

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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

INFORMATION

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

1. Defendant **STEPHANIE LIMA** was an associate of **CHARLES HALL, III** and **CAROL KOUNITZ**.

2. **JOSEPH A. GIORGIANNI** was an associate of **CHARLES HALL, III** and oversaw the distribution of oxycodone-based pain pills obtained by defendant **STEPHANIE LIMA**, **CHARLES HALL, III**, and **CAROL KOUNITZ**.

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

STEPHANIE LIMA

did knowingly and intentionally conspire with **CHARLES HALL, III**, **CAROL KOUNITZ**, **JOSEPH A. GIORGIANNI** and others to distribute and to possess with intent to distribute a mixture and substance containing a detectible 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 **STEPHANIE LIMA** and **CAROL KOUNITZ**, 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 **STEPHANIE LIMA** traveled with **CAROL KOUNITZ** and **CHARLES HALL, III** to Nutley where she tried to attend an appointment with the Physician in order to obtain a prescription for oxycodone pills, but was unsuccessful. During this trip, **CAROL KOUNITZ** also attended an appointment with the Physician and obtained from the Physician a prescription for 120 15-milligram oxycodone pills. Defendant **STEPHANIE LIMA** and **CAROL KOUNITZ** later filled the prescription obtained by **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 **STEPHANIE LIMA** and **CAROL KOUNITZ**, in coordination with **CHARLES HALL, III**, again traveled to Nutley and attended appointments at the Physician's office. During this trip, defendant **STEPHANIE LIMA** obtained from the Physician a prescription for 120 15-milligram oxycodone pills. **CAROL KOUNITZ** obtained from the Physician a prescription for 120 30-milligram oxycodone pills. Defendant **STEPHANIE LIMA** and **CAROL KOUNITZ** later filled those prescriptions and provided the 120 15-

milligram and the 120 30-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

CASE NUMBER: _____

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

STEPHANIE LIMA

INFORMATION FOR

21 U.S.C. § 846

PAUL J. FISHMAN

U.S. ATTORNEY NEWARK, NEW JERSEY

ERIC W. MORAN

MATTHEW J. SKAHILL

Assistant U.S. Attorneys

Trenton, New Jersey

(609) 989-2190
