

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	
v.	:	Crim. No. 20- 866(MCA)
	:	
GESSICA VARGAS	:	31 U.S.C. §§ 5314, 5322(b);
	:	18 U.S.C. § 2

I N F O R M A T I O N

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

1. At all times relevant to this Information:
 - a. Citizens and residents of the United States who had a financial interest in, or signature authority over, a financial account in a foreign country with an aggregate value of more than \$10,000 at any time during a particular year were required to file with the U.S. Department of Treasury a Report of Foreign Bank and Financial Accounts on FinCEN Form 114 (the "FBAR"). The FBAR for the applicable year was due by June 30 of the following year.
 - b. The FBAR requirement was separate from the obligation of a United States citizen or resident to indicate on the Schedule B of a Form 1040 Federal income tax return whether that individual had an interest in a financial account in a foreign country by checking "Yes" or "No" in the appropriate box.
2. During calendar year 2017, defendant GESSICA VARGAS had a financial interest in, and signature and other authority over, at least one

financial account, having an aggregate value exceeding \$10,000 at Bank A, a bank in the Dominican Republic.

3. From in or about March 2016 through in or about April 9, 2019, GESSICA VARGAS was aware that others had agreed to pay and receive illegal health care kickbacks and bribes.

4. From at least in or about March 2016 through in or about April 9, 2019, GESSICA VARGAS was employed by Company-1, a Delaware limited liability company, and during the course of that employment she was aware that Company-1 accepted illegal health care kickbacks and bribes in exchange for medical professionals' consultations with Medicare beneficiaries to order medically unnecessary orthotic braces and to prescribe medically unnecessary prescription drugs.

5. During the course of this activity, GESSICA VARGAS and others laundered money from the bank account of Company-1 in the United States through the bank account of a company in the Dominican Republic to the bank account of Company-2, a Delaware limited liability company.

6. From in or about March 2016 through in or about April 9, 2019, GESSICA VARGAS and others knowingly engaged, and attempted to engage, in monetary transactions by, through, or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000 and such property having been derived from a specified unlawful activity, that is, conspiracy to defraud the United States and pay and receive

kickbacks relating to a health care benefit program, namely, Medicare, among other things, by wiring or causing to be wired, \$149,850 from Company-1's account in the United States to an account at Bank A in the Dominican Republic on or about May 11, 2017, knowing that the funds were the proceeds of illegal health care kickbacks and bribes, which is a crime against the United States.

7. On or about June 30, 2018, in the District of New Jersey and elsewhere, the defendant,

GESSICA VARGAS,

did willfully and knowingly fail to file with the U.S. Department of the Treasury a Report of Foreign Bank and Financial Account ("FBAR") disclosing that she has a financial interest in, and signature and other authority over, a bank, securities, and other financial account in a foreign country, namely a Dominican bank account at Bank A, which had an aggregate value of more than \$10,000, while violating another law of the United States and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period, as described above.

In violation of Title 31, United States Code, Sections 5314 and 5322(b),
and Title 18, United States Code, Section 2.


RACHAEL A. HONIG
Attorney for the United States,
Acting Under Authority Conferred
By 28 U.S.C. § 515

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