

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF BUTLER
 Magisterial District Number: 50-3-02
 MDJ: Hon. LEWIS STOUGHTON
 Address: MAIN STREET
 P.O. BOX 249
 CHICORA, PA 16025
 Telephone: (724)445-3366



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT:

(NAME and ADDRESS):

HEATHER IRENE PRESSDÉE
 First Name Middle Name Last Name Gen

2608 S. MEADOW STREET
 NATRONA HEIGHTS, PA 15065 412 335 3770

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 Deterrn.	<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

Bucket Number CR 177-23	Date Filed 05/24/2023	OTN/Live Scan Number R4826043	Complaint/Incident Number ME220278114N	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 08/29/1982	POB Usa	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name AKA	Middle Name	Last Name	Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	<input type="checkbox"/> Asian	<input type="checkbox"/> Unknown	<input type="checkbox"/> Unknown	
ETHNICITY <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde/ Strawberry)	<input type="checkbox"/> Non-Hispanic	<input type="checkbox"/> Unknown	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)	DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO DNA Location			WEIGHT (lbs.) 240
FBI Number	MNU Number	FT. HEIGHT In. 5 8		
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).

 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, STEPHANIE L. MCELHANEY/KAYLA FANTINI BADGE NUMBER 645 / 578
 (Name of the Affiant) (PSP/MP/OETC Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA0222400
 (Identify Department or Agency Represented and Political Subdivision) (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 nicknames are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [413] _____
 (Subdivision Code) (Police Political Subdivision)

Center Road, Chicora, Pa 16025

in BUTLER County [10] on or about AUGUST 31, 2022 - ~~November 28, 2022~~ DECEMBER 25
 (County Code)

[Signature]
 5/29/23



POLICE CRIMINAL COMPLAINT

Docket Number: CP-17-23	Date Filed: 5/11/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name	First: HEATHER	Middle: IRENE	Last: PRESSDEE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA Code §§ 213.1 - 213.7.)

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 _____
------------------	---	--	--	---

<input type="checkbox"/> 1	2501	A	Offense	TITLE 18	1	H		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	County	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input checked="" type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	---	------------------------------------

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

Acts of the accused associated with this Offense: A person is guilty of criminal homicide if he/she intentionally, knowingly, recklessly or negligently causes the death of another human being TO WIT: The defendant did knowingly and intentionally inject decedent J.B. with approximately 60 units of short-acting insulin on November 19, 2022, to which ultimately caused the death of the decedent.

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 1
------------------	---	--	--	--

<input type="checkbox"/> 2	2501	A	Offense	TITLE 18	1	H		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	County	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): **CRIMINAL HOMICIDE**

Acts of the accused associated with this Offense: A person is guilty of criminal homicide if he/she intentionally, knowingly, recklessly or negligently causes the death of another human being TO WIT: The defendant did knowingly and intentionally inject decedent J.C. with approximately 60 units of short-acting insulin on November 19, 2022, to which ultimately caused the death of the decedent.

Inchoate Offense	<input checked="" 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 1
------------------	--	--	--	--

<input type="checkbox"/> 3	2501	A	Offense	TITLE 18	1	FI		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	County	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): **CRIMINAL ATTEMPT HOMICIDE**

Acts of the accused associated with this Offense: A person is guilty of an attempted criminal homicide if he/she intentionally, knowingly, recklessly or negligently attempted causes the death of another human being TO WIT: The defendant did knowingly and intentionally inject victim E.A. on August 31, 2022, with approximately 100 units of long-acting insulin which caused decedent to have a medical emergency leading to hospitalization.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 05/24/2023	OTN/LiveScan Number	Complaint Number MFI220278114N	Incident Number
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDÉE	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

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 _____				
<input type="checkbox"/> 4	2713	A1	TITLE 18	1	F1			
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): NEGLECT OF A CARE DEPENDENT PERSON								
Acts of the accused associated with this Offense: A person who intentionally or knowingly uses a physical restraint or chemical restraint or medication on a care-dependent person, or isolates a care-dependent person contrary to law or regulation, such that bodily injury, serious bodily injury or death results TO WIT: The defendant did intentionally or knowingly inject decedent J.B. with short-acting insulin on November 19, 2022, which ultimately caused the death of the decedent.								

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 _____				
<input type="checkbox"/> 5	2713	A1	TITLE 18	1	F1			
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): NEGLECT OF A CARE DEPENDENT PERSON								
Acts of the accused associated with this Offense: A person who intentionally or knowingly uses a physical restraint or chemical restraint or medication on a care-dependent person, or isolates a care-dependent person contrary to law or regulation, such that bodily injury, serious bodily injury or death results TO WIT: The defendant did intentionally or knowingly inject decedent J.C. with short-acting insulin on November 19, 2022, which ultimately caused the death of the decedent.								

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 1				
<input type="checkbox"/> 6	2713	A1	TITLE 18	1	F1			
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): NEGLECT OF A CARE DEPENDENT PERSON								
Acts of the accused associated with this Offense: A person who intentionally or knowingly uses a physical restraint or chemical restraint or medication on a care-dependent person, or isolates a care-dependent person contrary to law or regulation, such that bodily injury, serious bodily injury or death results TO WIT: The defendant did intentionally or knowingly inject decedent E.A. with short-acting insulin on August 31, 2022, which ultimately contributed to the death of the decedent.								
5/18/2023 5/18/2023 bodily injury								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 05/24/2023	OTN/LiveScan Number	Complaint Number MFI220278114N	Incident Number
Defendant Name	First: HEATHER	Middle: IRENE	Last: PRESSDEE	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

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 _____				
<input type="checkbox"/> 7	2705	A	TITLE 18	1	M2			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>	7	2705	A	TITLE 18	1	M2		
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): RECKLESSLY ENDANGERING ANOTHER PERSON								
Acts of the accused associated with this Offense: A person commits a misdemeanor of the second degree if he recklessly engages in conduct which places or may place another person in danger of death or serious bodily injury TO WIT: The defendant engaged in reckless conduct which placed decedent J.B. in danger of death or serious bodily injury by injecting the decedent with 60 units of short-acting Insulin on November 19, 2022.								

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 1				
<input type="checkbox"/> 8	2705	A	TITLE 18	1	M2			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>	8	2705	A	TITLE 18	1	M2		
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): RECKLESSLY ENDANGERING ANOTHER PERSON								
Acts of the accused associated with this Offense: A person commits a misdemeanor of the second degree if he recklessly engages in conduct which places or may place another person in danger of death or serious bodily injury TO WIT: The defendant engaged in reckless conduct which placed decedent J.C. in danger of death or serious bodily injury by injecting the decedent with 60 units of short-acting Insulin on November 19, 2022.								

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 1				
<input type="checkbox"/> 9	2705	A	TITLE 18	1	M2			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>	9	2705	A	TITLE 18	1	M2		
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): RECKLESSLY ENDANGERING ANOTHER PERSON.								
Acts of the accused associated with this Offense: A person commits a misdemeanor of the second degree if he recklessly engages in conduct which places or may place another person in danger of death or serious bodily injury TO WIT: The defendant engaged in reckless conduct which placed victim E.A. in danger of death or serious bodily injury by injecting the decedent with 100 units of long-acting Insulin on August 31, 2022.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 05/24/2023	OTN/LiveScan Number	Complaint Number MF1220278114N	Incident Number
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

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 _____
------------------	--	---	---	---

<input type="checkbox"/>	10	2702	A1	ARTICLE TITLE 18	1	F1		
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): AGGRAVATED ASSAULT

Acts of the accused associated with this Offense: Attempts to cause serious bodily injury to another, or causes such injury intentionally, knowingly or recklessly under circumstances manifesting extreme indifference to the value of human life TO WIT: The defendant did intentionally, knowingly or recklessly caused serious bodily injury to E.A. on August 31, 2022

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 _____
------------------	--	---	---	---

<input type="checkbox"/>								
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:

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 _____
------------------	--	---	---	---

<input type="checkbox"/>								
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:	Date Filed: 5/24/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

- 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 2.
- 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.)

5/24/23
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date 5/24/23 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.

50-101
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 5/21/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDÉE

AFFIDAVIT of PROBABLE CAUSE

1. Your Affiant is Stephanie McElhaney. Affiant McElhaney is a Narcotics Agent II employed by the Pennsylvania Office of Attorney General (PA OAG), Bureau of Narcotics Investigations and Drug Control (BNIDC). Affiant McElhaney has been employed by the Pennsylvania Office of Attorney General since 2014. Affiant McElhaney is currently assigned to the Region VI Office in the vicinity of Butler, Pennsylvania. Affiant McElhaney has been a sworn law enforcement officer since 2016 and has been assigned to the Bureau of Narcotics Investigation and Drug Control (BNIDC) since 2013 through the Counterdrug Joint Task Force (CJTF). Affiant McElhaney has a Bachelor's of Science in Biology from LaRoche College and an Associates in Applied Communications Technology from the Community College of the Air Force.

2. Your Affiant has conducted investigations involving the prescribing practices of providers in the medical community including doctors, nurses and other health care professionals. Your Affiant has attended Drug Diversion training provided by the National Association of Drug Diversion Investigators and training provided by the Pennsylvania Office of Attorney General. Your Affiant additionally has completed training within the Pennsylvania Medical Society on prescribing practices, pain management prescribing, and opiate prescribing. Your Affiant has also conducted drug investigations involving the delivery and/or possession with intent to deliver various controlled substances including cocaine, crack cocaine, marijuana, methamphetamine and heroin. These investigations have led to the seizure of controlled substances and the arrest and prosecution of offenders. As a result, your Affiant has experience in investigating violations of the Drug Act and the Crimes Code.

3. As an Agent of the Pennsylvania Office of Attorney General, your Affiant is empowered by law to conduct investigations of, and to make arrests for, offenses involving violations of the Controlled Substance, Drug, Device and Cosmetic Act (C.S.D.D.C.A.) of April, 1972, P. L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code. Your Affiant is aware that 28 Pa. Code § 113.30 of the Pennsylvania Administrative Code states that all hospitals in the Commonwealth are responsible to report to The Pennsylvania Office of Attorney General, Bureau of Drug Control, any suspected mishandling of scheduled or controlled drugs. Furthermore, Agents from the Office of Attorney General are a part of a Health Oversight Agency as that term is defined at 45 C.F.R. Section 164.501. Covered entities are permitted to disclose protected health information (PHI) to a health oversight agency pursuant to 45 C.F.R. Section 164.512 (d)(1). Pennsylvania Attorney General's Office Bureau of Drug Control agents are also law enforcement officials as that term is defined at 45 C.F.R. Section 164.501. Covered entities are permitted to disclose PHI to a law enforcement official, pursuant to 45 C.F.R. Section 164.512 (f)(5), for criminal conduct occurring on the premises of a covered entity. 45 C.F.R. Section 164.512(f)(5) further allows for the disclosure of this information in response to an authorized investigative demand.

4. As an Agent of the Pennsylvania Office of Attorney General, your Affiant is empowered by law to conduct investigations of, and to make arrests for, offenses involving violations of the Controlled Substance, Drug, Device and Cosmetic Act (C.S.D.D.C.A.) of April, 1972, P. L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code.

5. Your Affiant is Kayla Fantini. Affiant Fantini is a Special Agent II of the PA OAG Medicaid Fraud Control Section and has been a sworn law enforcement agent since 2018. Affiant Fantini completed the Commonwealth Investigator Training Program in 2019. Prior to being employed with the PA OAG, Affiant Fantini was employed with the Pennsylvania Office of Inspector General (PA OIG) from



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 5/24/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

administrative staff and peers, your Affiants have identified that since 2018 PRESSDEE has been employed at the below listed facilities. Your Affiants have identified a pattern of PRESSDEE being disciplined for abusive behavior towards patients and/or staff at each facility resulting in her resigning or being terminated.

- a. October 2018 - April 2019: Encompass Health Rehabilitation Hospital of Harmarville located at 320 Guys Run Road, Pittsburgh, Allegheny County, PA 15238
- b. April - September 2019: Allegheny Valley Hospital located at 1301 Carlisle Street, Natrona Heights, Allegheny County, PA, 15065
- c. September 2019 - January 2020: Platinum Ridge Center for Rehabilitation & Healing located at 1050 Broadview Blvd, Brackenridge, Allegheny County, PA 15014
- d. February 2020 - April 2020: Orchards of Saxonburg located at 223 Pittsburgh, Street, Saxonburg, Butler, Butler County, PA 16056
- e. April 2020 - October 2020: UPMC Passavant - McCandless located at 9100 Babcock Blvd, Pittsburgh, Allegheny County PA 15237
- f. October 2020 - April 2021: Concordia at Rebecca Residence located at 3746 Cedar Ridge Road, Allison Park, Allegheny County, PA 15101
- g. April 2021 - February 2022: Guardian Healthcare operating as BelAir Healthcare and Rehabilitation Center located at 100 Little Drive, Lower Burrell, Westmoreland County, PA 15068
- h. March 2022 - May 2022: Woodhaven Care Center located at 2400 McGinley Road, Monroeville, Allegheny County, PA 15146
- i. May 2022 - November 2022: Quality Life Services located at 160 Medical Center Drive, Chloora, Butler County, PA 16025
- j. November 2022 - December 2022: Premier Armstrong Rehabilitation and Nursing Center located at 265 S McKean Street, Kittanning, Armstrong County, PA 16201
- k. January 2023 - May 2023: Sunnyview Rehabilitation and Nursing Center located at 107 Sunnyview Circle, Butler, Butler County, PA 16001

12. Your Affiants know that PRESSDEE was hired as the Assistant Director of Nursing (ADON) at QLSC and was employed at the facility from May 23, 2022 through November 28, 2022, through multiple interviews of employees from QLSC and records reviewed identified her position within the facility. During her time at the facility she was placed as the interim Director of Nursing (DON) and filled both the ADON and DON positions temporarily. The ADON/DON are the facility leads and in charge of all nursing staff, and all administrative tasks that have to be completed to meet all state and federal guidelines. Additionally, they address any patient care concerns, conduct internal investigations, investigate abuse allegations, and handle the scheduling of nurses. The ADON and/or DON will provide direct resident care if needed due to call offs.

13. Your Affiants spoke with PA OAG Nurse Investigator Kelly Baran. Nurse Investigator (NI) Baran is a 2004 Graduate of Reading Hospital School of Nursing, a 2002 Graduate of Penn State



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 3/21/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

2008 to 2016, as a Claims Investigation Agent and a Welfare Fraud Investigator. Through Affiant Fantini's experience with the PA OIG and the PA OAG, Affiant Fantini has testified in criminal court proceedings, analyzed evidence and identified health care fraud, interviewed witnesses, conducted physical surveillance, participated in the execution of search warrants and the collection of evidence of individuals' suspected of health care fraud.

6. Affiant Fantini is empowered by law to conduct criminal investigations and make arrests for various offenses arising out of violations of the Public Welfare Code (Title 62) as well as related violations of the Crimes Code (Title 18) and the Controlled Substance, Drug, Device and Cosmetic Act (Title 35). Affiant Fantini has specialized training and experience in investigating the abuse and/or neglect of care dependent people in nursing homes and other inpatient settings. For example, Affiant Fantini is a lead investigator in a large joint state and federal investigation in which the ownership of several large inpatient facilities have been indicted in United States District Court.

7. The information in this affidavit is intended to show only that there is sufficient probable cause for the requested warrants and does not set forth all of the Affiants' knowledge about this matter. There are multiple Agents on this team and your Affiants are providing information received directly and relaying information received by the investigative team.

8. All victims, witnesses in the affidavit, whose true identifies have been ascertained by proof of positive means, which is known through collective knowledge of the PA OAG Agents have been reviewed and memorialized in reports by your Affiants. The true identities' of these known, but unnamed persons are being withheld for purposes of this Affidavit, both to ensure their safety and to preserve the integrity of this on-going investigation. These individuals are identified by their job title at the facility and/or initials of their first and last names.

9. The subject of this investigation is Heather PRESSDEE. PRESSDEE is described as a white female with a date of birth of August 28, 1982, and a registered address of 2608 Meadow Street, Natrona Heights, PA 15065. PRESSDEE is a Registered Nurse (RN) with an active Pennsylvania Department of State (PA DOS) nursing license registered under RN709423. PRESSDEE has an expired PA DOS registration as a veterinary technician.

10. An allegation was received by the Pennsylvania Office of Attorney General (PA OAG) Medicaid Fraud Control Section from DOS Office of General Counsel (OGC). Additionally, an allegation was received through the Bureau of Narcotics Investigation and Drug Control (BNIDC) through a family member of Decedent J.B. The family member was attempting to identify if the complaint had been referred to the PA OAG as they were unable to effectively negotiate where their allegation had been routed. The allegation from the family member and the PA DOS OGC purported that PRESSDEE was involved in the improper administration of insulin to patients under her care at Quality Life Services Chicora (QLSC), a nursing facility, located at 160 Medical Center Drive, Chicora, Butler County, PA 16025. The improper administration of the insulin is believed to have caused the early deaths of two residents, with a third resident who suffered medication medical complications but was able to survive the administration.

11. Your Affiants identified that since 2018, PRESSDEE has held numerous jobs for short periods of time at various nursing homes and facilities in Western Pennsylvania. Through the Pennsylvania Justice Network (JNET) Labor and Industry Portal (L&I) and numerous interviews of



POLICE CRIMINAL COMPLAINT

Docket Number: CP 723	Date Filed: 5/14/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name	First: HEATHER	Middle: IRENE	Last: PRESSDEE

University where she obtained a Bachelor of Science in Nursing. NI Baran started her career in 2004 at Lancaster General Hospital working on a heart failure unit until 2005. NI Baran then worked at Pottsville Hospital Emergency room full time until 2007 and per diem until 2017. NI Baran worked at a primary care physician's office from 2007-2009 assisting with cardiac stress tests and a protime clinic. In 2017 NI Baran began working at a different primary care office as an office nurse assisting with patient care and educating on test results. From 2020 until her current employment NI Baran was a nurse case manager at Penn State /Health St. Joseph's in Reading. NI did also work in hospice home care for three (3) months in 2020. NI Baran confirmed that insulin is a naturally produced hormone that is made by the pancreas. Insulin helps your body use sugar for energy. In the event your pancreas does not work as it should, by not making or not releasing the insulin your body needs to control your blood sugars, the result is diabetes. Insulin's primary effect is lowering blood sugars. When an individual's blood sugars are too high it is referred to as hyperglycemia. If an individual's blood sugars are too low it is referred to as hypoglycemia. Too much insulin can cause an individual's blood sugar levels to drop, resulting in hypoglycemia. During the process of making insulin your body produces C-peptide. C-peptide and insulin enter the body at the same time and in equal amounts. C-peptide will not affect your blood glucose levels, but it stays in your blood longer than insulin, so it's easy to measure accurately and determine the amount of insulin naturally produced by a patient's pancreas.

14. Your Affiants were provided with the names of three residents who were transported from the QLSC to Butler Memorial Hospital due to hypoglycemia (low blood sugar) immediately following a shift in which PRESSDEE had cared for each of them. QLSC provided timesheets and patient medical records which confirmed the identity of the patients and the shifts worked by PRESSDEE. Your Affiants know that blood sugar ranges are generally above 100 mg/dL. Hypoglycemia is described by the American Diabetes Association as a condition occurring when blood glucose levels fall below 70 mg/dL. Each person responds differently to low blood sugars and symptoms occur in each individual at different glucose levels. Symptoms include but are not limited to, sweating, chills, clammy, irritability, lightheadness, shaky, nausea, confusion, coordination problems, blurred vision, tingling or numbness, and seizures.

15. Two of the residents are now deceased while the third is still living. The first victim is identified as decedent J.B. Decedent J.B. is described as a 55 year old white male. Decedent J.B. passed away at Butler Memorial Hospital on December 04, 2022. Your Affiants reviewed medical records and conducted interviews of QLSC staff and family members. Through this information your Affiants learned that Decedent J.B. was not a diabetic. His cause of death, per his death certificate, is listed as respiratory failure and recurrent febrile illness of unclear origin. The significant conditions contributing to death are: brainstem malignancy, seizure disorder, neurofibromatosis, and hypoglycemia.

16. Per medical records obtained from QLSC and Butler Memorial Hospital (BMH) and reviewed by your Affiants, Decedent J.B. was transferred from QLSC to BMH on two separate occasions due to critically low blood sugar. The first incident occurred on October 16, 2022. In this instance, Decedent J.B. was transferred to the hospital for a urinary tract infection (UTI) and the hospital discovered that he was also hypoglycemic. Upon arriving at the hospital his blood sugar was 24. The decedent was treated and subsequently returned to QLSC. On November 20, 2022, Decedent J.B. was transferred to Butler Memorial Hospital at 1018 hours and was admitted for hypoglycemia, altered

 **POLICE CRIMINAL COMPLAINT**

Docket Number: CR-17-23	Date Filed: 5/14/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

mental state. Prior to being transferred to the hospital, QLSC checked his blood sugar and noted it was low, so they administered glucagon bringing his blood sugar to 24. QLSC then administered glucagon again which brought his blood sugar to 40. A third dose of glucagon was administered and the blood sugar rose to 53. Butler Memorial Hospital reported that at 1137 hours, Decedent J.B.'s glucose level dropped to 17, which was listed as a critical result. The decedent's BMH physicians annotated in his medical files, which were reviewed by your affiants, that based upon laboratory results and clinical experience that they believed the decedent was administered insulin exogenously. Exogenous means the insulin was not created by the body and was given either in error or intentionally. Your Affiants know the decedent was non-verbal and unable to perform an injection upon himself. Laboratory testing taken from the decedent at the BMH ER upon arrival showed he had an insulin level of 69 and a low C-peptide test. The result of the C-Peptide test was <0.10, with a standard range of 0.80 – 3.85 ng/mL. This low reading is indicative that the insulin in the body was not produced by the pancreas or naturally by the body.

17. Your Affiants interviewed Doctor Joshua Hertel, attending physician at Butler Memorial Hospital. Dr. Hertel is a hospitalist with BMH and has been at the facility since 2020. Prior to BMH, he completed his medical training and was an internist at Allegheny Health Network. He stated that as a hospitalist, he admits patients to the hospital, and is their attending physician during their stay. He stated that their primary function is to get the patient stabilized and transferred from the facility for post-acute care. Dr. Hertel was one of the attending physicians for Decedent J.B. for the hypoglycemic incident which occurred on November 20, 2022. Dr. Hertel stated that he began his treatment with Decedent J.B. on November 21, 2022. He stated that at that time he reviewed his medical chart which had indicated that Decedent J.B. had been seen in the ER for hypoglycemia. He stated that his sugar levels were in the 20's which are considered profoundly low. Decedent J.B. was treated with IV Dextrose, a sugar infusion to raise the blood sugars. He stated that there were other medical concerns and Decedent J.B. was referred to infectious disease for a positive UTI. He stated that the decedent presented with multiple comorbidities complicating his care. Dr. Hertel was relieved by another physician, and then resumed care for the decedent on November 29, 2022. He stated that the decedent did not recover and ultimately the family decided to opt for comfort measures with him passing on December 4, 2022.

18. Dr. Hertel stated that in his medical opinion, training and experience, the laboratory results for decedent J.B. were indicative of an exogenous insulin administration. He stated that his insulin level was abnormal, at a level of 69 with a standard range is 0-16. He stated that the decedent's proinsulin level was <4, where a standard range is <18.8. He additionally stated that his C-Peptide level was at <0.1 which a standard range is 0.8-3.85. All the levels Dr. Hertel was referring to were from the ER laboratory draw on November 20, 2022.

19. Daily staffing sheets and electronic medical records from QLSC indicate that PRESSDEE worked through the overnight of November 19, 2022, at 1731 hours to November 20, 2022, at 0636 hours. She was assigned to the medication cart as an RN supervisor and was assigned to provide direct care to the residents on the hall where Decedent J.B. resided. Your Affiants know through their training and experience in conducting investigations into long-term care facilities and interviews conducted of QLSC staff that medication carts are a portable locked cabinet containing both controlled and non-controlled substances. Controlled substances are under a secondary lock within the cabinet.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-17723	Date Filed: 5/24/23	OTN/LiveScan Number	Complain/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

During shift change, the keys to the medication cart are transferred from the departing nurse to the oncoming nurse. The keys to the cart are the only keys that are able to access the cart and are maintained by the nurse passing the medications. Nursing facilities have one nurse, either a Licensed Practical Nurse (LPN) or RN, assigned to conduct the medication passes and provide direct resident care on specified halls and/or wings depending on the facility layout. Certified Nursing Assistants (CNAs) are additionally assigned to the halls to care for the residents and do bathing, assisting them to the restroom, and other non-medical tasks. Upon administration of medication by the on-shift nurse, the administration of medications is to be documented into the patient's electronic medical record (eMAR). Additional information entered into the eMAR are any progress notes to include, but are not limited to, patient status, significant medical events, order changes for treatment and/or medications.

20. Your Affiants know through interviews and records reviewed from QLSC that shift change was conducted at approximately 0600 hours on November 20, 2022. Approximately 2.5-hours later, a CNA identified that decedent J.B. was lethargic and diaphoretic. Diaphoretic is a medical term for "clammy" and/or "sweaty" skin. She contacted the RN on duty who took the decedent's blood sugar readings. The first reading indicated "LOW" meaning it was too low to be measured by the testing device. Following the administration of three doses of glucagon, an emergency medication utilized to raise blood sugars, the third reading indicated a blood glucose level of 53 mg/dL. Decedent J.B. was transferred to the hospital and admitted. The physicians at Butler Memorial Hospital were never able to remove decedent J.B. from a dextrose drip, another medication to stabilize blood sugars. On December 03, 2022, the family decided to end life sustaining care and, as stated above, decedent passed away on December 04, 2022.

21. The second resident identified is Decedent J.C. Decedent J.C. is described as an 83 year old white male. Decedent J.C. was a long-term resident of QLSC. On November 19, 2022, Decedent J.C. and Decedent J.B. were "suite mates". Their rooms were connected via a "Jack and Jill" bathroom. According to QLSC medical records and interviews, decedent J.C. was identified as being a non-insulin dependent diabetic. PRESSDEE worked through the overnight of November 19, 2022, at 1731 hours to November 20, 2022, at 0636 hours. On November 20, 2022, at approximately 0730 hours it was identified that Decedent J.C. was lethargic and diaphoretic. The RN on duty took his blood sugar readings prior to 0737 hours, which indicated he had a blood glucose level of 29 mg/dL. He was administered one injection of glucagon at approximately 0737 hours, which raised his blood sugar to 71. He was given an additional dose of glucagon and his blood sugar reading was 63. A third injection of glucagon was administered prior to 0825 hours and his blood sugar was 61. Unable to raise and maintain decedent J.C.'s glucose levels, he was transported to Butler Memorial Hospital at 1035 hours, within 10 minutes of Decedent J.B. Decedent J.C. was already on hospice at QLSC and the family opted to have him transferred back to the facility where he passed on December 25, 2022. Your Affiants know that Decedent J.C. was physically unable to self-administer insulin. His cause of death, per his death certificate, is listed as respiratory arrest, end stage dementia, chronic kidney disease, and heart disease.

22. Your Affiants interviewed the Certified Registered Nurse Practitioner (CRNP) Sandra Carroll at QLSC who stated that both Decedent J.B. and Decedent J.C. were sent to the hospital for the same condition, hypoglycemia, within 30 minutes of one another. In her career, which encompasses over thirty years of nursing experience, she has never seen this occur. The CRNP found it to be very



POLICE CRIMINAL COMPLAINT

Docket Number: CR77-23	Date Filed: 5/24/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name	First: HEATHER	Middle: IRENE	Last: PRESSDEE

unusual, particularly because the decedents were only separated by a shared bathroom on the same wing of the facility. CRNP Carroll stated that following notification of potential exogenous insulin, she and the Medical Director of the facility conducted medical research into the insulin onset times. She stated that humulin-R is a rapid acting insulin and is generally given to diabetics' right before meals and at bedtime with a snack. Humulin-R insulin begins to work at 0.5 hours - 1 hour and peaks at 5 - 10 hours. For a humulin-N, which is given routinely if they are a diabetic, the onset is 1 - 1.5 hours and the peak is 4 - 6 hours. Humulin-N lasts in the system for 24 hours. She stated that based upon her calculations, if the decedents were given insulin at some time during the night, she feels that the affects would be seen within the timeframe that Decedent J.B and Decedent J.C. both began to have their hypoglycemic events. CRNP Carroll had a conversation with PRESSDEE regarding Decedent J.B. prior to his passing in which PRESSDEE stated that Decedent J.B. would be "better off dead." CRNP Carroll stated that while his quality of life wasn't the best, all medical personnel took an oath to "do no harm" and that it wasn't up to them when people passed, it was their choice to ensure quality life while they were alive.

23. The third victim is identified as Victim E.A. Victim E.A. is described as a 73 year old white male. Your Affiants reviewed E.A.'s medical notes from QLSC and conducted interviews of family members and Victim E.A. Your Affiants know that he is a non-diabetic. A review of the medical records identified that PRESSDEE provided direct care to Victim E.A. Your Affiants reviewed the timecard punches for PRESSDEE on August 31, 2022. PRESSDEE was assigned from 0550 hours - 2131 hours as an RN Supervisor. PRESSDEE was assigned to work the medication cart and provide direct resident care to the wing where Victim E.A. resided. PRESSDEE's notes indicated that she last administered medications to the victim at approximately 2056 hours. PRESSDEE left the facility shortly thereafter. The victim was found seizing in his bed at approximately 2313 hours on August 31, 2022. Victim E.A. has no known history of seizures and your affiants know that seizures are an indicator of severe hypoglycemia. The RN on duty collected a blood sample, which identified his blood glucose was at 73 mg/dL. He was immediately transferred to Butler Memorial Hospital where it was noted his blood glucose had dropped to 11 mg/dL within an hour timespan. The hospital called QLSC and asked the nurse on duty if Victim E.A. had been provided insulin due to levels in his system. Victim E.A. had an insulin level of 178 and a C-Peptide level of 1.50 with an acceptable range of 0.80 - 3.85 ng/mL, which is within normal limits for laboratory testing. The telephone call from the hospital was noted in Victim E.A. progress notes in his eMAR and was reported to PRESSDEE. Despite being the ADON and Interim DON at the time, PRESSDEE took no further action to investigate the allegation of improper or accidental insulin administration. Victim E.A. was admitted to Butler Memorial Hospital where his blood sugar was stabilized and he was transferred to another facility eight (8) days after the suspected administration. Your Affiants know Victim E.A. to be mentally aware, but physically he would be unable to perform a self-administration of insulin.

24. Your Affiants interviewed RN T.S. who came on duty on that wing after PRESSDEE on August 31, 2022. The RN stated that PRESSDEE reported that Victim E.A. was congested and lethargic. At approximately 2130 hours, the RN saw PRESSDEE still in the facility and asked her why she was still there. PRESSDEE indicated that she still had things that she needed to do. The RN instructed PRESSDEE to leave, stating that she could handle things and PRESSDEE insisted on staying, indicating "no". The RN then observed PRESSDEE walk down the hall where Victim E.A. resided. When the RN responded to Victim E.A.'s room when he was suffering this medical emergency,



POLICE CRIMINAL COMPLAINT

Docket Number: CR-17723	Date Filed: 5/04/23	OTN/Case Number	Complaint/Incident Number MF1220278114N
Defendant Name	First: HEATHER	Middle: IRENE	Last: PRESSDEE

The RN observed a box of lancets, which are used to check blood sugar, on a bedside table in the room. The RN noted it was odd as neither Victim E.A. nor his roommate at the time, Decedent J.B., were diabetic. In addition, the RN stated that it is odd to see a box of lancets in a resident's room. Typically, a single lancet would be taken in. Boxes of lancets are stored in the storage room. There is a container area in the top of the med carts where lancets are usually kept.

25. Your Affiants interviewed Dr. Angela Rhoades, attending physician at BMH. Dr. Rhoades is a board certified physician in general internal medicine. She stated that she has been an attending for approximately 13 years. She stated that she was the ICU admitting physician on August 31 – September 1, 2022, the night of Victim E.A. admission for hypoglycemia. She stated that in her professional medical opinion, with the treatment and laboratory testing that she conducted on Victim E.A., that he was injected with insulin. She stated that she believes the seizures Victim E.A. had at the nursing facility were caused by the sugar crash. She stated that his blood sugar level of 11 was profoundly low. She stated that he received five (5) amps of D-50, which is a significant amount of sugar infusion and was probably the entire stock of D-50 in the ER. She stated that the laboratory results for Victim E.A. showed an elevated level of insulin along with a low C-Peptide result.

26. On May 24, 2023, your Affiants and one (1) additional PA OAG Agents went to the residence of Heather PRESSDEE at 2608 S. Meadow Street, Natrona Heights, PA, to interview PRESSDEE and conduct a search of the residence. Your Affiants knocked on the residence door at approximately 0920 hours. Her father answered the door, and Agents identified themselves and asked if PRESSDEE was home. Her father went back upstairs and PRESSDEE came down to the door and your Affiants identified themselves and informed her that we were there to speak with her in regards to allegations that we had received pertaining to some facilities where she previously worked. Affiant McElhanev verbally read PRESSDEE her Miranda Rights and Warnings at approximately 0925 in the presence of Affiant Fantini. PRESSDEE stated that she understood and she would continue to speak with your Affiants. Your Affiants requested consent to search her residence, vehicles and cellular devices which she did sign consent forms for the residence, two vehicles, and her cellular device.

27. PRESSDEE stated that she went to the Community College of Allegheny County (CCAC) for nursing originally and did not finish her degree. Instead, she went to be a veterinary technician and worked at Pittsburgh Veterinary Specialty and Emergency Center (PVSEC) where she worked for 14 years. She stated that she worked there for critical animal care, anesthesia, and euthanasia. She did return to school and finished her degree to be a registered nurse (RN). She stated that she went to CCAC for that and that she is also pursuing her masters in nursing. After completing her degree at CCA, she started working at various facilities. Within two (2) years of obtaining her RN degree she became an ADON at QLSC. She stated that while she was there she became the interim DON and that there was a lot to take on. She stated that she had to fill in during call-offs and that she had to do all the administrative duties as well.

28. Your Affiants went through a background of her duties whenever she would work the floor at QLSC. She stated that there is one set of keys per medication cart, and those are the only keys that can open the medication cart. Affiant Fantini asked PRESSDEE about decedent J.C. PRESSDEE stated that decedent J.C. was a "brittle diabetic" and that he was a difficult patient. She stated that he was on hospice and that the hospice nurses came into the facility once a week. Your Affiants asked how his blood sugar was maintained and she stated that he had highs and lows. Your Affiants asked if



POLICE CRIMINAL COMPLAINT

Docket Number: CR-177-23	Date Filed: 5/24/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

she was working the night that he had a blood sugar crash, to which she stated that she was working the night shift. She stated that the night shift at QLSC was 2300-0700. She stated that she couldn't remember what occurred that night; however, he was very quiet which wasn't normal for him. She stated that he was immobile.

29. Your Affiants asked about decedent J.B. PRESSDEE stated that he had a lot of medical conditions and that he had "contractures" which made him unable to move. She stated that he was non-verbal and immobile. She stated that he had some blood sugar issues, and that he went to the hospital and she made numerous calls and that the hospital told her that decedent J.B. had an opposite reaction to antibiotics. She stated that instead of his sugars going high, they told her his sugars dropped low causing him to have a hypoglycemic incident. She stated that she was working the night shift for decedent J.B. and that eventually he succumbed to his comorbidities at the hospital.

30. Your Affiants asked about victim E.A. PRESSDEE stated she could not remember him even after providing a description of the victim.

31. Affiant Fantini informed PRESSDEE that we had reviewed the medical records and had medical opinions rendering that the hypoglycemia events were caused by exogenous insulin. Your Affiants explained that we knew that she had provided care immediately before the hypoglycemic events. PRESSDEE did then state that she provided insulin to decedent J.B. and decedent J.C. at approximately 0000 hours for decedent J.B. and 0030 hours for decedent J.C. She stated that she felt bad for their quality of life and she had hoped that they would just slip into a coma and pass away. Your Affiants then escorted her into her residence to retrieve her cell phone. While inside, PRESSDEE spoke to her mother, where she informed her that she gave patients insulin that didn't need it. Her mom asked if they died, and PRESSDEE stated yes and wasn't able to answer why she did it to her mother's question. Your Affiants escorted to her room and PRESSDEE turned over her cell phone to Affiant McElhaney. You Affiants then asked PRESSDEE if she would be comfortable going to an interview van, which she agreed to do and your Affiants escorted PRESSDEE to a van where she was then again Mirandized and the interview continued on audio and video. During the interview, her mother was brought down to speak with PRESSDEE. During the interview, PRESSDEE stated in essence the following.

32. For Victim E.A. PRESSDEE said that he was in COVID isolation and that he was having a very difficult time. She stated that it was an extremely busy night and that he asked her to "kill him." PRESSDEE stated that at approximately 0300 hours, she removed insulin from the medication cart, and injected him in the stomach with one (1) syringe, approximately 100 units, of long-acting insulin. She stated that he began showing symptoms and that she did not address the symptoms, and the oncoming shift sent him to the hospital.

33. For Decedent J.B. she stated that she felt bad and his quality of life was not good. She stated that he was moaning in pain and at approximately 0000 hours, she removed 60 units of short-acting insulin from the medication cart and injected him in his shoulder with that insulin and his morphine injection.

34. For Decedent J.C. she stated that she again felt bad for him and that his quality of life was not good. She stated that he was very quiet that night and that approximately 0030 hours she removed 60 units of short-acting insulin from the medication cart and injected him in his stomach.



POLICE CRIMINAL COMPLAINT

Docket Number: CR177-23	Date Filed: 5/14/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

35. Based upon the aforementioned information as described above, your Affiants believe there is enough probable cause for the court to issue an arrest warrant for Heather Irene PRESSDEE.

I, STEPHANIE L. MCELHANEY/KAYLA FANTINI, 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Stephanie L. McElhane/Kayla Fantini
(Signature of Affiant)

Sworn to me and subscribed before me this 24 day of 5 23
Date [Signature] SP, Magisterial District Judge

My commission expires first Monday of January, 2024

