

22

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,

Case: 2:21-cr-20575  
Judge: Edmunds, Nancy G.  
MJ: Patti, Anthony P.  
Filed: 09-09-2021 At 04:05 PM  
INDI USA VS LEAL, ET AL (DP)

D-1 VICTOR MANUEL RODRIGUEZ LEAL  
D-2 LUIS ALBERTO CICILA FERNANDEZ  
D-3 MICHAEL MORERA FERNANDEZ

VIO: 18 U.S.C. § 1349  
18 U.S.C. § 1347  
18 U.S.C. § 2  
18 U.S.C. § 1956(h)  
18 U.S.C. § 981  
18 U.S.C. § 982

Defendants.

\_\_\_\_\_/

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

**The Medicare Program**

1. The Medicare program ("Medicare") was a federal health care program providing benefits to persons who were 65 or older or disabled. Medicare was administered by the Centers for Medicare and Medicaid Services ("CMS"), a federal agency under the United States Department of Health and Human Services.

Individuals who received benefits under Medicare were referred to as Medicare “beneficiaries.”

2. Medicare was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b), and a “Federal health care program,” as defined by Title 42, United States Code, Section 1320a-7b(f).

3. Medicare covered different types of benefits and was separated into different program “parts.” “Part A” of the Medicare program covered certain eligible home health care costs for medical services provided by a home health agency (“HHA”), also referred to as a “provider,” to persons who already qualified for Medicare and who additionally required home health services because of an illness or disability that caused them to be homebound.

4. National Government Services, which is located outside the state of Michigan, was the CMS intermediary for Medicare Part A for the state of Michigan starting in or around May 2015. AdvanceMed was the Zone Program Integrity Contractor (“ZPIC”), meaning the Medicare contractor charged with investigating fraud, waste, and abuse.

5. By becoming a participating provider in Medicare, enrolled providers agreed to abide by the policies and procedures, rules, and regulations governing reimbursement. In order to receive Medicare funds, enrolled providers, together with their authorized agents, employees, and contractors, were required to abide by all

the provisions of the Social Security Act, the regulations promulgated under the Act, and applicable policies, procedures, rules, and regulations issued by CMS and its authorized agents and contractors.

6. Upon certification, the medical provider, whether a clinic, a HHA, or an individual, was assigned a provider identification number for billing purposes (referred to as an "NPI"). When the medical provider rendered a service, the provider submitted a claim for reimbursement to the Medicare contractor/carrier through interstate wire transmission that included the NPI assigned to that medical provider.

7. In order to receive reimbursement for a covered service from Medicare, a provider was required to submit a claim, either electronically or using a form (e.g., a CMS-1500 form or UB-92) containing the required information appropriately identifying the provider, beneficiary, and services rendered.

8. Health care providers were given, and provided with online access to, Medicare manuals and services bulletins describing proper billing procedures and billing rules and regulations. Providers could only submit claims to Medicare for services they rendered, and providers were required to maintain patient records to verify that the services were provided as described on the claim form.

9. Medicare only covered services that were both medically necessary and rendered.

10. Medicare only covered home health services, if, on the claimed dates of service:

a. the Medicare beneficiary was under the care of a doctor and received services under a plan of care established and reviewed regularly by a doctor;

b. the Medicare beneficiary needed, and a doctor certified that the beneficiary needed, one or more of the following: (i) Intermittent skilled nursing care; (ii) Physical therapy; (iii) Speech-language pathology services; or (iv) Continued occupational therapy;

c. the HHA must have been approved by Medicare (Medicare-certified); and

d. the Medicare beneficiary was homebound, and a doctor certified that the Medicare beneficiary was homebound.

11. Medicare rules allowed HHAs to submit requests for advance payments (“RAPs”) at the start of a beneficiary’s care. Providers could receive up to 60% of the total claim amount, pursuant to a RAP request, at the beginning of an episode of care. At the conclusion of the episode of care, a final claim must have been submitted in order for the provider to receive the remainder of the Medicare reimbursement for each claim.

### **The Related Home Health Agency**

12. Tri-County Homecare, LLC (“Tri-County”) was a Michigan limited liability company doing business at 30700 Telegraph Road, Suite 1540, Bingham Farms, Michigan 48025. Tri-County was enrolled as a participating Medicare provider and submitted claims to Medicare. Tri-County was a HHA that purportedly provided in-home physical therapy, occupational therapy, speech pathology, and/or skilled nursing services to beneficiaries and other individuals.

### **The Defendants and Related Entities**

13. VICTOR MANUEL RODRIGUEZ LEAL (“RODRIGUEZ”) was a resident of Florida. RODRIGUEZ was the controller, operator, and owner of Tri-County, which conducted business throughout the Eastern District of Michigan. According to Medicare enrollment and other corporate documentation, RODRIGUEZ assumed ownership of Tri-County in or around February 2017.

14. LUIS ALBERTO CICILIA FERNANDEZ (“CICILIA”) was a resident of Florida. CICILIA was a banking signatory of Tri-County which conducted business throughout the Eastern District of Michigan. CICILIA was also the controller, operator, owner, and banking signatory of several corporate entities that engaged in financial transactions with Tri-County.

15. MICHAEL MORERA FERNANDEZ (“MORERA”) was a resident of Florida. MORERA was the controller, operator, owner, and banking signatory of several corporate entities that engaged in financial transactions with Tri-County.

16. All Drive Ways and Seawall Deck Corp. (“All Drive”) was a Florida corporation formed in or around March 2018. All Drive was owned and controlled by MORERA and others known and unknown to the Grand Jury and operated for the benefit of MORERA, CICILIA, RODRIGUEZ, and others known and unknown to the Grand Jury.

17. Bonjour Garden and Tree Services, Inc. (“Bonjour”) was a Florida corporation that was formed in or around February 2018. Bonjour was owned and controlled by CICILIA and others known and unknown to the Grand Jury and operated for the benefit of CICILIA, MORERA, RODRIGUEZ, and others known and unknown to the Grand Jury.

18. Dow Chemical Solutions, LLC (“Dow”) was a Florida limited liability company that was formed in or around November 2016. Dow was owned and controlled by RODRIGUEZ and others known and unknown to the Grand Jury and operated for the benefit of RODRIGUEZ, CICILIA, MORERA, and others known and unknown to the Grand Jury.

19. Horizon Carpentry & Wood Finish, Inc. (“Horizon”) was a Florida corporation that was formed in or around March 2018. Horizon was owned and controlled by MORERA and others known and unknown to the Grand Jury, and operated for the benefit of MORERA, CICILIA, RODRIGUEZ, and others known and unknown to the Grand Jury.

20. LAC Transportation and Truck Care Corp. ("LAC") was a Florida corporation that was formed in or around January 2018. LAC was owned and controlled by CICALIA and others known and unknown to the Grand Jury and operated for the benefit of CICALIA, MORERA, RODRIGUEZ, and others known and unknown to the Grand Jury.

21. South of Faul Fundicion Concrete, Inc. ("South of Faul") was a Florida corporation that was formed in or around March 2018. South of Faul was owned and controlled by CICALIA and others known and unknown to the Grand Jury and operated for the benefit of CICALIA, MORERA, RODRIGUEZ, and others known and unknown to the Grand Jury.

22. Tosp Staffing Training Corp. ("Tosp") was a Florida corporation formed in or around November 2016. Tosp was owned and controlled by RODRIGUEZ, CICALIA, and others known and unknown to the Grand Jury and operated for the benefit of RODRIGUEZ, CICALIA, MORERA, and others known and unknown to the Grand Jury.

23. Total Lawn Palm Gardens Design, Inc. ("Total Lawn") was a Florida corporation formed in or around March 2018. Total Lawn was owned and controlled by MORERA and others known and unknown to the Grand Jury and operated for the benefit of MORERA, CICALIA, RODRIGUEZ, and others known and unknown to the Grand Jury.

24. USA VMR Management, LLC (“USA VMR”) was a Florida limited liability company that was formed in or around November 2016. USA VMR was owned and controlled by RODRIGUEZ, CICALIA, and others known and unknown to the Grand Jury and operated for the benefit of RODRIGUEZ, CICALIA, MORERA, and others known and unknown to the Grand Jury.

25. Viacon Tech and Design Corp. (“Viacon”) was a Florida corporation formed in or around February 2018. Viacon was owned and controlled by CICALIA and others known and unknown to the Grand Jury and operated for the benefit of CICALIA, RODRIGUEZ, MORERA, and others known and unknown to the Grand Jury.

26. VMR Ventures, LLC (“VMR”) was a Florida limited liability company formed in or around March 2018. VMR was owned and controlled by RODRIGUEZ, MORERA, and others known and unknown to the Grand Jury and operated for the benefit of RODRIGUEZ, MORERA, CICALIA, and others known and unknown to the Grand Jury.

27. LC Multiservices Construction Corp. (“LC”) was a Florida corporation formed in or around March 2018. LC was owned and controlled by CICALIA and others known and unknown to the Grand Jury and operated for the benefit of CICALIA, MORERA, RODRIGUEZ, and others known and unknown to the Grand Jury.

28. Whole Marine and Installations Life Corp. (“Whole Marine”) was a Florida corporation formed in or around March 2018. Whole Marine was owned and controlled by CICILIA and others known and unknown to the Grand Jury and operated for the benefit of CICILIA, MORERA, RODRIGUEZ, and others known and unknown to the Grand Jury.

**COUNT 1**  
**Conspiracy to Commit Health Care Fraud and Wire Fraud**  
**(18 U.S.C. § 1349)**

**D-1 VICTOR MANUEL RODRIGUEZ LEAL**

29. Paragraphs 1 through 28 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

30. From in or around November 2016, and continuing through in or around June 2018, in Oakland County, in the Eastern District of Michigan, and elsewhere, VICTOR MANUEL RODRIGUEZ LEAL did knowingly and willfully combine, conspire, confederate, and agree with others, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

- a. to violate Title 18, United States Code, Section 1347, that is, to execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and

under the custody and control of, Medicare, in connection with the delivery of and payment for health care benefits, items, and services.

b. to violate Title 18, United States Code, Section 1343, that is, to knowingly and with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice.

### **Purpose of the Conspiracy**

31. It was the purpose of the conspiracy for the defendant VICTOR MANUEL RODRIGUEZ LEAL and his co-conspirators to unjustly enrich themselves by, among other things: (a) submitting and causing the submission of false and fraudulent claims to Medicare for home health services that were not provided as represented; (b) concealing the submission of false and fraudulent claims to Medicare and the receipt and transfer of proceeds from the fraud; and (c) diverting fraud proceeds for the personal use and benefit of the defendant and his co-conspirators.

### **Manner and Means**

32. The manner and means by which the defendant VICTOR MANUEL RODRIGUEZ LEAL and his co-conspirators sought to accomplish the purpose of the conspiracy included, among other things, the following:

33. RODRIGUEZ and his co-conspirators purchased and obtained control over Tri-County in or around February 2017.

34. In or around February 2017, RODRIGUEZ became the sole signatory on the primary bank accounts for Tri-County, Bank-1 accounts ending in x9769, x9915 and x2109.

35. RODRIGUEZ and his co-conspirators obtained the names and numbers of Medicare beneficiaries and NPIs of physicians in order to submit false and fraudulent claims for home health services through Tri-County.

36. RODRIGUEZ and his co-conspirators submitted and caused Tri-County to submit false and fraudulent claims to Medicare for home health services purportedly rendered to Medicare beneficiaries, when in truth and in fact, such home health services were not medically necessary and were not provided.

37. In submitting and causing the submission of these claims, RODRIGUEZ falsely and fraudulently certified that the home health services were purportedly prescribed by a licensed physician and that they were provided to Medicare beneficiaries under Tri-County's care.

38. As a result of these false and fraudulent claims, Medicare made payments to Tri-County in an amount in excess of \$7 million.

**COUNTS 2-5**  
**Health Care Fraud**  
**(18 U.S.C. §§ 1347 and 2)**

**D-1 VICTOR MANUEL RODRIGUEZ LEAL**

39. Paragraphs 1 through 28 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

40. From in or around November 2016, and continuing through in or around June 2018, in Oakland County, in the Eastern District of Michigan, and elsewhere, VICTOR MANUEL RODRIGUEZ LEAL, in connection with the delivery of, and payment for, health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud Medicare, a health care benefit program as defined in 18 U.S.C. § 24(b), and to obtain by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of Medicare, that is, by submitting and causing the submission of false and fraudulent claims to Medicare for home health care services that were not provided as represented.

**Purpose of the Scheme and Artifice**

41. The Grand Jury realleges and incorporates by reference Paragraph 31 of this Indictment as a description of the purpose of the scheme and artifice.

### **The Scheme and Artifice**

42. The Grand Jury realleges and incorporates by reference Paragraphs 32 through 38 of this Indictment as a description of the scheme and artifice.

### **Acts in Execution of the Scheme and Artifice**

43. On or about the dates specified below, in the Eastern District of Michigan, and elsewhere, VICTOR MANUEL RODRIGUEZ LEAL, aided and abetted by others, and aiding and abetting others known and unknown to the Grand Jury, submitted and caused to be submitted the following false and fraudulent claims to Medicare for payment for home health services that were not provided, as described in Paragraphs 31 through 38 of this Indictment, with each execution set forth below forming a separate count:

Count	Medicare Beneficiary	Approximate Date of Claim Submission	Claimed Start Date of Service	Approx. Amount Paid by Medicare
2	G.R.	February 12, 2018	April 25, 2017	\$2,048.02
3	S.M.	February 28, 2018	June 26, 2017	\$2,378.31
4	J.S.	March 12, 2018	August 27, 2017	\$2,054.24

5	C.T.	March 12, 2018	August 28, 2017	\$1,879.06
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Each in violation of Title 18, United States Code, Sections 1347 and 2.

**COUNT 6**  
**Conspiracy to Launder Monetary Instruments**  
**(18 U.S.C. § 1956(h))**

**AGAINST ALL DEFENDANTS**

44. Paragraphs 1 through 28 and 31 through 38 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

45. From in or around November 2016, and continuing through in or around June 2018, the exact dates being unknown to the Grand Jury, in the Eastern District of Michigan, and elsewhere, VICTOR MANUEL RODRIGUEZ LEAL, LUIS ALBERTO CICILIA FERNANDEZ, and MICHAEL MORERA FERNANDEZ did willfully and knowingly combine, conspire, confederate, and agree with each other and others, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

a. to conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, health care fraud, a violation of Title 18, United States Code, Section 1347, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location,

source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

b. to knowingly engage and attempt to engage in monetary transactions by, through, or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, and such property having been derived from a specified unlawful activity, that is, health care fraud, a violation of Title 18, United States Code, Section 1347, in violation of Title 18, United States Code, Section 1957.

#### **Manner and Means**

46. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

47. Beginning in or around November 2016, RODRIGUEZ created and caused to be created Dow, Tosp, VMR, and USA VMR as entities in which he was an officer and otherwise controlled. Thereafter, RODRIGUEZ added CICILIA as an officer and registered agent of Dow, Tosp, VMR, and USA VMR.

48. RODRIGUEZ and CICILIA opened bank accounts on behalf of Dow, Tosp, and USA VMR, for which he was a signatory, for the purpose of receiving

money and property from Tri-County that was falsely and fraudulently obtained from Medicare as described in Paragraphs 31 through 38 herein.

49. Beginning in or around November 2017, RODRIGUEZ added CICILIA as a signatory on Tri-County's business bank accounts which received money and property fraudulently obtained from Medicare, as described in Paragraphs 31 through 38 herein, so that CICILIA could conduct financial transactions greater than \$10,000, affecting interstate commerce, and which were designed to disguise the nature, location, source, ownership, and control of the fraudulently obtained proceeds.

50. Beginning in or around January 2018, CICILIA created and caused to be created Bonjour, LAC, South of Faul, Tosp, LC, and Whole Marine as entities in which he was an officer and otherwise controlled.

51. CICILIA also opened bank accounts on behalf of Bonjour, LAC, South of Faul, Tosp, LC, and Whole Marine for the purpose of receiving money and property from Tri-County that was falsely and fraudulently obtained from Medicare, as described in Paragraphs 31 through 38 herein, and conducting financial transactions greater than \$10,000, affecting interstate commerce, and which were designed to disguise the nature, location, source, ownership, and control of the fraudulently obtained proceeds.

52. In or around March 2018, MORERA created and caused to be created All Drive, Horizon, and Total Lawn as entities in which he was an officer and otherwise controlled.

53. MORERA also opened bank accounts on behalf of All Drive, Horizon, and Total Lawn for the purpose of receiving money and property from Tri-County that was falsely and fraudulently obtained from Medicare, as described in Paragraphs 31 through 38 herein, and conducting financial transactions greater than \$10,000, affecting interstate commerce, and which were designed to disguise the nature, location, source ownership, and control of the fraudulently obtained proceeds.

54. Beginning in or around March 2018, CICALIA and MORERA engaged in a series of financial transactions whereby funds, in an amount exceeding \$5 million, that were fraudulently obtained from Medicare, as described in Paragraphs 31 through 38 herein, were transferred from Tri-County's bank accounts to bank accounts associated with All Drive, Bonjour, Dow, Horizon, LAC, South of Faul, Tosp, Total Lawn, USA VMR, Viacon, VMR, LC, and Whole Marine. These transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the fraudulently obtained proceeds.

55. Beginning in or around March 2018, CICALIA and MORERA engaged in a series of financial transactions in excess of \$10,000 whereby funds that were fraudulently obtained from Medicare, as described in Paragraphs 31 through 38

herein, were transferred from bank accounts associated with All Drive, Bonjour, Dow, Horizon, LAC, South of Faul, Tosp, Total Lawn, USA VMR, Viacon, VMR, LC, and Whole Marine to CICILIA and MORERA for their personal use and benefit.

a. As an example of such activity, on or about March 26, 2018, CICILIA issued a check to MORERA in the amount of \$35,000, representing funds fraudulently obtained from Medicare, as described in Paragraphs 31 through 38 herein, from a bank account associated with Bonjour which was deposited by MORERA into his personal bank account.

b. As a further example of such activity, on or about March 7, 2018, CICILIA transferred \$112,085.70 from Tri-County's business banking account, representing funds fraudulently obtained from Medicare, as described in Paragraphs 31 through 38 herein, to a personal bank account belonging to MORERA. On April 2, 2018, MORERA issued himself a cashier's check in the amount of \$43,261.95.

c. As a further example of such activity, in or around March 2018, CICILIA issued checks totaling \$489,107.15 from Tri-County's business banking account, representing funds fraudulently obtained from Medicare, as described in Paragraphs 31 through 38 herein, into a bank account associated with USA VMR. On or about March 16, 2018, CICILIA made a cash withdrawal in the amount of \$16,000 from this account.

All in violation of Title 18, United States Code, Section 1956(h).

**CRIMINAL FORFEITURE**

56. The above allegations contained in this Indictment are incorporated by reference as if set forth fully herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which VICTOR MANUEL RODRIGUEZ LEAL, LUIS ALBERTO CICILIA FERNANDEZ, and MICHAEL MORERA FERNANDEZ may have an interest, pursuant to 18 U.S.C. § 981, 18 U.S.C. § 982, and 28 U.S.C. § 2461.

57. Upon conviction of any violation of 18 U.S.C. §§ 1349 and 1347, as alleged in this Indictment, RODRIGUEZ, CICILIA, and MORERA shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from, gross proceeds traceable to the commission of such violation, pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(7), and 28 U.S.C. § 2461.

58. Upon conviction of a violation of 18 U.S.C. § 1956, as alleged in this Indictment, RODRIGUEZ, CICILIA, and MORERA shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property, pursuant to 18 U.S.C. § 981(a)(1)(A), 18 U.S.C. § 982(a)(1), and 28 U.S.C. § 2461.

59. *Money Judgment:* A sum of money equal to at least \$7.4 million in United States currency, or such amount as is proved at trial in this matter,

representing the total amount of gross proceeds obtained as a result of the defendants' violations, as alleged in this Indictment.

60. *Substitute Assets*: If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek to forfeit any other property of the defendants up to the value of the forfeitable property described above.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson  
Grand Jury Foreperson

SAIMA S. MOHSIN  
ACTING UNITED STATES ATTORNEY

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Acting Chief  
Criminal Division, Fraud Section  
U.S. Department of Justice

ALLAN J. MEDINA  
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s/ Patrick J. Suter  
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Dated: September 9, 2021

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. Victor Manuel Rodriguez Leal et. al.,

County where offense occurred : Oakland

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/\_\_\_ Information --- no prior complaint.  
☐ Indictment/\_\_\_ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### **Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 9, 2021  
Date



Patrick J. Suter, Trial Attorney  
 211 West Fort Street, Detroit, MI 48226  
 Phone: 202-262-7011  
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 Attorney Bar #: CA 242494

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.