

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13-
v.	:	DATE FILED: October 23, 2013
LEON LITTLE,	:	VIOLATIONS:
a/k/a “Bo,”	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a “Lebo,”	:	controlled substances - 1 count)
a/k/a “Big Homey,”	:	21 U.S.C. § 841(a)(1) (distribution of
COLISE HARMON,	:	oxycodone - 24 counts)
a/k/a “Khali,”	:	21 U.S.C. § 843(a)(3) (acquiring a
HEATHER HERZSTEIN	:	controlled substance by fraud - 9 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

BACKGROUND

1. The Controlled Substances Act governs the manufacture, distribution, and dispensing of controlled substances in the United States. Under the Controlled Substances Act, there are five schedules of controlled substances – Schedules I, II, III, IV, and V. Controlled substances are scheduled into these levels based upon their potential for abuse or dependence, among other things. Schedule I contains the most dangerous drugs that have the highest potential for abuse or dependence, and Schedule V contains the least dangerous controlled substances.

2. Oxycodone is a narcotic analgesic that is similar to morphine and is classified as a Schedule II controlled substance, sometimes prescribed under the brand name

Oxycontin. Oxycodone is used to treat severe pain, and, even if taken only in prescribed amounts, can cause physical and psychological dependence when taken for a long time. Oxycodone is used in pain relief drugs in varying strengths, including 5, 10, 30, 40, 60, and 80 milligram amounts. For example, Percocet is manufactured by numerous pharmaceutical companies under the following brand names: Endocet, Roxicet, Roxilox and Tylox. Percocet, which contains 10 milligrams of oxycodone, is used to treat moderate to moderately severe pain, and contains two drugs, oxycodone and acetaminophen. Even if taken only in prescribed amounts, pills containing amounts as low as 10 milligrams of oxycodone can cause physical and psychological dependence when taken for a long time.

THE CONSPIRACY

3. From in or about August 2010 through in or about April 2012, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,
a/k/a "Bo,"
a/k/a "Lebo,"
a/k/a "Big Homey,"
COLISE HARMON,
a/k/a "Khali," and
HEATHER HERZSTEIN**

conspired and agreed with others known and unknown to the grand jury, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and alprazolam, a Schedule IV controlled substance, 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:

4. Defendant LEON LITTLE ran the LITTLE DRUG OPERATION (LDO) that operated in Philadelphia, Pennsylvania and distributed oxycodone and alprazolam in Philadelphia, Pennsylvania.

5. The LDO recruited individuals known and unknown to the grand jury to pose as legitimate patients (hereinafter referred to as "pseudo-patient") and obtain prescriptions for controlled substances, specifically, pills containing oxycodone, a Schedule II controlled substance, and alprazolam, a Schedule IV controlled substance.

6. The LDO scheduled appointments for pseudo-patients at the medical office of L.B., a licensed physician known to the grand jury, located in Philadelphia, Pennsylvania.

7. The LDO transported pseudo-patients to and/or from L.B.'s medical office and various pharmacies in Philadelphia, Pennsylvania so they could obtain oxycodone and alprazolam tablets.

8. The LDO paid the office visit charges at L.B.'s medical office and the costs for the prescriptions at the pharmacies for the pseudo-patients. The LDO also paid the pseudo-patients for obtaining and transferring the oxycodone and alprazolam tablets to LDO associates.

9. The LDO procured prescriptions for oxycodone using L.B.'s prescription pad and without L.B.'s consent. The LDO distributed the forged prescriptions to pseudo-patients and paid the costs for the forged prescriptions at the pharmacies for the pseudo-patients. The LDO also paid the pseudo-patients for obtaining and transferring the oxycodone to LDO associates.

10. After collecting the pills from the pseudo-patients, the LDO counted and packaged the pills for redistribution and sold the pills to others.

11. Defendant LEON LITTLE was assisted in the operation of the LDO by the following conspirators, and others known and unknown to the grand jury:

a Defendant COLISE HARMON transported pseudo-patients to and/or from L.B.'s medical office and various pharmacies, provided money to pseudo-patients to pay for charges at L.B.'s medical office and the costs for the prescriptions at the pharmacies, and paid pseudo-patients for obtaining and transferring oxycodone and alprazolam tablets to the LDO. Defendant HARMON also pretended to be a pseudo-patient and obtained oxycodone tablets through the use of prescriptions that he obtained from L.B. and others.

b. Defendant HEATHER HERZSTEIN scheduled appointments for pseudo-patients at the medical office of L.B. Defendant HERZSTEIN also prepared prescriptions for oxycodone using L.B.'s prescription pad and without L.B.'s consent and distributed the forged prescriptions to the LDO. Defendant HERZSTEIN falsely verified with pharmacies that the forged prescriptions received from LDO pseudo-patients were legitimate.

12. Defendant LEON LITTLE paid defendants COLISE HARMON and HEATHER HERZSTEIN a fee for their participation in the scheduling, transportation and/or coordination of pseudo-patients.

13. Defendant LEON LITTLE used residences to meet with LDO associates, and to collect, process, store or distribute narcotics.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants LEON LITTLE, COLISE HARMON, HEATHER HERZSTEIN, 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 the dates listed in the chart below, at various pharmacies throughout Philadelphia, defendant LEON LITTLE obtained oxycodone tablets, in the dosages and quantities listed below, through the use of prescriptions that he obtained from L.B. and defendant HEATHER HERZSTEIN, each date constituting a separate overt act, and, after obtaining the oxycodone tablets, re-distributed the oxycodone tablets:

<i>Overt Act</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
A	8/3/2010	N40292	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/3/2010	N40293	80 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
B	10/8/2010	2585328	10 mg	120	Philly Pharmacy, 210 Market Street
	10/8/2010	2585329	30 mg	120	Philly Pharmacy, 210 Market Street
C	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	2586496	10 mg	120	Philly Pharmacy, 210 Market Street
	11/1/2010	2586495	30 mg	120	Philly Pharmacy, 210 Market Street
D	12/2/2010	550925	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/2/2010	550924	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
E	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

F	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	554965	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/30/2010	554966	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
G	1/27/2011	559366	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	559367	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
H	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	566766	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	3/14/2011	566765	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
I	4/18/2011	572848	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	4/18/2011	572846	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.

2. On or about the dates listed in the chart below, at various pharmacies throughout Philadelphia, defendant COLISE HARMON obtained oxycodone tablets, in the dosages and quantities listed below, through the use of prescriptions that he obtained from L.B. and others, each date constituting a separate overt act, and, after obtaining the oxycodone tablets, distributed the oxycodone tablets to defendant LEON LITTLE or one of defendant LITTLE's workers for re-distribution:

<i>Overt Act</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
A	8/10/2010	N40850	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/10/2010	N40849	80 mg	130	Northeast Pharmacy, 6730 Bustleton Ave.
B	10/11/2010	N46134	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	10/11/2010	N46133	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
C	11/1/2010	N47962	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47963	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
D	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street
E	11/29/2010	2588085	10 mg	120	Philly Pharmacy, 210 Market Street
	11/29/2010	2588086	30 mg	120	Philly Pharmacy, 210 Market Street
F	11/30/2010	N50436	30 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
G	12/2/2010	N50637	10 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
H	12/8/2010	551742	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/8/2010	551741	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
I	12/27/2010	554563	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/27/2010	554564	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
J	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
K	12/29/2010	2589405	30 mg	120	Philly Pharmacy, 210 Market Street

L	1/24/2011	558953	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/24/2011	558952	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
M	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
N	1/27/2011	2591079	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591078	30 mg	120	Philly Pharmacy, 210 Market Street
O	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	563980	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	563979	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	2592710	10 mg	120	Philly Pharmacy, 210 Market Street
	2/25/2011	2592709	30 mg	180	Philly Pharmacy, 210 Market Street

3. On or about the dates listed in the chart below, defendant LEON LITTLE obtained oxycodone tablets, in the dosages and quantities listed below, through the use of the forged prescriptions obtained from defendant HEATHER HERZSTEIN, with each date constituting a separate overt act:

<i>Overt Act</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
A	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
B	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

C	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
D	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
E	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

4. On or about the dates listed in the chart below, defendant COLISE

HARMON obtained oxycodone tablets, in the dosages and quantities listed below, through the use of the forged prescriptions obtained from defendants LEON LITTLE and HEATHER

HERZSTEIN, with each date constituting a separate overt act:

<i>Overt Act</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
A	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street
B	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
C	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
D	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

5. On or about March 13, 2012, at the instruction of defendant LEON LITTLE, J.A., a person known to the grand jury, met with J.B., a person known to the grand jury, to transfer narcotics obtained by pseudo-patients of the LDO who J.A. had transported from L.B.'s medical office to a pharmacy.

On or about March 15, 2012:

6. At the instruction of defendant LEON LITTLE, J.A. met with J.B. to transfer narcotics obtained by pseudo-patients of the LDO who J.A. had transported from L.B.'s medical office to and from a pharmacy.

7. At the direction of defendant LEON LITTLE, J.A. transferred to J.B. approximately 330 pills each containing 30 milligrams of oxycodone, a Schedule II narcotic, 160 pills each containing 10 milligrams of oxycodone, a Schedule II narcotic, 57 pills each containing alprazolam, a Schedule IV narcotic, and the pill bottles in the names of pseudo-patients, E.J. and A.M., persons known to the grand jury.

On or about April 2, 2012:

8. At the instruction of defendant LEON LITTLE, J.A. met with J.B. to transfer narcotics obtained by pseudo-patients of the LDO who J.A. had transported from L.B.'s medical office to and from a pharmacy.

9. J.A. transferred to J.B. approximately 120 pills each containing 30 milligrams of oxycodone, a Schedule II narcotic, and 120 pills each containing 10 milligrams of oxycodone, a Schedule II narcotic, and the pill bottles in the name of pseudo-patient, C.T., a person known to the grand jury.

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

COUNTS TWO THROUGH TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about each of the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,
a/k/a "Bo,"
a/k/a "Lebo,"
a/k/a "Big Homey," and
HEATHER HERZSTEIN**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in the dosages and quantities specified below, with each date constituting a separate count:

<i>Count</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
2	8/3/2010	N40292	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/3/2010	N40293	80 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
3	10/8/2010	2585328	10 mg	120	Philly Pharmacy, 210 Market Street
	10/8/2010	2585329	30 mg	120	Philly Pharmacy, 210 Market Street
4	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	2586496	10 mg	120	Philly Pharmacy, 210 Market Street
	11/1/2010	2586495	30 mg	120	Philly Pharmacy, 210 Market Street
5	12/2/2010	550925	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/2/2010	550924	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.

6	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
7	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	554965	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	554966	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
8	1/27/2011	559366	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	559367	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
9	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	566766	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	566765	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
10	4/18/2011	572848	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	4/18/2011	572846	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.

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

COUNTS ELEVEN THROUGH FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about each of the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,
a/k/a "Bo,"
a/k/a "Lebo,"
a/k/a "Big Homey," and
HEATHER HERZSTEIN**

knowingly and intentionally acquired, and aided and abetted the acquisition of, oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, that is, defendants LITTLE and HERZSTEIN presented, and aided and abetted the presentation of, fraudulent prescriptions for oxycodone tablets in the dosages and quantities specified below, which were created without the knowledge or permission of the physician to whom the prescriptions were attributed and signed with forgeries of the physician's signature, with each date constituting a separate count:

<i>Count</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
11	11/1/2010	N47974	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47973	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
12	12/13/2010	N51764	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/13/2010	N51765	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
13	12/30/2010	N53272	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/30/2010	N53273	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

14	1/27/2011	2591086	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591085	30 mg	120	Philly Pharmacy, 210 Market Street
15	3/14/2011	N60371	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	3/14/2011	N60370	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

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

United States Code, Section 2.

COUNTS SIXTEEN THROUGH THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

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

**LEON LITTLE,
a/k/a "Bo,"
a/k/a "Lebo,"
a/k/a "Big Homey,"
COLISE HARMON,
a/k/a "Khali," and
HEATHER HERZSTEIN**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in the dosages and quantities specified below, with each date constituting a separate count:

<i>Count</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
16	8/10/2010	N40850	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	8/10/2010	N40849	80 mg	130	Northeast Pharmacy, 6730 Bustleton Ave.
17	10/11/2010	N46134	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	10/11/2010	N46133	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
18	11/1/2010	N47962	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	11/1/2010	N47963	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
19	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street

20	11/29/2010	2588085	10 mg	120	Philly Pharmacy, 210 Market Street
	11/29/2010	2588086	30 mg	120	Philly Pharmacy, 210 Market Street
21	11/30/2010	N50436	30 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
22	12/2/2010	N50637	10 mg	135	Northeast Pharmacy, 6730 Bustleton Ave.
23	12/8/2010	551742	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/8/2010	551741	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
24	12/27/2010	554563	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	12/27/2010	554564	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
25	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
26	12/29/2010	2589405	30 mg	120	Philly Pharmacy, 210 Market Street
27	1/24/2011	558953	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	1/24/2011	558952	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
28	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
29	1/27/2011	2591079	10 mg	120	Philly Pharmacy, 210 Market Street
	1/27/2011	2591078	30 mg	120	Philly Pharmacy, 210 Market Street

30	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	563980	10 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	563979	30 mg	120	Pharmacy of America, 1500 E. Erie Ave.
	2/25/2011	2592710	10 mg	120	Philly Pharmacy, 210 Market Street
	2/25/2011	2592709	30 mg	180	Philly Pharmacy, 210 Market Street

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

COUNTS THIRTY-ONE THROUGH THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about each of the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LEON LITTLE,
a/k/a "Bo,"
a/k/a "Lebo,"
a/k/a "Big Homey,"
COLISE HARMON,
a/k/a "Khali," and
HEATHER HERZSTEIN**

knowingly and intentionally acquired, and aided and abetted the acquisition of, oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, that is, defendants LITTLE, HARMON and HERZSTEIN presented, and aided and abetted the presentation of, fraudulent prescriptions for oxycodone tablets in the dosages and quantities specified below, which were created without the knowledge or permission of the physician to whom the prescriptions were attributed and signed with forgeries of the physician's signature, with each date constituting a separate count:

<i>Count</i>	<i>Date</i>	<i>Rx Number</i>	<i>Dosage</i>	<i>Quantity</i>	<i>Location</i>
31	11/2/2010	2586553	10 mg	120	Philly Pharmacy, 210 Market Street
	11/2/2010	2586552	30 mg	120	Philly Pharmacy, 210 Market Street
32	12/28/2010	N53006	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	12/28/2010	N53005	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
33	1/25/2011	N55738	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	1/25/2011	N55737	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

34	2/25/2011	N58756	10 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.
	2/25/2011	N58757	30 mg	120	Northeast Pharmacy, 6730 Bustleton Ave.

All in violation of Title 21, United States Code, Section 843(a)(3), 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 846, 841(a)(1) and 843(a)(3), set forth in this Indictment, defendants

**LEON LITTLE,
a/k/a "Bo,"
a/k/a "Lebo,"
a/k/a "Big Homey,"
COLISE HARMON,
a/k/a "Khali," and
HEATHER HERZSTEIN**

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, but not limited to:

- (1) \$3,004,147.50,
- (2) a 2010 Can-Am Spyder, VIN: 2BXJAKA18AV000122; and
- (3) a 2011 Dodge Ram 1500, VIN: 1D7RV1CT5BS603222.

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

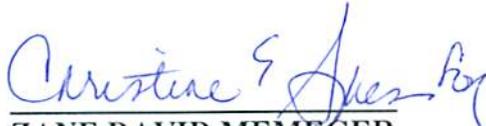
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(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 defendant(s) up to the value of the property subject to forfeiture.

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

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney