

FILED

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JUL 11 2017 PX

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

vs.

MUNAVVAR IZHAR

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) Case No.
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17CR 464

) Violation:

Title 42, United States
Code, Section 1320a-
7b(1)(A)

JUDGE ELLIS

MAGISTRATE JUDGE MASON

INFORMATION

The UNITED STATES DEPARTMENT OF JUSTICE charges that:

1. Medicare was a federal health care program, as defined in Title 42, United States Code, Section 1320a-7b, that provided health benefits which were funded directly, in whole or in part by the United States Government.

2. On or about July 12, 2012, in the Northern District of Illinois, Eastern Division, and elsewhere,

MUNAVVAR IZHAR,

defendant herein, knowingly and willfully solicited and received, directly and indirectly, overtly and covertly, remuneration from an individual, specifically \$500 in cash, in return for defendant IZHAR referring patients to a home health agency for the furnishing and arranging for the furnishing of a service for which payment may be made in whole and in part under a Federal health care program, namely Medicare;

In violation of Title 42, United States Code, Section 1320a-7b(b)(1)(A).

FORFEITURE ALLEGATIONS

The UNITED STATES DEPARTMENT OF JUSTICE further charges that:

1. The allegations contained above in this Indictment are incorporated here for the purpose of alleging forfeiture to the United States of America of certain property pursuant to Title 18, United States Code, Section 982(a)(7).

2. As a result of his violation of Title 42, United States Code, Section 1320a-7b(b)(1)(A), as alleged in this Indictment,

MUNAVVAR IZHAR,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any and all right, title and interest he may have in any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, which is property subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(7).

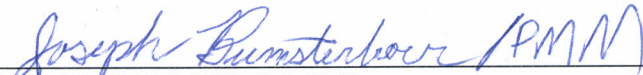
3. If any of the property described above, as a result of any act or omission of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of the Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty;

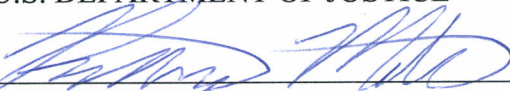
the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

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SANDRA MOSER, ACTING CHIEF
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE

 PMN

JOSEPH BEEMSTERBOER
DEPUTY CHIEF
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE



PATRICK MOTT
TRIAL ATTORNEY
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE