training Academy located at Quantico, Virginia, and other accredited Law Enforcement Training Academies. Your Affiant has completed trainings from the Drug Enforcement Administration to include classes on conducting financial investigations, understanding money laundering for criminal enterprises, and pharmaceutical diversion training. Your Affiant also has completed the interview and interrogation and advanced interrogation training taught by the John E. Reid and Associates school. Your Affiant is versed in a multitude of arrest procedures, search and seizures, narcotics investigations and identification, undercover techniques, search warrant applications, and various other crimes.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-22-23	Date Filed: 3-1-23	OTN/LiveScan Number R 441200-4	Complaint/Incident Number BN220110C
Defendant Name:	First: JESSIE	Middle: SARA	Last: KUNKEL

4. Your Affiant has become familiar with the methods and techniques associated with the distribution of narcotics, the laundering of drug proceeds, and the organization of drug conspiracies. While conducting these investigations, your Affiant has been involved in the use of the following investigative techniques: interviewing informants and cooperating witnesses, conducting physical surveillance, analyzing electronic surveillance, and preparing and executing search warrants which have led to seizures of narcotics, firearms, contraband, and evidence of criminal activity.
5. Your Affiant has become familiar with the methods of operation typically utilized by individuals who distribute illegal drugs. Your Affiant knows that it is common practice for drug traffickers to routinely utilize cellular telephones, often times multiple mobile phones, computers, prepaid phones, calling cards, cellular telephones subscribed in other people's names, text messaging, Facebook accounts, voice over internet protocol (VOIP) encrypted cellular telephone applications, counter surveillance, false or fictitious identities, and coded communications to communicate with their customers, suppliers, couriers, and other conspirators for the purpose of insulating themselves from detection by law enforcement.
6. Your Affiant is also familiar with tactics used by drug traffickers to elude the efforts of law enforcement while participating in the sale, acquisition, and misrepresentation of illegal and scheduled drugs. Your Affiant has been involved in numerous narcotics investigations which have utilized confidential informants, controlled purchases of narcotics and undercover operations.
7. While with the Drug Enforcement Administration, your Affiant was the affiant on a Federal Title III application in 2014 that resulted in the seizure of large quantities of narcotics and drug proceeds. Your Affiant has conducted multi-state complex conspiracy investigations that involved the use of telecommunication devices
8. As a result of the foregoing training and experience, your Affiant is familiar with the coded and cryptic language used by drug traffickers and the common methods and practices used by drug dealers in furtherance of their drug trafficking enterprises. The opinions expressed and conclusions drawn herein are formed on the basis of the facts and circumstances of this investigation, related investigations and your Affiant's training and experience, and your Affiant holds such opinions to a reasonable degree of professional certainty.
9. Your Affiant, Bradley Capan, is currently employed as a Special Agent with the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, Insurance Fraud Section, Western Regional Office since April 2016. Your Affiant is currently assigned to the Federal Bureau of Investigation (FBI) Western Pennsylvania Healthcare Fraud Task Force. Previously your Affiant was employed as a police officer in the Commonwealth of Virginia and has over 19 years of combined experience as a law enforcement officer.
10. Your Affiant has investigated and participated in numerous criminal investigations involving healthcare fraud, insurance fraud, and financial crimes. Your Affiant has received a variety of



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Defendant Name:	First: JESSIE	Middle: SARA	Last: KUNKEL

training and experience on the following, which is including but not limited to, healthcare fraud, insurance fraud, financial crimes, crimes against persons, crimes against property, identity theft, money laundering, and narcotics. Your Affiant has obtained and participated in the execution of numerous federal and state search warrants.

11. This affidavit contains information pertaining to Doctor (Dr.) Jessie KUNKEL (DO), and how she illegally obtained controlled substances in multiple individual's names without their consent or knowledge. Throughout this affidavit all patients/individuals will be identified by their initials to protect their privacy; however, their identities are known to your Affiants. The facts in this affidavit come from your Affiants personal observations, training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause and does not set forth all your Affiants knowledge about this matter.
12. **Dr. Jessie Sara KUNKEL D.O.**, is/was an Osteopathic Physician and Surgeon. A Doctor of Osteopathic Medicine, also known as a D.O., is a fully trained and licensed doctor that with the appropriate Drug Enforcement Administration (DEA) registration number is legally allowed to prescribe controlled substances to patients. Dr. KUNKEL is identified as an Emergency Room Physician. Dr. KUNKEL was initially licensed with the Pennsylvania State Board of Medicine under license #OS016201 on July 10, 2012. This license was renewed on October 25, 2022 and is set to expire on October 31, 2024.
13. On August 7, 2012, Dr. KUNKEL applied to be registered with the DEA at 201 State Street, Erie, Pennsylvania 16550, the known location of University of Pittsburgh Medical Center (UPMC) Hamot Hospital. Subsequently, Dr. KUNKEL was issued DEA registration FK3412361 and was permitted to prescribe controlled substances in schedules II-V. On December 4, 2014, Dr. KUNKEL requested a modification of registered address from UPMC Hamot Hospital to 2570 Haymaker Road, Monroeville, Pennsylvania 15146, the known location of Forbes Hospital, which was subsequently approved. Due to the fact that Dr. KUNKEL did not renew her DEA registration before the renewal date on December 31, 2017, the DEA registration was expired and retired from DEA's registration system.
14. On November 14, 2018, Dr. KUNKEL submitted a new application to be registered with the DEA at 2507 Covington Court, Murrysville, Pennsylvania 15668. As part of the registration process, this address was discovered to be Dr. KUNKEL's residence. While not mandatory, Dr. KUNKEL was requested to provide a work location. At that time, Dr. KUNKEL reported a work location of 2570 Haymaker Rd., Monroeville, Pennsylvania 15146 (Forbes Hospital). Dr. KUNKEL was subsequently issued DEA Registration# FK8025745 on November 15, 2018 and again permitted to prescribe controlled substances in schedules II-V.
15. Since November 15, 2018, Dr. KUNKEL has made the following changes to her registered address:



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a. On November 1, 2019, the registered address was changed from Forbes Hospital to Conemaugh Nason Medical Center, 105 Nason Drive, Roaring Spring, Pennsylvania 16673

b. On December 20, 2021, the registered address was changed from Conemaugh Nason Medical Center to "Jessie Kunkel, LLC" at her residence, 2507 Covington Court, Murrysville, Pennsylvania 15668

c. On March 21, 2022, the registered address was changed from her residence to Androscoggin Valley Hospital, 59 Page Hill Road, Berlin, New Hampshire 03570

d. On or about August 15, 2022, Dr. KUNKEL requested a change of registered address from Androscoggin Valley Hospital to Coshocton Regional Medical Center, 1460 Orange Street, Coshocton, Ohio 43812. This request remains pending the approval of the DEA Columbus, Ohio District Office.

16. It should be noted that Dr. KUNKEL has been medically licensed in several other states in 2022. On January 13, 2022, Dr. KUNKEL was issued medical license #LT4306 for locum tenens work in New Hampshire, which expired on April 23, 2022. According to the New Hampshire Online Licensing Site, as of November 9, 2022, Dr. KUNKEL has a pending application for a full medical license in New Hampshire. On July 20, 2022, Dr. KUNKEL was issued medical license #34.016035 as a Doctor of Osteopathic Medicine in Coshocton, OH, which remains active until July 20, 2024.
17. On January 25, 2021 Dr. KUNKEL's medical license was suspended and reinstated on March 11, 2021.
18. The suspension caused her to be unlicensed for a period six (6) weeks, from January 25, 2021 to March 11, 2021. During that time Dr. KUNKEL was not medically licensed in the Commonwealth of Pennsylvania, and therefore not able to practice medicine. During this timeframe, the Actor authorized several prescriptions for controlled substances as described later in this affidavit.
19. On July 26, 2022, Drug Enforcement Administration (DEA) Diversion Investigator (DI) Whitney Seka was notified by Rite Aid Pharmacy store number 1726, located at 6531 Route 22, Delmont, Pennsylvania 15626, that they had received an electronic prescription from Doctor (Dr.) Jessie KUNKEL (D.O.) on Wednesday, July 20, 2022. This prescription was for KB and was for Adderall. After the pharmacy filled the prescription for KB, it was picked up via the drive through window. The pharmacy noted an internal discrepancy concerning a miss-count of medication. A pharmacy staff member contacted KB to ensure she received the correct amount of medication in her prescription. KB stated that she did not fill a prescription, nor was she expecting to fill a prescription. Surveillance camera footage revealed that the individual who picked-up the prescription from the drive through was operating a black Mercedes Benz SUV. Dr. KUNKEL is known to drive 2018 Mercedes Benz GLE 350 SUV. The way that Pennsylvania has set up the electronic-prescribing (E-Script) system, only a few individuals would be aware that a prescription was called in for a patient at any pharmacy.



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20. Pennsylvania Prescription Drug Monitoring Program (PDMP) and pharmacy data was analyzed for Dr. KUNKEL's prescribing history under her DEA# FK8025745, from November 2018 through October 2022. Your Affiant's knew that Dr. KUNKEL was an emergency room physician. Due to the short-term nature of the emergency room (ER), it is expected that Dr. KUNKEL prescribed singular, short-term scheduled II-V controlled substances. Investigators found that from November 2018 through October 2022, Dr. KUNKEL issued over 600 controlled substance prescriptions to over 200 patients. It was noted that approximately 16 patients received numerous, repeated controlled substance prescriptions. This is uncharacteristic of prescriptions issued by ER physicians. More so, your Affiant's noted that Dr. KUNKEL consistently prescribed those patients stimulants, such as amphetamine, and/or benzodiazepines such as alprazolam. The controlled substance prescriptions issued to those 16 patients accounted for over 65% (410 prescriptions) of Dr. KUNKEL's total number of controlled substance prescriptions.

21. Investigators obtained an employee file for Dr. KUNKEL from the Highlands Hospital in Connellsville, Pennsylvania, showing Dr. KUNKEL was employed at the hospital from approximately December 22, 2018 through August 6, 2019. The prescribing of short-term controlled substances to individual patients stopped on August 6, 2019, which coincided with KUNKEL's date of resignation from Highlands Hospital; however, Dr. KUNKEL's consistent monthly prescribing to additional patients continued.

22. Further investigation of those purported consistent patients of Dr. KUNKEL who received multiple prescriptions led to the discovery that most were associates of Dr. KUNKEL: family members, co-workers, and friends/social media connections, as further identified in sections below.

23. Over the course of this investigation, copies of prescriptions issued by Dr. KUNKEL were received from several chain pharmacies (Rite Aid Corporation, CVS, Giant Eagle, and Walgreens Pharmacies). Prescriptions consistent with the practice of emergency room medicine (short-term prescriptions issued to individual patients), were found to be written on paper prescriptions reflecting a registered location of "Highlands Hospital", 401 East Murphy Avenue, Connellsville, Pennsylvania 15425. While Dr. KUNKEL issued some prescriptions to her associates on "Highlands Hospital" paper prescriptions early-on, most were primarily called-in to the pharmacies or written on paper prescriptions reflecting a registered location of Dr. KUNKEL's residence, 2507 Covington Court, Murrysville, Pennsylvania 15668. All copies of paper prescriptions reviewed by your Affiants issued by Dr. KUNKEL after 2019, reflected Dr. KUNKEL's residential address, suggesting that she issued those prescriptions in her personal capacity not while affiliated with a hospital. Further, numerous electronic prescriptions issued by Dr. KUNKEL in 2022 also reflected a clinic name of "Dr. Jessie Kunkel, LLC".

24. On August 23, 2022 and October 5, 2022, KB was interviewed by investigators. KB stated that she had met Dr. KUNKEL through an associate with initials ML. KB said that she has known Dr. KUNKEL for approximately a year and a half and had become friends with her over this time. KB



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stated that she has been receiving prescriptions from KUNKEL during this time frame. During these interviews KB admitted to conspiring with Dr. KUNKEL to illegally obtain controlled substances, amphetamine and alprazolam, by fraud. KB stated that during this timeframe she was never evaluated or examined by KUNKEL as a patient. She never saw Dr. KUNKEL at a medical office and only saw Dr. KUNKEL socially. In June 2021, Dr. KUNKEL prescribed 30 alprazolam 0.25 mg tablets to KB, due to her having anxiety about an upcoming flight to Mexico. In December 2021, Dr. KUNKEL prescribed #90 amphetamine 5mg tablets to KB, to help her study/focus for her exams. A search of the PDMP showed that KB received amphetamine and alprazolam prescriptions monthly from December 2021 through July 2022. Those prescriptions were issued by Dr. KUNKEL. KB admitted KUNKEL would ask KB for prescription pills. KB said that she was not aware that KUNKEL had continued to issue prescriptions in her name after April 2022. KB consented to an electronic download of her cellular telephone. Text message conversations between KB and Dr. KUNKEL, corroborated KB's statements. The following are excerpts of text messages between Dr. KUNKEL and KB:

- a. On or around November 14, 2021, Dr. KUNKEL asked KB to help her acquire "Adderall" (amphetamine). KB stated that she instead asked her boyfriend at the time, JB, to help Dr. KUNKEL. According to KB, Dr. KUNKEL drove JB in a black SUV to fill a prescription in JB's name for Vyvanse (amphetamine). According to KB, Dr. KUNKEL paid for the prescription at the pharmacy and kept the entire Vyvanse prescription for herself. A copy of the prescription issued to JB was later acquired, which corroborated the issuance and fill of #30 Vyvanse 30mg capsules issued by Dr. KUNKEL on November 14, 2021.
- b. On December 1, 2021, Dr. KUNKEL again asked KB to help her acquire both "Adderall" (amphetamine) and "Xanax" (alprazolam) via text message and KB agreed. Dr. KUNKEL provided paper prescriptions and cash to KB and KB filled the prescriptions the following day. According to KB, after picking-up the prescriptions from the pharmacy, KB entered Dr. KUNKEL's 2018 black Mercedes SUV and provided approximately half, or #30 alprazolam 0.5mg tablets and #45 amphetamine 5mg tablets, to Dr. KUNKEL. In exchange, Dr. KUNKEL provided KB with \$200.00 either in-cash or via Venmo.
- c. On December 6, 2021 (four days later), Dr. KUNKEL asked KB for additional "Adderall" (amphetamine) via text message. KB agreed and Dr. KUNKEL met KB at KB's residence. KB stated that she provided a "handful" of amphetamine tablets and a "handful" of alprazolam tablets in a clear plastic baggie to Dr. KUNKEL.
- d. On December 13, 2021, Dr. KUNKEL and KB had the following conversation via text message in which they discussed the Adderall (amphetamine) prescription:



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DR: KUNKEL: "...next time I write it for you I can write it for the higher mg (20 mg twice a day) so you will be able to take it everyday and feel normal!!!"

KB: "Yes I have to take like 4 to feel anything"

DR. KUNKEL: "Yea I know, it's fucking stupid how they make you start on such a low dose"

KB: "Yeh it's stupid"

DR. KUNKEL: "Like next time I can write for 20mg pills, 60 of them" ... "And it's just as cheap!"

KB: ... "Oh wow that's awesome. Do you think I should do like an over the phone call incase people start questioning things?"

Dr. KUNKEL did not answer KB's question.

25. The following month, on approximately January 5, 2022, KB again filled prescriptions for amphetamine and alprazolam provided by Dr. KUNKEL. That evening, at approximately 10:27 PM, Dr. KUNKEL drove to KB's apartment to pick-up half of the prescriptions. KB stated that she provided approximately half, or #30 alprazolam 0.5mg tablets and #30 amphetamine 20mg tablets, further contained inside a clear plastic baggie. According to KB, Dr. KUNKEL paid KB \$200.00 via Venmo. This meeting was corroborated by text message exchanges between KB and Dr. KUNKEL.
26. On February 5, 2022, Dr. KUNKEL again asked for amphetamine and alprazolam from KB. Since the monthly prescriptions could not be filled until February 7, 2022, KB offered to provide Dr. KUNKEL with the remainder of pills KB had from the last prescriptions filled in January 2022. Dr. KUNKEL agreed; however, she did not want to wait until KB was available to meet her, so KB directed Dr. KUNKEL to retrieve the pills from KB's apartment. Dr. KUNKEL confirmed with KB via text message, "ok, awesome, thank you so, so much! Ill leave scripts and cash in the same drawer as meds!" KB clarified that Dr. KUNKEL traveled to KB's apartment when no one was home and took approximately #10 amphetamine 20mg tablets and #10 alprazolam 0.5mg tablets that were in prescription bottles that listed KB's name. Dr. KUNKEL left behind \$200.00 and a new paper prescription for KB for both amphetamine and alprazolam.
27. On February 8, 2022, KB filled the new prescriptions issued and left in her apartment by Dr. KUNKEL on February 5, 2022 for #60 amphetamine 20mg tablets and #60 alprazolam 0.5mg tablets. Due to feeling ill that day KB placed half of the prescriptions in a plastic baggie which she left in her mailbox and later that evening Dr. KUNKEL traveled to KB's apartment and retrieved the pills. This was corroborated with text messages exchanged between Dr. KUNKEL and KB.
28. On March 3, 2022, at Dr. KUNKEL's direction, KB traveled to Dr. KUNKEL's residence to retrieve paper prescriptions which Dr. KUNKEL had left for KB on her kitchen table. On or about March 9, 2022, KB filled those prescriptions for #60 amphetamine 20mg tablets and #60 alprazolam 0.5mg tablets issued by Dr. KUNKEL back on March 3, 2022. Once more, Dr. KUNKEL did not want to wait to retrieve half of the prescription until after KB finished working that day, so KB placed half, or #30



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amphetamine 20mg tablets and #30 alprazolam 0.5mg tablets in a plastic baggie and placed the baggie in KB's mailbox. In the afternoon on March 9, 2022, Dr. KUNKEL confirmed with KB via text message that she picked up the pills from KB's mailbox while KB was at work. Venmo transactions reflected that Dr. KUNKEL also sent KB \$200.00 on March 9, 2022

29. On April 7, 2022, via text message, Dr. KUNKEL informed KB that she "figured out" how to electronically transmit prescriptions to the pharmacy and ultimately made plans to acquire the next half of KB's amphetamine and alprazolam prescriptions on April 9, 2022 via text message. On April 9, 2022, Dr. KUNKEL picked-up KB at her apartment in Dr. KUNKEL's black SUV at approximately 7:45 PM (according to text messages) and drove KB to KB's parents' house. That evening, Dr. KUNKEL provided KB with some clonazepam 1mg tablets, which Dr. KUNKEL called "sleeping pills". At approximately 8:25 PM, license plate readers captured Dr. KUNKEL's Mercedes traveling away from KB's parents' house, approximately 3 miles away, at the intersection of Route 48 N and Route 30 in North Versailles.
30. The following day, on April 10, 2022 at 2:36 PM via text message, KB asked Dr. KUNKEL if she could pick-up KB's prescriptions herself. Dr. KUNKEL responded via text, "do they usually id u?" and KB informed Dr. KUNKEL that she was never "carded". According to the copy of the electronic prescription, Dr. KUNKEL transmitted the prescriptions to the pharmacy at 5:50 PM, notably to a different pharmacy than KB had filled at before. According to pharmacy data, KB's prescriptions were picked-up from the pharmacy that day. KB stated that she did not pick-up the prescriptions, nor did KB receive any of the pills from those prescriptions. Dr. KUNKEL had paid KB \$200.00 via Venmo on April 9, 2022 and listed the reason for the payment as "Lashes". On April 10, 2022, KB texted Dr. KUNKEL at 6:31 PM: "What did you Venmo me for? I just noticed that" and Dr. KUNKEL responded at 9:02 PM: "For the meds".
31. According to pharmacy data, in May 2022, June 2022, and July 2022, prescriptions for #60 alprazolam 0.5mg tablets and #60 amphetamine 20mg tablets were issued by Dr. KUNKEL to KB and ultimately picked-up from the pharmacy. KB stated that she did not receive any of the prescription medication, nor was she aware that the prescriptions were issued in May, June, and July 2022. As stated previously in this affidavit, pharmacy staff confirmed a white female driving a dark colored SUV picked-up the prescriptions issued to KB in at least July 2022.
32. As stated previously, according to KB, Dr. KUNKEL never physically examined her, evaluated her vital signs, or collected medical history prior to or while Dr. KUNKEL provided medical advice and issued prescriptions for controlled substances to her. KB stated that she never observed Dr. KUNKEL write anything in a medical chart or take any notes concerning her health information. KB said that Dr. KUNKEL asked for her date of birth multiple times when issuing prescriptions, suggesting that Dr. KUNKEL did not record or maintain KB's personal information.



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33. Investigators acquired copies of all prescriptions issued by Dr. KUNKEL to KB. All 16 prescriptions for controlled substances issued to KB from December 2021 through July 2022 reflected a registered location of Dr. KUNKEL's residence, 2507 Covington Court, Murrysville, Pennsylvania 15668. Additionally, all eight electronic prescriptions for controlled substances issued to KB from April 10, 2022 through July 2022 also indicated a clinic name of "Dr. Jessie KUNKEL, LLC".

34. From December 27, 2018 through October 15, 2022, Dr. KUNKEL issued "ML" 40 controlled substance prescriptions. ML had worked with Dr. KUNKEL in the medical field at one point and knew Dr. KUNKEL as a friend. Dr. KUNKEL first prescribed ML 30 diazepam 5mg tablets on December 27, 2018, on a paper prescription reflecting a registered location of "Highlands Hospital". After that, Dr. KUNKEL issued prescriptions to ML for the following controlled substances filled on the following dates:

- A total of 210 phentermine tablets from March 2019 through May 2020.
- A total of 900 alprazolam tablets from July 2019 through October 2022. It should be noted that the prescription issued on February 3, 2021 was issued when Dr. KUNKEL's medical license was suspended.
- A total of 960 amphetamine tablets from November 2020 through October 2022.

Early prescriptions issued by Dr. KUNKEL to ML through July 2019 were issued on paper prescriptions reflecting "Highlands Hospital"; however, all prescriptions issued after October 2019 were called-in or were written on paper prescriptions that reflected a registered location of Dr. KUNKEL's residence, 2507 Covington Court, Murrysville, Pennsylvania 15668. Additionally, all electronic prescriptions issued from April 19, 2022 through July 8, 2022 listed a clinic name of "Dr. Jessie Kunkel, LLC".

35. Highlands Hospital reported that ML, while a previous patient at Highlands Hospital, was never evaluated or seen by Dr. KUNKEL at the hospital; therefore, it is unlikely that Dr. KUNKEL evaluated ML at Highlands Hospital prior to issuing prescriptions for controlled substances that reflected a registered location of the hospital.

36. Pennsylvania PDMP and pharmacy records/surveillance video showed that Dr. KUNKEL prescribed ML 60 amphetamine 20mg tablets that were filled on or around June 27, 2021. This prescription continued monthly after that date. Most recently, a prescription for amphetamine issued to ML was filled on October 15, 2022.

37. On June 9, 2022, at approximately 9:05 PM, a prescription for ML was picked up from the pharmacy. This prescription was for 60 amphetamine 20mg tablets and was written by Dr. KUNKEL for ML (Rx#3041571). At the same time the prescription was picked up surveillance footage showed Dr. KUNKEL walking to the Rite Aid Pharmacy located in North Huntingdon, Pennsylvania, signing, paying, and taking custody of the medication.



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38. On June 29, 2022, at approximately 1:14 PM, a prescription for 60 alprazolam 0.5mg tablets (Rx# 3041571) was prescribed by Dr. KUNKEL to ML. Rite Aid Pharmacy surveillance video showed a black Mercedes SUV matching Dr. KUNKEL's vehicle on store property at the time the prescription was picked up. Pennsylvania license plate readers (LPR) also captured Dr. KUNKEL's vehicle in the vicinity of the pharmacy around the time that the prescription was picked-up.
39. On July 12, 2022, a prescription for 60 amphetamine 20mg tablets (Rx# 3044229), that was written by Dr. KUNKEL and prescribed to ML was picked up from the Rite Aid pharmacy. At approximately 8:43 PM, this prescription was picked up. At the same time, pharmacy surveillance video showed a black Mercedes SUV matching Dr. KUNKEL's vehicle on pharmacy property. LPR also captured Dr. KUNKEL's Mercedes SUV in the area of the pharmacy around the time the prescription was picked up.
40. On August 1, 2022, at approximately 7:02 PM, a prescription for 60 alprazolam 0.5mg tablets (Rx# 3049788) that was written by Dr. KUNKEL for ML was picked up from the pharmacy. Rite Aid Pharmacy surveillance video showed a black Mercedes SUV matching Dr. KUNKEL's vehicle on pharmacy property at the time the prescription was picked up.
41. On December 13, 2022, ML was interviewed by investigators and questioned regarding the prescriptions that are listed in this affidavit. ML stated that she did not receive these prescriptions; and that she was not aware that Dr. KUNKEL was writing prescriptions in her name. ML stated that she did not give Dr. KUNKEL permission to use her information to obtain controlled substances and she did not give her permission to pick up any prescriptions. ML stated that she had no knowledge whatsoever of any of these prescriptions.
42. Bryan MOHNEY was issued 66 controlled substance prescriptions from January 10, 2019 through October 12, 2022. During this time frame MOHNEY was legally married to Dr. KUNKEL.
43. According to the Pennsylvania PDMP, Dr. KUNKEL has prescribed controlled substances to MOHNEY since at least 2016 using her first issued DEA Registration. Since acquiring her second DEA registration, Dr. KUNKEL has issued prescriptions to MOHNEY on the following dates and for the following controlled substances:
- zolpidem tartrate (a total of #30 dosage units or 300 mgs) on January 28, 2019
 - phentermine (a total of #720 dosage units or 27,000 mgs of phentermine) often monthly from July 2019 through December 2021
 - clonazepam (a total of #1,200 dosage units of 1,200 mgs of clonazepam) on a primarily monthly basis from January 2019 through October 2022
44. It should be noted that on January 30, 2021, when Dr. KUNKEL's medical license was suspended, she called-in a prescription for phentermine (with one refill on February 28, 2022) and a prescription for clonazepam (with one refill on February 28, 2022) for MOHNEY. Most of those prescriptions



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issued by Dr. KUNKEL to MOHNEY were called in to the pharmacy. In 2019 several prescriptions were issued on paper reflecting a registered address of "Highlands Hospital", but the most recent electronic prescriptions sent in June, July, August, and October 2022 listed the registered address as Dr. KUNKEL's residence, 2507 Covington Court, Murrysville, Pennsylvania 15668. Prescriptions from June, July and August 2022 also reflected a clinic name of "Dr. Jessie KUNKEL, LLC".

45. Highlands Hospital reported that no patient file for MOHNEY existed. It is therefore unlikely that Dr. KUNKEL evaluated MOHNEY at Highlands Hospital prior to issuing prescriptions for controlled substances.
46. Surveillance footage was obtained from a Rite Aid Pharmacy in Monroeville, Pennsylvania where MOHNEY's prescriptions were filled.
47. On June 8, 2022, 30 clonazepam 1mg tablets prescribed by Dr. KUNKEL to MOHNEY (Rx# 1107099), were picked up at the Rite Aid Pharmacy in Monroeville, Pennsylvania. At approximately 9:50 PM, surveillance video footage showed a black Mercedes SUV matching Dr. KUNKEL's vehicle on store property at the time the prescriptions were picked up. Also, LPR captured Dr. KUNKEL's Mercedes SUV in the area of the pharmacy around the time the prescription was picked up.
48. On July 7, 2022, a prescription for 30 clonazepam 1mg tablets prescribed by Dr. KUNKEL to MOHNEY (Rx# 1112681) was picked up from the Rite Aid pharmacy. At approximately 9:06 PM, surveillance video showed a black Mercedes SUV matching Dr. KUNKEL's vehicle in the pharmacy parking lot at the time the prescription was picked up. LPR also captured Dr. KUNKEL's Mercedes SUV in the area of the pharmacy around the time the prescription was picked up.
49. On August 8, 2022, 30 clonazepam 1mg tablets prescribed by Dr. KUNKEL to MOHNEY (Rx# 1119050) was picked up at the Rite Aid Pharmacy. At approximately 4:19 PM, surveillance video showed a black Mercedes SUV matching Dr. KUNKEL's vehicle on store property at the time the prescription was picked up.
50. On December 26, 2023, investigators interviewed MOHNEY. During this interview MOHNEY was presented with the information that is listed above concerning prescriptions being filled in his name. MOHNEY stated that he had no knowledge of these prescriptions, and that he did not pick them up himself or tell anyone else to. He stated that he was not aware that Dr. KUNKEL had been writing prescriptions in his name and/or picking them up. MOHNEY is a dentist and spends half of his week in Pennsylvania and the other half in Texas. He said that he was currently married to Dr. KUNKEL; however, he had not lived at the Covington Court address for around three years. He stated that he and Dr. KUNKEL have been separated for the last three years. MOHNEY said that some of the dates that prescriptions were picked up under his name, he was in Texas. MOHNEY stated that he did not give Dr. KUNKEL permission to use his information to obtain controlled substances and he



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did not give her permission to pick up any prescriptions. MOHNEY stated that he had no knowledge whatsoever of any of these prescriptions.

51. Since 2020, MOHNEY was the only individual who Dr. KUNKEL prescribed clonazepam to. However, KB stated during her interview on April 9, 2022, Dr. KUNKEL gave her some "sleeping pills". This was corroborated by text messages between Dr. KUNKEL and KB. KB had a photograph of the sleeping pill that Dr. KUNKEL gave her. Investigators studied the photograph and were able to identify the pill in the photograph as a clonazepam 1mg tablets. The PDMP reflected a recent fill of 30 clonazepam 1mg tablets issued to MOHNEY by Dr. KUNKEL on April 6, 2022.
52. From January 11, 2019 through November 10, 2022, Dr. KUNKEL issued 57 Controlled Substance Prescriptions to BS. Dr. KUNKEL has issued prescriptions to BS on these dates for the following controlled substances:
 - A total of 1,500 alprazolam tablets from March 2019 through November 10, 2022,
 - A total of 919 amphetamine tablets from March 2019 through August 2020.
 - A total of 240 phentermine tablets from August 2020, through August 2021.
 - Dr. KUNKEL has also prescribed BS a total of 8 prescriptions for zolpidem tartrate totaling 120 tablets.
 - One prescription for eszopiclone totaling 60 tablets
 - Benzodiazepines totaling 24 dosage units from 2019 through July 2021
53. Early prescriptions issued to BS were either called-in or issued on paper prescriptions listing Highlands Hospital in Connellsville, Pennsylvania. All prescriptions for amphetamines from March 2020 through August 2020 were issued on paper prescriptions listing Dr. KUNKEL's residence, 2507 Covington Court, Murrysville, Pennsylvania 15668, as Dr. KUNKEL's registered location. Additionally, the most recent prescription issued by Dr. KUNKEL to BS on November 10, 2022, was transmitted electronically and listed Dr. KUNKEL's home address as the registered location.
54. Highlands Hospital reported that no patient file for BS existed. It is therefore unlikely that Dr. KUNKEL evaluated BS at Highlands Hospital prior to issuing prescriptions for controlled substances.
55. June 9, 2022, a prescription for 60 alprazolam 0.5mg tablets (Rx# 1130080) had been prescribed by DR. KUNKEL to BS at a Rite Aid Pharmacy in Pittsburgh. On that date at approximately 8:12 PM surveillance video from the pharmacy showed Dr. KUNKEL walking in the front door of the store. The prescription was picked up moments later. The surveillance video did not show BS entering the store at all on the date around that time.
56. On December 13, 2022, BS was interviewed by investigators and questioned regarding the prescriptions that are listed in this affidavit. BS stated he was previously in a romantic relationship with Dr. KUNKEL. During their relationship Dr. KUNKEL had prescribed BS multiple controlled



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substances. BS stated that Dr. KUNKEL would demand that he give her a certain amount or spill the whole medication with her. BS said that after the relationship ended, he suspected that Dr. KUNKEL was using his information to fill prescriptions in his name because he had received a text message alert from a pharmacy stating that his prescription was ready to be picked up. BS stated that he first called the pharmacy and told them that he did not have any prescriptions called. He told the pharmacy that no one else is authorized to pick up his medication. He stated that he then sent a text message to Dr. KUNKEL and told her that he knew what she was doing and to stop it. Dr. KUNKEL stated that she did not know what BS was talking about. BS later showed investigators the text message conversation between him and Dr. KUNKEL, wherein he sent Dr. KUNKEL a screenshot of the pharmacy alert and told her to stop. BS stated that he did not give Dr. KUNKEL permission to use his personal information to obtain controlled substances and he did not give her permission to pick up any prescriptions.

57. From May 2, 2019 through September 2, 2022, Dr. KUNKEL issued 55 controlled substance prescriptions to AK. AK is the sister of Dr. KUNKEL and resides in Pittsburgh, Pennsylvania. According to the Pennsylvania PDMP, Dr. KUNKEL has prescribed controlled substances to her sister since at least 2016 using her first issued DEA Registration. Since acquiring her second DEA Registration, Dr. KUNKEL has issued prescriptions to AK on the listed dates and for the following controlled substances:

- Alprazolam (a total of #1,000 dosage units or 500 mgs) from May 2019 through March 2020, with two additional prescriptions on April 10, 2021 and September 2, 2022
- A total of 780 phentermine tablets from July through September 2019 and from May 2020 through April 2022
- On occasion, Dr. KUNKEL has also prescribed eszopiclone (60 tablets) and zolpidem tartrate (120 tablets).

It should be noted that one prescription for phentermine (authorizing three refills) was issued on February 4, 2021, when Dr. KUNKEL's medical license was suspended. Most of the controlled substance prescriptions issued to AK by Dr. KUNKEL were called-in to a pharmacy. In 2019 three prescriptions were issued on a paper prescription reflecting Highlands Hospital as Dr. KUNKEL's registered address; however, the most recent prescription issued to AK on 9/2/2022 listed Dr. KUNKEL's residence, 2507 Covington Court, Murrysville, Pennsylvania 15668, as her registered location.

58. Highlands Hospital reported that no patient file for AK existed. It is therefore unlikely that Dr. KUNKEL evaluated AK at Highlands Hospital prior to issuing prescriptions for controlled substances.

59. On December 13, 2022, AK was interviewed by investigators and questioned regarding the prescriptions that are listed in this affidavit. AK stated that she did not receive these prescriptions; and that she was not aware that Dr. KUNKEL was writing prescriptions in her name. AK stated that she did not give Dr. KUNKEL permission to use her information to obtain controlled substances and she did not give her permission to pick up any prescriptions. AK stated that she had no knowledge



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whatsoever of any of these prescriptions. AK also said that she never received a formal health screening form Dr. KUNKEL that would lead her to believe that she was keeping a medical file on her.

60. Dr. KUNKEL issued DC 108 controlled substance prescriptions from April 8, 2020 through February 16, 2022.

61. According to the Pennsylvania PDMP, Dr. KUNKEL has prescribed controlled substances to DC since at least 2016 using her first issued DEA Registration. Since acquiring her second DEA registration, Dr. KUNKEL has issued prescriptions to DC on the following dates and for the following controlled substances:

- A total of 1,680 alprazolam tablets from April 2020 through February 2022.
- A total of 450 amphetamine tablets from May 2021 through February 2022.
- A total of 80 hydrocodone tablets in October and November 2020.
- A total of 1,273 oxycodone tablets from November 2020 through February 2022.

It should be noted that 13 prescriptions were issued to DC between January 25, 2021 and March 11, 2021 when Dr. KUNKEL's medical license was suspended. All copies of prescriptions collected that were issued to DC by Dr. KUNKEL were either called-in to the pharmacy or issued on paper prescriptions that listed Dr. KUNKEL's residence, 2507 Covington Court, Murrysville, Pennsylvania 15668 as the registered address.

62. According to the Pennsylvania PDMP, Dr. KUNKEL prescribed DC a large quantity of opiates, benzodiazepines, and stimulants, totaling over 100 separate controlled substance prescriptions from July 2016 through February 2022. Dr. KUNKEL's prescribing was concerning to Rite Aid pharmacists, as there were multiple concerns documented related to the prescriptions issued to DC. On January 25, 2021, the pharmacist noted that a clinical consultation with an offer of Naloxone would be needed, as the risk for overdose for DC was increased with the concurrent use of opiates and benzodiazepines. On February 19, 2021, the pharmacist noted that they spoke with Dr. KUNKEL to confirm a prescription for 30 Percocet 10/325mg tablets for "severe pain". According to the pharmacy notes, Dr. KUNKEL advised the pharmacist that DC was diagnosed with "chronic interstitial cystitis" and was "having a flare up". On June 22, 2021, a pharmacist noted again speaking with Dr. KUNKEL to confirm a prescription for 25 Percocet 10/325mg tablets for "severe pain". Dr. KUNKEL advised the pharmacist again that DC had "bladder cancer" and was in severe pain. The pharmacist advised Dr. KUNKEL that the pharmacy would fill one more prescription for controlled substances for DC but advised Dr. KUNKEL that DC needed to be referred to a "pain clinic" or "oncology". Afterwards, DC's prescriptions were filled at other chain pharmacies according to the PDMP. All prescriptions issued by Dr. KUNKEL to DC ceased in February 2022. According to DC's personal PDMP report, she has not been prescribed controlled substances in Pennsylvania since.



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63. On December 13, 2022, DC was interviewed by investigators. DC stated that she had met Dr. KUNKEL years before when she was hired to clean her house. DC stated that she has cleaned Dr. KUNKEL's house for multiple years now. DC stated that through general conversation Dr. KUNKEL had learned that DC suffered from interstitial cystitis, which left DC in severe pain. DC stated that Dr. KUNKEL expressed an interest in prescribing her controlled substances to help subdue the pain that she was feeling. DC stated that she did not have bladder cancer, nor did she tell Dr. KUNKEL that she did. DC said that thereafter Dr. KUNKEL began prescribing her controlled medications, Dr. KUNKEL started asking DC for some of the controlled substances that she had prescribed her. In turn, Dr. KUNKEL would prescribe DC a number of controlled substances and in return, DC would give an amount of the medicine back to Dr. KUNKEL. DC stated that she also gave Dr. KUNKEL Ambien sleeping pills that she had obtained from her brother's estate after he had passed away. DC was not aware of how many pills she had given Dr. KUNKEL.

64. DC said that Dr. KUNKEL had asked her if she knew of anyone else they could use to obtain fraudulent controlled prescriptions. DC volunteered her sister-in-law LB. DC stated that LB agreed to obtain the controlled prescriptions under her name. LB was then to give the prescription back to DC. DC said that after she had gotten the medication from LB, she and Dr. KUNKEL would split the medication. DC said they had done this a few times. DC said that she had begun to keep more of the medication for herself but told Dr. KUNKEL that LB had started keeping it for herself. DC said that was a lie that she told to Dr. KUNKEL so that she could keep more medication for herself. It was soon after that Dr. KUNKEL stopped prescribing controlled substances in LB's name.

65. DC stated that she was aware that the prescriptions Dr. KUNKEL was prescribing to her were not being obtained legally or ethically under the medical guidelines. DC stated that Dr. Kunkel had never requested any prior medical charts from her or performed any examination to address her underlying issues. She also said that Dr. KUNKEL never explained the dangers of mixing medication or the potential of overdosing. Dr. KUNKEL had never ordered any blood work for DC to monitor the condition of her cystitis.

66. Dr. KUNKEL issued LB 4 controlled substance prescriptions from September 19, 2022 through October 19, 2022. Dr. KUNKEL issued prescriptions to LB on the following dates and for the following controlled substances:

- A total of 60 alprazolam tablets from September 19, 2022 to October 19, 2022.
- A total of 120 amphetamine tablets from September 19, 2022 to October 19, 2022.

All prescriptions issued to LB were issued electronically, reflecting a registered address of, 2507 Covington Court, Murrysville, Pennsylvania 15668, which is Dr. KUNKEL's residence.

67. Dr. KUNKEL issued SW 18 Controlled Substance Prescriptions from April 22, 2019 through May 23, 2022.



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Defendant Name:	First: JESSIE	Middle: SARA	Last: KUNKEL

68. Dr. KUNKEL has issued primarily monthly prescriptions for 30 phentermine 37.5mg tablets to SW (a total of #480 dosage units or 18,000 mgs) from April 2019 through May 2022. However, one prescription for 60 amphetamine 10mg tablets was issued by Dr. KUNKEL to SW on June 25, 2021. The prescriptions authorized for SW from April 2019 to August 2020 were called-in to the pharmacy. However, paper prescriptions issued since November 2020 listed 2507 Covington Court, Murrysville, Pennsylvania 15668, which is Dr. KUNKEL's residence, as the registered address.
69. On November 17, 2022, Investigators interviewed SW. When asked if she was a patient of Dr. KUNKEL's, SW responded saying she was "sort of" a patient. SW stated that she knows Dr. KUNKEL professionally and personally. SW stated that she would describe Dr. KUNKEL as a family friend, and that is how she met Dr. KUNKEL. SW advised that she never saw Dr. KUNKEL at an office in any medical facility.
70. SW confirmed that she had obtained prescriptions for Phentermine from Dr. KUNKEL. SW stated that she had been going to a nearby weight loss clinic, but after she donated one of her kidneys to her husband, they would no longer prescribe her Phentermine. SW said that Dr. KUNKEL was willing to issue prescriptions to her for the Phentermine, adding that Dr. KUNKEL knew SW had previously been under the care of a doctor for weight loss. SW confirmed that she had never been physically examined by Dr. KUNKEL. SW stated that Dr. KUNKEL would provide her with a hardcopy prescription for Phentermine that included refills. Investigators asked SW about the prescription for the 10mg Amphetamine Salt Combo issued on June 25, 2021. SW stated that she did receive a prescription for Amphetamine and did have it filled, but SW insisted that she never took the medication. SW said she has been a dental assistant for over 30 years, so she had some medical background and decided that she did not want to take the Amphetamine. When asked why she was prescribed Amphetamines, Dr. KUNKEL had told her that maybe it would work better for her than the Phentermine. SW stated that the last time she saw Dr. KUNKEL was at her grandson's kindergarten graduation party last December and Dr. KUNKEL issued her a prescription. According to PDMP data, Dr. KUNKEL had last issued SW a prescription for Phentermine on December 9, 2021. SW later stated that she was concerned that other doctors were not willing to issue her Phentermine due to her having one kidney however, Dr. KUNKEL was willing and would also prescribe her Amphetamines. SW stated that she was never examined by Dr. KUNKEL, medical records never requested, or any health-related testing ordered.
71. Dr. KUNKEL issued JB three controlled substance prescriptions from November 14, 2021 through January 2, 2022.
72. It should be noted that JB has a child with ML, and at the time the following incident occurred, JB was in a romantic relationship with KB. Dr. KUNKEL issued JB a paper prescription for 30 Vyvanse 30mg tablets which listed Dr. KUNKEL's home address, 2507 Covington Court, Murrysville, Pennsylvania 15668.



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73. Dr. KUNKEL has also issued JB monthly non-controlled prescriptions.

74. On December 13, 2022, JB was interviewed by investigators. JB stated that he met Dr. KUNKEL at his daughter's kindergarten graduation party in 2020. Dr. KUNKEL was a friend of her daughter's mother (ML). JB believed that during this party Dr. KUNKEL was first introduced to KB, who he had brought as his girlfriend. JB said that KB and Dr. KUNKEL then became friends. JB said that when KB was studying for esthetician school, Dr. KUNKEL was quick to offer her prescription drugs ranging from sleep medicine to stimulants. JB stated that he was initially prescribed a "sleep medicine" by Dr. KUNKEL but was unable to fill the prescription at the CVS pharmacy inside Target in North Huntingdon, Pennsylvania. Dr. KUNKEL also prescribed JB a prescription for hair growth medicine.

75. JB stated that on November 14, 2021, Dr. KUNKEL asked KB to fill a prescription for her. Allegedly, Dr. KUNKEL was going out of town and needed prescription medication before she left. Due to the fact that KB was sick, JB agreed to fill the prescription for Dr. KUNKEL because Dr. KUNKEL was always willing to help them both. On November 14, 2021, Dr. KUNKEL picked up JB from his apartment in Irwin, Pennsylvania. Dr. KUNKEL wrote out the prescription while they were both in her car. Dr. KUNKEL initially drove JB to the Rite Aid in Monroeville, Pennsylvania, but the pharmacy was closed. JB added that Dr. KUNKEL seemed "out there" (meaning that she appeared physically drowsy and non-cognizant) during the drive. Dr. KUNKEL told JB that she knew there was a 24-hour pharmacy in the Oakland section of Pittsburgh, Pennsylvania, so Dr. KUNKEL drove them both to Oakland where JB dropped off the prescription of amphetamine at the pharmacy. JB stated that while the pharmacy filled the prescription, he waited across the street in a restaurant, while KUNKEL waited in her car. JB said that while he was inside the restaurant, he used the automatic teller machine (ATM) to withdraw money to pay for the prescription. JB said that Dr. KUNKEL did not initially offer to pay for the prescription, but did offer to pay for the medication after the prescription was filled and JB declined. JB gave Dr. KUNKEL the entire prescription consisting of 30 Vyvanse 30mg capsules.

76. JB also stated that he was aware Dr. KUNKEL and KB were sharing the medications that Dr. KUNKEL wrote KB. JB said that Dr. KUNKEL told JB and KB many times, that she couldn't write to herself.

77. On November 17, 2022, investigators executed a search warrant at Dr. KUNKEL's residence of 2507 Covington Court, Murrysville, Pennsylvania 15668. The search warrant included multiple items to be searched for, to include patient files/medical records for any, and all individuals that she has been prescribing controlled substances for. During the execution of the search warrant, Dr. KUNKEL was interviewed by your Affiants. During the interview, Dr. KUNKEL was asked if she had any medical records and/or medical charting history for the individuals that she has been prescribing to. Dr. KUNKEL stated that she did keep medical records for all of her "patients" and said that they were



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maintained on her personal computer. Dr. KUNKEL then directed investigators to her laptop where she opened a web page that directed her to the internet site for “Veradigm” electronic prescriptions. Dr. KUNKEL stated that she maintains all the patient files on this site. Dr. KUNKEL then logged into the site to show investigators where the patient files were stored electronically through “Veradigm”. After viewing the information available on the site, it appeared that Veradigm was primarily a program for issuing and maintaining information related to e-prescribing, and not a program for storing electronic medical records/patient files. DR. KUNKEL was asked if she had any other paper files that contained patient’s health information. Dr. KUNKEL said that she did not have any other files and that all her medical records were maintained on the Veradigm website (storage cloud account). At the conclusion of the search, and after a review of the paper documents seized, it was determined that no other patient files/medical records existed inside of Dr. KUNKEL’s residence. It should be emphasized that 2507 Covington Court, Murrysville, Pennsylvania 15668, is the listed address for “Jessie Kunkel LLC” and the address that is printed on some of the paper prescriptions that she wrote to people. Also seized during the search warrant was a total of 63 Propranolol Hydrochloride 10 MG tablets, 21 Propranolol Hydrochloride 20 MG tablets, 94 Propranolol Hydrochloride 20 MG tablets (different pill manufacturer), 4 Lorazepam 0.5 MG tablets, and 8 Amphetamine and Dextroamphetamine 10 MG tablets.

78. Your Affiants obtained insurance claim billing information from Express Scripts pursuant to a request for information (RFI). According to Express Scripts records, they were billed a total of 66 claims between February 28, 2021 and September 22, 2022 for prescriptions written to Bryan MOHNEY prescribed by the Actor. The total amount Express Scripts paid on those claims was \$242.84. The prescriptions were for albuterol, ciprofloxacin, clonazepam, methylprednisolone, ondansetron, oseltamivir, phentermine, prednisone, propranolol, sulfamethoxazole, tretinoin, and zolpidem tartrate. According to MOHNEY, he did not request and/or receive any of these prescriptions and did not authorize Dr. KUNKEL to utilize his health insurance to pay for the prescriptions.

79. In the Commonwealth of Pennsylvania, Dr. KUNKEL has a requirement to maintain patient files and records of controlled substances. Pursuant to 49 PA Code, Chapter 16.92, the code provides that when prescribing, administering, or dispensing controlled substances, a medical doctor should maintain accurate and complete medical records which document the evaluation and care received by the patient. On the initial occasion when the drug is prescribed, the record must include: (i) the symptoms reported by the patient and observed by the practitioner, (ii) the diagnosis, (iii) the directions given to the patient regarding the use of the drug and (iv) the name, strength, quantity, and date of the prescription. During follow-up appointments, the record must include the items listed in (iv), as well as any additions made relating to the other three requirements (i-iii). A patient’s medical record shall be retained by a physician for at least 7 years from the date of the last medical service for which a medical record entry is required.

80. Additionally, pursuant to the Pennsylvania Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. 780-112(b), a practitioner licensed by law to administer, dispense, or distribute controlled



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substances shall keep a record of all such substances administered, dispensed, or distributed by him/her, showing the amount administered, dispensed, or distributed, and the date, name, and address of the patient. Such records shall be kept for two years from the date of administering, dispensing, or distributing and shall be open for inspection by the proper authorities.

81. 74.P.S. 780-112(c) also provides that all persons licensed to distribute or dispense controlled substances shall keep records and maintain inventories in conformity with the record keeping order form and inventory requirements of Federal Law.

82. Based upon the aforementioned facts and circumstances, your Affiants believe that probable cause exists for the issuance of an arrest warrant for the Actor, Dr. Jessie Kunkel.

I, SA BRADLEY CAPAN / NA SEAN KIRLEY, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

(Signature of Affiant)

Sworn to me and subscribed before me this First day of MARCH 2023
Date Charles K. Conway, Magisterial District Judge

My commission expires first Monday of January, 2024

