UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Case Number:

Violation:

v.

: 42 U.S.C. §§ 1320d-6(a)(2), (a)(3), (b)(3)

(Wrongful Disclosure of Individually

LAURIE NAPPER, : Identifiable Health Information)

:

Defendant.

INFORMATION

The United States Attorney informs the Court:

COUNT ONE

Unless specified otherwise, at all times material to this Information:

- 1. The Health Insurance Portability and Accountability Act ("HIPAA") protected individually identifiable health information collected from a patient by a health care provider.
 - 2. Howard University Hospital was a health care provider located in Washington, D.C.
- 3. Defendant LAURIE NAPPER was employed by Howard University Hospital as a medical technician in the general surgery department. In that capacity, NAPPER had access to individually identifiable health information of Howard University Hospital patients.
- 4. From in or about August 2010 through in or about December 2011, in the District of Columbia, defendant LAURIE NAPPER knowingly and for a reason other than permitted by Title 42, United States Code, Chapter 7, Subchapter XI, Part C, obtained and disclosed individually identifiable health information relating to another person, that is, NAPPER, without authorization

Case 1:12-cr-00128-CKK Document 1 Filed 05/14/12 Page 2 of 2

from Howard University Hospital, obtained the medical records of Howard University Hospital patients and sold for money the names, addresses, dates of birth, and Medicare numbers of Howard University Hospital patients to another person.

(Wrongful Disclosure of Individually Identifiable Health Information, in violation of Title 42, United States Code, Sections 1320d-6(a)(2), (a)(3), (b)(3).)

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By:

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