

AGENT

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2008-APR-9 PM 2:31
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2008 Grand Jury

08-00430

11 UNITED STATES OF AMERICA,)
12 Plaintiff,)
13 v.)
14 LAWANDA JACKSON,)
15 Defendant.)

CR 08-)
I N D I C T M E N T)
[42 U.S.C. § 1320d-6(a)(2),)
b(3): Wrongful Obtaining of)
Individually Identifiable)
Health Information for)
Commercial Advantage; 18 U.S.C.)
§ 2(b): Causing an Act to be)
Done]

[FILED UNDER SEAL]

The Grand Jury charges:

At all times relevant to this Indictment:

INTRODUCTORY ALLEGATIONS

1. UCLA Health System was comprised of the following
medical facilities: UCLA Medical Center, Santa Monica-UCLA
Medical Center and Orthopaedic Hospital, Resnick
Neuropsychiatric Hospital at UCLA, Mattel Children's Hospital
UCLA, and the UCLA Medical Group. The individuals working at
these various medical facilities were employed by UCLA
Healthcare. Both UCLA Healthcare and UCLA Health System were

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1 health care providers located within the Central District of
2 California.

3 2. Defendant LAWANDA JACKSON ("defendant JACKSON") was an
4 Administrative Specialist employed by UCLA Healthcare and
5 working at one of UCLA Health System's medical facilities.

6 3. As an Administrative Specialist with UCLA Healthcare,
7 defendant JACKSON had access to individually identifiable health
8 information for patients who visited certain UCLA Health System
9 medical facilities.

10 4. Beginning in or about 2006 and continuing through at
11 least May 21, 2007, defendant JACKSON had an agreement with a
12 national media outlet whereby, in exchange for obtaining
13 individually identifiable health information for celebrity
14 patients who visited UCLA Health System medical facilities and
15 then disclosing that information to the national media outlet,
16 defendant received at least \$4,600 in the form of checks written
17 by the national media outlet payable to her husband.

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COUNT ONE

[42 U.S.C. § 1320d-6(a)(2), (b)(3); 18 U.S.C. § 2(b)]

5. The Grand Jury incorporates by reference and re-alleges Paragraphs 1 through 4 above, as though set forth in their entirety here.

6. On or about May 21, 2007, in Los Angeles County, within the Central District of California, defendant JACKSON, then an employee of a health care provider, knowingly and for a reason other than permitted by Title 42, United States Code, Chapter 7, Subchapter XI, Part C, obtained and caused to be obtained individually identifiable health information relating to an individual, with the intent to sell, transfer, and use said information for commercial advantage, personal gain, and malicious harm.

A TRUE BILL

/s/

Foreperson

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