

**FILED**  
JUN 26 2018  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MERIAM REYES,  
Defendant.

Case No. *18 CR 3016 WQH*  
INFORMATION  
Title 18, U.S.C. 371 - Conspiracy

Count 1

From in or around June 2013 through in or around August 2015, in the Southern District of California and elsewhere, defendant Meriam REYES did knowingly conspire with Person A to commit the following offense against the United States: to knowingly and willfully solicit and receive any remuneration (including any kickback, bribe, and rebate) directly and indirectly, overtly and covertly, in cash and in kind, in return for referring an individual to a person for the furnishing and arranging for the furnishing of benefits, items, and services, payment for which was made in whole and in part under a federal health care program, namely, TRICARE. As an overt act of the conspiracy, on or about February 6, 2014, Person A signed and issued

\*:San Diego/Imperial  
6/26/2018


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1 check # 1505, in the amount of \$1,500, written from an account in the  
2 name of Person A's chiropractic business, and payable to REYES, in  
3 exchange for her referral of TRICARE patients to Person A, to be seen  
4 at Person A's businesses.

5 All in violation of Title 18, United States Code, Section 371.

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7 ADAM L. BRAVERMAN  
United States Attorney

8 DATED:

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for VALERIE H. CHU  
Assistant U.S. Attorney

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