

Pennsylvania medical license number OS008318L, and DEA registration number BO3937781. Defendant O'BRIEN practiced family medicine. Defendant O'BRIEN was not certified in pain management medicine or its related subspecialties; neither had defendant O'BRIEN received specialized training in pain management medicine or its related subspecialties.

2. Defendant WILLIAM J. O'BRIEN III was president and owner of WJO, Inc. ("WJO"), a group of medical practices. On or about November 15, 2010, defendant O'BRIEN filed, in the United States Bankruptcy Court for the Eastern District of Pennsylvania, a bankruptcy petition for WJO under Chapter 11 of the Bankruptcy Code.

3. On or about July 10, 2012, the Trustee appointed by the Bankruptcy Court terminated the employment of defendant WILLIAM J. O'BRIEN III with WJO. Thereafter, defendant O'BRIEN opened a solo practice and began operating as Dr. Bill O'Brien, LLC.

4. Angela Rongione (charged elsewhere) was recruited by defendant WILLIAM J. O'BRIEN III to work as the receptionist at his new practice. At the time, Rongione was employed by WJO. On or about July 16, 2012, Rongione became an employee of Dr. Bill O'Brien, LLC.

5. Defendant O'BRIEN operated his solo practice from various locations including offices located at 2506 Broad Street, Philadelphia PA (a/k/a "South Philly"); 4432 Bristol Road, Suite 2, Trevese PA (a/k/a "Mega-Gym"); 9892 Bustleton Avenue, Suite 104, Philadelphia PA (a/k/a "Bustleton"); and 49 Rolling Lane, Levittown PA (a/k/a "Levittown"). Rongione worked for defendant O'BRIEN at each of defendant O'BRIEN's office locations.

6. The Controlled Substances Act governs the manufacture, distribution, and dispensing of controlled substances in the United States. Under the Controlled Substances Act, there are five schedules of controlled substances – Schedules I, II, III, IV, and V. Controlled

substances are scheduled into these levels based upon their potential for abuse, among other things. For example, abuse of Schedule II controlled substances may lead to severe psychological or physical dependence. Abuse of Schedule III controlled substances may lead to moderate or low physical dependence or high psychological dependence. Abuse of Schedule IV controlled substances may lead to more limited physical dependence or psychological dependence relative to the drugs or other substances in Schedule III.

7. Oxycodone is an opioid medication that is similar to morphine and is classified as a Schedule II controlled substance. Oxycodone is used to treat moderate to severe pain. Oxycodone contains a narcotic and even if taken only in prescribed amounts, can cause physical and psychological dependence. At high doses, oxycodone can cause life threatening conditions or death, especially if used in combination with other narcotics or alcohol. Oxycodone is often used in combination pain relief drugs. For example, Percocet, which is a Schedule II controlled substance, is used to treat moderate to moderately severe pain, and contains two drugs, acetaminophen and 10 mg of oxycodone. Percocet is manufactured by numerous pharmaceutical companies under the following brand names: Endocet, Roxicet, Roxilox and Tylox.

8. Methadone is a synthetic opioid that is similar to heroin and is classified as a Schedule II controlled substance. Methadone is a highly addictive drug which can cause life-threatening conditions or death, especially if used in combination with other narcotics or alcohol. The primary use for methadone is for the prevention of withdrawal symptoms in patients addicted to opiate drugs. For this purpose, methadone must be administered in the context of a comprehensive treatment program, where the drug has been shown to decrease the rate of relapse to illicit opioids. Methadone also can be used to relieve severe pain in patients in

need of around the clock pain medication, and who cannot be safely and effectively treated with other medications.

9. Alprazolam, more commonly referred to by one of its brand names, Xanax, is the generic name for an addictive prescription sedative and anti-anxiety agent that is classified as a Schedule IV controlled substance.

10. 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 to knowingly or intentionally ... manufacture, distribute, or dispense, or possess with intent to manufacture, distribute or dispense, a controlled substance.”

11. Title 21, United States Code, Section 802(10), provides that the term “dispense” means to deliver a controlled substance to an ultimate user or research subject 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 delivery.

12. Title 21, United States Code, Section 821, provides that “[t]he Attorney General [of the United States] is authorized to promulgate rules and regulations relating to the registration and control of the manufacture, distribution and dispensing of controlled substances.”

13. The Attorney General of the United States has exercised his rulemaking authority regarding the dispensing of controlled substances through the promulgation of 21 Code of Federal Regulations § 1306.04, governing the issuance of prescriptions, which provides, among other things, that a prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice. Moreover, 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 section 309 of the Act [21 U.S.C. § 829] and the person knowingly filling such a purported prescription, as well as the person issuing it, shall be subject to the penalties provided for violations of the law relating to controlled substances.

14. The Pennsylvania Code of Professional and Vocational Standards, Title 49, Chapter 16.92, defines the authority of physicians licensed by the Commonwealth of Pennsylvania to prescribe or dispense controlled substances. Chapter 16.92 provides in pertinent part:

(a) A person licensed to practice medicine and surgery in this Commonwealth or otherwise licensed or regulated by the Board, when prescribing, administering or dispensing controlled substances, shall carry out, or cause to be carried out, the following minimum standards:

(1) Initial medical history and physical examination.... [B]efore commencing treatment that involves prescribing, administering or dispensing a controlled substance, an initial medical history shall be taken and an initial examination shall be conducted unless emergency circumstances justify otherwise. Alternatively, medical history and physical examination information recorded by another health care provider may be considered if the medical history was taken and the physical examination was conducted within the immediately preceding thirty days. The physical examination shall include an evaluation of the heart, lungs, blood pressure and body functions that relate to the patient's specific complaint.

(2) Reevaluations. Among the factors to be considered in determining the number and the frequency of follow-up evaluations that should be recommended to the patient are the condition diagnosed, the controlled substance involved, expected results and possible side effects. For chronic conditions, periodic follow-up evaluations shall be recommended to monitor the effectiveness of the controlled substance in achieving the intended results.

(3) Patient counseling. Appropriate counseling shall be given to the patient regarding the condition diagnosed and the controlled substance prescribed, administered or dispensed. Unless the patient is in an inpatient care setting, the patient shall be specifically counseled about dosage levels, instructions for use, frequency and duration of use and possible side effects.

(4) Medical Records. [C]ertain information shall be recorded in the patient's medical record on each occasion when a controlled substance is prescribed,

administered or dispensed. This information shall include the name of the controlled substance, its strength, the quantity and the date it was prescribed, administered or dispensed to a patient. The medical record shall also include a specification of the symptoms observed and reported, the diagnosis of the condition for which the controlled substance is being given and the directions given to the patient for the use of the controlled substance. If the same controlled substance continues to be prescribed, administered or dispensed, the medical record shall reflect changes in the symptoms observed and reported, in the diagnosis of the condition for which the controlled substance is being given and in the directions given to the patient.

15. As a doctor of osteopathic medicine, defendant WILLIAM J. O'BRIEN III was authorized to dispense to patients Schedules II, III, IV and V controlled substances and to prescribe medicine to patients, including controlled substances, for legitimate medical purposes and in the usual course of professional practice.

16. In actuality, defendant WILLIAM J. O'BRIEN III, with the assistance of Angela Rongione, ran a "pill mill" out of defendant O'BRIEN's offices, at which so-called "patients" could for a fee obtain prescriptions for controlled substances without there being any medical necessity for these controlled substances.

THE CONSPIRACY

17. From in or about July 2012 until in or about January 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

WILLIAM J. O'BRIEN III,

conspired and agreed together with Angela Rongione (charged elsewhere) to commit the following offenses against the United States:

a. to knowingly and intentionally distribute and dispense, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C); and

b. to knowingly and intentionally distribute and dispense, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

MANNER AND MEANS

It was part of the conspiracy that:

18. Defendant WILLIAM J. O'BRIEN III sold prescriptions for Schedule II, Schedule III, Schedule IV, and Schedule V controlled substances from his offices to cash-paying "patients" outside the usual course of professional practice and not for a legitimate medical purpose.

19. Defendant WILLIAM J. O'BRIEN III generally provided no physical examination or any other medical care or treatment before, or after, prescribing controlled substances in exchange for cash.

20. Defendant WILLIAM J. O'BRIEN III typically charged "patients" approximately \$250 cash for the first appointment to obtain prescriptions for controlled substances and approximately \$200 cash for each subsequent appointment. Defendant O'BRIEN and Angela Rongione referred to this as the "co-pay" to disguise the true nature of the payment.

21. Angela Rongione assisted defendant WILLIAM J. O'BRIEN III in operating his "pill mill" operation. Among other things, Rongione collected cash "co-pays," scheduled appointments for defendant O'BRIEN, and kept records of the prescriptions sold by defendant O'BRIEN.

22. Angela Rongione screened new "patients" for defendant WILLIAM J. O'BREIN III to ensure that the "patient" had been "referred" by an existing "patient" or was

otherwise known to defendant WILLIAM J. O'BRIEN III. For example, Person #1, who was cooperating in the investigation, and whose identity is known to the grand jury, told Rongione that "P.D.," who was a "patient" of defendant O'BRIEN at the time, had referred her to defendant O'BRIEN. Later, defendant O'BRIEN told Person #1 that he wanted to keep the practice "tight" to avoid raising "any flags." In exchange for cash, Person #1 obtained a prescription for narcotics from defendant O'BRIEN at the first appointment without there being a legitimate medical purpose.

23. After Person #1 had been a "patient" of defendant WILLIAM J. O'BRIEN for several months, Person #1 introduced Person #2 to Angela Rongione and to defendant O'BRIEN. Person #1 claimed that Person #2 was her niece. In actuality, Person #2 was a Special Agent of the FBI, acting in an undercover capacity. The same day that Person #1 made the introduction, Person #2 obtained an appointment with defendant O'BRIEN. In exchange for cash, defendant O'BRIEN prescribed narcotics for Person #2 at the first appointment without any legitimate medical purpose. In making his decision regarding how many oxycodone pills to prescribe to Person #2, defendant O'BRIEN asked Person #2, "if you had a big bowl of oxys, how many would you take in a day?"

24. Defendant WILLIAM J. O'BRIEN III generally falsified medical records for "patients" for whom he prescribed controlled substances. Defendant O'BRIEN documented medical charts to make it appear as if defendant O'BRIEN had conducted physical examinations and provided controlled substances for a legitimate medical purpose, when in fact he had not. For example, Person #1's chart reflects a diagnosis, made by defendant O'BRIEN, of post-traumatic cephalgia ("PTC"), a medical condition in which a patient suffers recurring headaches that are caused by a brain injury. Person #1 did not indicate to defendant O'BRIEN that she had

experienced a brain injury. Rather, Person #1 told defendant O'BRIEN that she had headaches, but attributed her headaches to "stress" from living with her elderly mother and from her job as a waitress. Person #1 joked with defendant O'BRIEN that narcotics and alcohol, which are contraindicated, helped her to manage stress.

25. To avoid detection by law enforcement, "patients" of defendant WILLIAM J. O'BRIEN III were instructed to fill narcotics prescriptions purchased from defendant O'BRIEN at pharmacies located at a distance from defendant O'BRIEN's offices. For example, Angela Rongione directed Person #1 to fill her prescriptions in the Roxborough area, where Person #1 claimed to reside, which was approximately 30 miles away from the Bustleton office where Person #1 had obtained prescriptions for controlled substances from defendant O'BRIEN.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendant WILLIAM J. O'BRIEN III and Angela Rongione, charged elsewhere, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about January 30, 2014, in Philadelphia, defendant WILLIAM J. O'BRIEN III knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, by selling a prescription for Percocet to Person #1.

2. On or about January 30, 2014, in Philadelphia, Angela Rongione collected \$200 cash from Person #1 before escorting Person #1 to a private room to obtain prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III. Rongione instructed

Person #1 to fill the prescriptions from defendant O'BRIEN at a pharmacy near where Person #1 resided, and not at a pharmacy located near the Bustleton office.

3. On or about the dates listed below, in Philadelphia, defendant WILLIAM J. O'BRIEN III knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, by selling prescriptions for oxycodone to Person #1 as follows:

APPROXIMATE DATE OF PRESCRIPTION	QUANTITY (20 mg Tablets)	QUANTITY (30 mg Tablets)
April 3, 2014	60	
April 24, 2014	60	
May 15, 2014	90	
June 2, 2014	90	
June 19, 2014	90	
July 10, 2014	120	
August 7, 2014	-	90
August 28, 2014	-	120
September 18, 2014	-	120
October 9, 2014	-	120
October 30, 2014	-	120

4. On or about April 3, 2014, April 24, 2014, and October 9, 2014, in Philadelphia, Angela Rongione collected \$200 cash from Person #1 before directing Person #1 to a private room to obtain prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III.

5. On or about the dates listed below, in Philadelphia, defendant WILLIAM J. O'BRIEN III knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, by selling

prescriptions for oxycodone to Person #2 as follows:

APPROXIMATE DATE OF PRESCRIPTION	QUANTITY (30 mg Tablets)
August 7, 2014	120
September 4, 2014	120
October 2, 2014	180
October 30, 2014	180
November 24, 2014	180

6. On or about August 7, 2014, in Philadelphia, Angela Rongione collected \$250 cash from Person #2 who posed as a “walk-in” patient seeking controlled substances. Rongione advised Person #2 that each subsequent appointment with defendant WILLIAM J. O’BRIEN III would cost \$200 cash. After she collected the cash, Rongione escorted Person #2 to a private room to obtain prescriptions for controlled substances from defendant O’BRIEN.

7. On or about the dates listed below, in Philadelphia, defendant WILLIAM J. O’BRIEN III knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, by selling prescriptions for Xanax to Person #1, as follows:

APPROXIMATE DATE OF PRESCRIPTION	QUANTITY	REFILLS	TOTAL QUANTITY
May 15, 2014	40	1	80
June 2, 2014	60	5	360
June 19, 2014	90	5	540
September 4, 2014	60	-	60
October 2, 2014	60	-	60
October 30, 2014	60	-	60
November 20, 2014	60	-	60
November 24, 2014	60	-	60

8. On or about the dates listed below, in Philadelphia, defendant WILLIAM J. O'BRIEN III knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, by selling prescriptions for Xanax to Person #2, as follows:

APPROXIMATE DATE OF PRESCRIPTION	QUANTITY
September 4, 2014	60
October 2, 2014	60
October 30, 2014	60
November 24, 2014	60

9. As part of the continuing conspiracy, defendant WILLIAM J. O'BRIEN III also was willing to exchange sexual favors for prescriptions and for higher doses of narcotics. For example, on or about October 2, 2014 in a tape recorded meeting with Person #2, who was an undercover FBI agent, defendant O'BRIEN offered to trade a prescription for oral sex.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO
(Conspiracy to Distribute Controlled Substances)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 16 and 18 through 25 of Count One are incorporated here.

2. Beginning in or around at least March 2012, the exact date unknown, defendant JOSEPH MEHL, who was employed as a tow truck driver, referred individuals involved in automobile accidents to defendant WILLIAM J. O'BRIEN III in exchange for prescriptions for controlled substances. Defendant O'BRIEN prescribed controlled substances for defendant MEHL outside the usual course of professional practice and not for a legitimate medical purpose.

3. Defendant JOSEPH MEHL introduced S.N. to defendant WILLIAM J. O'BRIEN III. S.N., who is now deceased and whose identity is known to the grand jury, was a member of the Pagans, an outlaw motorcycle gang known for violence and drug dealing. Through his connection to the Pagans, S.N. had access to illegal drug distributors. Defendant O'BRIEN and S.N. developed a scheme whereby so-called "patients," including S.N. and others who were recruited by S.N., or recruited by others at S.N.'s direction, would obtain medically unnecessary prescriptions for controlled substances from defendant O'BRIEN in exchange for cash. With cash-paying "patients," defendant O'BRIEN could conceal money from, among others, creditors and the United States Bankruptcy Court.

4. After filling the prescriptions, the "patients" would turn the pills over to S.N., or to others at S.N.'s direction. S.N., or others at S.N.'s direction, would sell the pills to

drug dealers. Certain controlled substances, such as oxycodone (30 mg), were in high demand by drug dealers. One oxycodone (30 mg) pill could sell for at least approximately \$25 on the street.

5. S.N. recruited defendants MICHAEL THOMPSON and PETER MARRANDINO to assist him and defendant WILLIAM J. O'BRIEN III to further the scheme. Defendants THOMPSON and MARRANDINO obtained prescriptions from defendant O'BRIEN, for themselves and others whom they recruited, for large quantities of controlled substances for resale.

6. To further expand the drug trafficking conspiracy, defendant MICHAEL THOMPSON permitted other individuals, referred to here as "recruiters," to procure their own "patients" who would work directly for the "recruiters." These "patients" were allowed to obtain prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III in the same manner as defendant THOMPSON, so long as the "recruiters" paid defendant THOMPSON a share of their profits.

7. Defendant CHARLES JOHNSON was a "recruiter" for defendant MICHAEL THOMPSON. Defendant JOHNSON procured "patients" who obtained medically unnecessary prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III for resale.

8. Defendant FRANK CORAZO, JR. was initially recruited as a "patient" by defendant MICHAEL THOMPSON. Subsequently, defendant THOMPSON put defendant CORAZO in charge of defendant THOMPSON's "patient" group.

9. Defendant PATRICK TREACY and defendant JOSEPH MITCHELL, SR., as Pagan members, had access to defendant WILLIAM J. O'BRIEN III and participated in

the conspiracy. Like S.N., defendants TREACY and MITCHELL had access to drug trafficking networks through their association with the Pagans. Defendants TREACY and MITCHELL obtained medically unnecessary prescriptions from defendant WILLIAM J. O'BRIEN III for large quantities of controlled substances for resale.

10. Defendant PATRICK TREACY recruited defendant JENNIFER LYNN CHAMBERS, his then-girlfriend, to obtain medically unnecessary prescriptions from defendant WILLIAM J. O'BRIEN III for large quantities of controlled substances for resale.

THE CONSPIRACY

11. From in or about March 2012, the exact date being unknown, through in or about January 2015, in the Eastern District of Pennsylvania, and elsewhere, defendants

**WILLIAM J. O'BRIEN III,
MICHAEL THOMPSON,
a/k/a "Mikey,"
a/k/a "Tomato Pie,"
PETER MARRANDINO,
a/k/a "Petey Adams,"
a/k/a "Nose,"
JOSEPH MEHL,
a/k/a "Joseph Montanero,"
JOSEPH MITCHELL, SR.,
PATRICK TREACY,
a/k/a "Redneck,"
CHARLES JOHNSON,
FRANK CORAZO, JR.,
a/k/a "Stalker," and
JENNIFER LYNN CHAMBERS,
a/k/a "Jennilynn,"**

conspired and agreed together, and with Angela Rongione (charged elsewhere), and with others known and unknown to the grand jury, to commit the following offenses against the United States:

- a. to knowingly and intentionally distribute and dispense, outside the usual

course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C);

b. to knowingly and intentionally distribute and dispense, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C); and

c. to knowingly and intentionally distribute and dispense, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

MANNER AND MEANS

It was part of the conspiracy that:

12. Defendant MICHAEL THOMPSON recruited “patients” in furtherance of the conspiracy. Defendant THOMPSON provided a list to Angela Rongione, or another member of defendant WILLIAM J. O’BRIEN III’s office staff, containing the names of recruited “patients” for whom defendant O’BRIEN would write prescriptions for controlled substances. Angela Rongione, or another employee at her direction, retrieved medical charts for the “patients” on the list for defendant O’BRIEN. Many of the individuals on defendant THOMPSON’s list had either never been to the offices of defendant O’BRIEN, or were rarely present when the prescriptions were sold to defendant THOMPSON. Consequently, the “patient” charts contained false information regarding medical treatment purportedly provided by defendant O’BRIEN that in fact was not provided. Defendant THOMPSON obtained medically

unnecessary prescriptions for controlled substances in his name and in the names of recruited “patients” from defendant O’BRIEN approximately every two weeks. To maximize his profits, defendant THOMPSON, a Pennsylvania Medicaid beneficiary, used his Medicaid insurance benefit to pay for his medically unnecessary prescriptions for controlled substances obtained from defendant O’BRIEN.

13. Defendant MICHAEL THOMPSON permitted Persons #3 and #4, whose identities are known to the grand jury, to establish their own groups of recruited “patients.” Person #3 and #4, among others, paid a portion of their profits to defendant THOMPSON. For their “patients,” Persons #3 and #4 paid the required \$200 cash “co-pay” to defendant WILLIAM J. O’BRIEN III and also paid the pharmacy its charge to fill the prescriptions. The “patients” routinely obtained prescriptions for controlled substances from defendant O’BRIEN without there being any medical necessity for these controlled substances. After obtaining the prescriptions, the “patients” had the prescriptions filled at a pharmacy and then turned the pills over to their “recruiter” for a fee. The controlled substances would be resold to a drug dealer at a profit. Persons #3 and #4, among others, obtained medically unnecessary prescriptions for controlled substances from defendant O’BRIEN approximately every two weeks.

14. To reduce his visibility at the offices of defendant WILLIAM J. O’BRIEN III, defendant MICHAEL THOMPSON appointed defendant FRANK CORAZO, JR., who was a “patient” for defendant THOMPSON, to act as his surrogate. Beginning in or around July 2013, defendant CORAZO would provide defendant THOMPSON’s list of names of recruited “patients” to Angela Rongione, or another member of the office staff; defendant O’BRIEN then wrote prescriptions for controlled substances in the names of the “patients” on defendant THOMPSON’s list, and provided the medically unnecessary prescriptions to defendant

CORAZO. Each time he obtained prescriptions, defendant CORAZO would pay defendant O'BRIEN \$200 in cash for each name on his list. Defendant CORAZO obtained medically unnecessary prescriptions for controlled substances from defendant O'BRIEN approximately every two weeks. To maximize his profits, defendant CORAZO, a Pennsylvania Medicaid beneficiary, used his Medicaid insurance benefit to pay for his medically unnecessary prescriptions for controlled substances obtained from defendant O'BRIEN.

15. As part of his compensation, defendant FRANK CORAZO, JR. also would obtain medically unnecessary prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III, for himself and for his 82-year-old father, who was not even a patient of defendant O'BRIEN. For example, on or about June 16, 2014, defendant CORAZO obtained from defendant O'BRIEN, identical prescriptions for himself and his father for 120 oxycodone (30 mg) pills; 120 Percocet (10 mg) pills; and 120 alprazolam (2 mg) pills with five refills. On that same date, in addition to these large quantities of controlled substances, defendant O'BRIEN also prescribed 300 methadone (10 mg) pills for defendant CORAZO.

16. Defendant FRANK CORAZO, JR. also bought pills from other "recruiters" who had been sponsored by defendant MICHAEL THOMPSON, and whose "patients" obtained prescriptions for them from defendant WILLIAM J. O'BRIEN III. Defendant CORAZO typically paid the "recruiter" \$800 in cash, which included a reimbursement for the fee paid to defendant O'BRIEN, for 120 oxycodone (30 mg) pills.

17. Defendant CHARLES JOHNSON "recruited" Persons #5 and #6, whose identities are known to the grand jury, among others, both of whom obtained medically unnecessary prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III in exchange for cash. After the prescriptions were filled, defendant JOHNSON sold the pills to

drug dealers. Person #5 was the mother of defendant JOHNSON's child. Person #6 was defendant JOHNSON's girlfriend.

18. Defendant MICHAEL THOMPSON had full access to the "patient" charts maintained at the offices of defendant WILLIAM J. O'BRIEN III. Defendant THOMPSON used the "patient" charts to audit the activity of others involved in the drug distribution scheme. For example, defendant THOMPSON collected a fee from the "recruiter" for, among others, those "patients" whose chart indicated that "Mike" or "Mike Thompson" had made the referral. By reviewing "patient" charts, defendant THOMPSON determined whether the "recruiter" was withholding money from him.

19. Defendant PETER MARRANDINO recruited "patients" in furtherance of the conspiracy. Defendant MARRANDINO provided a list to Angela Rongione, or another member of the office staff, containing the names of recruited "patients," defendant WILLIAM J. O'BRIEN III then wrote medically unnecessary prescriptions for controlled substances in the names of the "patients" on defendant MARRANDINO's list. Angela Rongione, or another employee at her direction, retrieved medical charts for the "patients" on the list for defendant O'BRIEN. Many of the individuals on defendant MARRANDINO's list had either never been to the offices of defendant O'BRIEN, or were rarely present when the prescriptions were sold to defendant MARRANDINO. Consequently, the "patient" charts contained false information regarding medical treatment purportedly provided by defendant O'BRIEN that in fact was not provided. When defendant MARRANDINO obtained prescriptions for controlled substances from defendant O'BRIEN, he paid defendant O'BRIEN approximately \$200 in cash for each recruited "patient." Defendant MARRANDINO obtained medically unnecessary prescriptions for controlled substances for himself and in the names of recruited "patients" from defendant

O'BRIEN approximately every two weeks.

20. Defendant PATRICK TREACY regularly obtained medically unnecessary prescriptions for large quantities of controlled substances from defendant WILLIAM J. O'BRIEN III for resale. The Pagans members, like defendant TREACY, generally obtained their prescriptions at the Levittown office. Defendant O'BRIEN provided the Pagans members with a separate entrance. Defendant O'BRIEN referred to defendant TREACY and his associates as his "VIP" patients. Occasionally, defendant O'BRIEN brought prescriptions for controlled substances to defendant TREACY while defendant TREACY waited outside the office in his car.

21. Defendant PATRICK TREACY, a 48-year-old man, mockingly reported on the medical history form for his initial visit with defendant WILLIAM J. O'BRIEN III that he had been pregnant "lots" of times; that he was menstruating; and that recently he had a "PAP" test, which screens for cervical cancer. Notwithstanding the obvious lack of any credible medical information regarding defendant TREACY, defendant O'BRIEN sold defendant TREACY prescriptions for 240 oxycodone (30 mg) pills and 60 Xanax (2 mg) pills at his first visit.

22. From in or around March 2012 through in or around January 2015, defendant PATRICK TREACY obtained medically unnecessary prescriptions for large quantities of controlled substances for resale from defendant WILLIAM O'BRIEN III for at least approximately 5,280 oxycodone (30 mg) pills; 2,880 oxycodone (15 mg) pills; approximately 1,700 Percocet (10 mg) pills; and 1,410 methadone (10 mg) pills.

23. In furtherance of the conspiracy, defendant PATRICK TREACY permitted "business" associates to have access to defendant WILLIAM J. O'BRIEN III to obtain

prescriptions for controlled substances. Defendant TREACY received income or other benefits from these arrangements. For example, defendant TREACY “hooked up John at 7th and Morris with the Doc.” Defendant TREACY claimed that this arrangement generated “\$3,000 every two weeks.”

24. Defendant PATRICK TREACY recruited defendant JENNIFER LYNN CHAMBERS to obtain medically unnecessary prescriptions for large quantities of controlled substances for resale from defendant WILLIAM J. O’BRIEN III. From in or around February 2014 through in or around May 2014, defendant CHAMBERS obtained approximately 360 oxycodone (30 mg) pills and approximately 180 oxycodone (15 mg) pills.

25. Defendant JOSEPH MITCHELL, SR., another Pagans member, regularly obtained medically unnecessary prescriptions for large quantities of controlled substances for resale from defendant WILLIAM J. O’BRIEN III. From in or around September 2012 through in or around April 2014, defendant MITCHELL obtained prescriptions from defendant O’BRIEN for approximately 3,855 oxycodone (30 mg) pills; approximately 3,220 Percocet (10 mg) pills; and approximately 3,780 methadone (10 mg) pills.

26. Defendant JOSEPH MITCHELL, SR. recruited his 18-year-old son to obtain medically unnecessary prescriptions for controlled substances from defendant WILLIAM J. O’BRIEN III. From in or around January 2013 through in or around November 2013, defendant O’BRIEN provided prescriptions to defendant MITCHELL in the name of defendant MITCHELL’s son for approximately 1,400 oxycodone (30 mg) pills; 120 Percocet (10 mg) pills; and 120 methadone (10 mg) pills for resale.

27. Defendant JOSEPH MEHL recruited “patients,” including so-called “accident patients,” for defendant WILLIAM J. O’BRIEN III. Defendant O’BRIEN submitted

claims for medical treatment to the “accident patient’s” automobile insurance provider for the personal injury protection (“PIP”) coverage legally mandated by the state. The PIP mandate in Pennsylvania was \$5,000. In exchange, defendant O’BRIEN wrote medically unnecessary prescriptions for controlled substances for defendant MEHL and his wife and brother-in law, identified respectively as Persons #7 and #8, whose identities are known to the grand jury. The “accident patients” also were prescribed controlled substances by defendant O’BRIEN. After the PIP was exhausted, defendant O’BRIEN transferred the “accident” patients to his “pain management” practice. To continue to obtain prescriptions for controlled substances, each “patient” was required to pay defendant O’BRIEN \$200 in cash at each visit.

28. Defendant JOSEPH MEHL regularly obtained medically unnecessary prescriptions from defendant WILLIAM J. O’BRIEN III for large quantities of controlled substances for resale. From in or around April 2012 through in or around January 2015, defendant MEHL, and Persons #7 and #8, obtained prescriptions from defendant O’BRIEN for approximately 11,980 oxycodone (30 mg) pills; 760 Percocet (10 mg) pills; and approximately 13,140 methadone (10 mg) pills.

29. Defendant JOSEPH MEHL recruited dancers from Philadelphia-area men’s clubs, including Oasis Gentlemen’s Club, which was frequented by Pagans members, to obtain medically unnecessary prescriptions for controlled substances from defendant WILLIAM J. O’BRIEN III. Defendant MEHL would typically pay the pharmacy fee and take a portion of the “patient’s” pills for himself. Defendant O’BRIEN would offer prescriptions for controlled substances in exchange for sex. For example, in order to obtain prescriptions for controlled substances, Persons #9 and #10, “patients” of defendant O’BRIEN whose identities are known to the grand jury, would perform oral sex on defendant O’BRIEN.

30. During the period from in or around March 2012 through in or around January 2015, in furtherance of the conspiracy, defendant WILLIAM J. O'BRIEN III unlawfully dispensed and distributed to defendants MICHAEL THOMPSON, PETER MARRANDINO, JOSEPH MEHL, JOSEPH MITCHELL, SR., PATRICK TREACY, CHARLES JOHNSON, FRANK CORAZO, JR., and JENNIFER LYNN CHAMBERS and their designees, at least approximately 238,895 oxycodone (30 mg) pills; approximately 11,649 oxycodone (15 mg) pills; approximately 128,370 oxycodone (10 mg) pills (also known as Percocet); and approximately 160,492 methadone (10 mg) pills, all Schedule II controlled substances, all of which were prescribed by defendant O'BRIEN outside the course of professional practice and not for a legitimate medical purpose.

31. From in or around March 2012 through in or around January 2015, the estimated street value of the controlled substances sold by the conspiracy was at least approximately \$5,000,000. Defendant WILLIAM J. O'BRIEN III generated for himself at least approximately \$2,000,000 in cash proceeds from the drug trafficking conspiracy.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants WILLIAM J. O'BRIEN III, MICHAEL THOMPSON, PETER MARRANDINO, JOSEPH MEHL, JOSEPH MITCHELL, SR., PATRICK TREACY, CHARLES JOHNSON, FRANK CORAZO, JR., and JENNIFER LYNN CHAMBERS committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about the dates listed below, each date constituting a separate overt act, defendant WILLIAM J. O'BRIEN III knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and not for a legitimate medical purpose, a

mixture and substance containing a detectable amount of oxycodone, Schedule II controlled substance, by providing medically unnecessary prescriptions to Angela Rongione, as compensation for Rongione's services in furtherance of the conspiracy.

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
February 2, 2014	oxycodone (30 mg)	120
February 17, 2014	oxycodone (30 mg)	120
March 3, 2014	oxycodone (30 mg)	120
March 17, 2014	oxycodone (30 mg)	120
March 31, 2014	oxycodone (30 mg)	120
April 14, 2014	oxycodone (30 mg)	120
April 28, 2014	oxycodone (30 mg)	120
May 12, 2014	oxycodone (30 mg)	120
May 19, 2014	oxycodone (30 mg)	120
June 23, 2014	oxycodone (30 mg)	120
July 8, 2014	oxycodone (30 mg)	240
August 4, 2014	oxycodone (30 mg)	240
August 27, 2014	oxycodone (30 mg)	240
September 30, 2014	oxycodone (30 mg)	180

2. On or about the dates listed below, each date constituting a separate overt act, defendant MICHAEL THOMPSON knowingly and intentionally obtained prescriptions in his name from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional practice and not for a legitimate medical purpose, containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance, for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
August 2, 2012	Percocet	120
August 6, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
September 17, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
October 1, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
October 15, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
November 1, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
November 12, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
November 26, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
December 10, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
December 19, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
December 26, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
January 16, 2013	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
January 23, 2013	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
February 11, 2013	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
February 26, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
March 11, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
March 25, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
April 5, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
April 12, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
April 18, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
May 2, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
May 13, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	360 360 360
July 8, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
July 22, 2013	methadone (10 mg) oxycodone (30 mg)	120 120
August 5, 2013	methadone (10 mg) oxycodone (30 mg)	120 120

3. On or about the dates listed below, each date constituting a separate overt act, defendant FRANK CORAZO, JR. knowingly and intentionally obtained prescriptions in his name from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional practice and not for a legitimate medical purpose, containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance

containing a detectable amount of methadone, a Schedule II controlled substance, for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
September 17, 2012	methadone (10 mg)	225
	oxycodone (30 mg)	120
October 1, 2012	methadone (10 mg)	225
	oxycodone (30 mg)	120
October 15, 2012	methadone (10 mg)	225
	oxycodone (30 mg)	120
	Percocet	120
November 1, 2012	methadone (10 mg)	225
	oxycodone (30 mg)	120
	Percocet	120
November 12, 2012	methadone (10 mg)	225
	oxycodone (30 mg)	120
	Percocet	120
November 26, 2012	methadone (10 mg)	225
	oxycodone (30 mg)	120
	Percocet	120
December 10, 2012	methadone (10 mg)	225
	oxycodone (30 mg)	120
	Percocet	120
December 19, 2012	methadone (10 mg)	450
	oxycodone (30 mg)	240
	Percocet	120
December 26, 2012	Percocet	120
January 9, 2013	Percocet	120
January 16, 2013	methadone (10 mg)	225
	oxycodone (30 mg)	120
January 23, 2013	Percocet	120
January 30, 2013	methadone (10 mg)	225
	oxycodone (30 mg)	120
February 05, 2013	Percocet	120
February 13, 2013	methadone (10 mg)	225
	oxycodone (30 mg)	120
February 19, 2013	Percocet	120
February 26, 2013	methadone (10 mg)	225
	oxycodone (30 mg)	120
March 4, 2013	Percocet	120

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
March 11, 2013	methadone (10 mg) oxycodone (30 mg)	225 120
March 18, 2013	Percocet	120
March 25, 2013	methadone (10 mg) oxycodone (30 mg)	225 120
April 2, 2013	Percocet	120
April 5, 2013	methadone (10 mg) oxycodone (30 mg)	225 120
April 12, 2013	Percocet	120
April 18, 2013	methadone (10 mg) oxycodone (30 mg)	225 120
April 24, 2013	Percocet	120
May 2, 2013	methadone (10 mg) oxycodone (30 mg)	120 180
May 13, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	450 240 240
May 30, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	450 240 240
July 8, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	225 120 120
July 22, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	225 120 120
August 5, 2013	methadone (10 mg) oxycodone (30 mg)	225 120
August 8, 2013	Percocet	120
August 15, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	225 120 120
August 26, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	225 120 120
September 5, 2013	methadone (10 mg)	225
September 16, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	225 120 120

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
September 27, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	225 120 120
October 11, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	225 120 120
October 30, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	450 240 240
November 26, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	450 240 240
January 6, 2014	methadone (10 mg) oxycodone (30 mg)	600 240
January 29, 2014	Percocet	80
February 10, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 80
March 6, 2014	methadone (10 mg) oxycodone (30 mg)	300 120
March 24, 2014	methadone (10 mg) oxycodone (30 mg)	300 120
April 14, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
April 28, 2014	methadone (10 mg) oxycodone (30 mg)	300 120
May 19, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	450 180 120
June 16, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
July 7, 2014	methadone (10 mg) oxycodone (30 mg)	300 120
July 14, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
August 4, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY

August 25, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	600 240 240
October 6, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
October 27, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
November 17, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
December 8, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
December 18, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
December 22, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120
January 19, 2015	methadone (10 mg) oxycodone (30 mg) Percocet	300 120 120

4. On or about the dates listed below, each date constituting a separate overt act, defendant PETER MARRANDINO knowingly and intentionally obtained prescriptions in his name from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional practice and not for a legitimate medical purpose, containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance, for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
August 14, 2012	methadone (10 mg) oxycodone (30 mg)	120 120

September 5, 2012	Percocet	120
October 9, 2012	oxycodone (30 mg)	120
	Percocet	120
October 24, 2012	oxycodone (30 mg)	120
	Percocet	120
November 6, 2012	oxycodone (30 mg)	120
	Percocet	120
December 10, 2012	Percocet	120
December 12, 2012	oxycodone (30 mg)	120
December 26, 2012	oxycodone (30 mg)	120
	Percocet	120
January 15, 2013	oxycodone (30 mg)	120
	Percocet	120
January 28, 2013	oxycodone (30 mg)	120
	Percocet	120
February 6, 2013	oxycodone (30 mg)	120
	Percocet	120
February 25, 2013	oxycodone (30 mg)	120
	Percocet	120
March 11, 2013	oxycodone (30 mg)	120
March 25, 2013	methadone (10 mg)	120
April 10, 2013	oxycodone (30 mg)	120
	Percocet	120
April 22, 2013	oxycodone (30 mg)	120
	Percocet	120
May 6, 2013	oxycodone (30 mg)	120
	Percocet	120
May 20, 2013	oxycodone (30 mg)	120
	Percocet	120
May 31, 2013	oxycodone (30 mg)	120
	Percocet	120
June 13, 2013	oxycodone (30 mg)	120
	Percocet	120
July 8, 2013	oxycodone (30 mg)	120
	Percocet	120
July 22, 2013	oxycodone (30 mg)	120
	Percocet	120
August 5, 2013	oxycodone (30 mg)	120
	Percocet	120
APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
August 19, 2013	oxycodone (30 mg)	120
	Percocet	120
September 3, 2013	oxycodone (30 mg)	120
	Percocet	120
September 16, 2013	oxycodone (30 mg)	120
	Percocet	120

September 30, 2013	oxycodone (30 mg) Percocet	120 120
October 14, 2013	oxycodone (30 mg) Percocet	120 120
October 28, 2013	oxycodone (30 mg) Percocet	120 120
November 13, 2013	oxycodone (30 mg) Percocet	120 120
November 27, 2013	oxycodone (30 mg) Percocet	120 90
December 19, 2013	methadone (10 mg) oxycodone (30 mg)	120 120
January 26, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
February 15, 2014	methadone (10 mg) oxycodone (30 mg)	120 120

5. On or about the dates listed below, each date constituting a separate overt act, defendant PATRICK TREACY knowingly and intentionally obtained prescriptions from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional practice and not for a legitimate medical purpose, containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance, for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
March 1, 2012	oxycodone (30 mg)	240
March 22, 2012	oxycodone (30 mg)	240

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
September 19, 2012	oxycodone (30 mg) Percocet	120 120
September 27, 2012	oxycodone (15 mg)	60
October 3, 2012	oxycodone (30 mg) Percocet	120 120
October 11, 2012	oxycodone (30 mg) Percocet	120 120
November 1, 2012	oxycodone (30 mg) Percocet	120 120
November 6, 2012	methadone (10 mg) oxycodone (30 mg)	120 120
November 12, 2012	methadone (10 mg)	90
November 20, 2012	methadone (10 mg) oxycodone (30 mg)	90 120
December 4, 2012	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
December 11, 2012	oxycodone (30 mg) Percocet	240 240
January 15, 2013	oxycodone (30 mg) Percocet	240 240
January 29, 2013	oxycodone (30 mg) Percocet	120 120
February 11, 2013	methadone (10 mg) oxycodone (30 mg)	120 120
February 25, 2013	oxycodone (30 mg) Percocet	120 120
March 11, 2013	methadone (10 mg) oxycodone (30 mg)	150 90
March 25, 2013	methadone (10 mg) oxycodone (30 mg)	120 120
April 22, 2013	oxycodone (30 mg) Percocet	120 120
May 6, 2013	oxycodone (30 mg) Percocet	120 120
May 21, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
June 4, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
July 16, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY

July 29, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 90
August 13, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
August 21, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
September 3, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
September 18, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
September 25, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
December 3, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
December 24, 2013	oxycodone (30 mg) oxycodone (15 mg)	120 120
January 7, 2014	oxycodone (30 mg) oxycodone (15 mg)	120 120
February 11, 2014	oxycodone (30 mg) oxycodone (15 mg)	120 120
March 11, 2014	oxycodone (30 mg) oxycodone (15 mg)	120 120
April 1, 2014	oxycodone (30 mg) oxycodone (15 mg)	120 120
April 16, 2014	oxycodone (30 mg) oxycodone (15 mg)	120 120
May 6, 2014	oxycodone (30 mg) oxycodone (15 mg)	240 240
November 11, 2014	methadone (10 mg) oxycodone (30 mg) oxycodone (15 mg)	120 120 120
December 16, 2014	methadone (10 mg) oxycodone (30 mg) oxycodone (15 mg)	120 120 120
January 7, 2015	methadone (10 mg) oxycodone (30 mg) oxycodone (15 mg)	120 120 120
January 28, 2015	methadone (10 mg) oxycodone (30 mg) oxycodone (15 mg)	120 120 120

6. On or about the dates listed below, each date constituting a separate overt act, defendant JOSEPH MITCHELL, SR. knowingly and intentionally obtained prescriptions in his name from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional

practice and not for a legitimate medical purpose, containing a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance, for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
August 20, 2012	methadone (10 mg)	90
	oxycodone (30 mg)	90
September 13, 2012	methadone (10 mg)	90
	oxycodone (30 mg)	90
October 1, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
October 15, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
November 1, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
November 12, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
November 26, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
December 11, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
December 26, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
January 8, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
January 23, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
February 5, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
February 19, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
March 11, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
March 29, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
April 12, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
April 24, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
May 8, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
May 22, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
June 25, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
July 9, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 120
July 24, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 90

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
August 13, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 90
August 28, 2013	oxycodone (30 mg) Percocet	120 120
October 1, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 90
October 14, 2013	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 90
October 29, 2013	methadone (10 mg) Percocet	120 120
November 12, 2013	methadone (10 mg) Percocet	120 90
February 25, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 80
April 9, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 80
April 30, 2014	methadone (10 mg) oxycodone (30 mg) Percocet	120 120 80

7. In or around May 2014, defendant WILLIAM J. O'BRIEN III, at the direction of defendant MICHAEL THOMPSON, "discharged" defendant JOSEPH MITCHELL, SR. from his practice. The abrupt "discharge" left defendant MITCHELL without a source of controlled substances for resale. Defendant MITCHELL complained to defendant PATRICK TREACY that he had been "cut off from the doc" at the direction of defendant THOMPSON. As a result of losing income from his role in the conspiracy, defendant MITCHELL was "forced" to seek legitimate employment. Defendant MITCHELL complained to defendant TREACY that "workin' every day . . . is for the birds . . . ain't for Pagans."

8. On or about the dates listed below, each date constituting a separate overt act, defendant CHARLES JOHNSON knowingly and intentionally obtained prescriptions in his name from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance, for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
October 28, 2013	oxycodone (30 mg)	120
	Percocet	120
November 12, 2013	methadone (10 mg)	90
	oxycodone (30 mg)	90
	Percocet	90
November 26, 2013	methadone (10 mg)	90
	oxycodone (30 mg)	90
	Percocet	90
December 17, 2013	methadone (10 mg)	120
	oxycodone (30 mg)	120
January 7, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
January 28, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
February 18, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
March 11, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
April 1, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
April 22, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
May 13, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
June 3, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120
June 25, 2014	methadone (10 mg)	120
	oxycodone (30 mg)	120

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
July 15, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
August 5, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
August 26, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
September 17, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
October 8, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
October 28, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
November 18, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
December 9, 2014	methadone (10 mg) oxycodone (30 mg)	120 120
January 6, 2015	methadone (10 mg) oxycodone (30 mg)	120 120
January 28, 2015	methadone (10 mg) oxycodone (30 mg)	120 120

9. On or about the dates listed below, each date constituting a separate overt act, defendant JOSEPH MEHL knowingly and intentionally obtained prescriptions from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional practice and not for a legitimate medical purpose, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance, for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
July 12, 2012	methadone (10 mg)	120
July 16, 2012	methadone (10 mg)	180
July 19, 2012	methadone (10 mg) oxycodone (30 mg)	120 120
APPROXIMATE DATE OF	DRUG	QUANTITY

PRESCRIPTION		
July 26, 2012	methadone (10 mg)	135
August 6, 2012	methadone (10 mg)	120
August 9, 2012	oxycodone (30 mg)	120
August 20, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	180
	Percocet	100
September 10, 2012	methadone (10 mg)	240
	oxycodone (30 mg)	120
September 17, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
September 19, 2012	oxycodone (30 mg)	120
	Percocet	120
September 26, 2012	methadone (10 mg)	180
	oxycodone (30 mg)	180
October 1, 2012	methadone (10 mg)	75
	oxycodone (30 mg)	120
	Percocet	75
October 15, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	75
October 25, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
	Percocet	120
November 5, 2012	methadone (10 mg)	120
	oxycodone (30 mg)	120
November 19, 2012	methadone (10 mg)	90
	oxycodone (30 mg)	120
January 9, 2013	methadone (10 mg)	90
	oxycodone (30 mg)	90
January 22, 2013	methadone (10 mg)	120
	oxycodone (30 mg)	90
March 18, 2013	oxycodone (30 mg)	90
April 3, 2013	oxycodone (30 mg)	90
	Percocet	
April 23, 2013	methadone (10 mg)	90
	oxycodone (30 mg)	90
May 7, 2013	methadone (10 mg)	120
	oxycodone (30 mg)	90
May 21, 2013	methadone (10 mg)	120
	oxycodone (30 mg)	90

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
June 4, 2013	methadone (10 mg) oxycodone (30 mg)	120 90
June 18, 2013	methadone (10 mg) oxycodone (30 mg)	120 90
July 22, 2013	methadone (10 mg) oxycodone (30 mg)	120 90

10. On or about July 26, 2012, in furtherance of the conspiracy, defendant JOSEPH MEHL recruited Person #7 to obtain prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III outside the usual course of professional practice and not for a legitimate medical purpose. From on or about July 26, 2012 through on or about January 21, 2015, Person #7 obtained prescriptions for approximately 7,110 oxycodone (30 mg) pills; and approximately 9,780 methadone (10 mg) pills, both Schedule II controlled substances for the purpose of resale.

11. On or about May 14, 2014, in furtherance of the conspiracy, defendant JOSEPH MEHL recruited Person #8 to obtain prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III outside the usual course of professional practice and not for a legitimate medical purpose. From on or about May 14, 2014 through on or about January 21, 2015, Person #8 obtained prescriptions for approximately 4,440 oxycodone (30 mg) pills; and approximately 1,200 methadone (10 mg) pills, both Schedule II controlled substances for the purpose of resale.

12. On or about the dates listed below, each date constituting a separate overt act, defendant JENNIFER LYNN CHAMBERS knowingly and intentionally obtained prescriptions from defendant WILLIAM J. O'BRIEN III, outside the usual course of professional

practice and not for a legitimate medical purpose, for a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance for the purpose of resale:

APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
February 11, 2014	oxycodone (30 mg)	60
February 25, 2014	oxycodone (30 mg)	60
March 11, 2014	oxycodone (15 mg)	60
March 25, 2014	oxycodone (30 mg)	120
April 9, 2014	oxycodone (15 mg)	60
May 7, 2014	oxycodone (30 mg) oxycodone (15 mg)	120 60

13. On or about May 14, 2014, defendant JENNIFER LYNN CHAMBERS, with the assistance of defendant JOSEPH MEHL, attempted to obtain prescriptions for controlled substances from defendant WILLIAM J. O'BRIEN III. Defendant CHAMBERS told defendant PATRICK TREACY that she would sell the prescriptions to raise money for him.

14. On or about May 8, 2014, defendant PATRICK TREACY was incarcerated in Philadelphia. While defendant TREACY was in prison, defendant JENNIFER LYNN CHAMBERS was ostracized by the Pagans. As a result, on or about May 21, 2014, at the direction of defendant MICHAEL THOMPSON, defendant WILLIAM J. O'BRIEN III "discharged" defendant CHAMBERS from his practice. Defendant TREACY told defendant CHAMBERS that she had been ostracized because defendant CHAMBERS was using heroin. Defendant TREACY explained, "I'm part of an organized crime family . . . they won't let me be with you if you are using!"

All in violation of Title 21, United States Code, Section 846.

COUNTS THREE THROUGH ONE HUNDRED SIXTEEN

(Distribution of Schedule II Controlled Substances)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 25 of Count One, and Paragraphs 2 through 10 and 12 through 31 of Count Two are incorporated here.

2. On or about each of the dates listed below in the Eastern District of Pennsylvania, defendant

WILLIAM J. O'BRIEN III

knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and for no legitimate medical purpose, a mixture and substance containing a detectable amount of the Schedule II controlled substance listed (each distribution constituting a separate count of this indictment):

COUNT	PERSON	APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
3	Person #1	April 3, 2014	oxycodone (20 mg)	60
4	Person #1	April 24, 2014	oxycodone (20 mg)	60
5	Person #1	May 15, 2014	oxycodone (20 mg)	90
6	Person #1	June 2, 2014	oxycodone (20 mg)	90
7	Person #1	June 19, 2014	oxycodone (20 mg)	90
8	Person #1	July 10, 2014	oxycodone (20 mg)	120
9	Person #1	August 7, 2014	oxycodone (30 mg)	90
10	Person #1	August 28, 2014	oxycodone (30 mg)	120
11	Person #1	September 18, 2014	oxycodone (30 mg)	120
12	Person #1	October 9, 2014	oxycodone (30 mg)	120
13	Person #1	October 30, 2014	oxycodone (30 mg)	120
14	Person #1	November 20, 2014	oxycodone (30 mg)	120
COUNT	PERSON	APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY

15	Person #1	December 15, 2014	oxycodone (30 mg)	120
16	Person #2	August 7, 2014	oxycodone (30 mg)	120
17	Person #2	September 4, 2014	oxycodone (30 mg)	120
18	Person #2	October 2, 2014	oxycodone (30 mg)	180
19	Person #2	October 30, 2014	oxycodone (30 mg)	180
20	Person #2	November 24, 2014	oxycodone (30 mg)	180
21	Person #3	September 10, 2012	oxycodone (30 mg)	120
22	Person #3	September 24, 2012	oxycodone (30 mg)	120
23	Person #3	January 5, 2013	oxycodone (30 mg)	120
24	Person #3	April 9, 2013	oxycodone (30 mg)	240
25	Person #4	October 17, 2012	oxycodone (30mg)	240
26	Person #4	March 19, 2013	oxycodone (30 mg)	120
27	Person #4	July 15, 2013	oxycodone (30 mg)	240
28	Person #5	April 22, 2014	oxycodone (30 mg)	120
29	Person #6	January 13, 2015	oxycodone (30 mg)	120
30	Person #7	November 5, 2014	oxycodone (30 mg)	120
31	Person #7	November 19, 2014	oxycodone (30 mg)	120
32	Person #7	December 3, 2014	oxycodone (30 mg)	120
33	Person #8	December 3, 2014	oxycodone (30 mg)	120
34	Person #8	December 17, 2014	oxycodone (30 mg)	240
35	Person #8	January 7, 2015	oxycodone (30 mg)	120
36	Person #8	January 21, 2015	oxycodone (30 mg)	120
37	Person #9	September 4, 2014	oxycodone (30 mg)	120
38	Person #9	September 4, 2014	amphetamine (30 mg)	90
39	Person #9	September 4, 2014	methadone (10 mg)	150

COUNT	PERSON	APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
40	Person #9	September 4, 2014	methadone (10 mg)	30
41	C. Johnson	February 18, 2014	oxycodone (30 mg)	120
42	C. Johnson	March 11, 2014	oxycodone (30 mg)	120
43	C. Johnson	July 15, 2014	methadone (10 mg)	120
44	C. Johnson	July 15, 2014	oxycodone (30 mg)	120
45	Person #10	March 17, 2014	oxycodone (30 mg)	240
46	Person #10	April 14, 2014	oxycodone (30 mg)	240
47	Person #10	May 15, 2014	methadone (10 mg)	180
48	Person #10	August 28, 2014	oxycodone (30 mg)	240
49	Person #10	December 18, 2014	oxycodone (30 mg)	240
50	Person #10	January 12, 2015	methadone (10 mg)	180
51	Person #10	January 12, 2015	oxycodone (30 mg)	240
52	Person #11	May 8, 2013	oxycodone (30 mg)	120
53	Person #11	May 8, 2013	amphetamine (20 mg)	90
54	Person #12	August 27, 2014	oxycodone (30 mg)	120
55	Person #12	September 23, 2014	oxycodone (30 mg)	120
56	A. Rongione	February 4, 2014	oxycodone (30 mg)	120
57	A. Rongione	July 8, 2014	oxycodone (30 mg)	240
58	A. Rongione	August 27, 2014	oxycodone (30 mg)	240
59	A. Rongione	November 24, 2014	oxycodone (30 mg)	240
60	J. Mehl	September 26, 2012	oxycodone (30 mg)	180
61	J. Mehl	October 1, 2012	oxycodone (30 mg)	120
62	J. Mehl	October 15, 2012	oxycodone (30 mg)	120
63	F. Corazo Jr.	January 30, 2013	oxycodone (30 mg)	120
64	F. Corazo Jr.	May 13, 2013	oxycodone (30 mg)	240
65	F. Corazo Jr.	August 4, 2014	methadone (10 mg)	600
66	F. Corazo Jr.	August 25, 2014	methadone (10 mg)	600
COUNT	PERSON	APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY

67	M. Thompson	December 26, 2012	oxycodone (30 mg)	120
68	M. Thompson	May 13, 2013	oxycodone (30 mg)	360
69	P. Treacy	September 19, 2012	oxycodone (30 mg)	120
70	P. Treacy	October 3, 2012	oxycodone (30 mg)	120
71	P. Treacy	December 11, 2012	oxycodone (30 mg)	240
72	P. Treacy	August 13, 2013	oxycodone (30 mg)	120
73	P. Treacy	May 6, 2014	oxycodone (30 mg)	120
74	P. Treacy	May 6, 2014	oxycodone (15 mg)	120
75	P. Treacy	November 11, 2014	oxycodone (30 mg)	120
76	P. Treacy	November 11, 2014	oxycodone (15 mg)	120
77	P. Treacy	December 16, 2014	oxycodone (30 mg)	120
78	P. Treacy	December 16, 2014	oxycodone (15 mg)	120
79	P. Treacy	January 7, 2015	oxycodone (30 mg)	120
80	J. Chambers	March 25, 2014	oxycodone (30 mg)	120
81	J. Chambers	May 7, 2014	oxycodone (30 mg)	120
82	J. Mitchell Sr.	April 12, 2013	oxycodone (30 mg)	120
83	J. Mitchell Sr.	April 24, 2013	oxycodone (30 mg)	120
84	J. Mitchell Sr.	October 1, 2013	oxycodone (30 mg)	120
85	J. Mitchell Sr.	October 14, 2013	oxycodone (30 mg)	120
86	J. Mitchell Sr.	February 25, 2014	oxycodone (30 mg)	120
87	J. Mitchell Sr.	April 9, 2014	oxycodone (30 mg)	120
88	J. Mitchell Sr.	April 30, 2014	oxycodone (30 mg)	120
89	Person #13	October 14, 2013	oxycodone (30 mg)	120
90	Person #13	October 1, 2013	oxycodone (30 mg)	120
91	S.N.	July 29, 2012	oxycodone (30 mg)	120
92	S.N.	August 6, 2012	oxycodone (30 mg)	120

COUNT	PERSON	APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
93	S.N.	September 5, 2013	oxycodone (30 mg)	120
94	Person #14	September 24, 2012	oxycodone (30 mg)	120
95	Person #14	November 5, 2012	oxycodone (30 mg)	120
96	Person #14	January 15, 2013	oxycodone (30 mg)	240
97	Person #15	September 5, 2013	oxycodone (30 mg)	240
98	Person #15	October 2, 2013	oxycodone (30 mg)	240
99	Person #15	August 4, 2014	oxycodone (30 mg)	120
100	P. Marrandino	August 14, 2012	oxycodone (30 mg)	120
101	P. Marrandino	November 13, 2013	oxycodone (30 mg)	120
102	P. Marrandino	December 19, 2013	oxycodone (30 mg)	120
103	P. Marrandino	January 26, 2014	oxycodone (30 mg)	120
104	Person #16	August 1, 2013	oxycodone (30 mg)	120
105	Person #16	August 26, 2013	oxycodone (30 mg)	120
106	Person #17	December 23, 2013	oxycodone (30 mg)	120
107	Person #17	December 11, 2014	oxycodone (30 mg)	240
108	Person #18	October 1, 2014	oxycodone (30 mg)	120
109	Person #18	October 22, 2014	oxycodone (30 mg)	120
110	Person #19	November 13, 2013	oxycodone (30 mg)	120
111	Person #19	December 19, 2013	oxycodone (30 mg)	120
112	Person #20	October 21, 2014	oxycodone (30 mg)	120
113	Person #20	November 4, 2014	oxycodone (30 mg)	120
114	Person #20	December 16, 2014	oxycodone (30 mg)	240
115	Person #21	December 17, 2013	oxycodone (30 mg)	120
116	Person #21	December 17, 2013	methadone (10 mg)	60

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNTS ONE HUNDRED SEVENTEEN
THROUGH ONE HUNDRED TWENTY-THREE**
(Distribution of Schedule IV Controlled Substances)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 25 of Count One are incorporated here.

2. On or about each of the dates listed below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

WILLIAM J. O'BRIEN III

knowingly and intentionally distributed and dispensed, outside the usual course of professional practice and for no legitimate medical purpose, a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance (each distribution constituting a separate count of this indictment):

COUNT	PERSON	APPROXIMATE DATE OF PRESCRIPTION	DRUG	QUANTITY
117	Person #1	May 15, 2014	Xanax (1 mg)	40
118	Person #1	June 2, 2014	Xanax (1 mg)	60
119	Person #1	November 20, 2014	Xanax (1 mg)	60
120	Person #2	September 4, 2014	Xanax (.5 mg)	60
121	Person #2	October 2, 2014	Xanax (.5 mg)	60
122	Person #2	October 30, 2014	Xanax (.5 mg)	60
123	Person #2	November 24, 2014	Xanax (1 mg)	60

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT ONE HUNDRED TWENTY-FOUR
(Distribution of Controlled Substances Resulting in Death)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 25 of Count One, and Paragraphs 2 through 10 and 12 through 31 of Count Two are incorporated here.

2. In addition to medically unnecessary controlled substances, defendant WILLIAM J. O'BRIEN III prescribed other drugs for "patients" to create the appearance that he was operating a legitimate medical practice. Among other drugs, defendant O'BRIEN prescribed cyclobenzaprine, a muscle relaxant also known as Flexeril®.

3. On or about December 17, 2013, in Levittown, in the Eastern District of Pennsylvania, defendant

WILLIAM J. O'BRIEN III

knowingly and intentionally distributed and dispensed, and aided and abetted the distribution and dispensing of, outside the usual course of professional practice and not for a legitimate medical purpose, approximately 120 pills each containing 30 milligrams of oxycodone, each pill of which is a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance; and approximately 60 pills each containing 10 milligrams of methadone, each pill of which is a mixture and substance containing a detectable amount of methadone, a Schedule II controlled substance to Person #21, a person known to the grand jury, and the death of Person #21 resulted from the combined use of these substances, with cyclobenzaprine. Defendant O'BRIEN prescribed for Person #21, 540 pills of cyclobenzaprine each containing 10 milligrams.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED TWENTY-FIVE
THROUGH ONE HUNDRED THIRTY
(Health Care Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 16 and 18 through 25 of Count One, and Paragraphs 2 through 10 and 12 through 31 of Count Two are incorporated here.

2. Keystone First was a “health care benefit program,” within the meaning of Title 18, United States Code, Section 24(b). Keystone First provided health insurance coverage for Pennsylvanians who were eligible to receive medical assistance, commonly known as Medicaid.

3. Defendant MICHAEL THOMPSON was a Medicaid beneficiary. As a Medicaid beneficiary defendant THOMPSON received prescription drug benefits through Keystone First.

4. Keystone First would pay for prescription drugs for defendant MICHAEL THOMPSON prescribed by a licensed physician within the usual course of professional practice and for a legitimate medical purpose. Upon his enrollment with Keystone First, defendant THOMPSON agreed to abide by Keystone First’s rules and regulations.

THE SCHEME TO DEFRAUD

5. Defendant MICHAEL THOMPSON used Keystone First benefits to pay for medically unnecessary prescriptions for oxycodone (30 mg) pills that defendant THOMPSON obtained from William J. O’Brien III for the purpose of resale. Defendant

THOMPSON falsely represented to Keystone First that the prescriptions were medically necessary.

6. Defendant MICHAEL THOMPSON obtained oxycodone (30 mg) pills at little or no cost to him using his Keystone First benefits. Defendant THOMPSON then sold the pills to drug dealers.

7. From in or around August 2012 through in or around August 2013, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MICHAEL THOMPSON,
a/k/a “Mikey,”
a/k/a “Tomato Pie,”**

knowingly and willfully executed, and aided and abetted, a scheme and artifice to defraud a health care benefit program, that is Keystone First, in connection with the delivery of or payment for health care benefits, items, or services, by means of false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of Keystone First, by causing fraudulent health care insurance claims for medically unnecessary prescription drugs to be submitted in the amounts listed below (each claim constituting a separate count of this indictment):

COUNT	DRUG	APPROXIMATE DATE OF CLAIM	APPROXIMATE AMOUNT OF CLAIM
125	oxycodone (30 mg)	August 13, 2012	\$ 175.58
126	oxycodone (30 mg)	September 4, 2012	\$ 175.58
127	oxycodone (30 mg)	January 30, 2013	\$ 177.28
128	oxycodone (30 mg)	February 26, 2013	\$ 175.58
129	oxycodone (30 mg)	July 10, 2013	\$ 199.99
130	oxycodone (30 mg)	August 2, 2013	\$ 199.99

In violation of Title 18, United States Code, Section 1347.

COUNT ONE HUNDRED THIRTY-ONE
THROUGH ONE HUNDRED THIRTY-FIVE
(Health Care Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 16 and 18 through 25 of Count One, and Paragraphs 2 through 10 and 12 through 31 of Count Two are incorporated here.

2. Keystone First was a “health care benefit program,” within the meaning of Title 18, United States Code, Section 24(b). Keystone First provided health insurance coverage for Pennsylvanians who were eligible to receive medical assistance, commonly known as Medicaid.

3. Defendant FRANK CORAZO, JR. was a Medicaid beneficiary. As a Medicaid beneficiary defendant CORAZO received prescription drug benefits through Keystone First.

4. Keystone First would pay for prescription drugs for defendant FRANK CORAZO, JR. prescribed by a licensed physician within the usual course of professional practice and for a legitimate medical purpose. Upon his enrollment with Keystone First, defendant CORAZO agreed to abide by Keystone First’s rules and regulations.

THE SCHEME TO DEFRAUD

5. Defendant FRANK CORAZO, JR. used Keystone First benefits to pay for medically unnecessary prescriptions for oxycodone (30 mg) pills that defendant CORAZO obtained from William J. O’Brien III for the purpose of resale. Defendant CORAZO falsely represented to Keystone First that the prescriptions were medically necessary.

6. Defendant FRANK CORAZO, JR. obtained oxycodone (30 mg) pills at little or no cost to him using his Keystone First benefits. Defendant CORAZO then sold the pills to drug dealers.

7. From in or around August 2012 through in or around June 2013, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FRANK CORAZO, JR.,
a/k/a “Stalker,”**

knowingly and willfully executed, and aided and abetted, a scheme and artifice to defraud a health care benefit program, that is Keystone First, in connection with the delivery of or payment for health care benefits, items, or services, by means of false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of Keystone First, by causing fraudulent health care insurance claims for medically unnecessary prescription drugs to be submitted in the amounts listed below (each claim constituting a separate count of this indictment):

COUNT	DRUG	APPROXIMATE DATE OF CLAIM	APPROXIMATE AMOUNT OF CLAIM
131	oxycodone (30 mg)	August 6, 2012	\$ 175.58
132	oxycodone (30 mg)	September 17, 2012	\$ 177.28
133	oxycodone (30 mg)	October 15, 2012	\$ 177.28
134	oxycodone (30 mg)	March 11, 2013	\$ 177.28
135	oxycodone (30 mg)	June 28, 2013	\$ 177.28

In violation of Title 18, United States Code, Section 1347.

COUNT ONE HUNDRED THIRTY-SIX
(Money Laundering Conspiracy)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 16 and 18 through 25 of Count One, and Paragraphs 2 through 10 and 12 through 31 of Count Two are incorporated here.

2. Defendant WILLIAM J. O'BRIEN III and defendant ELIZABETH HIBBS were married in or around January 2010. At that time defendant O'BRIEN owned WJO, Inc. ("WJO"), a group of medical practices. At various times, defendant HIBBS worked as the Chief Executive Officer of WJO and the Chief Operating Officer of WJO.

3. While working for WJO, defendant ELIZABETH HIBBS became aware that defendant WILLIAM J. O'BRIEN III had begun to prescribe excessive amounts of controlled substances, especially for members or associates of the Pagans, who caused disruptions at certain WJO offices. Because Pagan members and associates continued to cause disruption at certain WJO offices, members of the office staff expressed strong concerns about their personal safety to Physician #1, who was employed by WJO and whose identity is known to the grand jury.

4. In or around April 2012, Physician #1 confronted defendant WILLIAM J. O'BRIEN III about these concerns with defendant ELIZABETH HIBBS present. Defendant HIBBS continued to work for defendant O'BRIEN's medical practices after becoming aware of defendant O'BRIEN's criminal activities.

5. In or around July 2012, defendants WILLIAM J. O'BRIEN III and ELIZABETH HIBBS were terminated from WJO. Thereafter, defendant O'BRIEN operated a

solo practice as “Dr. Bill O’Brien, LLC.” Defendant HIBBS worked for his practice. In addition to periodically assisting defendant O’BRIEN with patients, and acting as the office manager, defendant HIBBS’s companies – Rapidly Recover DME and Dragonflies Health Care – were the primary suppliers of durable medical equipment and certain prescription drugs for defendant O’BRIEN’s patients. Defendant O’BRIEN prescribed this durable medical equipment and these prescriptions drugs for virtually every “accident patient” in his practice, and then submitted claims to the patient’s automobile insurance provider for Rapidly Recover DME and Dragonflies Health Care.

6. Defendant ELIZABETH HIBBS, through Rapidly Recover DME and Dragonflies Health Care, received payments by check from the patients’ insurance companies. Defendant HIBBS deposited these checks into bank accounts titled to Rapidly Recover DME and Dragonflies Health Care, for which she was the signatory. From in or around July 2012 through in or around January 2015, defendant HIBBS did not operate cash businesses.

7. In or around October 2012, defendant ELIZABETH HIBBS trained Angela Rongione, and former staff members Employees #1 and #2, whose identities are known to the grand jury, when defendant WILLIAM J. O’BRIEN III opened the Mega-Gym and Levittown offices. Defendant HIBBS would periodically work at the reception desk at Levittown and Bustleton. While working in these offices, defendant HIBBS, among other things, retrieved medical charts and escorted patients to examination rooms.

8. On or about October 15, 2012 defendant WILLIAM J. O’BRIEN III and defendant ELIZABETH HIBBS were officially divorced. The decree and order of divorce filed in the Court of Common Pleas for Philadelphia County cited “irretrievable breakdown” as the cause for the dissolution of the marriage. Notwithstanding an “irretrievable breakdown” in their

relationship, defendants O'BRIEN and HIBBS resided together, worked together, and by all outward appearances, appeared to continue to act as husband and wife.

9. In or around November 2014, defendant WILLIAM J. O'BRIEN III, at the urging of defendant ELIZABETH HIBBS, terminated Angela Rongione's employment. Following Rongione's departure, defendant HIBBS worked at Levittown and Bustleton on a regular basis. Defendant HIBBS was in a position to observe the "patients" for whom defendant O'BRIEN was prescribing controlled substances, and the large quantities of controlled substances that defendant O'BRIEN routinely prescribed for those "patients." Defendant HIBBS was licensed as a Physician Assistant in Pennsylvania. As a trained and experienced Physician Assistant, defendant HIBBS was knowledgeable about the customary safeguards and regulations attendant to prescribing controlled substances, and the circumstances indicating that most, if not all, of the controlled substance prescriptions that defendant O'BRIEN was writing were not for a legitimate medical purpose.

THE CONSPIRACY

10. From in or about July 2012 through in or about January 2015, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendants

**WLLIAM J. O'BRIEN III and
ELIZABETH HIBBS,
a/k/a "Elizabeth O'Brien,"**

conspired and agreed together to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and the defendants acted with knowledge that the

transaction was designed in whole or part to conceal and disguise the nature, source, ownership, and control of the proceeds of specified unlawful activity.

MANNER AND MEANS

It was part of the conspiracy that:

11. Defendant WILLIAM J. O'BRIEN III sold prescriptions for dangerous and addictive controlled substances without a legitimate medical purpose in exchange for cash. Defendant O'BRIEN required that "patients" pay him a cash fee of \$200 before he would see them. Angela Rongione, charged elsewhere, and others at her direction, placed the daily cash collections in an envelope for defendant O'BRIEN. Angela Rongione, and others at her direction, placed a receipt, known as a "cash slip," in the medical chart to show defendant O'BRIEN that the "patient" had paid the \$200 cash as required. Before providing the "patient" with prescriptions for controlled substances, defendant O'BRIEN checked the chart for the "cash slip." At the end of each business day, defendant O'BRIEN reconciled the "cash slips" to the total amount of cash inside the envelope.

12. Defendant WILLIAM J. O'BRIEN III generated at least approximately \$20,000 per week in illegal cash proceeds. Defendant O'BRIEN did not record the cash receipts in the business accounts titled to "Dr. Bill O'Brien LLC," including those accounts held at TD Bank ending in #7274; #0050; and #5378.

13. Defendant WILLIAM J. O'BRIEN III directed Employee #2 to shred the "cash slips" at the end of each business day. After he completed his reconciliation of cash receipts, defendant O'BRIEN would place a note on the pile of "cash slips" indicating that the documents were ready for shredding.

14. Defendant WILLIAM J. O'BRIEN III took all of the cash collected in the office. Defendant O'BRIEN carried the cash outside from the office in his briefcase. Defendant O'BRIEN transported thousands of dollars in cash from his office to the residence that he shared with defendant ELIZABETH HIBBS.

15. Defendant ELIZABETH HIBBS deposited the illicit cash proceeds into various bank accounts, at different banks, and into safety deposit boxes titled in her name or held jointly with one of her daughters. This elaborate mechanism concealed the fact that the source of the cash was defendant WILLIAM J. O'BRIEN III's illegal drug distribution operation.

16. Defendant ELIZABETH HIBBS concealed the illicit proceeds generated by defendant WILLIAM J. O'BRIEN III in five accounts, held at three separate banks, including TD Bank account ending in #2312; Wells Fargo Bank account ending in #1846; Wells Fargo Bank account ending in #2086; Wells Fargo Bank account ending in #5603; and National Penn Bank account ending in #8960.

17. From in or around July 9, 2013 through in or around December 9, 2014, defendant ELIZABETH HIBBS routinely made cash deposits into TD Bank account ending in #2312 for a total of approximately \$56,710 over this period. Defendant HIBBS typically deposited cash in this account, which was titled to her, on a bi-weekly basis.

18. From in or around July 2012 through in or around December 1, 2014, defendant ELIZABETH HIBBS deposited approximately \$94,100 in cash into Wells Fargo Bank account ending in #1846, a checking account titled to defendant HIBBS.

19. From in or around February 2013 through in or around December 1, 2014, defendant ELIZABETH HIBBS deposited approximately \$43,000 in cash into Wells Fargo Bank account ending in #2086, a checking account titled to defendant HIBBS and her

daughter Julianne.

20. From in or around June 2013 through in or around December 23, 2014 defendant ELIZABETH HIBBS deposited approximately \$21,000 in cash into Wells Fargo Bank account ending in #5603, a checking account titled to defendant HIBBS.

21. From in or around August 13, 2013 through in or around September 14, 2014, defendant ELIZABETH HIBBS deposited approximately \$17,000 in cash into National Penn Bank account ending in #8960, a checking account titled to defendant HIBBS and her daughter Patricia.

22. From in or around August 1, 2014 through in or around November 12, 2014 defendant ELIZABETH HIBBS deposited approximately \$6,600 in cash into National Penn Bank account ending in #6054, a checking account titled to defendant HIBBS.

23. In furtherance of the conspiracy, defendants ELIZABETH HIBBS and WILLIAM J. O'BRIEN III concealed proceeds from defendant O'BRIEN's drug dealing operation in bank safety deposit boxes.

24. On or about January 28, 2013, defendant ELIZABETH HIBBS opened safety deposit box #422 at a TD Bank branch in Newtown, PA to conceal criminally derived proceeds. Safety deposit box #422 was titled to defendant HIBBS and her daughter Patricia, but only defendant HIBBS accessed the box.

25. On or about November 11, 2014, defendant ELIZABETH HIBBS opened safety deposit box # 1677 at a TD Bank branch located in Philadelphia, PA. Safety deposit box #1677 was titled to defendant HIBBS. After she opened safety deposit box #1677, defendant HIBBS did not access it again until its contents, including approximately \$58,800 in cash, were seized by federal agents on or about January 29, 2015.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants WILLIAM J. O'BRIEN III and ELIZABETH HIBBS committed the following overt acts, among others, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere:

1. On or about January 28, 2015, defendant WILLIAM J. O'BRIEN III stored approximately \$10,290 in cash, representing proceeds of drug dealing activities, in the residence he shared with defendant ELIZABETH HIBBS in Philadelphia PA.

2. On or about the dates listed below, each date constituting a separate overt act, defendant ELIZABETH HIBBS deposited cash, obtained from defendant WILLIAM J. O'BRIEN III, into bank accounts titled to her, in order to conceal the illegal source of the proceeds:

APPROXIMATE DATE	FINANCIAL INSTITUTION	ACCOUNT ENDING in #	AMOUNT of CASH DEPOSITED
July 18, 2012	Wells Fargo	1846	\$ 800.00
July 24, 2012	Wells Fargo	1846	\$4,000.00
August 8, 2012	Wells Fargo	1846	\$2,500.00
August 15, 2012	Wells Fargo	1846	\$6,000.00
August 24, 2012	Wells Fargo	1846	\$3,000.00
September 13, 2012	Wells Fargo	1846	\$1,800.00
September 17, 2012	Wells Fargo	1846	\$ 500.00
September 24, 2012	Wells Fargo	1846	\$ 3,800.00
October 4, 2012	Wells Fargo	1846	\$1,000.00
October 10, 2012	Wells Fargo	1846	\$ 900.00
October 22, 2012	Wells Fargo	1846	\$3,300.00
November 1, 2012	Wells Fargo	1846	\$2,000.00

APPROXIMATE DATE	FINANCIAL INSTITUTION	ACCOUNT ENDING in #	AMOUNT of CASH DEPOSITED
November 8, 2012	Wells Fargo	1846	\$2,000.00
November 14, 2012	Wells Fargo	1846	\$1,000.00
November 20, 2012	Wells Fargo	1846	\$2,500.00
December 26, 2012	Wells Fargo	1846	\$1,900.00
January 28, 2013	Wells Fargo	1846	\$2,000.00
February 6, 2013	Wells Fargo	2086	\$1,600.00
February 19, 2013	Wells Fargo	1846	\$1,000.00
February 19, 2013	Wells Fargo	2086	\$3,000.00
February 21, 2013	Wells Fargo	1846	\$6,000.00
March 11, 2013	Wells Fargo	1846	\$1,100.00
March 15, 2013	Wells Fargo	1846	\$3,000.00
March 27, 2013	Wells Fargo	1846	\$2,000.00
April 11, 2013	Wells Fargo	2086	\$1,000.00
May 2, 2013	Wells Fargo	2086	\$2,500.00
May 8, 2013	Wells Fargo	1846	\$2,000.00
June 13, 2013	Wells Fargo	1846	\$1,500.00
June 13, 2013	Wells Fargo	5603	\$ 470.00
July 29, 2013	TD Bank	2312	\$1,980.00
August 6, 2013	TD Bank	2312	\$1,200.00
August 14, 2013	TD Bank	2312	\$2,000.00
August 19, 2013	National Penn	8960	\$4,500.00
September 4, 2013	TD Bank	2312	\$1,000.00
September 5, 2013	Wells Fargo	2086	\$2,000.00
September 20, 2013	TD Bank	2312	\$ 940.00
October 2, 2013	Wells Fargo	2086	\$2,000.00
October 7, 2013	TD Bank	2312	\$2,000.00
October 9, 2013	TD Bank	2312	\$3,000.00

APPROXIMATE DATE	FINANCIAL INSTITUTION	ACCOUNT ENDING in #	AMOUNT of CASH DEPOSITED
October 15, 2013	Wells Fargo	1846	\$2,000.00
October 18, 2013	Wells Fargo	1846	\$1,000.00
October 22, 2013	TD Bank	2312	\$3,000.00
October 23, 2013	Wells Fargo	1846	\$3,000.00
October 30, 2013	Wells Fargo	1846	\$1,500.00
October 30, 2013	Wells Fargo	2086	\$2,000.00
October 30, 2013	TD Bank	2312	\$1,500.00
November 6, 2013	Wells Fargo	1846	\$1,000.00
November 6, 2013	Wells Fargo	5603	\$3,000.00
November 6, 2013	TD Bank	2312	\$1,900.00
November 12, 2013	National Penn	8960	\$3,250.00
November 12, 2013	TD Bank	2312	\$1,750.00
November 18, 2013	TD Bank	2312	\$ 700.00
November 22, 2013	Wells Fargo	1846	\$1,500.00
November 27, 2013	Wells Fargo	1846	\$2,200.00
November 27, 2013	TD Bank	2312	\$2,700.00
December 4, 2013	Wells Fargo	2086	\$2,000.00
December 17, 2013	TD Bank	2312	\$3,000.00
December 23, 2013	Wells Fargo	1846	\$1,000.00
December 26, 2013	Wells Fargo	1846	\$1,000.00
December 26, 2013	Wells Fargo	2086	\$2,000.00
December 26, 2013	TD Bank	2312	\$2,500.00
January 13, 2014	Wells Fargo	1846	\$1,400.00
January 13, 2014	National Penn	8960	\$2,000.00
January 13, 2014	TD Bank	2312	\$3,500.00
January 15, 2014	Wells Fargo	1846	\$1,000.00
January 21, 2014	TD Bank	2312	\$ 300.00

APPROXIMATE DATE	FINANCIAL INSTITUTION	ACCOUNT ENDING in #	AMOUNT of CASH DEPOSITED
January 23, 2014	TD Bank	2312	\$1,980.00
January 31, 2014	Wells Fargo	1846	\$2,000.00
January 31, 2014	Wells Fargo	2086	\$2,500.00
February 6, 2014	Wells Fargo	5603	\$2,000.00
February 7, 2014	Wells Fargo	1846	\$1,000.00
February 21, 2014	Wells Fargo	1846	\$2,000.00
February 27, 2014	TD Bank	2312	\$1,000.00
March 4, 2014	Wells Fargo	5603	\$ 500.00
March 10, 2014	Wells Fargo	2086	\$2,500.00
March 19, 2014	Wells Fargo	1846	\$ 500.00
March 27, 2014	Wells Fargo	2086	\$1,500.00
March 28, 2014	Wells Fargo	2086	\$6,000.00
April 7, 2014	Wells Fargo	2086	\$2,500.00
April 7, 2014	Wells Fargo	5603	\$ 200.00
April 10, 2014	TD Bank	2312	\$1,000.00
April 16, 2014	Wells Fargo	5603	\$1,000.00
April 24, 2014	Wells Fargo	1846	\$1,500.00
May 12, 2014	Wells Fargo	2086	\$2,500.00
May 12, 2014	TD Bank	2312	\$4,000.00
May 15, 2014	Wells Fargo	1846	\$2,000.00
May 15, 2014	TD Bank	2312	\$2,000.00
June 3, 2014	TD Bank	2312	\$1,500.00
June 3, 2014	Wells Fargo	1846	\$ 500.00
June 3, 2014	Wells Fargo	2086	\$2,500.00
June 3, 2014	Wells Fargo	5603	\$9,000.00
June 3, 2014	National Penn	8960	\$3,500.00
July 9, 2014	Wells Fargo	2086	\$1,100.00

APPROXIMATE DATE	FINANCIAL INSTITUTION	ACCOUNT ENDING in #	AMOUNT of CASH DEPOSITED
July 17, 2014	Wells Fargo	1846	\$3,000.00
July 21, 2014	TD Bank	2312	\$ 700.00
July 28, 2014	TD Bank	2312	\$3,000.00
July 29, 2014	Wells Fargo	1846	\$ 180.00
August 6, 2014	TD Bank	2312	\$1,180.00
August 6, 2014	Wells Fargo	2086	\$1,100.00
August 6, 2014	National Penn	6054	\$3,000.00
August 8, 2014	Wells Fargo	1846	\$ 120.00
August 21, 2014	Wells Fargo	1846	\$ 800.00
August 21, 2014	Wells Fargo	2086	\$1,100.00
August 21, 2014	TD Bank	2312	\$ 600.00
August 28, 2014	Wells Fargo	1846	\$ 900.00
August 28, 2014	TD Bank	2312	\$1,080.00
September 3, 2014	TD Bank	2312	\$ 500.00
September 10, 2014	National Penn	8960	\$4,000.00
September 10, 2014	National Penn	6054	\$2,000.00
September 25, 2014	Wells Fargo	1846	\$ 730.00
October 6, 2014	Wells Fargo	2086	\$1,000.00
October 8, 2014	Wells Fargo	1846	\$ 750.00
October 10, 2014	TD Bank	2312	\$ 300.00
October 15, 2014	TD Bank	2312	\$3,000.00
October 21, 2014	Wells Fargo	1846	\$1,000.00
October 21, 2014	TD Bank	2312	\$ 400.00
October 28, 2014	TD Bank	2312	\$ 400.00
October 29, 2014	Wells Fargo	1846	\$ 300.00
November 4, 2014	TD Bank	2312	\$1,100.00
November 12, 2014	National Penn	6054	\$1,600.00

APPROXIMATE DATE	FINANCIAL INSTITUTION	ACCOUNT ENDING in #	AMOUNT of CASH DEPOSITED
November 19, 2014	Wells Fargo	1846	\$3,780.00
December 1, 2014	Wells Fargo	1846	\$ 700.00
December 1, 2014	Wells Fargo	2086	\$1,100.00
December 15, 2014	Wells Fargo	1846	\$ 200.00
December 23, 2014	Wells Fargo	5603	\$5,000.00

3. On or about November 11, 2014, defendant ELIZABETH HIBBS concealed approximately \$58,800 in cash, which represented proceeds from defendant WILLIAM J. O'BRIEN III's drug dealing operation, in TD Bank safety deposit box #1677 located in Philadelphia PA.

4. From on or about January 28, 2013 to on or about October 21, 2014, defendant ELIZABETH HIBBS concealed approximately \$58,050 in cash, which represented proceeds from defendant WILLIAM J. O'BRIEN III's drug dealing operation, in TD Bank safety deposit box #422 located in Newtown, PA.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT ONE HUNDRED THIRTY-SEVEN
(Conspiracy to Commit Bankruptcy Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 25 of Count One, and Paragraphs 2 through 10 and 12 through 31 of Count Two, are incorporated here.

Bankruptcy Background

At all times material to this indictment:

2. A voluntary bankruptcy was initiated by the filing of a bankruptcy petition (the “petition”) in the Bankruptcy Court. The person or corporation filing the petition was a “debtor” under federal bankruptcy law. The bankruptcy process was governed by the United States Bankruptcy Code (the “Bankruptcy Code”).

3. Upon the filing of a bankruptcy petition, full financial disclosure was required. The financial disclosure requirements were the same for individual debtors and corporate debtors. The debtor was required to fully disclose all financial circumstances, including, among other things, assets, liabilities, income from prior years, and any anticipated income. Assets included real, personal, tangible and intangible property, whether or not the asset was held in the debtor’s name or held in the name of another person or entity on behalf of the debtor.

4. A bankruptcy “estate” was created upon the filing of a bankruptcy petition, which was a collective reference to all legal or equitable interests of the debtor in property at the time of the bankruptcy filing. The estate included all property in which the debtor had an interest, even if it were owned or held by another person.

5. Chapter 11 of the Bankruptcy Code allowed a debtor to preserve, protect, and reorganize a financially ailing business. Reorganization under Chapter 11 allowed the debtor to attempt to restructure pre-filing debts, allows the entity to continue in operation, and offered the debtor an opportunity to repay some debts and discharge the remainder.

6. Reorganization under Chapter 11 afforded a debtor the chance to remain in possession of its property and control the business operation. The debtor was therefore known as the “Debtor In Possession” (the “DIP”).

7. The DIP was required to fulfill certain statutory duties of a trustee as specified in Title 11, United States Code, Section 704. These duties included, among others, collecting and preserving the estate for the benefit of its creditors. All property that the debtor obtained both before and after the filing of the petition, but before discharge by the bankruptcy court, was property of the estate. The DIP was required to segregate property of the estate by closing all pre-petition bank accounts, and conducting business transaction through new accounts titled as DIP. All of the debtor’s receipts were required to be deposited into the DIP accounts and all expenditures made from those same accounts.

8. The DIP was required to provide detailed accounting statements of its operations which were filed with the Bankruptcy Court. The accounting statements, known as monthly operating reports (“MOR”), were required to include all of the receipts and expenditures of the DIP. The MOR was used to gauge the ability of the debtor to fund the Chapter 11 reorganization plan to provide payment to the creditors, with the ultimate goal of discharging the bankruptcy petition.

9. In certain circumstances, such as where fraud, dishonesty, incompetence, or gross mismanagement was suspected, a Chapter 11 Trustee would be appointed. Rule 2004 of

the Federal Rules of Bankruptcy Procedure required that the debtor, and other witnesses, be placed under oath when questioned by the Trustee, or the Trustee's representative, about the DIP's financial affairs.

10. Defendant WILLIAM J. O'BRIEN III was president and owner of WJO. From in or around November 2010 to in or around July 2012, defendant O'BRIEN and his then-wife, defendant ELIZABETH HIBBS, were employees of WJO. Defendant HIBBS was WJO's chief operating officer, and during that same period defendants O'BRIEN and HIBBS, at various times, held the position of chief executive officer of WJO. Defendant O'BRIEN was the sole shareholder of WJO.

11. On or about November 15, 2010, defendant WILLIAM J. O'BRIEN III voluntarily filed, or caused to be filed, in the United States Bankruptcy Court for the Eastern District of Pennsylvania, a bankruptcy petition for WJO under Chapter 11 of the Bankruptcy Code. The matter was captioned In re WJO, Inc. and was assigned case number 10-19894. The case remained open at all times relevant to this indictment.

12. Prior to November 1, 2010, defendant WILLIAM J. O'BRIEN III had consolidated other businesses which he owned, including HyperOx I LP, HyperOx III LP and East Coast TMR Inc., into WJO.

13. After filing the petition for WJO, as a DIP, defendant WILLIAM J. O'BRIEN III opened new bank accounts for WJO - WJO DIP; and WJO DIP (Payroll). As a DIP, defendant O'BRIEN was required to use these accounts exclusively for WJO's receipts and disbursements. These requirements were reviewed with defendant O'BRIEN at the initial debtor interview on December 6, 2010.

14. As of November 15, 2010, the date on which the petition was filed, all of the assets of WJO, including its outstanding receivables, became part of the bankruptcy estate. Specifically, any and all outstanding receivables, although related to services rendered prior to filing for bankruptcy on November 15, 2010, became the legal property of the estate. On and after November 15, 2010, unless and until the petition was discharged, all billings, receipts, and payments for services rendered by WJO were the property of the estate.

15. As of November 15, 2010, WJO's accounts receivable were primarily comprised of payments due from medical insurance providers, and from attorneys based on indemnification agreements. An attorney representing a patient without medical insurance would indemnify defendant WILLIAM J. O'BRIEN III for the cost of the patient's medical treatment. The patient would not be charged at the time of service. Instead, defendant O'BRIEN would be paid by the patient's attorney later, with proceeds from the settlement of the patient's personal injury case.

16. In addition to its core medical practice, WJO provided contract billing and collection services to Philadelphia Family Medical Associates, Inc. ("PFMA"). PFMA was a separate and independent medical practice of Physician #2, whose identity is known to the grand jury. Physician #2 worked part-time for WJO, but also maintained a solo practice. Several years before the petition was filed, Physician #2 had contracted with WJO, on behalf of PFMA, for WJO to perform billing and collection services for PFMA. Employee #3, a WJO employee whose identity is known to the grand jury, would submit insurance claims for PFMA and collect its outstanding receivables. PFMA typically paid WJO approximately 50% of the total amount collected by Employee #3. PFMA typically paid WJO by check on a weekly basis. The checks from PFMA were made payable to defendant WILLIAM J. O'BRIEN III.

17. On or about July 3, 2012, an order was entered by the Bankruptcy Court directing the appointment of Alfred T. Guiliano, Esq. as the Chapter 11 Trustee for WJO. On or about July 10, 2012, acting in his capacity as the court-appointed Trustee, Mr. Guiliano terminated the employment of defendants WILLIAM J. O'BRIEN, III and ELIZABETH HIBBS with WJO.

18. Mr. Guiliano initiated an adversary proceeding (Adversary No. 13-372) against defendant WILLIAM J. O'BRIEN III seeking to recover monies that were allegedly taken from the estate by defendant O'BRIEN and converted to defendant O'BRIEN's personal use. Specifically, Person #22, whose identity is known to the grand jury, sought treatment from defendant O'BRIEN from approximately in or around October 20, 2008 through in or around April 28, 2010 for work-related injuries. Defendant O'BRIEN claimed that the cost of the medical services that he provided to Person #22 was approximately \$135,000. Liberty Mutual Insurance Company ("Liberty Mutual") provided workmans' compensation coverage for Person #22's employer. On November 15, 2010, when the petition was filed, the account receivable for services rendered to Person# 22, which defendant O'BRIEN claimed was \$135,000, became the property of the bankruptcy estate.

19. Leslie J. Jandoli, Esq. represented Person #22 in connection with workmans' compensation claims. In or around August 2012, after defendant WILLIAM J. O'BRIEN III was fired from WJO, Attorney Jandoli settled Person #22's claim with Liberty Mutual. As part of the settlement, Liberty Mutual offered to pay \$40,000 for medical services provided by defendant O'BRIEN to Person #22. Unaware that defendant O'BRIEN had been fired from WJO, Attorney Jandoli conveyed the offer to defendant O'BRIEN, who accepted it.

Defendant O'BRIEN instructed Attorney Jandoli that the settlement check should be made payable to him personally.

20. On or about September 12, 2012, defendant O'BRIEN deposited the \$40,000 check from Liberty Mutual into TD bank account ending in #7274 titled to "Dr. Bill O'Brien LLC" for which he was the authorized signer.

21. On or about November 29, 2012, Mr. Guiliano, in his capacity as the court-appointed Trustee for WJO, referred In re WJO, Inc., case 10-19894, to the United States Attorney for the Eastern District of Pennsylvania for investigation into allegations of bankruptcy fraud.

22. On or about April 28, 2014, the Bankruptcy Court entered an order in the adversary proceeding (Adversary No. 13-372) granting summary judgment in favor of the Trustee and against defendant WILLIAM J. O'BRIEN III. The Court determined that the \$40,000 payment from Liberty Mutual was the property of the bankruptcy estate. Accordingly, the Court entered a judgment against defendant O'BRIEN in the amount of \$40,000. When the Trustee attempted to collect the \$40,000 from defendant O'BRIEN, defendant O'BRIEN falsely claimed he did not have any money with which to pay the judgment.

THE CONSPIRACY

23. From at least in or about January 2011 to in or about January 2015, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendants

**WILLIAM J. O'BRIEN, III and
ELIZABETH HIBBS,
a/k/a "Elizabeth O'Brien,"**

conspired and agreed together to knowingly and fraudulently conceal, and caused to be concealed, from creditors and the United States Trustee, in connection with WJO bankruptcy

case number 10-19894, which is a case under Title 11 of the United States Code, property belonging to the bankruptcy estate, that is by diverting payments received after November 15, 2010, which were the property of the bankruptcy estate, into personal bank accounts and other non-DIP accounts, in violation of Title 18, United States Code, Section 152(1).

MANNER AND MEANS

It was part of the conspiracy that:

24. Defendant WILLIAM J. O'BRIEN III filed, and caused to be filed, false and fraudulent MOR statements, which he signed or caused to be signed as true and correct, under penalty of perjury, in which the defendants intentionally omitted monies received by WJO, and concealed other material facts, and provided false and misleading information.

25. WJO employees were instructed to separate any checks for payment on WJO's accounts receivable which listed defendant WILLIAM J. O'BRIEN III, not WJO, as the payee. Defendant O'BRIEN concealed these monies from the Trustee by omitting the payments from the MOR and then depositing the funds into non-WJO DIP accounts.

26. In or around January 2011, PFMA was notified that, going forward, remittance checks for WJO's billing and collection services should be made payable to "Elizabeth O'Brien" instead of "William J. O'Brien III" as had been the historical practice. However, the billing and collection services continued to be performed as before by Employee #3, who was a paid employee of WJO. Defendant HIBBS did not perform any of the billing or collection work, yet she collected checks from PFMA and deposited the monies into non-WJO DIP accounts. The business relationship between PFMA and WJO was concealed from the Trustee.

27. Defendants WILLIAM J. O'BRIEN III and ELIZABETH HIBBS

frustrated efforts by the Bankruptcy Court and the Trustee to identify and collect estate property by testifying falsely at hearings and depositions. For example, on or about June 13, 2012, defendant HIBBS testified falsely that she was performing the billing and collections for PFMA during her free time on weekends to justify the payments to her from PFMA instead of to WJO. On or about October 6, 2014, defendant O'BRIEN testified falsely at a deposition by the Trustee's representative that "he gets nothing" from his business when, at that time, he was generating significant cash proceeds from his drug trafficking operation. Also on or about October 6, 2014, defendant O'BRIEN further testified that he was living at his Levittown office, or sometimes with an unidentified cousin, because he was broke and homeless. At that time, defendant O'BRIEN had rented at a luxury condominium in Philadelphia, and resided in Beach Haven, New Jersey and other locations with defendant HIBBS. Contrary to his testimony, defendant O'BRIEN lived a lavish lifestyle that included Caribbean vacations, designer clothing, and fine dining.

28. Defendants WILLIAM J. O'BRIEN III and ELIZABETH HIBBS were

married on or about January 30, 2010. Defendant O'BRIEN and defendant HIBBS were officially divorced on or about October 15, 2012. The decree and order of divorce filed in the Court of Common Pleas for Philadelphia County cited "irretrievable breakdown" as the cause for the dissolution of the marriage. Notwithstanding an alleged "irretrievable breakdown" in their relationship, defendants O'BRIEN and HIBBS resided together, worked together, and by all outward appearances, appeared to continue to act as husband and wife.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants WILLIAM J. O'BRIEN III and ELIZABETH HIBBS committed the following overt acts, among others, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere:

1. On or about the dates listed below, each date constituting a separate overt act, defendant ELIZABETH HIBBS knowingly and fraudulently concealed and caused to be concealed from creditors and from the United States Bankruptcy Trustee the following payments from PFMA, which were property of the estate, by diverting the payments to Wachovia/Wells Fargo Bank account ending in #1846, which was titled to her:

DATE OF DEPOSIT	CHECK NO.	AMOUNT
February 11, 2011	9190	\$4,465.69
February 18, 2011	9194	\$6,688.63
February 18, 2011	9173	\$8,015.67
February 23, 2011	9209	\$2,697.41
March 8, 2011	9221	\$4,149.84
March 24, 2011	9236	\$2,547.14
March 24, 2011	9261	\$4,273.14
April 19, 2011	9289	\$5,077.09
April 19, 2011	9282	\$4,014.23
May 13, 2011	9346	\$5,000.00
May 13, 2011	9345	\$6,208.06
May 26, 2011	9356	\$6,822.41
May 26, 2011	9367	\$2,819.72
June 14, 2011	9378	\$3,313.55
June 14, 2011	9398	\$3,739.94
July 6, 2011	9437	\$2,592.73
July 11, 2011	9447	\$5,068.39
July 26, 2011	9473	\$2,866.58
August 5, 2011	9507	\$2,519.36
October 31, 2011	9664	\$1,696.96

2. On or about the dates listed below, each date constituting a separate overt act, defendant ELIZABETH HIBBS knowingly and fraudulently concealed, and caused to be concealed, from creditors and from the United States Bankruptcy Trustee the following

payments from PFMA, which were property of the estate, by diverting these payments to National Penn Bank account ending in #8960, which was titled to her:

DATE OF DEPOSIT	CHECK NO.	AMOUNT
April 18, 2011	9268	\$7,607.86
June 22, 2011	9414	\$3,210.28
September 8, 2011	9527	\$5,920.02
September 8, 2011	9556	\$5,789.11
September 8, 2011	9557	\$4,754.94
September 8, 2011	9518	\$2,997.06
September 8, 2011	9585	\$4,631.88

3. On or about the dates listed below, each date constituting a separate overt act, defendant ELIZABETH HIBBS knowingly and fraudulently concealed, and caused to be concealed, from creditors and from the United States Bankruptcy Trustee the following payments from PFMA, which were property of the bankruptcy estate, by diverting these payments to a business account at Wachovia/Wells Fargo Bank, titled to “Rapidly Recover, LLC” account ending in # 1264. Defendant HIBBS was the only authorized signatory on the account.

DATE OF DEPOSIT	CHECK NO.	AMOUNT
November 9, 2011	9677	\$4,727.09
November 9, 2011	9640	\$7,237.10
November 9, 2011	9654	\$4,692.34
November 9, 2011	9693	\$2,991.37
November 17, 2011	9706	\$3,014.41
November 28, 2011	9724	\$3,686.91
December 12, 2011	9749	\$2,243.20
December 12, 2011	9739	\$1,746.40
December 23, 2011	9773	\$4,430.86
December 28, 2011	9788	\$1,596.60
December 28, 2011	9797	\$5,326.80

DATE OF DEPOSIT	CHECK NO.	AMOUNT
January 13, 2012	9822	\$4,830.38
January 13, 2012	9801	\$2,916.35
February 3, 2012	9850	\$4,942.20
February 3, 2012	9851	\$1,419.92
February 3, 2012	9836	\$614.59
February 8, 2012	9866	\$2,269.17
February 16, 2012	9873	\$1,018.26
February 27, 2012	9888	\$2,250.81
March 1, 2012	9897	\$1,562.71
March 9, 2012	9918	\$385.01
March 21, 2012	9921	\$1,053.89
April 9, 2012	9954	\$1,629.68
April 9, 2012	9938	\$4,308.81
April 11, 2012	9975	\$453.07
April 19, 2012	9983	\$4,555.65
April 23, 2012	9968	\$3,429.76
May 2, 2012	9992	\$4,060.33
May 10, 2012	10015	\$3,093.08
May 10, 2012	10022	\$5,571.57
May 18, 2012	10035	\$1,103.88
May 23, 2012	10043	\$2,735.05
June 18, 2012	10073	\$1,689.17
June 25, 2012	10092	\$1,528.95
June 25, 2012	10059	\$2,239.99
July 10, 2012	10085	\$2,315.53

4. On or about the dates listed below, each date constituting a separate overt act, defendant ELIZABETH HIBBS knowingly and fraudulently concealed and caused to be concealed from creditors and from the United States Bankruptcy Trustee, the following payments from PFMA, which were property of the bankruptcy estate and which she deposited or caused to be deposited into a personal account at Bank of America, account ending in #0968, titled as "Elizabeth Hibbs."

DATE OF DEPOSIT	CHECK NO.	AMOUNT
July 29, 2011	9490	\$5,283.52
October 17, 2011	9586	\$3,065.99
DATE OF DEPOSIT	CHECK NO.	AMOUNT
October 17, 2011	9614	\$2,596.85

October 17, 2011	9602	\$2,934.21
October 17, 2011	9624	\$4,165.77

5. On or about the dates listed below, each date constituting a separate overt act, defendant WILLIAM J. O'BRIEN III knowingly and fraudulently concealed, and caused to be concealed, from creditors and from the United States Bankruptcy Trustee the following payments, which were property of the estate, by diverting these payments into Citizens Bank account ending in #2128 which was titled to him:

DATE OF DEPOSIT	PAYER	CHECK NO.	AMOUNT
July 13, 2011	Ohio Casualty	1008141653	\$4,000
July 13, 2011	Gaber Law Offices	5102	\$1,500
July 27, 2011	Gaber Law Offices	5123	\$2,300
August 3, 2011	Gaber Law Offices	5168	\$2,000
August 15, 2011	Treasurer of PA	8224180	\$4,000
August 15, 2011	Treasurer of PA	8225110	\$4,000
August 24, 2011	Gaber Law Offices	5225	\$3,500
August 24, 2011	Risk Enterprise	70255047	\$5,000
August 29, 2011	Gallagher Basset	67580399	\$4,000
October 12, 2011	Broadspire	6510835835	\$4,000
October 12, 2011	IMX Medical	4387	\$4,000
December 12, 2011	Pilgrim's Pride	32285527	\$4,000
February 13, 2012	Gaber Law Office	5754	\$3,200
February 24, 2012	Gaber Law Office	5783	\$500
March 2, 2012	Gaber Law Office	5849	\$1,400
April 2, 2012	Gaber Law Office	5927	\$600
April 2, 2012	Gaber Law Office	5908	\$400
May 29, 2012	CompServices	1276652	\$2,000
May 31, 2012	Gaber Law Office	6142	\$3,500

6. On or about the dates listed below, each date constituting a separate overt act, defendant WILLIAM J. O'BRIEN III knowingly and fraudulently concealed, and cause to be concealed, from creditors and from the United States Bankruptcy Trustee the following payments, which were property of the bankruptcy estate, by diverting these payments to a business account at TD Bank, titled as "Dr. Bill O'Brien, LLC," account # 7274. Defendant

O'BRIEN was the only authorized signatory on the account.

DATE OF DEPOSIT	PAYER	CHECK NO.	AMOUNT
August 3, 2012	Gaber Law Office	6298	\$3,000
August 7, 2012	Gaber Law Office	6444	\$3,000
August 31, 2012	Gaber Law Office	6492	\$400
September 14, 2012	Leslie J. Jandoli, Esq.	1092	\$40,000
October 3, 2012	Gaber Law Office	6592	\$1,000

All in violation of Title 18, United States Code, Section 371.

COUNT ONE HUNDRED THIRTY-EIGHT
(False Oath in Bankruptcy Proceedings)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about June 13, 2012, in the Eastern District of Pennsylvania,
defendant

ELIZABETH HIBBS
a/k/a “Elizabeth O’Brien”

knowingly and fraudulently made a false material statement under oath in, and in relation to In re WJO, Inc., bankruptcy case number 10-19894, by falsely testifying at a hearing before a United States Bankruptcy Judge that she personally performed the billing and collection services for Philadelphia Family Medical Associates, Inc., when in truth and in fact, and as the defendant well knew, the billing and collection services for Philadelphia Family Medical Associates, Inc. were performed by an employee of WJO, Inc.

In violation of Title 18, United States Code, Section 152(2).

COUNT ONE HUNDRED THIRTY-NINE
(False Oath in Bankruptcy Proceedings)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about October 6, 2014, in the Eastern District of Pennsylvania,
defendant

WILLIAM J. O'BRIEN III

knowingly and fraudulently made a false material statement under oath in and in relation to In re WJO, Inc., bankruptcy case number 10-19894, by falsely testifying at a deposition in connection with an adversary case that he personally received no income and took no money from his business, Dr. Bill O'Brien, LLC, that he "had nothing" and that he was living in a room in the office that he was renting in Levittown, when in truth and in fact, as defendant then well knew, the defendant received numerous cash payments for the sale of prescriptions for controlled substances which were not deposited into his business bank account.

In violation of Title 18, United States Code Section 152 (2).

NOTICE OF FORFEITURE # 1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1) set forth in this indictment, defendants

**WILLIAM J. O'BRIEN III,
MICHAEL THOMPSON,
a/k/a "Mikey,"
a/k/a "Tomato Pie,"
PETER MARRANDINO,
a/k/a "Petey Adams,"
a/k/a "Nose,"
JOSEPH MEHL,
a/k/a "Joseph Montanero,"
JOSEPH MITCHELL, SR.,
PATRICK TREACY,
a/k/a "Redneck,"
FRANK CORAZO, JR.,
a/k/a "Stalker,"
CHARLES JOHNSON, and
JENNIFER LYNN CHAMBERS,
a/k/a "Jennilynn,"**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses;

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including but not limited to:

i. A sum of money equal to at least \$5,000,000 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy to violate the Controlled Substances Act, for which the defendants are jointly and severally liable;

ii. \$10,290 in cash seized on or about January 29, 2015 from 1600 Arch Street, Unit xxx3, Philadelphia PA;

iii. \$3,000 in cash seized on or about January 29, 2015 from a 2008 KIA Sedona, Pennsylvania License Plate HBE5352, VIN #KNDMB23348624048; and

iv. \$1,256 in cash seized on or about January 29, 2015 from the person of William J. O'Brien III.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE #2

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956 set forth in this indictment, defendants

**WILLIAM J. O'BRIEN III and
ELIZABETH HIBBS,
a/k/a "Elizabeth O'Brien"**

shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property, including but not limited to:

- i. A sum of money equal to at least \$366,530 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy, for which the defendants are jointly and severally liable;
- ii. Approximately \$58,800 in cash seized on or about January 29, 2015 from TD Bank safety deposit box #1677 located in Philadelphia PA;
- iii. Jewelry seized on or about January 29, 2015 from TD Bank safety deposit box #1677 located in Philadelphia PA;
- iv. Approximately \$58,050 in cash seized on or about January 29, 2015 from TD Bank safety deposit box #422 located in Newtown PA;.
- v. Jewelry seized on or about January 29, 2015 from TD Bank safety deposit box # 422 located in Newtown, PA, including but not limited to, a loose diamond within a De Simone jewelry box;

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court; or
- d. has been substantially diminished in value,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property

of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(1).

NOTICE OF FORFEITURE #3

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 371 set forth in this indictment, for conspiracy to commit bankruptcy fraud, and violation of Title 18, United States Code, Section 152, defendants

**WILLIAM J. O'BRIEN III and
ELIZABETH HIBBS,
a/k/a "Elizabeth O'Brien"**

shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property, including but not limited to:

A sum of money equal to at least \$342,504 in United States currency, representing the amount of proceeds obtained as a result of the bankruptcy fraud conspiracy, for which the defendants are jointly and severally liable.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court; or
- d. has been substantially diminished in value,

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461, incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property

of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461.

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**