

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 17-
 :
 v. : 18 U.S.C. § 1347
 :
 APOSTOLOS VOUDOURIS :

I N F O R M A T I O N

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

1. At all times relevant to this Information:

a. The U.S. Department of Veterans Affairs, through various programs, reimbursed health care practitioners, health care facilities, and/or health care plans for rendering Veterans Affairs-covered services to eligible veterans and their eligible dependants.

b. Defendant APOSTOLOS VOUDOURIS was a licensed physician, specializing in cardiology and electrophysiology. In addition to his private practice, beginning in or about 2006, defendant APOSTOLOS VOUDOURIS provided services to eligible veterans at the Veterans Affairs Medical Center in East Orange ("the VA"), New Jersey pursuant to a contract with the VA.

c. Pursuant to his contract with the VA, defendant APOSTOLOS VOUDOURIS was paid by the VA on a per procedure basis.

As such, defendant APOSTOLOS VOUDOURIS was paid by the VA based on the number of procedures he performed under the contract.

2. On more than 350 occasions between in or around 2011 and in or around 2015, defendant APOSTOLOS VOUDOURIS submitted documentation to the VA claiming to have performed procedures he had not actually performed. In this fashion, defendant APOSTOLOS VOUDOURIS fraudulently received \$238,230 from the VA.

3. Between in or around 2011 and in or around 2015, in the District of New Jersey and elsewhere, defendant

APOSTOLOS VOUDOURIS

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a health care benefit program, as defined under Title 18, United States Code, Section 24(b), namely, the Veterans Affairs program, and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, or under the custody and control of, a health care benefit program, namely, the Veterans Affairs program, in connection with the delivery of or payment for health care benefits, items, and services.

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

FORFEITURE ALLEGATION

1. As a result of committing the Federal health care fraud offense (as defined in 18 U.S.C. § 24) in violation of 18 U.S.C. § 1347, as alleged in this Information, defendant APOSTOLOS VOUDOURIS 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 or indirectly, from gross proceeds traceable to the commission of the offense, including but not limited to a forfeiture money judgment in the amount of \$238,230, representing property constituting or derived from gross proceeds traceable to the commission of the offenses to which he is pleading guilty.

2. 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 28 U.S.C. § 982(b), to seek
forfeiture of any other property of said defendant.



WILLIAM E. FITZPATRICK
ACTING UNITED STATES ATTORNEY

CASE NUMBER: _____

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INFORMATION

18 U.S.C. § 1347

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