

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF RICHMOND: CRIMINAL TERM**

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**THE PEOPLE OF THE STATE OF NEW YORK**

**-against-**

**Indictment No:**

**FRANK CHINNICI,**

**Filed:**

**File #: 12-0287**

**Docket No: Office Origin**

**SEALED INDICTMENT**

**Defendant**

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**THE GRAND JURY OF THE COUNTY OF RICHMOND**, by this Indictment, accuses the defendant of the crime of:

**CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE (P.L. § 220.09-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about February 16, 2012, knowingly and unlawfully possessed one or more preparations, compounds, mixtures and substances of an aggregate weight of one-eighth ounce and more containing a narcotic drug, namely, oxycodone.

**C O U N T T W O**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the said defendant of the crime of:

**CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE (P.L. § 220.09-1)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about March 14, 2012, knowingly and unlawfully possessed one or more preparations, compounds, mixtures and substances of an aggregate weight of one-eighth ounce and more containing a narcotic drug, namely, oxycodone.

## **C O U N T T H R E E**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the said defendant of the crime of:

**FRAUD AND DECEIT (P.H.L. § 3397-4)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about and between July 18, 2011 and April 4, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. John Ventrudo, without the said defendant disclosing the fact that he was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner, namely, Dr. Jeffrey Goldstein.

## **C O U N T F O U R**

**AND THE GRAND JURY AFORESAID**, by this Indictment, further accuses the said defendant of the crime of:

**FRAUD AND DECEIT (P.H.L. § 3397-4)**, committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about July 18, 2011 and April 20, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. Jeffrey Goldstein, without the said defendant disclosing the fact that he was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner, namely, Dr. John Vetrudo.

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**DANIEL M. DONOVAN, JR.**  
**DISTRICT ATTORNEY**

**A TRUE BILL**

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**FOREPERSON**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF RICHMOND : CRIMINAL TERM**

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**THE PEOPLE OF THE STATE OF NEW YORK**

-against-

**FRANK CHINNICI**

Defendant(s)

Docket No.: **Office Origin**  
**SEALED INDICTMENT**

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**I N D I C T M E N T**

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**DANIEL M. DONOVAN, JR.**  
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Of Counsel

Jennifer Cilia  
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