

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SEALED
 : INFORMATION

-v.- : 12 Cr. __ (WHP)

JEFFREY SQUITIERI, :

Defendant.

12 CRIM 1027

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COUNT ONE

The United States Attorney charges:

1. From at least in or about January 2011, up to and including at least in or about July 2011, in the Southern District of New York and elsewhere, JEFFREY SQUITIERI, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 1347 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that JEFFREY SQUITIERI, the defendant, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud a health care benefit program and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care

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benefit program, in connection with the delivery of and payment for health care benefits, items and services, which violation would result in serious bodily injury.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about January 25, 2011, JEFFREY SQUITIERI, the defendant, advised undercover agents posing as car accident victims to receive unnecessary medical treatment to increase the monetary value of their insurance claims.

b. On or about June 7, 2011, JEFFREY SQUITIERI, the defendant, caused to be mailed a document claiming fraudulent medical claims on behalf of one of the undercover agents.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

4. As the result of committing the offense described in Count One, in violation of Title 18, United States Code, Sections 1349, JEFFREY SQUITIERI, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(7) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to a sum in United States currency

representing the amount of proceeds obtained as a result of the offense.

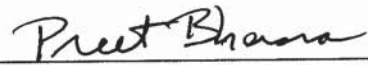
Substitute Asset Provision

5. If any of the above-described forfeitable property, 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 person;
- 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 which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 1347, 1349, 2, 982(7);
Title 21, United States Code, Section 853(p); and
Title 28, United States Code, Section 2461)


PREET BHARARA
United States Attorney

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(18 U.S.C. §1349)

PREET BHARARA
United States Attorney.
