

---

---

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

**CRIMINAL COMPLAINT**

v.

CASE NUMBER:

DIKE AJIRI and  
BANIO KOROMA

**UNDER SEAL**

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief:

**Count One**

Beginning no later than 2007 and continuing until the present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, DIKE AJIRI, defendant herein:

did knowingly and willfully participate in a scheme to defraud a health care benefit program, namely, Medicare, and to obtain money owned by and under the custody and control of Medicare by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care benefits, items, and services, and, in execution of the scheme, on or about June 26, 2013, did knowingly submit and cause to be submitted a false claim, specifically, a claim that a May 24, 2013 visit by a Mobile Doctors physician with Patient LC was complicated in nature,

in violation of Title 18, United States Code, Section 1347.

**Count Two**

On or about June 27, 2012, Chicago, in the Northern District of Illinois, Eastern Division, BANIO KOROMA, defendant herein:

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter involving a health care benefit program in connection with the payment for home care benefits and services, namely, a statement that Patient SM was confined to her home and required home health services on a Home Health Certification and Plan of Care Form ordering such services for Patient SM from on or about June 13, 2012 through on or about August 11, 2012,

in violation of Title 18, United States Code, Section 1035.

I further state that I am a Special Agent with the Department of Health and Human Services, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

\_\_\_\_\_  
Signature of Complainant  
RAUL SESE  
Special Agent, Department of Health and Human Services

Sworn to before me and subscribed in my presence,

August 26, 2013 at Chicago, Illinois  
Date City and State

MARY M. ROWLAND, U.S. Magistrate Judge  
Name & Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer

DATE: August 26, 2013