

CMM:AT
F. #2023R00762

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

UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18 U.S.C. § 1349)

SAAD AZIZ, and
ZABED CHOWDHURY
also known as “Jared,”

26-MJ-114(SIL)

Defendants.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

RYAN HODKINSON, being duly sworn, deposes and states that he is a Special Agent with the Office of the Inspector General, United States Department of Health and Human Services, duly appointed according to law and acting as such.

On or about and between January 2019 and October 2025, within the Eastern District of New York and elsewhere, the defendants SAAD AZIZ and ZABED CHOWDHURY, also known as “Jared,” together with others, did knowingly and willfully conspire to execute a scheme and artifice to defraud one or more health care benefit programs, as defined in Title 18, United States Code, Section 24(b), to wit: Medicaid, 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 Medicaid, in connection with the delivery of a payment for health care benefits, items and services, contrary to Title 18, United States Code, Section 1347.

(Title 18, United States Code, Section 1349)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Office of the Inspector General, United States Department of Health and Human Services ("OIG-HHS") and have been since 2018. During my career as a Special Agent, I have been involved in the investigation of numerous cases involving healthcare fraud and conspiracy to commit healthcare fraud. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

I. The Medicaid Program

2. The New York State Medicaid program ("Medicaid") was a federal and state health care program providing benefits to individuals and families who met specified financial and other eligibility requirements, and certain other individuals who lacked adequate resources to pay for medical care. The Centers for Medicare & Medicaid Services ("CMS"), a federal agency under the U.S. Department of Health and Human Services ("HHS"), was responsible for overseeing the Medicaid program in participating states, including New York. Individuals who received benefits under Medicaid were referred to as "beneficiaries."

3. Medicaid covered the costs of various medical services and products ranging from routine preventive medical care for children to institutional care for the elderly and disabled. Among the specific medical services provided by Medicaid were ambulette services,

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

which provided beneficiaries with transportation to access medical care in non-emergency situations, including medical appointments.

4. To bill Medicaid, providers were required regularly to certify, among other things, that the claimed services were provided in accordance with applicable federal and state laws and regulations, and that the provider understood that payment of the claims were from federal, state and local public funds.

5. Medical providers and suppliers were authorized to submit claims to Medicaid only for services that were medically necessary, were provided by an authorized provider and were not induced by payment of a kickback, among other requirements.

6. As with other Medicaid providers, to submit claims for reimbursement to Medicaid, ambulette companies were required to apply for enrollment, to be enrolled and to periodically revalidate that enrollment.

7. The Medicaid program was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b), and a “Federal health care program,” as defined by Title 42, United States Code, Section 1320a-7b(f).

II. The Defendants and Relevant Entities

8. Tri-Hamlet Taxi Inc. (“Tri-Hamlet”) was a New York State Corporation located in Shirley, New York.

9. The defendant SAAD AZIZ was a resident of Suffolk County, New York and was the owner and operator of Tri-Hamlet.

10. The defendant ZABED CHOWDHURY, also known as “Jared,” was a resident of Suffolk County, New York, was a manager of Tri-Hamlet.

III. Probable Cause

11. Between approximately January 2019 and October 2025, the defendants SAAD AZIZ and ZABED CHOWDHURY, together with others, agreed to execute and executed schemes to enrich themselves whereby they offered and paid illegal health care kickbacks and submitted and caused to be submitted claims to Medicaid for ambulette services to medical appointments, even though those ambulette services were not performed. In total, the defendants, through Tri-Hamlet, fraudulently billed Medicaid millions of dollars.

12. The defendants SAAD AZIZ and ZABED CHOWDHURY, together with others:

(a) submitted fraudulent claims to Medicaid for transportation services that Tri-Hamlet did not perform;

(b) submitted claims to Medicaid for transportation services that were induced by remuneration to beneficiaries;

(c) submitted fraudulent claims to Medicaid for transportation services whose costs were artificially inflated; and

(d) while receiving reimbursements for transportation services from Medicaid, some of which were never performed at all, paid kickbacks directly to beneficiaries for requesting those transportation services from Tri-Hamlet.

13. The defendants SAAD AZIZ and ZABED CHOWDHURY also submitted claims to Medicaid for purportedly transporting two undercover law enforcement officers who were posing as Medicaid beneficiaries, to certain addiction treatment centers. In reality, the undercover officers were never transported to the addiction treatment centers, never received any

treatment, and were instead paid kickbacks by the defendants, demonstrating that the claimed services were entirely fictitious.

14. As part of their scheme to submit claims to Medicaid for transportation services whose costs were artificially inflated, the defendants SAAD AZIZ and ZABED CHOWDHURY, together with others, instructed Medicaid beneficiaries, including the undercover officers, to list false home addresses (the pickup addresses) as the addresses for which they were purportedly to be picked up. The defendants instructed the beneficiaries to list false addresses which were further away from the addiction treatment centers than their true home addresses so that the rides would be longer distances, and therefore the reimbursement rates would be higher. The defendants also instructed Medicaid beneficiaries to request to receive treatment at the addiction treatment centers, despite that there were many other addiction treatment centers much closer to the Medicaid beneficiaries.

15. As part of their scheme to pay kickbacks directly to the beneficiaries for requesting those transportation services from Tri-Hamlet, the defendants SAAD AZIZ and ZABED CHOWDHURY, together with others, regularly and consistently made cash kickback payments to Medicaid beneficiaries so that those beneficiaries would request transportation services from Tri-Hamlet.

16. Based on records that I have reviewed, the defendant SAAD AZIZ was listed as the corporate officer for Tri-Hamlet on New York State records. He is also listed as the owner of Tri-Hamlet on paperwork that was filed with Medicaid and on bank documentation for a Tri-Hamlet bank account.

17. Based on my knowledge of the investigation, including conversations with the undercover officers, the defendant ZABED CHOWDHURY was the manager of Tri-Hamlet.

CHOWDHURY has corresponded with the undercover officers on behalf of Tri-Hamlet on numerous occasions, and law enforcement has observed CHOWDHURY managing and overseeing operations at the Tri-Hamlet offices on numerous occasions.

18. Approximately weekly between May 2024 and through October 2025, the undercover officers, posing as beneficiaries, were provided by the defendants SAAD AZIZ and ZABED CHOWDHURY and their co-conspirators with envelopes containing hundreds of dollars in cash in exchange for requesting Medicaid-funded rides from Tri-Hamlet. Many of these kickback payments are video-recorded and audio-recorded. The undercover officers were never provided any transportation by Tri-Hamlet. In total, AZIZ and CHOWDHURY and their coconspirators paid the undercover officers were over \$24,000 approximately in kickback payments.

19. An image of one of the envelopes with cash is below in Figure-1

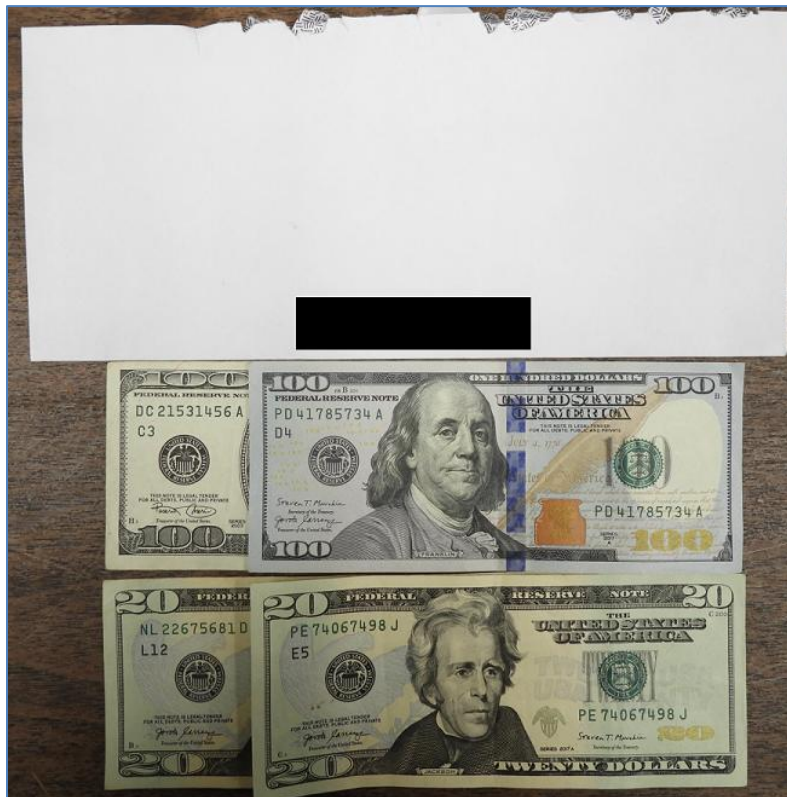


Figure-1²

20. Images of the defendant SAAD AZIZ making a payment to an undercover officer are below in Figure-2 and Figure-3:



Figure-2



Figure-3

21. On that day, the defendant SAAD AZIZ handed an undercover officer three envelopes with hundreds of dollars of cash collectively, on behalf of three beneficiaries that Tri-Hamlet billed for transportation to addiction treatment centers, despite the fact that the undercover officers were never transported to addiction treatment centers by Tri-Hamlet, and despite the fact that paying kickbacks to beneficiaries is illegal.

²

One of the names used by the undercover officers has been redacted.

22. An image of the defendant SAAD AZIZ making another payment to an undercover officer is below in Figure-4:



Figure-4

23. An image of the defendant SAAD AZIZ from his driver license is below in Figure-5:

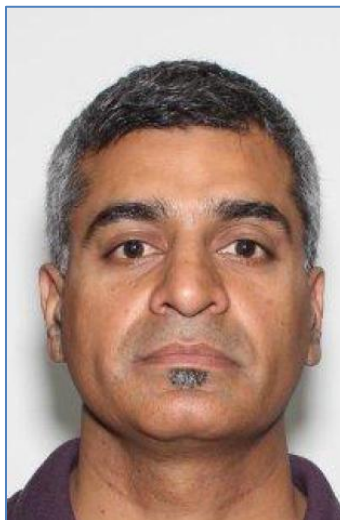


Figure-5

24. The individual in Figure-2, Figure-3, and Figure-4 matches the individual in Figure-5 in several features. An undercover officer also confirmed that the defendant SAAD AZIZ was the individual who had paid the undercover officer on multiple occasions and with whom he discussed the scheme.

25. An image of the defendant ZABED CHOWDHURY making a payment to an undercover officer is below in Figure-6. An image of CHOWDHURY discussing the scheme in detail with the undercover officer is below in Figure-7.



Figure-6



Figure-7

26. On both these occasions and others, the defendant ZABED CHOWDHURY handed the undercover officer an envelope containing cash.

27. An image of the defendant ZABED CHOWDHURY from his driver license is below in Figure-8, which matches the individual in Figure-6 and Figure-7:



Figure-8

28. The undercover officer also confirmed that the defendant ZABED CHOWDHURY was the individual from whom he received cash in an envelope and with whom he discussed the scheme.

29. An undercover officer also texted with the defendant ZABED CHOWDHURY about the illegal kickback payments. CHOWDHURY was listed as “Jarred” in the undercover’s contacts:³

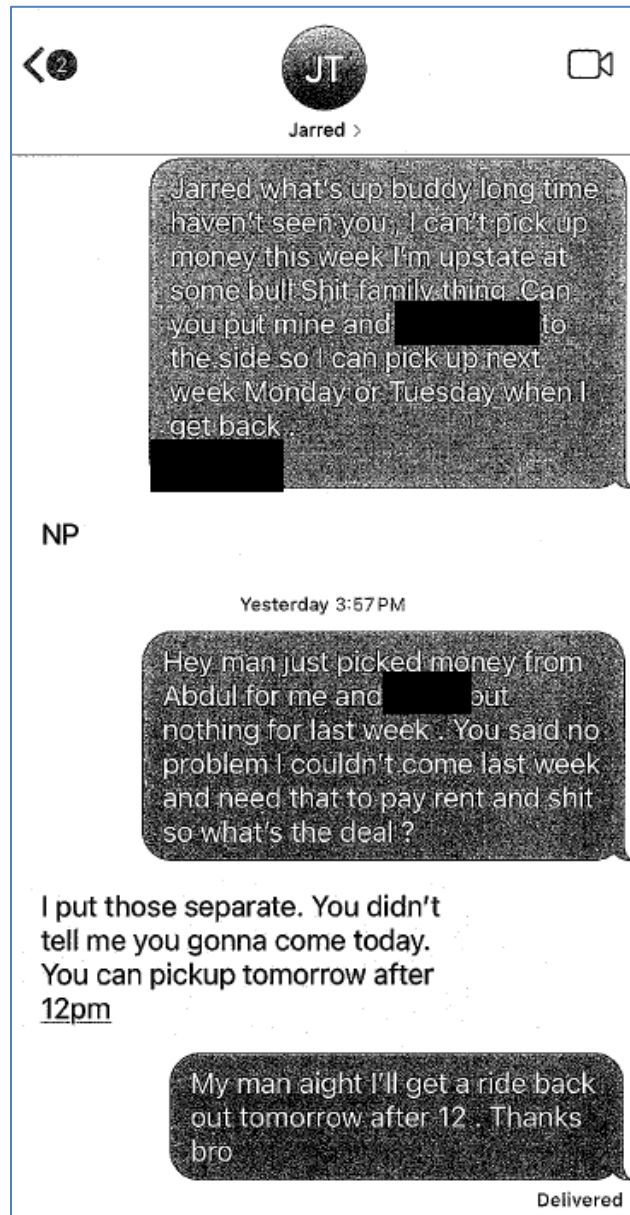


Figure-9

³ This number was also provided by a Tri-Hamlet employee with the contact name as “Zabed”

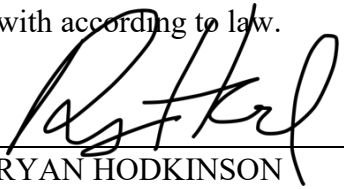
30. In these texts, the defendant ZABED CHOWDHURY was aware that payments were being made to the undercover officers from others at Tri-Hamlet, including “Abdul”.

31. In addition to providing illegal kickback payments to the beneficiaries, the defendants SAAD AZIZ and ZABED CHOWDHURY defrauded Medicaid by claiming that they provided transportation to the beneficiaries when, in fact, they did not provide any services. For example, the undercover officers did not need any medical transportation and were never transported to a treatment facility by a Tri-Hamlet vehicle. Despite that, according to records I have reviewed from the Office of the New York State Comptroller York, Tri-Hamlet routinely billed Medicaid for transportation of the undercover officers.

32. Tri-Hamlet drivers also engaged in ghost rides. For example, law enforcement officers observed Tri-Hamlet drivers on several occasions drive to a location for a pre-scheduled pickup of a beneficiary. The driver arrived at the location, but no individual entered the vehicle. Despite that, the undercover officers observed individuals from Tri-Hamlet, including the defendants SAAD AZIZ and ZABED CHOWDHURY, handing envelopes to individuals routinely, including some of the beneficiaries that were not picked up by Tri-Hamlet drivers when surveilled by law enforcement.

33. From approximately 2018 to 2025, Tri-Hamlet billed for over \$18 million in claims for rides longer than 75 miles, despite the fact that there were addiction treatment centers within 5-10 miles of beneficiaries. Moreover, Tri-Hamlet billed approximately 299 claims for over \$13,000 where the beneficiary and driver had the same name.

WHEREFORE, your deponent respectfully requests that the defendants SAAD AZIZ and ZABED CHOWDHURY be dealt with according to law.



RYAN HODKINSON
Special Agent, United States Department of Health
and Human Services

Sworn to before me this
8th day of June, 2026

/s/ **STEVEN I. LOCKE**

THE HONORABLE STEVEN I. LOCKE
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK