

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA

Criminal No. 06-

v.

**CERTIFICATION OF  
LAURIE TOTH**

ALBERT POET

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Laurie Toth, of full age, certifies as follows:

1. I am an employee of the Shore Laser Center (hereinafter referred to as "Shore") which is located in Manahawkin, New Jersey and have been employed there for approximately 18 years. I am making this Certification at the request of Dr. Albert Poet who is the owner of Shore and the defendant in this matter. I have knowledge of the facts that are stated herein.
2. I was initially hired by Shore as a Clinical Medical Assistant in 1989 and remained in that capacity until 2003. In 2003 I became the office manager. My present duties generally include the handling of insurance forms, billing the patients, paying most of the bills, answering the phone, doing the payroll and basically overseeing the office. I still act as a medical assistant for Dr. Poet when needed.
3. When I was the medical assistant, I would be responsible for bringing the patient to the back of the office prior to the doctor speaking to him or her. I would also assist the doctor during the administration of the treatment.
4. On July 18, 2006, I had met with Assistant United States Attorney Eugenia Cowles and Investigator Marc Hess at the United States Attorney's Office in Trenton, New Jersey. Also present was my attorney Robert G. Stevens. It is my understanding that Ms. Cowles had previously contacted Mr. Stevens and requested that he permit me to be interviewed regarding the investigation of Dr. Poet. I indicated that I would do so.
5. At the beginning of the interview, Ms. Cowles informed me that I was not a target of the investigation and was considered only to be a source of information as a

result of my employment at Shore. She also emphasized that it was important that I be truthful in my responses to her questions.

6. During the interview I was asked about my employment at Shore and my duties. I also described the operation of the office and named the other employees and their duties. Other topics included the maintaining of the office books and records, the bank accounts and advertising.
7. Aside from the general operations of Shore, I was specifically questioned about the use and the administering of Botox by Dr. Poet. I was also asked about the use of a similar product that was ordered from a company named TRI.
8. In response to these questions, I told Ms. Cowles that the office started using Botox around the year 2002, although I was not sure of the exact date. There was some advertising, but I believe that most people heard that Dr. Poet was using it and started making appointments for the treatment. There are no real "walk ins" for this type of treatment. I also received Botox treatments from Dr. Poet as have the rest of the office staff.
9. I also told Ms. Cowles that around the year 2004, Dr. Poet advised me that he was going to order a new product from a company named TRI. He indicated that this product was in the process of FDA approval and that it was more concentrated than the Botox that we were then using. I told Ms. Cowles that all of the office employees tried the new product when it arrived and that we generally felt that it worked better and lasted longer than Botox.
10. I explained that when the patient comes to the office, the medical assistant brings him or her to the back of the office to a treatment room. When Dr. Poet comes into the treatment room, he meets with the patient and explains in great detail the specifics of the particular procedure. This can often take a considerable amount of time, sometimes over a half an hour. He explains the side effects, the "down time" and the after care procedures. He then tells the assistant to get the appropriate consent form for the particular procedure which he then reviews with the patient. The medical assistant will witness the patient's signature on the consent form.
11. I told them that Dr. Poet made up the consent forms and that he updates them periodically. It is my belief that the same consent forms were used for the Botox product and for the TRI product.
12. I also indicated to Ms. Cowles that I do not recall any complaints about the TRI product except for a comment such as there may have been some movement and the patient requested a little more of the treatment. I emphasized that I felt the TRI product was better as it lasted longer and seemed to be more effective.
13. At the conclusion of the July 18, 2006 interview at the United States Attorney's Office, Ms. Cowles told me that I may receive a subpoena to testify before a

grand jury. If that occurred, I would be asked the same types of questions that I was asked in the interview but that it probably would not take as long as this initial interview.

14. I subsequently was served with a subpoena and did testify before a grand jury on August 10, 2006. The questions about the use of Botox and the TRI product were again asked before the grand jury. I provided the same responses as set forth above.

15. I certify under penalty of perjury that the foregoing statements are true and correct.

Dated: 1/9/07

  
Laurie Toth