

JN/ABS:MGD
F. #2020R00825

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

VLADIMIR GEYKHMAN,

Defendant.

----- X

INDICTMENT

1:20-cr-00371(AMD)(SJB)

Cr. No.
(T. 18, U.S.C., §§ 982(a)(1),
982(a)(7), 982(b)(1), 1349,
1956(h) and 3551 et seq.; T. 21,
U.S.C., § 853(p))

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. Background

A. The New York State No-Fault Automobile Insurance Program

1. Since 1974, New York State has maintained a “no-fault” liability automobile insurance coverage program (“No-Fault Insurance”) for automobile drivers insured within the state.

2. New York’s No-Fault Insurance law required automobile insurance companies (the “No-Fault Insurers”) to automatically pay automobile insurance claims for certain types of motor vehicle accidents, provided the claims were legitimate and below a particular injury or damages threshold. This process was intended to resolve automobile claims without apportioning blame or fault for the accident, thereby avoiding the costs

associated with an extended investigation of the accident or protracted litigation between the parties and their insurance companies.

3. Under New York's Comprehensive Motor Vehicle Insurance Reparations Act and the regulations promulgated thereto, all automobile insurers operating in the State of New York were required to provide No-Fault Insurance benefits to insured drivers. No-Fault Insurance benefits included up to \$50,000 per insured for necessary expenses that were incurred for health care goods and services, including medical services.

B. The Defendant and Relevant Entities and Individuals

4. The defendant VLADIMIR GEYKHMEN was a resident of the State of New York. GEYKHMEN submitted and caused to be submitted bills to No-Fault Insurers for services purportedly performed within the Eastern District of New York.

5. Co-Conspirator 1, an individual whose identity is known to the Grand Jury, was a physical therapist who was licensed by the State of New York.

6. Company-1, an entity the identity of which is known to the Grand Jury, was a corporation owned by Co-Conspirator 1 that purported to provide medical services to victims of automobile accidents within the Eastern District of New York. Company-1 maintained a bank account at Bank-1, an entity the identify of which is known to the Grand Jury, with an account number ending in 5862 (the "5862 Account"). Co-Conspirator-1 was the sole signatory for the 5862 Account.

7. Insurer-1, an entity the identity of which is known to the Grand Jury, was a No-Fault Insurer that provided No-Fault Insurance to automobile drivers in New York State.

II. The Fraudulent Scheme

A. Conspiracy to Commit Health Care Fraud

8. In or about and between March 2019 and January 2020, the defendant VLADIMIR GEYKHMEN agreed with others, including Co-Conspirator 1, to engage in a fraudulent scheme during which claims for medical services purportedly performed by Co-Conspirator 1 were submitted and caused to be submitted to No-Fault Insurers, including, but not limited to, Insurer-1, even though Co-Conspirator 1 had not in fact performed the medical services.

9. In particular, the defendant VLADIMIR GEYKHMEN, together with others, agreed to submit, and cause the submission of, false and fraudulent claims reflecting that diagnostic testing had been provided to No-Fault Insurance beneficiaries, including, but not limited to, beneficiaries living within the Eastern District of New York, when in fact the testing had not been conducted. Specifically, the claims falsely and fraudulently represented that the diagnostic testing had been provided by Co-Conspirator 1 on behalf of Company-1 when, in fact, Co-Conspirator 1 had not evaluated or even met the No-Fault Insurance beneficiaries on whose behalf such claims were submitted.

10. In order to perpetrate and cover up the fraudulent scheme, the defendant VLADIMIR GEYKHMEN and Co-Conspirator 1, together with others, falsified patient medical records, and caused such records to be falsified, to reflect, among other things, that diagnostic testing had been provided by Co-Conspirator 1, when in fact no such testing had been provided.

B. The Money Laundering Conspiracy

11. In or about and between March 2019 and January 2020, the defendant VLADIMIR GEYKHMAN and Co-Conspirator 1, together with others, conspired to launder the proceeds of the fraudulent scheme.

12. In particular, the defendant VLADIMIR GEYKHMAN directed Co-Conspirator 1 to open the 5862 Account in order to receive the proceeds of the health care fraud scheme described above. Between approximately May 2019 and the present, No-Fault Insurance benefits paid to Company-1 by No-Fault Insurers as a result of the false and fraudulent claims submitted by GEYKHMAN and others were deposited into the 5862 Account by GEYKHMAN and others.

13. The defendant VLADIMIR GEYKHMAN and Co-Conspirator 1 agreed that Co-Conspirator 1 would provide GEYKHMAN with signed blank checks drawn on the 5862 Account. As the proceeds of the fraudulent scheme were paid into Company-1's bank account by the No-Fault Insurers, GEYKHMAN used and caused to be used checks drawn on the 5862 Account, including, but not limited to, signed blank checks provided by Co-Conspirator 1, to transfer the proceeds of the health care fraud scheme to various corporations and to Co-Conspirator 1. These transfers were designed, in whole and in part, to conceal and disguise, among other things, the fraudulent nature of the transferred funds.

14. Certain of the checks written and caused to be written by the defendant VLADIMIR GEYKHMAN exceeded \$10,000 in value.

COUNT ONE

(Conspiracy to Commit Health Care Fraud)

15. The allegations contained in paragraphs one through 14 are realleged and incorporated as if fully set forth in this paragraph.

16. In or about and between March 2019 and January 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant VLADIMIR GEYKHMAN, together with others, did knowingly and willfully conspire to execute a scheme and artifice to defraud various No-Fault Insurers, including, but not limited to, Insurer-1, each of which was a health care benefit program as that term is defined under Title 18, United States Code, Section 24(b), and to obtain, by means of one or more materially false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of, such No-Fault Insurers, in connection with the delivery of and payment for health care benefits, items and services, contrary to Title 18, United States Code, Section 1347.

(Title 18, United States Code, Sections 1349 and 3551, et seq.)

COUNT TWO

(Money Laundering Conspiracy)

17. The allegations contained in paragraphs one through 14 are realleged and incorporated as if fully set forth in this paragraph.

18. In or about and between March 2019 and January 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant VLADIMIR GEYKHMAN, together with others, did knowingly and intentionally conspire to: (a) conduct and attempt to conduct financial transactions affecting interstate

commerce, which transactions involved the proceeds of specified unlawful activity, to wit: conspiracy to commit health care fraud, in violation of Title 18, United States Code, Section 1349, and health care fraud, in violation of Title 18, United States Code, Section 1347, knowing that the property involved in such financial transactions represented the proceeds of some form of unlawful activity, and knowing that such transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and (b) engage and attempt to engage in monetary transactions, in and affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000 and that was derived from specified unlawful activity, to wit: conspiracy to commit health care fraud, in violation of Title 18, United States Code, Section 1349, and health care fraud, in violation of Title 18, United States Code, Section 1347, knowing that the property involved in such monetary transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1957(a) and 1957(b).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

19. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(7), which requires any person convicted of a federal health care offense to forfeit property, real or personal, that constitutes,

or is derived directly or indirectly from, gross proceeds traceable to the commission of such offense.

20. 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; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982(a)(7) and 982(b)(1); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

21. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person

convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property.

22. 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; or
- (e) has been commingled with other property which cannot be

divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any


other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL


FOREPERSON


SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK


DANIEL KAHN
ACTING CHIEF, FRAUD SECTION
CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE

F #: 2020R00825
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

VLADIMIR GEYKHMAN,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 982(a)(1), 982(a)(7), 982(b)(1), 1349, 1956(h) and
3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Miriam L. Glaser Dauermann, Trial Attorney (718) 254-7575

**TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**



**APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL**

United States v. Vladimir Geykhman

1:20-cr-00371(AMD)(SJB)
Docket Number

SUBMITTED BY: Plaintiff ___ Defendant ___ DOJ
Name: Miriam L. Glaser Dauermann
Firm Name: U.S. Attorney's Office for EDNY
Address: 271-A Cadman Plaza East
Brooklyn, NY 11201
Phone Number: (718) 254-7575
E-Mail Address: miriam.glaser@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES ___ NO
If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) ___ A copy of this application either has been or will be promptly served upon all parties to this action, **B.)** ___ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: _____; or **C.)** This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

9/16/2020
DATE

/s Miriam L. Glaser Dauermann
SIGNATURE

A) If pursuant to a prior Court Order:
Docket Number of Case in Which Entered: _____
Judge/Magistrate Judge: _____
Date Entered: _____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

Ongoing criminal investigation; risk of evidence destruction or flight

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

DATED: Brooklyn, NEW YORK
9/16/2020

U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE 9/16/2020
DATE

INDICTMENT SEALING FORM

1:20-cr-00371(AMD)(SJB)

Case name: United States v. Vladimir Geykhman

Reason for Sealing:

The defendant is currently at liberty, and the government plans to effectuate the arrest in the coming weeks. The government seeks to seal the indictment to ensure that the defendant does not learn that he is under indictment and to prevent him fleeing justice to avoid arrest and prosecution. Notably, the indictment has been returned well within the applicable statute of limitations and sealing is not requested simply to toll the statute.

By:

Miriam L. Glaser Dauermann
Trial Attorney
Criminal Division, Fraud Section
United States Department of Justice
271 Cadman Plaza East
Brooklyn, New York 11201

Date: September 16, 2020