UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

UNITED STATES OF AMERICA

INFORMATION

v.

NO. 3:24-cr-76-RGJ

18 U.S.C. § 2
18 U.S.C. § 982
18 U.S.C. § 1349
18 U.S.C. § 1957

SHAFI ABBAS

The United States Attorney charges:

COUNT 1
(*Conspiracy to Commit Health Care Fraud*)

On or about and between November 26, 2019, and continuing through January 1, 2024, in the Western District of Kentucky, Oldham County, Kentucky, and elsewhere, the defendant, **SHAFI ABBAS**, did knowingly and willfully combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1347, that is, to knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud health care benefit programs and to obtain, by means of false or fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of health care benefit programs, in connection with the delivery of, and payment for, health care benefits, items, and services, to wit: **SHAFI ABBAS**, through Aidmen Medical Equipment LLC and Justright Medical Equipment LLC, fraudulently billed Medicare for Durable Medical Equipment (DME) which was medically unnecessary, unwanted by patients, and not prescribed by the patients' medical providers. As a result of the fraudulent scheme, Medicare was billed for $2,695,021.03 and paid $1,333,722.21 for the DME.

In violation of Title 18, United States Code, Section 1349.

The United States Attorney further charges:

COUNTS 2-4
(*Money Laundering*)

On or about the dates listed below, in the Western District of Kentucky, Oldham County, Kentucky, and elsewhere, the defendant, **SHAFI ABBAS**, aided and abetted by others, known and unknown to the Grand Jury, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived property of a value greater than $10,000, when **SHAFI ABBAS** transferred funds, which came from specified unlawful activity, that is, health care fraud in violation of 18 U.S.C. § 1347 as described in Count 1, in the amounts set forth below:

COUNT	DATE TRANSFERED	TRANSFERED FROM	TRANSFERED TO	AMOUNT
2	August 23, 2020	Aidmen Medical Equipment LLC (JP Morgan Chase account #xxxxx7268)	Unknown account holder at Allied Bank Limited, Karachi, Pakistan	$12,965.00
3	December 7, 2020	Aidmen Medical Equipment LLC (Stock Yards account #xxxxx2044)	Justright Medical Equipment LLC (Stock Yards account #xxxxx1730)	$15,000.00
4	January 17, 2023	Justright Medical Equipment LLC (Stock Yards account #xxxxx1730)	SNS Inc. (Royal Bank of Canada unknown account #)	$11,200.00

In violation of Title 18, United States Code, Sections 1957(a) and 2.

NOTICE OF FORFEITURE

If convicted of a violation of Title 18, United States Code, Section 1349, the defendant, **SHAFI ABBAS**, shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of any such violation. Also, if convicted of a violation of Title 18, United States Code, Section 1957, the defendant, **SHAFI ABBAS**, shall forfeit any property involved in, used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

Pursuant to Title 18, United States Code, Sections 982(a)(1) and (7).

MICHAEL A. BENNETT
UNITED STATES ATTORNEY

MAB:JRA

UNITED STATES OF AMERICA v. **SHAFI ABBAS**

P E N A L T I E S

Count 1:	NM 10 yrs/$250,000 fine/both/NM 3 yrs. Supervised Release
Counts 2-4:	NM 10 yrs/$250,000 fine/both/NM 3 yrs. Supervised Release (each count)
Forfeiture	

N O T I C E

ANY PERSON CONVICTED OF AN OFFENSE AGAINST THE UNITED STATES SHALL BE SUBJECT TO SPECIAL ASSESSMENTS, FINES, RESTITUTION & COSTS.

SPECIAL ASSESSMENTS

18 U.S.C. § 3013 requires that a special assessment shall be imposed for each count of a conviction of offenses committed after November 11, 1984, as follows:

Misdemeanor:	$ 25 per count/individual $125 per count/other	Felony:	$100 per count/individual $400 per count/other

FINES

In addition to any of the above assessments, you may also be sentenced to pay a fine. Such fine is due immediately unless the court issues an order requiring payment by a date certain or sets out an installment schedule. You shall provide the United States Attorney's Office with a current mailing address for the entire period that any part of the fine remains unpaid, or you may be held in contempt of court. 18 U.S.C. § 3571, 3572, 3611, 3612

Failure to pay fine as ordered may subject you to the following:

1. **INTEREST** and **PENALTIES** as applicable by law according to last date of offense.

   For offenses occurring after December 12, 1987:

   No **INTEREST** will accrue on fines under $2,500.00.

   INTEREST will accrue according to the Federal Civil Post-Judgment Interest Rate in effect at the time of sentencing. This rate changes monthly. Interest accrues from the first business day following the two week period after the date a fine is imposed.

   PENALTIES of:

   10% of fine balance if payment more than 30 days late.

   15% of fine balance if payment more than 90 days late.

2. Recordation of a **LIEN** shall have the same force and effect as a tax lien.

3. Continuous **GARNISHMENT** may apply until your fine is paid.

18 U.S.C. §§ 3612, 3613

If you **WILLFULLY** refuse to pay your fine, you shall be subject to an **ADDITIONAL FINE** of not more than the greater of $10,000 or twice the unpaid balance of the fine; or **IMPRISONMENT** for not more than 1 year or both. 18 U.S.C. § 3615

RESTITUTION

If you are convicted of an offense under Title 18, U.S.C., or under certain air piracy offenses, you may also be ordered to make restitution to any victim of the offense, in addition to, or in lieu of any other penalty authorized by law. 18 U.S.C. § 3663

APPEAL

If you appeal your conviction and the sentence to pay your fine is stayed pending appeal, the court shall require:

1. That you deposit the entire fine amount (or the amount due under an installment schedule during the time of your appeal) in an escrow account with the U.S. District Court Clerk, or

2. Give bond for payment thereof.

18 U.S.C. § 3572(g)

PAYMENTS

If you are ordered to make payments to the U.S. District Court Clerk's Office, certified checks or money orders should be made payable to the Clerk, U.S. District Court and delivered to the appropriate division office listed below:

LOUISVILLE:	Clerk, U.S. District Court 106 Gene Snyder U.S. Courthouse 601 West Broadway Louisville, KY 40202 502/625-3500
BOWLING GREEN:	Clerk, U.S. District Court 120 Federal Building 241 East Main Street Bowling Green, KY 42101 270/393-2500
OWENSBORO:	Clerk, U.S. District Court 126 Federal Building 423 Frederica Owensboro, KY 42301 270/689-4400
PADUCAH:	Clerk, U.S. District Court 127 Federal Building 501 Broadway Paducah, KY 42001 270/415-6400

If the court finds that you have the present ability to pay, an order may direct imprisonment until payment is made.