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**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
FILED

*June 12, 2024*

Nathan Ochsner, Clerk of Court

**UNITED STATES OF AMERICA,**

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**Criminal No.**

v.

**UNDER SEAL**

**4:24-cr-324**

**SVITLANA MEIER,**

**Defendant.**

**INDICTMENT**

THE GRAND JURY CHARGES:

**INTRODUCTION**

At all time material to this Indictment:

1. The Defendant, **SVITLANA MEIER** (“**MEIER**”), was the straw owner of Kim Long Pharmacy, located in Houston, Texas.

2. The Defendant, **MEIER**, individually and through Kim Long Pharmacy, a pharmaceutical business in her name, operated as an unlicensed money transmitting business as outlined in Title 18, United States Code Section 1960(b)(1). An unlicensed money transmitting business affects interstate and foreign commerce in any manner and degree and fails to comply with money transmitting business registration requirements under Title 31, United State Code, Section 5330, and the regulations prescribed under such section, including Title 31, United States code, Sections 1022.100 - 1022.670.

3. The Defendant, **MEIER**, individually and through Kim Long Pharmacy, operated as a money transmitter as outlined in Title 18, United States Code Section 1960(b)(2). Money transmitting includes transferring funds on behalf of the public by any and all means, including

but not limited to, transfer within the United States and to locations abroad by wire, check, draft, facsimile, and courier.

4. A money mule is a person who transfers illegally acquired money on behalf and at the direction of others. Money mules often receive a payment for providing their services.

5. **MEIER** individually and through Kim Long Pharmacy operated as a money mule related to a healthcare fraud scheme in Houston, Texas, in which co-conspirators used Kim Long Pharmacy to bill various healthcare benefit programs for prescriptions that were not medically necessary, not distributed, or both.

6. **MEIER** became the sole signatory of and maintained control of bank accounts within the United States and used the bank account to collect the proceeds from the healthcare fraud scheme committed within Houston, Texas, in the approximate amount of \$4,316,046.45. **MEIER** then transmitted approximately \$3,654,282.09 of the proceeds to accounts in Hong Kong and Singapore at the direction of her co-conspirators.

**COUNT ONE**

(Operating an Unlicensed Money Transmission Business, 18 U.S.C. § 1960)

7. Paragraphs 1 – 7 of the Introduction of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

8. From at least in or around November 2020 and continuing through in or around May 2021 in the Southern District of Texas and elsewhere, the Defendant

**SVITLANA MEIER**

together and with others known and unknown to the Grand Jury, knowingly conducted, controlled, managed, supervised, directed, and owned all and part of an unlicensed money transmitting business, having failed to comply with the money transmitting business registration

requirements under Title 31, United States Code Section 5330, and regulations prescribed under such section.

All in violation of Title 18, United States Code, Section 1960.

**COUNT TWO - FOUR**

(Money Laundering Spending Statute, 18 U.S.C. § 1957, 2)

9. Paragraphs 1 – 7 of the Introduction of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

10. From at least in or about November 2020 up to and including in or about May 2021 in the Southern District of Texas and elsewhere, the defendant,

**SVITLANA MEIER**

together with others known and unknown to the Grand Jury, aiding and abetting each other and others, knowingly engaged and attempted to engage in a monetary transaction in the United States, in criminally derived property of a value greater than \$10,000, as described in the table below, which was derived from specified unlawful activity, that is health care fraud.

COUNT	AMOUNT	DATE	SENDING ACCOUNT	RECEIVING ACCOUNT
2	\$165,000	1/19/2021	Chase Account x2086	Hongkong and Shanghai Banking Corporation (HSBC) SINGAPORE -Account x 3178
3	\$175,000	2/17/2021	Chase Account x2086	HSBC SINGAPORE -Account x 3178
4	\$165,000	3/12/2021	Chase Account x2086	HSBC SINGAPORE -Account x 3178

All in violation of Title 18, United States Code, Section 1957.

**NOTICE OF CRIMINAL FORFEITURE**

**(18 U.S.C. § 982(a)(7); 18 U.S.C. § 981(a)(1)(C))**

Pursuant to Title 18, United States Code, Section 982(a)(7), the United States gives notice that upon Defendant's conviction of any wire fraud offense charged in this Indictment, the United States will seek forfeiture of all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of such offenses.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice that upon Defendant's conviction of wire fraud offenses charged in this Indictment, the United States intends to seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

**MONEY JUDGMENT AND SUBSTITUTE ASSETS**

The United States gives notice that it will seek a money judgment against the Defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the Defendant up to the amount of the money judgment.

A TRUE BILL

**Original Signature on File**

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FOREPERSON

ALAMDAR S. HAMDANI  
United States Attorney  
Southern District of Texas

By: Grace Murphy  
Grace Murphy  
Assistant United States  
Attorney Southern District of  
Texas