



2001 E. Lohman Avenue.

3. On or about April 13, 2009, in Las Cruces, New Mexico, the defendant opened a Bank of America account in the name of Healthy Steps. The defendant identified himself as Healthy Steps' CFO.

4. By email sent on or about May 19, 2009, Trailblazers approved Healthy Steps' request for a National Provider Identifier and references a practice location at 8307 Constitution Avenue NE, Albuquerque, New Mexico 87120.

5. On or about May 20, 2009, a Medicare Enrollment Application (Form CMS-8551) was completed in the name of Gary L. Wood, M.D. The form provides a contact address of 2001 E. Lohman Avenue # 339, Las Cruces, New Mexico 88001 and a practice address of Healthy Steps, 8307 Constitution Avenue NE, Albuquerque, New Mexico 87120. Gary L. Wood, M.D. is a medical doctor who practices in Tucson, Arizona, and he did not authorize, and was unaware, that a Medicare Enrollment Application form was submitted in his name on or about May 20, 2009.

6. On or about May 20, 2009, an Electronic Funds Transfer (EFT) Authorization Agreement (Form CMS-588) was submitted in the name of Gary L. Wood, M.D., authorizing Trailblazers to make EFTs to the Bank of America account the defendant opened in the name of Healthy Steps. Gary L. Wood, M.D. did not authorize, and was unaware, that an EFT authorization agreement was submitted in his name on or about May 20, 2009.

7. On or about June 11, 2009, Trailblazers approved the unauthorized May 20, 2009, EFT Authorization Agreement.

Execution of the Scheme and Artifice to Defraud

8. Between June and October 2009, Healthy Steps electronically submitted to Trailblazers 575 claims for 192 beneficiaries, requesting a total of approximately \$847,597 in Medicare payments to Gary L. Wood, M.D., purportedly doing business as Healthy Steps. Gary L. Wood, M.D. was unaware of these claims, was not a physician associated in any way with the beneficiaries in whose name the claims were made, and did not authorize in any way the claims.

9. From on or about September 17, 2009, through on or about November 10, 2009, these dates being inclusive, Trailblazers approved claims made in the name of Gary L. Wood, M.D., purportedly doing business as Healthy Steps, totaling approximately \$270,460.96 and paid them out by EFT to the Bank of America account the defendant opened in the name of Healthy Steps.

In violation of 18 U.S.C. § 1347.

Counts 2-31

10. The allegations set out in paragraphs 1 through 9 of this Indictment are realleged and incorporated herein by reference.

11. On or about the dates listed for each count below, in the District of New Mexico in Dona Ana County and elsewhere, the defendant devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowingly transmitted and caused to be transmitted in interstate commerce,

by means of wire communications, certain writings, signs, signals, and sounds comprised of the following electronic funds transfers from Trailblazers to the Bank of America bank account the defendant opened in the name of Healthy Steps, as follows:

COUNT	DATE	DOLLAR AMOUNT
2	September 17, 2009	\$2,860.26
3	September 18, 2009	\$3,477.37
4	September 22, 2009	\$3,017.42
5	September 23, 2009	\$2,287.30
6	September 24, 2009	\$2,536.87
7	September 25, 2009	\$4,094.77
8	September 28, 2009	\$1,898.04
9	October 1, 2009	\$3,473.55
10	October 2, 2009	\$6,369.38
11	October 5, 2009	\$286.65
12	October 9, 2009	\$3,121.53
13	October 13, 2009	\$10,456.22
14	October 14, 2009	\$5,980.22
15	October 16, 2009	\$6,274.41
16	October 20, 2009	\$12,374.80
17	October 21, 2009	\$9,635.03
18	October 22, 2009	\$621.81
19	October 23, 2009	\$18,624.30
20	October 26, 2009	\$461.69
21	October 27, 2009	\$21,757.98
22	October 28, 2009	\$16,185.25
23	October 29, 2009	\$1,240.92

24	October 30, 2009	\$18,277.69
25	November 2, 2009	\$18,107.19
26	November 3, 2009	\$21,587.78
27	November 4, 2009	\$14,889.02
28	November 5, 2009	\$15,121.47
29	November 6, 2009	\$16,205.65
30	November 9, 2009	\$13,931.71
31	November 10, 2009	\$15,304.68
	TOTAL	\$270,460.96

In violation of 18 U.S.C. § 1343.

Count 32

12. From on or about May 19, 2009, through on or about October 21, 2009, in Dona Ana County in the District of New Mexico and elsewhere, the defendant did knowingly possess and use, without lawful authority, a means of identification, specifically, Medicare provider identifier information unique to Gary L. Wood, M.D., which the defendant knew at the time belonged to Gary L. Wood, a real person, during and in relation to a violation of 18 U.S.C. § 1343, wire fraud, by knowingly utilizing the Medicare provider identifier information unique to Gary L. Wood, M.D. to defraud Medicare by knowingly transmitting and causing to be transmitted in interstate commerce, by means of wire communications, certain writings, signs, signals, and sounds comprised of electronic funds transfers from Trailblazers to the Bank of America bank account the defendant opened in the name of Healthy Steps.

In violation of 18 U.S.C. § 1028A.

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

G. C. Drake  
Assistant United States Attorney

11/06/09(11:01am)