

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
CATHY TAYLOR,	:	VIOLATIONS:
 a/k/a "Cat"	:	21 U.S.C. § 846 (conspiracy to possess
TERENA JOHNSON	:	with intent to distribute oxycodone - 1
	:	count)
	:	21 U.S.C. § 841(a)(1) (distribution of
	:	oxycodone - 2 counts)
	:	21 U.S.C. § 860 (distribution of
	:	oxycodone within 1000 feet of a school -
	:	2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about March, 2009, to on or about October 14, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CATHY TAYLOR,
a/k/a "Cat," and
TERENA JOHNSON**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute approximately 561 tablets of OxyContin, 80mg, which contain a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendants CATHY TAYLOR and TERENA JOHNSON, and others known and unknown to the grand jury, obtained multiple prescriptions for controlled substances from doctors in multiple patient names and filled the prescriptions at different pharmacies in Philadelphia.

3. Defendants CATHY TAYLOR and TERENA JOHNSON sold the prescription controlled substances to customers and received thousands of dollars of cash in return.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants CATHY TAYLOR and TERENA JOHNSON, and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere:

On or about March 19, 2009:

1. Defendant CATHY TAYLOR drove a white Mitsubishi SUV with a Pennsylvania license plate GYW-9358 (the Mitsubishi) to a location to sell oxycodone.

2. Defendant CATHY TAYLOR sold approximately 60 tablets of OxyContin, 80mg, for which she was paid approximately \$1,680.

On or about April 1, 2009:

3. Defendant CATHY TAYLOR drove the Mitsubishi to a location to sell oxycodone.

4. Defendant CATHY TAYLOR sold approximately 60 tablets of OxyContin, 80mg, for which she was paid approximately \$1,680.

5. On or about April 15, 2009, defendant CATHY TAYLOR sold approximately 150 tablets of OxyContin, 80mg, for which she was paid approximately \$4,200.

6. On or about May 1, 2009, defendant CATHY TAYLOR sold approximately 50 tablets of OxyContin, 80mg, for which she was paid approximately \$1,400.

7. On or about May 29, 2009, defendant CATHY TAYLOR sold approximately 60 tablets of OxyContin, 80mg, for which she was paid approximately \$1,680.

8. On or about June 10, 2009, defendant TERENA JOHNSON sold approximately 61 tablets of OxyContin, 80mg, for which she was paid approximately \$1,680.

9. On or about August 12, 2009, defendant TERENA JOHNSON sold approximately 60 tablets of OxyContin, 80mg, for which she was paid approximately \$1,730.

10. On or about October 14, 2009, defendant TERENA JOHNSON possessed approximately 60 tablets of OxyContin and other controlled substances.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CATHY TAYLOR ,
a/k/a "Cat,"**

knowingly and intentionally distributed approximately 150 tablets of OxyContin, 80mg, which contain detectable amount of oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 21 U.S.C. § 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CATHY TAYLOR ,
a/k/a "Cat,"**

knowingly and intentionally distributed, and aided and abetted the distribution of approximately 150 tablets of OxyContin, 80mg, which contain a detectable amount of oxycodone, a Schedule II controlled substance, within 1000 feet of the real property comprising the Stephen A. Douglas School, a public high school, located at 2700 Huntingdon Street, in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860, and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TERENA JOHNSON

knowingly and intentionally distributed approximately 61 tablets of OxyContin, 80mg, which contain detectable amount of oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 21 U.S.C. § 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TERENA JOHNSON

knowingly and intentionally distributed, and aided and abetted the distribution of approximately 61 tablets of OxyContin, 80mg, which contain a detectable amount of oxycodone, a Schedule II controlled substance, within 1000 feet of the real property comprising the Mother of Divine Grace School, an elementary school located at 2612 E. Monmouth Street in Philadelphia, Pennsylvania, and the Carroll Charles School, a public high school, located at 2700 E. Auburn Street, in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860, and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendants

**CATHY TAYLOR,
a/k/a "Cat," and
TERENA JOHNSON**

shall forfeit to the United States of America:

- a. any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of, such offenses; and
- b. any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including the \$14,050 defendants TAYLOR and JOHNSON received from an undercover law enforcement officer following their sales of oxycontin to the undercover officer.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

