

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 13-
 :
 CAROL KOUNITZ : 21 U.S.C. § 846
 :

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. Defendant CAROL KOUNITZ was an associate of CHARLES HALL, III and STEPHANIE LIMA.
2. JOSEPH A. GIORGIANNI was an associate of CHARLES HALL, III and oversaw the distribution of oxycodone-based pain pills obtained by CAROL KOUNITZ, CHARLES HALL, III, and STEPHANIE LIMA.
3. From in or about August 2011 to in or about September 2011, in Mercer and Essex Counties, in the District of New Jersey, and elsewhere, defendant

CAROL KOUNITZ

did knowingly and intentionally conspire with CHARLES HALL, III, STEPHANIE LIMA, JOSEPH A. GIORGIANNI and others to distribute and to possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

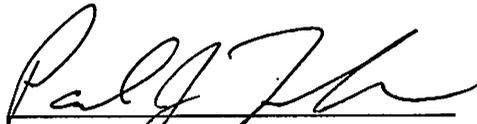
4. It was part of the conspiracy that defendant CAROL KOUNITZ and STEPHANIE LIMA, in coordination with CHARLES HALL,

III and JOSEPH A. GIORGIANNI, arranged to travel to the offices of a Nutley, New Jersey physician (the "Physician") to obtain oxycodone-based pain pills for distribution in exchange for payment. On August 17, 2011, defendant CAROL KOUNITZ traveled with STEPHANIE LIMA and CHARLES HALL, III to Nutley, where she attended an appointment with the Physician and obtained from the Physician a prescription for 120 15-milligram oxycodone pills. During this trip, STEPHANIE LIMA tried to attend an appointment with the Physician in order to obtain a prescription for oxycodone pills, but was unsuccessful. Defendant CAROL KOUNITZ and STEPHANIE LIMA later filled the prescription obtained by defendant CAROL KOUNITZ and provided the 120 15-milligram oxycodone pills to CHARLES HALL, III in exchange for payment.

5. It was further part of the conspiracy that, on September 14, 2011, defendant CAROL KOUNITZ and STEPHANIE LIMA, in coordination with CHARLES HALL, III, again traveled to Nutley and attended appointments at the Physician's office. During this trip, defendant CAROL KOUNITZ obtained from the Physician a prescription for 120 30-milligram oxycodone pills. STEPHANIE LIMA obtained from the Physician a prescription for 120 15-milligram oxycodone pills. Defendant CAROL KOUNITZ and STEPHANIE LIMA later filled those prescriptions and provided the 120 30-milligram and the 120 15-milligram oxycodone pills to CHARLES HALL, III in exchange for payment.

In violation of Title 21 United States Code, Section

846.



PAUL J. FISHMAN
United States Attorney

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