

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal Number:
IRINA ZELIKSON : Title 18, United States Code,
Sections 1349 and 982(a)(7)

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:

Introduction

1. At various times relevant to this Information unless otherwise stated:

The Defendant and Other Parties

a. Defendant IRINA ZELIKSON (hereinafter "ZELIKSON") was a licensed doctor of medicine in New Jersey who specialized in osteopathic medicine. Defendant IRINA ZELIKSON was the sole principal of a professional corporation established under her name that operated out of a medical office located in Elizabeth, New Jersey (hereinafter "Elizabeth Office").

b. Aleksandr Sirota, a co-conspirator not named as a defendant herein, was a resident of New Jersey and a principal owner and operator of TFS Management Services, Inc. (hereinafter "TFS"), which later did business as ADS Management Services, Inc. (hereinafter "ADS"). TFS and ADS were incorporated in New Jersey and provided billing services to medical doctors. Co-Conspirator

Aleksandr Sirota, through TFS and later ADS, submitted claims for payments, medical records, and other documents to various insurance companies located in New Jersey and elsewhere on behalf of defendant IRINA ZELIKSON's professional medical corporation.

c. Grigory Sirota, a co-conspirator not named as a defendant herein, worked at the Elizabeth Office. Co-Conspirator Grigory Sirota was not a licensed medical professional, and he did not possess any medical license issued by the State of New Jersey.

d. Elizabeth DeGuzman, a co-conspirator not named as a defendant herein, was a licensed physical therapist in New Jersey and worked at the Elizabeth Office as a physical therapist.

e. Several companies in New Jersey were engaged in the business of providing automobile insurance to motorists (hereinafter collectively "the victim insurance companies").

Overview of Automobile Insurance & Medical Billing Process

2. Under New Jersey law, any individual who owned a motor vehicle registered in the state was required to maintain liability insurance against losses resulting from death, injury, and property damage arising from use of the motor vehicle. All standard insurance policies in New Jersey included Personal Injury Protection (hereinafter "PIP"). Under PIP, the victim insurance companies were required to pay the necessary and

reasonable medical expenses arising from injuries sustained as a result of a motor vehicle collision, regardless of the individual's fault or liability.

3. To obtain PIP payments, the medical professional providing services, or the billing company acting on his or her behalf, was required to submit to the pertinent insurance company certain documents, including bills and medical records, to support the services rendered to the patient. The insurance companies relied on the documents to pay bills submitted on behalf of patients.

The Conspiracy

4. From in or around February 2004 through in or around June 2005, in the District of New Jersey and elsewhere, defendant

IRINA ZELIKSON

knowingly and willfully conspired and agreed with Co-Conspirators Aleksandr Sirota, Grigory Sirota, Elizabeth DeGuzman, and others to execute a scheme and artifice to defraud health care benefit programs, as defined under 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 health care benefit programs, namely, insurance plans provided by various insurance companies, 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

5. The object of the conspiracy was for defendant IRINA ZELIKSON and her co-conspirators to unlawfully enrich themselves by submitting materially false and fraudulent bills, medical records, and other documents to insurance companies for payments.

Manner and Means of the Conspiracy

6. It was part of the conspiracy that defendant IRINA ZELIKSON and her co-conspirators falsely billed the victim insurance companies for medical treatments and services that had not actually been rendered to patients.

7. It was further part of the conspiracy that Co-Conspirators Aleksandr Sirota and Grigory Sirota billed the victim insurance companies for medical treatments and services that had been rendered by unlicensed and unqualified individuals.

8. It was further part of the conspiracy that defendant IRINA ZELIKSON and her co-conspirators fabricated medical records.

9. It was further part of the conspiracy that defendant IRINA ZELIKSON coached and instructed patients to lie about their physical condition to permit the defendant and her co-conspirators to continue fraudulently billing insurance companies for additional treatments and services.

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

Forfeiture Allegation

1. The allegations set forth in the preceding paragraphs of this Information are realleged as if fully set forth herein.

2. Under Title 18, United States Code, Section 982(a)(7) and based on the conviction of the federal health care fraud offense alleged in this Information, defendant IRINA ZELIKSON shall forfeit to the United States 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 the following:

A sum of money equal to \$14,298.26 in United States currency, representing the amount of proceeds obtained as a result of the offense, namely, the federal health care fraud offense alleged in this Information.

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

- 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;

then it is the intent of the United States, under Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of defendant IRINA ZELIKSON up to the value of the forfeitable property described above.

Pursuant to Title 18, United States Code, Section 982.

CHRISTOPHER J. CHRISTIE
United States Attorney