

FILED

FEB 14 2011

SUPERIOR COURT  
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ601-11-1

Superior Court

Docket Number 11-02-00013-S

STATE OF NEW JERSEY

)

V.

)

INDICTMENT

LOUIS LISI

)

CLIFTON HOWELL

)

and

)

AMIR TADROS

)

COUNT ONE

(Racketeering - First Degree)

LOUIS LISI

CLIFTON HOWELL

and

AMIR TADROS

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal enterprise but not named as defendants herein, at the times and places herein specified, did commit the crime of Racketeering, that is, the defendants and other persons employed by or associated with an enterprise engaged in or the activities of which affected trade or commerce, purposely or knowingly did

conduct or participate directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, in violation of N.J.S.A. 2C:41-2c and N.J.S.A. 2C:41-2d, all as hereinafter described.

#### THE RELEVANT TIMES

1. The predicate criminal activity occurred between in or about April 2008, and in or about December 2009.

#### THE RELEVANT PLACES

2. The predicate criminal activity took place at the City of Jersey City, at the City of Union City, and at the City of Hoboken, all in the County of Hudson, at the Borough of Fairview and at the Borough of Cliffside Park, both in the County of Bergen, at the Township of Toms River, in the County of Ocean, at the Borough of Keyport, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court.

#### THE ENTERPRISE

LOUIS LISI, CLIFTON HOWELL and AMIR TADROS, all of whom are co-conspirators; and Robert Silverman, Kamal Moorjani, Thomas Milette, Brian Kelly, Lauren Cardinale, Kenneth Maglione, David Rodriguez, Jack Kennedy, Mark Cerello, Joseph Burkhardt, Martin Williamson, Lisa Cypcar, Danny Reed, Daniel Ross, Darren Marchesani, Tammy Beston, John Bussanich, Martin Taraboccia, Emmanuel Tarabokija, Joseph Chmielewski, Sean Jeffrey, Orlando Rosario, Angela Shoults, Michelle Olivier, William Lewandowski,

Tonya Tilghman, and Allison Monahan who are likewise conspirators and members of the enterprise although not charged herein; and other persons whose identities are both known and unknown to the State Grand Jurors, would constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a union or group of individuals associated in fact, or associates thereof, for the purposes set forth below.

#### THE PURPOSE OF THE ENTERPRISE

The purpose of the enterprise includes the unlawful distribution of prescription controlled dangerous substances in exchange for United States currency accomplished as follows: The enterprise had a leadership which financed, organized, supervised and managed the subordinate members in a common course of conduct to distribute and transport within this State, controlled dangerous substances including Oxycodone, a Schedule II controlled dangerous substance. The enterprise consisted of a number of individuals who on a monthly basis obtained fraudulent prescriptions for controlled dangerous substances from a licensed medical doctor. The enterprise further consisted of a medical doctor who used his New Jersey medical license to generate prescriptions for thousands of pills of controlled dangerous substances and other prescriptions for individuals whom he never examined, or whom he examined but had no medical need for prescription medication, all in exchange for United States

currency. The enterprise further consisted of lower-level members who solicited individuals to see the medical doctor and obtain medically unnecessary prescriptions. The lower-level members and the individuals who saw the doctor were paid cash by the enterprise for their respective roles. The enterprise further consisted of a licensed pharmacist who used his New Jersey pharmacy license to unlawfully dispense prescriptions for thousands of controlled dangerous substance pills in exchange for United States currency. The pharmacists would dispense the controlled dangerous substances to members of the enterprise in exchange for United States currency, even though the prescription was often not in the enterprise member's name. The pharmacists also billed Medicaid for prescriptions that were not in fact dispensed. Once obtained, the controlled dangerous substances were collected by the enterprise. Through this artifice, the enterprise accumulated thousands of prescription narcotic pills each week which were sold throughout the State of New Jersey in exchange for United States currency by the enterprise to individuals whose identities are known and unknown to the State Grand Jurors.

#### **THE PATTERN OF RACKETEERING ACTIVITY**

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, engaged in by members of the enterprise, did consist of at least two incidents of racketeering conduct during the

relevant time period stated above, including but not limited to:  
Leader of Narcotics Trafficking Network (N.J.S.A. 2C:35-3);  
Distribution of Controlled Dangerous Substances and Possession  
with Intent to Distribute Controlled Dangerous Substances  
(N.J.S.A. 2C:35-5, et seq.); Distribution of a Controlled  
Dangerous Substances Near or on School Property (N.J.S.A. 2C:35-7); Distribution of a Controlled Dangerous Substances Within 500  
Feet of Public Property (N.J.S.A. 2C:35-7.1); Employing a  
Juvenile in a Drug Distribution Scheme (N.J.S.A. 2C:35-6); Health  
Care Claims Fraud (N.J.S.A. 2C:21-4.3); Forgery (N.J.S.A. 2C:21-1); Financial Facilitation (N.J.S.A. 2C:21-25) and conspiracy to  
commit the foregoing crimes (N.J.S.A. 2C:5-2), as described  
herein and in Counts Two through Twenty-One of this Indictment.

LOUIS LISI

did commit the racketeering conduct by engaging in and or  
conspiring to commit repeated acts of Leading a Narcotics  
Trafficking Network, Distribution of Controlled Dangerous  
Substances, Distribution of Controlled Dangerous Substances Near  
or on School Property, Distribution of Controlled Dangerous  
Substances Within 500 feet of Public Property, Possession With  
Intent to Distribute Controlled Dangerous Substances, Employing a  
Juvenile in a Drug Distribution Scheme, Health Care Claims Fraud,  
Forgery and Financial Facilitation, all of which are the subjects  
of Counts 2,3,9,10,11,12,15,18,20 and 21 of this Indictment.

CLIFTON HOWELL

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances Near or on School Property, Distribution of Controlled Dangerous Substances Within 500 feet of Public Property and Health Care Claims Fraud, all of which are the subjects of Counts 3,4,5,6 and 17 of this Indictment.

AMIR TADROS

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances Near or on School Property, Distribution of Controlled Dangerous Substances Within 500 Feet of Public Property and Health Care Claims Fraud, all of which are the subjects of Counts 3,4,7,8 and 17 of this Indictment.

All in violation of N.J.S.A. 2C:41-2c, N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Leader of Narcotics Trafficking Network -  
First Degree)

LOUIS LISI

between in or about April 2008, and in or about October 2009, at the City of Jersey City, at the City of Union City, and at the City of Hoboken, all in the County of Hudson, at the Borough of Fairview and at the Borough of Cliffside Park, both in the County of Bergen, at the Township of Toms River, in the County of Ocean, at the Borough of Keyport, in the County of Monmouth, elsewhere, 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 manufacture, distribute, dispense, or transport in this State, Schedule II controlled dangerous substances, including Oxycodone, contrary to the provisions of N.J.S.A. 2C:35-3, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Conspiracy - Second Degree)

LOUIS LISI

CLIFTON HOWELL

and

AMIR TADROS

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between in or about April 2008, and in or about December 2009, at the City of Jersey City, at the City of Union City, and at the City of Hoboken, all in the County of Hudson, at the Borough of Fairview and at the Borough of Cliffside Park, both in the County of Bergen, at the Township of Toms River, in the County of Ocean, at the Borough of Keyport, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Distribution of a Controlled Dangerous Substance, Health Care Claims Fraud and Medicaid Fraud did agree that:

A. one or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. one or more of them knowingly would aid in the planning, solicitation or commission of said crimes, that is:

1. Knowingly or purposely distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic



drug, in the aggregate quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(4),

2. Knowingly did make, or cause to be made, a false, fictitious, fraudulent, or misleading statement of material fact in, or did omit or cause to be omitted a material fact from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit, submit, cause to be submitted, or attempt to cause to be submitted same, for payment or reimbursement for health care services; that is, the said CLIFTON HOWELL and AMIR TADROS, who are practitioners, LOUIS LISI, a non-practitioner, and others whose identities are known and unknown to the Grand Jurors, did knowingly attempt to submit, submit, cause to be submitted, or attempt to cause to be submitted to Medicaid or insurance companies claims for prescription drugs allegedly dispensed, when in fact the prescriptions were not dispensed, not dispensed to the intended individual, or were unlawfully dispensed, thereby causing or attempting to cause pharmacies to submit to Medicaid or insurance companies claims for the prescriptions, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and c; and

3. Knowingly and willfully make or cause to be made a false statement or representation of a material fact in a document necessary to receive any benefit or payment under the New Jersey

Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq., that is, the said, LOUIS LISI, CLIFTON HOWELL, AMIR TADROS, and others whose identities are known and unknown to the Grand Jurors, did knowingly and willfully represent to Medicaid that prescription drugs were dispensed to Medicaid beneficiaries when in fact the prescription drugs were not dispensed, not dispensed to the intended individual, or were unlawfully dispensed, contrary to the provisions of N.J.S.A. 30:4D-17b,

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following overt acts, among others, were committed:

#### OVERT ACTS

1. On June 1, 2009, a cooperating witness (CW1), met with CLIFTON HOWELL in his office. When CW1 was seen by CLIFTON HOWELL, he asked CW1 what CW1 needed. CW1 stated Oxycodone for himself, and Soriatane for his/her friend, who was not present during the visit. During the visit, CLIFTON HOWELL did not obtain a patient history. He also stated he was not familiar with CW1's friend for whom he was writing the Soriatane prescription. Without further discussion, CLIFTON HOWELL wrote CW1 two prescriptions, one for Oxycodone for CW1 and one for Soriatane for the friend. CW1 paid cash for the visit.

2. On August 3, 2009, September 3, 2009, and October 8, 2009, a second cooperating witness (CW2), met with CLIFTON HOWELL in his office. When CW2 was seen by CLIFTON HOWELL he asked CW2

what CW2 needed. CW2 stated Percocet and Advair. During the visits, CLIFTON HOWELL did not obtain a patient history and did not perform an examination. Without further discussion, CLIFTON HOWELL wrote CW2 prescriptions, one for Percocet, one for Soriatane and one for Advair. CW2 paid cash for the visit.

3. Between on or about June 2009, and on or about October 19, 2009, a third cooperating witness (CW3), presented numerous controlled dangerous substance prescriptions to Five Corner's Pharmacy Pharmacist, AMIR TADROS. Instead of dispensing the prescriptions to the intended recipients, CW3 paid United States currency to TADROS for the prescriptions or TADROS billed Medicaid for the prescriptions.

4. Between on or about April 2008, and October 19, 2009, LOUIS LISI directly and indirectly paid United States currency to various lower level members of the enterprise to obtain fraudulent prescriptions for controlled dangerous substances from doctors. The prescriptions were then presented to pharmacies where they were filled. LOUIS LISI sold the controlled dangerous substances to various lower level members of the enterprise in exchange for United States currency. The doctor visits and prescriptions were paid for by cash or billed to Medicaid or insurance companies.

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

COUNT FOUR

(Distribution of a Controlled Dangerous  
Substance - Second Degree)

CLIFTON HOWELL

and

AMIR TADROS

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between in or about January 2009, and on or about October 19, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in an aggregate quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4), N.J.S.A. 2C:35-5c, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Distribution a Controlled Dangerous Substance Near or on School Property - Third Degree)

CLIFTON HOWELL

between in or about January 2009, and on or about October 19, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a, while within 1000 feet of St. Joseph's Catholic School, which is owned or leased to the Archdiocese of New Jersey and used for school purposes, or Public School 17, which is owned or leased to the City of Jersey City Board of Education and used for school purposes, contrary to the provisions of and N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Distribution of a Controlled Dangerous Substance  
within 500 feet of Certain Public Property - Second Degree)

CLIFTON HOWELL

between in or about January 2009, and on or about October 19, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of real property comprising a public housing facility or public park, that is, Hudson Garden Public Housing Complex or Lincoln Park, contrary to the provisions of N.J.S.A. 2C:35-7.1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Distribution a Controlled Dangerous Substance Near or  
on School Property - Third Degree)

AMIR TADROS

between in or about June 2009, and on or about October 19, 2009,  
at the City of Jersey City, in the County of Hudson, elsewhere,  
and within the jurisdiction of this Court, knowingly or purposely  
did distribute a controlled dangerous substance, that is,  
Oxycodone, a Schedule II narcotic drug, contrary to the  
provisions of N.J.S.A. 2C:35-5a, while within 1000 feet of Public  
School 6, which is owned or leased to the City of Jersey City  
Board of Education and used for school purposes, contrary to the  
provisions of and N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against  
the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Distribution of a Controlled Dangerous Substance  
within 500 feet of Certain Public Property - Second Degree)

AMIR TADROS

between in or about June 2009, and on or about October 19, 2009,  
at the City of Jersey City, in the County of Hudson, elsewhere,  
and within the jurisdiction of this Court, knowingly or purposely  
did distribute a controlled dangerous substance, that is,  
Oxycodone, a Schedule II narcotic drug, contrary to the  
provisions of N.J.S.A. 2C:35-5a, while within 500 feet of the  
Hudson County Public Library, a public building, contrary to the  
provisions of N.J.S.A. 2C:35-7.1, N.J.S.A. 2C:2-6, and against  
the peace of this State, the government and dignity of the same.



COUNT NINE

(Distribution of a Controlled Dangerous  
Substance - Second Degree)

LOUIS LISI

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about August 17, 2009, and on or about October 9, 2009, at the City of Jersey City and at the City of Union City, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in an aggregate quantity of one ounce or more including any adulterants or dilutants, that being approximately .17 ounces on August 17, 2009; approximately .13 ounces on August 17, 2009; approximately 1.67 ounces on August 18, 2009; and approximately 1.62 ounces on September 10, 2009; approximately .15 ounces on October 7, 2009; and approximately .09 ounces on October 8, 2009; and approximately .07 ounces on October 9, 2009, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4), N.J.S.A. 2C:35-5c, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Distribution of a Controlled Dangerous Substance Near or  
on School Property - Third Degree)

LOUIS LISI

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about August 17, 2009, and on or about October 9, 2009, at the City of Jersey City and at the City of Union City, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in violation of N.J.S.A. 2C:35-5a, while within 1000 feet of Public School 25 which is owned by or leased to the City Jersey City Board of Education and used for school purposes, or St. Anthony's Grammar School, which is owned or leased to the Archdiocese of New Jersey and used for school purposes, specifically:

DISTRIBUTION DATE	SCHOOL
August 17, 2009 (1:35 p.m.)	Public School 25
August 17, 2009 (4:30 p.m.)	Public School 25
August 18, 2009	Public School 25
October 7, 2009	St. Anthony's Grammar School
October 8, 2009	St. Anthony's Grammar School
October 9, 2009	St. Anthony's Grammar School

contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Distribution of a Controlled Dangerous Substance  
within 500 feet of Certain Public Property - Second Degree)

LOUIS LISI

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about August 17, 2009, and on or about October 9, 2009, at the City of Jersey City and at the City of Union City both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of real property comprising a public park that is, the Leonard Gordon Park, located in the City of Jersey City, or real property comprising a public building that is, Bruce D. Walter Recreation Center, located in the City of Union City, specifically:

DISTRIBUTION DATE	PUBLIC PROPERTY
August 17, 2009 (1:35 p.m.)	Leonard Gordon Park
August 17, 2009 (4:30 p.m.)	Leonard Gordon Park
August 18, 2009	Leonard Gordon Park
October 7, 2009	Bruce D. Walter Recreation Center
October 8, 2009	Bruce D. Walter Recreation Center
October 9, 2009	Bruce D. Walter Recreation Center

contrary to the provisions of N.J.S.A. 2C:35-7.1, N.J.S.A. 2C:2-6, 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 - Second Degree)

LOUIS LISI

on or about October 19, 2009, at the City of Union City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess, or have under his control, with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Attempt to Obtain a Controlled Dangerous  
Substance by Fraud - Third Degree)

LOUIS LISI

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal enterprise but not named as defendants herein, between on or about October 8, 2009, and on or about October 19, 2009, at the City of Jersey City, at the City of Hoboken, and at the City of Union City, all in the County of Hudson, elsewhere, and within the jurisdiction of this Court, purposely did attempt to acquire or obtain possession of a controlled dangerous substance, that is, Oxycodone, by misrepresentation, fraud, forgery, deception or subterfuge, in that the said LOUIS LISI, did attempt to obtain Oxycodone by uttering a New Jersey prescription authorizing the dispensing of controlled dangerous substances in the names/identities of individuals who did not authorize the act, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:35-13, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

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

LOUIS LISI

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal enterprise but not named as defendants herein, on or about August 18, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, purposely did acquire or obtain possession of a controlled dangerous substance, that is, Oxycodone, by misrepresentation, fraud, forgery, deception or subterfuge, in that the said LOUIS LISI did obtain Oxycodone by uttering a New Jersey prescription authorizing the dispensing of controlled dangerous substances in the names/identities of individuals who did not authorize the act, contrary to the provisions of N.J.S.A. 2C:35-13, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Employing a Juvenile in a Drug  
Distribution Scheme - Second Degree)

LOUIS LISI

being at least 18 years of age, between in or about June 2009,  
and on or about October 19, 2009, at the City of Jersey City, at  
the City of Union City, both in the County of Hudson, elsewhere,  
and within the jurisdiction of this Court, knowingly did use,  
solicit, direct, hire or employ a person 17 years of age or  
younger, that is, G.L., born January 12, 1999, or M.L., born  
August 2, 2001, whose identities are known to the Grand Jurors,  
to violate N.J.S.A. 2C:35-5a, contrary to the provisions of  
N.J.S.A. 2C:35-6, and against the peace of this State, the  
government and dignity of the same.

COUNT SIXTEEN

(Endangering the Welfare of a Child - Second Degree)

LOUIS LISI

between in or about June 2009, and on or about October 19, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, having a legal duty for the care of G.L., born January 12, 1999, and M.L., born August 2, 2001, knowingly did cause harm to G.L. or M.L. making G.L. or M.L. an abused or neglected child as defined in R.S. 9:6-1, R.S. 9:6-3 and P.L. 1974, c. 199, s.1 (C. 9:6-8:21), contrary to the provisions of N.J.S.A. 2C:24-4a, and against the peace of this State, the government and dignity of the same.



COUNT SEVENTEEN

(Health Care Claims Fraud - Second Degree)

CLIFTON HOWELL

and

AMIR TADROS

between in or about January 2009, and on or about October 19, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly make, or cause to be made, a false, fictitious, fraudulent, or misleading statement of material fact in, or omit or cause to be omitted a material fact from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit, submit, cause to be submitted, or attempt to cause to be submitted same, for payment or reimbursement for health care services; that is, the said CLIFTON HOWELL and AMIR TADROS, who are both practitioners, did knowingly attempt to submit, submit, cause to be submitted, or attempt to cause to be submitted to Medicaid or insurance companies claims for prescription drugs allegedly dispensed, when in fact, the prescriptions were not dispensed, not dispensed to the intended individual, or were unlawfully dispensed, contrary to the provisions of N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-4.3a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Health Care Claims Fraud - Second Degree)

LOUIS LISI

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between in or about January 2009, and on or about October 19, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly make, or cause to be made, a false, fictitious, fraudulent, or misleading statement of material fact in, or omit or cause to be omitted a material fact from, five or more records, bills, claims or other documents, in writing, electronically or in any other form, and did attempt to submit, submit, cause to be submitted, or attempt to cause to be submitted same, for payment or reimbursement for health care services; and the aggregate pecuniary benefit obtained or sought to be obtained was at least one thousand dollars; that is, the said LOUIS LISI, did knowingly attempt to submit, submit, cause to be submitted, or attempt to cause to be submitted to Medicaid or insurance companies, five or more claims for prescription drugs valued at at least one thousand dollars that were allegedly dispensed, when in fact, the prescriptions were not dispensed, not dispensed to the intended individual, or were unlawfully dispensed, contrary to the provisions of N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-4.3c, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Medicaid Fraud - Third Degree)

LOUIS LISI

CLIFTON HOWELL

and

AMIR TADROS

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between in or about January 2009, and on or about October 19, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly and willfully make or cause to be made a false statement or representation of a material fact in a document necessary to receive any benefit under the New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq., that is, the said LOUIS LISI, CLIFTON HOWELL, AMIR TADROS and others whose identities are known and unknown to the Grand Jurors, did knowingly and willfully represent to Medicaid that prescription drugs were dispensed to Medicaid beneficiaries when in fact, they were not dispensed, not dispensed to the intended beneficiary, or were unlawfully dispensed, contrary to the provisions of N.J.S.A. 30:4D-17b, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Forgery - Third Degree)

LOUIS LISI

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about August 18, 2009, and on or about October 19, 2009, at the City of Jersey City, at the City of Hoboken, and at the City of Union City, all in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with the purpose to defraud or injure anyone or with knowledge they were facilitating a fraud or injury to be perpetrated by anyone, knowingly did make, complete, execute, authenticate, issue, transfer, or utter a writing, which was known to be forged, so that it purported to be the act of another who did not authorize that act or the act of a fictitious person, that is the said LOUIS LISI, made, completed, executed, authenticated, issued, transferred or uttered New Jersey prescriptions authorizing the dispensing of controlled dangerous substances in the names/identities of individuals who did not authorize the act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), N.J.S.A. 2C:21-1a(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

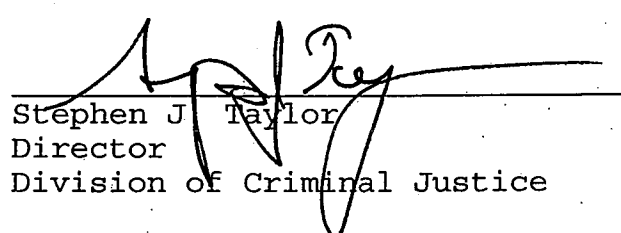
COUNT TWENTY-ONE

(Financial Facilitation - Third Degree)

LOUIS LISI

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between in or about April 2008, and on or about October 19, 2009, at the City of Jersey City and at the City of Union City, both in the County of Hudson, at the Borough of Fairview and at the Borough of Cliffside Park, both in the County of Bergen, at the Township of Toms River, in the County of Ocean, at the Borough of Keyport, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, while engaged in the criminal conduct set forth in this Indictment, did commit the offense of money laundering, in that the said LOUIS LISI did transport or possess property or did engage in transactions involving property known to be derived from criminal activity, including Racketeering, Distribution of Controlled Dangerous Substances, Obtaining Controlled Dangerous Substances by Fraud, Attempting to Obtain Controlled Dangerous Substances by Fraud and Forgery, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be derived from criminal activity, that is, the said LOUIS LISI, did

engage in financial and banking institution transactions, knowing the property that was transported or possessed was derived from criminal activity; that the transactions involving said property were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the said property derived through criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

  
\_\_\_\_\_  
Stephen J. Taylor  
Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
John E. Clancy  
Foreperson

Dated: 2/14/11

FILED

FEB 14 2011

SUPERIOR COURT  
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ601-11-1

Superior Court

Docket Number ~~11-02-00013-S~~

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

LOUIS LISI )

CLIFTON HOWELL )

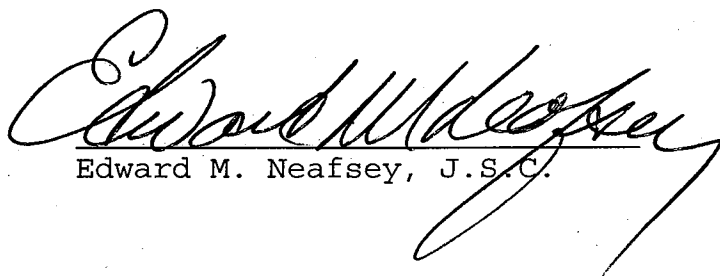
and )

AMIR TADROS )

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

IT IS ORDERED on this 14 day of FEBR, 2011,  
pursuant to paragraph 8 of the State Grand Jury Act, that the  
County of Hudson 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 Hudson for filing.

  
Edward M. Neafsey, J.S.C.