## IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA | $:$ | CRIMINAL NO. $11-167$ |
| :--- | :--- | :--- |
| v. | $:$ | DATE FILED: $\quad 3-16-2011$ |
| REGINA MORT | $:$ | VIOLATIONS: <br> 21 U.S.C. § 843(a)(3) (obtaining |
|  | $:$ | controlled substances by fraud -174 <br> counts) |
|  | $:$ | 18 U.S.C. § 2 (aiding and abetting) |

## INDICTMENT

## THE GRAND JURY CHARGES THAT:

On or about the dates listed below, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

## REGINA MORT

knowingly and intentionally obtained, and aided and abetted the obtaining of, oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, deception, and subterfuge, that is, by presenting and causing to be presented the following prescriptions for oxycodone in the names of the persons listed below, which persons are known to the grand jury, when in fact the prescriptions were created without the knowledge of those persons and were not for a legitimate medical purpose (each prescription constituting a separate count of this indictment):

| Count | "Patient" | Date | Quantity in 5 mg <br> Tablets |
| :--- | :--- | :--- | :--- |
| 1 | S.F. | March 31, 2006 | 90 |
| 2 | S.F. | April 17, 2006 | 90 |
| 3 | S.F. | April 28, 2006 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg Tablets |
| :---: | :---: | :---: | :---: |
| 4 | S.F. | May 11, 2006 | 90 |
| 5 | S.F. | June 8, 2006 | 90 |
| 6 | S.F. | June 29, 2006 | 90 |
| 7 | S.F. | August 7, 2006 | 90 |
| 8 | S.F. | September 18, 2006 | 90 |
| 9 | S.F. | October 5, 2006 | 90 |
| 10 | S.F. | October 16, 2006 | 90 |
| 11 | S.F. | November 13, 2006 | 90 |
| 12 | S.F. | December 22, 2006 | 90 |
| 13 | S.F. | May 3, 2007 | 90 |
| 14 | S.F. | June 1, 2007 | 90 |
| 15 | S.F. | June 29, 2007 | 90 |
| 16 | S.F. | August 27, 2007 | 90 |
| 17 | S.F. | November 12, 2007 | 90 |
| 18 | S.F. | December 13, 2007 | 90 |
| 19 | S.F. | February 11, 2008 | 90 |
| 20 | S.F. | March 14, 2008 | 90 |
| 21 | S.F. | April 10, 2008 | 90 |
| 22 | S.F. | May 8, 2008 | 90 |
| 23 | S.F. | June 6, 2008 | 90 |
| 24 | S.F. | July 3, 2008 | 90 |
| 25 | S.F. | August 4, 2008 | 90 |
| 26 | S.F. | September 4, 2008 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg Tablets |
| :---: | :---: | :---: | :---: |
| 27 | S.F. | October 3, 2008 | 90 |
| 28 | S.F. | October 30, 2008 | 90 |
| 29 | S.F. | December 1, 2008 | 90 |
| 30 | S.F. | December 29, 2008 | 90 |
| 31 | S.F. | January 26, 2009 | 90 |
| 32 | S.F. | June 11, 2009 | 90 |
| 33 | S.F. | July 10, 2009 | 90 |
| 34 | S.F. | July 31, 2009 | 90 |
| 35 | P.K. | March 30, 2006 | 90 |
| 36 | P.K. | April 13, 2006 | 90 |
| 37 | P.K. | April 24, 2006 | 90 |
| 38 | P.K. | May 8, 2006 | 90 |
| 39 | P.K. | May 26, 2006 | 90 |
| 40 | P.K. | June 12, 2006 | 90 |
| 41 | P.K. | July 10, 2006 | 90 |
| 42 | P.K. | July 24, 2006 | 90 |
| 43 | P.K. | August 10, 2006 | 90 |
| 44 | P.K. | September 15, 2006 | 90 |
| 45 | P.K. | October 2, 2006 | 90 |
| 46 | P.K. | October 20, 2006 | 90 |
| 47 | P.K. | December 21, 2006 | 90 |
| 48 | P.K. | January 8, 2007 | 90 |
| 49 | P.K. | March 5, 2007 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg Tablets |
| :---: | :---: | :---: | :---: |
| 50 | P.K. | May 21, 2007 | 90 |
| 51 | P.K. | June 4, 2007 | 90 |
| 52 | P.K. | July 2, 2007 | 90 |
| 53 | P.K. | August 10, 2007 | 90 |
| 54 | P.K. | November 8, 2007 | 90 |
| 55 | P.K. | December 13, 2007 | 90 |
| 56 | P.K. | January 11, 2008 | 90 |
| 57 | P.K. | February 8, 2008 | 90 |
| 58 | P.K. | February 28, 2008 | 90 |
| 59 | P.K. | March 27, 2008 | 90 |
| 60 | P.K. | April 24, 2008 | 90 |
| 61 | P.K. | May 22, 2008 | 90 |
| 62 | P.K. | June 27, 2008 | 90 |
| 63 | P.K. | August 22, 2008 | 90 |
| 64 | P.K. | September 22, 2008 | 90 |
| 65 | P.K. | October 20, 2008 | 90 |
| 66 | P.K. | November 20, 2008 | 90 |
| 67 | P.K. | December 19, 2008 | 90 |
| 68 | P.K. | February 13, 2009 | 90 |
| 69 | P.K. | March 12, 2009 | 90 |
| 70 | P.K. | May 12, 2009 | 90 |
| 71 | P.K. | June 5, 2009 | 90 |
| 72 | P.K. | June 26, 2009 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg Tablets |
| :---: | :---: | :---: | :---: |
| 73 | P.K. | July 27, 2009 | 90 |
| 74 | P.K. | August 24, 2009 | 90 |
| 75 | P.K. | September 19, 2009 | 90 |
| 76 | P.K. | October 5, 2009 | 90 |
| 77 | P.K. | October 23, 2009 | 90 |
| 78 | J.W. | March 31, 2006 | 90 |
| 79 | J.W. | April 24, 2006 | 90 |
| 80 | J.W. | May 8, 2006 | 90 |
| 81 | J.W. | June 2, 2006 | 90 |
| 82 | J.W. | June 26, 2006 | 90 |
| 83 | J.W. | August 3, 2006 | 90 |
| 84 | J.W. | August 21, 2006 | 90 |
| 85 | J.W. | September 8, 2006 | 90 |
| 86 | J.W. | September 29, 2006 | 90 |
| 87 | J.W. | October 20, 2006 | 90 |
| 88 | J.W. | July 5, 2007 | 90 |
| 89 | J.W. | August 2, 2007 | 90 |
| 90 | J.W. | September 14, 2007 | 90 |
| 91 | J.W. | November 1, 2007 | 90 |
| 92 | J.W. | December 17, 2007 | 90 |
| 93 | J.W. | February 15, 2008 | 90 |
| 94 | J.W. | March 20, 2008 | 90 |
| 95 | J.W. | April 24, 2008 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg Tablets |
| :---: | :---: | :---: | :---: |
| 96 | J.W. | May 29, 2008 | 90 |
| 97 | J.W. | June 27, 2008 | 90 |
| 98 | J.W. | August 22, 2008 | 90 |
| 99 | J.W. | September 22, 2008 | 90 |
| 100 | J.W. | October 20, 2008 | 90 |
| 101 | J.W. | November 20, 2008 | 90 |
| 102 | J.W. | December 19, 2008 | 90 |
| 103 | J.W. | January 16, 2009 | 90 |
| 104 | J.W. | February 13, 2009 | 90 |
| 105 | J.W. | March 12, 2009 | 90 |
| 106 | J.W. | May 29, 2009 | 90 |
| 107 | J.W. | June 19, 2009 | 90 |
| 108 | J.W. | July 13, 2009 | 90 |
| 109 | K.K. | March 30, 2006 | 90 |
| 110 | K.K. | April 13, 2006 | 90 |
| 111 | K.K. | May 1, 2006 | 90 |
| 112 | K.K. | May 15, 2006 | 90 |
| 113 | K.K. | June 5, 2006 | 90 |
| 114 | K.K. | June 26, 2006 | 90 |
| 115 | K.K. | August 3, 2006 | 90 |
| 116 | K.K. | August 21, 2006 | 90 |
| 117 | K.K. | September 8, 2006 | 90 |
| 118 | K.K. | September 25, 2006 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg Tablets |
| :---: | :---: | :---: | :---: |
| 119 | K.K. | October 12, 2006 | 90 |
| 120 | K.K. | November 13, 2006 | 90 |
| 121 | K.K. | February 15, 2008 | 90 |
| 122 | K.K. | March 14, 2008 | 90 |
| 123 | K.K. | April 17, 2008 | 90 |
| 124 | K.K. | April 24, 2008 | 90 |
| 125 | K.K. | May 22, 2008 | 90 |
| 126 | K.K. | June 23, 2008 | 90 |
| 127 | K.K. | August 25, 2008 | 90 |
| 128 | K.K. | September 25, 2008 | 90 |
| 129 | K.K. | October 24, 2008 | 90 |
| 130 | K.K. | December 1, 2008 | 90 |
| 131 | K.K. | December 29, 2008 | 90 |
| 132 | K.K. | January 26, 2009 | 90 |
| 133 | K.K. | February 19, 2009 | 90 |
| 134 | K.K. | March 16, 2009 | 90 |
| 135 | K.K. | May 8, 2009 | 90 |
| 136 | K.K. | June 19, 2009 | 90 |
| 137 | K.K. | July 17, 2009 | 90 |
| 138 | K.K. | July 24, 2009 | 90 |
| 139 | K.K. | August 14, 2009 | 90 |
| 140 | K.K. | September 11, 2009 | 90 |
| 141 | K.K. | October 1, 2009 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg Tablets |
| :---: | :---: | :---: | :---: |
| 142 | K.K. | October 23, 2009 | 90 |
| 143 | D.H. | April 6, 2006 | 90 |
| 144 | D.H. | April 20, 2006 | 90 |
| 145 | D.H. | May 11, 2006 | 90 |
| 146 | D.H. | June 2, 2006 | 90 |
| 147 | D.H. | June 19, 2006 | 90 |
| 148 | D.H. | July 10, 2006 | 90 |
| 149 | D.H. | July 27, 2006 | 90 |
| 150 | D.H. | August 17, 2006 | 90 |
| 151 | D.H. | September 7, 2006 | 90 |
| 152 | D.H. | September 22, 2006 | 90 |
| 153 | D.H. | October 9, 2006 | 90 |
| 154 | D.H. | December 28, 2006 | 90 |
| 155 | D.H. | April 16, 2007 | 90 |
| 156 | D.H. | July 13, 2007 | 90 |
| 157 | D.H. | August 13, 2007 | 90 |
| 158 | D.H. | September 10, 2007 | 90 |
| 159 | D.H. | October 29, 2007 | 90 |
| 160 | D.H. | December 20, 2007 | 90 |
| 161 | D.H. | January 17, 2008 | 90 |
| 162 | D.H. | February 11, 2008 | 90 |
| 163 | D.H. | April 10, 2008 | 90 |
| 164 | D.H. | May 8, 2008 | 90 |


| Count | "Patient" | Date | Quantity in 5 mg <br> Tablets |
| :--- | :--- | :--- | :--- |
| 165 | D.H. | June 6, 2008 | 90 |
| 166 | D.H. | July 3, 2008 | 90 |
| 167 | D.H. | August 4, 2008 | 90 |
| 168 | D.H. | September 4, 2008 | 90 |
| 169 | D.H. | October 3, 2008 | 90 |
| 170 | D.H. | November 3, 2008 | 90 |
| 171 | D.H. | December 12, 2008 | 90 |
| 172 | D.H. | January 9, 2009 | 90 |
| 173 | D.H. | February 6, 2009 | 90 |
| 174 | D.H. | June 29, 2009 | 90 |

All in violation of Title 21, United States Code, Section 843(a)(3), and Title 18, United States Code, Section 2.

## A TRUE BILL:

GRAND JURY FOREPERSON

## ZANE DAVID MEMEGER <br> United States Attorney

