

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

-----X
THE PEOPLE OF THE STATE OF NEW YORK

-against-

Indictment No:

JOHANNA PECCI,

Filed:

File #: 12-0404

Docket No: 2011RI011064

SEALED AS COUNTS 1-16

Defendant

-----X

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 THIRD DEGREE (P.L. § 220.16-12), 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 2, 2012, knowingly and unlawfully possessed a preparation, compound, mixture and substance of an aggregate weight of one-half ounce or more containing a narcotic drug, namely oxycodone.

C O U N T T W O

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 THIRD DEGREE (P.L. § 220.16-12), 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 5, 2012, knowingly and unlawfully possessed a preparation, compound, mixture and substance of an aggregate weight of one-half ounce or more containing a narcotic drug, namely oxycodone.

C O U N T T H R E E

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 THIRD DEGREE (P.L. § 220.16-12), 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 15, 2012, knowingly and unlawfully possessed a preparation, compound, mixture and substance of an aggregate weight of one-half ounce or more containing a narcotic drug, namely oxycodone.

C O U N T F O U R

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 THIRD DEGREE (P.L. § 220.16-12), 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 16, 2012, knowingly and unlawfully possessed a preparation, compound, mixture and substance of an aggregate weight of one-half ounce or more containing a narcotic drug, namely oxycodone.

C O U N T F I V E

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 March 22, 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 S I X

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 THIRD DEGREE (P.L. § 220.16-12), 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 23, 2012, knowingly and unlawfully possessed a preparation, compound, mixture and substance of an aggregate weight of one-half ounce or more containing a narcotic drug, namely oxycodone.

C O U N T S E V E N

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 March 22, 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 E I G H T

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 THIRD DEGREE (P.L. § 220.16-12), committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about April 6, 2012, knowingly and unlawfully possessed a preparation, compound, mixture and substance of an aggregate weight of one-half ounce or more containing a narcotic drug, namely oxycodone.

C O U N T N I N 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 March 2, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. Nkanga Nkanga, without the said defendant disclosing the fact that she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T E N

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 March 5, 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 she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T E L E V E N

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 March 14, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. Akiva Bergman, without the said defendant disclosing the fact that she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T T W E L V 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 March 16, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. Mark Goldstein, without the said defendant disclosing the fact that she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T T H I R T E E N

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 March 22, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. Shan Nagendra, without the said defendant disclosing the fact that she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T F O U R T E E N

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 March 23, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. David Zelefsky, without the said defendant disclosing the fact that she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T F I F T E E N

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 March 26, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. Luigi Parisi, without the said defendant disclosing the fact that she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T S I X T E E N

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 April 6, 2012, was supplied with a controlled substance and prescription therefore, to wit: oxycodone, by one practitioner, namely, Dr. Viktor Gribenko, without the said defendant disclosing the fact that she was supplied during the same course of treatment with a controlled substance and a prescription therefor, to wit: oxycodone, by another practitioner.

C O U N T S E V E N T E E N

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 December 10, 2011, 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 E I G H T E E N

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

PETIT LARCENY (P.L. § 155.25), committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about December 10, 2011, stole property belonging to a person known to the grand jury, consisting of a fragrance.

C O U N T N I N E T E E N

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

CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FIFTH DEGREE (P.L. § 165.40), committed as follows:

The said defendant, in the Borough of Staten Island, County of Richmond, City and State of New York, on or about December 10, 2011, knowingly possessed property consisting of a fragrance stolen from a person known to the grand jury with intent to benefit a person other than the owner thereof and impede the recovery by the owner thereof.

DANIEL M. DONOVAN, JR.
DISTRICT ATTORNEY

A TRUE BILL

FOREPERSON

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

JOHANNA PECCI

Defendant(s)

Docket No.: **2011RI011064**
SEALED INDICTMENT AS TO COUNTS 1-16

I N D I C T M E N T

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ASSISTANT DISTRICT ATTORNEY