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**UNDER SEAL**

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

Case No: 13-cr-00138-SI

INDICTMENT

\*UNDER SEAL\*

UNITED STATES OF AMERICA,

v.

JASON I. BOUTROS,  
ZAKIA M. BOUTROS,  
KILLDA I. BOUTROS,  
ISKANDER N. BOUTROS,  
aka: Iskander Nokola Botrus,

Defendants.

18 U.S.C. § 1035  
(False Statement Related to Health Care)

18 U.S.C. § 1349  
(Wire Fraud Conspiracy)

42 U.S.C. § 1383a(a)(3)  
(Social Security Fraud)

18 U.S.C. § 981(a)(1)(C)  
28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

**THE GRAND JURY CHARGES:**

COUNT 1

[Conspiracy to Commit Wire Fraud]

Introduction

1. The Social Security Administration is a department and agency of the United States, with headquarters located in Baltimore, Maryland.

2. At all times material and relevant herein, Supplemental Security Income was a needs-based, welfare benefit, funded by the United States Treasury and administered by the Social Security Administration.

3. At all times material and relevant herein, Supplemental Nutrition Assistance Program (SNAP) benefits, also known as "food stamps", were a needs-based, welfare benefit, funded by the United States Department of Agriculture in accordance with the Food Stamps Act of 1977, and administered by the Oregon Department of Human Services (DHS).

4. At all times material and relevant herein, Medicaid was the United States health care program for certain people and families with low incomes and resources. Medicaid is a needs-based program that is jointly funded by state and federal government and is managed in Oregon by DHS. When a beneficiary is approved to receive Supplementary Security Income (SSI), they are automatically eligible for Medicaid coverage.

#### **General Allegations**

5. At all times material to this Indictment, defendants **KILLDA BOUTROS** and **JASON BOUTROS** were residents of the state and District of Oregon.

6. At all times material to this Indictment, defendants **ZAKIA BOUTROS** and **ISKANDER BOUTROS** resided in Oregon when they were not residing outside the United States.

#### **The Conspiracy To Commit Wire Fraud**

7. Beginning in or about March 2002, and continuing through August 2011, in the District of Oregon and elsewhere, defendants **JASON BOUTROS, ZAKIA BOUTROS,**

**KILLDA BOUTROS** and **ISKANDER BOUTROS** did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the grand jury, to devise and intend to devise a material scheme and artifice to defraud the Social Security Administration and the Oregon Department of Human Services, and to obtain money and property by means of material false and fraudulent pretenses, representations, promises, and omissions, by knowingly transmitting and causing to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such material scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1349.

**Manner and Means Of The Conspiracy**

8. It was part of the material scheme and artifice to defraud that defendants **ZAKIA BOUTROS, ISKANDER BOUTROS,** and V.B. would apply for Supplemental Security Income (SSI) benefits through the Social Security Administration (SSA).

9. It was part of the material scheme and artifice to defraud that defendants **JASON BOUTROS** and **KILLDA BOUTROS** would apply to be the Representative Payee for V.B.'s SSI benefits.

10. It was part of the material scheme and artifice to defraud that defendants **ZAKIA BOUTROS** and **ISKANDER BOUTROS** would fail to advise SSA that they were frequently residing outside the United States for more than 30 days.

11. It was part of the material scheme and artifice to defraud that defendants **JASON BOUTROS** and **KILLDA BOUTROS** would fail to advise SSA that V.B. was frequently

residing outside the United States for more than 30 days.

12. It was part of the material scheme and artifice to defraud that defendants **JASON BOUTROS, ZAKIA BOUTROS, KILLDA BOUTROS, and ISKANDER BOUTROS** would direct that the SSI benefits be electronically deposited to various Bank of America accounts.

13. It was part of the material scheme and artifice to defraud that defendants **ZAKIA BOUTROS, ISKANDER BOUTROS** and V.B. would apply for and receive SNAP benefits and Medicaid coverage.

14. It was part of the material scheme and artifice to defraud that defendant **ZAKIA BOUTROS** would return to the United States to obtain medical treatment and to renew her SNAP benefits and would fail to advise DHS or SSA that she had resided outside the United States for more than 30 days and that she did not intend to remain in the United States.

15. In furtherance of the conspiracy, and to accomplish its object, at least one of the conspirators committed, or caused to be committed, in the District of Oregon, the following acts, among others:

16. Between July 1, 1997, and December 1, 1997, defendant **ISKANDER BOUTROS** applied for and was deemed to be eligible for SSI benefits and was advised by SSA of his reporting duties and responsibilities.

17. Between November 13, 2002, and May 27, 2003, defendant **ZAKIA BOUTROS** applied for and was deemed to be eligible for SSI benefits, and was advised by SSA of her reporting duties and responsibilities.

18. In or between March 2002, and April 2005, as part of the material scheme and

artifice to defraud, defendant **ISKANDER BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ISKANDER BOUTROS** failed to advise the Social Security Administration that he had resided outside of the United States for more than 30 days.

19. In or between April 19, 2005, and July 1, 2005, defendants **JASON BOUTROS**, **ZAKIA BOUTROS**, and **ISKANDER BOUTROS** directed SSA to deposit SSI benefits in various Bank of America accounts.

20. In or between April 26, 2005, and June 26, 2010, as part of the material scheme and artifice to defraud, defendant **ISKANDER BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ISKANDER BOUTROS** failed to advise the Social Security Administration that he had resided outside of the United States for more than 30 days.

21. In or between November 8, 2005, and July 29, 2006, as part of the material scheme and artifice to defraud, defendant **ZAKIA BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ZAKIA BOUTROS** failed to advise the Social Security Administration that she had resided outside of the United States for more than 30 days.

22. On or about September 28, 2006, defendant **KILLDA BOUTROS** applied to be the Representative Payee for V.B.'s SSI benefits and was advised by SSA of her reporting duties and responsibilities.

23. On or before November 1, 2006, defendant **KILLDA BOUTROS** advised SSA to deposit SSI funds on behalf of V.B. in a Bank of America bank account.

24. In or between December 29, 2007, and October 6, 2008, as part of the material

scheme and artifice to defraud, V.B. remained outside of the United States. During that time, and thereafter, defendant **KILLDA BOUTROS** failed to advise the Social Security Administration that V.B. had resided outside of the United States for more than 30 days.

25. In or between November 2006, and February 2009, defendant **KILLDA BOUTROS** withdrew SSI funds intended for V.B. from a Bank of America bank account in Oregon.

26. In or between December 29, 2007, and October 6, 2008, as part of the material scheme and artifice to defraud, defendant **ZAKIA BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ZAKIA BOUTROS** failed to advise the Social Security Administration that she had resided outside of the United States for more than 30 days.

27. On or about January 20, 2009, defendant **JASON BOUTROS** applied to be the Representative Payee for V.B.'s benefits and was advised by SSA of his reporting duties and responsibilities.

28. In or between February 19, 2009, and February 10, 2010, as part of the material scheme and artifice to defraud, V.B. remained outside of the United States. During that time, and thereafter, defendant **JASON BOUTROS** failed to advise the Social Security Administration that V.B. had resided outside of the United States for more than 30 days.

29. In or between July 2005, and February 2010, defendant **JASON BOUTROS** withdrew SSI funds intended for **ZAKIA BOUTROS, ISKANDER BOUTROS,** and V.B., from various Bank of America bank accounts in Oregon.

30. In or between February 19, 2009, and May 29, 2009, as part of the material scheme and artifice to defraud, defendant **ZAKIA BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ZAKIA BOUTROS** failed to advise the Social Security Administration that she had resided outside of the United States for more than 30 days.

31. On or about March 31, 2009, defendants **JASON BOUTROS** and **ZAKIA BOUTROS** caused to be submitted to DHS a voucher for payment for home-care provider services, when defendants **JASON BOUTROS** and **ZAKIA BOUTROS** knew that the services were not provided.

32. In or between June 23, 2009, and September 22, 2009, as part of the material scheme and artifice to defraud, defendant **ZAKIA BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ZAKIA BOUTROS** failed to advise the Social Security Administration that she had resided outside of the United States for more than 30 days.

33. In or between October 5, 2009, and February 10, 2010, as part of the material scheme and artifice to defraud, defendant **ZAKIA BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ZAKIA BOUTROS** failed to advise the Social Security Administration that she had resided outside of the United States for more than 30 days.

34. In or between May 7, 2010, and September 21, 2010, as part of the material scheme and artifice to defraud, defendant **ZAKIA BOUTROS** remained outside of the United States. During that time, and thereafter, defendant **ZAKIA BOUTROS** failed to advise the

Social Security Administration that she had resided outside of the United States for more than 30 days.

35. On or about July 7, 2010, defendant **JASON BOUTROS** fraudulently used defendant **ZAKIA BOUTROS'** and V.B.'s SNAP benefits while defendant **ZAKIA BOUTROS** and V.B. were outside the United States.

36. On or about November 5, 2010, defendant **ZAKIA BOUTROS** attempted to conceal from SSA her and V.B.'s travel outside the United States.

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

**COUNT 2**  
[Social Security Fraud]

In or about March 2002, and continuing through August 2011, within the District of Oregon, **ISKANDER BOUTROS**, defendant herein, in a matter within the jurisdiction of the Social Security Administration, having knowledge of the occurrence of an event affecting the continued right to Supplemental Security Income (SSI) payments, knowingly concealed and failed to disclose such event to the Social Security Administration with the intent to fraudulently secure SSI benefit payments in an amount greater than was due and when no payment to him was authorized. Specifically, defendant **ISKANDER BOUTROS**, failed to disclose that he was frequently outside the United States for more than 30 days, all in violation of Title 42, United States Code, Section 1383a(a)3.

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**COUNT 3**  
[Social Security Fraud]

In or about November 2002, and continuing through March 2011, within the District of Oregon, **ZAKIA BOUTROS**, defendant herein, in a matter within the jurisdiction of the Social Security Administration, having knowledge of the occurrence of an event affecting the continued right to Supplemental Security Income (SSI) payments, knowingly concealed and failed to disclose such event to the Social Security Administration with the intent to fraudulently secure SSI benefit payments in an amount greater than was due and when no payment to her was authorized. Specifically, defendant **ZAKIA BOUTROS**, failed to disclose that she was frequently outside the United States for more than 30 days, all in violation of Title 42, United States Code, Section 1383a(a)3.

**COUNT 4**  
[Social Security Fraud]

In or about September 2006, and continuing through February 2009, within the District of Oregon, **KILLDA BOUTROS**, defendant herein, in a matter within the jurisdiction of the Social Security Administration, having knowledge of the occurrence of an event affecting the continued right to Supplemental Security Income (SSI) payments on behalf of V.B., knowingly concealed and failed to disclose such event to the Social Security Administration with the intent to fraudulently secure SSI benefit payments in an amount greater than was due and when no payment to her was authorized. Specifically, defendant **KILLDA BOUTROS**, failed to disclose that V.B. was frequently outside the United States for more than 30 days, all in violation of Title 42, United States Code, Section 1383a(a)3.

**COUNT 5**  
[Social Security Fraud]

In or about March 2009, and continuing through February 2010, within the District of Oregon, **JASON BOUTROS**, defendant herein, in a matter within the jurisdiction of the Social Security Administration, having knowledge of the occurrence of an event affecting the continued right to Supplemental Security Income (SSI) payments on behalf of V.B., knowingly concealed and failed to disclose such event to the Social Security Administration with the intent to fraudulently secure SSI benefit payments in an amount greater than was due and when no payment to him was authorized. Specifically, defendant **JASON BOUTROS**, failed to disclose that V.B. was frequently outside the United States for more than 30 days, all in violation of Title 42, United States Code, Section 1383a(a)3.

**COUNT 6**  
[False Statement Relating to Health Care]

On or about April 1, 2009, **JASON BOUTROS**, defendant herein, in a matter involving a health care benefit program, knowingly and willfully made a materially false statement in connection with the delivery of payment for health care benefits, to wit: by representing to the Oregon Department of Human Services that he had provided home-care provider services to defendant **ZAKIA BOUTROS**; all in violation of Title 18, United States Code, Section 1035.

**FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in Count 1 of this indictment, **JASON BOUTROS, ZAKIA BOUTROS, KILLDA BOUTROS, and ISKANDER BOUTROS,**

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said violation.

If any of the above-described forfeitable property, 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 which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States

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Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

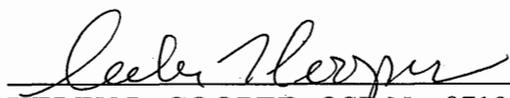
Dated this 26<sup>th</sup> day of March, 2013.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

**S. AMANDA MARSHALL**, OSB No. 953473  
United States Attorney  
District of Oregon

  
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**HELEN L. COOPER**, OSB No. 871957  
Special Assistant United States Attorney