

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 10-
 :
 ROBERTO CASTANON : 18 U.S.C. § 1349

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Conspiracy to Commit Mail Fraud
(18 U.S.C. § 1349)

1. At various times relevant to this Information, defendant Roberto Castanon ("defendant Castanon") resided in or near Rahway, New Jersey.
2. At all times material to this Information, Spinal Care & Rehabilitation Center, a/k/a "Rahway Rehabilitation Center" ("Spinal Care"), was a clinic located in Rahway, New Jersey that provided chiropractic services. Defendant Castanon was President and Owner of Spinal Care.
3. The majority of the patients of Spinal Care were receiving treatment under "no-fault" automobile insurance plans. Under New Jersey law, any individual who has a motor vehicle registered in New Jersey must obtain valid vehicle insurance coverage to drive that vehicle. This insurance coverage includes compulsory personal injury protection, meaning that if a claimant sustains an injury as a result of a motor vehicle collision, that individual's insurance carrier is required to pay necessary and reason-

able medical expenses arising from such injury, regardless of fault or liability.

The Conspiracy

4. From in or about January 2003 through in or about February 2007, in Union County, in the District of New Jersey, and elsewhere, defendant

ROBERTO CASTANON

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, which scheme and artifice was in substance and in part as set forth below, and for the purpose of executing such scheme and artifice, to cause to be placed in post offices and authorized depositories for mail matter, matters and things to be sent and delivered by the United States Postal Service, and to cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, contrary to Title 18, United States Code, Section 1341.

Object of the Conspiracy

5. The object of the conspiracy was for Spinal Care to obtain payment from insurance companies for purported services rendered for "patients" who had agreed to stage automobile accidents in order to submit fraudulent claims based on non-existent or exaggerated injuries.

Manner and Means of the Conspiracy

6. As part of the conspiracy, defendant Castanon and other coconspirators recruited individuals to participate in automobile accidents that were staged ("Accident Participant(s)"). Defendant Castanon then instructed Accident Participants to intentionally have one vehicle collide into another vehicle.

7. After the staged accident, an Accident Participant or another coconspirator would call law enforcement to the scene of the staged accident. At defendant Castanon's direction, Accident Participants would inform law enforcement that a car accident had occurred and would misrepresent the extent of their injuries to law enforcement in order for the injuries to be documented within the police report, a copy of which was later submitted to insurance companies. A police report would then be generated for the staged accident.

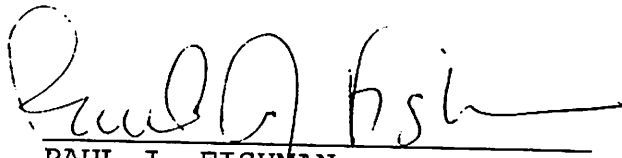
8. As further part of the conspiracy, defendant Castanon directed the Accident Participants to come to his clinic, Spinal Care, misrepresent to the treating chiropractor the extent of their injuries, and obtain "treatment" for their purported injuries. The Accident Participants would be paid a sum of money in cash by defendant Castanon or his coconspirators.

9. As further part of the conspiracy, defendant Castanon, by and through his company, Spinal Care, submitted invoices and medical documents by mail to several insurance companies for

chiropractic services to individuals that were involved in the staged accidents.

10. From in or about January 2003 through in or about February 2007, approximately \$687,416.30 in claims were submitted to insurance companies for "treatment" related to purported injuries resulting from staged accidents coordinated by defendant Castanon and his coconspirators.

In violation of Title 18, United States Code, Section 1349.

A handwritten signature in black ink, appearing to read "Paul J. Fishman", written over a horizontal line.

PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

**United States District Court
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UNITED STATES OF AMERICA

v.

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INFORMATION FOR

18 U.S.C. § 1349

PAUL J. FISHMAN
U.S. ATTORNEY
NEWARK, NEW JERSEY

GRACE H. PARK
ASSISTANT U.S. ATTORNEY
973-645-2718
