

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Mark Falk
:
v. : Mag. No. 21-16088 (MF)
:
LISA M. HOFFMAN : **CRIMINAL COMPLAINT**
:
: Filed Under Seal

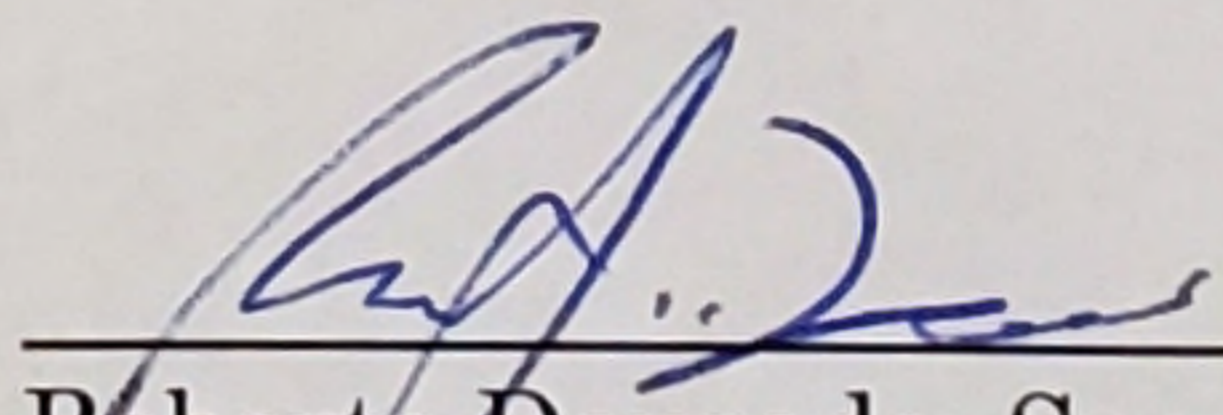
I, Roberto Dourado, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

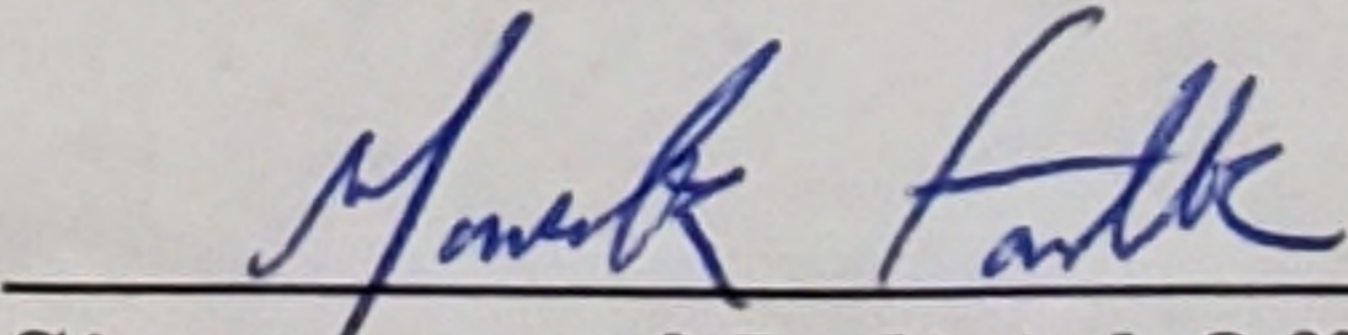


Roberto Dourado, Special Agent
Federal Bureau of Investigation

Special Agent Roberto Dourado attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

March 9, 2021, at 5:32 PM
District of New Jersey

HONORABLE MARK FALK
CHIEF U.S. MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A
(Theft of Medical Products)

From at least in or about August 2017 through on or about November 20, 2019, in Essex County, in the District of New Jersey, and elsewhere, defendant

LISA M. HOFFMAN

knowingly and intentionally in, and using any means and facility of, interstate commerce, embezzled, stole, and by fraud and deception obtained, and knowingly and unlawfully took, carried away, and concealed pre-retail medical products, namely, prescription HIV medications belonging to the U.S. Department of Veterans of Affairs ("VA"), while employed by, and an agent of, the VA, an organization in the supply chain for the pre-retail medical products.

In violation of Title 18, United States Code, Section 670.

ATTACHMENT B

I, Roberto Dourado, a Special Agent with the Federal Bureau of Investigation ("FBI"), having conducted an investigation and having discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause. Unless specifically indicated, all dates described in this affidavit are approximate and all conversations and statements described in this affidavit are related in substance and in part.

Relevant Individuals and Background Information

1. At all times relevant to this Criminal Complaint:
 - a. Defendant LISA M. HOFFMAN was a resident of Essex County, New Jersey.
 - b. The U.S. Department of Veterans Affairs ("VA") was a department of the United States government. The VA operated the Veterans Health Administration, a health care system that served nine million enrolled veterans each year, providing care at 1,255 health care facilities, including 170 medical centers. One of the VA's medical centers was the Veterans Affairs Medical Center in East Orange, New Jersey (the "VAMC").
 - c. The VAMC provided free outpatient pharmacy services to qualifying veterans, including dispensing certain prescription medications. The VAMC pharmacy maintained certain prescription medications, including HIV medications, that were required by federal and state law to be dispensed only pursuant to a prescription from a licensed health care professional.
 - d. From in or about 2005 through in or about November 2019, HOFFMAN was employed by the VA as a Pharmacy Procurement Technician at the VAMC outpatient pharmacy.
 - e. HOFFMAN's job responsibilities included, among other things, ordering the necessary drugs and supplies for the VAMC outpatient pharmacy, including making the determinations of when to place orders and for what products, as well as regularly maintaining inventory levels of needed drugs and supplies. Because of her employment, HOFFMAN had access to the VAMC pharmacy's supply of pharmaceutical products, including medications for the treatment of HIV. HOFFMAN was not authorized to remove medication from the VAMC pharmacy for her own purposes.

f. Wagner Checonolasco, a/k/a "Wanny" ("Checonolasco") was a resident of Bergen County, New Jersey, and was an associate of HOFFMAN.¹

2. From at least as early as in or about August 2017 through in or about November 2019, HOFFMAN used her position at VAMC as a Physician Procurement Technician to steal prescription HIV medications from the VAMC. HOFFMAN placed large orders for HIV medications purportedly on behalf of VAMC. After the medication arrived at the VAMC, HOFFMAN waited until co-workers were out of sight, removed the medication, secreted it, and exited the VAMC with the stolen medication.

3. Once HOFFMAN had the medication, HOFFMAN met Checonolasco, generally at HOFFMAN'S residence, so that HOFFMAN could sell the stolen HIV medication to Checonolasco in exchange for a cash payment. After obtaining the stolen HIV medication, Checonolasco resold it to others.

4. Surveillance footage from the VAMC showed HOFFMAN regularly taking dozens of bottles of HIV medications from the shelves of the VAMC outpatient pharmacy and placing them in a bag before walking them out of the VAMC and into her personal vehicle.

5. For example, on or about October 30, 2019, VAMC surveillance footage captured HOFFMAN taking HIV medications from the shelves of the VAMC outpatient pharmacy and placing them in a white mail bin. HOFFMAN then walked the mail bin full of HIV medications to her work area, where she placed it beneath her desk. A short while later, HOFFMAN transferred the medications from the mail bin to a bag located beneath her desk before leaving her desk area. HOFFMAN placed the bag containing the stolen HIV medications in her vehicle and drove away. Records from the VAMC revealed that approximately \$47,000 worth HIV medications were missing on or about October 31, 2019.

6. Additional surveillance footage shows HOFFMAN stealing HIV medications from the VAMC outpatient pharmacy on approximately five other occasions between on or about November 1, 2019 and on or about November 15, 2019. The stolen medications were valued at more than approximately \$280,000.

7. On or about November 20, 2019, VAMC surveillance footage showed HOFFMAN stealing additional HIV medications from the VAMC out-patient

¹ Checonolasco was charged by criminal complaint with conspiracy to steal government property in violation of 18 U.S.C. 371 on or about October 6, 2020 in the District of New Jersey. *United States v. Wagner Checonolasco*, Mag. No. 20-9376 (CLW).

pharmacy. That same day, law enforcement agents executed a search warrant on HOFFMAN's vehicle as she was leaving the VAMC and seized approximately 64 bottles of various HIV medications, which had an approximate value of \$76,300. That same day, law enforcement recovered \$14,490 in cash from HOFFMAN's residence pursuant to a search warrant.

8. During the scheme, HOFFMAN sold the stolen HIV medications to Checonolasco, who would then resell them. HOFFMAN received cash from Checonolasco in exchange for the stolen medication, frequently conducting the exchanges at HOFFMAN's residence. HOFFMAN and Checonolasco generally arranged to meet via WhatsApp messages. For example, on or about July 12, 2019, Checonolasco sent HOFFMAN a message via What's App, stating "I told you I got it. Imma get dress now and go and take it to you." Checonolasco responded with a picture of a wad of cash in hand with a \$100 bill on top and stated "On my way."

9. HOFFMAN and Checonolasco regularly communicated via mobile phone (by both messaging platforms and call) to plan and execute their thefts and sales. For example, on or about October 4, 2019, Checonolasco sent a WhatsApp message to HOFFMAN asking if HOFFMAN was able to steal the HIV medication. HOFFMAN complained that a coworker was in the pharmacy area, stating "we ain't getting no money if this bitch here." Checonolasco responded, "I need that bitch to leave." After HOFFMAN stole the medication, HOFFMAN and Checonolasco continued their WhatsApp message exchange to coordinate a meeting at HOFFMAN'S residence for Checonolasco to pick up the medication. HOFFMAN reported to Checonolasco at approximately 3:47 p.m.: "I'm home You'll be happy," meaning that HOFFMAN had successfully stolen the HIV medication, and was now home. Checonolasco responded, via WhatsApp, stating, "Good I'll be there in like 45 minutes," meaning that he was going to HOFFMAN's residence to pick up the HIV medication.

10. As another example, on or about November 1, 2019, HOFFMAN and Checonolasco coordinated another meeting at HOFFMAN's residence, after HOFFMAN stole HIV medications from the VAMC pharmacy. HOFFMAN messaged that she was on the way home. When Checonolasco responded, "Ok Im on my way to you now," HOFFMAN responded "Ok Bring my money." A surveillance recording from HOFFMAN's home shows Checonolasco arriving at HOFFMAN's residence that same day with a large black bag. Records from the VAMC pharmacy revealed that approximately \$63,000 worth of HIV medications were missing on or about November 1, 2019.

11. HOFFMAN stole approximately \$8,200,000 worth of HIV medications belonging to the VAMC during the period from in or about August 2017 through in or about November 2019.