

FILED

APR 5 - 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ636-13-3

Superior Court

Docket Number _____

13-04-00059-S

STATE OF NEW JERSEY

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INDICTMENT

v.

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OLEG GORODETSKY

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

COUNT ONE

(CONSPIRACY - THIRD DEGREE)

Between on or about January 1, 2011 and on or about July 31, 2011, at the City of Elizabeth, in the County of Union, and at the Township of Piscataway, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

OLEG GORODETSKY

did, with the purpose of promoting or facilitating the commission of the crime of criminal running, agree with Christopher Montana, a chiropractor, and an attorney whose

identity is unknown to the Grand Jurors, that:

(a) they or one or more of them would knowingly engage in conduct which constitutes the aforementioned crime or an attempt or solicitation to commit such crime; or

(b) they or one or more of them would knowingly aid such other person or persons in the planning or commission of the aforementioned crime or of an attempt or solicitation to commit such crime;

that is criminal running, third degree, contrary to the provisions of N.J.S.A. 2C:21-22.1, and among the means by which said OLEG GORODETSKY, Christopher Montana and the aforementioned attorney agreed to carry out the conspiracy are the following:

(1) said OLEG GORODETSKY and Christopher Montana would refer patients to the aforementioned attorney as potential clients; and

(2) the aforementioned attorney, whose purpose was to seek to obtain benefits under a contract of insurance or assert a claim against an insured or an insurance carrier for providing services to clients or to obtain benefits under or assert a claim against a State or federal health care benefits program or prescription drug assistance program, would pay to said OLEG GORODETSKY and Christopher Montana a negotiated price for each such client referral.

Overt Acts

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

Between on or about January 1, 2011 and on or about July 31, 2011, said OLEG GORODETSKY and / or Christopher Montana provided certain patient names to the aforementioned attorney as potential clients;

all contrary to the provisions of N.J.S.A. 2C:5-2 and against the peace of this State, the government and dignity of the same.

COUNT TWO

(CRIMINAL USE OF RUNNERS - THIRD DEGREE)

On or about February 10, 2011, at the Township of Piscataway, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

OLEG GORODETSKY

did knowingly act as a runner or use, solicit, direct, hire or employ another to act as a runner, that is, said OLEG GORODETSKY did, for a pecuniary benefit, procure or attempt to procure a client, patient or customer at the direction of, request of or in cooperation with a provider whose purpose was to seek to obtain benefits under a contract of insurance or assert a claim against an insured or an insurance carrier for providing services to the client, patient or customer, or to obtain benefits under or assert a claim against a State or federal health care benefits program or prescription drug assistance program, to be specific, said OLEG GORODETSKY did knowingly act as a runner or use, solicit, direct, hire or employ another to act as a runner by procuring or attempting to procure clients at the direction of, request of or in cooperation with an attorney whose purpose was to seek to obtain benefits under contracts of insurance or assert a claim against an insured or an insurance

carrier for providing services to the clients or to obtain benefits under or assert a claim against a State or federal health care benefits program or prescription drug assistance program and whose identity is unknown to the Grand Jurors, in exchange for a \$3,000.00 cash payment, contrary to the provisions of N.J.S.A. 2C:21-22.1, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(CRIMINAL USE OF RUNNERS - THIRD DEGREE)

On or about March 8, 2011, at the City of Elizabeth, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

OLEG GORODETSKY

did knowingly act as a runner or use, solicit, direct, hire or employ another to act as a runner, that is, said OLEG GORODETSKY did, for a pecuniary benefit, procure or attempt to procure a client, patient or customer at the direction of, request of or in cooperation with a provider whose purpose was to seek to obtain benefits under a contract of insurance or assert a claim against an insured or an insurance carrier for providing services to the client, patient or customer, or to obtain benefits under or assert a claim against a State or federal health care benefits program or prescription drug assistance program, to be specific, said OLEG GORODETSKY, did knowingly act as a runner or use, solicit, direct, hire or employ another to act as a runner by procuring or attempting to procure clients at the direction of, request of or in cooperation with an attorney whose purpose was to seek to obtain benefits under contracts of insurance or assert a claim against an insured or an insurance

carrier for providing services to the clients or to obtain benefits under or assert a claim against a State or federal health care benefits program or prescription drug assistance program and whose identity is unknown to the Grand Jurors, in exchange for a \$8,000.00 cash payment, contrary to the provisions of N.J.S.A. 2C:21-22.1, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(CRIMINAL USE OF RUNNERS - THIRD DEGREE)

On or about April 21, 2011, at the City of Elizabeth, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

OLEG GORODETSKY

did, with the purpose of promoting or facilitating the commission of the crime of criminal running, solicit another person to commit the said crime of criminal running, aid or agree or attempt to aid such other person in planning or committing the said crime of criminal running, or having a legal duty to prevent the commission of the crime of criminal running, fail to make proper effort to do so, that is said OLEG GORODETSKY did - with the purpose of promoting or facilitating the procurement or attempted procurement of clients, patients or customers, in exchange for cash payments, at the direction of, request of or in cooperation with an attorney whose purpose was to seek to obtain benefits under a contract of insurance or assert a claim against an insured or an insurance carrier for providing services to the client, patient or customer, or to obtain benefits under or assert a claim against a State or federal health care benefits program or prescription drug assistance program and whose identity is unknown to the Grand

Jurors - aid or agree or attempt to aid Christopher Montana, a chiropractor, in planning the referral of, and / or referring, patients to the aforementioned attorney in exchange for a \$5,000 cash payment, contrary to the provisions of N.J.S.A. 2C:21-22.1 and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(CRIMINAL USE OF RUNNERS - THIRD DEGREE)

On or about July 21, 2011, at the City of Elizabeth, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

OLEG GORODETSKY


did, with the purpose of promoting or facilitating the commission of the crime of criminal running, solicit another person to commit the said crime of criminal running, aid or agree or attempt to aid such other person in planning or committing the said crime of criminal running, or having a legal duty to prevent the commission of the crime of criminal running, fail to make proper effort to do so, that is said OLEG GORODETSKY did - with the purpose of promoting or facilitating the procurement or attempted procurement of clients, patients or customers, in exchange for cash payments, at the direction of, request of or in cooperation with an attorney whose purpose was to seek to obtain benefits under a contract of insurance or assert a claim against an insured or an insurance carrier for providing services to the client, patient or customer, or to obtain benefits under or assert a claim against a State or federal health care benefits program or prescription drug

assistance program and whose identity is unknown to the Grand Jurors - aid or agree or attempt to aid Christopher Montana, a chiropractor, in planning the referral of, and / or referring, patients to the aforementioned attorney in exchange for a \$3,000 cash payment, contrary to the provisions of N.J.S.A. 2C:21-22.1 and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.



Ronald Chillemi
Acting Insurance Fraud Prosecutor
Division of Criminal Justice

A TRUE BILL:

 _____, Foreperson
Dated: 4/5/13

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State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
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Docket Number 13-04-00059-S

STATE OF NEW JERSEY)

v.)

OLEG GORODETSKY)

ORDER OF VENUE

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

IT IS ORDERED on this 5th day of April, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of ~~Morris~~ Middlesex be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of ~~Morris~~ Middlesex for filing.

Mary C. Jacobson AJS C
Mary C. Jacobson, A.J.S.C.