

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

*v.*

SHAILESH KOTHARI A/K/A  
SHUE KOTHARI AND  
TIMOTHY MCMENAMIN

Criminal Action No.

1:18-CR-395-ELR

**Government's Response to Sentencing Memorandum**

The United States of America, by Byung J. Pak, United States Attorney, and Christopher J. Huber, Assistant United States Attorney for the Northern District of Georgia, files this Response to Sentencing Memorandum to assist the Court in imposing a just sentence for defendants Shailesh Kothari and Timothy McMenamin.

**Argument**

McMenamin filed a sentencing memorandum, Doc. 27, that warrants a brief response with respect to two points. First, he says he will submit a declaration from a representative of Primera's billing company, Fi-Med, to support his argument that the Court should consider the paid amount of the fraudulent claims for the loss calculation under the Guidelines, rather than the intended loss that is represented by the billed amount. Second, although he acknowledged perks of working with Kothari, including driving Kothari's Bentley, trips to the

Caribbean, and partying, he claims that he was not paid much money during the course of the conspiracy.

First, the Court should use the intended loss figure of \$8.8 million. At the moment, it is not clear what the declaration from Fi-Med will say, but under the case law, it is important to look at the defendant's intent to determine intended loss, not the opinion of a third party. See *United States v. Harlan*, 714 F. App'x 220, 225 (4th Cir. 2017). In *Harlan*, the court rejected the defendant's reliance upon a Medicaid manager's testimony to support the contention that the paid amounts, rather than the billed amounts, should be considered the loss amount. *Id.* This is because that testimony was not "evidence of [the defendant's] subjective intent" which is what determines the appropriate amount of intended loss attributable as a result of a fraudulent scheme. *Id.* See also *United States v. Iwuala*, 789 F.3d 1, 14-15 (1st Cir. 2015) (focus on intent and knowledge of defendant, rather than on amount insurer routinely paid); *United States v. Sutton*, 582 F.3d 781, 784-5 (7th Cir. 2009) (focus on defendant's intent even where insurer denied payment on some claims).

Second, McMenemy received substantial benefits from the fraudulent scheme. While his sentencing memorandum includes an acknowledgement of some benefits, a few examples could help the Court in fashioning a fair sentence. The reality was that McMenemy was leading a life of luxury, taking advantage of the fraud. A co-employee emailed McMenemy in November 2016, saying "I would like to you and Shue about possibly toning down your lifestyles a bit. Getting rid of corp office, getting rid of the luxury vehicles, not traveling every

weekend to Chicago and tropical islands . Just being normal people so the company can actually make money.” Ex. 28.

Earlier, in October, Kothari emailed McMenemy a brochure about private flying while remarking that they already had cars, watches, and a boat as a result of the scheme. Ex. 29. Kothari wrote:

Its time we start looking at this way of travel for us!!..BOOOOMMM!!!!!!!  
Cars...Checked!  
Watches...Checked!!  
Boat...Checked!!!!  
Plane...Pending!!!!

Ex. 29. McMenemy responded, “This is the ultimate bro!!!” Ex. 29.

It is also apparent that McMenemy drove luxury cars, and not just Kothari’s. In June 2016, he asked about leasing a Ferrari, “What’s the price for the Ferrari.” Ex. 30. When he was told it was \$1559, he said, “That’s too much for the Ferrari. What about the Bentley again. We paid \$1600 for 2 days last time.” Ex. 30. He then inquired about buying the Bentley for cash: “[W]ould prestige consider selling the Bentley to me? I would not be financing. I would pay for the car in cash in order to seek a better offer.” Ex. 31 (emphasis added). He then said he was “willing to pay \$85,000 cash.” Ex. 31. This is not the behavior of someone who is cash poor, living off of credit cards and not profiting from the fraudulent scheme.

Finally, McMenemy subscribed to a monthly luxury watch program, costing \$400 per month. Ex. 32. This program was essentially a \$400 per month watch

leasing program – McMenamin was able to wear one luxury watch for two months before returning for a new watch. Ex. 33, 33. McMenamin took advantage of this service at least through February 2017. *See* Exs. 32-35.

### **Conclusion**

For the reasons stated above and for the reasons stated in the government's sentencing memorandum, the Court should not depart or vary downward beyond the one level sought by the parties and should sentence the defendants to a low-end sentence.

Respectfully submitted,

BYUNG J. PAK

*United States Attorney*

/s/CHRISTOPHER J. HUBER

*Assistant United States Attorney*

Georgia Bar No. 545627

chris.huber@usdoj.gov

600 U.S. Courthouse, 75 Ted Turner Drive S.W., Atlanta, GA 30303  
(404) 581-6000 fax (404) 581-6181

**Certificate of Service**

The United States Attorney's Office served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

Robert G. Rubin

*Counsel to Timothy McMenamin*

Jeffrey H. Brickman

*Counsel to Shailesh Kothari*

March 11, 2019

/s/ CHRISTOPHER J. HUBER

CHRISTOPHER J. HUBER

*Assistant United States Attorney*

# EXHIBIT 28

**From:** Tim McMenamin <t.mcmenamin@pmgwellness.com>  
**Sent:** Thursday, November 17, 2016 11:49 AM  
**To:** Matt Miller <m.miller@pmgwellness.com>  
**Subject:** Re: Banquet Event Order and diagram

---

we got charged 3 times in fayetteville.... thanks for the advice matt

On Thu, Nov 17, 2016 at 10:46 AM, Matt Miller <m.miller@pmgwellness.com> wrote:

Springdale is attached (first day of Arkansas near Fayetteville ). I'm in Fort Smith rt now. It is about to get charged today I'm sure. I don't think we financially were prepared for these as a company. Taxes room rates, projections were unrealistic. I would like to you and Shue about possibly toning down your lifestyles a bit. Getting rid of corp office, getting rid of the luxury vehicles, not traveling every weekend to chicago and tropical islands . Just being normal people so the company can actually make money.

On Nov 17, 2016 9:40 AM, "Tim McMenamin" <t.mcmenamin@pmgwellness.com> wrote:  
Got them both. Send me Arkansas now

Sent from my iPhone

On Nov 17, 2016, at 10:38 AM, Matt Miller <m.miller@pmgwellness.com> wrote:

Arizona

----- Forwarded message -----

From: "McPherson, Valerie" <vmcpherson@sheratonphoenixcrescent.com>  
Date: Nov 12, 2016 12:17 PM  
Subject: Banquet Event Order and diagram  
To: "Matt Miller" <m.miller@pmgwellness.com>  
Cc:

Hi Matt, here are the BEOs for next week and also a diagram. Please sign and send back.  
Also what time will you be checking in on Thursday? Let me know, thanks Valerie

VALERIE MCPHERSON, CMP

Senior Catering Manager

T +1 602 [REDACTED] F +1 602 371 2821

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<primera.pdf>

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**Tim McMenamin, COO**  
Primera Medical Group, Inc.

One Buckhead Plaza  
3060 Peachtree Rd, Suite 965  
Atlanta, GA 30305  
(O) 678-908-7564 Ext: 217  
(C) 678-755-0264  
www.PMGWellness.com

Check Us Out on Facebook and "Like" Us:  
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# EXHIBIT 29

**From:** Tim McMenamin <t.mcmenamin@pmgwellness.com>  
**Sent:** Saturday, October 22, 2016 10:29 AM  
**To:** skothari@primera-usa.com  
**Subject:** Re: UP The Way You Fly

---

This is the ultimate bro!!!

Sent from my iPhone

On Oct 22, 2016, at 8:41 AM, [skothari@primera-usa.com](mailto:skothari@primera-usa.com) wrote:

Its time we start looking at this way of travel for us!!..BOOOOMMM!!!!!!!!!!

Cars...Checked!  
Watches...Checked!!  
Boat...Checked!!!!  
Plane....Pending!!!!

-----Original Message-----

From: "Andre Hazelwood" <[andre@wheelsup.com](mailto:andre@wheelsup.com)>  
Sent: Wednesday, July 20, 2016 11:03am  
To: [skothari@primera-usa.com](mailto:skothari@primera-usa.com)  
Subject: UP The Way You Fly

To view this email as a web page, [click here](#)



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# EXHIBIT 30

**From:** Beth Lopez <Beth@prestigeluxuryrentals.com>  
**Sent:** Wednesday, June 8, 2016 3:23 PM  
**To:** Tim McMenamin <t.mcmenamin@pmgwellness.com>  
**Subject:** RE: Cars Available  
**Attach:** Mercedes benz AMG GTS.jpg; Bentley GT Red.jpg

---

i have great news I have attached 1 day rental for Bentley GT  
Or Mercedes GTS

Bentley GT \$ 857  
Mercedes GTS AMG \$ 803

Very truly yours,

**Beth Lopez | Manager**  
HQ (305) 513-9711  
TEL: (888) 513-9711  
FAX: (305) 513-9712  
[Beth@prestigeluxuryrentals.com](mailto:Beth@prestigeluxuryrentals.com)  
[www.prestigeluxuryrentals.com](http://www.prestigeluxuryrentals.com)

---

**From:** Tim McMenamin [mailto:t.mcmenamin@pmgwellness.com]  
**Sent:** Wednesday, June 08, 2016 3:18 PM  
**To:** Info  
**Subject:** Re: Cars Available

That's to much for the Ferrari. What about the Bentley again. We paid \$1600 for 2 days last time

Sent from my iPhone

On Jun 8, 2016, at 3:08 PM, Info <[info@prestigeluxuryrentals.com](mailto:info@prestigeluxuryrentals.com)> wrote:

Yes it comes back in the morning and I will give her a deal...

Total \$ 1559.

Deposit \$ 1000 hold.

Beth

---

**From:** Tim McMenamin [mailto:t.mcmenamin@pmgwellness.com]  
**Sent:** Wednesday, June 08, 2016 2:48 PM  
**To:** Info  
**Subject:** Re: Cars Available

What's the price for the Ferrari ? She needs from 4pm tomorrow until maybe noon the next day? Any specials now we are a repeat customer?

Sent from my iPhone

On Jun 8, 2016, at 1:35 PM, Info <[info@prestigeluxuryrentals.com](mailto:info@prestigeluxuryrentals.com)> wrote:

---

**From:** Tim McMenamin [<mailto:t.mcmenamin@pmgwellness.com>]  
**Sent:** Wednesday, June 08, 2016 1:31 PM  
**To:** Beth Lopez  
**Subject:** Re: Cars Available

Please send the pic of the Ferrari

Sent from my iPhone

On Jun 8, 2016, at 1:25 PM, Beth Lopez <[Beth@prestigeluxuryrentals.com](mailto:Beth@prestigeluxuryrentals.com)> wrote:

Below is our Atlanta fleet book in advance and receive %15 off...

<image001.jpg> 2015 E400 Benz 4 Passenger

<image002.jpg> 2015 E400 Benz 4 Passenger

<image003.jpg> Jaguar Ftype 2 passenger

<image004.jpg> Lamborghini Gallardo spider 2 passenger

<image005.jpg> Bentley GT Coupe 4 passenger

<image006.jpg> Mercedes GTS AMG 2 passenger

<image007.jpg> Escalade ESV 7 passenger

<image008.jpg> Range Rover HSE 5 passenger

<image009.jpg> Mercedes S550 5 passenger

<image010.jpg> Rolls Royce Ghost 5 passenger

<2011 Ferrari 458 Italia (White)-Front.png>

<2011 Ferrari 458 Italia (White)-Side.png>



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## VEHICLE SPECIFICATIONS

Make	Model	Doors
Bentley	Continental GT V8	2DR
Trim	Vehicle type	Horse Power
Base	Coupe	500
Drive train type	Engine configuration	Engine displacement
AWD	V8	4L
Fuel capacity	Fuel type	Transmission
24.0	Gasoline	Automatic Transmission

# EXHIBIT 31

**From:** Tim McMenamin <t.mcmenamin@pmgwellness.com>  
**Sent:** Saturday, June 25, 2016 4:35 PM  
**To:** Info <info@prestigeluxuryrentals.com>  
**Cc:** Carlos Duarte <carlos@prestigeluxuryrentals.com>  
**Subject:** Re: Bentley

---

Any word back from the owner? IF you want to let him know I'm willing to pay \$85,000 cash. Let me know what he thinks

Sent from my iPhone

> On Jun 23, 2016, at 6:34 PM, Info <info@prestigeluxuryrentals.com> wrote:

>

>

> Sir I will have the owner. Contact you.

>

>

> Very truly yours,

>

>

> Beth Lopez | Manager

> HQ ( 305) 513-9711

> TEL: (888) 513-9711

> FAX: (305) 513-9712

> Beth@prestigeluxuryrentals.com

> www.prestigeluxuryrentals.com

>

>

>

>

> -----Original Message-----

> From: Tim McMenamin [mailto:t.mcmenamin@pmgwellness.com]

> Sent: Thursday, June 23, 2016 6:07 PM

> To: Beth Lopez

> Subject: Bentley

>

> Beth would prestige consider selling the Bentley to me? I would not be financing. I would pay for the car in cash in order to seek a better offer.

>

> Sent from my iPhone

# EXHIBIT 32

**From:** Steve Schaller <steve@elevenjames.com>  
**Sent:** Thursday, October 20, 2016 12:20 PM  
**To:** t.mcmenamin@pmgwellness.com; s.kothari@pmgwellness.com  
**Subject:** Eleven James

---

Hi Dr. McMenamin - Thank you again for the time today, very much appreciated the call, and getting to explain Eleven James.

Dr. Kothari - Pleasure meeting you via email, and I look forward to hopefully speaking with and working with you as well.

As discussed, I definitely think the best option for you guys to get started, would be to go with the Aficionado Collection, on a 6 watch/year plan (each watch for 2 months). You can also feel free to upgrade/downgrade for specific watches/just for 2 month rotations, as you wish, so you can always change this to get watches from the higher Collections later.

Pricing on the Aficionado 6x2 membership is \$369/month, with an additional \$31.25/month service fee (total of \$400.25/month). To get started, please simply fill in the Application here, for the Aficionado 6x2 membership.

Beyond that, I will get you all set up on this end, and look forward to getting you in your first watch with us ASAP. If you have any questions at all, please don't hesitate to reach out via email, text, or call at 518-275-9111.

Best,  
Steve



**ELEVEN JAMES**

**STEVE SCHALLER**

steve@elevenjames.com

**Direct:** 518.275.9111

**Concierge:** 855-ELEVEN-J

www.elevenjames.com

# EXHIBIT 33

**From:** concierge@elevenjames.com on behalf of  
Eleven James Concierge <concierge@elevenjames.com>  
**Sent:** Thursday, October 20, 2016 2:39 PM  
**To:** t.mcmenamin@pmgwellness.com  
**Cc:** steve@elevenjames.com  
**Subject:** Welcome to Eleven James

---



Hi Tim,

Thank you for your Application, and welcome to Eleven James! Your Membership entitles you to 6 watches from our Aficionado Collection, one every 2 months.

Your membership fees will be \$369.00/month (price includes NY state taxes if applicable) with an additional \$31.25/month service fee. For your information, please see our Terms and Conditions and Collection Coverage Information. Please also take a moment to print out and use our Wrist Measuring Tool as all of your watches will come set to your wrist size.

Thank you again for your Application. **Please respond back to this email with a good date and time to speak with a member of our Concierge Team.** Our Concierge will finalize your watch profile and answer any outstanding questions related to your Application.

Once again, welcome to Eleven James!

Thanks and best,

**Eleven James Concierge Team**

concierge@elevenjames.com

Concierge: 855-ELEVEN-J

www.elevenjames.com

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*Eleven James is an exclusive annual membership club to enjoy the world's finest timepieces without the confines of ownership*

# EXHIBIT 34

**From:** Tim McMenamin <t.mcmenamin@pmgwellness.com>  
**Sent:** Friday, October 21, 2016 11:39 AM  
**To:** Shue Kothari <s.kothari@pmgwellness.com>  
**Subject:** Re: Hola!

---

Did u already talk to the watch guys and pick ur watches?

Sent from my iPhone

On Oct 21, 2016, at 10:37 AM, Shue Kothari <s.kothari@pmgwellness.com> wrote:

BOOOOMM!!!

*Your Partner in Wellness,*

**Dr. Shue Kothari**  
**CEO**

<pmg-logo-500px-white.png>

**3060 Peachtree Road, Suite 965 Atlanta, GA 30305**

(Local) (888) 373-7923 | (Cell) 404-423-6840  
(Email) S.Kothari@PMGWellness.com | (Website) www.pmgwellness.com

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On Fri, Oct 21, 2016 at 11:37 AM, Tim McMenamin <t.mcmenamin@pmgwellness.com> wrote:  
Of course! They will be complete Sunday

Sent from my iPhone

On Oct 21, 2016, at 10:29 AM, Shue Kothari <s.kothari@pmgwellness.com> wrote:

Can you get me the results for the following 4 patients:

- 1) D'ante Foster: DOB: [REDACTED], Male, DOS: 5-6-2016: Food/Air
- 2) James Watkins: DOB: [REDACTED], Male, DOS: 4/1/2016: Food/Air
- 3) Theresa Holladay: DOB: [REDACTED], Female, DOS: 4/29/2016: Food/Air
- 4) Christina Sabedra: DOB: [REDACTED], Femail, DOS: 4/29/2016: Food/Air

The files will be the clinic with Aavani to send out.. If you could go by the clinic and drop them off over the weekend, that would be great!

Thanks!

*Your Partner in Wellness,*

**Dr. Shue Kothari**  
**CEO**

<pmg-logo-500px-white.png>

**3060 Peachtree Road, Suite 965 Atlanta, GA 30305**

(Local) (888) 373-7923 | (Cell) 404-423-6840  
(Email) S.Kothari@PMGWellness.com | (Website) www.pmgwellness.com

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# EXHIBIT 35

**From:** Gillian Gold <gillian@elevenjames.com>  
**Sent:** Tuesday, November 1, 2016 10:14 AM  
**To:** Tim McMenamin <t.mcmenamin@pmgwellness.com>  
**Subject:** Re: November Inventory

---

Hey Tim,

Sounds good! I've reserved the Breitling Transocean Chronograph (blue dial, blue strap) for you in November/December, followed by the Hublot Big Bang Evolution in January/February.

Let me know if this works for you!



**ELEVEN JAMES**

**GILLIAN GOLD**

Member Services

gillian@elevenjames.com

Concierge: 855-ELEVEN-J

www.elevenjames.com

On Tue, Nov 1, 2016 at 9:41 AM, Tim McMenamin <t.mcmenamin@pmgwellness.com> wrote:

Gillian- I am sending back today.... Sorry about the delay... I would like the hublot Big Bang evolution or the breitling transocean chrono blue dial blue strap... Either works great... Thanks

Sent from my iPhone

On Oct 28, 2016, at 3:00 PM, Gillian Gold <gillian@elevenjames.com> wrote:

Hey Tim,

Per our call, here is a list of Aficionado watches that are available to reserve for the November rotation. Let me know what if anything catches your eye.

<u>Blancpain Villeret</u>
<u>Breitling Chronomat 41 (black dial, two-tone)</u>
<u>Breitling Navitimer World (black dial, brown strap)</u>
<u>Breitling Navtimer World (Blue dial, ss bracelet)</u>
<u>Breitling Transocean Chronograph (blue dial, blue</u>
<u>Cartier Ballon Bleu Chronograph (black dial, ss</u>
<u>Cartier Calibre de Cartier Diver (black dial, rubber</u>
<u>Cartier Roadster Chronograph (white dial, ss</u>

bracelet)

Chopard Grand Prix de Monaco Historique (grey dial,

Clerc Hydroscaaph H1 Chronometer (black dial, blue

Clerc Hydroscaaph H1 Chronometer (silver dial, blue

Clerc Hydroscaaph GMT Power-Reserve (blue dial,

Girard-Perregaux Traveller Moonphase (black dial)

Girard-Perregaux Traveller Moonphase (silver dial)

Glashutte Original Senator Sixties Chronograph

Graham Swordfish Grillo GMT

Hublot Big Bang Evolution

Hublot Classic Fusion Black Carbon Fiber (black dial,

IWC Pilot's Chronograph Top Gun Miramar

IWC Pilot's Vintage Watch Hand Wound

IWC Pilot's Worldtimer

IWC Portofino Hand Wound 8-Days (white dial)

IWC Portuguese Automatic 7 Day (black dial, black

IWC Portuguese Automatic 7-Day Power Reserve

IWC Portuguese Automatic Chronograph (black dial,

IWC Portuguese Chronograph (black dial, brown

Jaeger-LeCoultre Grande Reverso (dual date)

Jaeger-LeCoultre Grande Reverso (manual wind)

Jaeger-LeCoultre Master Compressor Diving GMT

Jaeger-LeCoultre Master Grand Ultra Thin

Maurice Lacroix Masterpiece Calendrier Retrograde

Omega Seamaster Planet Ocean Co-Axial

Omega Speedmaster HB-SIA Co-Axial GMT

Panerai PAM 048 Luminor Marina (black dial, leather

Panerai PAM 104 Luminor Marina (black dial, black

Panerai PAM 292 Radiomir Black Seal Ceramic (2)

(black dial, leather strap)

Panerai PAM 328 Luminor Marina (black dial, ss

Panerai PAM 359 Luminor 1950 (black dial, leather

Panerai PAM 523 Luminor Marina 1950 (white dial,

Rolex Datejust II (silver dial, smooth bezel, arabic

Rolex Datejust II (white dial, wq fluted bezel, sticks)

Rolex Explorer II (black dial)

Rolex GMT Master II "Coke" (leather strap)

Rolex Milgauss (blue dial, green crystal)

Rolex Submariner "Hulk"

Zenith Pilot Type 20 GMT



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Member Services

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