

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 PRESSDEE  
First Name Middle Name Last Name Gen  
2608 S. MEADOW STREET  
NATRONA HEIGHTS, PA 15065

**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 CP-10-CR-1395-2023	Date Filed 11/21/23	OTN/LiveScan Number K 1000897-2	Complaint/Incident Number MEI220278114N-2	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 Heather	Middle Name Irene	Last Name Pressdee	Gen.	
RACE <input 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"/> 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)			
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <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).

JEFFREY BAXTER  
(Name of the attorney for the Commonwealth)

[Signature]  
(Signature of the attorney for the Commonwealth)

11/21/2023  
 COURT OF COMMONWEALTHS  
 CLERK OF COURTS  
 ENTERED AND FILED  
 DEMO - 2 11 5:45

I, SA K. FANTINI / NA S. MCELHANEY BADGE NUMBER 578 / 645  
(Name of the Affiant) (PSP/MP/OTC - 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 nickname 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] Qlsc And Other Facilities As Identified In The Aopc (Subdivision Code) (Place-Political Subdivision)

in BUTLER County [10] on or about DECEMBER 16, 2020 THROUGH MAY 01, 2023  
(County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/02/2023	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 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 <b>1</b>					
Lead?	<input type="checkbox"/> 1	2502	A	of the	TITLE 18	1	F1		
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): <b>CRIMINAL ATTEMPT HOMICIDE</b>			
Acts of the accused associated with this Offense: On or about December 16, 2020 to December 17, 2020, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of R.E. by administering medication (insulin) to R.E., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.									

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 <b>1</b>					
Lead?	<input type="checkbox"/> 2	2713	(a)(1)	of the	TITLE 18	1	F1		
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): <b>NEGLECT OF A CARE-DEPENDENT PERSON</b>			
Acts of the accused associated with this Offense: On or about December 16, 2020 to December 17, 2020, the defendant, Heather Pressdee, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, R.E., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (Insulin) to R.E. without medical justification.									

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 <b>0</b>					
Lead?	<input type="checkbox"/> 3	2502	A	of the	TITLE 18	1	F1		
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): <b>CRIMINAL ATTEMPT HOMICIDE</b>			
Acts of the accused associated with this Offense: On or about August 8, 2021 to August 9, 2021, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of S.S. by administering medication (insulin) to S.S., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/16/21	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 0				
Lead?	Offense# 4	Section 2713	Subsection (A)(1)	PA Statute (Title) of the TITLE 18	Counts 1	Grade F1	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: On or about August 8, 2021 to August 9, 2021, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, S.S., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) to S.S. without medical justification.								

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				
Lead?	Offense# 5	Section 2502	Subsection A	PA Statute (Title) of the TITLE 18	Counts 1	Grade F1	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: On or about September 28, 2021, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of M.B., by administering medication (Insulin) to M.B., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

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				
Lead?	Offense# 6	Section 2713	Subsection (A)(1)	PA Statute (Title) of the TITLE 18	Counts 1	Grade F1	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: On or about September 28, 2021, the defendant, Heather Pressdee, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, M.B., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) to M.B., without medical justification.								

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 JUDGE OF COMMON PLEAS



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/16/2023	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 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				
Lead?	7	2502	A	of the TITLE 18	1	F1		
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: On or about November 15, 2021 to November 16, 2021, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of J.R., by administering medication (Insulin) to J.R., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

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				
Lead?	8	2713	(A)(1)	of the TITLE 18	1	F1		
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: On or about November 15, 2021 to November 16, 2021, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, J.R., by failing to provide treatment, care, goods or services necessary to preserve his health when she administered medication (insulin) to J.R., without medical justification.								

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				
Lead?	9	2502	A	of the TITLE 18	1	F1		
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: On or about December 27, 2021 to December 28, 2021, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of M.C., by administering medication (insulin) to M.C., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

LISA WELLS AND JEFFREY B. COOK OF COURTESY AND FILED  
 NOV - 2 11 2023  
 BUTLER COUNTY PA  
 CLERK OF COURTS



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/12/2023	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.)

<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 1					
<input type="checkbox"/> Lead?	10	2713	(A)(1)	of the TITLE 18	1	F1			
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: On or about December 27, 2021 to December 28, 2021, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, M.C., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (Insulin) to M.C., without medical justification.									

<input type="checkbox"/> 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"/> Lead?	11	2502	A	of the TITLE 18	1	F1			
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: On or about February 23, 2022 to February 24, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of N.H., by administering medication (insulin) to N.H., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.									

<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 1					
<input type="checkbox"/> Lead?	12	2713	(A)(1)	of the TITLE 18	1	F1			
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: On or about February 23, 2022 to February 24, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, N.H., by failing to provide treatment, care, goods, or services necessary to preserve his health when she administered medication (insulin) to N.H., without medical justification.									

LISA WELLS  
 CLERK OF COURTS  
 ENTERED AND FILED  
 2023 NOV - 2  
 BUTLER COUNTY  
 COURT OF COMMON PLEAS



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/16/2023	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 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"/> Lead?	13	2502	A	of the TITLE 18	1	F1		
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: On or about June 16, 2022 to June 25, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of B.S., by administering medication (insulin) to B.S., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

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"/> Lead?	14	2713	(A)(1)	of the TITLE 18	1	F1		
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: On or about June 16, 2022 to June 25, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, B.S., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) to B.S., without medical justification.								

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"/> Lead?	15	2502	A	of the TITLE 18	1	F1		
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: On or about August 6, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of J.F., by administering medication (Insulin) to J.F., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

USA, WELLS FARGO BANK OF AMERICA, N.A. FILED IN 2023-11-16 PM 2:15:45  
 MIDDLEBURY, OHIO  
 CLERK OF COURT  
 POLICE CRIMINAL COMPLAINT



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/16/21/2023	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.)

<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 1					
<input type="checkbox"/> Lead?	16	2713	(A)(1)	of the	TITLE 18	1	F1		
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: On or about August 6, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, J.F., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered Insulin to J.F., without medical justification.									

<input type="checkbox"/> 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 0					
<input type="checkbox"/> Lead?	17	2502	A	of the	TITLE 18	1	F1		
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: On or about October 7, 2022 to October 9, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of C.K., by administering medication (Insulin) to C.K., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.									

<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 0					
<input type="checkbox"/> Lead?	18	2713	(A)(1)	of the	TITLE 18	1	F1		
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: On or about October 7, 2022 - October 9, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, C.K., by failing to provide treatment, care, goods, or services necessary to preserve his health when she administered medication (Insulin) to C.K., without medical justification.									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/02/2023	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 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"/> Lead?	19	2502	A	of the TITLE 18	1	F1		
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: On or about November 5, 2022 to November 6, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of B.M., by administering medication (insulin) to B.M., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

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"/> Lead?	20	2713	(A)(1)	of the TITLE 18	1	F1		
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: On or about November 5, 2022 to November 6, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, B.M., by failing to provide treatment, care, goods, or services necessary to preserve his health when she administered medication (insulin) to B.M., without medical justification.								

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"/> Lead?	21	2502	A	of the TITLE 18	1	F1		
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: On or about November 9, 2022 to November 23, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of B.H., by administering medication (insulin) to B.H., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

USA VERLINDA L. STOLT  
 CLERK OF COURTS  
 ENTERED AND FILED  
 2023 NOV 12  
 10:45  
 COURT OF COMMON PLEAS





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/16/21 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.)

<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 1
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<input type="checkbox"/> Lead?	22	2713	(A)(1)	of the	TITLE 18	1	F1		
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
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Statute Description (include the name of statute or ordinance): NEGLECT OF A CARE-DEPENDENT PERSON

Acts of the accused associated with this Offense: On or about November 9, 2022 to November 23, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, B.H., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) to B.H., without medical justification.

<input type="checkbox"/> 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
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<input type="checkbox"/> Lead?	23	2502	A	of the	TITLE 18	1	F1		
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
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Statute Description (include the name of statute or ordinance): CRIMINAL ATTEMPT HOMICIDE

Acts of the accused associated with this Offense: On or about December 10, 2022 to December 18, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of L.S., by administering medication (insulin) to L.S., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.

<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 1
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<input type="checkbox"/> Lead?	24	2713	(A)(1)	of the	TITLE 18	1	F1		
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
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Statute Description (include the name of statute or ordinance): NEGLECT OF A CARE-DEPENDENT PERSON

Acts of the accused associated with this Offense: On or about December 10, 2022 to December 18, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, L.S., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) to L.S., without medical justification.

BUTLER COUNTY  
 COURT OF COMMON PLEAS  
 2023 NOV - 2  
 ENTERED  
 CLERK OF COURTS  
 LISA WELLS  
 15



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <b>11/02/2023</b>	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.)

<input checked="" type="checkbox"/> Inchoate Offense 18 901 A	<input type="checkbox"/> Attempt 18 902 A	<input type="checkbox"/> Solicitation 18 903	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>1</b>				
<input type="checkbox"/> 25	2502	A	of the TITLE 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	PennDOT Data (if applicable) Accident Number					
Statute Description (include the name of statute or ordinance): CRIMINAL ATTEMPT HOMICIDE								
Acts of the accused associated with this Offense: On or about December 15, 2022 to December 27, 2022, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of A.S., by administering medication (insulin) to A.S., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

<input type="checkbox"/> Inchoate Offense 18 901 A	<input type="checkbox"/> Attempt 18 902 A	<input type="checkbox"/> Solicitation 18 903	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>1</b>				
<input type="checkbox"/> 26	2713	(A)(1)	of the TITLE 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	PennDOT Data (if applicable) Accident Number					
Statute Description (include the name of statute or ordinance): NEGLECT OF A CARE-DEPENDENT PERSON								
Acts of the accused associated with this Offense: On or about December 15, 2022 to December 27, 2022, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, A.S., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) to A.S., without medical justification.								

<input type="checkbox"/> Inchoate Offense 18 901 A	<input checked="" type="checkbox"/> Attempt 18 902 A	<input type="checkbox"/> Solicitation 18 903	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>1</b>				
<input type="checkbox"/> 27	2502	A	of the TITLE 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	PennDOT Data (if applicable) Accident Number					
Statute Description (include the name of statute or ordinance): CRIMINAL ATTEMPT HOMICIDE								
Acts of the accused associated with this Offense: On or about January 20, 2023 to January 21, 2023, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of M.L., by administering medication (insulin) to M.L., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

USA V. HEATHER PRESSDEE  
 CLERK OF COURTS  
 ENTERED AND FILED  
 11/02/2023  
 MFI220278114N  
 CRIMINAL COMPLAINT



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/02/2023	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.)

<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 1				
<input type="checkbox"/> Lead?	28	2713	(A)(1)	of the TITLE 18	1	F1		
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: On or about January 20, 2023 to January 21, 2023, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, M.L., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (Insulin) to M.L., without medical justification.								

<input type="checkbox"/> 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"/> Lead?	29	2502	A	of the TITLE 18	1	F1		
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: On or about March 20, 2023 to March 21, 2023, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of A.V., by administering medication (insulin) to A.V., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

COURT FILED  
 2023 MAR 21 PM 8:45  
 CLERK OF COURT  
 USA DISTRICT COURT  
 EASTERN DISTRICT OF PENNSYLVANIA

<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 1				
<input type="checkbox"/> Lead?	30	2713	(A)(1)	of the TITLE 18	1	F1		
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: On or about March 20, 2023 to March 21, 2023, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, A.V., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) to A.V., without medical justification.								



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/10/21 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 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"/> 31	2502	A	of the 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): CRIMINAL ATTEMPT HOMICIDE								
Acts of the accused associated with this Offense: On or about March 24, 2023, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of I.S., by administering medication (Insullin) to I.S., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

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"/> 32	2713	(A)(1)	of the 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): NEGLIGENCE OF A CARE-DEPENDENT PERSON								
Acts of the accused associated with this Offense: On or about March 24, 2023, the defendant, Heather Pressdee, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, I.S., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (Insullin) to I.S., without medical justification.								

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"/> 33	2502		of the TITLE 18	1	H1			
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): MURDER								
Acts of the accused associated with this Offense: On or about March 24, 2023 to March 25, 2023, the defendant, Heather Pressdee, did intentionally, knowingly, recklessly, and/or negligently cause the death of another human being, G.S., with the specific intent to kill. TO WIT: The defendant did knowingly and intentionally administer medication (insulin) and an air embolism to G.S., a care-dependent resident at Sunnyvale Rehabilitation and Nursing Center, with the intent to kill him and which ultimately caused his death.								

USA WELAND LOTZ  
 CLERK OF COURTS  
 ENTERED AND FILED  
 2023 NOV - 2  
 4:55 PM  
 COUNTY OF CAMBERG  
 PUT IN COURT FILE



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/10/21 2/23	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.)

<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 1				
<input type="checkbox"/> 34	2713	(A)(1)	of the 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: On or about March 24, 2023 to March 25, 2023, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, G.S., by failing to provide treatment, care, goods, or services necessary to preserve his health when she administered insulin and an air embolism to G.S., without medical justification.								

<input type="checkbox"/> 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"/> 35	2502	A	of the 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): CRIMINAL ATTEMPT HOMICIDE								
Acts of the accused associated with this Offense: On or about April 17, 2023, the defendant, Heather Pressdee, did commit an attempt when, with the intent to cause the crime of 18 Pa.C.S. 2502(a) Murder of the First Degree, the defendant committed an act which constituted a substantial step toward the commission of the crime. TO WIT: The defendant, with the specific intent to kill, did take a substantial step towards causing the death of S.L., by administering medication (insulin) and an air embolism to S.L., without medical justification, causing the victim to be placed at risk of death and causing serious bodily injury.								

<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 1				
<input type="checkbox"/> 36	2713	(A)(1)	of the 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: On or about April 17, 2023, the defendant, while acting as a caretaker, did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, S.L., by failing to provide treatment, care, goods, or services necessary to preserve her health when she administered medication (insulin) and an air embolism to S.L., without medical justification								

SA WELDON DOTE  
 ALERK OF OFFERS  
 INTERED A  
 BUTLER COUNTY  
 DEPT OF CORRECTIONS  
 2023 NOV - 2  
 4:45



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/10/21/2023	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.)

<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 0				
<input type="checkbox"/> 37	2502		of the TITLE 18	1	H1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	PennDOT Data (if applicable) Accident Number					
Statute Description (include the name of statute or ordinance): MURDER								
Acts of the accused associated with this Offense: On or about April 30, 2023 to May 1, 2023, the defendant, Heather Pressdee, did intentionally, knowingly, recklessly, and/or negligently cause the death of another human being, N.C., with the specific intent to kill. TO WIT: The defendant did knowingly and intentionally administer medication (insulin) to N.C., a care-dependent resident at Sunnyview Rehabilitation and Nursing Center, with the intent to kill him and which ultimately caused his death.								

<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 0				
<input type="checkbox"/> 38	2713	(A)(1)	of the TITLE 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	PennDOT Data (if applicable) Accident Number					
Statute Description (include the name of statute or ordinance): NEGLECT OF A CARE-DEPENDENT PERSON								
Acts of the accused associated with this Offense: On or about April 30, 2023 to May 1, 2023, the defendant, while acting as a caretaker did intentionally, knowingly or recklessly cause serious bodily injury and/or death by failing to provide treatment, care, goods, or services necessary to preserve the health, safety or welfare of a care-dependent person for whom she was responsible to provide care. TO WIT: The defendant did intentionally, knowingly or recklessly cause serious bodily injury and/or death to a care-dependent person, N.C., by failing to provide treatment, care, goods, or services necessary to preserve his health when she administered medication (insulin) to N.C., without medical justification.								

<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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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	PennDOT Data (if applicable) Accident Number					
Statute Description (include the name of statute or ordinance):								
Acts of the accused associated with this Offense:								

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/02/2023	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
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 15
- 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.)**

11/2/2023  
 (Date)

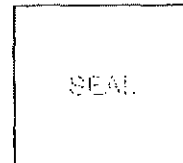
*K. Santoni # 978 / [Signature] #1045*  
 (Signature of Affiant)

AND NOW, on this date November 2, 2023 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.

50th District  
 (Magisterial District Court Number)

Maura Palumbo  
 (Issuing Authority)



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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

## AFFIDAVIT of PROBABLE CAUSE

1. Your Affiant is Kayla Fantini. Affiant Fantini is a Special Agent II with the Pennsylvania Office of Attorney General (PA OAG), Medicaid Fraud Control Section, Neglect of a Care-Dependent Person Team, 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 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.

2. 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.

3. 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.

4. Affiant McElhaney has conducted investigations involving the prescribing practices of providers in the medical community including doctors, nurses and other health care professionals. Affiant McElhaney has attended Drug Diversion training provided by the National Association of Drug Diversion Investigators and training provided by the Pennsylvania Office of Attorney General. Affiant McElhaney additionally has completed training within the Pennsylvania Medical Society on prescribing practices, pain management prescribing, and opiate prescribing. Affiant McElhaney 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, Affiant McElhaney has experience in investigating violations of the Drug Act and the Crimes Code.

5. As an Agent of the Pennsylvania Office of Attorney General, Affiant McElhaney 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.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

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# POLICE CRIMINAL COMPLAINT

<b>Docket Number:</b>	<b>Date Filed:</b> 11/12/23	<b>OTN/LiveScan Number</b>	<b>Complaint/Incident Number</b> MFI220278114N
<b>Defendant Name:</b>	<b>First:</b> HEATHER	<b>Middle:</b> IRENE	<b>Last:</b> PRESSDEE

(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.

6. As an Agent of the Pennsylvania Office of Attorney General, Affiant McElhaney 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.

7. The information in this Affidavit is intended to show only that there is sufficient probable cause for the charges detailed herein and does not set forth all of the Affiants' knowledge about this matter. There are multiple Agents on this investigative team. Your Affiants are providing information that was received directly as well as information that was relayed from members of the investigative team.

8. The true identities of all victims and witnesses detailed in this Affidavit have been memorialized in reports authored by the investigative team. The true identities of these known, but unnamed persons, are being withheld to ensure their safety, to comply with confidentiality provisions, and to preserve the integrity of this on-going investigation. These individuals are identified by their job title at the facility and/or the 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 was a Registered Nurse (RN) with Pennsylvania Department of State (PA DOS) nursing license registered under RN709423. That nursing license was issued on July 31, 2018 and suspended as of July 26, 2023. PRESSDEE also 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 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. According to the initial referrals, the improper administration of insulin was believed to have caused the early deaths of two residents. A third resident suffered a medical emergency, but allegedly survived the administration.

11. Your Affiants determined 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 (L&I) Portal and interviews of administrative staff and peers, Your Affiants have identified that since 2018 PRESSDEE has been employed at the facilities listed below. Your Affiants have identified a pattern of PRESSDEE being investigated for abusive behavior towards patients and/or staff at each facility resulting in PRESSDEE then resigning or being terminated.

- a. October 2018 - April 2019: Encompass Health Rehabilitation Hospital of Harmarville - 320 Guys Run Road, Pittsburgh, Allegheny County, PA 15238

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/18/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

- b. April 2019 - September 2019: Allegheny Valley Hospital- 1301 Carlisle Street, Natrona Heights, Allegheny County, PA, 15065
- c. September 2019 - January 2020: Platinum Ridge Center for Rehabilitation & Healing - 1050 Broadview Blvd, Brackenridge, Allegheny County, PA 15014
- d. February 2020 - April 2020: Orchards of Saxonburg - 223 Pittsburgh, Street, Saxonburg, Butler, Butler County, PA 16056
- e. April 2020 - October 2020: UPMC Passavant – McCandless – 9100 Babcock Blvd, Pittsburgh, Allegheny County PA 15237
- f. October 2020 - April 2021: Concordia at Rebecca Residence - 3746 Cedar Ridge Road, Allison Park, Allegheny County, PA 15101
- g. April 2021 - February 2022: Guardian Healthcare operating as BelAir Healthcare and Rehabilitation Center – 100 Little Drive, Lower Burrell, Westmoreland County, PA 15068
- h. March 2022 - May 2022: Woodhaven Care Center – 2400 McGinley Road, Monroeville, Allegheny County, PA 15146
- i. May 2022 - November 2022: Quality Life Services – 161 Medical Center Drive, Chicora, Butler County, PA 16025
- j. November 2022 - December 2022: Premier Armstrong Rehabilitation and Nursing Center - 265 S McKean Street, Kittanning, Armstrong County, PA 16201
- k. January 2023 - May 2023: Sunnyview Rehabilitation and Nursing Center - 107 Sunnyview Circle, Butler, Butler County, PA 16001
- l. May 2023: Cheswick Rehabilitation and Wellness Center - 3876 Saxonburg Boulevard, Cheswick, Allegheny County, PA 15024

12. Affiant Fantini spoke with PA OAG Nurse Investigator Kelly Baran. Nurse Investigator (NI) Baran is a 2004 Graduate of Reading Hospital School of Nursing, a 2020 Graduate of Penn State University where she obtained a Bachelor of Science in Nursing. NI Baran has been a Registered Nurse (RN) since 2004 when she started her career 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 Baran also worked in hospice home care for three months in 2020.

13. 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.

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
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14. 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 can include, but are not limited to, fever, sweating, chills, clamminess, irritability, light headedness, shakiness, nausea, confusion, coordination problems, blurred vision, tingling, numbness, and seizures.

15. Certified Registered Nurse Practitioner (CRNP) S.C., an employee of Quality Life Services Chicora (QLSC), advised Agents of the peak times and onset times for the different types of insulin. Per CRNP S.C., the peak times and onset times vary based on the type of insulin that was administered. Rapid acting insulin, called Humulin R, is generally given to a diabetic right before meals and at bedtime with a snack. Rapid acting insulin begins to work within one half hour to one hour (0.5-1 hr) and peaks between five and ten hours (5-10 hrs). Humulin-N is given routinely to a diabetic and the onset is one to one and a half hours (1-1.5 hrs). Hulumin-N peaks between four and six hours (4-6 hrs) and lasts in the system for 24 hours.

16. On May 24, 2023, your Affiants along with PA OAG SA Joseph Stegman went to the residence of Heather PRESSDEE at 2608 S. Meadow Street, Natrona Heights, PA, to execute search warrants and interview PRESSDEE. Agents knocked on the residence door at approximately 0920 hours. Agents identified themselves and advised PRESSDEE they were there to speak with her about allegations that were received pertaining to facilities where she was previously employed. Affiant McElhaney 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 Agents. Agents requested consent to search PRESSDEE's residence, vehicles and cellular device. PRESSDEE signed consent forms for the residence, two vehicles, and her cellular device.

17. PRESSDEE stated that she went to the Community College of Allegheny County (CCAC) for nursing, but did not finish her degree. Instead, PRESSDEE became a Veterinary Technician and worked at Pittsburgh Veterinary Specialty and Emergency Center (PVSEC) for 14 years. PRESSDEE said that she provided critical animal care to include administering anesthesia. In addition, PRESSDEE practiced euthanasia. PRESSDEE later returned to CCAC and completed her degree, becoming a Registered Nurse (RN). PRESSDEE stated she was currently pursuing her Masters in Nursing. After completing her degree at CCAC, PRESSDEE began working at various facilities. Within two (2) years of obtaining her RN degree she became an Assistant Director of Nursing (ADON) at QLSC. While working at QLSC she became the interim Director of Nursing (DON) and that was a lot to take on. Per PRESSDEE, she had to provide direct resident care if there were call-offs. In addition, she had to complete her administrative duties.

18. While speaking with PRESSDEE on May 24, 2023, PRESSDEE admitted to Your Affiants that she administered improper doses of insulin to three (3) residents J.B, J.C., and E.A. with the intent to kill them, while she was employed at QLSC. PRESSDEE has already been charged for those administrations. Two (2) of the three (3) residents subsequently passed away.

19. Agents applied for and obtained search warrants for the contents of PRESSDEE's social media presence and digital presence to include, but not limited to, Facebook, Pinterest, Google, and Netflix. PRESSDEE's social media and digital presence demonstrates her knowledge of blood sugar, diabetes and insulin. For example, on September 26, 2018, PRESSDEE posted on Facebook that she "may kill a doctor today." She goes on to describe an incident in which she found a patient "shaking and sweating." She further explains that the doctor she "may kill" criticized her because she checked

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

the patient's blood sugar. She ends the post by saying "I know what hypoglycemia looks like."

20. Your Affiants know that PRESSDEE has been clinically trained in the treatment and identification of hypoglycemia and diabetic treatment. Your Affiants know through discussions with PRESSDEE and her mother that PRESSDEE has intimate knowledge of the treatment of diabetes through assisting in the treatment and management of her mother's diabetes. Through her knowledge, PRESSDEE is aware that blood sugar issues are common and dangerous in elderly patients.

21. Affiant Fantini reviewed PRESSDEE's Facebook records and discovered that on February 07, 2018, PRESSDEE posted an image on Facebook regarding dosing decisions for insulin. The image displays two spoons with one having two (2) units of insulin on it and the other having ten (10) units of insulin on it. It is written, "If you needed to take 2 units, but accidentally took 10 units instead, it could be deadly in a matter of hours".

22. A review of PRESSDEE's Pinterest page identified that PRESSDEE "pinned" an image depicting the various types of insulin, their onset, and their peaks. Also included is a diagram detailing how blood sugar is regulated.

23. A forensic download of PRESSDEE's personal cellular telephone was conducted by the PA OAG Forensics Unit. SA Joseph Stegman reviewed the contents of the extraction and he identified that PRESSDEE's cellular telephone contained the following text messages from PRESSDEE to her mother:

- a. April 06, 2022, "Can I kill this man at Taco Bell"
- b. June 10, 2022, "I'm gonna murder already".
- c. June 26, 2022, relating to a resident, "If you get like this you will get pillow therapy"
- d. July 05, 2022, "She's gonna die!!!!"
- e. July 19, 2022, "If this arbys guys says one more minute one more time he will get stabbed"
- f. July 21, 2022, "Lisa will die today"
- g. September 02, 2022, "Im gonna murder my aides"
- h. September 06, 2022, PRESSDEE is complaining to her mom about a male resident yelling and writes, "I drugged him already and I don't know how he is awake"
- i. October 17, 2022, "I'm going to kill this bitch on the phone" followed by "She's gonna die!!!!"
- j. November 19, 2022, "I'm going to get fired tonight", "If this [sic] says excuse me one more time because she can't remember my name she may die"
- k. On December 07, 2022, while texting about a female resident sleeping, PRESSDEE writes, "Or she could be dead, she hasn't made a noise since 9 and I'm not checking on her". PRESSDEE later writes, "Well she's alive and she may die now"
- l. December 25, 2022, "I can't with this lady tonight" followed by, "She's gonna get pillow therapy"
- m. January 14, 2023, "I may stab a nurse already"
- n. January 21, 2023, "Whatever I'm gonna stab a bitch today"
- o. January 27, 2023, "This nurse may die today"

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/2/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
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- p. May 09, 2023, "And now a pizza man may die"
- q. May 11, 2023, "I would rather work the cart, should I tell her that"
- r. May 12, 2023, "But I may kill this resident. I need to set some sort of boundary with him. He's following me and he's driving me nuts"

24. A review of PRESSDEE's Apple account was completed by SA Joseph Stegman. Among PRESSDEE's internet search history were "Lispro insulin", "Lilly pharmaceutical insulin", "ICD 10 for diabetes", and "how long is insulin good for". In addition, PRESSDEE queried for an obituary for Decedent I.S.

### Encompass Health Rehabilitation Hospital of Harmarville

25. PRESSDEE was employed as a Registered Nurse (RN) at Encompass Health Rehabilitation Hospital of Harmarville from October 01, 2018 through April 21, 2019.

26. PRESSDEE's employee file indicates that she was counseled on December 07, 2018, due to an error with insulin administration and not following doctor's orders. It notes PRESSDEE received verbal counseling. The Corrective Action Plan states that PRESSDEE would meet with the Nurse Educator or Diabetic Coordinator to review insulin coverage/insulin administration. PRESSDEE's supervisor at Encompass, RN J.S., reported that PRESSDEE was disciplined for "dosing insulin by herself and not following the doctor's orders when it came to the amount of insulin a patient was supposed to receive". R.N. J.S. had concerns that PRESSDEE was harming residents and took actions internally. PRESSDEE's former coworker, RN F.B., stated that there were suspicions early during PRESSDEE's employment that she was intentionally harming patients and that PRESSDEE was reprimanded for making up her own insulin doses.

### Platinum Ridge Center for Rehabilitation and Healing

27. PRESSDEE was employed at Platinum Ridge Center for Rehabilitation and Healing from September 2019 through January 2020.

28. While reviewing PRESSDEE's employee file from Platinum Ridge Center for Rehabilitation and Healing it was noted that PRESSDEE listed a fictitious name of a past colleague as a reference. The telephone number listed for that fictitious past colleague matched a telephone number known by the investigative team. That telephone number was known as belonging to a relative of PRESSDEE. Agents interviewed the relative that telephone number belongs to and that relative confirmed that the previously served as a reference for PRESSDEE.

### Concordia at Rebecca Residence

29. PRESSDEE was employed as a Registered Nurse (RN) at Concordia at Rebecca Residence from October 30, 2020 through April 11, 2021.

30. While reviewing PRESSDEE's employment file it was discovered that she listed a fictitious name of a past colleague as a reference. The telephone number listed for that fictitious past colleague was a telephone number that the investigative team was familiar with. That telephone number was known to belong to a relative of PRESSDEE's. In an interview with the relative, the relative confirmed they served as a reference for PRESSDEE.

31. Decedent R.E., an 89 year old female, was a resident at Concordia at Rebecca Residence who passed away on December 17, 2020. A review of the clinical notes identify that Decedent R.E.

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# POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

was not a diabetic. The records indicate that PRESSDEE provided care to decedent R.E. through the night of December 16, 2020 into the morning of December 17, 2020. In those notes, PRESSDEE documented that the decedent was found crying and in pain. PRESSDEE annotated that she provided the decedent with pain medications, which provided no relief to the decedent, at approximately 0120 hours. Subsequent notes input by PRESSDEE, identify that she provided comfort measures at approximately 0300 hours. PRESSDEE annotated that she found the resident with no heartbeat and PRESSDEE pronounced her deceased at 0555 hours on December 17, 2020.

32. In interviews with PRESSDEE, PRESSDEE admitted to administering 120 units of short-acting insulin to Decedent R.E. PRESSDEE stated that Decedent R.E. was on hospice and was not doing well. PRESSDEE stated that the resident had a low pulse ox and was gasping for air. PRESSDEE indicated that she gave Decedent R.E. sixty (60) units of short-acting insulin and it did not work so she then gave the decedent an additional sixty (60) units of short-acting insulin. PRESSDEE stated that the victim passed at the facility during PRESSDEE's overnight shift.

### Belair Healthcare and Rehabilitation (Guardian)

33. PRESSDEE began working at Belair Healthcare and Rehabilitation on April 19, 2021 as the Assistant Director of Nursing (ADON). PRESSDEE ceased working there February 28, 2022. In general, 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 resident care concerns, conduct internal investigations, investigate allegations of abuse, and handle the scheduling of nursing staff. It is common for the DON and/or ADON to provide direct resident care in the event of staff call offs.

34. Guardian Regional Director of Operations (RDO), B.N., advised agents that staff at Belair had concerns that PRESSDEE was killing residents. PRESSDEE's coworkers at the facility began to question PRESSDEE's actions following the passing of Decedent M.C. Staff at the facility advised facility administration that there was a pattern of individuals passing under PRESSDEE's care. Per B.N., following the accusations, PRESSDEE was suspended pending an internal investigation. The internal investigation revealed there was no identifiable evidence uncovered to support the concerns of PRESSDEE's coworkers.

35. Decedent S.S., a 58 year old female, was a resident at Belair and passed away on August 09, 2021. Decedent S.S. was not an insulin dependent diabetic. PRESSDEE was on duty and records indicate that PRESSDEE provided care to Decedent S.S. on July 23, 2021. PRESSDEE documented that Decedent S.S. was "doing well." Records obtained from Belair indicate that Decedent S.S. was found unresponsive on July 24, 2021. At that time, Decedent S.S. was found to have a blood sugar reading of 51. Decedent S.S. was sent to the hospital and admitted for hypoglycemia. Decedent S.S. returned to Belair on July 30, 2021. On August 02, 2021, PRESSDEE documented that Decedent S.S.'s blood sugar dropped suddenly and they were sent to Allegheny Valley Hospital. That day, PRESSDEE was documented as providing care to Decedent S.S. up until the time of hospitalization. PRESSDEE documented that Decedent S.S.'s blood sugar dropped from 180 to 90, to 45. Decedent S.S. was admitted into the hospital for hypoglycemia a second time. Decedent S.S. appeared to be stabilized at the hospital and returned to Belair on August 06, 2021. A note entered by a different nurse on August 08, 2021 indicated there were no signs of hypoglycemia. On August 09, 2021, PRESSDEE documented in decedent S.S.'s medical chart that she found decedent S.S. without a heartbeat and decedent S.S. was declared deceased shortly thereafter.

36. Following PRESSDEE's arrest, Allegheny Valley Hospital Chief Medical Officer, Dr. W.B., contacted the investigative team and reported that Decedent S.S. was seen in the emergency room on

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/12/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

August 02, 2021, due to a hypoglycemic event similar to the other victims. Dr. W.B. noted that Decedent S.S. had a blood sugar reading below twenty (20) upon arriving at the hospital.

37. In interviews with PRESDEE, PRESSDEE admitted to your Affiants that she administered sixty (60) units of short-acting insulin to Decedent S.S. PRESSDEE stated that Decedent S.S. passed within two hours after the insulin injection. She stated that another nurse found decedent S.S. unresponsive later and a code blue was called. When PRESSDEE was asked why she administered insulin to S.S., PRESSDEE said that S.S. looked at her like an animal would, helpless and like she needed something. Per PRESSDEE, decedent S.S. had no quality of life.

38. Decedent M.B., a 68 year old female, passed away at Belair Health and Rehabilitation Center on September 28, 2021. A review of the medical records received from Belair Health and Rehabilitation Center indicate that decedent M.B. was not a diabetic. The records identify that PRESSDEE provided direct care to the decedent on the date of death, September 28, 2021. The progress notes indicate that PRESSDEE began to document ineffective medication administrations at approximately 0515 hours. Throughout the course of the day PRESSDEE annotates that the decedent was not swallowing and that she was continuing comfort measures. PRESSDEE called the time of death at 1610 hours with the family present at bedside.

39. In interviews with PRESSDEE, PRESSDEE admitted to administering one hundred (100) units of short-acting insulin to decedent M.B. PRESSDEE stated that decedent M.B. was "actively passing" and was unable to breathe. Per PRESSDEE, the pain medications the decedent was prescribed were not relieving the pain so PRESSDEE injected her with 100 units of short-acting insulin. PRESSDEE stated that the decedent was morbidly obese which is why she increased the dosage of insulin. PRESSDEE reported that the decedent passed away approximately three (3) hours after the injection.

40. Decedent J.R., a 79 year old male, passed away at Belair Health and Rehabilitation Center on November 16, 2021. In interviews with PRESSDEE, PRESSDEE provided the investigative team with J.R.'s name and stated that she administered 100 units of insulin to decedent J.R.

41. A review of the medical records indicate that decedent J.R. was not a diabetic. According to facility records, PRESSDEE worked on November 15, 2021, from 0000-0800 hours. As the facility ADON, PRESSDEE would have had access to the med cart and/or med room. The decedent's time of death was called by another nurse at 1845 hours on November 16, 2021.

42. Decedent M.C., a 92 year old female, passed away on December 28, 2021 at Belair. A review of the medical records indicate that Decedent M.C. was not a diabetic. On December 26, 2021, an LPN documented in the medical file that Decedent M.C.'s "mood appears pleasant ... (that the victim was) oriented to person...meds effective". Belair records show that on December 27, 2021, PRESSDEE took over care of Decedent M.C. On December 28, 2021 Decedent M.C. suffered a change in condition and PRESSDEE annotated in the progress notes that she "called the MD about the change in the resident." PRESSDEE took Decedent M.C.'s vital signs, but notably failed to take the blood sugar when she took all other vital signs. PRESSDEE reported Decedent M.C. was "unresponsive." Decedent M.C.'s family elected for comfort measures only. At 1100 hours an Occupational Therapist (OT), K.M., attempted to enter Decedent M.C.'s room and PRESSDEE asked that OT K.M. leave. When OT K.M. attempted to enter again, PRESSDEE insisted that Decedent M.C. not be touched. Decedent M.C. passed away at 1319 hours that same day and PRESSDEE pronounced her deceased.

43. In interviews with PRESSDEE, PRESSDEE admitted she administered sixty (60) units of short-acting insulin to M.C.

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

44. Victim N.H., an 88 year old male, suffered a hypoglycemic incident at Belair on February 24, 2022, but did not die as a result. Victim N.H. did pass away at a separate facility several months later on December 15, 2022. A review of the medical records indicate that Decedent N.H. was not diabetic. On February 24, 2022, victim N.H. was found unresponsive at Belair. Victim N.H.'s blood sugar was recorded by a nurse as 38, which is low. N.H. was given glucagon in an effort to raise the blood sugar. Victim N.H. was sent to the hospital as a result. Victim N.H. was admitted to the hospital with a blood sugar of 83. Victim N.H.'s blood sugar continued to rise at the hospital. Given the blood sugar issues, a C-peptide test was ordered by the hospital and the readings were found to be abnormally low, being outside of the reference range. The treating doctor concluded that insulin had been administered to a non-diabetic patient. Victim N.H. remained in the hospital until March 11, 2022, when he was stabilized and released. The medical record review identified that PRESSDEE was on shift and documented as providing care to victim N.H. leading up to the hypoglycemic incident. PRESSDEE worked the night shift on the evening of February 23, 2022 into February 24, 2022. PRESSDEE is documented as providing care to Decedent N.H. during the day shift on February 24, 2022.

45. In interviews with PRESSDEE, PRESSDEE admitted that she administered one hundred (100) units of fast-acting insulin to victim N.H.

46. Dr. T.N. treated victim N.H. at Allegheny Valley Hospital. Dr. T.N. was concerned that victim N.H. and another patient, decedent S.S., had both come from Belair, and both appeared to be treated by PRESSDEE at Belair. Dr. T.N. made a referral to the Pennsylvania Department of Health concerned that PRESSDEE was harming patients.

### Quality Life Services Chicora (QLSC)

47. PRESSDEE began working at Quality Life Services Chicora (QLSC) as the Assistant Director of Nursing (ADON) on May 23, 2022. On or around July 2022, PRESSDEE became the Interim Director of Nursing (DON) at QLSC. PRESSDEE continued working at QLSC through November 28, 2022. 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 regulations. Additionally, they address any resident care concerns, conduct internal investigations, investigate allegations of abuse and handle the scheduling of nursing staff. The DON and/or ADON will provide direct resident care in the event of staff call offs.

48. PRESSDEE's QLSC emails were reviewed by Affiant Fantini. On September 01, 2022, PRESSDEE sent an email seeking electronic access to Butler Memorial Hospital records. This access was requested the same day that former QLSC resident, victim E.A. was sent to Butler Memorial Hospital after suffering a hypoglycemic event. PRESSDEE was charged on May 24, 2023, in connection to that incident.

49. Victim B.S. became a resident at QLSC on May 20, 2022, when she was 83 years of age. QLSC medical records do not indicate that victim B.S. was diabetic. QLSC medical records show that B.S. displayed symptoms consistent with hypoglycemia in June 2022. QLSC records indicate that on June 17, 2022, victim B.S. slept until approximately 1300 hours. Victim B.S. suffered a fall on that date, was noted to be "groggy", and was unable to move on her own when she woke. QLSC records show that PRESSDEE was working at the time victim B.S. was experiencing these symptoms which are consistent with hypoglycemia. QLSC schedules indicate that PRESSDEE clocked in and out as follows: June 14, 2022: 0628 hours through 1627 hours; June 15, 2022: 0615 hours through 1609 hours; June 16, 2022: 0631 hours through 1907 hours; June 17, 2022: 0616 hours through 1439 hours; June 20, 2022: 0619 hours through 1528 hours; June 21, 2022: 0624 hours through 1549 hours; June 22, 2022: 0621 hours through 1627 hours; June 23, 2022: 0715 hours through 1651 hours; June 24, 2022: 0716 hours through 1600 hours;

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Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

June 25, 2022: 1950 hours through 0616 hours on June 26, 2022. QLSC records list victim B.S. as again being lethargic, drowsy, and confused on June 25, 2022. In the days prior to June 25, 2022, PRESSDEE is documented as providing care. In the days prior to June 25, 2022, victim B.S. was noted in the progress notes to be physically active, pacing and running down the hall.

50. In interviews with PRESSDEE, PRESSDEE reported that she injected victim B.S. with insulin. PRESSDEE noted that her attempt was not successful and that victim B.S. survived. Per PRESSDEE, victim B.S. "slept off" the incident. PRESSDEE stated that victim B.S. was not diabetic.

51. Decedent J.F., a 92 year old male, passed away on August 06, 2022 at QLSC. A review of the medical records showed that Decedent J.F. became a resident of QLSC on November 09, 2018. Decedent J.F. was not diabetic. QLSC records indicate that on August 06, 2022, at 0804 hours, PRESSDEE annotated that Decedent J.F. was found actively seizing and was administered Morphine and Ativan. PRESSDEE also wrote in that note that she reportedly checked decedent J.F.'s blood sugar and it was allegedly at a normal level. QLSC facility records confirm that PRESSDEE worked on August 06, 2022, from 0555 hours through 1851 hours.

52. On August 08, 2022, PRESSDEE received an email from Butler County Area Agency on Aging (AAA) asking how decedent J.F. passed. PRESSDEE responded that on Saturday he had no urine output, that he suffered a massive seizure, and that he continued to seize for a half hour.

53. In interviews with PRESSDEE, PRESSDEE admitted to administering sixty (60) units of short-acting insulin to decedent J.F. around the time he was seizing.

54. Victim C.K. became a resident at QLSC on September 24, 2022, when he was 51 years of age. Medical records list C.K. as a type 1 diabetic. A review of records obtained from QLSC revealed that C.K. suffered a hypoglycemic incident on October 8 and 9, 2022. C.K.'s blood sugar is listed as going as low as forty three (43) the morning of October 09, 2022. Glucose gel was administered and C.K.'s blood sugar increased. QLSC staffing records indicate that PRESSDEE was on duty on October 06, 2022, from 0602 hours through 1555 hours. PRESSDEE worked again on October 07, 2022, from 0724 hours through 1545 hours and on October 08, 2022, from 1704 hours through 0623 hours on October 09, 2022.

55. In interviews with PRESSDEE, PRESSDEE admitted to administering sixty (60) units of short-acting insulin to victim C.K.

56. Decedent B.M., a 99 year old female, passed away at QLSC on November 06, 2022. A review of medical records showed that Decedent B.M. was not diabetic. According to the shift facility schedule PRESSDEE was at the facility on November 05, 2022, at 1731 hours through November 06, 2022, at 0628 hours. A review of the medication records identify that on November 06, 2022, at 0235 hours, PRESSDEE annotated that the decedent was found with no heartbeat or respiratory rate, at 0200 hours and that CPR was started at 0200. At 0242 hours, PRESSDEE wrote that the CPR was ineffective and that emergency response personnel called the time of death at approximately 0240 hours.

57. In interviews with PRESSDEE, PRESSDEE admitted to administering sixty (60) units of short-acting insulin to Decedent B.M. PRESSDEE stated that she knew that the decedent had passed; however, she left the room and let an aide find her approximately 30 minutes later. PRESSDEE then assisted with performing CPR on the decedent in accordance with the "full code" the decedent had on file.

58. Victim B.H., a 93 year old female, was a resident at QLSC. QLSC records identify that victim B.H. was not diabetic. A review of the medical records identify that victim B.H. was confined to a chair and unable to move on her own. Victim B.H. was identified as being "orientated with periodic forgetfulness but

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**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

was able to make her needs known." Victim B.H. was placed on hospice care on October 19, 2021. A review of her medical records identifies that on June 18, 2022, PRESSDEE provided direct resident care. PRESSDEE annotated that at 0500 the resident was diaphoretic and had an O2 reading of 78%. PRESSDEE annotated that she provided victim B.H. with oxygen and comfort medications. At 1033, RN S.M. annotated that victim B.H. was resting and had no signs of distress. During this shift, victim B.H. was fed with assistance. On June 30, 2022, PRESSDEE wrote in the quarterly review of victim B.H. that she had a significant change in status or recent decline in status. Victim B.H. was discharged from hospice on September 22, 2022, due to a lack of decline. B.H.'s medical records reflect inconsistent blood sugars as follows: On November 11, 2022, there is a blood sugar reading of 81, on November 18, 2022, there is a blood sugar reading of 128, and on November 23, 2022, there is a blood sugar reading of 76. QLSC staffing records show that PRESSDEE worked the following days and times: November 09, 2022: 0618 hours through 1654 hours; November 10, 2022: 0625 hours through 1724 hours; November 16, 2022: 0624 hours through 1644 hours; November 17, 2022: 0612 hours through 1605 hours; November 18, 2022: 0614 hours through 1525 hours; November 22, 2022: 0612 hours through 1524 hours; and November 23, 2022 0617 hours through 1530 hours.

59. In interviews with PRESSDEE, PRESSDEE reported that she injected victim B.H. with sixty (60) units of short acting insulin. She noted that her attempt was unsuccessful and that victim B.H. somehow overcame the low blood sugar. She stated that victim B.H. had vomited a few times, but that her blood sugar was not checked. PRESSDEE stated she obtained the insulin from the medication room.

Premier Armstrong Rehabilitation and Nursing Center

60. PRESSDEE began working at Premier Armstrong Rehabilitation and Nursing Center on November 30, 2022, as an RN. She worked there through December 31, 2022.

61. Premier Armstrong resident L.S. passed away on December 18, 2022. Decedent L.S. was a 90 year old female who became a resident at Premier Armstrong on September 20, 2022. Medical records indicate that Decedent L.S. was not a diabetic. Medical records show that on December 11, 2022, PRESSDEE began noting that L.S.'s daughter should consider hospice care due to sodium and chloride level results. PRESSDEE continued to note between December 11, 2022 and December 17, 2022, that L.S. remained lethargic. PRESSDEE prepared a Change in Condition report alleging an altered mental status and unresponsiveness on December 17, 2022 at 1734 hours. On December 17, 2022, PRESSDEE noted that she checked the patient's blood glucose, something that was unusual as the patient was not diabetic. If recorded accurately, the blood sugar reading was high. Additionally, PRESSDEE noted several times on the evening of December 17, 2022, that L.S. was having episodes of apnea in which she stopped breathing for up to thirty (30) seconds. PRESSDEE did not alert doctors or provide any medical intervention. At 0130 hours on December 18, 2022, PRESSDEE recorded L.S.'s time of death as 0128 hours.

62. In interviews with PRESSDEE, PRESSDEE admitted to administering sixty (60) units of short acting insulin to decedent L.S. Decedent L.S. subsequently passed while PRESSDEE was still on shift.

63. Decedent A.S. passed away at Premier Armstrong on December 27, 2022. Decedent A.S. was an 85 year old female who was not an insulin-dependent diabetic, per medical records. Premier Armstrong medical records indicate that on December 17, 2022, A.S. was hard to wake, her words were sluggish, and she was hard to understand. Decedent A.S. was transported to the hospital. Decedent A.S. had a temperature of 102 degrees the day prior to her death. An elevated temperature

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**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

is a symptom of hypoglycemia. Facility schedules indicate that PRESSDEE worked on December 15, 2022 1900 hours until 1100 hours on December 16, 2022. PRESSDEE then worked again from 1500 hours on December 17, 2022 through 0700 hours December 18, 2022. Facility records confirm that PRESSDEE was working at the time A.S. was transported to the hospital.

64. In interviews with PRESSDEE, PRESSDEE admitted to administering sixty (60) units of short-acting insulin to Decedent A.S. PRESSDEE indicated that she had administered the insulin the day that decedent A.S. had been sent to the hospital, which has been identified as December 17, 2022.

Sunnyview Rehabilitation and Nursing Center

65. PRESSDEE began working at Sunnyview Rehabilitation and Nursing Center on January 02, 2023. PRESSDEE was hired as the Unit Manager (UM) on Cardinal Unit. According to Sunnyview ADON K.F., PRESSDEE directly oversaw the Licensed Practical Nurses (LPNs) and Certified Nursing Assistants (CNAs) on that unit. PRESSDEE would provide direct resident care in the event there was a staffing shortage. PRESSDEE would have had access to the med cart if she was assigned to the med cart. As the UM PRESSDEE had keys to med room on her assigned unit.

66. While reviewing PRESSDEE's cellular device, SA STEGMAN located the following text messages:

- a. On March 03, 2023, PRESSDEE text ADON K.F. stating that she could work 7-7 both Saturday and Sunday, "And I'm fine with a cart"
- b. On March 25, 2023, PRESSDEE text ADON K.F. "I can take the cart tomorrow am to give Bonnie a break"

67. During interviews of staff at Sunnyview, Certified Nursing Assistant (CNA) S.F. advised Your Affiants that PRESSDEE would "religiously" say that residents "just needed to die".

68. LPN H.K.#2 advised Your Affiants that they began to notice residents who PRESSDEE had access to were passing unexpectedly. LPN H.K.#2 noted that it was not common for a Unit Manager to work a med cart, but that PRESSDEE was always "excited" to work the med cart. Additional interviews of Sunnyview staff led to the identification of other residents who had passed unexpectedly and/or under suspicious circumstances in which nursing staff felt that PRESSDEE had involvement in their passing.

69. Decedent M.L., an 80 year old female, passed away at Sunnyview on January 21, 2023. Decedent M.L. was a diabetic and was on hospice care. A review of the medical records identified that PRESSDEE was providing direct care to the decedent on January 21, 2023, and announced the time of death at 1515 hours with the family present at bedside. The medical records indicate that on January 21, 2023, PRESSDEE provided comfort measures for the decedent until her passing.

70. In interviews with PRESSDEE, PRESSDEE admitted to administering 60 units of short-acting insulin to Decedent M.L. PRESSDEE stated that the decedent was on oxygen and that the facility was unable to keep her oxygen "needs" up. PRESSDEE reported that on January 21, 2023, Decedent M.L.'s pulse ox was in the 80s. PRESSDEE stated that due to this, she injected the decedent with 60 units of short-acting insulin.

71. Decedent A.V., a 104 year old female, passed away at Sunnyview on March 21, 2023. Decedent A.V. was not diabetic. Medical records indicate Decedent A.V. passed away at

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**POLICE CRIMINAL COMPLAINT**

<b>Docket Number:</b>	<b>Date Filed:</b> 11/21/23	<b>OTN/LiveScan Number</b>	<b>Complaint/Incident Number</b> MFI220278114N
<b>Defendant Name:</b>	<b>First:</b> HEATHER	<b>Middle:</b> IRENE	<b>Last:</b> PRESSDEE

approximately 0925 hours March 21, 2023. PRESSDEE is documented as working from 0630 hours through 2030 hours on March 20, 2023.

72. In interviews conducted by Your Affiants, CNA H.O. indicated they were surprised by A.V.'s passing. CNA H.O. indicated that Decedent A.V. was doing well and was able to walk to the bathroom. LPN H.K.#1 reported that Decedent A.V.'s passing was unexpected and that Decedent A.V. did not "undergo the dying process." LPN H.K.#1 indicated Decedent A.V. was mobile and was not malnourished. LPN H.K.#2 worked the day prior to A.V.'s passing. LPN H.K.#2 provided A.V. her food tray and her teeth. PRESSDEE asked LPN H.K.#2 how they could touch A.V.'s teeth and PRESSDEE called A.V. "disgusting". CNA M.M. was on shift when Decedent A.V. passed away. CNA M.M. indicated she worked the 3 pm – 11 pm shift, then worked the 11 pm – 7 am shift. CNA M.M. reported that PRESSDEE worked the 3pm-11pm shift. CNA M.M. said that everything was fine on the 3 pm – 11 pm shift and that Decedent A.V. was up and walking around. CNA M.M. returned to check on Decedent A.V. during her second shift and found Decedent A.V. foaming from the mouth, which she had never seen in her six (6) years of working in this position. CNA M.M. indicated PRESSDEE previously made the comment, "when is she going to die already", pertaining to Decedent A.V. LPN M.M. said that she treated Decedent A.V. the weekend prior to the resident's passing and the resident was relatively stable. LPN M.M. stated Decedent A.V.'s passing was completely unexpected. CNA S.F. told Your Affiants that PRESSDEE made comments that A.V. should not still be alive.

73. In interviews with PRESSDEE, PRESSDEE admitted to administering sixty (60) units of short acting insulin to Decedent A.V.

74. Decedent I.S., a 78 year old female, passed away on March 24, 2023, at Sunnyview. In interviews conducted by Your Affiants, LPN H.K.#1 indicated Decedent I.S. was in end stage COPD and had respiratory issues, but the resident's death was unexpected. Decedent I.S.'s treating doctor, Dr. J.R., indicated Decedent I.S. was very sick, had severe malnutrition, and was on hospice care within Sunnyview.

75. On the date of death, Decedent I.S.'s daughter, E.O. was present at the facility. E.O. observed Decedent I.S. to be warm and "oily." E.O. left the facility and went to her car for no longer than thirty (30) minutes. When E.O. returned, Decedent I.S. was having irregular breathing. E.O. notified PRESSDEE, who was caring for Decedent I.S. at the time. PRESSDEE entered the room with the med cart and E.O. went to the restroom. When E.O. returned she discovered that Decedent I.S. had passed.

76. In interviews with PRESSDEE, PRESSDEE admitted to administering a total of 120 units of short-acting insulin to Decedent I.S. When Decedent I.S. did not pass following the first administration of sixty (60) units of short-acting insulin, PRESSDEE administered another sixty (60) units to the victim.

77. Decedent G.S., a 90 year old male, passed away on March 25, 2023 at approximately 0710 hours, at Sunnyview. A review of the facility schedule and medical records identifies PRESSDEE provided direct care to Decedent G.S. on March 24, 2023, working from 1430 hours through 2230 hours. PRESSDEE clocked in at Sunnyview at 0630 hours the morning of Decedent G.S.'s death. Records obtained from Sunnyview show that Decedent G.S.'s blood sugar dropped significantly prior to death. Decedent G.S. was a non-insulin dependent diabetic.

78. In interviews conducted by Your Affiants, LPN K.S. stated they were told that Decedent G.S. had low blood sugar throughout the night. LPN K.S. indicated that when Decedent G.S. passed he was foaming at the mouth, which LPN K.S. found abnormal. LPN K.S. had only observed patients

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

foam at the mouth after a reaction to medication or due to low blood sugar. CNA A.T. worked overnight and into the morning that Decedent G.S. passed away. CNA A.T. indicated they observed Decedent G.S. and provided care to them at 0200 hours. Per CNA A.T., Decedent G.S. appeared fine at that time. When CNA A.T. returned to Decedent G.S.'s room at 0500 hours, Decedent G.S. was unresponsive. CNA A.T. and others were able to stabilize the resident and the resident appeared stable when CNA A.T. left at 0700 hours. LPN M.M. stated that Decedent G.S. was unresponsive at approximately 0500 hours. Decedent G.S.'s blood sugar was checked and it was 55, a low reading. LPN M.M. provided Decedent G.S. glucagon to raise his sugar. The next three blood sugar readings were 37, 77, and 147. LPN M.M. stated that 147 was a stable reading, but that they had inserted the port for an IV line in case of an additional sugar crash in order to quickly attach a Dextrose drip if needed. LPN M.M. stated that there was not an IV bag or a Dextrose bag hung. LPN M.M. reported that PRESSDEE arrived on shift at 0700 hours and worked the med cart. Per LPN M.M., she and PRESSDEE were the only nurses on shift at the time. After Decedent G.S. was stabilized and after PRESSDEE arrived, LPN M.M. stepped out for a break prior to finishing paperwork. When LPN M.M. returned Decedent G.S. was deceased.

79. Decedent G.S. was treated in Sunnyview by Dr. J.R. Dr. J.R. indicated Decedent G.S.'s blood sugar readings were typically stable and that Decedent G.S.'s blood sugar was never a problem. L.P.N. H.K.#2 reported that she was confused when she was told that G.S.'s blood sugar crashed because in the seven (7) months she had cared for him his blood sugar never went low. ADON K.F. reported that Decedent G.S.'s passing was unexpected and was due to a blood sugar issue. LPN C.A. indicated they were "pretty shocked" when they learned Decedent G.S. passed, stating that there were no signs of decline and that Decedent G.S. never had blood sugar issues. ADON K.F. stated that PRESSDEE went into work early the morning of Decedent G.S.'s passing and that PRESSDEE had the keys to the med cart that morning.

80. Your Affiants spoke with Decedent G.S.'s family who served as caregivers for Decedent G.S. for many years. The family indicated that while Decedent G.S. had diabetes, his blood sugar typically ran high, not low.

81. In interviews with PRESSDEE, PRESSDEE admitted to administering excess long-acting insulin to Decedent G.S. When this did not work, PRESSDEE administered two (2) 10 mL "flushes" to the decedent's IV port which she believed would cause an air embolism and lead to G.S.'s passing.

82. In speaking with PA OAG Nurse Investigator (NI) Kelly Baran, NI Baran reported that in general medical practice, an IV flush consists of a pre-filled saline syringe utilized to clean the IV port between medication administrations. The flushes come in various sizes and are not always 10 mL. The saline could have been ejected from the syringe and the syringe then filled with air and the air injected via the IV port. NI Baran also reported that an air embolism is a blockage in a blood vessel caused by air bubbles. To produce symptoms, more than 5 mL/kg has to be introduced into the venous system (via IV's and PICC lines). However, complications can occur with even 20 mL of air. An air embolism can cause significant and permanent damage to the central nervous system.

83. During the review of PRESSDEE's cellular device, SA Stegman located a text from PRESSDEE to ADON K.F. on March 25, 2023. PRESSDEE wrote that Decedent G.S. had a fall on the 22<sup>nd</sup>. PRESSDEE then sends another text to ADON K.F., "I just wanted to let you know, I forget how long you have to report a death. I know the death wasn't related to the fall".

84. While reviewing PRESSDEE's Facebook records, Affiant Fantini discovered that on September 03, 2018, in a group chat that was related to a nursing group that PRESSDEE served as a moderator of, PRESSDEE shared a news story. That news story pertained to a thirty four (34) year old nurse who was accused of intentionally injecting air into the catheters that were inserted into the

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/21/23	OTN/LiveScan Number	Complaint/Incident Number MFI220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

arteries of at least seven (7) patients. Two (2) of the patients passed and two (2) were left in vegetative states.

85. Decedent S.L., an 82 year old female, passed away at Sunnyview on April 17, 2023. Decedent S.L. was a non-insulin dependent diabetic. In interviews conducted by Your Affiants, LPN H.K. reported that the resident was being discharged from Sunnyview to go home to pass away, as she had cancer. LPN H.K.#1 did not believe Decedent S.L. had gone through the "dying process." CNA S.F. said that Decedent S.L. had cancer and was going home to pass in the comfort of her home. Per CNA S.F., PRESSDEE stated Decedent S.L. "needed to die." CNA S.F. reported that on the morning of Decedent S.L.'s death PRESSDEE exited Decedent S.L.'s room and stated the resident "was in the dying process".

86. In interviews with PRESSDEE, PRESSDEE admitted to administering insulin to the victim. PRESSDEE stated when this did not work, she administered one (1) syringe of air into Decedent S.L.'s PICC line in an effort to create an air embolism. Per PRESSDEE, S.L. ceased to breathe once the air was administered.

87. Decedent N.C., a 43 year old male, had been diagnosed with an anoxic brain injury, among other various ailments. According to his medical record and interviews with facility staff, Decedent N.C. was mobile. Decedent N.C. suffered a hypoglycemic event requiring hospitalization on April 30, 2023. Staffing records confirmed that PRESSDEE worked on April 30, 2023 beginning at 0625 hours. In N.C.'s medical record, PRESSDEE administered Decedent N.C.'s insulin shortly after 0700 hours. Decedent N.C. began to have a significant sugar crash and PRESSDEE administered multiple doses of glucagon. Eventually, PRESSDEE had Decedent N.C. sent to Butler Memorial Hospital where he was treated and released back to Sunnyview the same day. During the course of the evening of April 30<sup>th</sup>, into the morning of May 1<sup>st</sup>, Decedent N.C. deteriorated and passed away in the early morning hours of May 01, 2023 at Sunnyview.

88. Decedent N.C. was described as a "brittle diabetic," meaning he had difficulty regulating his blood sugar in general. Decedent N.C. was routinely given insulin for treatment. Medical records contain blood sugar readings from both Sunnyview and Butler Memorial Hospital. In addition, Decedent N.C. wore a Dexcom device that measured and recorded his blood sugar. A Dexcom device is a medical device with an implanted sensor for constant monitoring of an individual's blood sugar. These readings are sent to the individual's cellular telephone through an app and/or can be read directly from the device's sensor. The device and/or the cellular telephone app sounds an alarm when the individual's blood sugar goes too low or too high. It is an audible sound in which individuals near the diabetic individual would be able to hear the device sound for an indication of a hypoglycemic event.

89. Given Decedent N.C.'s history of diabetes, the decedent regularly saw endocrinologist Dr. M.S. Dr. M.S. did not treat Decedent N.C. on the date of his death, but reviewed his medical records progress notes, insulin administration records, and Dexcom device. Dr. M.S. indicated based on the information provided to him that it was clear Decedent N.C. was given much more than 12-15 units of insulin and was provided either a larger dosage of the short acting insulin, or a combination of both short acting and long acting insulin. Dr. M.S. also stated review of the medical records indicated Decedent N.C. was not checked during the overnight when being cared for by nurses other than PRESSDEE. Per Dr. M.S., "the suspected larger dose of insulin being administered in the morning, and the staff not taking corrective action through the night caused the death of [Mr. C...]"

90. RN L.B. was on shift on May 01, 2023, the morning Decedent N.C. passed. RN L.B. stated that PRESSDEE arrived at approximately 0600 hours the morning Decedent N.C. passed. RN L.B. indicated that Decedent N.C. had been sent to the hospital the previous day due to low blood sugar,

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/12/23	OTN/LiveScan Number	Complaint/Incident Number MF1220278114N
Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

and then returned to Sunnyview. On the morning of Decedent N.C.'s death, RN L.B. observed Decedent N.C. foaming at the mouth. RN L.B. checked the Dexcom which indicated it had a sensor error. RN L.B. checked Decedent N.C.'s blood sugar and it was a low reading of "23." RN L.B. indicated the last reading for Decedent N.C. was during the 3pm to 11pm shift the previous day, and the recorded blood sugar was in the 130s.

91. LPN F.S. stated that prior to Decedent N.C.'s passing, PRESSDEE made the comment that Decedent N.C. was "going to be the next one to die anyway." LPN H.K.#2 reported that on the Friday before Decedent N.C. passed LPN H.K.#2 was talking with him about the need to take his medications or he may not be there on Monday when LPN H.K.#2 returned and that she loved him and wanted to see him again. When LPN H.K.#2 left Decedent N.C.'s room, PRESSDEE told LPN H.K.#2 that the conversation LPN H.K.#2 had just had with Decedent N.C. was "gross." When LPN H.K.#2 arrived to work that Monday she learned that Decedent N.C. had coded and passed that morning. PRESSDEE approached LPN H.K.#2 and smacked her on the back and said, "Sorry to hear about (decedent's first name), but at least you got to say your final goodbye". CNA H.O. reported that PRESSDEE was mean to Decedent N.C. and in one incident yelled at the resident to get away from her "fucking desk," meaning the nurses station. CNA M.M. reported that PRESSDEE hated Decedent N.C. and would call him names to include "retarded". Per CNA M.M., PRESSDEE remarked that people with a quality of life like Decedent N.C. did not deserve to live.

92. LPN M.M. had recorded Decedent N.C.'s blood sugar to be 167 at approximately 0630 hours on April 30, 2023. Thirty (30) minutes later PRESSDEE entered a progress note indicating it was 380. Per RN C.W. when Decedent N.C. passed he was foaming at the mouth, which RN C.W. had only observed once before in their 23 year career.

93. LPN M.H. was on shift the morning Decedent N.C. passed away. LPN M.H. said she went into Decedent N.C.'s room to get him ready for dialysis, and Decedent N.C. was fine. LPN M.H. exited the room to get something, and when LPN M.H. returned, Decedent N.C. "was gone."

94. Agents obtained a video of an insulin pen identical to the one used by PRESSDEE to administer insulin to Decedent N.C. Increasing the dosage requires turning the cap of the pen multiple rotations to go from 12 to 60 (the amount PRESSDEE admitted to injecting Decedent N.C. with).

95. In an interview with Certified Registered Nurse Practitioner (CRNP) M.G., CRNP M.G. reported that the morning of Decedent N.C.'s passing PRESSDEE commented either, "They think I killed (decedent's first name)" or "I think I killed (decedent's first name)". CRNP M.G. denied engaging in further conversation.

96. ADON K.F. confirmed that PRESSDEE had been working the med cart on April 30, 2023, the day Decedent N.C. was sent to the hospital for hypoglycemia. ADON K.F. reported that she does not believe she has ever seen Decedent N.C.'s blood sugar go as low as it did on April 30, 2023 and May 01, 2023. Per ADON K.F., Decedent N.C. wore a Dexcom device and the sensor would need to be changed periodically. As the UM, PRESSDEE would have been in charge of ensuring the sensor was changed timely.

97. During Your Affiants initial interview with PRESSDEE on May 24, 2023, PRESSDEE denied intentionally harming Decedent N.C., but admitted to administering insulin to him. In that interview, PRESSDEE admitted that she gave the decedent more insulin than he should have been given and stated that as soon as she did she knew she "killed him". In subsequent interviews with Agents, PRESSDEE stated that she gave Decedent N.C. too much insulin. Per PRESSDEE, Decedent N.C. was to receive seven (7) units and she intentionally administered sixty (60) units. PRESSDEE confirmed that she had previously not told Your Affiants the truth in regards to the amount of insulin she purposefully injected him with. PRESSDEE stated that the decedent crashed faster than expected

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# POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: HEATHER	Middle: IRENE	Last: PRESSDEE

which is why she provided the glucagon and sent him to the hospital. PRESSDEE did not expect the decedent to recover and return to the facility.

98. The defendant has admitted to harming, with the intent to kill, all patients named in this Affidavit. Her conduct spanned approximately five years over the course of eleven facilities in Armstrong, Allegheny, Westmoreland and Butler Counties. Her criminal conduct exhibited a pattern of behavior. PRESSDEE would often work the medication cart, administer insulin during the night shift when staffing was lowest and the facilities were quiet. The victims would often remain undiscovered until morning. PRESSDEE often took steps to ensure her victims would expire prior to shift change so that they wouldn't be sent to the hospital where her scheme could be discovered through medical testing such as a C-peptide tests. If PRESSDEE sensed the victim would "pull through" there is a pattern of her taking additional measures to try to kill the victims before they could be sent to the hospital by either administering a second dose of insulin or the use of an air embolism to ensure death. Despite PRESSDEE's efforts to conceal her actions, the investigative team *uncovered the evidence detailed above in this Affidavit.* This evidence along with PRESSDEE's confessions demonstrate sufficient probable cause to support issuance of attached criminal complaint.

I, SA K. FANTINI / NA S. MCELHANEY, 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.

*K. Fantini #578 / S. McElhaneey #645*  
(Signature of Affiant)

Sworn to me and subscribed before me this 2 day of November, 2023

Date Maurice Palevich Magisterial District Judge

My commission expires first Monday of January, 2024

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