



**ATTACHMENT A**

**Count One**  
**(Conspiracy to Distribute Controlled Substances)**

From at least on or about July 11, 2022 to on or about October 3, 2023, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**JASMINE MCGREGOR,**

did knowingly and intentionally conspire and agree with a physician licensed in the State of New Jersey to distribute and dispense, outside the usual course of professional practice and not a legitimate medical purpose, mixtures and substances containing detectable amounts of oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a) and (b)(1)(C).

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

## ATTACHMENT B

I, Christopher Martinelli, am a Special Agent of the Federal Bureau of Investigation (“FBI”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and audio and video recordings. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the actions, statements, and communications of others are reported herein, they are reported in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### The Controlled Substances Act

1. The Controlled Substances Act (“CSA”), codified in Title 21 of the United States Code, and its promulgating regulations, classify drugs into five schedules depending on a drug’s acceptable medical use and its abuse and dependency potential.

2. Schedule I controlled substances, such as heroin, have a high potential for abuse and no acceptable medical use in the United States. Schedule II through Schedule V controlled substances have acceptable medical uses.

3. The medical uses of Schedule II controlled substances are severely restricted because such drugs have a high potential for abuse and severe psychological and physical dependence.

4. Title 21, United States Code, Section 841(a)(1), provides that “[e]xcept as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally . . . to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.”

5. Title 21, United States Code, Section 802(10), provides that the term “dispense” means “to deliver a controlled substance to an ultimate user . . . by, or pursuant to the lawful order of, a practitioner, including the prescribing and administering of a controlled substance and the packaging, labeling or compounding necessary to prepare the substance for such delivery.”

6. Title 21, United States Code, Section 802(21), provides that “‘practitioner’ means a physician . . . .”

7. The CSA authorizes physicians to dispense Schedule II through Schedule V controlled substances to individuals pursuant to a “lawful order” or valid prescription. 21 U.S.C. § 829.

8. For a prescription for a controlled substance to be valid, it must be issued for a legitimate medical purpose by a registered practitioner acting in the usual course of his or her professional practice. 21 C.F.R. § 1306.04 (“An order purporting to be a prescription issued not in the usual course of professional treatment . . . is not a prescription within the meaning and intent of [21 U.S.C. § 829]”).

9. Physicians must obtain and maintain a registration with the Drug Enforcement Administration (“DEA”) which authorizes them to lawfully prescribe controlled substances in the Schedules in which they are registered (“registered practitioner”). 21 C.F.R. § 1306.03.

10. A registered practitioner who issues prescriptions for controlled substances not in the usual course of professional practice and not for a legitimate medical purpose violates the provisions of the CSA and is subject to its penalties. 21 C.F.R. § 1306.04.

11. The New Jersey Division of Consumer Affairs maintains the New Jersey Prescription Monitoring Program (“PMP”), an electronic database of controlled substances dispensed in New Jersey. PMP records include the name, date of birth, and address of the patient, the description and quantity of the medication dispensed, and the dispensing pharmacy.

### **Oxycodone**

12. Oxycodone is a Schedule II controlled substance and an opioid pain medication with a high potential for abuse.

13. Oxycodone refers to the generic oral immediate-release formulation of oxycodone hydrochloride. Oxycodone is available in the following strengths: 5 mg, 10 mg, 15 mg, 20 mg, and 30 mg. The most abused strength of oxycodone is 30 mg.

### **Relevant Individuals**

14. At all times relevant to this Complaint,

a. The Defendant, Jasmine McGregor (“MCGREGOR”) was a resident of New Jersey.

b. MCGREGOR was not a licensed physician or trained medical professional, or registered with the DEA as an individual authorized to prescribe controlled substances.

c. Lisa Ferraro (“Ferraro”) was a resident of New Jersey and a licensed physician in the State of New Jersey, practicing internal medicine at a location in Paterson, New Jersey (“Ferraro’s Office”).

d. Ferraro was a registered practitioner with the DEA. As a registered practitioner with the DEA, Ferraro was authorized to prescribe, and distribute and dispense, Schedule II controlled substances in the usual course of professional practice and for a legitimate medical purpose.

e. On or about September 27, 2023, Ferraro was charged by complaint with conspiracy to distribute oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a) and (b)(1)(C), in violation of Title 21, United States Code, Section 846. See Misc. No. 23-12185 (JBC). The complaint against Ferraro alleges that Ferraro conspired and agreed with others to distribute and dispense, outside the usual course of professional practice and not for a legitimate medical purpose, mixtures and substances containing detectable amounts of oxycodone.

f. On or about October 3, 2023, law enforcement officers arrested Ferraro and lawfully seized patient records from Ferraro’s Office and Ferraro’s cellphone.

g. As set forth below, MCGREGOR conspired with Ferraro to unlawfully obtain prescriptions for controlled substances in the names of others (the “Purported Patients”) without their authorization. The Purported Patients were not actually patients of Ferraro.

h. Purported Patient-1 was a resident of Passaic, New Jersey.  
Purported Patient-1.

i. Purported Patient-2 was a resident of Paterson, New Jersey.

j. Purported Patient-3 was a resident of Bridgewater, New Jersey.

k. Pharmacist-1 and Technician-1 were a pharmacist and pharmacy technician, respectively, at a pharmacy in Paterson, New Jersey (“Pharmacy-1”).

l. Pharmacist-2 was a pharmacist at a pharmacy in Clifton, New Jersey (“Pharmacy-2”).

m. Pharmacist-3 was a pharmacist at a pharmacy with branches in Clifton and Paterson, New Jersey (“Pharmacy-3”).

## The Conspiracy

15. From at least as early as in or around June 20, 2022 through on or about October 3, 2023, MCGREGOR and Ferraro conspired and agreed with each other to prescribe controlled substances, including oxycodone, outside the usual course of professional practice and not for a legitimate medical purpose.

16. The goal of the conspiracy was for MCGREGOR and Ferraro to obtain oxycodone without a valid prescription for their own personal use and for the use of others.

17. As part of the conspiracy, MCGREGOR, who was not a licensed medical professional, provided Ferraro with personal identifying information, including names, dates of birth, and addresses, for the Purported Patients.

18. Without examining the Purported Patients or determining whether there was a legitimate medical purpose for doing so, Ferraro wrote prescriptions, typically on a monthly basis and typically for 90 tablets of 30 mg oxycodone for each of the Purported Patients. Ferraro gave the prescriptions to MCGREGOR who filled these prescriptions at pharmacies, including Pharmacies-1 through -3, for further distribution.

### Purported Patient-1

19. Between on or about July 11, 2022 and on or about August 10, 2023, Ferraro wrote approximately 15 prescriptions for Purported Patient-1. These prescriptions included one prescription for 60 pills of 30 mg oxycodone; ten prescriptions for 90 pills of 30 mg oxycodone; and four prescriptions for 90 pills of 20 mg oxycodone.

20. On or about December 26, 2022, MCGREGOR sent a text message to Ferraro stating, in pertinent part, “[Purported Patient-1] is due on Friday the 30th so we can do hers.”<sup>1</sup> PMP records show that Ferraro prescribed 90 pills of 30 mg oxycodone to Purported Patient-1 on or about December 30, 2022.

21. On or about June 10, 2023, Ferraro sent MCGREGOR a text message asking, “[Purported Patient-1’s first name]? If you have her date of birth, I can look her up.” MCGREGOR responded with Purported Patient-1’s full name and date of birth. PMP records show that Ferraro prescribed Purported Patient-1 90 pills of 20 mg oxycodone on or about June 12, 2023.

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<sup>1</sup> Statements attributed to MCGREGOR were sent from a number that is subscribed to MCGREGOR and listed with the name “Jasmine Mcgrego” in a phone seized from FERRARO on October 3, 2023.

22. On or about November 27, 2023, law enforcement officers interviewed Purported Patient-1. During the interview, Purported Patient-1 denied being a patient of Ferraro and denied knowledge of any prescriptions written for them by Ferraro. Purported Patient-1 did, however, acknowledge knowing MCGREGOR and stated that during a social visit, MCGREGOR asked Purported Patient-1 for Purported Patient-1's age and date of birth.

23. On or about December 5, 2023, law enforcement officers interviewed Pharmacist-1 and Technician-1 separately at Pharmacy-1. During Pharmacist-1's interview, Pharmacist-1 stated that MCGREGOR brought a prescription for Purported Patient-1 to Pharmacy-1 for the first time in May 2023. Pharmacist-1 stated that the prescription was for 30 mg pills of oxycodone and that Pharmacist-1 called Ferraro to tell her that Pharmacy-1 did not have 30 mg oxycodone pills available. During the call, Ferraro said she would write a new prescription for 20 mg oxycodone pills. Later that day MCGREGOR returned to Pharmacy-1 with a prescription for 20 mg oxycodone pills for Purported Patient-1. During Technician-1's December 5, 2023 interview with law enforcement, Technician-1 corroborated Pharmacist-1's statements about the May 2023 prescription for Purported Patient-1 and added that MCGREGOR had also dropped off prescriptions and picked up pills for Purported Patient-1 at Pharmacy-1 in June and August of 2023.

### **Purported Patient-2**

24. Between on or about August 17, 2022 and on or about August 16, 2023, Ferraro wrote approximately 15 prescriptions for Purported Patient-2. These prescriptions included 13 prescriptions for 90 pills of 30 mg oxycodone and 2 prescriptions for 60 pills of 30 mg oxycodone tablets.

25. On or about January 1, 2023, MCGREGOR sent Ferraro a text message stating, "Also [Purported Patient-2] is due for tomorrow so if you wana meet up later so I can grab it." PMP records show that Ferraro prescribed Purported Patient-2 90 tablets of 30 mg oxycodone on January 2, 2023.

26. On or about November 27, 2023, law enforcement officers spoke with Purported Patient-2. Purported Patient-2 denied being a patient of Ferraro and denied knowledge of any prescriptions written for them by Ferraro. Purported Patient-2 recalled being surprised when, during a recent doctor's appointment, the physician reviewed Purported Patient-2's prescription records and asked if Purported Patient-2 had been taking an opioid painkiller. Purported Patient-2 was surprised because she had not been taking an opioid painkiller. Purported Patient-2 indicated that MCGREGOR was a former colleague and that when they worked together, they had a friendly relationship.

27. On or about December 1, 2023, law enforcement officers interviewed Pharmacist-2 at Pharmacy-2. During the interview, Pharmacist-2 stated that, in April 2023, MCGREGOR brought a prescription for Purported Patient-2 to Pharmacy-2 and that, consistent with Pharmacy-2's practices, Pharmacist-2 scanned a copy of MCGREGOR's driver's license, which remains in Pharmacy-2's records.

### **Purported Patient-3**

28. Between on or about June 28, 2022 and on or about August 21, 2023, Ferraro wrote approximately eighteen prescriptions for Purported Patient-3. These prescriptions included fourteen prescriptions for 90 pills of 30 mg oxycodone; one prescription for 90 pills of 20 mg oxycodone, one prescription of 15 pills of 30 mg oxycodone; one prescription for 55 pills of 30 mg oxycodone; and one prescription for 60 pills of 30 mg oxycodone.

29. On or about January 12, 2023, MCGREGOR sent Ferraro a text message stating, "[s]o I can do [Purported Patient-3]'s tomorrow... I just would need you to write a new 1 and I can get it later." The PMP records show that Ferraro prescribed Purported Patient-3 90 pills of 30 mg oxycodone on January 13, 2023.

30. On or about December 7, 2023, law enforcement officers interviewed Purported Patient-3. Purported Patient-3 denied being Ferraro's patient. Purported Patient-3 identified MCGREGOR from a photograph presented by the law enforcement officers. Purported Patient-3 recalled meeting MCGREGOR on a dating website and going on two dates with MCGREGOR in 2022.

31. Over the course of the conspiracy, Ferraro prescribed approximately 360 20mg oxycodone pills and 3,550 30mg tablets to Purported Patients-1 through -3.

32. On or about October 3, 2023, pursuant to a lawfully obtained search warrant, law enforcement recovered patient records from Ferraro's office, including records for Purported Patients -1, -2, and -3. The records for Purported Patients -1, -2, and -3 included only a "Patient Intake Form," listing the patient's name, date of birth, gender, address, and a "Treatment Sheet" listing dates that correspond approximately with dates of prescriptions. These minimal patient records for Purported Patients -1, -2, and -3 indicate drug diversion, because the records lack notation for patients prescribed highly addictive opioids for an extended period of time. Specifically, the records for Purported Patients -1, -2, and -3 lack details of medical history, physical examinations, risk assessments, treatment plans, and/or the diagnostic imaging that is typically required when establishing the medical necessity of prescribing CS, namely oxycodone. More importantly, the records indicate that Patients-1, -2, and -3, were not examined by Ferraro, and that the



patients did not receive any diagnosis to justify the prescription of a scheduled II controlled substance. Notably, numerous other patient records recovered pursuant to the search warrant suffered from similar deficiencies.

### **Personal Use of Prescribed Medication**

33. Throughout the course of the conspiracy MCGREGOR and Ferraro discussed the distribution of the prescribed medication for their own use and for the use of other individuals who were not the Purported Patients. For example:

a. On or about January 1, 2023, MCGREGOR sent Ferraro a text message asking, “[d]o you have any vitamins for me or are they all allocated lol.”

b. On or about January 22, 2023, MCGREGOR sent Ferraro a text message saying, “I don’t have any more of the vitamins and they were helping me a lot especially sweat this damn fever out.” Ferraro responded, “Are you taking anything else like ibuprofen or naproxen in between? I don’t want you to have a problem down the line.”

c. On or about February 5, 2023, MCGREGOR sent Ferraro a series of text messages stating, “I might be able to find you a few Xanax ... I’m still looking for some vitamins for mi madre. If you have some ... we can go half and half tomorrow.” Ferraro responded, “I’m pretty good with the xans for now” and later added, “It’s in the window Let me know when you get it.” After MCGREGOR told Ferraro that she had arrived, MCGREGOR asked, “did you bring a few for her” and Ferraro responded, “I put 3.”