

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

17-20069

Plaintiff

v.

D-1 HAFIZ TAHIR,
D-2 TASNEEM TAHIR,
D-3 HODA SABBAGH a/k/a DONNA HAMADANI,
D-4 KIM ROBINSON,
D-5 ANTONIO KHO, and
D-6 EMMA KING

VIO: 18 U.S.C. § 1349
18 U.S.C. § 1347
18 U.S.C. § 371
18 U.S.C. § 2
18 U.S.C. § 982

Defendants.

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

FILED
CLERK'S OFFICE

JUN 27 2017

U.S. DISTRICT COURT
EASTERN MICHIGAN

General Allegations

At all times relevant to this First Superseding Indictment:

The Medicare Program

1. The Medicare program (Medicare) was a federal health care program providing benefits to persons who were over the age of 65 or disabled. Medicare was administered by the Centers for Medicare and Medicaid Services (CMS), a federal agency under the United States Department of Health and Human Services.

Individuals who received benefits under Medicare were referred to as Medicare “beneficiaries.”

2. Medicare was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b).

3. Medicare included coverage under different components, including hospital insurance (Part A) and medical insurance (Part B). Part A covered physical therapy, occupational therapy, and skilled nursing services if a facility was certified by CMS as meeting certain requirements. Part B covered the cost of physicians’ services and other ancillary services not covered by Part A. The physical therapy, occupational therapy, physicians’ services, and other services at issue in this First Superseding Indictment were covered by Part A and Part B.

4. Payments to the Medicare program were often made directly to a provider of the goods and services, rather than to a beneficiary.

5. Health care providers could submit claims to Medicare only for medically necessary services that they rendered. Medicare regulations required health care providers to maintain complete and accurate patient medical records to verify that the services were provided as described in the claim. These records were required to be sufficient to permit Medicare, through its contractors, to review the appropriateness of Medicare payments made to the healthcare provider.

6. National Government Services was the CMS intermediary for Medicare Part A in Michigan. Wisconsin Physicians Service was the CMS contracted carrier for Medicare Part B, which included home visits, in Michigan. TrustSolutions, LLC was the program safeguard contractor for Medicare Part A and Part B in Michigan until April 24, 2012, when it was replaced by Cahaba Safeguard Administrators LLC (Cahaba). On April 10, 2015, AdvanceMed replaced Cahaba as the program safeguard contractor.

7. By becoming a participating provider in Medicare, enrolled providers agreed to abide by the policies, procedures, rules, and regulations governing reimbursement. In order to receive Medicare funds, enrolled providers, together with their authorized agents, employees, and contractors, were required to abide by all provisions of the Social Security Act, the regulations promulgated under the Social Security Act, and applicable policies, procedures, rules, and regulations issued by CMS and its authorized agents and contractors, including the anti-kickback statute.

8. Upon certification, the medical provider, whether a clinic or an individual, was assigned a provider identification number (PIN) for billing purposes. When the medical provider rendered a service, the provider submitted a claim for reimbursement to the Medicare contractor/carrier that included the PIN assigned to that medical provider. When an individual medical provider was associated with a

clinic, Medicare Part B required that the individual provider's PIN be placed on the claim submitted to the Medicare contractor.

9. Health care providers were given and provided with online access to Medicare manuals and services bulletins describing proper billing procedures and billing rules and regulations.

10. To receive reimbursement for a covered service from Medicare, a provider was required to submit a claim, either electronically or using a form (*e.g.*, a CMS-1500 or UB-92) containing the required information appropriately identifying the provider, patient, and services rendered.

11. A home health agency was an entity that provided health services, including but not limited to skilled nursing, physical and occupational therapy, and speech pathology services to homebound patients.

The Home Health Agencies

12. Alpha Home Care Services, Inc. (Alpha), was a Michigan corporation doing business at 28820 Southfield Road, Suite 220, Lathrup Village, MI 48078. Alpha was a home health agency that purportedly provided in-home physical therapy, skilled nursing, and other services to patients. Alpha was a Medicare provider and submitted claims to Medicare.

13. Al-Hoda Home Healthcare Services, Inc. (Al-Hoda), was a Michigan corporation doing business at 24001 Southfield Road, Suite 213, Southfield, MI

48075. Al-Hoda was a home health agency that purportedly provided in-home physical therapy, skilled nursing, and other services to patients. Al-Hoda was a Medicare provider and submitted claims to Medicare.

14. Patient Home Healthcare Services, Inc. d/b/a Urgent Homecare, Inc. (Urgent), was a Michigan corporation doing business at 28860 Southfield Road, Suite 261, Lathrup Village, MI 48078. Urgent was a home health agency that purportedly provided in-home physical therapy, skilled nursing, and other services to patients. Urgent was a Medicare provider and submitted claims to Medicare.

15. Nexus Home Healthcare Holdings, LLC (Nexus), was a Michigan corporation doing business at 24505 North Cromwell Drive, Suite 1, Franklin, Michigan 48025. Nexus was a home health agency that purportedly provided in-home physical therapy, skilled nursing, and other services to patients. Nexus was a Medicare provider and submitted claims to Medicare.

The Defendants

16. HAFIZ TAHIR, a resident of Wayne County, Michigan, was a licensed physical therapist, owned Alpha, and was employed at Al-Hoda, Urgent, and Nexus.

17. TASNEEM TAHIR, a resident of Wayne County, Michigan, owned Urgent and was employed at Alpha.

18. HODA SABBAGH, a resident of Oakland County, Michigan, owned Al-Hoda and Nexus.

19. KIM ROBINSON was a resident of Wayne County, Michigan.

20. ANTONIO KHO was a resident of Oakland County, Michigan.

21. EMMA KING was a resident of Wayne County, Michigan.

Count 1

18 U.S.C. § 1349

Conspiracy to Commit Health Care Fraud and Wire Fraud

**D-1 HAFIZ TAHIR
D-2 TASNEEM TAHIR
D-3 HODA SABBAGH
D-4 KIM ROBINSON
D-5 ANTONIO KHO
D-6 EMMA KING**

22. Paragraphs 1 through 21 of the General Allegations section of this First Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

23. From in or around December 2009, continuing through the Present, the exact dates being unknown to the Grand Jury, in Wayne County and Oakland County in the Eastern District of Michigan and elsewhere, defendants HAFIZ TAHIR, TASNEEM TAHIR, HODA SABBAGH, KIM ROBINSON, ANTONIO KHO, and EMMA KING did willfully and knowingly combine, conspire, confederate, and agree with each other and others, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

(a) to violate Title 18, United States Code, Section 1347, that is, to execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services; and

(b) to violate Title 18, United States Code, Section 1343, that is, to knowingly and with the intent to defraud devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice.

Purpose of the Conspiracy

24. The purpose of the conspiracy was for defendants HAFIZ TAHIR, TASNEEM TAHIR, HODA SABBAGH, KIM ROBINSON, ANTONIO KHO, and

EMMA KING, and others, to unlawfully enrich themselves by, among other things, (a) submitting and causing the submission of false and fraudulent claims to Medicare for home health and physician services on behalf of Alpha, Al-Hoda, Urgent, and Nexus; (b) offering, paying, soliciting, and receiving kickbacks and bribes for the purpose of arranging for the use of Medicare beneficiary information as the basis of claims submitted on behalf of Alpha, Al-Hoda, Urgent, and Nexus; and (c) diverting proceeds of the fraud for the personal use and benefit of the defendants and their co-conspirators in the form of compensation and other remunerations.

Manner and Means

25. The manner and means by which the defendants and their co-conspirators sought to accomplish the purpose of the conspiracy included, among other things, the following:

26. In or around January 2006, July 2010, September 2011, January 2013, October 2013, December 2014, May 2016, and June 2016, HAFIZ TAHIR certified to Medicare, on behalf of Alpha, that he would comply with all Medicare rules and regulations, including that he would not knowingly present or cause to be presented a false or fraudulent claim for payment by Medicare and would refrain from violating the federal anti-kickback statute.

27. In or around April 2014, August 2016, and October 2016, TASNEEM TAHIR certified to Medicare, on behalf of Urgent, that she would comply with all

Medicare rules and regulations, including that she would not knowingly present or cause to be presented a false or fraudulent claim for payment by Medicare and would refrain from violating the federal anti-kickback statute.

28. In or around January 2011, February 2011, March 2012, April 2012, April 2013, March 2014, and April 2014, HODA SABBAGH certified to Medicare, on behalf of Al-Hoda, that she would comply with all Medicare rules and regulations, including that she would not knowingly present or cause to be presented a false or fraudulent claim for payment by Medicare and would refrain from violating the federal anti-kickback statute.

29. In or around November 2015, HODA SABBAGH certified to Medicare, on behalf of Nexus, that she would comply with all Medicare rules and regulations, including that she would not knowingly present or cause to be presented a false or fraudulent claim for payment by Medicare and would refrain from violating the federal anti-kickback statute.

30. HAFIZ TAHIR, TASNEEM TAHIR, and others paid and caused the payment of kickbacks and bribes to KIM ROBINSON, EMMA KING, and others in the form of cash in exchange for referring Medicare beneficiaries and providing Medicare beneficiary information that was later used to support false and fraudulent claims to Medicare for purported home health care on behalf of Alpha, Al-Hoda, Urgent, and Nexus.

31. HAFIZ TAHIR, TASNEEM TAHIR, KIM ROBINSON, ANTONIO KHO, EMMA KING, and others paid and caused the payment of kickbacks and bribes to Medicare beneficiaries in exchange for their signatures on blank medical records used to support claims submitted on behalf of Alpha, Al-Hoda, Urgent, and Nexus for home health services that were not medically necessary and not provided.

32. HAFIZ TAHIR, TASNEEM TAHIR, HODA SABBAGH, KIM ROBINSON, ANTONIO KHO, EMMA KING, and others falsified, fabricated, altered, and caused the falsification, fabrication, and alteration of medical records, including, but not limited to, home health certifications and plans of care, therapy visit notes, nursing visit notes, evaluations, re-certifications, and discharges, of Alpha, Al-Hoda, Urgent, and Nexus, to support claims to Medicare for home health care services that were obtained through kickbacks and bribes, that were medically unnecessary, and that were never provided.

33. HAFIZ TAHIR, TASNEEM TAHIR, HODA SABBAGH, and others submitted and caused the submission through interstate wires false and fraudulent claims to Medicare for home health care and other physician services purportedly provided by Alpha, Al-Hoda, Urgent, and Nexus in an amount exceeding \$9,000,000.

All in violation of Title 18, United States Code, Section 1349.

Count 2
18 U.S.C. § 371
Conspiracy to Pay and Receive Health Care Kickbacks

D-1 HAFIZ TAHIR
D-2 TASNEEM TAHIR
D-4 KIM ROBINSON
D-5 ANTONIO KHO
D-6 EMMA KING

34. Paragraphs 1 through 21 and 25 through 33 of this First Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

35. From in or around December 2009 through the Present, the exact dates being unknown to the Grand Jury, in Wayne County and Oakland County, in the Eastern District of Michigan, and elsewhere, defendants HAFIZ TAHIR, TASNEEM TAHIR, KIM ROBINSON, ANTONIO KHO, EMMA KING, and others, did willfully and knowingly combine, conspire, confederate, and agree with others, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

(a) to violate Title 42, United States Code, Section 1320a-7b(b)(2)(A) by knowingly and willfully offering or paying any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind in return for referring an individual to a person for the furnishing or arranging for the furnishing of any item or service for which

payment may be made in whole or in part by Medicare, a Federal health care program as defined in Title 18, United States Code, Section 24(b); and

(b) to violate Title 42, United States Code, Section 1320a-7b(b)(1)(A) by knowingly and willfully soliciting or receiving any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind in return for referring an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part by Medicare, a Federal health care program as defined in Title 18, United States Code, Section 24(b).

Purpose of the Conspiracy

36. It was a purpose of the conspiracy for HAFIZ TAHIR, TASNEEM TAHIR, KIM ROBINSON, ANTONIO KHO, EMMA KING, and others to unlawfully enrich themselves by (1) offering, paying, soliciting, and receiving kickbacks and bribes in return for referring Medicare beneficiaries to Alpha, Al-Hoda, Urgent, and Nexus to serve as patients; and (2) submitting and causing the submission of false and fraudulent claims to Medicare for home health services that Alpha, Al-Hoda, Urgent, and Nexus purported to provide to these recruited beneficiaries.

Manner and Means

37. The manner and means by which the defendants and their co-conspirators sought to accomplish the purpose of the conspiracy included, among other things, the following:

38. HAFIZ TAHIR, TASNEEM TAHIR, KIM ROBINSON, ANTONIO KHO, EMMA KING, and others paid and caused the payment of kickbacks and bribes in exchange for Medicare beneficiary referrals to Alpha, Al-Hoda, Urgent, and Nexus.

39. HAFIZ TAHIR, TASNEEM TAHIR, KIM ROBINSON, ANTONIO KHO, EMMA KING, and others submitted and caused the submission of claims to Medicare through Alpha, Al-Hoda, Urgent, and Nexus for home health care services that were purportedly provided to the recruited beneficiaries.

40. Medicare paid Alpha, Al-Hoda, Urgent, and Nexus based upon claims for home health services purportedly provided to Medicare beneficiaries.

Overt Acts

41. In furtherance of the conspiracy, and to accomplish its purpose and objects, at least one of the conspirators committed and caused to be committed, in the Eastern District of Michigan, at least one of the following overt acts, among others:

42. On or about October 7, 2016, HAFIZ TAHIR paid and caused the payment of a forty dollar cash kickback to Medicare beneficiary R.H. in exchange for R.H.'s Medicare beneficiary information.

43. On or about February 10, 2015, TASNEEM TAHIR, paid a \$2,000 cash kickback to V.W. in exchange for V.W. referring Medicare beneficiaries to Alpha and Urgent.

44. On or about November 16, 2016, KIM ROBINSON paid a cash kickback to Medicare beneficiary P.K. in exchange for P.K.'s Medicare beneficiary information.

45. On or about May 27, 2016, ANTONIO KHO paid and caused the payment of a fifty dollar cash kickback to Medicare beneficiary R.H. in exchange for R.H.'s Medicare beneficiary information.

46. On or about May 27, 2016, ANTONIO KHO paid and caused the payment of a one hundred dollar cash kickback to Medicare beneficiary L.H. in exchange for L.H.'s Medicare beneficiary information.

47. On or about January 25, 2017, EMMA KING provided a Medicare beneficiary's information to HAFIZ TAHIR via text message in exchange for a cash kickback.

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

Counts 3-10
18 U.S.C. §§ 1347 and 2
Health Care Fraud

D-1 HAFIZ TAHIR
D-2 TASNEEM TAHIR
D-3 HODA SABBAGH
D-4 KIM ROBINSON
D-6 EMMA KING

48. Paragraphs 1 through 21 and 25 through 33 of this First Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

49. On or about the dates enumerated below, in Wayne County and Oakland, in the Eastern District of Michigan, and elsewhere, HAFIZ TAHIR, TASNEEM TAHIR, HODA SABBAGH, KIM ROBINSON, and EMMA KING, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of Medicare.

Purpose of the Scheme and Artifice

50. It was the purpose of the scheme and artifice for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a)

submitting and causing the submission of false and fraudulent claims to Medicare; (b) concealing the submission of false and fraudulent claims to Medicare; (c) receiving and transferring fraud proceeds; and (d) diverting fraud proceeds for the personal use and benefit of themselves and others.

The Scheme and Artifice

51. The allegations contained in paragraphs 25 through 33 of the Manner and Means section of Count 1 of this First Superseding Indictment are realleged and incorporated as though fully set forth herein as a description of the scheme and artifice.

Acts in Execution of the Scheme and Artifice

52. On or about the dates specified as to each count below, in Wayne County, in the Eastern District of Michigan, and elsewhere, the defendants, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice to defraud a health care benefit program affecting commerce, that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money, and property owned by, and under the custody and control of said healthcare benefit program.

Count	Defendant	Medicare Beneficiary	Provider	Approximate Dates of Service for Episode of Home Health Care	Approximate Claim Submission Date	Amount Paid by Medicare
3	D-1 HAFIZ TAHIR	L.H.	Alpha	October 19, 2015 – December 3, 2015	February 10, 2016	\$3,751.71
4	D-2 TASNEEM TAHIR	J.I.	Urgent	July 7, 2014 – September 2, 2014	September 17, 2014	\$3,843.17
5	D-2 TASNEEM TAHIR	P.K.	Urgent	December 11, 2014 – January 30, 2015	February 24, 2015	\$3,757.58
6	D-3 HODA SABBAGH	T.H.	Nexus	August 15, 2016 – September 15, 2016	October 6, 2016	\$3,408.67
7 D-4	D-1 HAFIZ TAHIR and D-5 KIM ROBINSON	KIM ROBINSON	Alpha	March 20, 2014 – May 18, 2014	May 30, 2014	\$3,613.15
8 D-4	D-2 TASNEEM TAHIR and D-5 KIM ROBINSON	KIM ROBINSON	Urgent	April 11, 2016 – May 13, 2016	June 14, 2016	\$2,754.31
9	D-1 HAFIZ TAHIR and D-6 EMMA KING	EMMA KING	Alpha	May 25, 2015 – July 2, 2015	August 12, 2015	\$3,250.41
10	D-2 TASNEEM TAHIR and D-6 EMMA KING	EMMA KING	Urgent	March 2, 2016 – April 30, 2016	May 24, 2016	\$3,501.57

In violation of Title 18, United States Code, Sections 1347 and 2.

Forfeiture Allegations

(18 U.S.C. § 982(a)(7) and/or 18 U.S.C. § 981 with 28 U.S.C. § 2461)

53. The above allegations contained in this First Superseding Indictment are incorporated by reference as if set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(7) and/or 18 U.S.C. § 981 with 28 U.S.C. § 2461.

54. As a result of the violations of 18 U.S.C. §§ 371, 1347, and/or 42 U.S.C. § 1320a-7b, as set forth in this First Superseding Indictment, defendants HAFIZ TAHIR, TASNEEM TAHIR, HODA SABBAGH, KIM ROBINSON, ANTONIO KHO, and EMMA KING, shall forfeit to the United States any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of such violations, pursuant to 18 U.S.C. § 982(a)(7).

55. As a result of the violations of 18 U.S.C. § 1349, as set forth in this First Superseding Indictment, defendants HAFIZ TAHIR, TASNEEM TAHIR, HODA SABBAGH, KIM ROBINSON, ANTONIO KHO, and EMMA KING, shall forfeit to the United States any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations, pursuant to 18 U.S.C. § 981 with 28 U.S.C. § 2461.

56. Money Judgment: Such property includes, but is not limited to, forfeiture money judgments in an amount to be proved in this matter, representing

the total amount of proceeds and/or gross proceeds obtained as a result defendants' violations, as alleged in this First Superseding Indictment.

57. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek to forfeit any other property of the defendants up to the value of the forfeitable property described above.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson

Grand Jury Foreperson

DANIEL L. LEMISCH
ACTING U.S. ATTORNEY

s/WAYNE F. PRATT

WAYNE F. PRATT

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Date: June 27, 2017

ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 17-cr-20069
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: R.S.

Case Title: USA v. Hafiz Tahir, et al.FILED
CLERK'S OFFICECounty where offense occurred : Wayne County, Oakland County

JUN 27 2017

Check One: ☒ Felony☐ MisdemeanorU.S. DISTRICT COURT
EASTERN MICHIGAN☐ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**Superseding to Case No: 17-cr-20069Judge: Hon. Marianne O. Battani

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	Charges	Prior Complaint (if applicable)
D-1 HAFIZ TAHIR, D-2 TASNEEM TAHIR, D-3	18 USC § 1349, 18 USC	
HODA SABBAGH a/k/a DONNA HAMADANI,	§ 1347, 18 USC § 371, 18	
D-4 KIM ROBINSON, D-5 ANTONIO KHO, and	USC § 2, 18 USC § 982	
D-6 EMMA KING		

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 27, 2017

Date

Rebecca Szucs

Rebecca Szucs, Trial Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.