CO-DEFENDANT

*** ATTORNEY GENERAL ***

** INFORMATION INDICTMENT RETURN SHEET**

CASE NO.	IR	DEFENDANT	NO.	ARRAIGNMENT DATE
26CR0655201		Amro T Abdel-Fattah	001	06/29/2026

GJ- 2305

FBI-
SEX: [redacted] RACE: DOB: [redacted]

ISB-
Add: [redacted]

Municipal-

CB- **PRINT AT ARR** Arrest Agy: **NO ARREST**

RD/AR- Arrest Unit:

Arrest Date:

DL State: IL DL#: [redacted]

Hgt: Wgt:

Hair: Eyes:

True Bill 06/10/2026
AAG: Dan Duffy

001 THEFT >$100K/SCHOOL/WORSHIP
720 ILCS 5/16-1(a)(1)(A)
0012598 Class: X
002 THEFT >$100K/SCHOOL/WORSHIP
720 ILCS 5/16-1(a)(2)(A)
0012614 Class: X
003 THEFT/CONTROL/INTENT >$1M
720 ILCS 5/16-1(a)(1)(A)
0014988 Class: X
004 THEFT/DECEPTION/INTENT >$1M
720 ILCS 5/16-1(a)(2)(A)
0014997 Class: X
005 CONSPIRACY(THEFT >$100K/SCHOOL/WORSHIP)
720 ILCS 8-2/(16-1(a)(1)(A))
C0012598 Class: 1
006 "DEFRAUD HEALTH PLAN >$10,000"
305 ILCS 5/8A-13(b)(1)
0011565 Class: 1
007 VENDOR FRD/FALSE STMT $10000+
305 ILCS 5/8A-3(a)
0010236 Class: 1
008 FORGERY/MAKE/ALTER DOCUMENT
720 ILCS 5/17-3(a)(1)
1080000 Class: 3

FILED
29 JUN 17 PM 12:16
CLERK OF THE CIRCUIT COURT
COOK COUNTY, IL

009 FORGERY/ISSUE/DELIVER DOCUMENT
720 ILCS 5/17-3(a)(2)
1080100 Class: 3

***

CO-DEFENDANT: 26CR0655101 MOHAMMAD KHAMIS

CA

FILED.
26 JUN 17 PM 12:17
MARIYANA T SPYROPOULOS
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY

CO-DEFENDANT

*** ATTORNEY GENERAL ***

G.J. NO. 2305
GENERAL NO. 26CR0655201

CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT
CRIMINAL DIVISION
MAY 2026

The People of the State of
Illinois
v.

Amro T Abdel-Fattah

INDICTMENT FOR

THEFT

A TRUE BILL

[redacted]

Foreman of the Grand Jury

WITNESS

[redacted]

ORIGINAL
FILE COPY
DO NOT REMOVE

Filed June 17, 2026
Mariyana T Spyropoulos / D.R, Clerk
Bail $

FILED
26 JUN 17 PM 12:12
MARIYANA T SPYROPOULOS
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

The MAY 2026 Grand Jury of the
Circuit Court of Cook County,

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY EXERTED UNAUTHORIZED CONTROL OVER GOVERNMENTAL PROPERTY OF THE UNITED STATES GOVERNMENT AND STATE OF ILLINOIS, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE HUNDRED THOUSAND DOLLARS ($100,000.00) OR MORE, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(1)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 1
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0012598

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY OBTAINED BY DECEPTION, CONTROL OVER GOVERNMENTAL PROPERTY OF THE UNITED STATES GOVERNMENT AND STATE OF ILLINOIS, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE HUNDRED THOUSAND DOLLARS ($100,000.00) OR MORE, IN THAT THE DEFENDANT SUBMITTED FALSE CLAIMS TO ILLINOIS DEPARTMENT OF HUMAN SERVICES TO AUTHORIZE PAYMENTS TO THE DEFENDANT, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(2)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 2
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0012614

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY EXERTED UNAUTHORIZED CONTROL OVER PROPERTY OF A STATE FUNDED OR MANDATED HEALTH PLAN, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE MILLION DOLLARS ($1,000,000.00) OR MORE, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(1)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 3
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0014988

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023, AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY OBTAINED BY DECEPTION, CONTROL OVER PROPERTY OF A STATE FUNDED OR MANDATED HEALTH PLAN, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE MILLION DOLLARS ($1,000,000.00) OR MORE, IN THAT THE DEFENDANT SUBMITTED FALSE CLAIMS TO ILLINOIS MEDICAID MANAGED CARE PROGRAMS CAUSING THE ILLINOIS MEDICAID MANAGED CARE PROGRAMS TO AUTHORIZE PAYMENTS TO THE DEFENDANT, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(2)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 4
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0014997

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of CONSPIRACY TO COMMIT THEFT

IN THAT THE DEFENDANT, WITH THE INTENT TO COMMIT THE OFFENSE OF THEFT OF GOVERNMENT PROPERTY, AGREED WITH MOHAMMAD KHAMIS TO THE COMMISSION OF THAT OFFENSE, AND THE DEFENDANT OR HIS CO-CONSPIRATOR, MOHAMMED KHAMIS, COMMITTED AN ACT IN FURTHERANCE OF THAT AGREEMENT, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY OBTAINED BY DECEPTION, CONTROL OVER GOVERNMENTAL PROPERTY OF THE UNITED STATES GOVERNMENT AND STATE OF ILLINOIS, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE HUNDRED THOUSAND DOLLARS ($100,000.00) OR MORE, IN THAT IN THAT DEFENDANT, HIS CO-CONSPIRATOR, OR THOSE WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY, SUBMITTED OR CAUSED TO BE SUBMITTED TO ILLINOIS DEPARTMENT OF HUMAN SERVICES AND U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, CLAIMS CONTAINING FALSE ENTRIES FOR PHARMACEUTICAL PRESCRIPTIONS THAT WERE NOT RENDERED AND/OR NOT LEGALLY PRESCRIBED, WHICH AUTHORIZED PAYMENTS TO THE CO-CONSPIRATOR AND HIS ENTITIES,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(2)(A) AND CHAPTER 720, SECTION 5/8-2(a) AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 5
CASE NUMBER 26CR0655201
CHARGE ID CODE: C0012598

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of MANAGED HEALTH CARE FRAUD

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY EXECUTED OR CONSPIRED TO EXECUTE A SCHEME OR ARTIFICE TO DEFRAUD ANY STATE OR FEDERALLY FUNDED OR MANDATED HEALTH PLANS, IN CONNECTION WITH THE DELIVERY OF OR PAYMENT FOR PHARMACEUTICAL PRESCRIPTIONS, CAUSING SAID HEALTH PLAN TO AUTHORIZE PAYMENTS UNDER THE ILLINOIS PUBLIC AID CODE TO DEFENDANT TO WHICH DEFENDANT WAS NOT ENTITLED OR IN A GREATER AMOUNT THAN THAT TO WHICH DEFENDANT WAS ENTITLED, HAVING A VALUE OF TEN THOUSAND DOLLARS ($10,000.00) OR MORE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 305, SECTION 5/8A-13(b)(1), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 6
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0011565

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of VENDOR FRAUD

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023, AND WITHIN THE STATUTE OF LIMITATIONS, WILLFULLY, BY MEANS OF FALSE STATEMENTS AND REPRESENTATIONS, SUBMITTED FALSE CLAIMS FOR PHARMACEUTICAL PRESCRIPTIONS TO THE ILLINOIS DEPARTMENT OF HUMAN SERVICES AND THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES TO OBTAIN PAYMENTS UNDER THE PUBLIC AID CODE TO WHICH HE WAS NOT ENTITLED, AND BASED ON SAID FALSE CLAIMS, ILLINOIS DEPARTMENT OF HUMAN SERVICES AND U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES AUTHORIZED PAYMENTS TO ENTITIES DOING BUSINESS AS LUNA PHARMACY, HAVING A VALUE IN EXCESS OF TEN THOUSAND DOLLARS ($10,000.00) OR MORE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 305, SECTION 5/8A-3(a), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 7
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0010236

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of FORGERY

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN, WITH THE INTENT TO DEFRAUD, KNOWINGLY MADE FALSE DOCUMENTS APPARENTLY CAPABLE OF DEFRAUDING ANOTHER, ILLINOIS DEPARTMENT OF HUMAN SERVICES AND ILLINOIS MEDICAID MANAGED CARE PROGRAMS, TO WIT: CLAIMS CONTAINING FALSE ENTRIES FOR PHARMACEUTICAL PRESCRIPTIONS THAT WERE NOT RENDERED AND/OR NOT LEGALLY PRESCRIBED, KNOWING THE DOCUMENTS HAD BEEN THUS MADE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/17-3(a)(1), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 8
CASE NUMBER 26CR0655201
CHARGE ID CODE: 1080000

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of FORGERY

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN, WITH THE INTENT TO DEFRAUD, KNOWINGLY DELIVERED FALSE DOCUMENTS APPARENTLY CAPABLE OF DEFRAUDING ANOTHER, ILLINOIS DEPARTMENT OF HUMAN SERVICES AND ILLINOIS MEDICAID MANAGED CARE PROGRAMS, TO WIT: CLAIMS CONTAINING FALSE ENTRIES FOR PHARMACEUTICAL PRESCRIPTIONS THAT WERE NOT RENDERED AND/OR NOT LEGALLY PRESCRIBED, KNOWING THE DOCUMENTS TO HAVE BEEN THUS MADE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/17-3(a)(2), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 9
CASE NUMBER 26CR0655201
CHARGE ID CODE: 1080100



CO-DEFENDANT

*** ATTORNEY GENERAL ***

G.J. NO. 2305
GENERAL NO. 26CR0655201

CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT
CRIMINAL DIVISION
MAY 2026

The People of the State of
Illinois
v.

Amro T Abdel-Fattah

INDICTMENT FOR

THEFT

[redacted]

Foreman of the Grand Jury

WITNESS

[redacted]

Filed _____, 20___

_____, Clerk

Bail $ _____

COPY

FILED
26 JUN 17 PM 12:17
MARIYANA T SPYROPOULOS
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY



STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

The MAY 2026 Grand Jury of the
Circuit Court of Cook County,

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY EXERTED UNAUTHORIZED CONTROL OVER GOVERNMENTAL PROPERTY OF THE UNITED STATES GOVERNMENT AND STATE OF ILLINOIS, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE HUNDRED THOUSAND DOLLARS ($100,000.00) OR MORE, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(1)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 1
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0012598

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY OBTAINED BY DECEPTION, CONTROL OVER GOVERNMENTAL PROPERTY OF THE UNITED STATES GOVERNMENT AND STATE OF ILLINOIS, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE HUNDRED THOUSAND DOLLARS ($100,000.00) OR MORE, IN THAT THE DEFENDANT SUBMITTED FALSE CLAIMS TO ILLINOIS DEPARTMENT OF HUMAN SERVICES TO AUTHORIZE PAYMENTS TO THE DEFENDANT, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(2)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 2
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0012614

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY EXERTED UNAUTHORIZED CONTROL OVER PROPERTY OF A STATE FUNDED OR MANDATED HEALTH PLAN, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE MILLION DOLLARS ($1,000,000.00) OR MORE, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(1)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 3
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0014988

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of THEFT

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023, AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY OBTAINED BY DECEPTION, CONTROL OVER PROPERTY OF A STATE FUNDED OR MANDATED HEALTH PLAN, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE MILLION DOLLARS ($1,000,000.00) OR MORE, IN THAT THE DEFENDANT SUBMITTED FALSE CLAIMS TO ILLINOIS MEDICAID MANAGED CARE PROGRAMS CAUSING THE ILLINOIS MEDICAID MANAGED CARE PROGRAMS TO AUTHORIZE PAYMENTS TO THE DEFENDANT, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(2)(A), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 4
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0014997

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of CONSPIRACY TO COMMIT THEFT

IN THAT THE DEFENDANT, WITH THE INTENT TO COMMIT THE OFFENSE OF THEFT OF GOVERNMENT PROPERTY, AGREED WITH MOHAMMAD KHAMIS TO THE COMMISSION OF THAT OFFENSE, AND THE DEFENDANT OR HIS CO-CONSPIRATOR, MOHAMMED KHAMIS, COMMITTED AN ACT IN FURTHERANCE OF THAT AGREEMENT, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AND AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY OBTAINED BY DECEPTION, CONTROL OVER GOVERNMENTAL PROPERTY OF THE UNITED STATES GOVERNMENT AND STATE OF ILLINOIS, SAID PROPERTY BEING UNITED STATES CURRENCY HAVING A TOTAL VALUE EXCEEDING ONE HUNDRED THOUSAND DOLLARS ($100,000.00) OR MORE, IN THAT IN THAT DEFENDANT, HIS CO-CONSPIRATOR, OR THOSE WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, WITH THE INTENT TO PERMANENTLY DEPRIVE THE STATE OF ILLINOIS OF THE USE OR BENEFIT OF SAID PROPERTY, SUBMITTED OR CAUSED TO BE SUBMITTED TO ILLINOIS DEPARTMENT OF HUMAN SERVICES AND U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, CLAIMS CONTAINING FALSE ENTRIES FOR PHARMACEUTICAL PRESCRIPTIONS THAT WERE NOT RENDERED AND/OR NOT LEGALLY PRESCRIBED, WHICH AUTHORIZED PAYMENTS TO THE CO-CONSPIRATOR AND HIS ENTITIES,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/16-1(a)(2)(A) AND CHAPTER 720, SECTION 5/8-2(a) AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 5
CASE NUMBER 26CR0655201
CHARGE ID CODE: C0012598

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of MANAGED HEALTH CARE FRAUD

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023 AND WITHIN THE STATUTE OF LIMITATIONS, KNOWINGLY EXECUTED OR CONSPIRED TO EXECUTE A SCHEME OR ARTIFICE TO DEFRAUD ANY STATE OR FEDERALLY FUNDED OR MANDATED HEALTH PLANS, IN CONNECTION WITH THE DELIVERY OF OR PAYMENT FOR PHARMACEUTICAL PRESCRIPTIONS, CAUSING SAID HEALTH PLAN TO AUTHORIZE PAYMENTS UNDER THE ILLINOIS PUBLIC AID CODE TO DEFENDANT TO WHICH DEFENDANT WAS NOT ENTITLED OR IN A GREATER AMOUNT THAN THAT TO WHICH DEFENDANT WAS ENTITLED, HAVING A VALUE OF TEN THOUSAND DOLLARS ($10,000.00) OR MORE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 305, SECTION 5/8A-13(b)(1), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 6
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0011565

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of VENDOR FRAUD

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN TO OBTAIN PROPERTY OF A SINGLE OWNER, AT LEAST ONE OF THE ACTS OCCURRED AFTER JUNE 10, 2023, AND WITHIN THE STATUTE OF LIMITATIONS, WILLFULLY, BY MEANS OF FALSE STATEMENTS AND REPRESENTATIONS, SUBMITTED FALSE CLAIMS FOR PHARMACEUTICAL PRESCRIPTIONS TO THE ILLINOIS DEPARTMENT OF HUMAN SERVICES AND THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES TO OBTAIN PAYMENTS UNDER THE PUBLIC AID CODE TO WHICH HE WAS NOT ENTITLED, AND BASED ON SAID FALSE CLAIMS, ILLINOIS DEPARTMENT OF HUMAN SERVICES AND U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES AUTHORIZED PAYMENTS TO ENTITIES DOING BUSINESS AS LUNA PHARMACY, HAVING A VALUE IN EXCESS OF TEN THOUSAND DOLLARS ($10,000.00) OR MORE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 305, SECTION 5/8A-3(a), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 7
CASE NUMBER 26CR0655201
CHARGE ID CODE: 0010236

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of FORGERY

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN, WITH THE INTENT TO DEFRAUD, KNOWINGLY MADE FALSE DOCUMENTS APPARENTLY CAPABLE OF DEFRAUDING ANOTHER, ILLINOIS DEPARTMENT OF HUMAN SERVICES AND ILLINOIS MEDICAID MANAGED CARE PROGRAMS, TO WIT: CLAIMS CONTAINING FALSE ENTRIES FOR PHARMACEUTICAL PRESCRIPTIONS THAT WERE NOT RENDERED AND/OR NOT LEGALLY PRESCRIBED, KNOWING THE DOCUMENTS HAD BEEN THUS MADE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/17-3(a)(1), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 8
CASE NUMBER 26CR0655201
CHARGE ID CODE: 1080000

The Grand Jurors chosen, selected and sworn, in and for the County of Cook, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 08, 2019 and continuing on through April 04, 2025 at and within the County of Cook

Amro T Abdel-Fattah

committed the offense of FORGERY

IN THAT THE DEFENDANT, OR FOR WHOSE CONDUCT HE IS LEGALLY RESPONSIBLE, THROUGH A SERIES OF ACTS PERFORMED IN FURTHERANCE OF A SINGLE INTENTION AND DESIGN, WITH THE INTENT TO DEFRAUD, KNOWINGLY DELIVERED FALSE DOCUMENTS APPARENTLY CAPABLE OF DEFRAUDING ANOTHER, ILLINOIS DEPARTMENT OF HUMAN SERVICES AND ILLINOIS MEDICAID MANAGED CARE PROGRAMS, TO WIT: CLAIMS CONTAINING FALSE ENTRIES FOR PHARMACEUTICAL PRESCRIPTIONS THAT WERE NOT RENDERED AND/OR NOT LEGALLY PRESCRIBED, KNOWING THE DOCUMENTS TO HAVE BEEN THUS MADE,

IN VIOLATION OF THE ILLINOIS COMPILED STATUTES, CHAPTER 720, SECTION 5/17-3(a)(2), AND

contrary to the Statute and against the peace and dignity of the same People of the State of Illinois.

COUNT NUMBER 9
CASE NUMBER 26CR0655201
CHARGE ID CODE: 1080100

