

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 v.)
)
 OMAR A. ALMUSA)

Criminal No. *18-65*
[UNDER SEAL]

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C); 18
U.S.C. §1347)

FILED

MAR 14 2018

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

INDICTMENT

COUNTS ONE THROUGH EIGHTY-SIX

The grand jury charges:

On or about the dates set forth below, in the Western District of Pennsylvania, defendant OMAR A. ALMUSA did knowingly, intentionally and unlawfully dispense and distribute, and cause to be dispensed and distributed, a quantity of hydrocodone and acetaminophen, commonly known as Vicodin, a Schedule II controlled substance, in the name of “R.J.”, “N.A.”, “S.P.” and “H.A.” outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Person
1	08/05/2016	R. J.
2	2/20/2018	N. A.
3	01/30/2018	N. A.
4	01/09/2018	N. A.
5	12/19/2017	N. A.
6	11/27/2017	N. A.
7	11/05/2017	N. A.

8	10/14/2017	N. A.
9	09/22/2017	N. A.
10	07/14/2017	N. A.
11	06/15/2017	N. A.
12	05/25/2017	N. A.
13	05/03/2017	N. A.
14	04/13/2017	N. A.
15	03/22/2017	N. A.
16	03/02/2017	N. A.
17	02/09/2017	N. A.
18	01/19/2017	N. A.
19	12/28/2016	N. A.
20	12/04/2016	N. A.
21	11/12/2016	N. A.
22	10/22/2016	N. A.
23	09/29/2016	N. A.
24	06/14/2016	N. A.
25	09/08/2016	N. A.
26	08/18/2016	N. A.
27	07/28/2016	N. A.
28	07/06/2016	N. A.
29	03/26/2016	N. A.
30	05/27/2016	N. A.

31	04/16/2016	N. A.
32	02/16/2016	N. A.
33	05/04/2016	N. A.
34	03/07/2016	N. A.
35	12/15/2015	N. A.
36	11/24/2015	N. A.
37	10/19/2015	N. A.
38	07/27/2015	N. A.
39	01/05/2016	N. A.
40	01/26/2016	N. A.
41	07/14/2017	S. P.
42	05/30/2017	S. P.
43	04/27/2017	S. P.
44	04/03/2017	S. P.
45	03/03/2017	S. P.
46	02/03/2017	S. P.
47	01/11/2017	S. P.
48	12/06/2017	S. P.
49	11/15/2016	S. P.
50	10/25/2016	S. P.
51	10/04/2016	S. P.
52	09/12/2016	S. P.
53	08/20/2016	S. P.

54	08/01/2016	S. P.
55	07/13/2016	S. P.
56	03/31/2016	S. P.
57	04/22/2016	S. P.
58	05/11/2016	S. P.
59	06/01/2016	S. P.
60	03/09/2016	S. P.
61	11/04/2014	S. P.
62	07/28/2014	S. P.
63	09/24/2014	S. P.
64	12/1/2014	S. P.
65	12/22/2014	S. P.
66	07/28/2014	S. P.
67	01/10/2015	S. P.
68	07/13/2015	S. P.
69	08/19/2015	S. P.
70	03/23/2015	S. P.
71	11/12/2015	S. P.
72	01/30/2015	S. P.
73	12/04/2015	S. P.
74	09/18/2015	S. P.
75	04/14/2015	S. P.
76	06/18/2015	S. P.

77	12/26/2015	S. P.
78	05/06/2015	S. P.
79	10/11/2015	S. P.
80	05/26/2015	S. P.
81	03/01/2015	S. P.
82	02/03/2016	S. P.
83	01/15/2016	S. P.
84	02/24/2016	S. P.
85	12/15/2014	H. A.
86	08/15/2015	N. A.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTY-SEVEN

The grand jury further charges:

From in and around July 2014, and continuing thereafter to in and around March 2018 in the Western District of Pennsylvania, the defendant, OMAR ALMUSA, did knowingly, intentionally and unlawfully conspire with persons known and unknown to the grand jury to distribute a quantity of hydrocodone and acetaminophen, commonly known as Vicodin, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT EIGHTY-EIGHT

The grand jury further charges:

The allegations set forth in Counts One through Eighty-Six of this Indictment are incorporated herein as if set forth in full.

1. At all times material to this Indictment, the UPMC Health Plan was a health care benefit program, as defined in Title 18, United States Code, Section 24(b).

2. Beginning in and around July 2014, and continuing through in and around March, 2018, in the Western District of Pennsylvania and elsewhere, the defendant, OMAR A. ALMUSA, and individuals known and unknown to the grand jury, did participate in a scheme to defraud a health care benefit program, as defined by Title 18, United States Code, Section 24(b), namely UPMC Health Plan, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money under the custody and control of the program in connection with the delivery of and payment for health care benefits and services, which scheme is further described below.

3. It was part of the scheme that the defendant, OMAR A. ALMUSA, prepared and signed prescriptions for Schedule II narcotics outside the usual course of professional practice and not for a legitimate medical purpose. The defendant, OMAR A. ALMUSA, caused these fraudulent and forged prescriptions to be filled in pharmacies by individuals known and unknown to the grand jury.

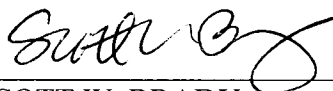
5. As a result of the scheme, the defendant, OMAR A. ALMUSA, caused losses to UPMC Health Plan.

6. From in and around July 2014, and continuing through in and around March, 2018, in the Western District of Pennsylvania and elsewhere, the defendant, OMAR A. ALMUSA, did knowingly and willfully execute the scheme by submitting and causing to be submitted to UPMC

Health Plan, false claims, specifically, claims for payment for prescription narcotics, when in truth and in fact as he well knew, the prescriptions were outside the course of professional practice and not for a legitimate medical purpose.

All in violation of Title 18, United States Code, Section 1347.

A True Bill,



SCOTT W. BRADY
United States Attorney
PA ID No. 88352



FORETERSON