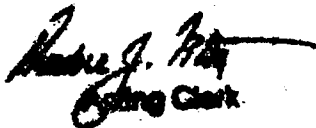


SUPERIOR COURT OF N.J.  
FILED

JUN 12 2007



SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ541-07-7 §2)  
Superior Court  
Docket Number 07-06-00063-S

STATE OF NEW JERSEY )

INDICTMENT

v. )

JOYCE SARTE-FULLER )

also known as )

JOYCE SARTE )

also known as )

JOYCE FULLER )

also known as )

JOYCE FULLER-WICKIZER )

also known as )

JOYCE SARTE-WICKIZER )

JEFFREY WICKIZER )

and )

PAMELA ASAY )

The Grand Jurors of and for the State of New Jersey, upon  
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

JOYCE SARTE-FULLER

JEFFREY WICKIZER

and

PAMELA ASAY

who are named as defendants herein, and other unknown persons  
who are conspirators, but who are not named as defendants herein,  
between on or about December 1, 2002, and on or about March 17,

2004, in the Townships of Mount Laurel, Riverside and Moorestown, all in the County of Burlington, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crimes of theft by unlawful taking, falsifying records, forgery, health care claims fraud, obtaining a controlled dangerous substance by fraud, and distribution of controlled dangerous substances, and did agree that:

- A. One or more of them would knowingly engage in conduct which would constitute the aforesaid crimes, and
- B. One or more of them knowingly would aid in the planning and commission of said crimes, that is:
  - 1. Theft by Unlawful Taking, in violation of the provisions N.J.S.A. 2C:20-3(a);
  - 2. Falsifying Records, in violation of the provisions of N.J.S.A. 2C:21-4;
  - 3. Forgery, in violation of the provisions of N.J.S.A. 2C:21-1;
  - 4. Health Care Claims Fraud, in violation of the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3c;
  - 5. Obtaining a Controlled Dangerous Substance by Fraud, in violation of N.J.S.A. 2C:35-13;
  - 6. Distribution of a Controlled Dangerous Substance,

in violation of the provisions of N.J.S.A.  
2C:35-5a(1), N.J.S.A. 2C:35-5b(4), and N.J.S.A.  
2C:35-5b(13).

Among the means by which the aforesaid conspirators would carry out the conspiracy are the following:

It was part of the said conspiracy that On December 16, 2002, the said JOYCE SARTE-FULLER did fraudulently enroll in the Amerihealth Group Health Insurance plan of the said JEFFREY WICKIZER through his employment at MedLaurel Inc. in Riverside, New Jersey.

The said JEFFREY WICKIZER did falsify an Amerihealth Enrollment/Change Form by purporting that JOYCE SARTE-FULLER was his dependent spouse and using the fraudulent name of "Joyce Sarte-Wickizer".

It was a further part of the said conspiracy that the said JOYCE SARTE-FULLER, who was a patient of Dr. Jodi D. Kaufman at Moorestown Internal Medicine, Moorestown, New Jersey, stole New Jersey Prescription Blanks as referred to in R.S. 45:14-14 from the Moorestown Internal Medicine offices and forged doctor's signatures in order to obtain controlled dangerous substances from the local pharmacies.

It was a further part of the said conspiracy that once she obtained these controlled dangerous substances, the said JOYCE SARTE-FULLER would submit bills for the doctor's visits and

prescriptions under JEFFREY WICKIZER'S Amerihealth Group Insurance plan she was fraudulently enrolled in.

It was a further part of the said conspiracy that the said JOYCE SARTE-FULLER had possession for distribution of both controlled dangerous substances and prescription drugs in a second floor closet inside her residence at 17 Zinnia Court, Mount Laurel, New Jersey.

It was a further part of the said conspiracy that the said JOYCE SARTE-FULLER was distributing these controlled dangerous substances out of her home and using the said JEFFREY WICKIZER and PAMELA ASAY to sell the controlled dangerous substances.

It was a further part of the said conspiracy that the said PAMELA ASAY and the said JEFFREY WICKIZER in exchange for selling these controlled dangerous substances for the said, JOYCE SARTE-FULLER would receive a portion of these controlled dangerous substances as compensation.

In pursuance of the said conspiracy, the following Overt Acts among others were committed.

#### OVERT ACTS

1. On December 1, 2002, at the Township of Riverside, in the County of Burlington, the said JEFFREY WICKIZER did add JOYCE SARTE-FULLER on his Amerihealth Group Insurance Plan, # 138644615 as his spouse, even though she was not his spouse so the said JOYCE SARTE-FULLER

could be paid or reimbursed for her health care services.

2. On a date prior to September 25, 2003, on an exact date unknown to the Grand Jurors, at the Township of Moorestown, in the County of Burlington, the said JOYCE SARTE-FULLER did steal from the Moorestown Internal Medicine, New Jersey Prescription Blanks as referred on R.S. 45:1-14.
3. On September 24, 2003, at the Township of Mount Laurel, in the County of Burlington, the said JOYCE SARTE-FULLER did forge a New Jersey Prescription Blank for 100 tablets of 5 mg. oxycodone acetaminophen (percocets) in the patient name of the said JEFFREY WICKIZER and did solicit the said PAMELA ASAY to pick up the prescription drugs for her.
4. On September 24, 2003, at the Township of Moorestown, in the County of Burlington, the said PAMELA ASAY did fill and obtain the 100 tablets of 5 mg. oxycodone acetaminophen (percocets) at the CVS Pharmacy, 219 West Main Street, Moorestown, New Jersey.
5. On September 24, 2003, at the Township of Mount Laurel, in the County of Burlington, the said PAMELA ASAY returned to the residence of the said JOYCE FULLER-WICKIZER at 19 Zinnia Court, Mount Laurel, with the 100

tablets of 5 mg. oxycodone acetaminophen (percocets) she obtained from the CVS and gave the pill bottle to the said JOYCE SARTE-FULLER. For the said PAMELA ASAY's part in the scheme, the said JOYCE SARTE-FULLER gave the said PAMELA ASAY approximately half the pills in the bottle and kept the other half for herself.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Leader of a Narcotics Trafficking Network - First Degree)

JOYCE SARTE-FULLER

between on or about December 1, 2002, and on or about March 17, 2004, in the Townships of Mount Laurel, Riverside and Moorestown, all in the County of Burlington, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier or manager, to engage for profit in a scheme or course of conduct to unlawfully manufacturer, distribute, dispense, bring into or transport in this State morphine and/or oxycodone acetaminophen (percocet), both Schedule II controlled dangerous substances, contrary to the provisions of N.J.S.A. 2C:35-3, N.J.S.A. 2C:5-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Falsifying Records - Fourth Degree)

JOYCE SARTE-FULLER

and

JEFFREY WICKIZER

on or about December 1, 2002, at the Townships of Riverside and Mount Laurel, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did falsify a writing or record or did utter a writing or record knowing that it contained false statements or information, with the purpose to deceive or injure Amerihealth Insurance Company, that is, the said JOYCE SARTE-FULLER and JEFFREY WICKIZER did falsify or utter an "Amerihealth Enrollment/Change form" dated December 1, 2002, so that JOYCE SARTE-FULLER could obtain insurance payments and reimbursements from Amerihealth Insurance Company knowing said form contained false information, with purpose to deceive Amerihealth Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT FOUR

(Health Care Claims Fraud - Second Degree)

JOYCE SARTE-FULLER

and

JEFFREY WICKIZER

persons who are not practitioners, between on or about December 1, 2002, and on or about September 23, 2003, at the Townships of Mount Laurel and Riverside, both in the County of Burlington, elsewhere and within the jurisdiction of this Court, knowingly did commit five or more acts of health care claims fraud and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000, in that the said JOYCE SARTE-FULLER and JEFFREY WICKIZER knowingly did make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly did omit material facts from or knowingly did cause material facts to be omitted from, any records, bills, claims or other document, in writing, electronically or in any other form that a person attempted to submit, submitted, caused to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services; that is, the said JOYCE SARTE-FULLER and JEFFREY WICKIZER knowingly did commit five or more acts of Health Care Claims Fraud and the aggregate pecuniary benefit obtained or sought to be obtained was in excess of \$1,000 in that the said JOYCE SARTE-FULLER and JEFFREY

WICKIZER knowingly did make or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in health claims that they submitted or caused to be submitted for payment or reimbursement for health care services to Amerihealth Insurance Company under the health care plan of JEFFREY WICKIZER, by JOYCE SARTE-FULLER fraudulently submitting her health care claims under the false name of JOYCE SARTE-WICKIZER, purporting to be the spouse of JEFFREY WICKIZER, so she could receive payment or reimbursement for health claims under the said health plan when she was not entitled to be paid or reimbursed, contrary to the provisions of N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-4.3c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Forgery - Third Degree)

JOYCE SARTE-FULLER

and

PAMELA ASAY

on or about September 24, 2003, at the Township of Moorestown, in the County of Burlington, elsewhere, and within the jurisdiction of this Court with the purpose to defraud or injure another, or with knowledge that they were facilitating a fraud or injury to be perpetrated by another, did utter or cause to be uttered a writing so that it purported to be the act of another who did not authorize that act, that is, the said JOYCE SARTE-FULLER and PAMELA ASAY with purpose to defraud or injure CVS Pharmacy, 219 West Main Street, Moorestown, New Jersey, did utter a New Jersey Prescription Blank as referred to in R.S. 45:14-14, containing 100 tablets of 5 mg. oxycodone acetaminophen (percocets) in the patient name of Jeffrey Wickizer dated September 23, 2003, issued by Dr. Jodi D. Kaufman of Moorestown Internal Medicine, with a purported signature of Dr. Jodi D. Kaufman, who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Obtaining of a Controlled Dangerous Substance  
by Fraud - Third Degree)

JOYCE SARTE-FULLER

and

PAMELA ASAY

on or about September 24, 2003, at the Township of Moorestown, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly acquire or obtain possession of a controlled dangerous substance, that is, oxycodone acetaminophen (percocet), by misrepresentation, fraud, forgery, deception or subterfuge, in violation of N.J.S.A. 2C:35-13 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Theft by Receiving Stolen Property - Third Degree)

JOYCE SARTE-FULLER

between on or about February 10, 2004 and February 12, 2004 at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly receive moveable property of another belonging to Mount Laurel Allergy Associates, knowing it was stolen, specifically by having in her possession and under her control a blank prescription pad containing (54) separate prescription forms or scripts, that is (54) New Jersey Prescription Blanks as referred to in R.S. 45:14-14, in violation of N.J.S.A. 2C:20-7, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft by Receiving Stolen Property - Third Degree)

JOYCE SARTE-FULLER

between on or about February 10, 2004 and February 12, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly receive moveable property of another belonging to Mount Laurel Dental Associates, knowing it was stolen, specifically by having in her possession and under her control a blank prescription pad containing (80) separate prescription forms or scripts, that is (80) New Jersey Prescription Blanks as referred to in R.S. 45:14-14, in violation of N.J.S.A. 2C:20-7, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly possess a controlled dangerous substance, that is, morphine, a Schedule II controlled dangerous substance, in violation of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Possession With Intent to Distribute a Controlled  
Dangerous Substance - Second Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly or purposely possess or have under her control with the intent to distribute, a controlled dangerous substance, that is, morphine, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(4), and against the peace of this State, the government and dignity of the same.



COUNT ELEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly possess a controlled dangerous substance, that is, alprazolam(xanax), a Schedule IV dangerous substance, in violation of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession With Intent to Distribute a Controlled  
Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly or purposely possess or have under her control with the intent to distribute, a controlled dangerous substance, that is, alprazolam(xanax), a Schedule IV narcotic drug, in a quantity of one ounce including any adulterants or dilutants, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly possess a controlled dangerous substance, that is, triazolam, a Schedule IV controlled dangerous substance, in violation of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Possession With Intent to Distribute a Controlled  
Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly or purposely possess or have under her control with the intent to distribute, a controlled dangerous substance, that is, triazolam, a Schedule IV narcotic drug, in a quantity less than one ounce or more including any adulterants or dilutants, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13), and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly possess a controlled dangerous substance, that is, hydrocodone acetaminophen-(norco, vicodin, lorcet) a Schedule III narcotic drug, in violation of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Possession With Intent to Distribute a Controlled  
Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly or purposely possess or have under her control with the intent to distribute, a controlled dangerous substance, that is, hydrocodone acetaminophen-(norco, vicodin, lorcet) a Schedule III narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JOYCE SARTE-FULLER

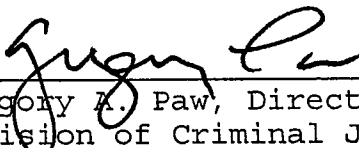
on or about March 17, 2004, at the Township of Mount Laurel, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly possess a controlled dangerous substance, that is, oxycodone acetaminophen (percocet), a Schedule II narcotic drug, in violation of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Possession With Intent to Distribute a Controlled  
Dangerous Substance - Second Degree)

JOYCE SARTE-FULLER

on or about March 17, 2004, at the Township of Mount Laurel, in  
the County of Burlington, elsewhere and within the jurisdiction  
of this Court, did knowingly or purposely possess or have under  
her control with the intent to distribute, a controlled dangerous  
substance, that is, oxycodone acetaminophen(percocet), a Schedule  
II narcotic drug, in a quantity of one ounce or more including  
any adulterants or dilutants, in violation of N.J.S.A.  
2C:35-5a(1) and N.J.S.A. 2C:35-5b(4), and against the peace of  
this State, the government and dignity of the same.

  
\_\_\_\_\_  
Gregory A. Paw, Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
, Foreperson

Dated: 6/11/07



SUPERIOR COURT OF N.J.  
FILED

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

JUN 12 2007

State Grand Jury  
Number SGJ541-07-7(2)  
Superior Court  
Docket Number 07-06-00063-S

*[Handwritten Signature]*  
Clerk

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

JOYCE SARTE-FULLER )

a/k/a

JOYCE SARTE )

a/k/a

JOYCE FULLER )

a/k/a

JOYCE FULLER-WICKIZER )

a/k/a

JOYCE SARTE-WICKIZER )

JEFFREY WICKIZER )

and )

PAMELA ASAY )

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

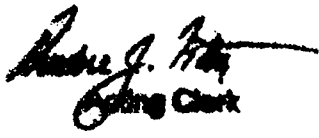
IT IS ORDERED on this 11<sup>th</sup> day of June, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Burlington be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Burlington for filing.

\_\_\_\_\_  
Linda R. Feinberg, A.J.S.C.

SUPERIOR COURT OF N.J.  
FILED

JUN 12 2007



SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ541-07-7(1)  
Superior Court  
Docket Number 07-06-00062-S

STATE OF NEW JERSEY )  
v. )  
INDICTMENT  
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also known as )  
JOYCE SARTE )  
also known as )  
JOYCE FULLER )  
also known as )  
JOYCE FULLER-WICKIZER )  
also known as )  
JOYCE SARTE-WICKIZER )

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Attempted Theft by Deception - Second Degree)

JOYCE SARTE-FULLER

between on or about April 28, 2002, and on or about August 26, 2003, at the Township of Mount Laurel, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another by deception in an amount in excess of \$75,000; that is, the said JOYCE SARTE-FULLER purposely did obtain and did attempt to obtain property from United Services Automobile Association Insurance Company by submitting a fraudulent "Itemized Statement of Loss"

and creating the false impression that she was entitled to be reimbursed for a theft under United Services Automobile Association Policy #0051 17 64 92A;

WHEREAS, IN TRUTH AND IN FACT, as the said JOYCE SARTE-FULLER well knew that the "Itemized Statement of Loss" submitted in support of Claim #5011764-92A was fraudulent and she was, therefore, not entitled to be reimbursed for a theft loss under United Services Automobile Association Insurance Company Policy #0051 17 64 92A; contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Falsifying Records - Fourth Degree)

JOYCE SARTE-FULLER

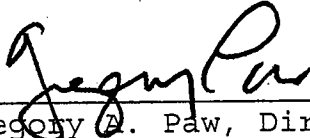
between on or about July 8, 2002, and on or about January 20, 2003, at the Township of Mount Laurel, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did falsify a writing or record or did utter a writing or record knowing that it contained false statements or information, with the purpose to deceive or injure United Services Automobile Association Insurance Company, that is, the said JOYCE SARTE-FULLER did falsify or utter an "Itemized Statement of Loss" form dated July 8, 2002, so JOYCE SARTE-FULLER could obtain insurance payments or reimbursements from the United Services Automobile Association Insurance Company knowing said form contained false information, with purpose to deceive United Services Automobile Association Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-4, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Unsworn Falsification to Authorities - Fourth Degree)

JOYCE SARTE-FULLER

on or about March 29, 2005 at the Township of Maple Shade, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly make a written false statement to the Maple Shade Police Department which she did not believe to be true on or pursuant to a form, that is a "Maple Shade Police Department Victim's Report of Stolen Property" form in violation of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



\_\_\_\_\_  
Gregory A. Paw, Director  
Division of Criminal Justice

A TRUE BILL:



\_\_\_\_\_  
, Foreperson

Dated: \_\_\_\_\_

6/11/07

SUPERIOR COURT OF N.J.  
FILED

JUN 12 2007

*Thomas J. Pity*  
*Clerk*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ541-07-7(1)  
Superior Court  
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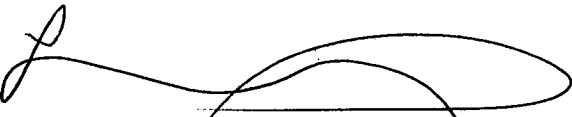
a/k/a

JOYCE SARTE-WICKIZER )

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 11th day of June, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Burlington be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Burlington for filing.

  
\_\_\_\_\_  
Linda R. Feinberg, A.J.S.C.