

DJF:JJT:nl

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

UNITED STATES OF AMERICA)	CRIM. NO. 1:18-cr-196.
)	
v.)	
)	
PAULINE M. WOLFE,)	(Law. , J.)
BRUCE A. GREENWALD, and)	
ANGELA L. GREENWALD,)	
)	
Defendants.)	

FILED
HARRISBURG, PA

JUN 20 2018

Per AAA
Deputy Clerk

INDICTMENT

COUNT 1

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 9, 2016, to on or about June 12, 2017, in the Middle District of Pennsylvania, the defendants,

PAULINE M. WOLFE,

BRUCE A. GREENWALD,

and

ANGELA L. GREENWALD,

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 20

ACQUIRING 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 27, 2017, to on or about June 19, 2017, in the Middle District of Pennsylvania, the defendant,

PAULINE M. 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	01/27/2017	S.H.	Oxycodone
3	05/03/2017	H.G.	Oxycodone
4	05/13/2017	H.G.	Oxycodone
5	05/28/2017	H.G.	Oxycodone
6	06/04/2017	H.G.	Oxycodone
7	06/12/2017	H.G.	Oxycodone

<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>
8	06/24/2017	H.G.	Oxycodone
9	07/09/2017	H.G.	Oxycodone
10	07/17/2017	H.G.	Oxycodone
11	07/29/2017	H.G.	Oxycodone
12	08/05/2017	H.G.	Oxycodone
13	08/12/2017	H.G.	Oxycodone
14	12/17/2016	P.S.	Oxycodone
15	12/27/2016	P.S.	Oxycodone
16	01/18/2017	H.H.	Oxycodone
17	08/23/2017	H.G.	Oxycodone
18	02/06/2017	P.S.	Oxycodone
19	05/25/2017	P.F.	Oxycodone
20	06/19/2017	P.F.	Oxycodone

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

COUNTS 21 THROUGH 25

ACQUIRING 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 December 9, 2016, to on or about January 24, 2017, in the Middle District of Pennsylvania, the defendant,

BRUCE A. GREENWALD,

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	12/09/2016	Bruce A. Greenwald	Oxycodone
22	12/21/2016	Bruce A. Greenwald	Oxycodone
23	01/02/2017	Bruce A. Greenwald	Oxycodone
24	01/12/2017	Bruce A. Greenwald	Oxycodone
25	01/24/2017	Bruce A. Greenwald	Oxycodone

COUNTS 26 THROUGH 39

FALSE AND FRAUDULENT STATEMENTS IN CONNECTION
WITH PAYMENT OF HEALTH CARE BENEFITS
(Title 18, United States Code, Section 1035)

THE GRAND JURY FURTHER CHARGES:

4. From on or about June 18, 2017, to on or about February 23, 2017, in the Middle District of Pennsylvania, the defendant,

PAULINE M. 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>
26	06/18/2017	P.F.	Oxycodone	Medicaid
27	01/27/2017	S.H.	Oxycodone	Medicaid
28	05/03/2017	H.G.	Oxycodone	Medicaid
29	05/13/2017	H.G.	Oxycodone	Medicaid

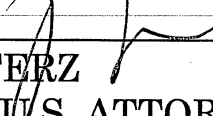
<u>Count No.</u>	<u>Date Submitted</u>	<u>Patient Name on Prescription</u>	<u>Drug</u>	<u>Insurance Claim Submitted to:</u>
30	05/28/2017	H.G.	Oxycodone	Medicaid
31	06/04/2017	H.G.	Oxycodone	Medicaid
32	06/12/2017	H.G.	Oxycodone	Medicaid
33	06/24/2017	H.G.	Oxycodone	Medicaid
34	07/09/2017	H.G.	Oxycodone	Medicaid
35	07/17/2017	H.G.	Oxycodone	Medicaid
36	07/29/2017	H.G.	Oxycodone	Medicaid
37	08/05/2017	H.G.	Oxycodone	Medicaid
38	08/12/2017	H.G.	Oxycodone	Medicaid
39	02/23/2017	H.H.	Oxycodone	Medicare

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

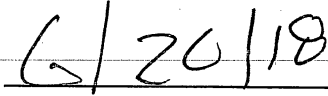
A TRUE BILL


FOREPERSON, GRAND JURY

DAVID J. FREED
UNITED STATES ATTORNEY

By: 

JOSEPH J. TERZ
ASSISTANT U.S. ATTORNEY



DATE