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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Case No. 21CR2544 -BTM

v.

INFORMATION

ROSELIA KUBECK(1)
ROSARIO GONZALEZ(2)

Title 18, United States Code, Section 371 –
Conspiracy (misdemeanor)

Defendants.

The United States charges:

**COUNT 1
CONSPIRACY
18U.S.C. § 371**

Beginning in March 2020, within the Southern District of California and elsewhere, defendants ROSARIO GONZALEZ and ROSELIA KUBECK knowingly and intentionally conspired and agreed to commit a misdemeanor offense against the United States, that is, a violation of Title 42, United States Code, Section 1320a-7b(a)(1), and one or more persons did any act to effect the object of the conspiracy.


To effect the object of the conspiracy, Defendants completed requisition forms for Medicare patients that contained inaccurate diagnoses, and transmitted these to

laboratories, knowing and intending that the laboratories which performed the tests would submit inaccurate and medically unnecessary claims to Medicare based on the inaccurate diagnoses that the defendants put on the requisition forms.

All in violation of Title 18, United States Code, Section 371.

RANDY S. GROSSMAN
Acting United States Attorney

DATED: 9/7/2021


VALERIE H. CHU
Assistant U.S. Attorney