

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x
	:
UNITED STATES OF AMERICA	:
	:
- v. -	: <u>INFORMATION</u>
	:
OSCAR HUACHILLO,	: S1 13 Cr. 995 (KPF)
	:
Defendant.	:
	:
- - - - -	x

COUNT ONE

(Health Care Fraud Conspiracy)

The United States Attorney charges:

1. From in or about 2009 until in or about 2012, in the Southern District of New York and elsewhere, OSCAR HUACHILLO, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, to wit, health care fraud, in violation of Title 18, United States Code, Section 1347.

2. It was a part and an object of the conspiracy that OSCAR HUACHILLO, the defendant, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud health care benefit programs and obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, health care

benefit programs, in connection with the delivery of and payment for health care benefits, items, and services, to wit, HUACHILLO caused bills to be submitted to Medicare in which HUACHILLO materially misrepresented the quantities of medications administered to patients at health care clinics he operated, and caused Medicare patients to be paid cash bribes to induce them to visit, and to refer other patients to, those clinics.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Tax Evasion)

The United States Attorney further charges:

3. From in or about January 2009 through in or about April 2012, in the Southern District of New York and elsewhere, OSCAR HUACHILLO, the defendant, willfully and knowingly did attempt to evade and defeat a substantial part of the income taxes due and owing by him to the United States of America for the tax years 2009 through 2011, to wit, approximately \$3,454,244, by various means, including, among others, filing U.S. Individual Income Tax Returns, Forms 1040, for himself and his wife for the tax years 2009 through 2011 that falsely and fraudulently omitted income that he had obtained from Medicare through the submission of fraudulent bills to Medicare, and thereby falsely understating his taxable income and the tax due

and owing by him to the United States for each of the aforesaid years.

(Title 26, United States Code, Section 7201.)

FORFEITURE ALLEGATION

4. As a result of committing the federal health care fraud conspiracy offense in violation of 18 U.S.C. § 1349, alleged in Count One of this Information, OSCAR HUACHILLO, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), all property real and personal, that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of the offense charged in Count One of this Information, including but not limited to the following:

a. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 329 East 82nd St., New York, NY.

b. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 343 East 74th St. #9F, New York, NY.

c. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures,

attachments and easements, located at 343 East 74th St. #9G, New York, NY.

d. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 343 East 74th St. #10G, New York, NY.

e. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 135 East 54th St. #4E, New York, NY.

f. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 855 North Croft Ave. #207, Los Angeles, CA.

g. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 193 Lakeview Dr. #202, Weston, FL.

h. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 301 Bonaventure Blvd. #2, Weston, FL.

i. All United States currency funds or other monetary instruments located at JPMorgan Chase Bank, N.A.

credited to the following account numbers and in the following names and amounts:

1. \$293,653.45 credited to account number 974999641 in the name of Oscar R. Huachillo;
2. \$411.76 credited to account number 3027692325 in the name of Oscar R. Huachillo;
3. \$2,960,909.15 credited to account number 2957767061 in the name of Ana Cecilia Canamero;
4. \$14,679.71 credited to account number 2903777720 in the name of Ana Cecilia Canamero;
5. \$2,844.36 credited to account number 109920600 in the name of Ana Cecilia Canamero;
6. \$880,354.58 credited to account number 2955099028 in the name of UES 329 Holdings LLC; and
7. \$383.58 credited to account number 205918095 in the name of UES 329 Holdings LLC.

j. One 2011 2-door Maserati Gran Turismo Convertible, Vehicle ID No. ZAM45KMA5B0058685.

k. One 2012 Mercedes G550, Vehicle ID No. WDCYC3HF5CX194826.

Substitute Asset Provision

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

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982, 1347, and 1349; and Title 21, United States Code, Section 853(p).)


PREET BHARARA ^{AT}
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

OSCAR HUACHILLO,

Defendant.

INFORMATION

S1 13 Cr. 995 (KPF)

(18 U.S.C. § 1349,
26 U.S.C. § 7201)

PREET BHARARA

United States Attorney.
