

FILED

SEP 16 2021 CM

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOHN ACQUAYE-AWAH

)
) Case No. **1:21-cr-00581**
)
)

) Violations: Title 21, United
) States Code, Section
) 846

Judge John Robert Blakey
Magistrate Judge Finnegan

The SPECIAL JULY 2021 GRAND JURY charges:

COUNT 1

1. At times material to this Indictment:

Defendant and Related Individuals and Entities

a. Defendant JOHN ACQUAYE-AWAH was a resident of the Northern District of Illinois and a physician in and around Chicago, Illinois. He was the owner and operator of Medical Practice 1 until the company dissolved in April 2021.

b. Robbin Lewis was a resident of the Northern District of Illinois and a nurse practitioner for Medical Practice 1, and later for Medical Practice 2.

c. Medical Practice 1 was a medical practice located in Chicago, Illinois that provided home visits to its patients.

d. Medical Practice 2 was a medical practice located in Chicago, Illinois and operated by Employee A. Medical Practice 2 was incorporated on October

1, 2019, and assumed the operations of Medical Practice 1, after the Center for Medicare Services (CMS) suspended payments to Medical Practice 1.

2. From in or around June 2017, and continuing through in or around March 2020, in the Northern District of Illinois, and elsewhere,

JOHN ACQUAYE-AWAH,

defendant herein, knowingly and intentionally conspired with other persons known and unknown to the Grand Jury, to cause the use of a registration number that was issued to another person, in the course of distributing and dispensing controlled substances, in violation of Title 21, United States Code, Section 843(a)(2).

3. It was the purpose of the conspiracy for defendant JOHN ACQUAYE-AWAH, with the assistance of Robbin Lewis and others, to ensure that patients of Medical Practice 1 and Medical Practice 2 were provided prescriptions for Schedule II controlled substances under the registration number of defendant JOHN ACQUAYE-AWAH, whether or not those patients underwent evaluations by a licensed and registered health care provider when the prescriptions were issued; whether or not defendant JOHN ACQUAYE-AWAH was the health care provider present for the evaluations that did occur; and whether or not the health care provider who was present could lawfully prescribe such substances.

4. It was part of the conspiracy that defendant JOHN ACQUAYE-AWAH arranged for Schedule II controlled substance prescriptions to be issued under his registration number while he was out of the country, including by signing blank prescriptions and distributing them among certain employees at Medical Practice 1,

including Robbin Lewis, who filled out the remainder of the information called for in the prescriptions and provided them to patients, as if the prescriptions were written by defendant JOHN ACQUAYE-AWAH.

5. It was further part of the conspiracy that defendant JOHN ACQUAYE-AWAH and Employee A provided unsigned paper prescriptions under the name of defendant JOHN ACQUAYE-AWAH to Robbin Lewis.

6. It was further part of the conspiracy that Robbin Lewis wrote prescriptions for Schedule II controlled substances and provided them to patients of Medical Practice 1 and Medical Practice 2, using the registration number issued to defendant JOHN ACQUAYE-AWAH, on pre-signed and unsigned paper prescriptions of defendant JOHN ACQUAYE-AWAH, when Lewis was not legally authorized to prescribe such substances;

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about September 1, 2017, in the Northern District of Illinois, and elsewhere,

JOHN ACQUAYE-AWAH,
defendant herein, knowingly and intentionally aided and abetted Robbin Lewis in the use of a registration number that was issued to another person, namely JOHN

ACQUAYE-AWAH, in the course of distributing hydrocodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 843(a)(2).

FORFEITURE ALLEGATION

The SPECIAL JULY 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 843 and 846, as set forth in this Indictment, defendant JOHN ACQUAYE-AWAH shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation, pursuant to Title 21, United States Code, Section 853(a).

2. Such property includes, but is not limited to, a forfeiture money judgment in an amount to be proved in this matter, representing the total value of all property representing the gross proceeds of the aforementioned offense, or is traceable to such property, and/or is involved in or was used to commit or facilitate the commission of, the violations charged in this Indictment.

3. If any of the property described above, as a result of any act or omission by the defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been

commingled with any property which cannot be divided without difficult, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

JOSEPH S. BEEMSTERBOER
UNITED STATES DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION
ACTING CHIEF

ALLAN MEDINA
UNITED STATES DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION
DEPUTY CHIEF