UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA v. JOHN DOE, Defendant	Criminal No. 20cr10118 Violations: Count One: False Representation of Social Security Number (42 U.S.C. § 408(a)(7)(B)) Count Two: Aggravated Identity Theft (18 U.S.C. § 1028A(a)(1)) Count Three: False Statement Relating to Health Care Matters; Aiding and Abetting (18 U.S.C. §§ 1035(a)(2) and 2) Forfeiture Allegation: (18 U.S.C. § 982(a)(7))

INDICTMENT

COUNT ONE
False Representation of Social Security Number
(42 U.S.C. § 408(a)(7)(B))

The Grand Jury charges:

On or about August 14, 2017, in Lawrence, in the District of Massachusetts, the defendant,

JOHN DOE,

for the purpose of obtaining anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him on an application for a Massachusetts identification card, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT TWO
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

On or about August 14, 2017, in Lawrence, in the District of Massachusetts, the defendant,

JOHN DOE,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), that is, False Representation of Social Security Number, in violation of Title 42, United States Code, Section 408(a)(7)(B), as charged in Count One.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE
False Statement Relating to Health Care Matters; Aiding and Abetting
(18 U.S.C. §§ 1035(a)(2) and 2)

The Grand Jury further charges:

On or about August 3, 2015, in the District of Massachusetts, the defendant,

JOHN DOE,

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, that is, that his name was that of a person with the initials E.E.R.C., in connection with the delivery of and payment for health care benefits, items, and services involving MassHealth, a health care benefit program as defined in Title 18, United States Code, Section 24(b).

All in violation of Title 18, United States Code, Sections 1035(a)(2) and 2.

FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(7))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1035, set forth in Count Three, the defendant,

JOHN DOE,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(7), 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;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(7).

A TRUE BILL

FOREPERSON

WILLIAM F. ABELY
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JUNE 23, 2020
Returned into the District Court by the Grand Jurors and filed.

Dawn M. King 2:35pm
DEPUTY CLERK