

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 21-
	:	
JONAS KNOPF	:	18 U.S.C. § 1035
	:	

INFORMATION

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

COUNT ONE
(Making False Statements Relating to a Health Care Benefit Program)

At all times relevant to this Information:

1. Defendant JONAS KNOPF (“KNOPF”) was the owner and operator of a financial services business in Lakewood, New Jersey. He exercised discretionary control over Company-1, Company-2 and Company-3 (collectively, “the Companies”). KNOPF was also an insurance producer/broker who offered health insurance to his clients through Health Care Company-1 (“HCC-1”), an association of independent health care companies, which had affiliates in Pennsylvania and elsewhere. The Companies existed largely to obtain favorable insurance rates to be sold by KNOPF to his clients. In truth, the Companies did not transact business in Pennsylvania.

2. The HCC-1 affiliates were health insurance providers, as defined by Title 18, United States Code, Section 24(b). The HCC-1 affiliates were responsible for paying claims for medical services incurred by KNOPF’S clients

and their dependents.

3. From at least as early as January 2009 through at least December 2012, the following HCC-1 affiliates were induced to provide coverage for the ineligible participants from the Companies:

- i. Health Care Company Affiliate-1 (“HCCA-1”), headquartered in Philadelphia, Pennsylvania.
- ii. Health Care Company Affiliate-2 (“HCCA-2”), headquartered in Harrisburg, Pennsylvania.

4. In March 2013, KNOPF ceased offering health care coverage to his clients from HCC-1 affiliates in Pennsylvania.

5. From at least in or around January 2009 through at least in or around March 2013, in the Districts of New Jersey and Pennsylvania, and elsewhere, the defendant,

JONAS KNOPF,

in a matter involving the health care benefit programs of HCC-1 affiliates, did knowingly and willfully falsify, conceal, and cover up, by trick, scheme and device, material facts, in connection with the delivery of approximately one and a half million dollars (\$1,500,000) in health care benefits, items, and services.

In violation of Title 18, United States Code, Section 1035.

FORFEITURE ALLEGATION

1. Upon conviction of one or more of the Federal health care offenses as defined in 18 U.S.C. § 24 alleged in this Information, defendant JONAS KNOPF shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), all

property, real and personal, obtained by the defendant that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of such offense.

Substitute Assets Provision

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (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), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.


RACHAEL A. HONIG
Acting United States Attorney

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