

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 11-
 :
 PATRICK LYNCH : 18 U.S.C. § 1347
 : 18 U.S.C. § 1028A
 : 18 U.S.C. § 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE

(Health Care Fraud - 18 U.S.C. § 1347)

From in or about November 2008 through in or about February 2010, in Ocean County, in the District of New Jersey, and elsewhere, defendant

PATRICK LYNCH

did knowingly and intentionally devise a scheme and artifice (1) to defraud a health care benefit program, and (2) to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services.

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

COUNT TWO

(Aggravated Identity Theft - 18 U.S.C. § 1028A)

From in or about November 2008 through in or about February 2010, in Ocean County, in the District of New Jersey, and elsewhere, defendant

PATRICK LYNCH

did knowingly and willfully transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, a name and government issued identification number, during and in relation to a felony violation of a provision contained in Chapter 63, United States Code, to wit, the devising of a scheme and artifice to defraud a health care benefit program, in violation of Title 18, United States Code, Section 1347, as charged more specifically in Count One of this Information.

In violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.



PAUL J. FISHMAN
UNITED STATES ATTORNEY