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CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 22-CR-10012
	)	
AARON J. ROSSI,	)	18 U.S.C. § 1341
	)	26 U.S.C. § 7206(1)
Defendant.	)	

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNTS 1 - 6
(Mail Fraud)

Background

At all times material to this Indictment:

1. Central Illinois Orthopedic Surgery ("CIOS"), located in Bloomington, Illinois, provided surgical orthopedic services, physical therapy, and sports medicine services.

2. CIOS was owned by two licensed physicians, identified herein as Victim A and Victim B.

3. In approximately 2008, Defendant AARON J. ROSSI ("ROSSI") worked as an extern at CIOS.

4. In or around July 2012, ROSSI earned a medical degree from a medical school in Barbados.

5. After obtaining the medical degree, ROSSI did not complete either a medical residency or fellowship. As a result, ROSSI was not eligible to be licensed as a physician in the State of Illinois.

6. In or around late 2012, ROSSI was hired by CIOS to assist with administrative duties. Shortly thereafter, ROSSI became the CIOS office manager. Over time, ROSSI assumed greater administrative responsibilities at CIOS, including responsibilities involving CIOS finances, financial accounts, and credit cards.

7. ROSSI also worked as a "surgical assistant" at CIOS. As a surgical assistant, ROSSI could only work under the direct supervision of a licensed physician.

8. On or about March 15, 2018, ROSSI was terminated by CIOS.

Scheme to Defraud

9. Beginning at least as early as December 2014 and continuing until in or about March 2018, in McLean County, Illinois, in the Central District of Illinois, and elsewhere,

AARON J. ROSSI,

defendant herein, did knowingly engage and attempt to engage in a scheme and artifice to defraud CIOS, Victim A, Victim B, and others and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

10. It was a part of the scheme that ROSSI portrayed himself as a physician and allowed others to falsely believe that he was a physician licensed to practice medicine. In truth and fact, as he well knew, ROSSI was not licensed to practice medicine in the State of Illinois and had been directed by the State of Illinois Department of Professional Regulation to cease and desist from making that false representation.

11. It was further a part of the scheme that ROSSI abused his role and administrative responsibilities at CIOS for his personal benefit and gain.

12. It was further a part of the scheme that ROSSI moved the CIOS bank account from Commerce Bank to Chase Bank and changed the accountants CIOS used.

13. It was further a part of the scheme that, unbeknownst to Victim A and Victim B, ROSSI used CIOS credit cards and funds for his personal use and benefit. This included the purchase of an audio-visual system for his home, the lease of a private jet, car repairs, various personal items, and payments made on his personal credit card.

14. It was further a part of the scheme that ROSSI made and caused to be made false and misleading entries into the books and records of CIOS to conceal the true nature of ROSSI's purchases and expenditures.

15. As a result of the scheme and artifice to defraud, AARON J. ROSSI defrauded CIOS, Victim A, Victim B, and others of more than $1,000,000.

Mailings

16. On or about the below-listed dates, in McLean County, in the Central District of Illinois and elsewhere,

AARON J. ROSSI,

Defendant herein, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, did knowingly order products from Amazon, an online retailer, and caused those below described products to be delivered by mail and by private commercial interstate carrier, according to the directions thereon, to his residence in McLean County, Illinois:

Count	Date	Means	Mailing
1	7/12/17	UPS	Folding Propellers Black Drone Kit Remote
2	7/12/2017	USPS	Nike Squadra Short Sleeve Training Top
3	7/13/2017	USPS	Collapsible Quadcopter with Remote
4	8/20/2017	USPS	Bissell ProHeat Full-Size Carpet Cleaner
5	8/20/2017	UPS	Dyson V8 Animal Cordless Stick Vacuum
6	12/14/2017	UPS	Sony 49-Inch 4K Ultra HD Smart LED TV

All in violation of Title 18, United States Code, Section 1341.

COUNT 7

(Making and Subscribing a False Tax Return)

17. The grand jury realleges and incorporates by reference paragraphs 1-15 as paragraph 17 as if fully set forth herein.

18. On or about April 15, 2016, in the Central District of Illinois and elsewhere,

AARON J. ROSSI,

defendant herein, a resident of Bloomington, Illinois, did willfully make and subscribe and caused to be filed with the IRS, a joint U.S. Individual Income Tax Return, Form 1040, for calendar year 2015 which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter, that Form 1040, which was prepared and signed in the Central District of Illinois and was filed with the Internal Revenue Service, reported taxable income of $324,836, whereas as he then and there knew, he received income in addition to the amount stated in the return.

In violation of Title 26, United States Code, Section 7206(1).

COUNT 8

(Making and Subscribing a False Tax Return)

19. The grand jury realleges and incorporates by reference paragraphs 1-15 as paragraph 19 as if fully set forth herein.

20. On or about May 22, 2017, in the Central District of Illinois and elsewhere,

AARON J. ROSSI,

defendant herein, a resident of Bloomington, Illinois, did willfully make and subscribe and caused to be filed with the IRS, a single U.S. Individual Income Tax Return, Form 1040, for calendar year 2016 which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter, that Form 1040, which was prepared and signed, and he caused to be signed, in the Central District of Illinois and was filed with the Internal Revenue Service, reported taxable income of $500,341, whereas as he then and there knew, he received income in addition to the amount stated in the return.

In violation of Title 26, United States Code, Section 7206(1).

COUNT 9
(Making and Subscribing a False Tax Return)

21. The grand jury realleges and incorporates by reference paragraphs 1-15 as paragraph 21 as if fully set forth herein.

22. On or about July 30, 2018, in the Central District of Illinois and elsewhere,

AARON J. ROSSI,

defendant herein, a resident of Bloomington, Illinois, did willfully make and subscribe and caused to be filed with the IRS, a joint U.S. Individual Income Tax Return, Form 1040, for calendar year 2017 which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter, that Form 1040, which was prepared and signed, and he caused to be signed, in the Central District of Illinois and was filed with the Internal Revenue Service, reported taxable income of $472,180, whereas as he then and there knew, he received income in addition to the amount stated in the return.

In violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL.

s/Foreperson
FOREPERSON

s/Gregory Harris
GREGORY K. HARRIS
United States Attorney
Kgl/Dfm