

FILED

APR 25 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ 634-13-11
Superior Court
Docket Number _____

STATE OF NEW JERSEY)

v.)

IBILOLA IGHAMA-AMEGOR)

INDICTMENT

13 - 04 - 00084 - S

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Health Care Claims Fraud - Second Degree)

Between on or about April 30, 2008, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the

provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Health Care Claims Fraud - Second Degree)

Between on or about June 25, 2008, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Health Care Claims Fraud - Second Degree)

Between on or about August 31, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Health Care Claims Fraud - Second Degree)

Between on or about September 28, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Health Care Claims Fraud - Second Degree)

Between on or about September 30, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Health Care Claims Fraud - Second Degree)

Between on or about October 21, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Health Care Claims Fraud - Second Degree)

Between on or about October 30, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Health Care Claims Fraud - Second Degree)

Between on or about November 23, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Health Care Claims Fraud - Second Degree)

Between on or about November 30, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Health Care Claims Fraud - Second Degree)

Between on or about December 30, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Health Care Claims Fraud - Second Degree)

Between on or about June 14, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Health Care Claims Fraud - Second Degree)

Between on or about June 30, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Health Care Claims Fraud - Second Degree)

Between on or about September 27, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Health Care Claims Fraud - Second Degree)

Between on or about October 26, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Health Care Claims Fraud - Second Degree)

Between on or about October 29, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Health Care Claims Fraud - Second Degree)

Between on or about December 13, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Health Care Claims Fraud - Second Degree)

Between on or about December 20, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or omit or cause to be omitted material facts from, any record, bill, claim or other document, in writing, electronically or in any other form, and did attempt to submit same, submit same, cause same to be submitted, or attempt to cause same to be submitted for payment or reimbursement for health care services;

THAT IS, IBILOLA IGHAMA-AMEGOR, a practitioner licensed to practice medicine in the State of New Jersey, in the course of providing professional services, knowingly did submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 2C:21-4.2 and N.J.S.A. 2C:21-4.3a and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Medicaid Fraud - Third Degree)

Between on or about January 1, 2008, and on or about May 16, 2011, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

IBILOLA IGHAMA-AMEGOR

did knowingly and willfully make or cause to be made a false statement or representation of a material fact in a claim form or document necessary to receive any benefit or payment under the New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq., with an intent to fraudulently secure payments or benefits not authorized under the Act or in greater amount than that which is authorized under the Act;

THAT IS, IBILOLA IGHAMA-AMEGOR, who is a practitioner, did knowingly submit claims to the New Jersey Medical Assistance and Health Services Program ("Medicaid"), for payment or reimbursement for health care services, on eighteen (18) separate days, for more treatments or procedures than can be performed during the time in which the treatments or procedures were represented to have been performed, contrary to the provisions of N.J.S.A. 30:4D-17(b) and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Theft by Deception - Third Degree)

Between on or about January 1, 2008, and on or about May 16, 2011, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court,

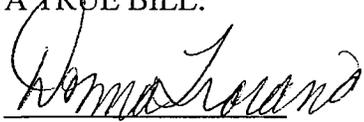
IBILOLA IGHAMA-AMEGOR

purposely did obtain the property of the New Jersey Medical Assistance and Health Services Program ("Medicaid") having a value of approximately \$73,138.82, by deception, that is, by creating or reinforcing the false impression that she had provided prolonged services totaling twenty-four (24) hours or more on eighteen (18) separate days, contrary to the provisions of N.J.S.A. 2C:20-4 and against the peace of this State, the government and dignity of the same.



Ronald Chillemi
Acting Insurance Fraud Prosecutor

A TRUE BILL:



, Foreperson

Dated: 4/25/13

FILED

APR 25 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ634-13-11

Superior Court

Docket Number 13 - 04 - 00084 - S

STATE OF NEW JERSEY)

v.)

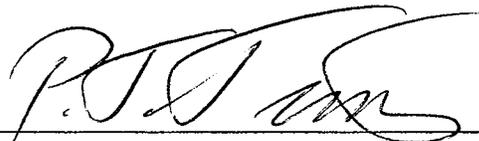
IBILOLA IGHAMA-AMEGOR)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this *25th* day of *April*, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Essex for filing.



Pedro J. Jimenez, Jr., J.S.C.