



DEPARTMENT OF THE ATTORNEY GENERAL

DAVID Y. IGE
GOVERNOR

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ATTORNEY GENERAL

For Immediate Release
September 8, 2016

News Release 2016-64

**KAILUA DENTIST INDICTED
FOR MANSLAUGHTER**

HONOLULU – Attorney General Doug Chin announced that an Oahu grand jury indicted Kailua resident Lilly Geyer late this afternoon on 37 counts, including medical assistance fraud, prohibited acts related to controlled substances, assault, and manslaughter. The indictment is based on events involving patients from October – December 2013 and April 2016, when Geyer was working as a dentist in Kailua.

The charges are a result of a joint investigation between the Department of Public Safety, Narcotics Enforcement Division and the Attorney General's Medicaid Fraud Control Unit, which is part of the Department of the Attorney General. Bail has been set at \$100,000 and a bench warrant has been issued for Geyer's arrest.

Medical assistance fraud (section 346-43.5, Hawaii Revised Statutes (HRS)) and prohibited acts related to controlled substances (section 329-41(a)(1), HRS) are class C felonies, punishable by up to 5 years in prison and a \$10,000 fine. Assault in the second degree (section 707-711(1)(b), HRS) is a class C felony punishable by a maximum of 5 years in prison and a \$10,000 fine, with a minimum of 1 year, 8 months before parole eligibility. Manslaughter is a class A felony punishable by a maximum of 20 years in prison and a \$25,000 fine, with a minimum of 6 years, 8 months before parole eligibility.

Geyer is subject to enhanced sentencing pursuant to section 706-660.2, HRS, because two of the patients were children under the age of eight. Geyer is presumed innocent unless and until she is found guilty of the charges beyond a reasonable doubt.

A copy of the indictment is attached to this release.

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Indictment Presented
and Filed
SEP 08 2015 2:49 P.M.
Date Time
C. Medeiros, Clerk
FIRST CIRCUIT COURT, STATE OF HAWAII

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

STATE OF HAWAII,

vs.

LILLY GEYER,

Defendant.

CR. No. 16-1-1443

COUNT 1:
MEDICAL ASSISTANCE FRAUD
(§346-43.5, H.R.S.)
(A.G. NO. 14-12595)

COUNT 2:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-1)

COUNT 3:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-2)

COUNT 4:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-3)

COUNT 5:
MEDICAL ASSISTANCE FRAUD
(§346-43.5, H.R.S.)
(A.G. NO. 14-12595-4)

COUNT 6:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-5)

COUNT 7:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-6)

COUNT 8:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-7)

COUNT 9:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-8)

COUNT 10:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-9)

COUNT 11:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-10)

COUNT 12:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-11)

COUNT 13:
MEDICAL ASSISTANCE FRAUD
§346-43.5, H.R.S.)
(A.G. NO. 14-12595-12)

COUNT 14:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-13)

COUNT 15:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-14)

COUNT 16:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-15)

COUNT 17:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-16)

COUNT 18:
MEDICAL ASSISTANCE FRAUD
(§346-43.5, H.R.S.)
(A.G. NO. 14-12595-17)

COUNT 19:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-18)

COUNT 20:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-19)

COUNT 21:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-20)

COUNT 22:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-21)

COUNT 23:
MEDICAL ASSISTANCE FRAUD
(§346-43.5, H.R.S.)
(A.G. NO. 14-12595-22)

COUNT 24:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-23)

COUNT 25:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-24)

COUNT 26:
ASSAULT IN THE SECOND DEGREE
(§707-711(1)(b), H.R.S.)
(A.G. NO. 14-12595-25)

COUNT 27:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-26)

COUNT 28:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-27)

COUNT 29:
MEDICAL ASSISTANCE FRAUD
(§346-43.5, H.R.S.)
(A.G. NO. 14-12595-28)

COUNT 30:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-29)

COUNT 31:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-30)

COUNT 32:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-31)

COUNT 33:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-32)

COUNT 34:
ASSAULT IN THE SECOND DEGREE
(§707-711(1)(b), H.R.S.)
(A.G. NO. 14-12595-33)

COUNT 35:
MANSLAUGHTER
(§707-702(1)(b), H.R.S.)
(A.G. NO. 14-12595-34)

COUNT 36:
MANSLAUGHTER BY OMISSION
(§707-702(1)(a) and 702-203(2),
H.R.S.)
(A.G. NO. 14-12595-35)

COUNT 37:
PROHIBITED ACTS RELATED TO
CONTROLLED SUBSTANCES
(§329-41(a)(1), H.R.S.)
(A.G. NO. 14-12595-36)

INDICTMENT

COUNT 1: On or about the 3rd day of October, 2013, to and including the 1st day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER did knowingly and willfully make or cause to be made to the medical assistance program a false statement or representation of a material fact in an application for a benefit or payment for furnishing services or supplies, or for the purpose of obtaining greater compensation than that to which LILLY GEYER is legally entitled, thereby committing the offense of Medical Assistance Fraud in violation of Section 346-43.5 of the Hawai'i Revised Statutes.

COUNT 2: On or about the 3rd day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 3: On or about the 3rd day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 4: On or about the 7th day of October, 2013, to and including the 6th day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER,

a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38(f)(2) of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 5: On or about the 8th day of October, 2013, to and including the 25th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER did knowingly and willfully make or cause to be made to the medical assistance program a false statement or representation of a material fact in an application for a benefit or payment for furnishing services or supplies, or for the purpose of obtaining greater compensation than that to which LILLY GEYER is legally entitled, thereby committing the offense of Medical Assistance Fraud in violation of Section 346-43.5 of the Hawai'i Revised Statutes.

COUNT 6: On or about the 8th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 7: On or about the 8th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did

distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 8: On or about the 9th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329-38 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Midazolam, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 9: On or about the 9th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 10: On or about the 9th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Midazolam, thereby committing

the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 11: On or about the 14th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 12: On or about the 14th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Midazolam, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 13: On or about the 16th day of October, 2013 to and including the 1st day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER did knowingly and willfully make or cause to be made to the medical assistance program a false statement or representation of a material fact in an application for a benefit or payment for furnishing services or supplies, or for the purpose of obtaining greater compensation than that to which LILLY GEYER is legally entitled, thereby committing the offense of Medical Assistance Fraud in violation of Section 346-43.5 of the Hawai'i Revised Statutes.

COUNT 14: On or about the 16th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 15: On or about the 16th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 16: On or about the 16th day of October, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Midazolam, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 17: On or about the 4th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did

distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Codeine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 18: On or about the 18th day of November, 2013, to and including the 29th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER did knowingly and willfully make or cause to be made to the medical assistance program a false statement or representation of a material fact in an application for a benefit or payment for furnishing services or supplies, or for the purpose of obtaining greater compensation than that to which LILLY GEYER is legally entitled, thereby committing the offense of Medical Assistance Fraud in violation of Section 346-43.5 of the Hawai'i Revised Statutes.

COUNT 19: On or about the 18th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 20: On or about the 18th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Midazolam, thereby committing

the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 21: On or about the 19th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 22: On or about the 19th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 23: On or about the 20th day of November, 2013, to and including the 6th day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER did knowingly and willfully make or cause to be made to the medical assistance program a false statement or representation of a material fact in an application for a benefit or payment for furnishing services or supplies, or for the purpose of obtaining greater compensation than that to which LILLY GEYER is legally entitled, thereby committing the offense of Medical Assistance Fraud in violation of Section 346-43.5 of the Hawai'i Revised Statutes.

COUNT 24: On or about the 20th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because the controlled substance was administered to JK, born in 2011, who was under the age of eight (8) on November 20, 2013, and LILLY GEYER knew or should have known JK was under the age of eight (8), and because JK suffered serious bodily injury.

COUNT 25: On or about the 20th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because the controlled substance was administered to JK, born in 2011, who was under the age of eight (8) on November 20,

2013, and LILLY GEYER knew or should have known JK was under the age of eight (8), and because JK suffered serious bodily injury.

COUNT 26: On or about the 20th day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, did recklessly cause serious bodily injury to JK, born in 2011, thereby committing the offense of Assault in the Second Degree in violation of Section 707-711(1)(b) of the Hawai'i Revised Statutes.

LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because JK, born in 2011, was under the age of eight (8) on November 20, 2013, and LILLY GEYER knew or should have known JK was under the age of eight (8), and because JK suffered serious bodily injury.

COUNT 27: On or about the 21st day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 28: On or about the 21st day of November, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby

committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 29: On or about 2nd day of December 2, 2013, to and including the 20th day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER did knowingly and willfully make or cause to be made to the medical assistance program a false statement or representation of a material fact in an application for a benefit or payment for furnishing services or supplies, or for the purpose of obtaining greater compensation than that to which LILLY GEYER is legally entitled, thereby committing the offense of Medical Assistance Fraud in violation of Section 346-43.5 of the Hawai'i Revised Statutes.

COUNT 30: On or about the 2nd day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

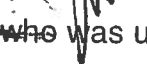
COUNT 31: On or about the 2nd day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

COUNT 32: On or about the 3rd day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Meperidine, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because the controlled substance was administered to FB, born in 2010, who was under the age of eight (8) on November 20, 2013, and LILLY GEYER knew or should have known FB, who was under the age of eight (8), and because FB suffered serious bodily injury.

COUNT 33: On or about the 3rd day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did distribute, administer, prescribe, or dispense a controlled substance in violation of Section 329-38 of the Hawai'i Revised Statutes, to wit Chloral-Hydrate, thereby committing the offense of Prohibited Acts Related to Controlled Substances, in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because the controlled substance was administered to FB, born in 2010, who was under the age of eight (8) on December 3,

2013, and LILLY GEYER knew or should have known FB, ~~who~~  was under the age of eight (8), and because FB suffered serious bodily injury.

COUNT 34: On or about the 3rd day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, did recklessly cause serious bodily injury to FB, born in 2010, thereby committing the offense of Assault in the Second Degree in violation of Section 707-711(1)(b) of the Hawai'i Revised Statutes.

LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because FB, born in 2010, was under the age of eight (8) on November 20, 2013, and LILLY GEYER knew or should have known FB was under the age of eight (8), and because FB suffered serious bodily injury.

COUNT 35: On or about the 3rd day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, did recklessly cause the death of FB, born in 2010, on the 3rd day of January, 2013, thereby committing the offense of Manslaughter in violation of Section 707-702(1)(b) of the Hawai'i Revised Statutes.

LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because FB, born in 2010, was under the age of eight (8) on November 20, 2013, and LILLY GEYER knew or should have known FB was under the age of eight (8), and because FB suffered serious bodily injury.

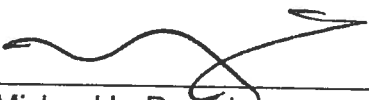
COUNT 36: On or about the 3rd day of December, 2013, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, did recklessly cause the death of FB, born in 2010, on January 3, 2014, by omission, by recklessly omitting to perform a duty imposed by law, to wit, Hawai'i Revised Statutes §663-1.6(a), thereby committing the

offense of Manslaughter by Omission in violation of Sections 707-702(1)(a), 702-203(2) and 663-1.6(a) of the Hawai'i Revised Statutes.

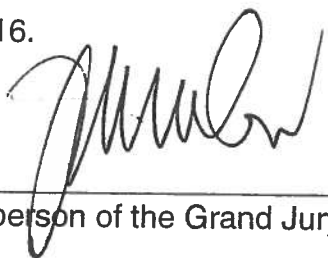
LILLY GEYER is subject to sentencing pursuant to Section 706-660.2 of the Hawai'i Revised Statutes, Sentence of Imprisonment for Offenses Against Children, Elder Persons, or Handicapped Persons, because FB, born in 2010, was under the age of eight (8) on December 3, 2013, and LILLY GEYER knew or should have known FB was under the age of eight (8), and because FB suffered serious bodily injury.

COUNT 37: On or about the 22nd day of April, 2016, to and including the 7th day of September, 2016, in the City and County of Honolulu, State of Hawai'i, LILLY GEYER, a person who is subject to Part III of the Uniform Controlled Substance Act, Chapter 329 of the Hawai'i Revised Statutes, did fail to notify the State of Hawai'i Department of Public Safety of the discontinuance of her business and/or professional practice pursuant to Hawai'i Administrative Rules Title 23 Subtitle 3 Chapter 200 Section 8(d), thereby committing the offense of Prohibited Acts Related to Controlled Substances in violation of Section 329-41(a)(1) of the Hawai'i Revised Statutes.

DATED: Honolulu, Hawai'i, September 8, 2016.



Michael L. Parrish
Deputy Attorney General



Foreperson of the Grand Jury