

**FILED**

**OCT 26 2009**

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ581-09-2  
Superior Court  
Docket Number 09-10-00253-S

STATE OF NEW JERSEY	)	
	)	
v.	)	INDICTMENT
	)	
JANNAH RASHEEDAH AMATUL MUID	)	
	)	
SHIVONNE DLACY FORDE	)	
	)	
ALICIA STEPHENS	)	
	)	
NADEEM AKHTAR	)	
	)	
OMAR MOHAMMAD	)	
	)	
CALVIN OSEI	)	
	)	
NWALA GABRIEL	)	
	)	
SAMINA NADEEM	)	
	)	
PRICUS, INC., d/b/a CAMPUS PHARMACY	)	
	)	
ORANGE DRUGS, INC.	)	
	)	
AJARI, INC., d/b/a HARRISON PHARMACY	)	

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

COUNT ONE

(Conspiracy to Commit Health Care Claims Fraud and Medicaid Fraud-  
Second Degree)

JANNAH RASHEEDAH AMATUL MUID

SHIVONNE DLACY FORDE  
ALICIA STEPHENS  
NADEEM AKHTAR  
OMAR MOHAMMAD  
CALVIN OSEI  
NWALA GABRIEL  
PRICUS, INC. d/b/a CAMPUS PHARMACY  
ORANGE DRUGS, INC.  
AJARI, INC. d/b/a HARRISON PHARMACY

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about May 11, 2006, and on or about October 15, 2008, at the cities of East Orange and Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Health Care Claims Fraud and Medicaid Fraud, did agree that:

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

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

1. Knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did submit same or cause same to be submitted through Pharmacy of America and/or PRICUS, INC. d/b/a/CAMPUS PHARMACY and/or ORANGE DRUGS, INC. and/or AJARI, INC. d/b/a HARRISON PHARMACY for payment

or reimbursement for health care services to certain Medicaid beneficiaries, even though the said health care services, including dispensing of prescription medication, had not been provided to the intended Medicaid beneficiaries, or had been provided but returned, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and c; and

2. Knowingly and willfully made or caused to be made false statements or representations of material fact in claim forms or any document necessary to apply for or receive any benefit or payment under the New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq., with an intent to fraudulently secure payments or benefits not authorized under the Act, and this information was used to support claims for payment submitted by Pharmacy of America and/or PRICUS, INC. d/b/a/CAMPUS PHARMACY and/or ORANGE DRUGS, INC. and/or AJARI, INC. d/b/a HARRISON PHARMACY, Medicaid providers pursuant to N.J.S.A. 30:4D-3(h), when in fact JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI, and NWALA GABRIEL, knew the information was false in that said health care services, including the dispensing of prescription medication, had not been provided to the intended Medicaid beneficiaries, or had been provided but returned, contrary to the provisions of N.J.S.A. 30:4D-17b.

Among the means by which the said JANNAH RASHEEDAH AMATUL MUID,

SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI, and NWALA GABRIEL did carry out the conspiracy are the following:

IT WAS A PART OF THE SAID CONSPIRACY that during the relevant period JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI and NWALA GABRIEL were involved in a Health Care Claims Fraud and Medicaid Fraud ring involving Pharmacy of America, PRICUS, INC. d/b/a/CAMPUS PHARMACY and/or ORANGE DRUGS, INC. and/or AJARI, INC. d/b/a HARRISON PHARMACY that were among other things, paying customers United States currency for prescriptions in lieu of dispensing medication.

IT WAS A PART OF THE SAID CONSPIRACY that during the relevant period JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI, NWALA GABRIEL, through Pharmacy of America and/or PRICUS, .INC. d/b/a/CAMPUS PHARMACY and/or ORANGE DRUGS, INC. and/or AJARI, INC. d/b/a HARRISON PHARMACY billed Medicaid approximately \$2.3 million for fraudulent prescriptions and/or prescriptions that were not dispensed to the intended Medicaid beneficiaries, or that were dispensed, but returned.

IT WAS FURTHER A PART OF THE SAID CONSPIRACY that during the relevant period, Bryan Chandler, Owner and Operator of Samaritan Medical Clinic, routinely submitted fraudulent prescriptions to Pharmacy of America and/or ORANGE DRUGS, INC. and/or PRICUS, INC.

d/b/a CAMPUS PHARMACY for medications that were billed to Medicaid but were never dispensed to the intended Medicaid beneficiaries, or that were dispensed but returned.

IT WAS FURTHER A PART OF THE SAID CONSPIRACY that during the relevant period, JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI and Jovy Carino paid or caused Bryan Chandler to be paid thousands of dollars per month to provide prescriptions to Pharmacy of America and/or ORANGE DRUGS, INC. and/or PRICUS, INC. d/b/a CAMPUS PHARMACY for medications that were never dispensed to the intended Medicaid beneficiaries, or that were dispensed but returned, but were paid for by Medicaid

IT WAS FURTHER A PART OF THE SAID CONSPIRACY that during the relevant period JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI, Bryan Chandler and/or Jovy Carino paid or caused Medicaid beneficiaries to be paid for prescriptions that were never dispensed to the intended Medicaid beneficiaries, or that were dispensed, but returned, but were paid for by Medicaid.

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

OVERT ACTS

1. Between on or about May 2, 2007, and on or about October 9,

2007, a confidential informant and a Division of Criminal Justice Detective presented numerous prescriptions to Pharmacy of America technicians JANNAH RASHEEDA AMATUL MUID, SHIVONNE DLACY FORDE and/or ALICIA STEPHENS. Instead of dispensing prescriptions, the informant and the detective were paid United States currency for the prescriptions. The aforesaid prescriptions were billed to and paid by Medicaid, but were never dispensed to the detective or informant. Specifically, the following occurred:

a. On June 28, 2007, SHIVONNE DLACY FORDE paid a detective and an informant for prescriptions that were not dispensed, but billed to Medicaid.

b. On August 2, 2007, ALICIA STEPHENS paid a detective for prescriptions that were not dispensed, but billed to Medicaid.

c. On August 29, 2007, JANNAH RASHEEDA AMATUL MUID paid a detective for prescriptions that were not dispensed, but billed to Medicaid.

2. Between on or about October 2, 2007, and on or about January 24, 2008, a confidential informant presented prescriptions to ORANGE DRUGS, INC. pharmacy technician Jovy Carino. Instead of dispensing any medication, OMAR MOHAMMAD and NADEEM AKHTAR instructed Carino to pay the informant United States currency for the prescriptions. The aforesaid prescriptions were billed to and paid by Medicaid, but were never dispensed to the informant.

3. On or about January 17, 2008, Bryan Chandler met with NADEEM

AKHTAR at ORANGE DRUGS and obtained Promethazine with Codeine with a fraudulent prescription.

4. On or about January 23, 2008, Bryan Chandler met with NADEEM AKHTAR at ORANGE DRUGS and obtained Promethazine with Codeine with a fraudulent prescription.

5. Between on or about August 1, 2007, and November 30, 2007, Bryan Chandler paid United States currency to Medicaid beneficiaries for their prescriptions. He then brought the prescriptions to CALVIN OSEI at CAMPUS PHARMACY, where they were filled. Bryan Chandler then gave the medication back to CALVIN OSEI, and CALVIN OSEI paid Chandler a percentage of the amount paid by Medicaid for the prescriptions.

6. Between on or about August 28, 2006, and February 18, 2007, Pharmacy of America owner Herbert Brandt paid NWALA GABRIEL a sum of United States currency to allow Herbert Brandt to bill Pharmacy of America Medicaid prescriptions through AJARI, INC., d/b/a HARRISON PHARMACY. Brandt sent a pharmacy technician from Pharmacy of America to HARRISON PHARMACY with a list of claims allegedly dispensed to patients. The claims were billed to Medicaid using a HARRISON PHARMACY computer, thereby making it appear as though the prescriptions were filled by AJARI, INC., d/b/a HARRISON PHARMACY, when in fact the prescriptions were not filled at any pharmacy. By billing Pharmacy of America claims through AJARI, INC., d/b/a HARRISON PHARMACY, Brandt concealed the true number of claims

submitted to Medicaid by Pharmacy of America.

7. Between on or about August 28, 2006, and February 18, 2007, NWALA GABRIEL wrote checks totaling approximately \$89,136.45 to Pharmacy of America for Medicaid payments AJARI, INC., d/b/a HARRISON PHARMACY received for billing Pharmacy of America prescriptions. NWALA GABRIEL kept 10% of the Medicaid payments. NWALA GABRIEL billed for the prescriptions, but never dispensed any medication.

All in violation of N.J.S.A. 2C:5-2, N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-4.3, N.J.S.A. 30:4D-17, N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Health Care Claims Fraud - Second Degree)

NADEEM AKHTAR  
OMAR MOHAMMAD  
CALVIN OSEI  
NWALA GABRIEL  
PRICUS, INC. d/b/a CAMPUS PHARMACY  
ORANGE DRUGS, INC.  
AJARI, INC. d/b/a HARRISON PHARMACY

between on or about May 11, 2006, and on or about October 15, 2008, at the Cities of East Orange and Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did submit same or cause same to be submitted for payment or reimbursement for health care services; that is, the said NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI, NWALA GABRIEL, PRICUS, INC., d/b/a CAMPUS PHARMACY, ORANGE DRUGS, INC. AND AJARI, INC. d/b/a HARRISON PHARMACY, who are practitioners, did knowingly submit or cause to be submitted to Medicaid claims for prescription drugs allegedly dispensed to Medicaid beneficiaries when the medication was not dispensed to the intended Medicaid beneficiaries, or was dispensed but returned, contrary to the provisions of N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-4.3a and N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Health Care Claims Fraud - Second Degree)

JANNAH RASHEEDAH AMATUL MUID  
SHIVONNE DLACY FORDE  
ALICIA STEPHENS

between on or about May 11, 2006, and on or about October 15, 2008, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in five or more records, bills, claims or other documents, in writing, electronically or in any other form, and did submit same or cause same to be submitted for payment or reimbursement for health care services, and the aggregate pecuniary benefit obtained or sought to be obtained was at least one thousand dollars; that is, the said JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, AND ALICIA STEPHENS, who are not practitioners, did knowingly submit or cause to be submitted to Medicaid five or more claims for prescription drugs valued at at least one thousand dollars allegedly dispensed to Medicaid beneficiaries when the medication was not dispensed to the intended Medicaid beneficiaries, contrary to the provisions of N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-4.3c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Medicaid Fraud - Third Degree)

JANNAH RASHEEDAH AMATUL MUID  
SHIVONNE DLACY FORDE  
ALICIA STEPHENS  
NADEEM AKHTAR  
OMAR MOHAMMAD  
CALVIN OSEI  
NWALA GABRIEL  
PRICUS, INC. d/b/a CAMPUS PHARMACY  
ORANGE DRUGS, INC.  
AJARI, INC. d/b/a HARRISON PHARMACY

between on or about May 11, 2006, and on or about October 15, 2008, at the Cities of East Orange and Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly and wilfully make or cause to be made a false statement or representation of a material fact in a document necessary to receive any benefit under the New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq., with an intent to fraudulently secure payments or benefits not authorized under the Act; that is, the said JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI, NWALA GABRIEL, PRICUS, INC. d/b/a CAMPUS PHARMACY, ORANGE DRUGS, INC. and AJARI, INC. d/b/a HARRISON PHARMACY, did submit or cause to be submitted to Medicaid claims for prescription drugs allegedly dispensed to Medicaid beneficiaries known to the Grand Jurors when the medication was not dispensed to the intended Medicaid beneficiaries, or was dispensed but returned, contrary to the provisions of N.J.S.A. 30:4D-17b, N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Medicaid Fraud - Third Degree)

JANNAH RASHEEDAH AMATUL MUID  
SHIVONNE DLACY FORDE  
ALICIA STEPHENS  
NADEEM AKHTAR  
OMAR MOHAMMAD  
CALVIN OSEI  
NWALA GABRIEL  
PRICUS, INC. d/b/a CAMPUS PHARMACY  
ORANGE DRUGS, INC.  
AJARI, INC. d/b/a HARRISON PHARMACY

between on or about May 11, 2006, and on or about October 15, 2008, at the Cities of East Orange and Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly solicit, offer or receive any kickback, rebate or bribe in connection with the furnishing of items or services and/or the receipt of any benefit or payment made under the New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq.; that is, the said JANNAH RASHEEDAH AMATUL MUID, SHIVONNE DLACY FORDE, ALICIA STEPHENS, NADEEM AKHTAR, OMAR MOHAMMAD, CALVIN OSEI, NWALA GABRIEL, PRICUS, INC. d/b/a CAMPUS PHARMACY, ORANGE DRUGS, INC. and AJARI, INC. d/b/a HARRISON PHARMACY, did offer payments in connection with the furnishing of prescription drugs allegedly dispensed to Medicaid beneficiaries, contrary to the provisions of N.J.S.A. 30:4D-17c, N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Filing False or Fraudulent New Jersey  
~~Income Tax Resident Return - Third Degree~~)


CALVIN OSEI

between on or about April 17, 2007, and on or about April 15, 2008, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did prepare, file, or cause to be filed or assist in the preparation of a false or fraudulent return, report, statement, or application required to be filed pursuant to N.J.S.A. 54A-8-3.1, with the intent to evade, avoid or otherwise not make timely payment of New Jersey Income Tax required to be paid pursuant to N.J.S.A. 54A:8-1, that is the said, CALVIN OSEI did prepare, file, or cause to be filed or assist in the preparation of filing a false or fraudulent New Jersey Income Tax-Resident Return for tax years 2006 through 2007, with the intent to evade, avoid or otherwise not make timely payment of New Jersey Gross individual income tax, said returns required to be filed pursuant to the provisions of N.J.S.A. 54A:8-3.1, by under-reporting taxable income, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

(Tampering With Witnesses and Informants - Third Degree)

SAMINA NADEEM

between on or about January 24, 2008, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending, knowingly attempted to induce or otherwise cause a witness or informant to testify or inform falsely; that is, the said SAMINA NADEEM, believing that an investigation was pending, did knowingly confront Jovy Carino and told her to change her statement to investigators and falsely claim that her previous statement was incorrect, contrary to the provisions of N.J.S.A. 2C:28-5a(1) and against the peace of this State, the government and dignity of the same.



\_\_\_\_\_  
Riza Dagli  
Acting Insurance Fraud Prosecutor  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Dated: 10/26/09

**FILED**

OCT 26 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ581-09-2  
Superior Court  
Docket Number 09-10-00253-S

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

JANNAH RASHEEDAH )  
AMATUL MUID )

SHIVONNE DLACY FORDE )

ALICIA STEPHENS )

NADEEM AKHTAR )

OMAR MOHAMMAD )

CALVIN OSEI )

NWALA GABRIEL )

SAMINA NADEEM )

PRICUS, INC., d/b/a )  
CAMPUS PHARMACY )

ORANGE DRUGS, INC. )

AJARI INC. d/b/a )  
HARRISON PHARMACY )

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

IT IS ORDERED on this 26th day of October, 2009, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex be and hereby is designated as the County of venue for the purpose of trial.

