

ALUSA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

CASE NO.: 12-CR-20042

JUDGE: HON. ROBERT H. CLELAND

UNITED STATES OF AMERICA

v.

D-1 ZAFAR MEHMOOD,  
D-2 BADAR AHMADANI,  
D-3 FALUSIC ASHFORD, aka "LUCY,"

VIO.: 18 U.S.C. § 1349  
18 U.S.C. § 1347  
18 U.S.C. § 1956(h)  
18 U.S.C. § 1956(a)(1)(B)(i)  
18 U.S.C. § 371  
18 U.S.C. § 2

Defendants.

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

General Allegations

At all times relevant to this Indictment:

1. The Medicare program was a federal health care program providing benefits to persons who were over the age of 65 or disabled. Medicare was administered by the Centers for Medicare and Medicaid Services (CMS), a federal agency under the United State Department of Health and Human Services. Individuals who received benefits under Medicare were referred to as Medicare "beneficiaries."

2. Medicare was a "health care benefit program," as defined by Title 18, United States Code, Section 24(b).

3. The Medicare program included coverage under two primary components, hospital insurance (Part A) and medical insurance (Part B). Part A covered physical therapy, occupational therapy, and skilled nursing services if a facility was certified by CMS as meeting

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certain requirements. Part B of the Medicare Program covered the cost of physicians' services and other ancillary services not covered by Part A. The physical therapy, occupational therapy and other services at issue in this Indictment were covered by Part A.

4. National Government Services was the CMS intermediary for Medicare Part A in the state of Michigan. TrustSolutions, LLC was the Program Safeguard Contractor for Medicare Part A in the state of Michigan.

5. By becoming a participating provider in Medicare, enrolled providers agree to abide by the policies and procedures, rules, and regulations governing reimbursement. To receive Medicare funds, enrolled providers, together with their authorized agents, employees, and contractors, are required to abide by all the provisions of the Social Security Act, the regulations promulgated under the Act, and applicable policies and procedures, rules, and regulations, issued by CMS and its authorized agents and contractors.

6. Upon certification, the medical provider, whether a clinic or an individual, is assigned a provider identification number for billing purposes (referred to as a PIN). When the medical provider renders a service, the provider submits a claim for reimbursement to the Medicare contractor/carrier that includes the PIN assigned to that medical provider. When an individual medical provider is associated with a clinic, Medicare Part B required that the individual provider number associated with the clinic be placed on the claim submitted to the Medicare contractor.

7. Health care providers are given and/or provided with online access to Medicare manuals and services bulletins describing proper billing procedures and billing rules and regulations. Providers can only submit claims to Medicare for services they rendered and

providers must maintain patient records to verify that the services were provided as described on the claim form.

8. To receive reimbursement for a covered service from Medicare, a provider must submit a claim, either electronically or using a form (e.g., a CMS-1500 form or UB-92), containing the required information appropriately identifying the provider, patient, and services rendered.

9. A home health agency is an entity that provides health services, including but not limited to skilled nursing, physical and occupational therapy, and speech pathology services to homebound patients.

10. Access Care Home Care, Inc. (Access) was a Michigan corporation doing business at 4640 Nutmeg Drive, Ypsilanti, Michigan and 850 S. Hewitt Road, Suite 1, Ypsilanti, Michigan. Access was a home health agency that purportedly provided home health services to patients. Access was a Medicare provider and submitted claims directly to Medicare. Access was owned by ZAFAR MEHMOOD.

11. Patient Care Home Care, Inc. (Patient Care) was a Michigan corporation doing business at 850 South Hewitt Road, Suite 160, Ypsilanti, Michigan. Patient Care was a home health agency that purportedly provided home health services to patients. Patient Care was a Medicare provider and submitted claims directly to Medicare. Patient Care was owned by ZAFAR MEHMOOD.

12. Hands On Healing Home Care, Inc. (HOH) was a Michigan corporation doing business at 3031 West Grand Boulevard, Suite 626, Detroit, Michigan. HOH was a home health agency that purportedly provided home health services to patients. HOH was a Medicare

provider and submitted claims directly to Medicare. HOH was owned by ZAFAR MEHMOOD and BADAR AHMADANI.

13. All State Home Care, Inc. (All State) was a Michigan corporation doing business at 4640 Nutmeg Drive, Ypsilanti, Michigan and 3031 W. Grand Blvd., Suite 430, Ypsilanti, Michigan. All State was a home health agency that purportedly provided home health services to patients. All State was a Medicare provider and submitted claims directly to Medicare. All State was owned by ZAFAR MEHMOOD.

14. Exclusive Rehab Services, Inc. (Exclusive) was a Michigan corporation doing business at 316 Ecorse Road, Suite 101, Ypsilanti, Michigan.

15. New Light Physical Therapy and Rehab, Inc. (New Light) was a Michigan corporation doing business at 201 Stevens Drive, Suite 202, Ypsilanti, Michigan and 4640 Nutmeg Dr., Ypsilanti, Michigan.

16. ZAFAR MEHMOOD, a resident of Washtenaw County, Michigan, was an owner and controller of Access, Patient Care, HOH and All State.

17. BADAR AHMADANI, a resident of Washtenaw County, Michigan, was an owner of HOH, and a physical therapy assistant.

18. FALUSIC ASHFORD, aka "LUCY," a resident of Wayne County, Michigan, was a patient recruiter working for Access and Patient Care.

**COUNT 1**  
**(18 U.S.C. § 1349 - Health Care Fraud Conspiracy)**  
**D-1 ZAFAR MEHMOOD**  
**D-2 BADAR AHMADANI**  
**D-3 FALUSIC ASHFORD aka "LUCY"**

19. Paragraphs 1 through 18 of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.

20. From in or around March 2006 and continuing through in or around September 2011, the exact dates being unknown to the Grand Jury, at Wayne County and Washtenaw County, in the Eastern District of Michigan, and elsewhere, the defendants ZAFAR MEHMOOD, BADAR AHMADANI, FALUSIC ASHFORD and other co-conspirators known and unknown did willfully and knowingly combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1347, that is, to execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services.

**Purpose of the Conspiracy**

21. It was a purpose of the conspiracy for the defendants ZAFAR MEHMOOD, BADAR AHMADANI, FALUSIC ASHFORD and other co-conspirators known and unknown to unlawfully enrich themselves by, among other things, (a) submitting false and fraudulent claims to Medicare; (b) offering and paying kickbacks and bribes to Medicare beneficiaries for the purpose of such beneficiaries arranging for the use of their Medicare beneficiary numbers by the conspirators as the bases of claims filed for physical therapy and other services; (c) soliciting and receiving kickbacks in return for arranging for the furnishing of services for which payment may be made by Medicare by providing their Medicare beneficiary numbers, which were used to file claims for physical therapy and other services; (d) concealing the submission of false and fraudulent claims to Medicare, the receipt and transfer of the proceeds from the fraud, and the

payment of kickbacks; and (e) diverting proceeds of the fraud for the personal use and benefit of the defendants and their co-conspirators.

**Manner and Means**

The manner and means by which the defendants and their co-conspirators sought to accomplish the purpose of the conspiracy included, among others, the following:

22. ZAFAR MEHMOOD and BADAR AHMADANI would maintain a Medicare provider number for HOH to submit Medicare claims for the cost of home health services that were medically unnecessary and were not provided.

23. ZAFAR MEHMOOD would maintain a Medicare provider number for Access, Patient Care and All State to submit Medicare claims for the cost of home health services that were medically unnecessary and were not provided.

24. ZAFAR MEHMOOD and other co-conspirators would control the day-to-day operations at Access, Patient Care, HOH and All State.

25. ZAFAR MEHMOOD's other co-conspirators would assist in managing the day-to-day operations at Access, Patient Care, HOH and All State.

26. BADAR AHMADANI would manage the day-to-day operations at HOH.

27. ZAFAR MEHMOOD directed his co-conspirators to offer and pay kickbacks and bribes to Medicare beneficiaries who were purported patients at Access, Patient Care, HOH and All State. The Medicare beneficiaries would receive cash and other remuneration in exchange for their Medicare numbers and signing documents making it appear that they had received the treatments being billed to Medicare, when in fact such treatments were medically unnecessary and were not provided.

28. ZAFAR MEHMOOD, BADAR AHMADANI and others would pay kickbacks and bribes to recruiters, including FALUSIC ASHFORD, for each patient they recruited through this kickback scheme.

29. FALUSIC ASHFORD and other patient recruiters would pay kickbacks and bribes to patients in exchange for their Medicare beneficiary information and to sign them up for home health care services that were medically unnecessary.

30. BADAR AHMADANI and others would pay kickbacks and bribes to physicians and employees of physicians to sign home health referrals for medically unnecessary treatments.

31. ZAFAR MEHMOOD, BADAR AHMADANI and other co-conspirators would fabricate and falsify medical and billing documents reflecting or supporting purported home health services and other services billed to Medicare that were not medically necessary and were not provided.

32. ZAFAR MEHMOOD and others would cause Access, Patient Care, HOH and All State to submit approximately \$33 million in claims to Medicare for the cost of home health services and other services.

33. ZAFAR MEHMOOD, BADAR AHMADANI, FALUSIC ASHFORD and others would transfer and disburse, and cause the transfer and disbursement of, monies from the various corporate accounts of Access, Patient Care, HOH and All State to themselves and others.

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

**COUNTS 2-5**  
**(18 U.S.C. §§ 1347 and 2 – Health Care Fraud)**  
**D-1 ZAFAR MEHMOOD**

34. Paragraphs 1 through 18 of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.

35. On or about the dates enumerated below, at Wayne County and Washtenaw County, in the Eastern District of Michigan, and elsewhere, ZAFAR MEHMOOD, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of Medicare, in connection with the delivery of and payment for health care benefits, items and services.

**Purpose of the Scheme and Artifice**

36. It was the purpose of the scheme and artifice for the defendant and his co-conspirators to unlawfully enrich themselves through the submission of false and fraudulent Medicare claims for home health services that were medically unnecessary and not performed.

**The Scheme and Artifice**

37. Paragraphs 22 through 33 of Count 1 of this Indictment are realleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

**Acts in Execution of the Scheme and Artifice**

38. On or about the dates specified as to each count below, in Wayne County and Washtenaw County, in the Eastern District of Michigan, and elsewhere, the defendant, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice to defraud a health care benefit program affecting commerce, that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises,



money and property owned by, and under the custody and control of said health care benefit program.

Count	Medicare Beneficiary	Company Billing	Approximate Dates of Service	Description of Items Billed	Approximate Amount Claimed	Approximate Date Paid
2	C.T.	Patient Care	12/9/06-1/17/07	Physical Therapy and Skilled Nursing	\$4383.36	11/26/07
3	J.J.	Patient Care	1/31/08-3/18/08	Physical Therapy	\$4833.92	6/17/09
4	K.Y.	Access Care	12/6/08-12/17/08	Physical Therapy	\$4914.23	2/26/10
5	T.G.	Access Care	3/12/09-5/8/09	Skilled Nursing	\$1627.41	7/6/09

In violation of Title 18, United States Code, Sections 1347 and 2.

**COUNT 6**

**(18 U.S.C. § 371 – Conspiracy to Pay and Receive Health Care Kickbacks)**

**D-1 ZAFAR MEHMOOD**

**D-2 BADAR AHMADANI**

**D-3 FALUSIC ASHFORD, aka “LUCY”**

39. Paragraphs 1 through 18 of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.

40. From in or around March 2006, and continuing through in or around November 2011, the exact dates being unknown to the Grand Jury, at Wayne County and Washtenaw County, in the Eastern District of Michigan, and elsewhere, the defendants ZAFAR MEHMOOD, BADAR AHMADANI, FALUSIC ASHFORD and other co-conspirators known and unknown did willfully and knowingly combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is,

(a) to violate Title 42, United States Code, Section 1320a-7b(b)(2)(A) by knowingly and willfully offering or paying any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind in return for referring an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part by Medicare, a Federal health care program as defined in Title 18, United States Code, Section 24(b); and

(b) to violate Title 42, United States Code, Section 1320a-7b(b)(1)(A) by knowingly and willfully soliciting or receiving any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind in return for referring an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part by Medicare, a Federal health care program as defined in Title 18, United States Code, Section 24(b).

**Purpose of the Conspiracy**

41. It was a purpose of the conspiracy for defendant ZAFAR MEHMOOD, BADAR AHMADANI and others to unlawfully enrich themselves by offering and paying kickbacks and bribes to patient recruiters, including FALUSIC ASHFORD and others, who solicited and received kickbacks and bribes, and in return provided Medicare beneficiaries, on whose behalf MEHMOOD and others could bill Medicare for home health services.

42. It was a purpose of the conspiracy for defendants ZAFAR MEHMOOD, BADAR AHMADANI and others to pay kickbacks and bribes to physicians or employees of physicians for home health care referra

### Manner and Means

The manner and means by which the defendants sought to accomplish the purpose of the conspiracy included, among other things:

43. ZAFAR MEHMOOD would establish Access, Patient Care, HOH and All State in Ypsilanti, Michigan for the purpose of billing Medicare for purportedly providing home health services and other services to patients.

44. ZAFAR MEHMOOD would write checks from Access, Patient Care, HOH and All State bank accounts to at least two other companies owned by co-conspirators, New Light and Exclusive.

45. ZAFAR MEHMOOD and his co-conspirators would then write checks from New Light and Exclusive's accounts to a co-conspirator and a company owned by that co-conspirator.

46. These checks, in part, were to pay patient recruiters in exchange for the referral of Medicare beneficiaries to be billed by Access, Patient Care, HOH and All State for home health services and other services.

47. Patient recruiters, including FALUSIC ASHFORD, would offer and pay kickbacks and bribes to patients to receive home health services for Patient Care and Access.

48. Over the course of the kickback scheme, ZAFAR MEHMOOD paid the co-conspirator approximately \$220,000 to pay kickbacks to pay a patient recruiter and for other purposes. In exchange for the payments, ZAFAR MEHMOOD would receive Medicare beneficiary referrals from a patient recruiter, the co-conspirator and others.

49. ZAFAR MEHMOOD would pay FALUSIC ASHFORD for Medicare beneficiary referrals for Patient Care and Access.

50. BADAR AHMADANI would pay physicians and employees of physicians to refer patients for home health care. AHMADANI would also pay recruiters to provide Medicare beneficiary referrals.

**Overt Acts**

In furtherance of the conspiracy, and to accomplish its purposes and objects, at least one of the conspirators committed, or caused to be committed, in the Eastern District of Michigan, the following overt acts, among others:

51. On or about July 24, 2007, ZAFAR MEHMOOD paid to a co-conspirator's company \$900 by check drawn from an Exclusive bank account. The co-conspirator used that money to pay a patient recruiter in exchange for Medicare beneficiary referrals.

52. On or about September 25, 2007, Exclusive paid a co-conspirator \$900 by check drawn from an Exclusive bank account. The co-conspirator used that money to pay a patient recruiter in exchange for Medicare beneficiary referrals.

53. On or about October 5, 2007, Exclusive paid FALUSIC ASHFORD \$2000 by check for Medicare beneficiary referrals.

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

**COUNT 7**  
**(18 U.S.C. § 1956(h) – Money Laundering Conspiracy)**  
**D-1 ZAFAR MEHMOOD**

54. From in or about March 2006 through in or about November 2011, in Wayne County and Washtenaw County, in the Eastern District of Michigan, and elsewhere, the defendant, ZAFAR MEHMOOD did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, and agree with other persons, known and

unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and Section 1957, to wit:

- a. to knowingly conduct a financial transaction affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);
- b. to knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNTS 8-9**  
**(18 U.S.C. §§ 1956(a)(1)(B)(i) and 2 – Money Laundering)**

55. On or about the dates specified as to each count below, in Wayne County and Washtenaw County, in the Eastern District of Michigan, and elsewhere, the defendant ZAFAR MEHMOOD as specified below, knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, which in fact involved the proceeds of

specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity:

Count	Check Number	Amount	On or about Date	Financial Transaction
8	1165	\$7000	11/23/07	Check from Exclusive's Charter One bank account #XXXXXXX0957 to Tausif Rahman
9	1209	\$5000	12/27/07	Check from Exclusive's Charter One bank account #XXXXXXX0957 to Tausif Rahman

**FORFEITURE ALLEGATIONS**  
**(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461;**  
**18 U.S.C. §§ 982(a)(1) and 982(a)(7) - Criminal Forfeiture)**

56. The above allegations contained in this First Superseding Indictment are incorporated by reference as if set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Sections 981 and 982, and Title 28, United States Code, Section 2461.

57. As a result of the violation of Title 18, United States Code, Section 1349, as set forth in this First Superseding Indictment, defendant ZAFAR MEHMOOD, BADAR AHMADANI, and FALUSIC ASHFORD, shall forfeit to the United States any property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461.

58. As a result of the violations of Title 18, United States Code, Sections 1347 and 2, as set forth in this First Superseding Indictment, defendant ZAFAR MEHMOOD, shall forfeit to

the United States any property, real or personal, that constitutes or is derived from, gross proceeds traceable to the commission of such violations, pursuant to 18 U.S.C. § 982(a)(7).

59. As a result of the violations of Title 18, United States Code, Section 371, as set forth in this First Superseding Indictment, defendants ZAFAR MEHMOOD, BADAR AHMADANI, and FALUSIC ASHFORD shall forfeit to the United States any property, real or personal, that constitutes or is derived from, gross proceeds traceable to the commission of such violations, pursuant to 18 U.S.C. § 982(a)(7).

60. As a result of the violations of Title 18, United States Code, Sections 1956 and 2, as set forth in this First Superseding Indictment, defendant ZAFAR MEHMOOD shall forfeit to the United States any property, real or personal, involved in said violations, or any property traceable to such property, pursuant to 18 U.S.C. § 982(a)(1).

61. Real and personal property subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), and 18 U.S.C. §§ 982(a)(1) and 982(a)(7), includes, but is not limited to, the following:

**I. REAL PROPERTY**

- a. Real property located at 4640 Nutmeg Drive, Ypsilanti, Michigan, and being more fully described as:

Land situated in the Township of Pittsfield, County of Washtenaw, State of Michigan. Lot(s) 177, Hickory Pointe Subdivision, according to the plat thereof as recorded in Liber 32, Page(s) 91-98 of Plats, Washtenaw County Records.  
Tax Parcel No. L-12-24-115-177;

- b. Real property located at 4880 Munger Road, Ypsilanti, Michigan, and being more fully described as:

Land situated in the Township of Pittsfield, County of Washtenaw, State of Michigan. Commencing at the Southeast corner of Section 13, Town 3 South, Range 6 East, Pittsfield Township, Washtenaw County, Michigan; thence North

00 degrees 02 minutes 00 seconds West 566 feet in the East line of Section, for a place of beginning; thence continuing North 00 degrees 02 minutes 00 seconds West 100 feet in the East line of Section; thence South 89 degrees 58 minutes 00 seconds West 300 feet; thence South 00 degrees 02 minutes 00 seconds East parallel with the East line of Section 100 feet; thence North 89 degrees 58 minutes 00 seconds East 300 feet to the place of beginning.

Tax Parcel No. L-12-13-400-014;

- c. Real property located at 850 S. Hewitt Road, Ypsilanti, Michigan, Washtenaw

County, Michigan and being more fully described as:

A parcel of land being part of the Northeast  $\frac{1}{4}$  of Section 18, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan more particularly described as: Commencing at the Northwest corner of French Claim 680, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan; thence along the West line of French Claim 680 South 16 degrees 04 minutes 20 seconds East 632.98 feet to a point on the Northerly right-of-way line of the I-94 Expressway; thence along said right-of-way 1055.63 feet along a curve to the right having a radius of 14199.00 feet through a central angle of 04 degrees 15 minutes 35 seconds along said curve having a chord direction of South 89 degrees 17 minutes 50 seconds West and a chord length of 1055.39 feet; thence along said right-of-way line North 88 degrees 34 minutes 20 seconds West 64.68 feet to a point on the Easterly right-of-way line of the Michigan Avenue and the I-94 interchange; thence along said right-of-way line in the following courses: thence North 06 degrees 04 minutes 50 seconds West 357.15 feet to the point of beginning; thence North 06 degrees 04 minutes 50 seconds West 91.18 feet; thence North 89 degrees 51 minutes 00 seconds West 231.63 feet; thence North 41 degrees 25 minutes 30 seconds East 176.58 feet; thence 131.44 feet along a curve to the right having a radius of 1805.86 feet through a central angle of 04 degrees 10 minutes 13 seconds along said curve having a chord direction of North 43 degrees 30 minutes 35 seconds East and a chord length of 131.41 feet; thence North 06 degrees 04 minutes 50 seconds West 151.74 feet to a point on the center line of Michigan Avenue; thence along the center line of Michigan Avenue North 56 degrees 31 minutes 05 seconds East 447.74 feet; thence along the center-line of Michigan Avenue a distance of 13.37 feet along a curve to the right having a radius of 13484.27 feet through a central angle of 00 degrees 03 minutes 24 seconds along said curve having a chord direction of North 54 degrees 58 minutes 27 seconds East and a chord length of 13.37 feet; thence South 33 degrees 00 minutes 00 seconds East 863.93 feet; thence South 90 degrees 00 minutes 00 seconds West 804.86 feet to the point of beginning.

Tax Assessed legal described as: A parcel of land being part of the Northeast  $\frac{1}{4}$  of Section 18, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan more particularly described as: Commencing at the Northwest corner of French Claim 680, Town 3 South, Range 7 East, Ypsilanti Township,



Washtenaw County, Michigan; thence along the West line of French Claim 680 South 16 degrees 04 minutes 20 seconds East 632.98 feet to a point on the Northerly right-of-way line of the I-94 Expressway; thence along said right-of-way 1055.63 feet along a curve to the right having a radius of 14199.00 feet through a central angle of 04 degrees 15 minutes 35 seconds along said curve having a chord direction of South 89 degrees 17 minutes 50 seconds West and a chord length of 1055.39 feet; thence along said right-of-way line North 88 degrees 34 minutes 20 seconds West 64.68 feet to a point on the Easterly right-of-way line of the Michigan Avenue and the I-94 interchange; thence along said right-of-way line in the following courses: thence North 06 degrees 04 minutes 50 seconds West 357.15 feet to the point of beginning; thence North 06 degrees 04 minutes 50 seconds West 91.18 feet; thence North 89 degrees 51 minutes 00 seconds West 231.63 feet; thence North 41 degrees 25 minutes 30 seconds East 176.58 feet; thence 131.44 feet along a curve to the right having a radius of 1805.86 feet through a central angle of 04 degrees 10 minutes 13 seconds along said curve having a chord direction of North 43 degrees 30 minutes 35 seconds East and a chord length of 131.41 feet; thence North 06 degrees 04 minutes 50 seconds West 151.74 feet to a point on the center line of Michigan Avenue; thence along the center line of Michigan Avenue North 56 degrees 31 minutes 05 seconds East 447.74 feet; thence along the center-line of Michigan Avenue a distance of 13.37 feet along a curve to the right having a radius of 13484.27 feet through a central angle of 00 degrees 03 minutes 24 seconds along said curve having a chord direction of North 54 degrees 58 minutes 27 seconds East and a chord length of 13.37 feet; thence South 33 degrees 00 minutes 00 seconds East 863.93 feet; thence South 90 degrees 00 minutes 00 seconds West 804.86 feet to the point of beginning.

Subject to and together with Reservation of Private Drive easement for ingress and egress described as: Commencing at the Northwest corner of the French Claim 680; thence along the West line of the French Claim 680 South 16 degrees 04 minutes 20 seconds East 65.64 feet; thence South 73 degrees 55 minutes 40 seconds West 66 feet; thence 169.56 feet along a curve to right having a radius of 75 feet through central angle of 129 degrees 32 minutes 16 seconds along said curve having a chord direction of North 62 degrees 19 minutes 43 seconds West and chord length of 135.69 feet; thence North 87 degrees 35 minutes 30 seconds West 3 feet; thence North 02 degrees 24 minutes 30 seconds West 28.63 feet to point of beginning; thence 23.56 feet along curve to left having a radius of 15 feet through central angle of 90 degrees 00 minutes 00 seconds along said curve having a chord direction of North 42 degrees 35 minutes 30 seconds West and chord length of 21.21 feet; thence North 87 degrees 35 minutes 30 seconds West 4.40 feet; thence 121.74 feet along curve to left having a radius of 197 feet through central angle of 35.24 degrees 24 minutes 30 seconds along said curve having a chord direction of South 74 degrees 42 minutes 15 seconds West and chord length of 119.82 feet; thence South 57 degrees 00 minutes 00 seconds West 37.23 feet; thence North 33 degrees 00 minutes 00 seconds West 66 feet; thence North 57 degrees 00 minutes 00 seconds East 37.23 feet; thence 162.53 feet along

curve to right having a radius of 263 feet through central angle of 35 degrees 24 minutes 30 seconds along said curve having a chord North 74 degrees 42 minutes 15 seconds East and chord length of 159.96 feet; thence South 87 degrees 35 minutes 30 seconds East 4.40 feet; thence 23.56 along curve to left having a radius of 15 feet through a central angle of 90 degrees 00 minutes 00 seconds along curve having a chord direction of North 47 degrees 24 minutes 30 seconds East and chord length of 21.21 feet; thence South 02 degrees 24 minutes 30 seconds West 96 feet to point of beginning.  
Commonly known as: 850 S. Hewitt Road  
Tax ID No.: K-11-18-100-017

## II. CURRENCY

- a. Nine Thousand Six Hundred Fifty-Six Dollars and Sixty-Eight Cents (\$9,656.68) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4511706378, held in the name of Access Care Home Care Inc.;
- b. Thirty Dollars and Seven Cents (\$30.07) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4511725577, held in the name of Patient Care Home Care, Inc.;
- c. Twenty Five Thousand One Hundred Forty-Three Dollars and Sixty-Seven Cents (\$25,143.67) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 2790289906, held in the name of Patient Care Home Care, Inc.;
- d. Fourteen Thousand Five Hundred Twenty-Nine Dollars and Eight Cents (\$14,529.08) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510167902, held in the name of Al-Hafiz, LLC;
- e. Two Thousand One Hundred Seventeen Dollars and Sixty-Three Cents (\$2,117.63) in United States Currency seized on or about November 3, 2011, from

Charter One Bank Account Number 4510168917, held in the name of Shifa Home Health Care, Inc.;

- f. Seventeen Thousand Seven Hundred Sixty-Seven Dollars and Thirty Cents (\$17,767.30) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4504553618, held in the name of Smart Home Health Care;
- g. One Thousand Four Hundred Fifty-Nine Dollars and Seventy-Eight Cents (\$1,459.78) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510168909, held in the name of Senior Care Home Health Care;
- h. Four Thousand Four Hundred Sixty-Eight Dollars and Fifty Cents (\$4,468.50) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510168348, held in the name of General Home Health Care, Inc.;
- i. Two Thousand Nine Hundred Eighty-Four Dollars and Fifty-Five Cents (\$2,984.55) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510168089, held in the name of Legacy Home Health Care, Inc.;
- j. Two Thousand One Hundred Five Dollars and Eighty-Six Cents (\$2,105.86) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510168070, held in the name of Signature Care Home Care, Inc.;
- k. Two Thousand Seven Hundred Twenty-Two Dollars (\$2,722.00) in United States

Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510168046, held in the name of United Care Home Care, Inc.;

- l. Thirteen Thousand Nine Hundred Ninety-Seven Dollars and Sixty-Five Cents (\$13,997.65) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510168038, held in the name of Advance Care Home Care, Inc.;
- m. One Thousand Seven Hundred Seventy-Six Dollars and Twenty-Two Cents (\$1,776.22) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4509056175, held in the name of Visiting Angels of Home Health Care, Inc.;
- n. Three Thousand Five Hundred Forty-Three Dollars and Forty-Six Cents (\$3,543.46) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4504553251, held in the name of Community Care Rehab, Inc.;
- o. Five Thousand Nine Hundred Sixty Dollars and Eighty-Three Cents (\$5,960.83) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510167767, held in the name of Official Home Health Services, Inc.;
- p. Forty-Six Dollars and Fifty Cents (\$46.50) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510167783, held in the name of Primo Home Health Services, Inc.;
- q. One Thousand Six Hundred Seventy-Four Dollars and Seventy-Nine Cents (\$1,674.79) in United States Currency seized on or about November 3, 2011, from

Charter One Bank Account Number 4504553308, held in the name of Official Home Health Services, Inc.;

- r. Thirty Eight Thousand Nine Hundred Seventy Dollars and Thirty-Four Cents (\$38,970.34) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4504553588, held in the name of Traditional Home Health Care, Inc.;
- s. Twenty Six Thousand Three Hundred Fifty Dollars and Seven Cents (\$26,350.07) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4505754412, held in the name of Zafar Mehmood;
- t. Twenty Three Thousand Eight Hundred Thirty-Seven Dollars and Ninety-Seven Cents (\$23,837.97) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4504170336, held in the name of Primo Home Health Services,
- u. One Hundred Fifty-Five Dollars and Eighty Cents (\$155.80) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4504553596, held in the name of Total Care Home Health Care, Inc.;
- v. Three Thousand Eight Hundred Sixty-Seven Dollars and Twelve Cents (\$3,867.12) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510169506, held in the name of Caring Hearts Home Health Care, Inc.;
- w. Eight Hundred Ninety-Four Dollars and Eighty-Six Cents (\$894.86) in United States Currency seized on or about November 3, 2011, from Charter One Bank Account Number 4510169492, held in the name of Horizon Home Health Care,

Inc.;

- x. Six Thousand Two Hundred Forty-Nine Dollars and Thirty-Five Cents (\$6,249.35) in United States Currency seized on or about November 3, 2011, from Chase Bank Account Number 638108662, held in the name of All State Home Care, Inc.;
- y. Five Hundred Ninety-One Dollars and Seven Cents (\$591.07) in United States Currency seized on or about November 3, 2011, from Chase Bank Account Number 733071575, held in the name of Zafar Mehmood; and
- z. Seventeen Thousand Three Hundred Sixty-Nine Dollars and Fifty Cents (\$17,369.50) in United States Currency seized on or about November 3, 2011, from Chase Bank Account Number 717126304, held in the name of Victory Home Health Care, Inc.

62. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- 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 that cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b) and/or 28 U.S.C. § 2461, to seek to forfeit any other property of the defendants up to the value of the forfeitable property described above.

63. Money Judgment: A sum of money equal to at least \$33 million in United States currency, or such amount as is proved at trial in this matter, representing the total amount of proceeds obtained as a result of the violations of 18 U.S.C. §§ 1349, 1347 and 371, and representing the total amount involved in the violations of 18 U.S.C. § 1956, as alleged in this First Superseding Indictment.

THIS IS A TRUE BILL.

s/GRAND JURY FOREPERSON  
Grand Jury Foreperson

BARBARA L. MCQUADE  
United States Attorney

s/WAYNE F. PRATT  
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Dated: April 24, 2012