

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No.
 :
 PARMINDERJEET S. SANDHU : 18 U.S.C. § 1349

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:

1. At all times relevant to this Information:
 - a. Defendant, PARMINDERJEET S. SANDHU, was a medical doctor licensed to practice medicine in the State of New Jersey.
 - b. Medical Care Associates Urgent Care Inc. (“Medical Associates”) was a medical practice operated by defendant PARMINDERJEET S. SANDHU.
 - c. Medical Associates had offices in New Jersey located in Washington, Hackettstown, and Succasunna.
 - d. Co-conspirator Paramjit Singh was not licensed to practice medicine anywhere in the United States.
 - e. Nonetheless, co-conspirator Paramjit Singh was employed by Medical Associates to act as a physician and treat patients of Medical Associates.
 - f. The Medicare Program (“Medicare”) was a federal program that provided free or below-cost health care benefits to certain individuals, primarily the elderly, blind, and disabled. Medicare was a “Federal health care program” as

defined in Title 42, United States Code, Section 1320a-7b(f) and a “health care benefit program” as defined in Title 18, United States Code, Section 24(b).

Individuals who receive benefits under Medicare are commonly referred to as “beneficiaries.”

g. The Medicare Part B program was a federally funded supplemental insurance program that provided supplementary Medicare insurance benefits for individuals aged sixty-five or older, and certain individuals who are disabled. The Medicare Part B program paid for various medical services for beneficiaries.

h. Private health insurance companies including Horizon Healthcare Services, Inc., d/b/a Horizon Blue Cross Blue Shield of New Jersey, Independence Blue Cross, Cigna, Aetna Health, United HealthGroup, AmeriHealth, MagnaCare, and Meritain Health (collectively, “Insurance Companies”) were companies in the business of providing health care insurance to individuals and entities under various insurance policies through which those companies paid for health care services performed for their insureds.

i. The Insurance Companies provided health care insurance plans which were health care benefit programs as defined in Title 18, United States Code, Section 24(b).

2. From in or around August 2014 through in or around October 2017, in Warren County and Morris County, in the District of New Jersey, and elsewhere, defendant

PARMINDERJEET S. SANDHU

did knowingly and intentionally conspire and agree with co-conspirator Paramjit Singh and others to commit health care fraud, that is, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud health care benefit programs, as defined under Title 18, United States Code, Section 24(b), namely health care insurance plans provided by Medicare and the Insurance Companies, 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 programs, 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

3. It was the object of the conspiracy for defendant PARMINDERJEET S. SANDHU and co-conspirator Paramjit Singh to unlawfully enrich themselves by (1) holding out co-conspirator Paramjit Singh as a licensed physician of Medical Associates, when in fact, co-conspirator Paramjit Singh was not licensed to practice medicine; and (2) causing the submission of false and fraudulent insurance claims to health care benefit programs, such as, Medicare and the Insurance Companies, alleging that certain medical services were performed by

defendant PARMINDERJEET S. SANDHU when they were indeed performed by co-conspirator Paramjit Singh.

Manner and Means

4. The manner and means by which defendant PARMINDERJEET S. SANDHU and others sought to accomplish the object of the conspiracy included, among other things, the following:

a. It was part of the conspiracy that defendant PARMINDERJEET S. SANDHU knew co-conspirator Paramjit Singh was not licensed to practice medicine anywhere in the United States.

b. It was further part of conspiracy that despite knowing co-conspirator Paramjit Singh was not licensed to practice medicine, defendant PARMINDERJEET S. SANDHU allowed co-conspirator Paramjit Singh to practice medicine at Medical Associates.

c. It was further part of the conspiracy that defendant PARMINDERJEET S. SANDHU sought reimbursement from Medicare and the Insurance Companies for co-conspirator Paramjit Singh's unlawful practice of medicine by causing the submission of false and fraudulent claims to Medicare and the Insurance Companies. Specifically, the medical services co-conspirator Paramjit Singh provided to the patients of Medical Associates were billed to Medicare and the Insurance Companies as services provided by defendant PARMINDERJEET S. SANDHU.

d. It was further part of the conspiracy that from in or around August 2014 through in or around October 2017, defendant PARMINDERJEET S. SANDHU caused approximately \$2,211,975 in fraudulent claims to be submitted on behalf of Medical Associates to Medicare and the Insurance Companies for medical services claimed to have been provided by defendant PARMINDERJEET S. SANDHU which in reality, were actually performed by co-conspirator Paramjit Singh.

e. It was further part of the conspiracy that Medicare and the Insurance Companies paid to Medical Associates, approximately \$1,162,252.79 for these fraudulently claimed services.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(7).

2. Upon conviction of the Federal health care offense in violation of Title 18, United States Code, Section 1349, defendant PARMINDERJEET S. SANDHU shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

3. If any of the property described above, 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 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;

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to forfeiture of any other property of defendant PARMINDERJEET S. SANDHU up to the value of the property described in the preceding paragraph.


CRAIG CARPENITO
UNITED STATES ATTORNEY