

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA ) No.  
 )  
 v. ) Violation: Title 18, United States  
 ) Code, Section 1347  
 CECILIA IBRAHIM )  
 )

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

**The Defendant**

a. Defendant CECILIA IBRAHIM was a physician licensed to practice medicine in Illinois who specialized in internal medicine. Defendant IBRAHIM operated a clinic called Sunrise Medical Center, located in Flossmoor, Illinois.

**Medicare**

b. Medicare was a health care benefit program pursuant to Title 18, United States Code, Section 24(b). The Centers for Medicare and Medicaid Services, also known as CMS, was a federal agency within the United States Department of Health and Human Services that administered the Medicare program through its contractors. Medicare provided free or below-cost health care benefits to certain eligible beneficiaries, primarily persons who were sixty-five years of age and older.

c. CMS contracted with Wisconsin Physicians Services to process certain Medicare claims submitted for physician's services for beneficiaries in Illinois. Medicare did not pay for services it classified as experimental.

### **Blue Cross Blue Shield**

d. Blue Cross Blue Shield of Illinois, located in Chicago, Illinois, was a health care benefit program as defined in Title 18, United States Code, Section 24(b) that provided health insurance plans to groups of individuals. Blue Cross did not pay for services it classified as experimental.

### **Status as Enrolled Provider**

e. Defendant IBRAHIM was an enrolled provider of Medicare and Blue Cross, and was approved to administer services to Medicare beneficiaries and Blue Cross insureds and to receive compensation for the services, provided the services met requirements for reimbursement.

### **Billing and Diagnosis Codes**

f. Medicare and Blue Cross required that the claim forms submitted by health care providers include information including the dates of service, provider name, patient name, and the services rendered in the form of a numerical code called a CPT code.

g. CPT code 64722 was the code for spinal decompression by neuroplasty, a surgical procedure, and did not cover Intervertebral Differential Dynamics therapy, which was a non-surgical procedure. Medicare and Blue Cross classified IDD therapy as experimental and did not pay for such therapy.

2. Beginning no later than in or about March 2006, and continuing through in or about August 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CECILIA IBRAHIM,

defendant herein, knowingly and willfully participated in a scheme to defraud a health care benefit program, including Medicare and Blue Cross, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money owned by, and under the custody and control of such program, in connection with the delivery of and payment for health care benefits, items, and services, which scheme is further described below.

3. It was part of the scheme that defendant IBRAHIM submitted over 3,200 insurance claims to Medicare and Blue Cross for over \$1.7 million using CPT code 64722 for IDD therapy she performed on her patients, when defendant knew that CPT code 64722 was for a surgical procedure she was not performing.

4. It was further part of the scheme that defendant IBRAHIM misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, certain material facts, including the acts and purposes of the acts done in furtherance of the scheme.

5. As a result of the scheme to defraud, defendant caused a loss of at least \$300,000 to Medicare and \$550,000 to Blue Cross.

6. On or about March 3, 2009, at Flossmoor, in the Northern District of Illinois, Eastern Division, and elsewhere,

CECILIA IBRAHIM,

defendant herein, knowingly and willfully executed and attempted to execute the scheme by submitting a claim to Blue Cross using CPT code 64722 for IDD therapy she performed on Individual A, when defendant knew that she did not perform the procedure described by CPT code 64722;

In violation of Title 18, United States Code, Section 1347.

## FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further charges:

1. The allegations in this information are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(7).

2. As a result of the violation of Title 18, United States Code, Section 1347 as alleged in the foregoing information,

CECILIA IBRAHIM,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any and all right, title, and interest she may have in any property, real and personal, that constitutes and is derived, directly and indirectly, from gross proceeds traceable to the commission of the offense, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(7).

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) include the sum of at least \$882,500.

4. If any of the forfeitable property described above, as a result of any act or omission by 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;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

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UNITED STATES ATTORNEY