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U.S. DISTRICT COURT
SAVANNAH DIV.

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SO. DIST. OF GA.

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA

v.

SEAN MICHAEL CLARK,
ADELAIDA M. LIZAMA,
DANIEL JOHN WISE,
NAJAM AZMAT,
AKA "DR. HAZMAT,"
CANDACE ANNE CARRERAS,
SHELLY LYNN MORFORD

) INDICTMENT NO. **CR 413-028**
)
) VIO: 21 U.S.C. § 846
) Conspiracy
)
) 21 U.S.C. § 856(a)(1)
) Maintaining Drug-Involved Premises
)
) 21 U.S.C. § 841(a)(1)
) Unlawful Dispensation of
) Controlled Substances
)
) 21 U.S.C. § 841(a)(1)
) Distribution of Controlled Substance
)
) 18 U.S.C. § 1956(h)
) Conspiracy to Launder Monetary
) Instruments
)
) 18 U.S.C. § 2
) Aiding and Abetting
)
) 21 U.S.C. § 853
) Forfeiture
)
) 18 U.S.C. § 982
) Forfeiture

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Information:

1. The Controlled Substances Act, 21 U.S.C. §§ 841 et. seq.(CSA) governs the manufacture, distribution, and dispensing of controlled substances in the United States. With limited exceptions for medical professionals, the CSA makes it "unlawful for any person

knowingly or intentionally ... to manufacture, distribute, or dispense ... a controlled substance,” or conspire to do so.

2. Medical practitioners authorized to prescribe or dispense controlled substances by the jurisdiction in which they are licensed to practice medicine are authorized under the CSA to write prescriptions for or otherwise dispense controlled substances if they are registered with the Attorney General of the United States. Such medical practitioners are each assigned a unique registration number by the Drug Enforcement Administration (DEA).

3. A controlled substance is prescribed by a medical practitioner (physician) in the usual course of a professional practice and, therefore, lawfully, if the substance is prescribed by the physician in good faith as part of his medical treatment of a patient in accordance with the standard of medical practice generally recognized and accepted in the United States. Under Chapter 21, Code of Federal Regulations, Section 1306.04(a), medical practitioners registered with the DEA cannot issue a prescription unless it is "issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice An order purporting to be a prescription issued not in the usual course of professional treatment or in legitimate and authorized research [is] not a prescription within the meaning and intent of [the CSA] and the person knowingly filling such a purported prescription, as well as the person issuing it, [is] subject to the penalties provided for violations of the provisions relating to controlled substances."

4. The CSA and its implementing regulations set forth which drugs and other substances are defined by law as “controlled substances,” and those controlled substances are then assigned to one of five schedules, Schedule I, II, III, IV, or V, depending on their potential for abuse,

likelihood of physical or psychological dependency, accepted medical use, and accepted safety for use under medical supervision.

5. The term “Schedule II” means that the drug or other substance has a high potential for abuse; the drug has a currently accepted medical use with severe restrictions; and abuse of the drug or other substances may lead to severe psychological or physical dependence.

6. The term “Schedule III” means that the drug or other substance has a high potential for abuse less than the drugs listed in Schedule II; the drug has a currently accepted medical use with severe restrictions; and abuse of the drug or other substances may lead to severe psychological or physical dependence.

7. The term “Schedule IV” means that the drug or other substance has a low potential for abuse relative to the drugs or other substances in Schedule II; the drug or other substance has a currently accepted medical use in treatment; and abuse of the drug or other substances may lead to limited physical or psychological dependence relative to the drugs or substance in Schedule III.

8. Pursuant to the CSA and its implementing regulations, oxycodone is the generic name for a highly addictive prescription analgesic (pain relieving medication). The use of oxycodone in any form can lead to physical and/or psychological dependence, and abuse of the drug may result in addiction. It is classified as a Schedule II Controlled Substance. It is sold generically or under a variety of brand names, including Roxicodone, OxyContin, and Percocet. If legally prescribed for a legitimate medical purpose, these drugs are typically used to treat moderate to severe pain. Oxycodone and other Schedule II drugs have a high potential for abuse. This abuse can lead to addiction, overdose, and sometimes death.

9. Pursuant to the CSA and its implementing regulations, hydrocodone is the generic name for an addictive prescription analgesic. The use of hydrocodone in any form can lead to physical and/or psychological dependence, and abuse of the agent may result in addiction. When combined with some other drugs, the combination is classified as a Schedule III Controlled Substance, and is sold generically or under a variety of brand names, including Vicodin, Lortab, Lorcet and Norco. When hydrocodone is legally prescribed for a legitimate medical purpose, it is typically used to combat moderate to moderately severe pain.

10. Pursuant to the CSA and its implementing regulations, alprazolam is classified as a Schedule IV Controlled Substance, and is sold generically or under the brand name Xanax. When prescribed for a legitimate medical purpose, it typically is used to treat anxiety disorder, panic disorder, and anxiety caused by depression.

11. The term "dispense" means to deliver a controlled substance to an ultimate user or research subject by, or pursuant to the lawful order of, a practitioner, including the prescribing and administering of a controlled substance and the packaging, labeling or compounding necessary to prepare the substance for such delivery. The term "dispenser" means a practitioner who so delivers a controlled substance to an ultimate user or research subject. (21 U.S.C. § 802(10)).

12. The term "distribute" means to deliver (other than by administering or dispensing) a controlled substance or a listed chemical. The term "distributor" means a person who so delivers a controlled substance or a listed chemical. (21 U.S.C. § 802(11)).

13. The term "doctor shopping" refers to the practice of a patient requesting care from multiple physicians without making efforts to coordinate care or informing the physicians of the

other prescribing physicians in order to divert the drugs to others or feed their own addiction to certain prescription drugs by faking or exaggerating the extent of their true condition, or both.

14. The term "sponsor," in reference to the "pill mill" community, is a person who pays for all expenses associated with another person's appointment at a pain clinic in exchange for all or a portion of the other person's medications after the appointment.

15. Defendant **SEAN MICHAEL CLARK**, who has no known medical education or background, was an organizer and a marketer for East Health Center. Among other activities, **CLARK** also established bank accounts for East Health Center.

16. Defendant **ADELAIDA M. LIZAMA**, who has no known medical education or background, was an organizer of East Health Center. Among other activities, **LIZAMA** incorporated East Health Center, established bank accounts, helped train East Health Center staff, and performed administrative duties.

17. Defendant **DANIEL JOHN WISE**, who has no known medical education or background, began as a marketer for East Health Center and later became its on-site manager.

18. Defendant **NAJAM AZMAT** was at all times during the course of the conspiracy a medical doctor, licensed by the State of Georgia and registered by the United States Drug Enforcement Administration and worked as a physician at East Health Center, located at 626 Highway 80, Garden City, Chatham County, Georgia.

19. Defendant **CANDACE ANNE CARRERAS**, who has no known medical education or background, helped train the East health Center staff, ordered supplies and furniture, and performed administrative and financial duties for East Health Center.

20. Defendant **SHELLY LYNN MORFORD**, who has no known medical education or background, was the receptionist at East Health Center and performed various administrative duties.

COUNT ONE
CONSPIRACY
21 U.S.C. §846

21. Paragraphs 1 through 20 of the General Allegations section of this Indictment are realleged and incorporated fully herein by reference.

22. From an unknown date, but at least as early as September 2009, up to and including in or about December 2011, in Chatham County, in the Southern District of Georgia, and elsewhere, the defendants herein,

SEAN MICHAEL CLARK,
ADELAIDA M. LIZAMA,
DANIEL JOHN WISE,
NAJAM AZMAT,
AKA "DR. HAZMAT,"
CANDACE ANNE CARRERAS,
SHELLY LYNN MORFORD,

aided and abetted by each other and by other persons known and unknown, did knowingly and willfully combine, conspire, confederate and agree with other persons, both known and unknown, to commit the following offenses:

a) to knowingly and intentionally distribute and dispense, and cause to be distributed and dispensed, quantities of controlled substances, including oxycodone, a Schedule II Controlled Substance, hydrocodone, a Schedule III controlled substance, and alprazolam, a Schedule IV controlled substance, not for a legitimate medical purpose and not in the usual course of professional practice, contrary to Title 21, United States Code, Section 841(a)(1); and

b) to knowingly and intentionally open, lease, rent, use and maintain, and cause to be opened, leased, rented, used, and maintained, a certain place for the purpose of distributing and ^{KK} dispensing controlled substances unlawfully, including oxycodone, a Schedule II controlled substance, hydrocodone, a Schedule III controlled substance, and alprazolam, a Schedule IV controlled substance contrary to Title 21, United States Code, Section 856(a)(1).

PURPOSE AND OBJECT OF THE CONSPIRACY

23. It was the purpose and object of the conspiracy for the conspirators to enrich themselves by promoting, managing, and operating East Health Center, which unlawfully dispensed Schedule II, III, and IV controlled substances.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means of this conspiracy included the following:

24. The defendants operated and assisted in operating one or more nominal pain management facilities (pill mills) which dispensed controlled substances without any legitimate medical purpose.

25. Some members of the conspiracy gained experience in the workings of and management of pill mills in or about September 2009, and thereafter, when they began working at Margate Pain and Rejuvenation in Margate, Florida, a nominal pain management clinic in the Southern District of Florida.

26. Beginning in November 2009, some members of the conspiracy began managing and working at Palm Beach Pain and Rejuvenation in Boca Raton, Florida. Margate Pain and Rejuvenation and Palm Beach Pain and Rejuvenation were places that individuals could go to obtain controlled substances without a legitimate medical purpose. Margate Pain and

Rejuvenation and Palm Beach Pain and Rejuvenation mostly saw customers who lived outside of the State of Florida, particularly in the southeastern part of the United States. Customers at these clinics paid cash. The clinics did not accept payments from medical insurers. A high percentage of the customers at these clinics were drug addicts or drug seekers. Prescriptions were typically given for 210, 180, or 150 tablets of oxycodone, a Schedule II controlled substance, and for a large quantity of alprazolam, a Schedule IV controlled substance.

27. In or about December 2010, the conspirators, none of whom resided in the Southern District of Georgia, nor had any known connection thereto, met with each other and discussed opening East Health Center in the Southern District of Georgia in part because the Georgia laws dealing with pain clinics were less restrictive than those newly enacted in Florida and because it would be closer to their customer base.

28. In or about January 2011, the conspirators did knowingly open, lease, rent, use, operate and maintain, and cause to be opened, leased, rented, used, and maintained, East Health Center, located at 626 U.S. Highway 80, Garden City, Chatham County, Georgia, for the purpose of causing the unlawful dispensation of controlled substances. As with the Margate Pain and Rejuvenation and Palm Beach Pain and Rejuvenation clinics, East Health Center was a nominal "pain management clinic" which in fact was a pill mill engaged in the unlawful dispensation of Schedule II, III, and IV controlled substances. Prescriptions issued at East Health Center were done outside the usual course of professional practice and without legitimate medical purpose.

29. Members of the conspiracy marketed and advertised East Health Center by recruiting customers from other pill mills and by providing discounted rates to people who referred new customers to East Health Center.

30. In early 2011, conspirators opened bank accounts at SunTrust Bank and BB&T to promote and facilitate the criminal activity described herein.

31. In early 2011, conspirators hired employees and trained them on how to operate the pill mill.

32. Between February 2011 and May 2011, the conspirators employed medical doctors to work at East Health Center. The doctors who worked at East Health Center were typically paid cash at the end of each business day. The conspirators, by virtue of the medical licenses of doctors employed at the clinic, were able to provide to drug-seeking customers, prescriptions for schedule II, III and IV controlled substances. These customers were habituated to, and abusive users of, the controlled substances for which they obtained prescriptions. These prescriptions were issued for no legitimate medical reason and were prescribed in quantities greatly in excess of those which might be used for legitimate purposes.

33. The conspirators typically required an immediate payment of \$250 to \$350 as a clinic visit fee for new patients, typically in cash but at times by credit card. Follow-up patients were charged a visitation fee of \$200 to \$300. Neither medical insurance, checks, nor other forms of non-cash payment were accepted.

34. In order to create an appearance of legitimacy, new "patients" at the clinics were required to obtain or furnish magnetic resonance imaging ("MRI") reports before being allowed to be seen by a doctor.

35. Members of the conspiracy encouraged and accepted "sponsors" who brought one or more "patients" to subject pain clinics and paid for the patients' MRIs and all pain clinic fees in exchange for receiving all or a portion of the "patient's" prescription medications.

36. Members of the conspiracy distributed and dispensed, and cause to be distributed and dispensed, controlled substances that were not prescribed for a legitimate medical purpose, and not in the usual course of professional practice in one or more of the following manners:

- a) inadequate verification of the patient's medical complaint;
- b) cursory or no medical examinations by the attending doctors;
- c) inadequate patient medical history and no follow-up verification;
- d) incomplete or inadequate mental or physical examinations;
- e) insufficient dialogue with the patients regarding treatment options and risks and benefits of such treatments;
- f) treating patients with highly addictive controlled substances while failing to consider other treatment options;
- g) failure to refer patients to specialists for treatment;
- h) lack of, or inadequate diagnostic testing;
- i) increasing the patients' dosages over time;
- j) prescribing inappropriate combinations of drugs to patients;
- k) allowing patients to suggest or direct the medications to be prescribed;
- l) treating a large number of patients who resided either out of the state or long distances from East Health Center with prescriptions for highly addictive controlled substances;
- m) directing patients to particular pharmacies that were known to fill the prescriptions;
- n) prescribing highly addictive controlled substances to patients with vague physical complaints where alternative treatment options would be indicated;
- o) failing to assess the risk of abuse by individual patients;

p) failing to monitor patients' responses to the medication; and

q) issuing prescriptions for highly addictive controlled substances for an inordinately high percentage of younger adult patients.

37. It was further part of the conspiracy that the defendant and other members of the conspiracy hid and concealed and caused others to hide and conceal the nature of the illegal activity and the acts committed in furtherance thereof.

38. Between February 2011 and up to and including May 26, 2011, members of the conspiracy prescribed and caused to be prescribed more than 4 million milligrams of oxycodone. During this same period, prescriptions were written for more than 480 "patients" who lived outside the state of Georgia, including more than 130 from Kentucky; more than 50 from North Carolina; more than 30 from South Carolina; and more than 80 from Florida.

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Section 846.

COUNT TWO
MAINTAINING DRUG-INVOLVED PREMISES

THE GRAND JURY FURTHER CHARGES:

That from on or about January 1, 2011, continuing to on or about May 26, 2011, in Chatham County, within the Southern District of Georgia, the defendants herein,

**SEAN MICHAEL CLARK,
ADELAIDA M. LIZAMA,
DANIEL JOHN WISE,
NAJAM AZMAT,
AKA "DR. HAZMAT,"
CANDACE ANNE CARRERAS, and
SHELLY LYNN MORFORD,**

aided and abetted by each other and by others known and unknown, knowingly and intentionally opened and maintained a place known as East Health Center, located at 626 U.S. Highway 80, Garden City, Georgia for the purpose of dispensing Schedule II, III and IV controlled substances outside the usual course of professional practice and without legitimate medical purpose, in violation of Title 21, United States Code, Section 856(a)(1).

COUNTS THREE THROUGH FIFTY-ONE
UNLAWFUL DISPENSATION OF CONTROLLED SUBSTANCES

THE GRAND JURY FURTHER CHARGES THAT:

On each of the dates listed below, in Chatham County, within the Southern District of Georgia, the defendant,

**NAJAM AZMAT,
AKA "DR. HAZMAT,"**

who at all times hereinafter mentioned was a medical doctor, licensed by the State of Georgia and registered by the United States, aided and abetted by others known and unknown, including the defendants

**SEAN MICHAEL CLARK,
ADELAIDA M. LIZAMA,
DANIEL JOHN WISE,
CANDACE ANNE CARRERAS, and
SHELLY LYNN MORFORD,**

who as aiders and abettors are also criminally responsible for the offenses charged below, did, outside the usual course of professional practice as a medical doctor and without legitimate purpose relating to the practice of medicine, knowingly, intentionally and unlawfully dispense the Schedule II, Schedule III, and Schedule IV controlled substances listed below, in violation of Title 21, United States Code, Section 841 (a)(1):

Count	Date	Person to whom Dispensed	Controlled Substance	Strength	Quantity	Schedule
3	02/21/2011	Jim B. Frenchburg, KY	Oxycodone	30mg	180	II
4	02/21/2011	Jim B. Frenchburg, KY	Oxycodone	15mg	60	II
5	02/21/2011	George H. Frenchburg, KY	Oxycodone	30 mg	180	II
6	02/21/2011	George H. Frenchburg, KY	Oxycodone	15 mg	60	II
7	02/21/2011	Billy L. Kissimee, FL	Oxycodone	30 mg	180	II
8	02/21/2011	Billy L. Kissimee, FL	Oxycodone	15 mg	60	II
9	02/21/2011	Kim L. Kissimee, FL	Oxycodone	30 mg	60	II
10	02/21/2011	Kim L. Kissimee, FL	Oxycodone	15 mg	60	II
11	02/21/2011	David L. Kissimee, FL	Oxycodone	30 mg	90	II
12	02/21/2011	David L. Kissimee, FL	Oxycodone	15 mg	30	II
13	02/21/2011	Latina S. Frenchburg, KY	Oxycodone	30 mg	150	II
14	02/21/2011	Latina S. Frenchburg, KY	Oxycodone	15 mg	30	II
15	02/21/2011	Latina S. Frenchburg, KY	Xanax	1 mg	30	IV
16	02/25/2011	James L. Lexington, KY	Oxycodone	30 mg	150	II
17	02/25/2011	James L. Lexington, KY	Oxycodone	15 mg	60	II

Count	Date	Person to whom Dispensed	Controlled Substance	Strength	Quantity	Schedule
18	02/28/2011	Carlie C. Jackson KY	Oxycodone	30mg	150	II
19	02/28/2011	Carlie C. Jackson KY	Hydrocodone	10/325	60	III
20	02/28/2011	Paul C. Jackson KY	Oxycodone	30 mg	150	II
21	02/28/2011	Paul C. Jackson KY	Oxycodone	15mg	90	II
22	02/28/2011	Tyrice H. Jacksonville, FL	Oxycodone	30 mg	150	II
23	02/28/2011	Tyrice H. Jacksonville, FL	Oxycodone	15 mg	30	II
24	02/28/2011	Danelle P. Jacksonville, FL	Oxycodone	30 mg	150	II
25	02/28/2011	Danelle P. Jacksonville, FL	Oxycodone	15 mg	30	II
26	02/28/2011	Brian S. Brunswick, GA	Oxycodone	30	150	II
27	02/28/2011	Brian S. Brunswick, GA	Xanax	1 mg	15	IV
28	03/01/2011	Joseph B. Middleburg, FL	Oxycodone	30 mg	150	II
29	03/01/2011	Joseph B. Middleburg, FL	Oxycodone	15 mg	60	II
30	03/01/2011	Joseph B. Middleburg, FL	Xanax	1 mg	30	IV
31	03/01/2011	James G. Bluffton, SC	Oxycodone	30 mg	150	II
32	03/02/2011	Gary E. Barbourville KY	Oxycodone	30 mg	150	II

Count	Date	Person to whom Dispensed	Controlled Substance	Strength	Quantity	Schedule
33	03/02/2011	Gary E. Barbourville KY	Oxycodone	15 mg	30	II
34	03/03/2011	Chris C. Winter Park, FL	Oxycodone	30 mg	150	II
35	03/03/2011	Joshua M. Winter Park, FL	Oxycodone	30 mg	150	II
36	03/03/2011	Joshua M. Winter Park, FL	Percocet	10/325	60	II
37	3/08/2011	Patricia R. Lexington, KY	Oxycodone	30 mg	150	II
38	03/08/2011	Patricia R. Lexington, KY	Oxycodone	15 mg	60	II
39	03/08/2011	Jessica R. Means, KY	Oxycodone	30 mg	150	II
40	03/08/2011	Jessica R. Means, KY	Oxycodone	15 mg	60	II
41	03/09/2011	Troy R. London, KY	Oxycodone	30 mg	150	II
42	03/09/2011	Troy R. London, KY	Lorcet	10/500	30	II
43	03/10/2011	Barry H. Barbourville, KY	Oxycodone	30 mg	150	II
44	03/10/2011	Jason J. Mansfield, Ohio	Oxycodone	30 mg	150	II
45	03/10/2011	Jason J. Mansfield, Ohio	Oxycodone	15 mg	60	II
46	03/11/2011	Sherry F. Lexington, KY	Oxycodone	30 mg	150	II
47	03/11/2011	Sherry F. Lexington, KY	Oxycodone	15 mg	60	II

Count	Date	Person to whom Dispensed	Controlled Substance	Strength	Quantity	Schedule
48	03/14/2011	Nancy B. Morehead, KY	Oxycodone	30 mg	120	II
49	03/14/2011	Nancy B. Morehead, KY	Oxycodone	15 mg	90	II
50	03/15/2011	John K. Moncks Corner, SC	Oxycodone	30 mg	150	II
51	03/15/2011	John K. Moncks Corner, SC	Percocet	10/325	60	II

COUNT FIFTY-TWO
DISTRIBUTION OF CONTROLLED SUBSTANCE

THE GRAND JURY FURTHER CHARGES:

That on or about the 9th day of May 2011, in Chatham County, within the Southern District of Georgia, the defendant herein:

DANIEL JOHN WISE,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIFTY-THREE
CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS

THE GRAND JURY FURTHER CHARGES:

1. Paragraphs 1 through 38 of the Introduction section and Count One of this Indictment are realleged and incorporated fully herein by reference.

2. From an unknown date, but at beginning at least on or about January 18, 2011 and continuing through on or about May 26, 2011, in Chatham County, within the Southern District of Georgia, and elsewhere, the defendants herein,

**SEAN MICHAEL CLARK,
ADELAIDA M. LIZAMA,
DANIEL JOHN WISE,
NAJAM AZMAT,
AKA "DR. HAZMAT,"
CANDACE ANNE CARRERAS, and
SHELLY LYNN MORFORD,**

aided and abetted by each other and by others known and unknown, did knowingly and intentionally combine, conspire, and agree with each other and with other persons known and unknown, to conduct and attempt to conduct financial transactions affecting interstate commerce, with funds which were proceeds of a specified unlawful activity, that is unlawful dispensation of Schedule II, III, and IV controlled substances, not for a legitimate medical purpose and not in the usual course of professional practice, in violation of Title 21 United States Code, Sections 846 and 841(a)(1), and which the defendants knew to be the proceeds of some form of unlawful activity, and did conspire to do so with the intent to promote the carrying on of the aforesaid specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

OVERT ACTS

In furtherance of the conspiracy, the conspirators committed and caused to be committed in the Southern District of Georgia and elsewhere, financial transactions affecting interstate commerce, using funds which were, and which the defendants knew to be, proceeds of the

unlawful dispensation of Schedule II, III, and IV controlled substances, including, but not limited to, the transactions shown below:

1. Between January 18, 2011 and February 25, 2011, conspirators made multiple deposits, by check and cash, to SunTrust Bank Account No. 1000133995083 ranging in amount from \$6,000 to \$29,000.

2. On or about February 28, 2011, conspirators closed SunTrust Bank Account No. 1000133995083 and withdrew the sum of \$15,727.27, representing the balance of the account.

3. Between March 22, 2011 and May 25, 2011, conspirators made multiple cash deposits to BB&T Bank Account No. 0005242045442 ranging in amount from \$20.00 to \$9,622.00.

4. Between February 25, 2011 and May 18, 2011, conspirators made weekly salary payments by cash or check to **Sean Michael Clark** in amounts ranging between approximately \$1,000 and \$5,900.

5. Between February 11, 2011 and May 19, 2011, conspirators made weekly salary payments by cash or check to **Adelaida M. Lizama** in amounts ranging between approximately \$500 and \$1,850.

6. Between February 15, 2011 and May 19, 2011, defendants made weekly salary payments by cash or check to **Adelard LeFrancois** in amounts ranging between approximately \$1,000 and \$2,500.

7. Between February 19, 2011 and May 12, 2011, defendants made weekly salary payments by cash or check to **Daniel John Wise** in amounts ranging between \$700 and \$1,000.

8. Between February 19, 2011 and May 19, 2011, conspirators made weekly salary payments by cash or check to Konstantinos Afthinos in amounts ranging between approximately \$500 and \$600.

9. Between February 21, 2011 and May 18, 2011, conspirators made weekly salary payments by cash or check to Francis Barbuscia in amounts of approximately \$1,000.

10. Between February 25, 2011 and May 18, 2011, conspirators made weekly salary payments by cash or check to **Candace Anne Carreras** in amounts ranging between approximately \$400 and \$1,000.

11. Between March 1, 2011 and March 18, 2011, defendants made daily salary payments by cash, check, or credit card to **Najam Azmat** in amounts ranging between approximately \$1,000 and \$2,000.

12. Between March 31, 2011 and May 12, 2011, defendants made weekly salary payments by cash or check to **Shelly Lynn Morford** in amounts of \$600.

13. Between March 19, 2011 and May 25, 2011, defendants made daily salary payments by cash to Kenneth Gossett in amounts ranging between approximately \$1,500 and \$1,750.

14. Between April 4, 2011 and May 23, 2011, conspirators made payments by check in amounts ranging from \$365.00 to \$3,335.00 as “investor pay-backs” to Nuvest LLC.

15. Between March 1, 2011 and May 1, 2011, conspirators made periodic payments by cash and check to lease the premises located at 626 U.S. Highway 80, Garden City, Chatham County Georgia in which East Health Center was operated, and to rent a house located at 50 Crystal Lake Drive, Pooler, Chatham County, Georgia, where various conspirators, including

Daniel John Wise, Shelly Lynn Morford, and Konstantinos Afthinos resided from time to time during the course of the conspiracy.

16. Between January 21, 2011, and May 25, 2011, conspirators engaged in numerous credit card transactions to promote the unlawful conspiracy.

17. On or about May 26, 2011, **Adelaida M. Lizama** made a cash withdrawal of \$5,000 from BB&T Bank Account no. 0005242045442 after a search warrant was executed at East Health Center.

18. On or about May 26, 2011, **Sean Michael Clark** made a cash withdrawal of \$9,500 from BB&T Bank Account no. 0005242045442 after a search warrant was executed at East Health Center.

All done in violation of Title 18, United States Code, Sections 2 and 1956(h).

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER CHARGES AND FINDS PROBABLE CAUSE:

1. Drug Trafficking Offenses:

That upon conviction of one or more of the Title 21 offenses alleged in this indictment, each punishable by imprisonment for more than one year, the defendants herein:

**SEAN MICHAEL CLARK,
ADELAIDA M. LIZAMA,
DANIEL JOHN WISE,
NAJAM AZMAT,
AKA "DR. HAZMAT,"
CANDACE ANNE CARRERAS, and
SHELLY LYNN MORFORD,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all of their right, title and interest in and to any property, real and personal,

- (1) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (2) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code.

2. Money Laundering Offense:

A. Upon conviction for the violations of Title 18, United States Code, Section 1956(h), as charged in Count Fifty-Three of this Indictment, the defendants herein:

**SEAN MICHAEL CLARK,
ADELAIDA M. LIZAMA,
DANIEL JOHN WISE,
NAJAM AZMAT,
AKA "DR. HAZMAT,"**

**CANDACE ANNE CARRERAS, and
SHELLY LYNN MORFORD,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), all of their right, title and interest in and to any property, real and personal, involved in such offense, and any property traceable to such property.

3. Property:

A. Pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), and Title 18, United States Code, Section 982(a)(1), the property which is subject to forfeiture upon conviction of the Defendants for offenses charged in this Indictment includes, but is not limited to, the following property or property traceable to such property:

(1) Proceeds / Personal Money Judgment:

- (a) A sum of money equal to all proceeds the Defendants obtained directly or indirectly as a result of the Title 21 offenses charged in this Indictment, and all property used or intended to be used to facilitate such offenses, and equal to the value of all property, and any property traceable to such property, involved in money laundering transactions conducted as part of the money laundering conspiracy charged in Count Fifty-Three of this Indictment, that is, a minimum of \$365,000 in United States currency, and all interest and proceeds traceable thereto, in that such sum, in aggregate, was received by the defendants in exchange for the unlawful dispensation of controlled substances or is traceable thereto. If more than one defendant is convicted of an offense, the defendants so convicted are

jointly and severally liable for the amount subject to forfeiture under this paragraph.

4. Substitution of Assets:

A. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants –

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the said Defendant up to an amount equivalent to the value of the above-described forfeitable property;

By virtue of the commission by the defendants of the Title 21 felony drug offenses or of the Title 18 money laundering offense charged in this indictment, any and all interest the defendants have in the property subject to forfeiture is vested in the United States and is hereby forfeited to the United States pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1).

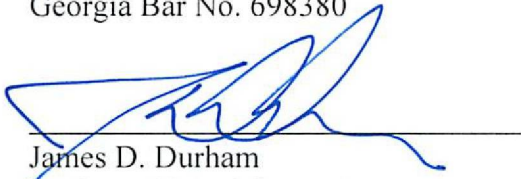
A True Bill.



Edward J. Tarver
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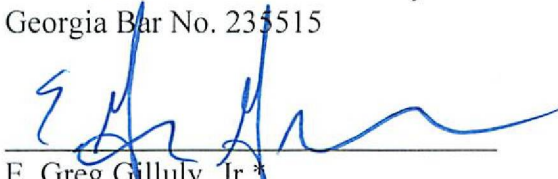
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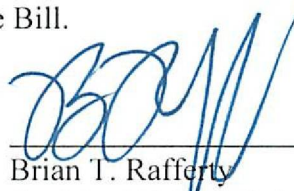
* counsel to be served


Foreperson

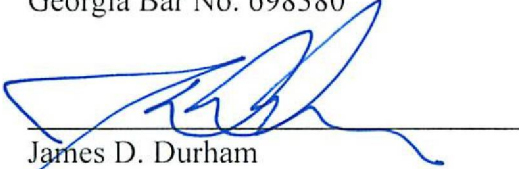
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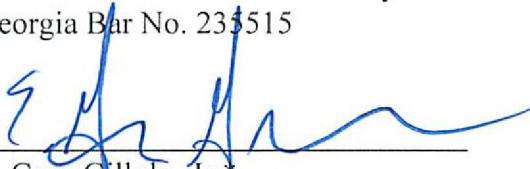
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