

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal Number:
VALERY RIMERMAN : Title 18, United States Code,
Section 1349

I N F O R M A T I O N

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

Introduction

1. At various times relevant to this Information:

The Defendant and Other Parties

a. Defendant VALERY RIMERMAN was a licensed doctor of medicine in New Jersey and New York. Defendant VALERY RIMERMAN was the sole principal of a professional corporation established under his name that operated out of a medical office located in Elizabeth, New Jersey (hereinafter "Elizabeth Office").

b. Aleksandr Sirota, a co-conspirator not named as a defendant herein, was a resident of New Jersey and the principal owner and operator of TFS Management Services, Inc. (hereinafter "TFS"), which later did business as ADS Management Services, Inc. (hereinafter "ADS"). TFS and ADS were incorporated in New Jersey and provided billing services to medical doctors, including defendant VALERY RIMERMAN. Co-Conspirator Aleksandr Sirota, through TFS and later ADS, submitted claims for payments, medical

records, and other documents to various insurance companies located in New Jersey and elsewhere on behalf of defendant VALERY RIMERMAN's professional medical corporation.

c. Grigory Sirota, a co-conspirator not named as a defendant herein, worked at the Elizabeth Office. Co-Conspirator Grigory Sirota was not a licensed medical professional, and he did not possess any medical license issued by the State of New Jersey.

d. Several companies in New Jersey were engaged in the business of providing automobile insurance to motorists (hereinafter collectively "the victim insurance companies").

Overview of Automobile Insurance & Medical Billing Process

2. Under New Jersey law, any individual who owned a motor vehicle registered in the state was required to maintain liability insurance against losses resulting from death, injury, and property damage arising from use of the motor vehicle. All standard insurance policies in New Jersey included Personal Injury Protection (hereinafter "PIP"). Under PIP, the victim insurance companies were required to pay the necessary and reasonable medical expenses arising from injuries sustained as a result of a motor vehicle collision, regardless of the individual's fault or liability.

3. To obtain PIP payments, the medical professional providing services, or the billing company acting on his or her

behalf, was required to submit to the pertinent insurance company certain documents, including bills and medical records, to support the services provided to the patient. The insurance companies relied on the documents to pay bills submitted on behalf of patients.

The Conspiracy

4. From in or about early 1998 through in or about February 2004, in Union County, in the District of New Jersey and elsewhere, defendant

VALERY RIMERMAN

knowingly and willfully conspired and agreed with Co-Conspirators Aleksandr Sirota, Grigory Sirota, and others to execute a scheme and artifice to defraud health care benefit programs, as defined under Title 18, United States Code, Section 24(b), 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 health care benefit programs, namely, insurance plans provided by victim insurance companies, in connection with the delivery of, and payment for, health care benefits, items, and services, contrary to Title 18, United States Code, Section 1347.

Object of the Conspiracy

5. The object of the conspiracy was for defendant VALERY RIMERMAN and his co-conspirators to unlawfully enrich themselves by submitting and causing to be submitted to the victim insurance

companies materially false and fraudulent bills, medical records, and other documents.

Manner and Means of the Conspiracy

6. It was part of the conspiracy that defendant VALERY RIMERMAN and his co-conspirators falsely billed the victim insurance companies for medical treatments and services that had not actually been provided to patients.

7. It was further part of the conspiracy that Co-Conspirators Aleksandr Sirota and Grigory Sirota billed the victim insurance companies for medical treatments and services that had been provided by unlicensed and unqualified individuals, such as Co-Conspirator Grigory Sirota.

8. It was further part of the conspiracy that defendant VALERY RIMERMAN and his co-conspirators fabricated medical records to induce the victim insurance companies to pay for fraudulent insurance claims and to conceal their scheme and allow it to continue.

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

CHRISTOPHER J. CHRISTIE
United States Attorney