

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

**CRIMINAL COMPLAINT**

v.

CASE NUMBER:

ALONA DIZON BUGAYONG and

**UNDER SEAL**

HAN WOO

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: From in or about November 2009 through in or about January 2010, in the Northern District of Illinois, Eastern Division, ALONA DIZON BUGAYONG and HAN WOO, defendants herein:

did knowingly conspire with each other to knowingly and willfully offer and pay remuneration, directly or indirectly, overtly or covertly, in return for the referral of individuals to a person for the furnishing or arranging of the furnishing of services for which payment may be made in whole and in part under Medicare, in violation of Title 42, United States Code, Section 1320a-7b(b)(2)(A), and in furtherance of and to effect the objects of the conspiracy, on December 7, 2009, defendants met with a representative of a medical clinic and paid the representative \$500 for the referral of a Medicare patient to a home health agency for the provision of home health services;

in violation of Title 18, United States Code, Section 371. I further state that I am a Special Agent with the Department of Health and Human Services, Office of Inspector General, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

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Signature of Complainant  
EDWARD F. LEITELT  
Special Agent, Department of Health and Human Services,  
Office of Inspector General

Sworn to before me and subscribed in my presence,

February 16, 2011 \_\_\_\_\_ at Chicago, Illinois  
Date City and State

JEFFREY COLE, U.S. Magistrate Judge  
\_\_\_\_\_  
Name & Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer