

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

JASWINDER RAI CHHIBBER

UNDER SEAL

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: Beginning no later than February 2009 and continuing through March 2010, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, JASWINDER RAI CHHIBBER defendant herein:

knowingly and intentionally devised and participated in a scheme and artifice to defraud health care benefit programs within the meaning of Title 18, United States Code, Section 24(b) in connection with the delivery of and payment for healthcare benefits and services by submitting medical services reimbursement claims for procedures never rendered and for procedures performed despite not being medically necessary, which scheme is further described in the attached affidavit, and for the purpose of executing the scheme and attempting to do so, caused a materially false and fraudulent medical services reimbursement claim to be presented to Blue Cross Blue Shield of Illinois on or about February 9, 2010;

In violation of Title 18, United States Code, Section 1347.

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.

Office of Inspector General

Signature of Complainant
EDWARD LEITELT
Special Agent, Department of Health and Human Services,

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JASWINDER RAI CHHIBBER

WARRANT FOR ARREST

CASE NUMBER:

UNDER SEAL

To: The United States Marshal
and Any Authorized Officer

YOU ARE HEREBY COMMANDED to arrest JASWINDER RAI CHHIBBER, defendant herein, and bring him forthwith to the nearest Magistrate Judge to answer a

Indictment Information Complaint

charging him with (brief description of offense):

health care fraud

in violation of Title 18, United States Code, Section 1347.

JEFFREY COLE
Name of Issuing Officer

U.S. MAGISTRATE JUDGE
Title of Issuing Officer

Signature of Issuing Officer

February 16, 2011; Chicago, Illinois
Date and Location

Bail fixed at \$ _____

by

JEFFREY COLE
Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at:

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

DEFENDANT'S NAME: Jaswinder Rai Chhibber

ALIAS: _____

LAST KNOWN RESIDENCE: _____

LAST KNOWN EMPLOYMENT: _____

PLACE OF BIRTH: _____

DATE OF BIRTH: _____

SOCIAL SECURITY NUMBER: _____

HEIGHT: _____

WEIGHT: _____

SEX: Male

RACE: _____

HAIR: _____

EYES: _____

SCARS, TATTOOS, OTHER DISTINGUISHING MARKS: _____

FBI NUMBER: _____

COMPLETE DESCRIPTION OF AUTO: _____

INVESTIGATIVE AGENT NAME AND PHONE NUMBER :: Edward Leitelt, (312) 353-5702

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
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UNITED STATES OF AMERICA

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v.

UNDER SEAL

JASWINDER RAI CHHIBBER

**GOVERNMENT'S MOTION TO SEAL
COMPLAINT, AFFIDAVIT, AND ARREST WARRANT**

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal Complaint, Affidavit, and Arrest Warrant:

The public filing of the Complaint, Affidavit, and Arrest Warrant in this matter before the arrest warrant can be executed could alert the defendant and result in his flight.

For this reason, the government respectfully requests that the Complaint, Affidavit, and Arrest Warrant, as well as this Motion to Seal, be sealed until the time of arrest of the defendant in this case or further order of the Court, whichever occurs earlier.

Respectfully submitted,
PATRICK J. FITZGERALD
United States Attorney

By:

Joel M. Hammerman
Assistant United States Attorney
219 S. Dearborn Street, Rm. 500
Chicago, Illinois 60604
(312) 353-8881

DATE: February 16, 2011

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER:

v.

UNDER SEAL

JASWINDER RAI CHHIBBER

ORDER

The UNITED STATES OF AMERICA by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, having moved this Court to Seal the Complaint, Affidavit, Arrest Warrant, and Motion to Seal, and having demonstrated good cause in support of its motion,

IT IS HEREBY ORDERED THAT the Complaint, Affidavit, Arrest Warrant, and Motion to Seal be sealed until the time of arrest of the defendant in this case or further order of the Court, whichever occurs earlier.

ENTER:

JEFFREY COLE
United States Magistrate Judge

DATE: February 16, 2011