

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONALD JOSEPH MATTHEWS,

Defendant.

Case No.: 20CR1933-WQH

I N F O R M A T I O N

Title 18, U.S.C., Sec. 371 -
Conspiracy to Commit an
Offense Against the United
States

The United States Attorney charges:

Beginning in approximately 2012 and continuing up to and including June, 2017, within the Southern District of California, and elsewhere, defendant DONALD JOSEPH MATTHEWS did knowingly and intentionally conspire with others known and unknown to commit offenses against the United States, to wit:

a. to violate the Anti-Kickback Statute by knowingly and willfully soliciting or receiving any remuneration, including any kickback or bribe, directly or indirectly, overtly or covertly, in cash or in kind, in return for purchasing, leasing, ordering, or arranging for or recommending purchasing, leasing, or ordering any good, facility, service, or item for which payment may be made in whole or in part under a Federal health care program, namely the Medicare program, in violation of 42 U.S.C. § 1320a-7b(b)(1)(B); and

1 b. to violate the Anti-Kickback Statute by knowingly and
2 willfully offering or paying remuneration, including any kickback or
3 bribe, directly or indirectly, overtly or covertly, in cash or in kind,
4 to any person to induce the purchase, lease, order, or arrange for or
5 recommend purchasing, leasing, or ordering any good, facility, service,
6 or item for which payment may be made in whole or in part under a
7 Federal health care program, namely the Medicare program, in violation
8 of 42 U.S.C. § 1320a-7b(b) (2) (B); all in violation of 18 U.S.C. § 371.

9

10 DATED: July 7, 2020.

11

ROBERT S. BREWER, JR.
United States Attorney

12

13

/s/ Joseph S. Green
JOSEPH S. GREEN
ANDREW S. GALVIN
Assistant U.S. Attorneys

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28