

FILED
JUN 26 2018
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

BORIS DADIOMOV,

Defendant.

Case No. **18CR3015-BAS**

INFORMATION

Title 18, United States Code, Section 1349 - Conspiracy to Commit Honest Services Mail Fraud and Health Care Fraud; and Title 28, U.S.C., § 2461(c) - Criminal Forfeiture

The United States charges:

COUNT 1
CONSPIRACY
18 U.S.C. § 1349

Beginning on a date unknown and continuing through at least June 2015, within the Southern District of California and elsewhere, defendant BORIS DADIOMOV did knowingly and intentionally conspire with CARLOS ARGUELLO, FERMIN IGLESIAS, and others to: commit Honest Services Mail Fraud, that is, knowingly and with the intent to defraud, devise and participate in a material scheme to defraud and to deprive patients of the intangible right to their doctors' honest services, and cause mailings in furtherance of the scheme, in violation of Title 18, United States Code, Sections 1341 and 1346; and commit Health Care Fraud, that

1 is, knowingly and with the intent to defraud, devise and participate in
2 a material scheme to defraud a health care benefit program, or to obtain
3 money or property owned by, or under the custody or control of, a health-
4 care benefit program by means of false or fraudulent pretenses,
5 representations, or promises, in violation of Title 18, United States
6 Code, Section 1347.

7 All in violation of Title 18, United States Code, Section 1349.

8 FORFEITURE ALLEGATION

9 Upon conviction of the felony offense alleged in this Information
10 set forth above and pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C.
11 § 2461(c), and Federal Rule of Criminal Procedure 32.2, defendant CARLOS
12 ARGUELLO shall forfeit to the United States any property, real or
13 personal, which constitutes or was derived from proceeds traceable to
14 such violation.

15 If any of the above-described forfeited property, as a result of
16 any act or omission of BORIS DADIOMOV cannot be located upon the exercise
17 of due diligence; has been transferred or sold to, or deposited with, a
18 third person; has been placed beyond the jurisdiction of the Court; has
19 been substantially diminished in value; or has been commingled with
20 other property which cannot be subdivided without difficulty, it is the
21 intent of the United States, pursuant to

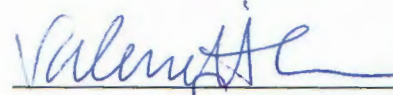
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1 21 U.S.C. § 853(p), made applicable herein by 28 U.S.C. § 2461(c), to
2 seek forfeiture of any other property of BORIS DADIOMOV up to the value
3 of the property subject to forfeiture.

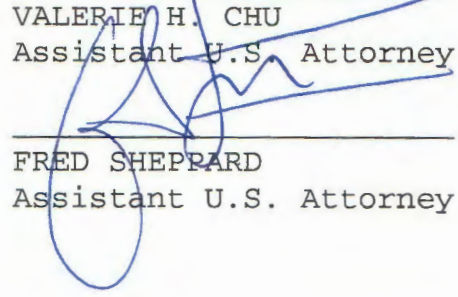
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DATED: *June 26, 2018*

ADAM L. BRAVERMAN
United States Attorney



VALERIE H. CHU
Assistant U.S. Attorney



FRED SHEPPARD
Assistant U.S. Attorney