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**FORMER CHIEF EXECUTIVE OFFICER OF
ROCK CREEK PSYCHIATRIC HOSPITAL AND PHYSICIAN CHARGED IN BRIBERY
AND KICKBACK CONSPIRACY SUPERSEDING INDICTMENT**

CHICAGO – The former chief executive officer at the shuttered Rock Creek Center in Lemont, Illinois, and an associated physician today became the third and fourth individuals charged in an ongoing federal investigation relating to the privately-owned psychiatric facility that closed in 2002. The defendants, **Wendy Mamoon**, 48, of Sunnyvale, CA, the facility's former chief executive officer, and **Dr. Roland Borassi**, 53, of Burr Ridge, Illinois, a Rock Creek Contract Physician, were charged in a superseding indictment along with Rock Creek's previously charged Director of Operations, **Mahmood Baig**, with participating in an alleged bribery and kickback conspiracy that resulted in Rock Creek making illegal payments totaling more than \$565,000 to Dr. Borassi and his medical doctors' group, Integrated Health Center, S.C., located in Romeoville, Illinois. Mamoon, Baig and other Rock Creek officials allegedly directed bribe payments to Dr. Borassi and four individual physicians employed by him at Integrated in return for Dr. Borassi referring patients to Rock Creek, enabling the facility to obtain Medicare payments for those patients.

Baig, 55, of Woodridge, a licensed nutritionist, was previously charged in December, 2006, with one count of bribery conspiracy and six counts of paying bribes relating to a federal health care program in a criminal information filed in U.S. District Court.

According to the charges, Mamoon, Baig and a co-conspirator, Individual C, were responsible for making decisions regarding patient admissions and discharges and ensuring a high patient census at Rock Creek, which had approximately 120 patient beds. Mamoon, Baig and Borassi, allegedly participated in the bribery and kickback conspiracy along with Individual C, a member of Rock Creek's board of directors. The conspiracy count alleges that between 2000 and September 2002, Mamoon, Baig, Borassi, Individual C and others agreed that Rock Creek would pay bribes to Borassi, to Integrated and to Physicians A, B, C and D, for the benefit of Borassi and Integrated in return for Borassi's referral of patients to Rock Creek.

The charges further allege that Mamoon, Baig and Individual C caused Rock Creek to pay Borassi a total of \$222,000 over three years – \$53,000 in 2000, \$116,000 in 2001, and \$53,000 in 2002 – in bribes disguised as compensation for Borassi's purported employment at Rock Creek. In addition, Mamoon, Baig and Individual C allegedly caused Rock Creek to pay a total of more than \$280,000 to Physicians A, B, C and D between 2000 and 2002, purportedly as compensation for work they performed at Rock Creek, when, in fact, the payments were disguised bribes for the benefit of Borassi in return for patient referrals. Finally, beginning in early 2001, Mamoon, Baig and Individual C also allegedly caused Rock Creek to pay \$2,000 a month for Integrated's office lease and \$1,850 a month in salary for Integrated's secretary, knowing that these payments were not legitimate Rock Creek business expenses but were bribes to benefit Borassi and Integrated in return for patient referrals.

As part of the alleged conspiracy, Borassi, referred substantially more patients to Rock Creek after the agreement with Mamoon, Baig and Individual C than before the conspiracy began. Mamoon and Baig allegedly caused Rock Creek to submit reimbursement claims to Medicare for its physicians and Integrated's physicians who allegedly provided services to Rock Creek patients referred by Borassi, when, in fact, some of those services were not performed. Mamoon and Baig also routinely

caused Rock Creek to submit to Medicare reimbursement claims for the hospital stays of those patients, which, in fact, they knew were not medically necessary, the charges allege.

As part of the conspiracy, Borrasi caused Integrated to pay kickbacks to Baig totaling \$66,000 – \$30,000 in 2001, and \$36,000 in 2002 – to coordinate the admission of Borrasi’s referrals to Rock Creek and to ensure that Integrated’s physicians could maximize the Medicare reimbursement they received for medical services purportedly provided to those patients.

The government is being represented by Assistant U.S. Attorneys Joel Hammerman, Lisa Noller and Jeffrey Cramer.

If convicted, each count against Mamoon, Baig and Borrasi carries a maximum penalty of five years in prison and a \$250,000 fine. The Court, however, would determine the appropriate sentence to be imposed. All defendants will be ordered to appear for arraignment at a later date in U.S. District Court.

The public is reminded that an indictment contains only charges and is not evidence of guilt. The defendant is presumed innocent and is entitled to a fair trial at which the United States has the burden of proving guilt beyond a reasonable doubt.

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