

FILED
1/25/2022

EY

JUDGE CHANG
MAGISTRATE JUDGE FUENTES

THOMAS G. BRITTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
MICHAEL D. EGAN)

No. **1:22-CR-00044**
Violation: Title 18, United States
Code, Section 1343

The UNITED STATES ATTORNEY charges:

1. At times material to this Information:

a. Defendant MICHAEL D. EGAN was a dentist licensed in the State of Illinois and the owner and operator of Company A, a dental office located in Tinley Park, Illinois.

b. Lending Company A was a business that offered customers loans to finance medical services, including dental care.

2. Beginning in or around October 2015, and continuing until on or about August 24, 2016, at Tinley Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

MICHAEL D. EGAN,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud Lending Company A, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that EGAN fraudulently obtained approximately \$1,200,000 from Lending Company A by facilitating the submission of

fraudulent applications for medical care loans to Lending Company A by purported dental patients recruited by EGAN, which applications were based on dental work plans that EGAN represented would be performed by him, which he knew he would not, and in fact did not perform.

4. It was further part of the scheme that EGAN used other individuals as “recruiters,” who identified purported dental patients to apply for loans from Lending Company A for dental treatment from EGAN, which EGAN never intended to provide and never did provide.

5. It was further part of the scheme that EGAN paid a portion of the fraudulently obtained loan proceeds, which were issued directly to him from Lending Company A, to recruiters and to the purported dental patients, and kept the remaining proceeds for his own benefit.

6. It was further part of the scheme that after Lending Company A approved loans to purported dental patients, EGAN fraudulently caused loan amounts to be increased by falsely informing Lending Company A that additional dental work was needed, when EGAN knew that no dental work, additional or otherwise, would be performed by him.

7. It was further part of the scheme that EGAN created a false spreadsheet showing purported dental work that he had performed on Lending Company A borrowers, knowing he had not performed the work, and caused the spreadsheet to be provided to Lending Company A to support the amount of loan proceeds that had been disbursed on behalf of EGAN’s purported patients.

8. It was further part of the scheme that EGAN concealed, misrepresented, and hid and caused to be concealed, misrepresented, and hidden, the existence, purpose, and acts done in furtherance of the scheme.

9. On or about August 8, 2016, at Tinley Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

MICHAEL D. EGAN,

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer of approximately \$11,115 from Lending Company A's bank account at NBT Bank to Company A's bank account at JP Morgan Chase Bank;

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Information, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
2. The property to be forfeited includes but is not limited to a personal money judgment in the amount of approximately \$1,200,000.
3. If any property described above, as a result of any act or omission by the defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

/s/ John R. Lausch, Jr., by TCM
UNITED STATES ATTORNEY