

DJF:JJT:nl

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 v.)
)
 HEATHER AMANDA WOLFE,)
 MEGAN NICO BERGSTRESSER,)
 AMY BETH JONES, and)
 JOSEPH BENJAMIN SHATTO,)
)
 Defendants.)

CRIM. NO. 1:18-cr-197.
(*Quas*, J.)

FILED
HARRISBURG, PA

JUN 20 2018

INDICTMENT

COUNT 1

Per *AAA*
Deputy Clerk

CONSPIRACY TO VIOLATE TITLE 21, U.S.C. SECTION 843
(Title 21, United States Code, Section 846)

THE GRAND JURY CHARGES:

1. From on or about December 23, 2016, to on or about August 23, 2017, in the Middle District of Pennsylvania, the defendants,

HEATHER AMANDA WOLFE,
MEGAN NICO BERGSTRESSER,
AMY BETH JONES,

and

JOSEPH BENJAMIN SHATTO,

knowingly and intentionally conspired, confederated, and agreed with persons known and unknown to the Grand Jury to knowingly and

intentionally acquire and possess Oxycodone and Hydrocodone, both are Schedule II controlled substances, by means of misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

In violation of Title 21, United States Code, Section 846.

COUNTS 2 THROUGH 13ACQUIRING OR OBTAINING A CONTROLLED SUBSTANCE
BY MISREPRESENTATION, FRAUD, FORGERY,
DECEPTION, SUBTERFUGE(Title 21, United States Code, Section 843(a)(3))

THE GRAND JURY FURTHER CHARGES:

2. From on or about January 31, 2017, to on or about August 15, 2017, in the Middle District of Pennsylvania, the defendant,

HEATHER AMANDA WOLFE,

knowingly and intentionally acquired and obtained possession of Oxycodone, a Schedule II controlled substance, by means of misrepresentation, fraud, forgery, deception and subterfuge as set for below:

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>
2	01/31/2017	Heather Amanda Wolfe	Oxycodone
3	06/05/2017	Heather Amanda Wolfe	Oxycodone
4	06/13/2017	Heather Amanda Wolfe	Oxycodone
5	06/22/2017	Heather Amanda Wolfe	Oxycodone
6	06/28/2017	Heather Amanda Wolfe	Oxycodone
7	07/03/2017	Heather Amanda Wolfe	Oxycodone

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>
8	07/18/2017	Heather Amanda Wolfe	Oxycodone
9	07/25/2017	Heather Amanda Wolfe	Oxycodone
10	08/01/2017	Heather Amanda Wolfe	Oxycodone
11	08/08/2017	Heather Amanda Wolfe	Oxycodone
12	08/08/2017	Joseph Benjamin Shatto	Oxycodone
13	08/18/2017	Heather Amanda Wolfe	Oxycodone

In violation of Title 21, United States Code, Section 843(a)(3).

COUNTS 14 THROUGH 20ACQUIRING OR OBTAINING A CONTROLLED SUBSTANCE
BY MISREPRESENTATION, FRAUD, FORGERY,
DECEPTION, SUBTERFUGE(Title 21, United States Code, Section 843(a)(3))

THE GRAND JURY FURTHER CHARGES:

3. From on or about January 24, 2017, to on or about July 24, 2017, in the Middle District of Pennsylvania, the defendant,

AMY BETH JONES,

knowingly and intentionally acquired and obtained possession of Oxycodone, a Schedule II controlled substance, by means of misrepresentation, fraud, forgery, deception and subterfuge as set for below:

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>
14	01/24/2017	Amy Beth Jones	Oxycodone
15	02/08/2017	Amy Beth Jones	Oxycodone
16	04/10/2017	Amy Beth Jones	Oxycodone
17	04/28/2017	Amy Beth Jones	Oxycodone
18	05/08/2017	Amy Beth Jones	Oxycodone
19	06/15/2017	Amy Beth Jones	Oxycodone

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>
20	07/24/2017	Amy Beth Jones	Oxycodone

In violation of Title 21, United States Code, Section 843(a)(3).

COUNTS 21 THROUGH 32ACQUIRING OR OBTAINING A CONTROLLED SUBSTANCE
BY MISREPRESENTATION, FRAUD, FORGERY,
DECEPTION, SUBTERFUGE(Title 21, United States Code, Section 843(a)(3))

THE GRAND JURY FURTHER CHARGES:

4. From on or about December 23, 2016, to on or about August 23, 2017, in the Middle District of Pennsylvania, the defendant,

JOSEPH BENJAMIN SHATTO,

knowingly and intentionally acquired and obtained possession of

Oxycodone, a Schedule II controlled substance, by means of

misrepresentation, fraud, forgery, deception and subterfuge as set for

below:

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>
21	12/23/2016	Joseph Benjamin Shatto	Oxycodone
22	01/04/2017	Joseph Benjamin Shatto	Oxycodone
23	02/08/2017	Joseph Benjamin Shatto	Oxycodone
24	04/06/2017	Joseph Benjamin Shatto	Oxycodone
25	05/24/2017	Joseph Benjamin Shatto	Oxycodone
26	06/01/2017	Joseph Benjamin Shatto	Oxycodone

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>
27	06/16/2017	Joseph Benjamin Shatto	Oxycodone
28	06/27/2017	Joseph Benjamin Shatto	Oxycodone
29	07/24/2017	Joseph Benjamin Shatto	Oxycodone
30	08/02/2017	Joseph Benjamin Shatto	Oxycodone
31	08/15/2017	Joseph Benjamin Shatto	Oxycodone
32	08/23/2017	Joseph Benjamin Shatto	Oxycodone

In violation of Title 21, United States Code, Section 843(a)(3).

COUNTS 33 THROUGH 41FALSE AND FRAUDULENT STATEMENTS IN CONNECTION
WITH PAYMENT OF HEALTH CARE BENEFITS
(Title 18, United States Code, Section 1035)**THE GRAND JURY FURTHER CHARGES:**

5. From on or about January 31, 2017, to on or about August 15, 2017, in the Middle District of Pennsylvania, the defendant,

HEATHER AMANDA WOLFE,

knowingly and willfully made materially false, fictitious and fraudulent statements and representations and made and used materially false writings and documents knowing the same to contain materially false, fictitious and fraudulent statements and entries in connection with payment for health care benefits, items, and services:

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>	<u>Insurance Claim Submitted to:</u>
33	01/31/2017	Heather Amanda Wolfe	Oxycodone	Medicaid
34	06/13/2017	Heather Amanda Wolfe	Oxycodone	Medicaid
35	06/23/2017	Heather Amanda Wolfe	Oxycodone	Medicaid
36	07/03/2017	Heather Amanda Wolfe	Oxycodone	Medicaid

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>	<u>Insurance Claim Submitted to:</u>
37	07/19/2017	Heather Amanda Wolfe	Oxycodone	Medicaid
38	07/25/2017	Heather Amanda Wolfe	Oxycodone	Medicaid
39	08/02/2017	Heather Amanda Wolfe	Oxycodone	Medicaid
40	08/08/2017	Heather Amanda Wolfe	Oxycodone	Medicaid
41	08/15/2017	Heather Amanda Wolfe	Oxycodone	Medicaid

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

COUNTS 42 THROUGH 44FALSE AND FRAUDULENT STATEMENTS IN CONNECTION
WITH PAYMENT OF HEATH CARE BENEFITS(Title 18, United States Code, Section 1035)

THE GRAND JURY FURTHER CHARGES:

6. From on or about August 9, 2017, to on or about August 23, 2017, in the Middle District of Pennsylvania, the defendant,

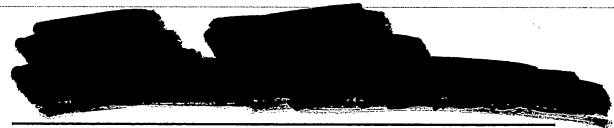
JOSEPH BENJAMIN SHATTO,

knowingly and willfully made materially false, fictitious and fraudulent statements and representations and made and used materially false writings and documents knowing the same to contain materially false, fictitious and fraudulent statements and entries in connection with payment for health care benefits, items, and services:

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>	<u>Insurance Claim Submitted to:</u>
42	08/09/2017	Joseph Benjamin Shatto	Oxycodone	Medicare
43	08/15/2017	Joseph Benjamin Shatto	Oxycodone	Medicare
44	08/23/2017	Joseph Benjamin Shatto	Oxycodone	Medicare

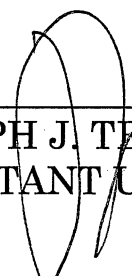
In violation of Title 18, United States Code, Section 1035.

A TRUE BILL

A large black rectangular redaction covering a signature.

FOREPERSON, GRAND JURY

DAVID J. FREED
UNITED STATES ATTORNEY

By:  _____
JOSEPH J. TERZ
ASSISTANT U.S. ATTORNEY

6/20/18
DATE