

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN HOWSER,

Defendant.

Case No. 16 CR 1410-NMA.

I N F O R M A T I O N

Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 18, U.S.C.,
Sec. 981(a)(1)(C) and
Title 28, U.S.C., Sec. 2461(c) -
Criminal Forfeiture

The United States charges, at all times relevant:

Count 1

CONSPIRACY TO COMMIT HEALTH CARE FRAUD, HONEST SERVICES MAIL FRAUD AND
VIOLATE THE TRAVEL ACT, 18 USC § 371

1. Beginning on a date unknown and continuing through at least
June 2016, within the Southern District of California and elsewhere,
defendant STEVEN HOWSER did knowingly and intentionally conspire with
others to:

a. commit Health Care Fraud, that is, to knowingly and with the
intent to defraud execute a material scheme to defraud a health care
benefit program, and to obtain by means of materially false and
fraudulent pretenses, representations, and promises, any of the money
and property owned by, and under the custody and control of a health

1 care benefit program, in connection with the delivery of and payment
2 for health care benefits, items, and services, in violation of
3 Title 18, United States Code, Section 1347;

4 b. commit Honest Services Mail Fraud, that is, to knowingly and
5 with the intent to defraud, devise and participate in a material
6 scheme to defraud and to deprive patients of the intangible right to a
7 doctor's honest services, and to cause mailings in furtherance
8 thereof, in violation of Title 18, United States Code, Sections 1341
9 and 1346; and

10 c. violate the Travel Act, that is, to use and cause to be used
11 facilities in interstate commerce with intent to promote, manage,
12 establish, carry on, distribute the proceeds of, and facilitate the
13 promotion, management, establishment, carrying on, and distribution of
14 the proceeds of an unlawful activity, that is, commercial bribery in
15 violation of California law, and, thereafter, to promote and attempt
16 to perform acts to promote, manage, establish, carry on, distribute
17 the proceeds of, and facilitate the promotion, management,
18 establishment, carrying on, and distribution of the proceeds of such
19 unlawful activity, in violation of Title 18, United States Code,
20 Sections 1952(a)(1) and (a)(3).

21 OVERT ACT

22 2. In furtherance of the conspiracy and in order to effect the
23 objects thereof, Defendant committed or caused the commission of the
24 following overt act in the Southern District of California and
25 elsewhere: On August 27, 2014, Defendant gave Dr. I \$8,000 in payment
26 for the patients Dr. I had referred to Defendant's company, Post
27 Surgical Rehab Specialists, Inc., for durable medical equipment from
28 January through July 2014.

1 All in violation of Title 18, United States Code, Section 371.

2 FORFEITURE ALLEGATION

3 3. Upon conviction of the offense of Conspiracy as alleged in
4 Count 1, defendant STEVEN HOWSER shall forfeit to the United States
5 all right, title, and interest in any property, real or personal, that
6 constitutes or is derived from proceeds traceable to a violation of
7 such offenses, including a sum of money equal to the total amount of
8 gross proceeds derived, directly or indirectly, from such offenses.

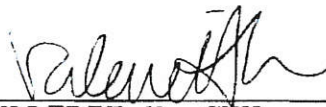
9 4. If any of the above described forfeitable property, as a
10 result of any act or omission of defendants STEVEN HOWSER: (a) cannot
11 be located upon the exercise of due diligence; (b) has been
12 transferred or sold to, or deposited with, a third party; (c) has been
13 placed beyond the jurisdiction of the Court; (d) has been
14 substantially diminished in value; or (e) has been commingled with
15 other property which cannot be divided without difficulty;

16 it is the intent of the United States, pursuant to Title 21, United
17 States Code, Section 853(p) and Title 18, United States Code,
18 Section 982(b), to seek forfeiture of any other property of defendants
19 STEVEN HOWSER up to the value of the forfeitable property described
20 above.

21 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
22 Title 28, United States Code, Section 2461(c).

23 DATED: June 21, 2016.

24 LAURA E. DUFFY
25 United States Attorney

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27 VALERIE H. CHU
28 Assistant U.S. Attorney

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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,


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14 STEVEN HOWSER,
15 Defendant.
16

Criminal Case No. 16CR1410-H
ORDER ACCEPTING PLEA

17 No objections having been filed, **IT IS ORDERED** that the Findings and
18 Recommendation of the Magistrate Judge are adopted and this Court accepts
19 Defendant's PLEA OF GUILTY to Count 1 of the Information.
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21 DATED: September 2, 2016

22 
23 MARILYN L. HUFF, District Judge
24 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE BY MAIL
(C.C.P. section 1013(a), 2015.5)

I am over the age of 18 years and not a party to the entitled action. My business address is 1515 Clay Street, 18th Floor, Oakland, California 94612.

I served the following documents:

- **Notice of Provider Suspension – Workers’ Compensation**
- **Information in *United States of America v. Steven Howser* (Case No. 16CR1410) – U.S. District Court (Southern District of California)**
- **Order Accepting Plea in *United States of America v. Steven Howser* (Case No. 16CR1410) – U.S. District Court (Southern District of California)**

on the following person(s) at the following address(es):

Steven Howser
10450 Pioneer Blvd., Suite #3
Santa Fe Springs, CA 90670-8227

The documents were served by the following means:

☒ **(BY U.S. CERTIFIED MAIL)** I enclosed the documents in a sealed envelope or package addressed to the person(s) at the address(es) listed above and:

☒ Placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with the firm’s practice for collection and processing correspondence for mailing. Under that practice, on the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service in a sealed envelope or package with the postage fully prepaid.

I declare under penalty of perjury under the laws of State of California that the above is true and correct.

Executed on April 14, 2017, at Oakland, California.



CATHY FUJITA-LAM