

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi
	:	
v.	:	Criminal No. 20-
	:	
LIOR ATIYAS,	:	18 U.S.C. § 1349
a/k/a "David Cohen"	:	

**INFORMATION**

**COUNT ONE**  
**(Conspiracy to Commit Wire Fraud)**

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

**Relevant Entities and Definitions**

1. At various times relevant to this Information:

- a. Defendant LIOR ATIYAS, a/k/a "David Cohen," was a resident of Nassau County, New York.
- b. Premier Relocations LLC ("Premier") was a household goods moving company located in Elmwood Park, New Jersey. Defendant LIOR ATIYAS served as the owner of Premier. Premier operated its business and advertised its services using various names, including but not limited to, Premier, Metro Van Lines Inc., Astoria Motor Van Company, Lyon Moving, and Empire Move (collectively, the "Companies").
- c. The "Co-conspirators" were the employees of the Companies.

d. The “Victims” were the approximately 190 customers of the Companies who used and paid for the moving services of the Companies between in and around March 2016 and in or around January 2019.

e. Medicaid Programs (collectively, “Medicaid”) were jointly funded, federal-state health insurance programs for certain individuals, including but not limited to low-income adults. Medicaid was administered by individual states, according to federal requirements. All states, the District of Columbia, and the United States territories had a Medicaid program. Individuals who received Medicaid benefits were referred to as Medicaid beneficiaries.

f. In order for low-income adults to be eligible for Medicaid benefits, applicants must have demonstrated that their income is below a certain level, which varies from state to state. Applicants could verify their income by submitting paystubs from their employer.

g. Medicaid was a “health care benefit program” as defined by 18 U.S.C. § 24(b) that affected commerce. Medicaid was also a “Federal health care program” as defined by 42 U.S.C. § 1320a-7b(f).

h. “Co-conspirator-1” was not an employee of the Companies, but rather an individual known to LIOR ATIYAS who falsely represented herself to be an employee of Premier for the purposes of obtaining Medicaid benefits.

## THE WIRE FRAUD CONSPIRACY

2. From in or around March 2016 through in or around January 2019, in the District of New Jersey, and elsewhere, the defendant

**LIOR ATIYAS,  
a/k/a "David Cohen,"**

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud the Victims and to obtain money and property from the Victims by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

### **Object of the Conspiracy**

3. The object of the conspiracy was for LIOR ATIYAS and the Co-conspirators to use the Companies to enrich themselves by obtaining money and property from the Victims by means of materially false and fraudulent pretenses.

### **Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:

a. Defendant LIOR ATIYAS and the Co-conspirators created the Companies, which were used interchangeably in an effort to hide the true identity of the primary moving companies, Premier Relocations LLC and Metro

Van Lines Inc., which received numerous customer complaints and negative Internet reviews.

b. Defendant LIOR ATIYAS served as owner of the Companies and quoted Victims “low-ball” price estimates for moving household goods.

c. Defendant LIOR ATIYAS and the Co-Conspirators accepted deposit payments from the Victims over the phone via credit card.

d. At the time of the scheduled move, after accepting the Victims’ deposits, and after Co-conspirators loaded the Victims’ household items onto the Companies’ moving trucks, the Co-conspirators, acting at the direction of defendant LIOR ATIYAS, drastically raised the price of the move (often two or three times that of the quoted estimate), and then refused to deliver the Victims’ household items until they paid the increased price.

e. Defendant LIOR ATIYAS and the Co-Conspirators threatened to keep or auction the Victims’ household goods until the inflated payment was made to the Companies.

f. Defendant LIOR ATIYAS and the Co-Conspirators used means of wire communications in interstate and foreign commerce to execute their scheme in that defendant LIOR ATIYAS and the Co-Conspirators transmitted the “low-ball” estimates and the inflated price demands through e-mail and telephone. Each time the Victims were coerced into making an inflated payment to the Companies, a wire communication was relayed from New Jersey to a different state.

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

**COUNT TWO**  
**(Conspiracy to Commit Health Care Fraud)**

5. The allegations contained in paragraph 1 of this Information are hereby repeated, realleged, and incorporated as if fully set forth herein.

**THE HEALTH CARE FRAUD CONSPIRACY**

6. From in or around January 2018 through February 2019, in the District of New Jersey, and elsewhere, the defendant,

**LIOR ATIYAS,**  
**a/k/a “David Cohen,”**

knowingly and intentionally conspired and agreed with Co-Conspirator-1 to execute a scheme and artifice to defraud the Medicaid program, a health care benefit program as defined by Title 18, United States Code, Section 24(b), and to obtain, by means of 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, contrary to Title 18, United States Code, Section 1347.

**Object of the Conspiracy**

7. The object of the conspiracy was for defendant LIOR ATIYAS and Co-Conspirator-1 to falsely represent to Medicaid that Co-Conspirator-1 was an employee of Premier in order to fraudulently obtain reimbursement payments for the costs of certain medical care for Co-Conspirator-1.

**Manner and Means of the Conspiracy**

8. It was part of the conspiracy that:

a. In or around February 2018, LIOR ATIYAS created fake paystubs indicating that Co-Conspirator-1 was an employee of Premier who made a relatively low income.

b. In or around March 2018, LIOR ATIYAS prepared a letter on Premier letterhead falsely stating that Co-Conspirator-1 was an employee of Premier.

c. Co-Conspirator-1 used the fake paystubs and the letter prepared by ATIYAS to demonstrate her purported employment status and income to Medicaid for the purposes of obtaining Medicaid health coverage.

d. From in or around February 2018 through in or around January 2019, Co-Conspirator-1 obtained medical services from various providers and submitted claims to Medicaid in excess of \$40,000.

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

**FORFEITURE ALLEGATION AS TO COUNT ONE**

1. As a result of committing the wire fraud offense charged in Count One of this Information, the defendant, LIOR ATIYAS, 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, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the violations of Title 18, United States Code, Sections 1349 and 1343, and all property traceable thereto, alleged in Count One of this Information.

**FORFEITURE ALLEGATION AS TO COUNT TWO**

2. Upon conviction of the Federal health care offense (as defined in 18 U.S.C. § 24) alleged in Count Two of this Information, the defendant, LIOR ATIYAS, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), all property, real or personal, that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of the offenses (as defined in 18 U.S.C. § 24) alleged in Count Two of this Information.

**Substitute Assets Provision**

3. 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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

  
CRAIG CARPENITO  
United States Attorney



CASE NUMBER: \_\_\_\_\_

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**LIOR ATIYAS,  
a/k/a "David Cohen"**

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**INFORMATION FOR**  
18 U.S.C. § 1349

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**CRAIG CARPENITO**  
*UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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CHRISTOPHER D. AMORE  
*ASSISTANT U.S. ATTORNEY*  
*973-645-2757*

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