

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 86-80328

-vs-

VIO: 21 U.S.C. 846, 841(a)(1)  
18 U.S.C. 2  
21 U.S.C. 843(a)(2)

MILDRED PERKINS,  
DIANE NORMAN,  
ROBERT J. SILLERY, M.D.,  
ROBERT L. ALEXANDER, M.D.,  
AUGUSTINE KAYODE KOLE-JAMES, M.D.,  
ARTHURDELLER DORRIS, a/k/a Della,  
TAMARA HAMPTON,  
VALERIE J. GRASTY, a/k/a Jeanie,  
CHARISSA CLEMONS,

Defendants.

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §841(a)(1) and 846  
CONSPIRACY TO POSSESS WITH INTENT  
TO DISTRIBUTE AND TO DISTRIBUTE  
CONTROLLED SUBSTANCES)

1. At all times pertinent to this indictment, the following regulations and definitions were applicable:
  - a.) All prescriptions for controlled substances shall be dated as of, and signed on, the day when issued and shall bear the full name and address of the patient, and the name, address, and registration number of the practitioner. A practitioner may sign a prescription in the same manner as he would sign a check or legal document (e.g., J.H. Smith or

John H. Smith). Where an oral order is not permitted, prescriptions shall be written with ink or indelible pencil or typewriter and shall be manually signed by the practitioner. The prescriptions may be prepared by a secretary or agent for the signature of a practitioner, but the prescribing practitioner is responsible in case the prescription does not conform in all essential respects to the law and regulations. A corresponding liability rests upon the pharmacist who fills a prescription not prepared in the form prescribed by these regulations. (21 C.F.R. §1306.04[a]).

b.) A prescription for controlled substance may only be filled by a pharmacist acting in the usual course of his professional practice and either registered individually or employed in a registered pharmacy or may be filled by a registered institutional practitioner. (21 C.F.R. §1306.06).

c.) A prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription. 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 Section 309 of the Act (21 U.S.C. §829) and the person knowingly filling such a

purported prescription, as well as the person issuing it, shall be subject to the penalties provided for violations of the provisions of law relating to controlled substances.

(21 C.F.R. §1306.04(a)).

2. Robert J. Sillery was a medical doctor licensed to practice in the State of Michigan, who was registered to dispense controlled substances under DEA Registrant Number [REDACTED].

3. Robert L. Alexander was a medical doctor licensed to practice in the State of Michigan, who was registered to dispense controlled substances under DEA Registrant Number [REDACTED].

4. Augustine Kayode Kole-James was a medical doctor licensed to practice in the State of Michigan, who was registered to dispense controlled substances under DEA Registrant Number [REDACTED].

5. From on or about November, 1980, until on or about March, 1985, the exact dates being unknown, in the Eastern District of Michigan, Southern Division, and elsewhere, MILDRED PERKINS, DIANE NORMAN, ROBERT J. SILLERY, M.D., ROBERT L. ALEXANDER, M.D., AUGUSTINE KAYODE KOLE-JAMES, M.D., ARTHURDELLER DORRIS, TAMARA HAMPTON, VALERIE J. GRASTY, CHARISSA CLEMONS, and various other persons whose names are both known and unknown to the Grand Jury including George Shargel, M.D., Ernest T. Marshall, M.D., and Chikwendu Amechi, M.D., unindicted co-conspirators herein, did knowingly, willfully and unlawfully conspire, confederate

and agree together to commit an offense or offenses against the United States, contrary to the provisions of Sections 841(a)(1), Title 21, United States Code; all in violation of Section 846, Title 21, United States Code; that is to

- (a) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Oxycodone Hydrochloride (Percodan, Percocet), a Schedule II Narcotic Drug Controlled Substance.
- (b) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Methamphetamine (Desoxyn), a Schedule II Non-Narcotic Drug Controlled Substance.
- (c) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Diazepam (Valium), a Schedule IV Non-Narcotic Drug Controlled Substance.
- (d) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Phenmetrazine Hydrochloride (Preludin), a Schedule II Non-Narcotic Drug Controlled Substance.
- (e) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Methaqualone (Mequin, Parest, Quaalude), a Schedule II Non-Narcotic Drug Controlled Substance.
- (f) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Methylphenidate (Ritalin), a Schedule II Non-Narcotic Drug Controlled Substance.

- (g) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Pentazocine (Talwin), a Schedule IV Non-Narcotic Drug Controlled Substance.
- (h) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Hydrocodone (Hycodan, Tussionex), a Schedule III Narcotic Drug Controlled Substance.
- (i) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Secobarbital Sodium and Amobarbital Sodium (Tuinal), a Schedule II Non-Narcotic Drug Controlled Substance.
- (j) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Empirin 4 with Codeine, a Schedule III Narcotic Drug Controlled Substance.
- (k) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Tylenol 4, with Codeine, a Schedule III Narcotic Drug Controlled Substance.
- (l) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Glutethimide (Doriden), a Schedule III Non-Narcotic Drug Controlled Substance.
- (m) knowingly, intentionally and unlawfully possess with intent to distribute and to distribute Hydromorphone (Dilaudid), a Schedule II Narcotic Drug Controlled Substance.

It was part of said unlawful conspiracy that MILDRED PERKINS and DIANE NORMAN established and operated the Seven Mile-Orleans Medical Clinic, 1755 East Seven Mile Road, Detroit, Michigan, and thereafter established and operated the Kai Medical Clinic, 1755 East Seven Mile Road, which was later relocated to 17501 West Eight Mile Road, Detroit, Michigan.

It was further part of said conspiracy that DIANE NORMAN and MILDRED PERKINS established and operated the Delphine's Figure Seven Medical Clinic, 8448 West McNichols, Detroit, Michigan, later changing the clinic name to Six Mile Medical Clinic.

It was further part of said conspiracy that MILDRED PERKINS and DIANE NORMAN would and did use the above-stated medical clinics to distribute controlled substances by arranging to sell for profit prescriptions which were written outside the usual course of medical practice and for no legitimate medical purpose.

It was further part of said conspiracy that MILDRED PERKINS and DIANE NORMAN organized and/or hired the following individuals to perform the following tasks:

A. ROBERT J. SILLERY, M.D., ROBERT L. ALEXANDER, M.D., and AUGUSTINE KAYODE KOLE-JAMES, M.D.; and George M. Shargel, M.D., Ernest T. Marshall, M.D., and Chikwendu Amechi, M.D., to write and/or sign prescriptions for controlled substances using their respective DEA registrant numbers, said prescriptions being written and/or signed by SILLERY, ALEXANDER,

KOLE-JAMES, and Shargel, Marshall, and Amechi for alleged weight loss "patients" whom they had not examined or otherwise provided medical treatment for, thereby dispensing controlled substances outside of the scope of legitimate medical practice and for no legitimate medical purpose.

B. ARTHURDELLER DORRIS to act as nurse, receptionist and/or prescription verifier for the improperly written prescriptions of Doctors SILLERY, ALEXANDER, and KOLE-JAMES, and of Doctors Shargel, Marshall and Amechi.

C. TAMARA HAMPTON to act as nurse, receptionist and/or prescription verifier for the improperly written prescriptions of Doctors SILLERY, ALEXANDER, and KOLE-JAMES, and of Doctor Amechi.

D. VALERIE GRASTY to act as nurse, receptionist and/or prescription verifier for the improperly written prescriptions of Doctor ALEXANDER, and of Doctors Shargel and Marshall.

It was further part of said conspiracy that MILDRED PERKINS and ARTHURDELLER DORRIS wrote prescriptions for controlled substances and forged the signature of Roy Hazen, M.D.

It was further part of said conspiracy that MILDRED PERKINS and CHARISSA CLEMONS wrote prescriptions for controlled substances and forged the signatures of Robert Jampel, M.D., and Robert Frank, M.D.

It was further part of said conspiracy that DIANE NORMAN forged the signature of J.M. Siero, M.D., on prescriptions for controlled substances.

It was further part of said conspiracy that MILDRED PERKINS, DIANE NORMAN, ARTHURDELLER DORRIS, TAMARA HAMPTON, and VALERIE GRASYT illegally sold and aided and abetted each other in the illegal sale of prescriptions illegally written by Doctors ROBERT J. SILLERY, ROBERT E. ALEXANDER, and AUGUSTINE KAYODE KOLE-JAMES, as well as those illegally written by Ernest G. Marshall, M.D., Chikwendu Amechi, M.D., and George M. Shargel, M.D., to CHARISSA CLEMONS, Ron Frazier, Albert Denard, Heidi Malesky, Special Agent [REDACTED] Special Agent [REDACTED] Police Officer [REDACTED] Police Officer [REDACTED] Brian Chase, Special Agent [REDACTED] and other alleged "patients", some of said prescriptions eventually being redeemed at Detroit area pharmacies in the following dosage units and bearing the following doctors' signatures:

<u>DRUG</u>	<u>DOSAGE UNITS</u>	<u>DOCTOR</u>
Desoxyn	22,410	Sillery
	8,490	Alexander
	2,310	Amechi
	1,710	Kole-James
	5,640	Shargel
	23,895	Marshall
Preludin	1,260	Alexander
	90	Amechi
	930	Sillery
	11,460	Shargel
	4,710	Marshall
Percodan/Percocet	2,260	Alexander
	1,740	Amechi
	2,310	Kole-James
	16,790	Sillery
	500	Marshall



Methaqualone/Mequin/ Parest	90 1,050 210 10,350 200	Alexander Amechi Kole-James Sillery Marshall
Valium	4,470 360 150 10,860 3,120 1,290	Alexander Amechi Kole-James Marshall Sillery Shargel
Talwin	3,200 2,150 150 4,530	Alexander Amechi Kole-James Sillery
Tussionex/Hycodan	446 8 24 430 14 238	Alexander Amechi Kole-James Marshall Shargel Sillery
Tuinal	160 270 1,080 5,970	Alexander Amechi Kole-James Sillery
Empirin #4 With Codeine	60 600	Amechi Sillery
Tylenol #4 With Codeine	58 390 40 450	Alexander Amechi Marshall Sillery
Doriden	60 630	Kole-James Sillery

It was further part of said conspiracy that each prescription was sold to "patients" for \$15 and that no refunds were allowed.

It was further part of said conspiracy that DIANE NORMAN and MILDRED PERKINS held a "Christmas Special" in or about November, 1981, wherein two prescriptions could be purchased for \$25.00.

It was further part of said conspiracy that VALERIE J. GRASTY, ARTHURDELLER DORRIS and TAMARA HAMPTON altered heights, weights, and blood pressure readings of "patients" on patient Registration Forms For Obesity.

It was further part of said conspiracy that "patients" were instructed to complete Registration Forms For Obesity in false names.

It was further part of said conspiracy that MILDRED PERKINS maintained a daily quota for the number of Percodan prescriptions that she could sell.

It was further part of the conspiracy that MILDRED PERKINS instructed ARTHURDELLER DORRIS as to whom to sell prescriptions.

It was further part of said conspiracy that ARTHURDELLER DORRIS and TAMARA HAMPTON verified fraudulent prescriptions.

It was further part of said conspiracy that MILDRED PERKINS and DIANE NORMAN attempted to open a new clinic and employ ROBERT L. ALEXANDER, M.D., and AUGUSTINE KAYODE KOLE-JAMES, M.D., as physicians.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

(21 U.S.C. §841(a)(1); 18 U.S.C. §2  
DISTRIBUTION OF PRELUDIN; AIDING AND ABETTING)

That on or about January 20, 1982, in the Eastern District of Michigan, VALERIE J. GRASTY, defendant herein, did knowingly, intentionally and unlawfully aid and abet Ernest T. Marshall, M.D., in the distribution to Special Agent [REDACTED], of thirty dosage units of Preludin, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering a prescription for that drug which she knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 Code of Federal Regulations, Section 1306.04(a), 18 U.S.C. §2.

COUNT THREE

(21 U.S.C. §841(a)(1); 18 U.S.C. §2  
DISTRIBUTION OF VALIUM; AIDING AND ABETTING)

That on or about January 20, 1982, in the Eastern District of Michigan, Southern Division, VALERIE J. GRASTY, defendant herein, did knowingly, intentionally and unlawfully aid and abet Ernest T. Marshall, M.D., in the distribution to Special Agent [REDACTED], of thirty dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering a prescription for that drug which she knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 Code of Federal Regulations, Section 1306.04(a), 18 U.S.C. §2.

COUNT FOUR

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF DESOXYN; AIDING AND ABETTING)

That on or about February 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., and ARTHURDELLER DORRIS, defendants herein, did knowingly, intentionally, and unlawfully distribute thirty dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, to Special Agent [REDACTED] by delivering a prescription for that drug which they knew was not issued in the usual course of medical practice for a legitimate medical purpose, all in violation of Section 841(a)(1), Title 21, United States Code, 21 Code of Federal Regulations (CFR), Section 1306.04(a), 18 U.S.C. §2.

COUNT FIVE

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF VALIUM; AIDING AND ABETTING)

That on or about February 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., and ARTHURDELLER DORRIS, defendants herein, did knowingly, intentionally, and unlawfully distribute sixty dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, to Special Agent [REDACTED], by delivering two prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT SIX

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF PRELUDIN; AIDING AND ABETTING)

That on or about February 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., and ARTHURDELLER DORRIS, defendants herein, did knowingly, intentionally, and unlawfully distribute thirty dosage units of Preludin, a Schedule II Non-Narcotic Drug Controlled Substance, to Special Agent [REDACTED], by delivering a prescription for that drug which they knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT SEVEN

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF PRELUDIN)

That on or about February 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute thirty dosage units of Preludin, a Schedule II Non-Narcotic Drug Controlled Substance, to Special Agent [REDACTED], by delivering a prescription for that drug which he knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT EIGHT

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF VALIUM)

That on or about February 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute sixty dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, to Special Agent [REDACTED] by delivering two prescriptions for that drug which he knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT NINE

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF DESOXYN)

That on or about February 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute thirty dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, to Special Agent [REDACTED], by delivering a prescription for that drug which he knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT TEN

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF DESOXYN)

That on or about March 29, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute thirty dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, to Agent [REDACTED] by delivering a prescription for that drug which he knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT ELEVEN

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF VALIUM)

That on or about March 29, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute to Agent [REDACTED] thirty dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering a prescription for that drug which he knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT TWELVE

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF PRELUDIN; AIDING AND ABETTING)

That on or about April 22, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., and MILDRED PERKINS, defendants herein, did knowingly, intentionally, and unlawfully distribute to Special Agent [REDACTED] 180 dosage units of Preludin, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering six prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT THIRTEEN

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF DESOXYN)

That on or about April 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute to Police Officer [REDACTED] thirty dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering one prescription for that drug which he knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).



COUNT FOURTEEN

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF VALIUM)

That on or about April 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute to Police Officer [REDACTED] thirty dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering a prescription for that drug which he knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT FIFTEEN

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF VALIUM; AIDING AND ABETTING)

That on or about April 22, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., and MILDRED PERKINS, defendants herein, did knowingly, intentionally, and unlawfully distribute to Special Agent [REDACTED] 180 dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering six prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT SIXTEEN

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF PERCODAN; AIDING AND ABETTING)

That on or about April 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., MILDRED PERKINS and DIANE NORMAN did knowingly, intentionally, and unlawfully distribute to Special Agent [REDACTED] 240 dosage units of Percodan, a Schedule II Narcotic Drug Controlled Substance, by delivering six prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT SEVENTEEN

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF VALIUM; AIDING AND ABETTING)

That on or about April 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT L. ALEXANDER, M.D., MILDRED PERKINS and DIANE NORMAN, defendants herein, did knowingly, intentionally, and unlawfully distribute to Special Agent [REDACTED] 180 dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering six prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT EIGHTEEN

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF DESOXYN; AIDING AND ABETTING)

That on or about June 3, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., MILDRED PERKINS and DIANE NORMAN, defendants herein, did knowingly, intentionally, and unlawfully distribute to Police Officer [REDACTED] 60 dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT NINETEEN

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF VALIUM; AIDING AND ABETTING)

That on or about June 3, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., MILDRED PERKINS and DIANE NORMAN, defendants herein, did knowingly, intentionally, and unlawfully distribute to Police Officer [REDACTED] 60 dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF DESOXYN; AIDING AND ABETTING)

That on or about June 4, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., MILDRED PERKINS and DIANE NORMAN, defendants herein, did knowingly, intentionally, and unlawfully distribute to Police Officer [REDACTED] 60 dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-ONE

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF VALIUM; AIDING AND ABETTING)

That on or about June 4, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., MILDRED PERKINS and DIANE NORMAN, defendants herein, did knowingly, intentionally, and unlawfully distribute to Police Officer [REDACTED] 60 dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-TWO

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF PERCODAN; AIDING AND ABETTING)

That on or about June 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., and MILDRED PERKINS, defendants herein, did knowingly, intentionally, and unlawfully distribute to Special Agent [REDACTED] 30 dosage units of Percodan, a Schedule II Narcotic Drug Controlled Substance, by delivering a prescription for that drug which they knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-THREE

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF DESOXYN; AIDING AND ABETTING)

That on or about June 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., and MILDRED PERKINS, defendants herein, did knowingly, intentionally, and unlawfully distribute to Special Agent [REDACTED] 60 dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-FOUR

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF PERCODAN; AIDING AND ABETTING)

That on or about June 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., and MILDRED PERKINS, defendants herein, did knowingly, intentionally, and unlawfully distribute to Brian Chase 30 dosage units of Percodan, a Schedule II Narcotic Drug Controlled Substance, by delivering a prescription for that drug which they knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-FIVE

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF DESOXYN; AIDING AND ABETTING)

That on or about June 23, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., and MILDRED PERKINS, defendants herein, did knowingly, intentionally, and unlawfully distribute to Brian Chase 30 dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering a prescription for that drug which they knew was not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-SIX

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF PERCODAN; AIDING AND ABETTING)

That on or about June 25, 1982, in the Eastern District  
of Michigan, Southern Division, ROBERT J. SILLERY, M.D., and  
MILDRED PERKINS, defendants herein, did knowingly, intention-  
ally, and unlawfully distribute to Special Agent [REDACTED]  
[REDACTED] thirty dosage units of Percodan, a Schedule II  
Narcotic Drug Controlled Substance, by delivering a prescrip-  
tion for that drug which they knew was not issued in the  
usual course of medical practice for a legitimate medical  
purpose. All in violation of Section 841(a)(1), Title 21,  
United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-SEVEN

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF PERCODAN; AIDING AND ABETTING)

That on or about July 1, 1982, in the Eastern District  
of Michigan, Southern Division, ROBERT J. SILLERY, M.D., and  
DIANE NORMAN, defendants herein, did knowingly, intention-  
ally, and unlawfully distribute to Special Agent [REDACTED]  
[REDACTED] 450 dosage units of Percodan, a Schedule II Nar-  
cotic Drug Controlled Substance, by delivering 15 prescrip-  
tions for that drug which they knew were not issued in the  
usual course of medical practice for a legitimate medical  
purpose. All in violation of Section 841(a)(1), Title 21,  
United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-EIGHT

(21 U.S.C. §841(a)(1) and 18 U.S.C. §2  
DISTRIBUTION OF DESOXYN; AIDING AND ABETTING)

That on or about July 1, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., and DIANE NORMAN, defendants herein, did knowingly, intentionally, and unlawfully distribute to Special Agent [REDACTED] [REDACTED] 450 dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering 15 prescriptions for that drug which they knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a), 18 U.S.C. §2.

COUNT TWENTY-NINE

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF PERCODAN)

That on or about July 1, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., defendant herein, did knowingly, intentionally, and unlawfully distribute to Brian Chase 60 dosage units of Percodan, a Schedule II Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which he knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT THIRTY

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF DESOXYN)

That on or about July 1, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., de-



fendant herein, did knowingly, intentionally, and unlawfully distribute to Brian Chase 60 dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which he knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT THIRTY-ONE

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF DESOXYN)

That on or about August 12, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., defendant herein, did knowingly, intentionally, and unlawfully dispense and distribute to Police Officer [REDACTED] 60 dosage units of Desoxyn, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering two prescriptions for that drug which he knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT THIRTY-TWO

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF PRELUDIN)

That on or about August 12, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., defendant herein, did knowingly, intentionally, and unlawfully dispense and distribute to Police Officer [REDACTED] [REDACTED] 60 dosage units of Preludin, a Schedule II Non-Narcotic Drug Controlled Substance, by delivering two pre-

scriptions for that drug which he knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT THIRTY-THREE

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF VALIUM)

That on or about August 12, 1982, in the Eastern District of Michigan, Southern Division, ROBERT J. SILLERY, M.D., defendant herein, did knowingly, intentionally, and unlawfully dispense and distribute 120 dosage units of Valium, a Schedule IV Non-Narcotic Drug Controlled Substance, by delivering four prescriptions for that drug which he knew were not issued in the usual course of medical practice for a legitimate medical purpose. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR, Section 1306.04(a).

COUNT THIRTY-FOUR

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF DILAUDID)

That on or about December 29, 1982, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 300 dosage units of Dilaudid, a Schedule II Narcotic Drug Controlled Substance by delivering three prescriptions for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in

violation of Section 841(a)(1), Title 21, United States Code,  
21 CFR 1306.04(a).

COUNT THIRTY-FIVE

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about December 29, 1982, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering three prescriptions for Dilaudid in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT THIRTY-SIX

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF PERCODAN)

That on or about December 29, 1982, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 100 dosage units of Percodan, a Schedule II Non-Narcotic Drug Controlled Substance by delivering a prescription for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).

COUNT THIRTY-SEVEN

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about December 29, 1982, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering a prescription for Percodan in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT THIRTY-EIGHT

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF DILAUDID)

That on or about January 10, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 60 dosage units of Dilaudid, a Schedule II Narcotic Drug Controlled Substance by delivering a prescription for that drug wherein she forged the signature of J.M. Siero, J.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).

COUNT THIRTY-NINE

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about January 10, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering a prescription for Dilaudid in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT FORTY

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF DILAUDID)

That on or about January 12, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 100 dosage units of Dilaudid, a Schedule II Narcotic Drug Controlled Substance by delivering a prescription for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).

COUNT FORTY-ONE

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about January 12, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering a prescription for Dilaudid in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT FORTY-TWO

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF RITALIN)

That on or about January 15, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 200 dosage units of Ritalin, a Schedule II Non-Narcotic Drug Controlled Substance by delivering two prescriptions for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).

COUNT FORTY-THREE

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about January 15, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering two prescriptions for Ritalin in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT FORTY-FOUR

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF PERCODAN)

That on or about January 18, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 100 dosage units of Percodan, a Schedule II Non-Narcotic Drug Controlled Substance by delivering a prescription for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).

COUNT FORTY-FIVE

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about January 18, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering a prescription for Percodan in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT FORTY-SIX

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF DILAUDID)

That on or about January 19, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 100 dosage units of Dilaudid, a Schedule II Narcotic Drug Controlled Substance by delivering a prescription for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).



COUNT FORTY-SEVEN

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about January 19, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering a prescription for Dilaudid in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT FORTY-EIGHT

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF RITALIN)

That on or about January 19, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 400 dosage units of Ritalin, a Schedule II Non-Narcotic Drug Controlled Substance by delivering four prescriptions for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).

COUNT FORTY-NINE

(21 U.S.C. §843(a)(2) -- USE OF A DEA  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about January 19, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully use in the course of the distribution of a controlled substance a registration number that was fictitious, revoked, suspended, or issued to another person, by delivering four prescriptions for Ritalin in the name and DEA Registrant Number of J.M. Siero, M.D., when the defendant well knew that she was without authority to use the DEA Registrant Number or forge the signature of Dr. Siero on the prescriptions. All in violation of Section 843(a)(2), Title 21, United States Code.

COUNT FIFTY

(21 U.S.C. §841(a)(1)  
DISTRIBUTION OF RITALIN)

That on or about January 20, 1983, in the Eastern District of Michigan, Southern Division, DIANE NORMAN, defendant herein, did knowingly, intentionally and unlawfully distribute 100 dosage units of Ritalin, a Schedule II Non-Narcotic Drug Controlled Substance by delivering a prescription for that drug wherein she forged the signature of J.M. Siero, M.D. This unlawful distribution by DIANE NORMAN, defendant herein, who was not a licensed medical practitioner, was unauthorized by law or regulation. All in violation of Section 841(a)(1), Title 21, United States Code, 21 CFR 1306.04(a).

FOUNDED FIFTY-ONE

U.S.C. (a)(2) - USE OF  
REGISTRATION NUMBER ISSUED TO ANOTHER PERSON)

That on or about January 20, 1983, in the Eastern  
District of Michigan, Southern Division, J. E. NORMAN,  
defendant herein, did knowingly, intentionally and unlawfully  
use in the course of the distribution of a controlled sub-  
stance a registration number that was fictitious, revoked,  
suspended, or issued to another person, by delivering a  
prescription for Ritalin in the name and DEA Registrant  
Number of J.M. Siero, M.D., when the defendant well knew that  
she was without authority to use the DEA Registrant Number or  
forge the signature of Dr. Siero on the prescriptions. All  
in violation of Section 843(a)(2), Title 21, United States Code.

THIS IS A TRUE BILL

\_\_\_\_\_  
FOR PERSON

ROY C. HAYES  
United States Attorney

YVONNE V. WATFORD (P32560)  
Assistant United States Attorney

LAWRENCE J. BUNTING (P27111)  
Assistant United States Attorney

Dated: