IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	**CRIMINAL NO: 26-**
v.	:	**DATE FILED:**
JOSEPH P. DIRENZO, JR. **MARC A. MATOZZO** **JOSEPH D. NORRIS**	:	**VIOLATIONS:** **21 U.S.C. § 846 (conspiracy to distribute controlled substances – 1 count)** **21 U.S.C. § 841(a)(1) (distribution of controlled substances – 6 counts)** **18 U.S.C. § 1035 (false statements in health care fraud matters – 1 count)** **18 U.S.C. § 2 (aiding and abetting)** **Notices of forfeiture**

INDICTMENT

COUNT ONE

CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCES
21 U.S.C. § 846

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant JOSEPH P. DIRENZO, JR. was a doctor of osteopathic medicine who held himself out as a family medicine and primary care physician. Defendant DIRENZO was licensed to practice medicine in the Commonwealth of Pennsylvania. Defendant DIRENZO was registered with the Drug Enforcement Administration ("DEA") for the purpose of prescribing controlled substances. Defendant DIRENZO was a co-owner of Philadelphia Family Medicine Associates, P.C. ("PFM"), located at 1028 Oregon Avenue, Philadelphia, Pennsylvania.

2. Defendant MARC A. MATOZZO was a doctor of osteopathic medicine who held himself out as a family medicine and primary care physician. Defendant MATOZZO was licensed to practice medicine in the Commonwealth of Pennsylvania. Defendant

MATOZZO was registered with the DEA for the purpose of prescribing controlled substances. Defendant MATOZZO was also a co-owner of PFM.

3. Defendant JOSEPH D. NORRIS was a licensed physician's assistant who held himself out as a family medicine and primary care provider. Defendant NORRIS was registered with the DEA for the purpose of prescribing controlled substances. Defendant NORRIS was the third co-owner of PFM.

4. From at least in or about January 2020 through in or about March 2025, defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS unlawfully distributed controlled substances, outside the usual course of professional practice and without a legitimate medical purpose.

The Controlled Substances Act

5. The Controlled Substances Act ("CSA") governed the manufacture, distribution, and dispensation of controlled substances in the United States. Under the Controlled Substances Act, there were five schedules of controlled substances: Schedules I, II, III, IV, and V. Controlled substances were scheduled into these levels based upon their potential for abuse, among other things. For example, abuse of Schedule II controlled substances may lead to severe psychological or physical dependence. Abuse of Schedule III controlled substances may lead to moderate or low physical dependence. Abuse of Schedule IV controlled substances may lead to more limited physical dependence or psychological dependence relative to the drugs or other substances in Schedule III.

6. Oxycodone was an opioid medication used to treat severe pain. Oxycodone was a Schedule II controlled substance that has been associated with addiction, abuse, and misuse. Oxycodone can cause life threatening conditions or death, especially if used

in combination with other drugs or alcohol. Oxycodone was sold generically and under a variety of brand names, including OxyContin, Endocet, Xtampza, and Percocet.

7. Amphetamine and dextroamphetamine were stimulants used to treat attention deficit hyperactivity disorder and narcolepsy. Amphetamine and dextroamphetamine were Schedule II controlled substances that have been associated with addiction, abuse, and misuse. Amphetamine and dextroamphetamine were sold generically and under the brand names Adderall, Adderall XR, Dexedrine, Zenzedi, ProCentra, and Myadayis.

8. Title 21, United States Code, Section 841(a)(1), provides that "[e]xcept as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally—(1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute or dispense, a controlled substance."

9. Title 21, United States Code, Section 821, provides that "[t]he Attorney General [of the United States] is authorized to promulgate rules and regulations . . . relating to the registration and control of the manufacture, distribution, and dispensing of controlled substances."

10. The Attorney General of the United States has exercised rulemaking authority regarding the distribution and dispensing of controlled substances through the promulgation of Title 21, Code of Federal Regulations, Section 1306.04, governing the issuance of prescriptions, which provided, among other things, that a prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his or her professional practice. Moreover, an order purporting to be a prescription issued not in the usual course of professional practice is not a prescription within the meaning and intent of section 309 of the Act [21 U.S.C. § 829] and the

person knowingly filling such a purported prescription, as well as the person issuing it, shall be subject to the penalties provided for violation of the law relating to controlled substances.

11. Title 21, Code of Federal Regulations, Section 1306.12(a) prohibits refilling a prescription for a Schedule II controlled substance.

12. The Pennsylvania Code of Professional and Vocational Standards, Title 49, Chapter 16.92, defined the authority of physicians and others licensed by the Commonwealth of Pennsylvania to prescribe or dispense controlled substances. Physician assistants must also comply with Title 49, Chapter 16.92, in accordance with the Pennsylvania Code of Professional and Vocational Standards, Title 49, Chapter 18.158(e).

13. Chapter 16.92[1] provided in pertinent part:

a. A person licensed to practice medicine and surgery in this Commonwealth or otherwise licensed or regulated by the Board of Medicine shall carry out, or cause to be carried out, the following minimum standards:

> 1. *Initial medical history and physician examination*. . . shall be conducted unless emergency circumstances justify otherwise. Medical history and physical examination information recorded by another licensed health care provider may be considered if the medical history was taken and the physical examination was conducted within the immediately preceding 30 days. The physical examination shall include an objective evaluation of the heart, lungs, blood pressure and body functions that relate to the patient's specific complaint.
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> 2. *Reevaluations*. . . of the patient's condition and efficacy of the drug therapy shall be made consistent with the condition diagnosed, the drug or drugs involved, expected results and possible side effects.
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> 3. *Patient counseling* . . . [t]he patient shall be counseled regarding the condition diagnosed and the drug prescribed . . . [including] dosage levels, instructions for use, frequency and duration of use and possible side effects.

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[1] Chapter 16.92 was amended effective December 21, 2024. The text provided below was effective prior to December 21, 2024.

> 4. *Medical records* . . . . [a]ccurate and complete medical records must document the evaluation and care received by patients. (i) On the initial occasion when a [controlled substance] is prescribed . . . the medical record must include . . . [a] specification of the symptoms observed by the licensed health care provider and reported by the patient[,] . . . [t]he diagnosis of the condition for which the [controlled substance] is being given[,] . . . [t]he directions given to the patient for the use of the [controlled substance][,] . . . [and t]he name, strength and quantity of the [controlled substance] and the date on which the [controlled substance] was prescribed[.] . . . (ii) After the initial occasion when a [controlled substance] is prescribed . . . the medical record must include the [name, strength and quantity of the controlled substance and the date on which the controlled substance was prescribed] and changes or additions to [the patient's symptoms, diagnosis, and directions given to the patient for use of the controlled substance].

14. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS were authorized to prescribe to patients Schedules II, III, IV, and V controlled substances only if such prescriptions were issued for a legitimate medical purpose in the usual course of professional practice.

15. From at least in or about January 2020 to in or about March 2025, in the Eastern District of Pennsylvania and elsewhere, defendants

JOSEPH P. DIRENZO, JR.,
MARC A. MATOZZO, and
JOSEPH D. NORRIS

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly and intentionally distribute and dispense by prescribing without a legitimate medical purpose in the usual course of professional practice, mixtures and substances containing detectable amounts of oxycodone and amphetamine, both Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

MANNER AND MEANS

It was part of the conspiracy that:

16. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS owned, controlled, and operated PFM, and became registered with the DEA in order to prescribe Schedule II and other controlled substances.

17. From at least in or about January 2020 to in or about March 2025, the defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS, together with others known and unknown to the grand jury, knowingly and intentionally prescribed Schedule II controlled substances, including oxycodone and amphetamine, outside the usual course of professional practice and without a legitimate medical purpose.

18. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS knowingly and intentionally prescribed Schedule II controlled substances without a routine physical examination and for reasons other than to treat pain.

19. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS issued prescriptions outside the usual course of professional practice and without a legitimate medical purpose with the knowledge that Schedule II controlled substances were addictive and dangerous for their patients. For example, defendant NORRIS stated that oxycodone was “the most addictive medicine on the planet,” that “this medicine is dangerous,” and that “people will kill” for it because of its illegal value in being resold on the street.

20. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS, together with others known and unknown to the grand jury, operated a voicemail refill line that allowed patients to request and receive what were in function and effect refills of Schedule II controlled substance prescriptions without ever interacting with a licensed and registered prescriber, despite knowing that such refills for Schedule II controlled substances are not permitted under federal law.

21. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS knowingly and intentionally issued Schedule II controlled substances prescriptions to PFM patients who used the refill line to receive prescriptions for controlled substances for up to and, in some instances, exceeding one year without interacting with a licensed prescriber.

22. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS were aware that certain pharmacies refused to fill certain of their prescriptions for Schedule II controlled substances because they lacked a legitimate medical purpose and were outside the usual course of professional practice or were dangerous, but defendants DIRENZO, MATOZZO, and NORRIS submitted the refused prescriptions to other pharmacies or submitted those unauthorized prescriptions in the name of another medical professional in order to deceive the pharmacies into filling the prescriptions.

23. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS received notice from pharmacy benefit managers and insurers that the defendants had prescribed dangerous amounts of Schedule II controlled substances and dangerous combinations of controlled substances and other medications, but continued to prescribe outside the usual course of professional practice and without a legitimate medical purpose.

24. Some patients who used the refill line to obtain Schedule II controlled substance prescriptions from defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS suffered drug overdoses and died. While defendants DIRENZO, MATOZZO, and NORRIS learned of the overdoses and deaths, defendants DIRENZO, MATOZZO, and NORRIS continued to utilize the refill line to prescribe Schedule II controlled

substances outside the usual course of professional practice and without a legitimate medical purpose.

25. Defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS concealed and disguised the conspiracy, including by falsifying and causing the falsification of patient records and other documents.

OVERT ACTS

In furtherance of the conspiracy, defendants JOSEPH P. DIRENZO, JR., MARC A. MATOZZO, and JOSEPH D. NORRIS, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about September 27, 2021, in Philadelphia, defendant JOSEPH P. DIRENZO, JR. prescribed, and therefore distributed and dispensed, approximately 120 oxycodone 15 mg pills to Patient 1, a person known to the grand jury.

2. On or about November 1, 2023, in Philadelphia, defendant JOSEPH P. DIRENZO, JR. prescribed, and therefore distributed and dispensed, approximately 120 oxycodone 30 mg pills to Patient 2, a person known to the grand jury.

3. On or about March 1, 2024, in Philadelphia, defendant JOSEPH D. NORRIS prescribed, and therefore distributed and dispensed, approximately 20 oxycodone 5 mg pills to Patient 3, a person known to the grand jury.

4. On or about November 22, 2024, in Philadelphia, defendant MARC A. MATOZZO prescribed, and therefore distributed and dispensed, approximately 120 oxycodone 15 mg pills to Patient 4, a person known to the grand jury.

5. On or about January 10, 2025, in Philadelphia, defendant MARC A. MATOZZO prescribed, and therefore distributed and dispensed, approximately 120 oxycodone 15 mg to Patient 4, a person known to the grand jury.

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

COUNTS TWO THROUGH THREE

DISTRIBUTION OF SCHEDULE II CONTROLLED SUBSTANCES
21 U.S.C. § 841(a)(1)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 14 and 16 through 26 of Count One are incorporated herein.

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

MARC A. MATOZZO

knowingly and intentionally prescribed, and therefore distributed and dispensed, and aided and abetted the distribution and dispensing, outside the usual course of professional practice and for no legitimate medical purpose, a mixture and substance containing a detectable amount of a Schedule II controlled substance (each distribution constituting a separate count of this indictment):

COUNT	PATIENT	APPROX. DATE OF PRESCRIPTION	SUBSTANCE	QUANTITY
Two	Patient 4	November 22, 2024	Oxycodone (15 mg)	120
Three	Patient 4	January 10, 2025	Oxycodone (15 mg)	120

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNTS FOUR THROUGH FIVE

DISTRIBUTION OF SCHEDULE II CONTROLLED SUBSTANCES
21 U.S.C. § 841(a)(1)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 14 and 16 through 26 of Count One are incorporated herein.

2. On or about each of the dates listed below, in the Eastern District of Pennsylvania, defendant

JOSEPH D. NORRIS

knowingly and intentionally prescribed, and therefore distributed and dispensed, and aided and abetted the distribution and dispensing, outside the usual course of professional practice and for no legitimate medical purpose, a mixture and substance containing a detectable amount of a Schedule II controlled substance (each distribution constituting a separate count of this indictment):

COUNT	PATIENT	APPROX. DATE OF PRESCRIPTION	SUBSTANCE	QUANTITY
Four	Patient 3	March 1, 2024	Oxycodone (5 mg)	20
Five	Patient 3	April 2, 2024	Oxycodone (5 mg)	20

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNTS SIX THROUGH SEVEN

DISTRIBUTION OF SCHEDULE II CONTROLLED SUBSTANCES
21 U.S.C. § 841(a)(1)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 14 and 16 through 26 of Count One are incorporated here.

2. On or about each of the dates listed below, in the Eastern District of Pennsylvania, defendant

JOSEPH P. DIRENZO, JR.

knowingly and intentionally prescribed, and therefore distributed and dispensed, and aided and abetted the distribution and dispensing, outside the usual course of professional practice and for no legitimate medical purpose, a mixture and substance containing a detectable amount of a Schedule II controlled substance (each distribution constituting a separate count of this indictment):

COUNT	PATIENT	APPROX. DATE OF PRESCRIPTION	SUBSTANCE	QUANTITY
Six	Patient 1	September 27, 2021	Oxycodone (15 mg)	120
Seven	Patient 2	November 1, 2023	Oxycodone (30 mg)	120

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHT

FALSE STATEMENTS RELATING TO HEALTH CARE MATTERS
18 U.S.C. § 1035

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 4 of Count One are incorporated here.

2. The Medicare Program ("Medicare") was a federal health care program providing benefits to persons who were at least 65 years old or disabled.

3. Medicare was a "health care benefit program" as defined in Title 18, United States Code, Section 24(b).

4. On or about March 1, 2024, in the Eastern District of Pennsylvania, defendant

JOSEPH D. NORRIS

falsified, concealed, and covered up by trick, scheme, and device material facts, and made one or more materially false, fictitious, and fraudulent statements and representations, and made and used one or more materially false writings and documents knowing the same to contain one or more materially false, fictitious, and fraudulent statements and entries, in connection with the delivery of and payment for health care benefits, items, and services, in that defendant NORRIS caused false statements to be placed in the medical record of a patient in order to justify the prescription for that patient of Schedule II controlled substances, including the false statement that the patient had complained of excessive amounts of pain during a medical appointment when defendant NORRIS knew that representation to be false because the patient had actually denied experiencing any pain.

In violation of Title 18, United States Code, Section 1035.

NOTICE OF FORFEITURE #1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1035, set forth in this indictment, defendant

JOSEPH D. NORRIS

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of such offenses.

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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(7).

NOTICE OF FORFEITURE #2

THE GRAND JURY FURTHER CHARGES THAT:

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

JOSEPH P. DIRENZO, JR.,
MARC A. MATOZZO, and
JOSEPH D. NORRIS

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 violation; and

(b) any property constituting, or derived from, proceeds obtained, directly or indirectly, from the commission of such violation.

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

(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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

[redacted]

Salvatore L. Astolfi for
DAVID METCALF
UNITED STATES ATTORNEY

LORINDA LARYEA
Chief
Criminal Division, Fraud Section

*No.*__________

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOSEPH P. DIRENZO, JR.,
MARC A. MATOZZO, and
JOSEPH D. NORRIS

INDICTMENT

21 U.S.C. § 846 (conspiracy to distribute controlled substances – 1 count)
21 U.S.C. § 841(a)(1) (distribution of controlled substances – 6 counts)
18 U.S.C. § 1035 (false statements in health care fraud matters – 1 count)
18 U.S.C. § 2 (aiding and abetting)

[redacted]

Bail, $__________