

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 :
 UNITED STATES OF AMERICA :
 : INFORMATION
 - v - :
 : 18 Cr. § 26
 CHARLES BAGLEY, :
 :
 Defendant. :
 :
 ----- X

COUNT ONE
 (Conspiracy to Commit Healthcare Fraud)

The United States Attorney charges:

1. From in or about June 2016 through in or about March 2017, in the Southern District of New York and elsewhere, CHARLES BAGLEY, the defendant, and others known and unknown, conspired to violate Title 18, United States Code, Section 1347.

2. It was a part and object of the conspiracy that CHARLES BAGLEY, the defendant, and others known and unknown, would and did knowingly and willfully 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 benefit program in connection with delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347, to wit, BAGLEY, a licensed medical doctor, agreed with

others to submit, and cause to be submitted, false claims to Medicare and other health care benefit programs to obtain reimbursement to which they were not entitled.

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

FOREFITURE ALLEGATIONS AS TO COUNT ONE

3. As a result of committing the federal health care fraud offense charged in Count One of this Information, in violation of 18, United States Code, Section 1349, CHARLES BAGLEY, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982 (a) (7), any and all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense charged in Count One of this Information.

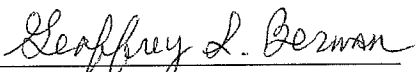
Substitute Assets Provision

4. 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 party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value;
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), Title 21, United States Code, Section 853 (p), and Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
United States Attorney

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