
IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY

STATE OF MARYLAND

v.

KOFI SHAW-TAYLOR

2631 Greenbriar Lane

Annapolis, MD 21401

D.O.B.: 10/07/1949; SID#: MD972166; FBI #: AJAD2T5KC

Tracking Number: 17-7002-00078-1

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: August 4, 2017

CHARGES:

Conspiracy to Distribute CDS (Common Law / Md. Crim. Law Art. § 5-602) (Count 1)

Distribution of CDS: Westside (Md. Crim. Law Art. § 5-602(1)) (Counts 2 - 93)

Distribution of CDS Near School: Westside (Md. Crim. Law Art. § 5-627(a)(2)) (Counts 94-185)

Unlawful Prescription of CDS by Provider: Westside (Md. Crim. Law Art. § 5-902(c)) (Counts 186-277)

Medicaid Fraud Involving Death of Beneficiary E. F. (Md. Crim. Law Art. § 8-509, 8-516(a)) (Count 278)

Medicaid Fraud Involving Death of Beneficiary P. W. (Md. Crim. Law Art. § 8-509, 8-516(a)) (Count 279)

Conspiracy to Commit Medicaid Fraud (Common Law / Md. Crim. Law Art. §§ 8-509, 8-516(c)) (Count 280)

Medicaid Fraud (Md. Crim. Law Art. §§ 8-509, 8-516(c)) (Count 281)

Conspiracy to Commit Theft Scheme (Common Law / Md. Crim. Law Art. § 7-104) (Count 282)

Theft Scheme (Md. Crim. Law Art. § 7-104) (Count 283)

Conspiracy to Keep Common Nuisance: Starlife (Common Law / Md. Crim. Law Art. § 5-605(a)(2)) (Count 284)

Conspiracy to Keep Common Nuisance: Westside (Common Law / Md. Crim. Law Art. § 5-605(a)(2)) (Count 285)

Failure to File Income Taxes: Tax Years 2013 to 2016 (Md. Tax-General Art. § 13-1001(d)) (Counts 286-289)

WITNESSES:

Special Agent E. Troy Yeager
U.S. Department of Health and Human Services, Office of the Inspector General

Please issue a warrant and return for service to:
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STATE OF MARYLAND,

* **IN THE**

CIRCUIT COURT

v.

*

FOR ANNE ARUNDEL COUNTY

**KOFI SHAW-TAYLOR,
Defendant.**

*

* **CASE NO:** _____

TRACKING NO: 17-7002-00078-1

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INDICTMENT

The Grand Jurors for the State of Maryland for the body of the County of Anne Arundel do upon their oaths and affirmations charge:

COUNT ONE

(CONSPIRACY TO DISTRIBUTE CONTROLLED DANGEROUS SUBSTANCES)

BACKGROUND: STARLIFE WELLNESS CENTER

1. Beginning in or about June 2015 and through in or about April 2017, Defendants KOFI SHAW-TAYLOR, HAPPINESS AGUZIE, TORMARCO HARRIS, and MINNIE NDEM owned and/or operated Starlife Wellness Center LLC, 9 South Crain Highway, Glen Burnie, Maryland in the County of Anne Arundel (hereinafter, “Starlife”). In reality, Starlife operated as, in part, a “Pill Mill.” A Pill Mill is a physician’s office, clinic, or health care facility that routinely engages in the practice of prescribing and dispensing controlled dangerous substances outside the scope of professional practice and without a legitimate medical purpose.

2. Defendant SHAW-TAYLOR was a licensed physician who held Maryland medical license number D26832 and U.S. Drug Enforcement Agency (hereinafter, “DEA”) registration number AS2145476. Accordingly, Defendant SHAW-TAYLOR was qualified to prescribe controlled dangerous substances for legitimate medical purposes and in the usual scope of professional practice. Defendant SHAW-TAYLOR was also a provider recognized by the State of Maryland’s Medical Assistance Program (hereinafter, “Medicaid”) to provide services to beneficiaries with provider number 322721900. His practice area was urology with a purported medical specialty in pain management. Defendant SHAW-TAYLOR worked at Starlife beginning in or about 2016.

3. Defendant HARRIS had no known medical education, qualifications, or licensing in the State of Maryland or elsewhere. Defendant HARRIS was the owner and registered agent of Starlife. Per the Articles of Organization, the purpose of Starlife was “pain management.” Defendant HARRIS’s brother, Ronald Harris, served as “security” at Starlife.

4. Defendant AGUZIE was a licensed certified registered nurse practitioner who held Maryland medical license number R171878 and DEA registration number FO215086. As such, Defendant AGUZIE was qualified to prescribe controlled dangerous substances for legitimate medical purposes and in the usual scope of professional practice. Defendant AGUZIE was also a Medicaid provider with provider number 092404100. Defendant AGUZIE worked at Starlife starting in or about April 2016.

5. Defendant NDEM was a licensed certified registered nurse practitioner who held Maryland medical license number R132005 and DEA registration number MN3890870. As such, Defendant NDEM was qualified to prescribe controlled dangerous substances for legitimate medical purposes and in the usual scope of professional practice. Defendant NDEM was not an authorized Medicaid provider. Defendant NDEM worked at Starlife starting in or about June 2016.

6. Patients at Starlife paid for their visits in cash, which cost as much as approximately \$500 a visit. A patient would provide cash directly to Defendant HARRIS for the visit. HARRIS paid staff, physicians, and other licensed medical providers directly and in cash. Starlife kept patient files.

7. On at least two occasions at or about times relevant to this indictment, HARRIS—rather than the practitioner—handed the prescription for controlled dangerous prescriptions directly to the patient.

8. Defendant SHAW-TAYLOR wrote a letter in which he stated that Defendant HARRIS owed Defendant SHAW-TAYLOR \$20,000 for seeing patients at Starlife from on or about August 2016 to on or about September 2016. Defendant SHAW-TAYLOR wrote this demand letter on stationery from another Pill Mill, in part, as further described herein, that he owned and/or operated at times relevant to this indictment.

9. Although Starlife itself was not a Medicaid provider, beneficiaries could use Medicaid to pay for prescriptions obtained there.

10. Defendant J. ALEX McCLARY GREEN was seen on site on multiple occasions at Starlife and known there to be a “therapist.” Defendant GREEN was a licensed drug and alcohol counselor with medical license number LCA1679. Defendant GREEN allowed his drug and alcohol counselor license to expire in or about January 31, 2016, however, and it was not reinstated until May 18, 2017. Defendant GREEN was also a licensed clinical professional counselor with license number LC2308. Defendant GREEN did not have a DEA registration number and, accordingly, was not qualified to prescribe controlled dangerous substances.

BACKGROUND: WESTSIDE MEDICAL GROUP

11. At or about the same time and beginning on or about January 2013, Defendants SHAW-TAYLOR, AGUZIE, and GREEN owned and/or operated Westside Medical Group, 4419 Falls Road in Baltimore, Maryland, along with Defendants KWAME ASAFO-ADJEI, SABINA ACQUAH, LISA DIEHL, BRANDY GNACEK, and MONIQUE FORD.

12. A focus of Westside was pain management. But like Starlife, Westside was, in part, a Pill Mill. Westside was located across Falls Road from Western High School, at or about the oldest, all-girls, public high school remaining in the United States.

13. Defendant SHAW-TAYLOR worked at Westside from approximately on or about January 2010 to on or about May 2017.

14. Defendant AGUZIE worked at Westside from approximately on or about August 2015 to on or about June 2016.

15. Defendant GREEN worked at Westside at or about times relevant to this indictment. Defendant GREEN made modifications to or otherwise completed prescriptions written by Defendant SHAW-TAYLOR.

16. At times relevant to this indictment and lasting from at least on or about August 2013 to at least on or about October 2016, Defendant GREEN received prescriptions for oxycodone signed by Defendant SHAW-TAYLOR. In at least one instance, Defendant GREEN's prescription had no refill amount designated. Defendant SHAW-TAYLOR was aware as late as on or about March 1998 that Defendant Green had a history of drug abuse, including heroin, cocaine, and alcohol.

17. Defendant ASAFO-ADJEI was an attorney who was admitted to the District of Columbia Bar on December 5, 2011. As of this Indictment, he was not licensed to practice law in the State of Maryland. Defendant ASAFO-ADJEI was not qualified to prescribe controlled dangerous substances.

18. At or about time relevant to this indictment, Defendant ASAFO-ADJEI assisted with management at Westside, including handling cash payments. At or about times relevant to this indictment, Defendant ASAFO-ADJEI brought patient files to Defendant SHAW-TAYLOR in the County of Anne Arundel. At or about times relevant to this indictment, Defendant ASAFO-ADJEI, as an attorney, made modifications to or otherwise completed prescriptions that had been signed by Defendant SHAW-TAYLOR.

19. Defendant DIEHL worked at Westside starting in or about December 2016 to in or about April 2017. Defendant DIEHL was a manager of the office.

20. At or about times relevant to this Indictment, Defendant DIEHL provided patients with prescriptions signed by Defendant SHAW-TAYLOR but that she knew to have been modified or otherwise completed by Defendant ASAFO-ADJEI.

21. On or about January 25, 2017, Defendant DIEHL gave a prescription for oxycodone, a Schedule II narcotic, to at least one patient that was signed by Defendant SHAW-TAYLOR. Defendant knew or had reason to know that Defendant SHAW-TAYLOR had not seen the patient and that Defendant ASAFO-ADJEI had completed the prescription.

22. Defendant GNACEK worked at Westside from in or about December 2016 to in or about April 2017 as office staff. Defendant GNACEK was the daughter of Defendant DIEHL.

23. At or about times relevant to this Indictment, Defendant GNACEK provided patients with prescriptions signed by Defendant SHAW-TAYLOR but that she knew to have been modified or completed by Defendant ASAFO-ADJEI.

24. Defendant FORD worked at Westside starting in or about October 2016 to on or about April 2017 as a medical assistant. At or about times relevant to this Indictment, Defendant FORD provided patients with prescriptions signed by Defendant SHAW-TAYLOR but that she knew to have been modified or completed by Defendant ASAFO-ADJEI.

25. Defendant ACQUAH was responsible for submitting bills to Medicaid for qualifying services purportedly rendered at Westside. Defendant ACQUAH was the owner of Premier Medical Practice Solutions, and its only client was Defendant SHAW-TAYLOR. Defendant ACQUAH was responsible for billing for Defendant SHAW-TAYLOR starting in or about 2011 until present. ACQUAH was compensated for her services with a percentage of the payments collected each month.

26. Bills were submitted to Medicaid for office visits fraudulently represented to have been conducted by Defendant SHAW-TAYLOR. These purported office visits yielded prescriptions for controlled dangerous substances. In reality, these office visits were conducted by Defendant AGUZIE—not Defendant SHAW-TAYLOR. In at least approximately ten instances related to prescriptions otherwise charged herein, Medicaid paid from between approximately \$105.97 to approximately \$109.42 for each of these office visits.

27. Between on or about December 29, 2015 to on or about January 16, 2016, Defendant SHAW-TAYLOR traveled to Africa. Notwithstanding his absence, Medicaid paid approximately 286 claims for prescriptions purportedly written by Defendant SHAW-TAYLOR during on or about that period from approximately 138 beneficiaries for a total of approximately \$72,000. Notwithstanding his absence, Medicaid paid approximately 169 medical claims for office visits that were purportedly with Defendant SHAW-TAYLOR during on or about that period for approximately 162 beneficiaries for a total of approximately \$18,232.

28. Between on or about January 11, 2017 to on or about January 13, 2017, Defendant SHAW-TAYLOR was an inpatient undergoing back surgery. Notwithstanding his incapacitation, Medicaid paid approximately 89 claims for prescriptions purportedly written by Defendant SHAW-TAYLOR written during on or about that period from approximately 41 Medicaid beneficiaries for a total value of approximately \$23,424. Notwithstanding his incapacitation, Medicaid paid approximately 40 medical claims for office visits that were purportedly with Defendant SHAW-TAYLOR during on or about that period for approximately 40 beneficiaries for a total value of approximately \$4,421.

29. Some patients would pay for their visits to Westside in cash, which would cost as much as approximately \$450. Westside attracted large and unruly crowds of customers who would loiter outside the business each day. Customers would cause disturbances, have fights, and engage in transactions with others involving controlled dangerous substances.

30. On at least one occasion in or about May 2016, Defendant SHAW-TAYLOR purportedly discharged at least one patient from Westside for, in his words, “illegal possession of other patient’s narcotic prescription.” Nevertheless, Defendant SHAW-TAYLOR continued to write this patient prescriptions for oxycodone, a narcotic, and other substances for months afterwards.

31. Beginning in at least on or about early 2017, Defendant ACQUAH and Defendant SHAW-TAYLOR knew that there were issues with at least one of Defendant GREEN’s licenses.

32. In or about April 2017, federal and state authorities including the DEA and the U.S. Department of Health and Human Services, Office of the Inspector General executed a search warrant of Westside and Defendant SHAW-TAYLOR’s residence at 2631 Greenbriar Lane in Annapolis, Maryland in the County of Anne Arundel. Approximately \$83,612 in U.S. Currency was seized from Defendant SHAW-TAYLOR’s residence, and approximately \$3,523 in U.S. Currency was seized from Westside.

BACKGROUND: DATA

33. Medicaid pharmacy claims data showed that between on or about January 1, 2013 and on or about May 4, 2017, approximately 1,083 Medicaid beneficiaries were prescribed medication listing Defendant SHAW-TAYLOR as the prescriber. Defendant SHAW-TAYLOR was listed as the prescriber for 737 (68 percent) beneficiaries even though no corresponding medical visits were billed by either Defendant SHAW-TAYLOR or Westside. (Starlife was not a Medicaid provider and, as previously described, patients paid for their visits with cash.) During that same time period, 403 beneficiaries (37 percent) were prescribed 283,666 doses of oxycodone with Defendant SHAW-TAYLOR listed as the prescriber. Significantly, 336 beneficiaries (31 percent) received prescriptions for both opiates and benzodiazepines from Defendant SHAW-TAYLOR.

34. Medicaid pharmacy claims data showed that from on or about August 27, 2015 through on about June 30, 2017, Defendant AGUZIE was listed as prescriber for approximately 1,144 prescriptions for approximately 247 Medicaid beneficiaries. Looking just to this data, the top two drugs that Defendant AGUZIE prescribed were Alprazolam (27 percent), part of the benzodiazepine class of drugs, at approximately 320 prescriptions for approximately 25,116 pills, and oxycodone (26 percent) at approximately 305 prescriptions for 30,897 pills. The claims data showed that approximately 185 beneficiaries (74 percent) out of the approximately 247 beneficiaries for whom Defendant AGUZIE wrote prescriptions also received prescriptions that listed Defendant SHAW-TAYLOR as the prescriber.

35. By way of background, Maryland had a Prescription Drug Monitoring Program (hereinafter, "PDMP"). The purpose of the PDMP was to reduce the non-medical use, abuse, and diversion of prescription drugs by monitoring the prescribing and dispensing of drugs that contain controlled dangerous substances. Pharmacies and dispensing practitioners reported information for drug prescriptions that contain certain controlled dangerous substances. This included opiates and benzodiazepines, one of the focuses of this Indictment.

36. Examining just the period of on or about June 1, 2016 to on or about December 31, 2016, PDMP data showed that approximately 866 customers received prescriptions that listed Defendant SHAW-TAYLOR as the prescriber. Approximately 39 customers (4 percent) traveled over 25 miles (based on Westside's address), to see the prescriber. One customer, for example, traveled from Youngstown, Ohio (approximately 245 miles). Another customer traveled 122 miles from western Maryland. Other customers came from Salisbury, Maryland (approximately 86 miles) and from Leesburg, Virginia (approximately 50 miles). Twenty-eight out of the 39 customers (71 percent) that traveled over 25 miles to see the prescriber fulfilled claims for oxycodone. Seven of the 39 customers (17 percent) who traveled more than 25 miles received a drug combination of an opioid and a benzodiazepine.

37. Defendant HARRIS received approximately 5,922 units of drugs by way of 53 prescriptions for controlled dangerous substances between on or about March 18, 2016 and on or about July 5, 2017. (The term units is used as opposed to pills because certain prescriptions Defendant HARRIS received, including Codeine, a Schedule II narcotic, were dispensed in milliliters.) Nineteen prescriptions (35 percent) were for oxycodone, a Schedule II narcotic, for a total of approximately 2,121 pills. This amounted to approximately 4.5 pills of oxycodone per day for a single person, Defendant HARRIS. Defendant SHAW-TAYLOR was listed as the prescriber for 14 of these prescriptions for controlled dangerous substances to Defendant HARRIS (26 percent). Defendant NDEM was listed as the prescriber for 13 of these prescriptions to Defendant HARRIS (24 percent). Defendant AGUZIE was listed as the prescriber for Defendant HARRIS on at least one prescription.

38. Generally, a provider that sought reimbursement from Medicaid must have submitted a claim for reimbursement. Claims were submitted to the Maryland Department of

Health and Mental Hygiene (hereinafter, “DHMH”).¹ Payment was made by the Comptroller of Maryland (hereinafter, “the Comptroller”), which was headquartered at 80 Calvert Street, Annapolis, Maryland in the County of Anne Arundel.

39. The Comptroller was the chief financial officer for the State of Maryland and was also responsible for the collection of personal income taxes. An individual required to file a return under Title 10 of the Tax-General Article must have done so on or before the date due, regardless of whether the person owed income tax.

40. Here, at or about times relevant to this indictment and notwithstanding the volume of funds associated with this scheme, Defendants SHAW-TAYLOR, GREEN, ACQUAH, and NDEM each failed to file any income tax return on one or more occasions as required by Maryland law.

BACKGROUND: CONTROLLED DANGEROUS SUBSTANCES AND MEDICAID

41. At all times relevant to this indictment, the federal Controlled Substances Act (hereinafter, “the federal Act”) governed the manufacture, distribution, and dispensing of controlled dangerous substances in the United States, including narcotics prescribed by physicians and other licensed health care providers. The federal Act and its implementing regulations designated which drugs were controlled and assigned them to one of five schedules, Schedule I through V, depending on the potential for abuse, likelihood of physical or psychological dependency, and accepted medical use.

42. State law governing the manufacture, distribution, and dispensing of such substances was found in Title 5 of the Criminal Law section of the Maryland Code and promulgating regulations. Maryland law generally made use of the same Schedule I through V as federal law with some modifications by DHMH. Title 5 specifically defined “dispense” as to prescribe, which includes the issuance of narcotics prescriptions by physicians and other licensed health care providers.

43. Generally per Maryland law, a prescription for a “controlled dangerous substance” must have been made “for a legitimate medical purpose by an individual practitioner acting in the usual course of the individual practitioner’s professional practice.” COMAR 10.19.03.07C(1), citing 21 C.F.R. § 1306.04. Maryland law extended the “responsibility” for “proper prescribing and dispensing” beyond a physician or other licensed health care providers. A “corresponding responsibility” rested with the pharmacist who filled a prescription to ensure that both prescription and dispensing was proper. COMAR 10.19.03.07C, D.

¹DHMH changed its name effective July 1, 2017 to the Maryland Department of Health. Given the dates of when this scheme unfolded and largely transpired, this indictment will make use of DHMH.

44. Qualifying physicians and licensed health care providers were given a DEA registration number, which authorized them to dispense Schedule II through V controlled dangerous substances. A practitioner needed to have been in compliance with all laws regarding medical practice and drug prescription in order to receive and maintain a DEA registration number.

45. Medicaid would have paid qualifying physicians and licensed health care providers for certain costs associated with the care of beneficiaries. This would have included costs associated with the use of controlled dangerous substances for a legitimate medical purpose including examination by a qualifying physician or licensed health care provider as well as the cost of the prescription itself. Medicaid would not have paid, however, for services that were not medically necessary or provided in violation of federal or state law, for example.

46. At all times relevant to this Indictment, pain management was an accepted discipline and recognized medical subspecialty. Pain management experts had specialized knowledge, education, training, and experience to prescribe Schedule II through V controlled dangerous substances with a legitimate medical purpose and within the scope of prevailing standards of professional practice. A prescription for a Schedule II through V violated the federal Act and Maryland law when it was issued outside the scope of the prevailing standards of professional practice and without a legitimate medical purpose.

47. Schedule II drugs, including oxycodone that was a narcotic similar to morphine, had a high potential for abuse. Oxycodone was sold in generic form and under such brand names as OxyContin and Percocet. When legally prescribed for a legitimate medical purpose, oxycodone was used to treat moderate to severe pain. But even if taken as prescribed for a legitimate medical purpose, oxycodone could cause physical and psychological dependence. Schedule II drugs were also considered dangerous.

48. At all times relevant to this indictment, oxycodone was frequently abused as a highly-addictive narcotic capable of giving a user a high that was similar to heroin. Users abusing pills containing oxycodone could do so by smoking, chewing, dissolving, or crushing the pills to ingest the substance. Oxycodone could have been injected. These methods resulted in an immediate high because they allowed the active ingredient to enter a user's system more quickly.

49. Abuse of oxycodone, including its use in combination with other controlled dangerous substances, could have led to overdose and, in some cases, death. This risk of overdose was increased when oxycodone was abused along with such substances as Alprazolam or other benzodiazepines, a class of drugs having sedative and hypnotic or sleep-inducing properties. Combining opioids with benzodiazepines placed patients at an increased risk for respiratory depression, a condition that could have been life threatening. Benzodiazepines were Schedule IV drugs, which had a lower potential for abuse relative to other controlled dangerous substances.

50. Medical literature advised of the risk of combined use of opioid and benzodiazepines since on or about August 2012, if not earlier. The federal Substance Abuse and Mental Health Services Administration advised on or about December 2014, if not earlier, that the use of a benzodiazepine and oxycodone in combination could present “serious or even life threatening problems.” At least one patient file at Westside contained a letter from Defendant SHAW-TAYLOR that advised, in part, of “regulations and warning[s]” that a benzodiazepine and an opiate such as oxycodone “should not be prescribed simultaneously due to the high risk of respiratory depression which may even lead to death.”

51. Between on or about January 2015 and on or about June 2016, at least two men died who had been patients of and received prescriptions for controlled dangerous substances written by Defendant SHAW-TAYLOR and/or Defendant AGUZIE. Both of the men died as a result of intoxication from, among other substances, oxycodone. The men each received prescriptions at Westside for controlled dangerous substances, including oxycodone, in the weeks prior to their deaths. Both men were Medicaid beneficiaries.

52. At all times relevant to this indictment, drug diversion was the transfer of a prescribed controlled dangerous substance from the person to whom it was prescribed to another person for any illicit use and often in exchange for money or illicit substances such as cocaine or heroin. Opioids and benzodiazepines were among those prescription drugs that were most commonly diverted. One of the ways that a medical practitioner could have identified a patient’s diversion would have been through urine drug testing by which a provider could have assessed the presence of the prescribed medication.

53. At all times relevant to this indictment, drug abuse included the use of prescription drugs, including but not limited to opiates and benzodiazepines, for a nonmedical purpose, including in conjunction with illicit substances and other controlled prescription drugs. One of the methods by which a provider could have identified a patient’s drug abuse would have been through urine drug testing by which a provider could have assessed the presence of prescribed medications as well as other controlled prescription drugs and illicit drugs.

THE CHARGE

54. The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that the aforesaid DEFENDANT, late of the County of Anne Arundel, from on or about January 2013 through the present, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors to distribute and/or dispense controlled dangerous substances including but not limited to Schedule II, to wit: oxycodone in or near 9 South Crain Highway, Glen Burnie, Maryland in the County of Anne Arundel, State of Maryland, 4419 Falls Road, Baltimore Maryland 21211 in the City of Baltimore, State of Maryland, and/or other locations in violation of the Common Law and Criminal Law Article, Section 5-602 of the Maryland Code; against the peace, government and dignity of the State.

Common Law; Annotated Code of Maryland, Criminal Law Article § 5-602(1)
CJIS Code 2C0696
Felony: 20 years/\$25,000 fine

COUNTS 2 - 93 **(DISTRIBUTION CDS: WESTSIDE)**

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

55. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

56. The aforesaid DEFENDANT, late of the County of Anne Arundel, on or about the date listed below, in or near 4419 Falls Road in the City of Baltimore, Maryland, and acting by himself and/or in concert with at least one other individual whose names are known and unknown to the Jurors, did distribute and/or dispense a controlled dangerous substance of the schedule and to wit: the variety listed below to the Medicaid beneficiary listed below in violation of Criminal Law Article, Section 5-602 of the Maryland Code; against the peace, government and dignity of the State.

Count	Date	Schedule	Prescription	Medicaid Beneficiary
2	5/5/2015	Schedule IV Schedule IV Schedule II Schedule IV	90 pills of oxycodone, 10 mg (Refills Blank) 120 pills of Clonazepam (benzodiazepine), 2 mg (Refills Blank) 90 pills of oxycodone, 10 mg (Refills Blank) 60 pills promethazine, 25 mg (Refills Blank)	C. L.
3	5/7/2015	Schedule II	60 pills of oxycodone, 15 mg	C. L.
4	6/2/2015	Schedule IV Schedule IV Schedule II	90 pills of Carisoprodol, 350 mg (Refills Blank) 60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 60 pills of oxycodone, 15 mg	C. L.
5	6/26/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg (Refills Blank) 60 pills of Adderall, 30 mg (Refills Blank) 90 pills of Clonazepam (benzodiazepine), 1 mg (Refills Blank) 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.
6	8/24/2015	Schedule II Schedule II Schedule IV Schedule II	60 pills of Adderall ER, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 20 mg 120 pills of oxycodone, 30 mg	C. E.

7	8/25/2015	Schedule IV Schedule IV Schedule II	90 pills of Carisoprodol, 350 mg (2 refills) 60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 60 pills of oxycodone, 15 mg	C. L.
8	9/9/2015	Schedule IV Schedule II Schedule V	90 pills Alprazolam (benzodiazepine), 2 mg 90 pills oxycodone, 10 mg 6 pills of promethazine, 50 mg	R. H.
9	9/15/2015	Schedule II	180 pills oxycodone, 5 mg	R. H.
10	9/21/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 30 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.
11	11/12/2015	Schedule II Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (5 refills) 240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.
12	11/17/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.

13	11/19/2015	Schedule II	120 pills of oxycodone, 30 mg	N. F.
14	11/23/2015	Schedule II	120 pills of oxycodone, 15 mg	J. P.
15	12/1/2015	Schedule IV Schedule II	90 pills of Alprazolam, 2mg (3 refills) 90 pills of oxycodone, 15mg (Refills Not Marked)	S.C.
16	12/9/2015	Schedule IV Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg 240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.
17	12/14/2015	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills Carisoprodol, 350 mg (2 refills) 90 pills of oxycodone, 20 mg	C. L.
18	12/15/2015	Schedule IV Schedule II	30 pills of Clonazepam (benzodiazepine), .5 mg (Refills Not Marked) 180 pills of oxycodone, 15 mg	M. G.
19	12/16/2015	Schedule II	90 pills of oxycodone, 15mg	S.C.

20	12/17/2015	Schedule IV Schedule II	120 pills of oxycodone, 30mg, 90 pills of Alprazolam (2 refills)	N. F.
21	12/21/2015	Schedule IV Schedule II	60 pills of Lorazepam (benzodiazepine), 1 mg 120 pills of oxycodone, 15 mg (Refills Blank)	J. P.
22	1/19/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 15 mg (Refills Blank)	R. H.
23	1/20/2016	Schedule II	120 pills of oxycodone, 15 mg	J. P.
24	2/4/2016	Schedule IV Schedule II	60 pills of Clonazepam (benzodiazepine), .5 mg (2 refills) 180 pills of oxycodone, 15 mg	M. G.
25	2/10/2016	Schedule II	60 pills of oxycodone, 20 mg	C. L.
26	3/2/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of oxycodone, 30 mg	R. H.

27	3/3/2016	Schedule IV Schedule II	30 pills of Alprazolam (benzodiazepine), 2 mg (3 refills) 180 pills of oxycodone, 15 mg	M. G.
28	3/9/2016	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (3 refills) 60 pills of Carisoprodol, 250 mg (3 refills) 90 pills of oxycodone, 15 mg	C. L.
29	3/14/2016	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg (3 refills) 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg (Refills Blank)	C. E.
30	4/27/2016	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of methadone, 10 mg 90 pills of oxycodone, 30 mg	B. H.
31	5/16/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
32	5/16/2016	Schedule II	60 pills of Alprazolam, 2mg 45 pills of oxycodone, 15mg	S.C.
33	5/16/2016	Schedule II	180 pills of oxycodone, 15 mg	M. G.

34	6/1/2016	Schedule IV Schedule II Schedule IV	30 pills of Alprazolam (benzodiazepine), 2 mg (2 Refills) 120 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg (2 refills)	E. F.
35	6/6/2016	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 30 mg 60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	C. E.
36	6/8/2016	Schedule IV Schedule II Schedule V Schedule IV	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 30 mg 60 pills of promethazine, 50 mg 180 pills of tramadol, 50 mg	R. H.
37	6/15/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
38	6/15/2016	Schedule IV Schedule II	60 pills of Alprazolam, 2mg (3 refills) 45 pills of oxycodone, 15mg	S.C.
39	6/22/2016	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 240 pills of methadone, 10 mg 90 pills of oxycodone, 30 mg	B. H.
40	6/22/2016	Schedule II	180 pills of oxycodone, 15 mg	R. H.

41	6/29/2016	Schedule IV Schedule IV Schedule II Schedule IV	60 pills Alprazolam (benzodiazepine), 2 mg (3 refills) 90 pills Carisoprodol, 350 mg (3 refills) 60 pills oxycodone, 15 mg 180 pills tramadol, 50 mg (3 refills)	C. L.
42	7/5/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (1 refill) 90 pills of oxycodone, 5 mg	R. J.
43	7/6/2016	Schedule IV Schedule II	90 pills of Alprazolam, 2mg (2 refills) 120 pills of oxycodone, 15mg	S. H.
44	7/11/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
45	7/18/2016	Schedule IV Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (1 refill) 180 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg	R. H.
46	7/27/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 30 mg	N. F.
47	8/8/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.

48	8/15/2016	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 1 mg 30 pills of Ambien, 10 mg 180 pills of oxycodone, 15 mg	M. G.
49	8/22/2016	Schedule II	120 pills of oxycodone, 30 mg	N. F.
50	8/30/2016	Schedule IV Schedule II Schedule III	60 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of oxycodone, 5 mg 56 pills of Zubsolv (buprenorphine), 5.7 units	R. J.
51	8/31/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
52	9/12/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
53	9/14/2016	Schedule IV Schedule II Schedule II Schedule II	30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of methadone, 10 mg 120 pills of oxycodone, 15 mg 180 pills of oxycodone, 15 mg	B. H.
54	9/19/2016	Schedule II	120 pills of oxycodone, 30 mg	N. F.

55	9/26/2016	Schedule II	90 pills of oxycodone, 5 mg	R. J.
56	9/27/2016	Schedule IV	30 pills of Alprazolam (benzodiazepine), 2 mg 56 pills of Zubsolv (buprenorphine), 5.7 units	R. J.
57	9/28/2016	Schedule II Schedule II Schedule II	90 pills of oxycodone, 30 mg 480 pills of oxycodone, 5 mg 60 pills of Xtampza (oxycodone), 27 mg	J. P.
58	10/3/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
59	10/10/2016	Schedule II Schedule II	240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.
60	10/10/2016	Schedule IV Schedule IV	60 pills of Clonazepam (benzodiazepine), 2 mg (1 refill) 90 pills of oxycodone, 5 mg 56 pills of Zubsolv (buprenorphine), 8.6 units	R. J.
61	10/17/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

62	10/20/2016	Schedule IV Schedule II Schedule IV	90 pills of Alprazolam (benzodiazepine), 30 mg 180 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg (5 refills)	R. H.
63	10/24/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
64	10/26/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
65	10/26/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg (NR)	J. M.
66	11/14/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
67	11/19/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg	R. H.
68	11/21/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.

69	11/21/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
70	12/12/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg (Refills Not Marked)	R. H.
71	12/19/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
72	12/21/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
73	12/21/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
74	12/28/2016	Schedule II	120 pills of oxycodone, 15mg	S. H.
75	1/4/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg	R. H.

76	1/18/2017	Schedule II	60 pills of oxycodone, 15 mg	C. L.
77	1/18/2017	Schedule II	90 pills of oxycodone, 30 mg	J. P.
78	1/23/2017	Schedule IV Schedule II Schedule IV Schedule II Schedule II	30 pills of Abilify, 30 mg (5 refills) 60 pills of Adderall ER, 30 mg 90 pills of Clonazepam (benzodiazepine), 2 mg (5 refills) 60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 20 mg tablets	C. E.
79	1/23/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
80	1/25/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
81	2/6/2017	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 240 pills of methadone, 10 mg 180 pills of oxycodone, 30 mg	B. H.
82	2/22/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

83	2/25/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
84	3/7/2017	Schedule IV Schedule II Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 60 pills of MS Contin (Morphine), 30 mg 180 pills of oxycodone, 15 mg 120 pills of oxycodone, 15 mg	R. H.
85	3/13/2017	Schedule II	60 pills of oxycodone, 15 mg	C. L.
86	3/20/2017	Schedule IV Schedule II	60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 5 mg	R. J.
87	3/20/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
88	3/22/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
89	4/3/2017	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 1 mg 240 pills of methadone, 10 mg 240 pills of oxycodone, 15 mg	B. H.

90	4/12/2017	Schedule IV Schedule II Schedule IV	60 pills Clonazepam (benzodiazepine), 2 mg 60 pills oxycodone, 10 mg 60 pills Carisoprodol, 350 mg	C. L.
91	4/17/2017	Schedule II	60 pills oxycodone, 15 mg	C. L.
92	4/17/2017	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 30 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 20 mg	C. E.
93	4/19/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

Common Law; Annotated Code of Maryland, Criminal Law Article §§ 5-602(1)
 CJIS Code 2-0696
 Felony: 20 years/\$25,000 fine

COUNTS 94 – 185
(DISTRIBUTION CDS: 1,000 FEET OF A SCHOOL)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

57. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

58. The aforesaid DEFENDANT, late of the County of Anne Arundel, on or about the date listed in or near 4419 Falls Road, Baltimore Maryland 21211 in the City of Baltimore, State of Maryland, and acting by himself and/or in concert with at least one other individual

whose names are known and unknown to the Jurors, did distribute and/or dispense a controlled dangerous substance of the schedule and to wit: variety listed to the Medicaid beneficiary listed within 1,000 feet of Western High School, 4600 Falls Road, Baltimore, Maryland in violation of Criminal Law Article, Section 5-627(a)(2) of the Maryland Code; against the peace, government and dignity of the State.

Count	Date	Schedule	Prescription	Medicaid Beneficiary
94	5/5/2015	Schedule IV Schedule IV Schedule II Schedule IV	90 pills of oxycodone, 10 mg (Refills Blank) 120 pills of Clonazepam (benzodiazepine), 2 mg (Refills Blank) 90 pills of oxycodone, 10 mg (Refills Blank) 60 pills promethazine, 25 mg (Refills Blank)	C. L.
95	5/7/2015	Schedule II	60 pills of oxycodone, 15 mg	C. L.
96	6/2/2015	Schedule IV Schedule IV Schedule II	90 pills of Carisoprodol, 350 mg (Refills Blank) 60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 60 pills of oxycodone, 15 mg	C. L.
97	6/26/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg (Refills Blank) 60 pills of Adderall, 30 mg (Refills Blank) 90 pills of Clonazepam (benzodiazepine), 1 mg (Refills Blank) 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.

98	8/24/2015	Schedule II Schedule II Schedule IV Schedule II	60 pills of Adderall ER, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 20 mg 120 pills of oxycodone, 30 mg	C. E.
99	8/25/2015	Schedule IV Schedule IV Schedule II	90 pills of Carisoprodol, 350 mg (2 refills) 60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 60 pills of oxycodone, 15 mg	C. L.
100	9/9/2015	Schedule IV Schedule II Schedule V	90 pills Alprazolam (benzodiazepine), 2 mg 90 pills oxycodone, 10 mg 6 pills of promethazine, 50 mg	R. H.
101	9/15/2015	Schedule II	180 pills oxycodone, 5 mg	R. H.
102	9/21/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 30 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.
103	11/12/2015	Schedule II Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (5 refills) 240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.

104	11/17/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.
105	11/19/2015	Schedule II	120 pills of oxycodone, 30 mg	N. F.
106	11/23/2015	Schedule II	120 pills of oxycodone, 15 mg	J. P.
107	12/1/2015	Schedule IV Schedule II	90 pills of Alprazolam, 2mg (3 refills) 90 pills of oxycodone, 15mg (Refills Not Marked)	S.C.
108	12/9/2015	Schedule IV Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg 240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.
109	12/14/2015	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills Carisoprodol, 350 mg (2 refills) 90 pills of oxycodone, 20 mg	C. L.
110	12/15/2015	Schedule IV Schedule II	30 pills of Clonazepam (benzodiazepine), .5 mg (Refills Not Marked) 180 pills of oxycodone, 15 mg	M. G.

111	12/16/2015	Schedule II	90 pills of oxycodone, 15mg	S.C.
112	12/17/2015	Schedule IV Schedule II	120 pills of oxycodone, 30mg, 90 pills of Alprazolam (2 refills)	N. F.
113	12/21/2015	Schedule IV Schedule II	60 pills of Lorazepam (benzodiazepine), 1 mg 120 pills of oxycodone, 15 mg (Refills Blank)	J. P.
114	1/19/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 15 mg (Refills Blank)	R. H.
115	1/20/2016	Schedule II	120 pills of oxycodone, 15 mg	J. P.
116	2/4/2016	Schedule IV Schedule II	60 pills of Clonazepam (benzodiazepine), .5 mg (2 refills) 180 pills of oxycodone, 15 mg	M. G.
117	2/10/2016	Schedule II	60 pills of oxycodone, 20 mg	C. L.

118	3/2/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of oxycodone, 30 mg	R. H.
119	3/3/2016	Schedule IV Schedule II	30 pills of Alprazolam (benzodiazepine), 2 mg (3 refills) 180 pills of oxycodone, 15 mg	M. G.
120	3/9/2016	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (3 refills) 60 pills of Carisoprodol, 250 mg (3 refills) 90 pills of oxycodone, 15 mg	C. L.
121	3/14/2016	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg (3 refills) 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg (Refills Blank)	C. E.
122	4/27/2016	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of methadone, 10 mg 90 pills of oxycodone, 30 mg	B. H.
123	5/16/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
124	5/16/2016	Schedule II	60 pills of Alprazolam, 2mg 45 pills of oxycodone, 15mg	S.C.

125	5/16/2016	Schedule II	180 pills of oxycodone, 15 mg	M. G.
126	6/1/2016	Schedule IV Schedule II Schedule IV	30 pills of Alprazolam (benzodiazepine), 2 mg (2 Refills) 120 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg (2 refills)	E. F.
127	6/6/2016	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 30 mg 60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	C. E.
128	6/8/2016	Schedule IV Schedule II Schedule V Schedule IV	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 30 mg 60 pills of promethazine, 50 mg 180 pills of tramadol, 50 mg	R. H.
129	6/15/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
130	6/15/2016	Schedule IV Schedule II	60 pills of Alprazolam, 2mg (3 refills) 45 pills of oxycodone, 15mg	S.C.
131	6/22/2016	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 240 pills of methadone, 10 mg 90 pills of oxycodone, 30 mg	B. H.

132	6/22/2016	Schedule II	180 pills of oxycodone, 15 mg	R. H.
133	6/29/2016	Schedule IV Schedule IV Schedule II Schedule IV	60 pills Alprazolam (benzodiazepine), 2 mg (3 refills) 90 pills Carisoprodol, 350 mg (3 refills) 60 pills oxycodone, 15 mg 180 pills tramadol, 50 mg (3 refills)	C. L.
134	7/5/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (1 refill) 90 pills of oxycodone, 5 mg	R. J.
135	7/6/2016	Schedule IV Schedule II	90 pills of Alprazolam, 2mg (2 refills) 120 pills of oxycodone, 15mg	S. H.
136	7/11/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
137	7/18/2016	Schedule IV Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (1 refill) 180 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg	R. H.
138	7/27/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 30 mg	N. F.

139	8/8/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
140	8/15/2016	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 1 mg 30 pills of Ambien, 10 mg 180 pills of oxycodone, 15 mg	M. G.
141	8/22/2016	Schedule II	120 pills of oxycodone, 30 mg	N. F.
142	8/30/2016	Schedule IV Schedule II Schedule III	60 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of oxycodone, 5 mg 56 pills of Zubsolv (buprenorphine), 5.7 units	R. J.
143	8/31/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
144	9/12/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
145	9/14/2016	Schedule IV Schedule II Schedule II Schedule II	30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of methadone, 10 mg 120 pills of oxycodone, 15 mg 180 pills of oxycodone, 15 mg	B. H.

146	9/19/2016	Schedule II	120 pills of oxycodone, 30 mg	N. F.
147	9/26/2016	Schedule II	90 pills of oxycodone, 5 mg	R. J.
148	9/27/2016	Schedule IV	30 pills of Alprazolam (benzodiazepine), 2 mg 56 pills of Zubsolv (buprenorphine), 5.7 units	R. J.
149	9/28/2016	Schedule II Schedule II Schedule II	90 pills of oxycodone, 30 mg 480 pills of oxycodone, 5 mg 60 pills of Xtampza (oxycodone), 27 mg	J. P.
150	10/3/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
151	10/10/2016	Schedule II Schedule II	240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.
152	10/10/2016	Schedule IV Schedule IV	60 pills of Clonazepam (benzodiazepine), 2 mg (1 refill) 90 pills of oxycodone, 5 mg 56 pills of Zubsolv (buprenorphine), 8.6 units	R. J.

153	10/17/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
154	10/20/2016	Schedule IV Schedule II Schedule IV	90 pills of Alprazolam (benzodiazepine), 30 mg 180 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg (5 refills)	R. H.
155	10/24/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
156	10/26/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
157	10/26/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg (NR)	J. M.
158	11/14/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
159	11/19/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg	R. H.

160	11/21/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
161	11/21/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
162	12/12/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg (Refills Not Marked)	R. H.
163	12/19/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
164	12/21/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
165	12/21/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
166	12/28/2016	Schedule II	120 pills of oxycodone, 15mg	S. H.

167	1/4/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg	R. H.
168	1/18/2017	Schedule II	60 pills of oxycodone, 15 mg	C. L.
169	1/18/2017	Schedule II	90 pills of oxycodone, 30 mg	J. P.
170	1/23/2017	Schedule IV Schedule II Schedule IV Schedule II Schedule II	30 pills of Abilify, 30 mg (5 refills) 60 pills of Adderall ER, 30 mg 90 pills of Clonazepam (benzodiazepine), 2 mg (5 refills) 60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 20 mg tablets	C. E.
171	1/23/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
172	1/25/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
173	2/6/2017	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 240 pills of methadone, 10 mg 180 pills of oxycodone, 30 mg	B. H.

174	2/22/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
175	2/25/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
176	3/7/2017	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 60 pills of MS Contin (Morphine), 30 mg 180 pills of oxycodone, 15 mg 120 pills of oxycodone, 15 mg	R. H.
177	3/13/2017	Schedule II	60 pills of oxycodone, 15 mg	C. L.
178	3/20/2017	Schedule IV Schedule II	60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 5 mg	R. J.
179	3/20/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
180	3/22/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

181	4/3/2017	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 1 mg 240 pills of methadone, 10 mg 240 pills of oxycodone, 15 mg	B. H.
182	4/12/2017	Schedule IV Schedule II Schedule IV	60 pills Clonazepam (benzodiazepine), 2 mg 60 pills oxycodone, 10 mg 60 pills Carisoprodol, 350 mg	C. L.
183	4/17/2017	Schedule II	60 pills oxycodone, 15 mg	C. L.
184	4/17/2017	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 30 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 20 mg	C. E.
185	4/19/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

Common Law; Annotated Code of Maryland, Criminal Law Article § 5-627(a)(2)

CJIS Code 1-0483

Felony: 20 years/\$20,000 fine (First Offense); 40 years maximum/\$40,000 fine (Subsequent Offense)

COUNTS 186 - 277

(UNLAWFUL PRESCRIPTION OF CDS BY PROVIDER: WESTSIDE)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

59. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

60. The aforesaid DEFENDANT, late of the County of Anne Arundel, on or about the date listed in or near 4419 Falls Road, Baltimore, Maryland 21211 in the City of Baltimore, State of Maryland did as an authorized provider, and acting by himself and/or in concert with at least one other individual whose names are known and unknown to the Jurors, prescribe a controlled dangerous substance of the schedule listed, to wit: the variety listed to the Medicaid beneficiary listed below in violation of Criminal Law Article, Section 5-902(c) of the Maryland Code; against the peace, government and dignity of the State.

Count	Date	Schedule	Prescription	Medicaid Beneficiary
186	5/5/2015	Schedule IV Schedule IV Schedule II Schedule IV	90 pills of oxycodone, 10 mg (Refills Blank) 120 pills of Clonazepam (benzodiazepine), 2 mg (Refills Blank) 90 pills of oxycodone, 10 mg (Refills Blank) 60 pills promethazine, 25 mg (Refills Blank)	C. L.
187	5/7/2015	Schedule II	60 pills of oxycodone, 15 mg	C. L.
188	6/2/2015	Schedule IV Schedule IV Schedule II	90 pills of Carisoprodol, 350 mg (Refills Blank) 60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 60 pills of oxycodone, 15 mg	C. L.

189	6/26/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg (Refills Blank) 60 pills of Adderall, 30 mg (Refills Blank) 90 pills of Clonazepam (benzodiazepine), 1 mg (Refills Blank) 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.
190	8/24/2015	Schedule II Schedule II Schedule IV Schedule II	60 pills of Adderall ER, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 20 mg 120 pills of oxycodone, 30 mg	C. E.
191	8/25/2015	Schedule IV Schedule IV Schedule II	90 pills of Carisoprodol, 350 mg (2 refills) 60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 60 pills of oxycodone, 15 mg	C. L.
192	9/9/2015	Schedule IV Schedule II Schedule V	90 pills Alprazolam (benzodiazepine), 2 mg 90 pills oxycodone, 10 mg 6 pills of promethazine, 50 mg	R. H.
193	9/15/2015	Schedule II	180 pills oxycodone, 5 mg	R. H.
194	9/21/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 30 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.

195	11/12/2015	Schedule II Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (5 refills) 240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.
196	11/17/2015	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg	C. E.
197	11/19/2015	Schedule II	120 pills of oxycodone, 30 mg	N. F.
198	11/23/2015	Schedule II	120 pills of oxycodone, 15 mg	J. P.
199	12/1/2015	Schedule IV Schedule II	90 pills of Alprazolam, 2mg (3 refills) 90 pills of oxycodone, 15mg (Refills Not Marked)	S.C.
200	12/9/2015	Schedule IV Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg 240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.
201	12/14/2015	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills Carisoprodol, 350 mg (2 refills) 90 pills of oxycodone, 20 mg	C. L.

202	12/15/2015	Schedule IV Schedule II	30 pills of Clonazepam (benzodiazepine), .5 mg (Refills Not Marked) 180 pills of oxycodone, 15 mg	M. G.
203	12/16/2015	Schedule II	90 pills of oxycodone, 15mg	S.C.
204	12/17/2015	Schedule IV Schedule II	120 pills of oxycodone, 30mg, 90 pills of Alprazolam (2 refills)	N. F.
205	12/21/2015	Schedule IV Schedule II	60 pills of Lorazepam (benzodiazepine), 1 mg 120 pills of oxycodone, 15 mg (Refills Blank)	J. P.
206	1/19/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 15 mg (Refills Blank)	R. H.
207	1/20/2016	Schedule II	120 pills of oxycodone, 15 mg	J. P.
208	2/4/2016	Schedule IV Schedule II	60 pills of Clonazepam (benzodiazepine), .5 mg (2 refills) 180 pills of oxycodone, 15 mg	M. G.

209	2/10/2016	Schedule II	60 pills of oxycodone, 20 mg	C. L.
210	3/2/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of oxycodone, 30 mg	R. H.
211	3/3/2016	Schedule IV Schedule II	30 pills of Alprazolam (benzodiazepine), 2 mg (3 refills) 180 pills of oxycodone, 15 mg	M. G.
212	3/9/2016	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (3 refills) 60 pills of Carisoprodol, 250 mg (3 refills) 90 pills of oxycodone, 15 mg	C. L.
213	3/14/2016	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg (3 refills) 60 pills of MS Contin (Morphine), 30 mg 120 pills of oxycodone, 30 mg (Refills Blank)	C. E.
214	4/27/2016	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of methadone, 10 mg 90 pills of oxycodone, 30 mg	B. H.
215	5/16/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.

216	5/16/2016	Schedule II	60 pills of Alprazolam, 2mg 45 pills of oxycodone, 15mg	S.C.
217	5/16/2016	Schedule II	180 pills of oxycodone, 15 mg	M. G.
218	6/1/2016	Schedule IV Schedule II Schedule IV	30 pills of Alprazolam (benzodiazepine), 2 mg (2 Refills) 120 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg (2 refills)	E. F.
219	6/6/2016	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 30 mg 60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	C. E.
220	6/8/2016	Schedule IV Schedule II Schedule V Schedule IV	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 30 mg 60 pills of promethazine, 50 mg 180 pills of tramadol, 50 mg	R. H.
221	6/15/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
222	6/15/2016	Schedule IV Schedule II	60 pills of Alprazolam, 2mg (3 refills) 45 pills of oxycodone, 15mg	S.C.

223	6/22/2016	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 240 pills of methadone, 10 mg 90 pills of oxycodone, 30 mg	B. H.
224	6/22/2016	Schedule II	180 pills of oxycodone, 15 mg	R. H.
225	6/29/2016	Schedule IV Schedule IV Schedule II Schedule IV	60 pills Alprazolam (benzodiazepine), 2 mg (3 refills) 90 pills Carisoprodol, 350 mg (3 refills) 60 pills oxycodone, 15 mg 180 pills tramadol, 50 mg (3 refills)	C. L.
226	7/5/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg (1 refill) 90 pills of oxycodone, 5 mg	R. J.
227	7/6/2016	Schedule IV Schedule II	90 pills of Alprazolam, 2mg (2 refills) 120 pills of oxycodone, 15mg	S. H.
228	7/11/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
229	7/18/2016	Schedule IV Schedule II Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (1 refill) 180 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg	R. H.

230	7/27/2016	Schedule IV Schedule II	90 pills of Alprazolam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 30 mg	N. F.
231	8/8/2016	Schedule II Schedule II	60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 30 mg	J. P.
232	8/15/2016	Schedule IV Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 1 mg 30 pills of Ambien, 10 mg 180 pills of oxycodone, 15 mg	M. G.
233	8/22/2016	Schedule II	120 pills of oxycodone, 30 mg	N. F.
234	8/30/2016	Schedule IV Schedule II Schedule III	60 pills of Alprazolam (benzodiazepine), 2 mg 90 pills of oxycodone, 5 mg 56 pills of Zubsolv (buprenorphine), 5.7 units	R. J.
235	8/31/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
236	9/12/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.

237	9/14/2016	Schedule IV Schedule II Schedule II Schedule II	30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of methadone, 10 mg 120 pills of oxycodone, 15 mg 180 pills of oxycodone, 15 mg	B. H.
238	9/19/2016	Schedule II	120 pills of oxycodone, 30 mg	N. F.
239	9/26/2016	Schedule II	90 pills of oxycodone, 5 mg	R. J.
240	9/27/2016	Schedule IV	30 pills of Alprazolam (benzodiazepine), 2 mg 56 pills of Zubsolv (buprenorphine), 5.7 units	R. J.
241	9/28/2016	Schedule II Schedule II Schedule II	90 pills of oxycodone, 30 mg 480 pills of oxycodone, 5 mg 60 pills of Xtampza (oxycodone), 27 mg	J. P.
242	10/3/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
243	10/10/2016	Schedule II Schedule II	240 pills of methadone, 10 mg 120 pills of oxycodone, 30 mg	B. H.

244	10/10/2016	Schedule IV Schedule IV	60 pills of Clonazepam (benzodiazepine), 2 mg (1 refill) 90 pills of oxycodone, 5 mg 56 pills of Zubsolv (buprenorphine), 8.6 units	R. J.
245	10/17/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
246	10/20/2016	Schedule IV Schedule II Schedule IV	90 pills of Alprazolam (benzodiazepine), 30 mg 180 pills of oxycodone, 15 mg 180 pills of tramadol, 50 mg (5 refills)	R. H.
247	10/24/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
248	10/26/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
249	10/26/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg (NR)	J. M.
250	11/14/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

251	11/19/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg	R. H.
252	11/21/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
253	11/21/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
254	12/12/2016	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg (Refills Not Marked)	R. H.
255	12/19/2016	Schedule II	60 pills oxycodone, 15 mg	C. L.
256	12/21/2016	Schedule II	90 pills of oxycodone, 30 mg	J. P.
257	12/21/2016	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.

258	12/28/2016	Schedule II	120 pills of oxycodone, 15mg	S. H.
259	1/4/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 180 pills of oxycodone, 15 mg	R. H.
260	1/18/2017	Schedule II	60 pills of oxycodone, 15 mg	C. L.
261	1/18/2017	Schedule II	90 pills of oxycodone, 30 mg	J. P.
262	1/23/2017	Schedule IV Schedule II Schedule IV Schedule II Schedule II	30 pills of Abilify, 30 mg (5 refills) 60 pills of Adderall ER, 30 mg 90 pills of Clonazepam (benzodiazepine), 2 mg (5 refills) 60 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 20 mg tablets	C. E.
263	1/23/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
264	1/25/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

265	2/6/2017	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 240 pills of methadone, 10 mg 180 pills of oxycodone, 30 mg	B. H.
266	2/22/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
267	2/25/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.
268	3/7/2017	Schedule IV Schedule II Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 60 pills of MS Contin (Morphine), 30 mg 180 pills of oxycodone, 15 mg 120 pills of oxycodone, 15 mg	R. H.
269	3/13/2017	Schedule II	60 pills of oxycodone, 15 mg	C. L.
270	3/20/2017	Schedule IV Schedule II	60 pills of Clonazepam (benzodiazepine), 2 mg (2 refills) 90 pills of oxycodone, 5 mg	R. J.
271	3/20/2017	Schedule II Schedule IV Schedule II	90 pills of Adderall, 30 mg 30 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 20 mg	J. M.

272	3/22/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.
273	4/3/2017	Schedule IV Schedule II Schedule II	60 pills of Alprazolam (benzodiazepine), 1 mg 240 pills of methadone, 10 mg 240 pills of oxycodone, 15 mg	B. H.
274	4/12/2017	Schedule IV Schedule II Schedule IV	60 pills Clonazepam (benzodiazepine), 2 mg 60 pills oxycodone, 10 mg 60 pills Carisoprodol, 350 mg	C. L.
275	4/17/2017	Schedule II	60 pills oxycodone, 15 mg	C. L.
276	4/17/2017	Schedule II Schedule II Schedule IV Schedule II Schedule II	60 pills of Adderall ER, 30 mg 60 pills of Adderall, 30 mg 90 pills of Clonazepam (benzodiazepine), 1 mg 30 pills of MS Contin (Morphine), 30 mg 90 pills of oxycodone, 20 mg	C. E.
277	4/19/2017	Schedule IV Schedule II	60 pills of Alprazolam (benzodiazepine), 2 mg 120 pills of oxycodone, 30 mg	N. F.

Annotated Code of Maryland, Criminal Law Article § 5-902(c)

CJIS Code: None

Misdemeanor: 2 years/\$100,000 fine

COUNT 278
(MEDICAID FRAUD INVOLVING DEATH OF BENEFICIARY E.F.)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

61. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

62. The aforesaid DEFENDANT, late of the County of Anne Arundel, pursuant to one scheme and continuous course of conduct, did knowingly and willfully defraud a State Health Plan, to wit: Medicaid, a State Medical Assistance plan established in accordance with Title XIX of the federal Social Security Act of 1939 and administered by the State Department of Health, in connection with the delivery of and payment for health care services, and the violation resulted in the death of an individual on or about June 29, 2016, to wit: E.F., a black male born on or about March 3, 1961 and whose full name is known to the Jurors, in violation of Criminal Law Article, Section 8-509; against the peace, government and dignity of the State.

Annotated Code of Maryland, Criminal Law Article §§ 8-509, 8-516(a)
CJIS Code 2-2125
Penalty: Life/\$200,000 fine

COUNT 279
(MEDICAID FRAUD INVOLVING DEATH OF BENEFICIARY P. W.)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

63. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

64. The aforesaid DEFENDANT, late of the County of Anne Arundel, pursuant to one scheme and continuous course of conduct, did knowingly and willfully defraud a State Health Plan, to wit: Medicaid, a State Medical Assistance plan established in accordance with Title XIX of the federal Social Security Act of 1939 and administered by the State Department of Health, in connection with the delivery of and payment for health care services, and the violation resulted in the death of an individual on or about January 26, 2015, to wit: P. W., a black male born on or about October 16, 1962 and whose full name is known to the Jurors, in violation of Criminal Law Article, Section 8-509; against the peace, government and dignity of the State.

Annotated Code of Maryland, Criminal Law Article §§ 8-509, 8-516(a)
CJIS Code 2-2125
Penalty: Life/\$200,000 fine

COUNT 280
(CONSPIRACY TO COMMIT MEDICAID FRAUD)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

65. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

66. The aforesaid DEFENDANT, late of the County of Anne Arundel, from on or about January 2013 to present, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors to knowingly and willfully defraud a State Health Plan, to wit: Medicaid, a State Medical Assistance plan established in accordance with Title XIX of the federal Social Security Act of 1939 and administered by the State Department of Health, in the amount of at least \$1,000, in connection with the delivery of and payment for health care services, in violation of the Common Law and Criminal Law Article, Section 8-509; against the peace, government and dignity of the State.

Common Law; Annotated Code of Maryland, Criminal Law Article §§ 8-509, 8-516(c)
CJIS Code 2C2115
Penalty: 5 years/\$100,000 fine

COUNT 281
(MEDICAID FRAUD)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

67. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

68. The aforesaid DEFENDANT, late of the County of Anne Arundel, from on or about January 2013 to present, pursuant to one scheme and continuous course of conduct, did knowingly and willfully defraud a State Health Plan, to wit: Medicaid, a State Medical Assistance plan established in accordance with Title XIX of the federal Social Security Act of 1939 and administered by the State Department of Health, in the amount of at least \$1,000, in connection with the delivery of and payment for health care services, in violation of Criminal Law Article, Section 8-509; against the peace, government and dignity of the State.

Annotated Code of Maryland, Criminal Law Article §§ 8-509, 8-516(c)
CJIS Code 2-2115
Penalty: 5 years/\$100,000 fine

COUNT 282
(CONSPIRACY TO COMMIT THEFT SCHEME)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

69. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

70. The aforesaid DEFENDANT, late of the County of Anne Arundel, from on or about January 2013 to present, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors to steal property of the Medicaid program of the State of Maryland having a value of at least \$10,000 but less than \$100,000 in violation of the Common Law and Criminal Law Article, Section 7-104; against the peace, government and dignity of the State.

Common Law; Annotated Code of Maryland, Criminal Law Article § 7-104
CJIS Code 1-0623
Penalty: 15 years/\$15,000 fine

COUNT 283
(THEFT SCHEME)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

71. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

72. The aforesaid DEFENDANT, late of the County of Anne Arundel, from on or about January 2013 to present, did steal property of the Medicaid program of the State of Maryland having a value of at least \$10,000 but less than \$100,000 in violation of Criminal Law Article, Section 7-104; against the peace, government and dignity of the State.

Annotated Code of Maryland, Criminal Law Article § 7-104
CJIS Code 1-0623
Penalty: 15 years/\$15,000 fine

COUNT 284
(CONSPIRACY TO KEEP A COMMON NUISANCE: STARLIFE)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

73. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

74. The aforesaid DEFENDANT, late of the County of Anne Arundel, from June 2015 through present, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors to keep and maintain a common nuisance, to wit: 9 South Crain Highway, Glen Burnie, Maryland for the illegal dispensing of a controlled dangerous substance in violation of the Common Law and Criminal Law Article, Section 5-605(a)(2) of the Maryland Code; against the peace, government and dignity of the State.

Common Law; Annotated Code of Maryland, Criminal Law Article § 5-605(a)(2)

CJIS Code: 2C0330

Felony: 20 years/\$20,000 fine

COUNT 285
(CONSPIRACY TO KEEP A COMMON NUISANCE: WESTSIDE)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

75. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

76. The aforesaid DEFENDANT, late of the County of Anne Arundel, from on or about January 2013 through present, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors to keep and maintain a common nuisance, to wit: 4419 Falls Road, Baltimore, Maryland for the illegal dispensing of a controlled dangerous substance in violation of the Common Law and Criminal Law Article, Section 5-605(a)(2) of the Maryland Code; against the peace, government and dignity of the State.

Common Law; Annotated Code of Maryland, Criminal Law Article § 5-605(a)(2)

CJIS Code: 2C0330

Felony: 20 years/\$20,000 fine

COUNT 286
(FAILURE TO FILE TAX RETURN: TAX YEAR 2013)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

77. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

78. On or about April 15, 2014, in the County of Anne Arundel, and elsewhere, DEFENDANT, late of the County of Anne Arundel, did willfully fail to file a Maryland income tax return as required by law, in violation of Tax-General Article § 13-1001(d) of the Maryland Code; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article § 13-1001(d)
CJIS Code: 1-0831
Misdemeanor: 5 years/\$10,000 fine

COUNT 287
(FAILURE TO FILE TAX RETURN: TAX YEAR 2014)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

79. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

80. On or about April 15, 2015, in the County of Anne Arundel, and elsewhere, DEFENDANT, late of the County of Anne Arundel, did willfully fail to file a Maryland income tax return as required by law, in violation of Tax-General Article § 13-1001(d) of the Maryland Code; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article § 13-1001(d)
CJIS Code: 1-0831
Misdemeanor: 5 years/\$10,000 fine

COUNT 288
(FAILURE TO FILE TAX RETURN: TAX YEAR 2015)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

81. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

82. On or about April 15, 2016, in the County of Anne Arundel, and elsewhere, DEFENDANT, late of the County of Anne Arundel, did willfully fail to file a Maryland income tax return as required by law, in violation of Tax-General Article § 13-1001(d) of the Maryland Code; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article § 13-1001(d)
CJIS Code: 1-0831
Misdemeanor: 5 years/\$10,000 fine

COUNT 289
(FAILURE TO FILE TAX RETURN: TAX YEAR 2016)

The Jurors of the State of Maryland for the body of the County of Anne Arundel, do on their oath present that:

83. Paragraphs 1 through 53 are realleged and incorporated herein as if set forth in full.

84. On or about April 15, 2017, in the County of Anne Arundel, and elsewhere, DEFENDANT, late of the County of Anne Arundel, did willfully fail to file a Maryland income tax return as required by law, in violation of Tax-General Article § 13-1001(d) of the Maryland Code; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article § 13-1001(d)
CJIS Code: 1-0831
Misdemeanor: 5 years/\$10,000 fine

BRIAN E. FROSH
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mmiller@oag.state.md.us

TO THE PERSON CHARGED:

1. This paper charges you with committing a crime.
2. If you have been arrested and remain in custody, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
 - (A) Explaining the charges in this paper;
 - (B) Telling you the possible penalties;
 - (C) Helping you at trial;
 - (D) Helping you protect your constitutional rights; and
 - (E) Helping you get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.1 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. The court clerk will tell you how to contact the Public Defender.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

Defendant

Date/Time