

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

INDICTMENT FOR CONSPIRACY TO COMMIT HEALTH CARE FRAUD,  
CONSPIRACY TO DEFRAUD THE UNITED STATES AND TO RECEIVE AND PAY  
HEALTH CARE KICKBACKS, AGGRAVATED IDENTITY THEFT,  
AND FORFEITURE

UNITED STATES OF AMERICA	:	CRIMINAL NO. 10-104-FJP-SCR
	:	
VERSUS	:	18 U.S.C. § 1349
	:	18 U.S.C. § 371
HENRY L. JONES	:	18 U.S.C. § 1028A
CHIKENNA D. JONES	:	18 U.S.C. § 2
SOFJAN M. LAMID	:	18 U.S.C. § 982
JO A. FRANCIS	:	
KAREN T. RAYBURN	:	
MARY H. GRIFFIN	:	
RODNEY D. TAYLOR	:	
STEPHANIE V. DANGERFIELD	:	
BONNIE W. SIMMONS	:	
MARY D. BESSIE	:	
FRED D. BELCHER	:	
BEULAH R. RICHARDSON	:	
STEPHANIE B. WILLIAMS	:	
ROBERT FOSTER	:	

THE GRAND JURY CHARGES

General Allegations

At all times relevant to this Indictment:

1. The Medicare Program ("Medicare") was a federal program that provided free or below-cost health care benefits to certain individuals, primarily the elderly, blind, and disabled. The benefits available under Medicare are prescribed by statute and by federal regulations under the auspices of the United States Department of Health and Human Services ("HHS"), through its agency, the Centers for Medicare and Medicaid Services ("CMS"). Individuals who received

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benefits under Medicare were commonly referred to as Medicare “beneficiaries.”

2. Medicare was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b).

3. Part B of the Medicare Program was a medical insurance program that covered, among other things, certain durable medical equipment (“DME”).

4. For Louisiana beneficiaries, Medicare Part B insurance covering DME and related health care benefits, items, and services was administered by Cigna Government Services (“Cigna”), pursuant to a contract with HHS. Among Cigna’s responsibilities, it received, adjudicated, and paid the claims submitted to it by Medicare beneficiaries, physicians, and suppliers of health care items and services.

5. DME companies, physicians, and other health care providers that sought to participate in Medicare Part B and bill Medicare for the cost of DME and related benefits, items, and services were required to apply for and receive a “supplier number.” The supplier number allowed a DME company to submit bills, known as “claims,” to Medicare to obtain reimbursement for the cost of DME and related health care benefits, items, and services that a DME company had supplied to beneficiaries.

6. To receive payment from Medicare, a DME company, using its supplier number, would submit a health insurance claim form, known as a CMS-1500. Medicare permitted DME companies to submit a CMS-1500 electronically or by way of a paper claim form. The CMS-1500 required DME companies to provide certain information, including: (a) the Medicare beneficiary’s name; (b) the Medicare beneficiary’s identification number; (c) the name and identification number of the doctor who ordered the item or service that was the subject of the claim; (d) the health care

benefits, items, or services that were supplied or provided to the beneficiary; (e) the billing codes for these benefits, items, or services; and (f) the date upon which the benefits, items, or services were provided.

7. Medicare, through Cigna, would generally pay a substantial portion of the cost of the DME or related health care benefits, items, and services if they were medically necessary and ordered by licensed doctors or other licensed, qualified health care providers.

8. Payments under Medicare Part B were often made directly to the DME company. For this to occur, the beneficiary would assign the right of payment to the DME company or other health care provider. Once such an assignment took place, the DME company or other health care provider would assume the responsibility for submitting claims to, and receiving payments from, Medicare.

9. Healthcare 1, LLC ("Healthcare 1") was incorporated in the State of Louisiana on or about June 27, 2003, and was purportedly engaged in the business of providing DME to Medicare beneficiaries. Healthcare 1 had a Medicare provider number, and was eligible to receive payments from Medicare for DME supplied to beneficiaries, if the DME was medically necessary.

10. Lifeline Healthcare Services, Inc. ("Lifeline") was incorporated in the State of Louisiana on or about December 29, 2004, and was purportedly engaged in the business of providing DME to Medicare beneficiaries. Lifeline had a Medicare provider number, and was eligible to receive payments from Medicare for DME supplied to beneficiaries, if the DME was medically necessary.

11. Medical 1 Patient Services, LLC ("Medical 1") was incorporated in the State of Louisiana on or about February 23, 2007, and was purportedly engaged in the business of providing DME to Medicare beneficiaries. Medical 1 had a Medicare provider number, and was eligible to



receive payments from Medicare for DME that was supplied to beneficiaries, if the DME was medically necessary.

12. Defendant **HENRY L. JONES** was a corporate officer for and operator of Healthcare 1, Lifeline, and Medical 1. **HENRY L. JONES** paid kickbacks to patient recruiters **KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, BONNIE W. SIMMONS, MARY D. BESSIE, FRED D. BELCHER, BEULAH R. RICHARDSON, STEPHANIE B. WILLIAMS, ROBERT FOSTER** and others in exchange for the names and billing information of Medicare beneficiaries, as well as fraudulent prescriptions, for the purpose of billing the Medicare program for medically unnecessary DME through Healthcare 1, Lifeline, and Medical 1.

13. Defendant **CHIKENNA D. JONES** was a corporate officer for and operator of Healthcare 1, Lifeline, and Medical 1. **CHIKENNA D. JONES** paid kickbacks to patient recruiters **KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, BONNIE W. SIMMONS, MARY D. BESSIE, FRED D. BELCHER, BEULAH R. RICHARDSON, STEPHANIE B. WILLIAMS, ROBERT FOSTER** and others in exchange for the names and billing information of Medicare beneficiaries, as well as fraudulent prescriptions, for the purpose of billing the Medicare program for medically unnecessary DME through Healthcare 1, Lifeline, and Medical 1.

14. Defendant **SOFJAN M. LAMID** was a doctor licensed by the State of Louisiana who wrote prescriptions ordering medically unnecessary DME for Medicare beneficiaries, for the purpose of having Healthcare 1 and Medical 1 submit claims to Medicare and receive payments from Medicare.

15. Defendant **JO A. FRANCIS** was a doctor licensed by the State of Mississippi who wrote prescriptions ordering medically unnecessary DME for Medicare beneficiaries, for the purpose of having Healthcare 1 and Medical 1 submit claims to Medicare and receive payments from Medicare.

16. Defendant **KAREN T. RAYBURN** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1, Lifeline, and Medical 1, for the purpose of having those companies submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

17. Defendant **MARY H. GRIFFIN** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1 and Medical 1, for the purpose of having those companies submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

18. Defendant **RODNEY D. TAYLOR** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1 and Medical 1, for the purpose of having those companies submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

19. Defendant **STEPHANIE V. DANGERFIELD** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1 and Medical 1, for the purpose of having those companies submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

20. Defendant **BONNIE W. SIMMONS** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1 and Lifeline, for the purpose of having those companies submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

21. Defendant **MARY D. BESSIE** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1, Lifeline, and Medical 1, for the purpose of having those companies submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

22. Defendant **FRED D. BELCHER** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1, for the purpose of having that company submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

23. Defendant **BEULAH R. RICHARDSON** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1 and Medical 1, for the purpose of having those companies submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

24. Defendant **STEPHANIE B. WILLIAMS** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1, for the purpose of having that company submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

25. Defendant **ROBERT FOSTER** was a patient recruiter who referred Medicare beneficiaries to Healthcare 1, for the purpose of having that company submit claims for medically unnecessary DME to Medicare and receive payments from Medicare.

**COUNT 1**  
**Conspiracy to Commit Health Care Fraud**  
**(18 U.S.C. § 1349)**

26. Paragraphs 1 through 25 of this Indictment are realleged and incorporated as though fully set forth herein.

27. Beginning on or about June 24, 2004, and continuing through on or about



October 8, 2009, in the Middle District of Louisiana, and elsewhere, the defendants,

**HENRY L. JONES,  
CHIKENNA D. JONES,  
SOFJAN M. LAMID,  
JO A. FRANCIS,  
KAREN T. RAYBURN,  
MARY H. GRIFFIN,  
RODNEY D. TAYLOR,  
STEPHANIE V. DANGERFIELD,  
BONNIE W. SIMMONS,  
MARY D. BESSIE,  
FRED D. BELCHER,  
BEULAH R. RICHARDSON,  
STEPHANIE B. WILLIAMS,  
and  
ROBERT FOSTER,**

did knowingly and willfully combine, conspire, confederate and agree with each other and with others, known and unknown to the Grand Jury, to commit health care fraud, that is, to execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347.

**Object of the Conspiracy**

28. It was the object of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) submitting and causing the submission of false and fraudulent claims to Medicare; (b) concealing the submission of false and fraudulent claims to Medicare and the receipt and transfer of the proceeds of the fraud; and (c) diverting the proceeds

of the fraud for their own personal use and benefit and for the use and benefit of others.

**Manner and Means of the Conspiracy**

The manner and means by which the defendants and their co-conspirators sought to accomplish the object of the conspiracy included, among others, the following:

29. Defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would maintain a valid Medicare group provider number for Healthcare 1, Lifeline, and Medical 1 in order to submit Medicare claims for DME that were medically unnecessary.

30. Defendant **SOFJAN M. LAMID** would provide prescriptions to patient recruiters for medically unnecessary DME that would serve as the basis for Healthcare 1 and Medical 1 to bill the Medicare program.

31. Defendant **JO A. FRANCIS** would provide prescriptions to patient recruiters for medically unnecessary DME that would serve as the basis for Healthcare 1 and Medical 1 to bill the Medicare program.

32. Defendant **CHIKENNA D. JONES** would obtain sole signature authority for a corporate bank account of Healthcare 1, Hibernia National Bank account number xxxxxx3316.

33. Defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would obtain sole signature authority for a corporate bank account of Healthcare 1, Chase Bank account number xxxxx9145.

34. Defendants **KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, BONNIE W. SIMMONS, MARY D. BESSIE, FRED D. BELCHER, BEULAH R. RICHARDSON, STEPHANIE B. WILLIAMS, ROBERT FOSTER**, and others would recruit Medicare beneficiaries for the purpose of Healthcare 1 filing



claims with Medicare for medically unnecessary DME.

35. Beginning at least on or about September 30, 2004, and continuing through on or about September 29, 2009, defendants **HENRY L. JONES, CHIKENNA D. JONES, SOFJAN M. LAMID, JO A. FRANCIS, KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, BONNIE W. SIMMONS, MARY D. BESSIE, FRED D. BELCHER, BEULAH R. RICHARDSON, STEPHANIE B. WILLIAMS, ROBERT FOSTER**, and others, through Healthcare 1, would submit, and cause the submission of, approximately \$18.9 million in Medicare claims that falsely and fraudulently represented that various health care benefits, items, and services were medically necessary.

36. As a result of the submission of these fraudulent claims, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would receive Medicare payments made to Healthcare 1 based on the false and fraudulent claims. Those payments were deposited into the corporate bank accounts of Healthcare 1, Hibernia National Bank account number xxxxxx3316 and Chase Bank account number xxxxx9145.

37. Defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would then transfer and disburse, and cause to be transferred and disbursed, monies from Healthcare 1's corporate accounts to themselves and others, including defendants **KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, BONNIE W. SIMMONS, MARY D. BESSIE, FRED D. BELCHER, BEULAH R. RICHARDSON, STEPHANIE B. WILLIAMS, and ROBERT FOSTER**.

38. Defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would obtain sole signature authority for a corporate bank account of Lifeline, Whitney National Bank account number

xxxxx0664.

39. Defendant **HENRY L. JONES** would obtain sole signature authority for a corporate bank account of Lifeline, American Gateway Bank account number xxx0041.

40. Defendants **KAREN T. RAYBURN, BONNIE W. SIMMONS, MARY D. BESSIE**, and others would recruit Medicare beneficiaries for the purpose of Lifeline filing claims with Medicare for medically unnecessary DME.

41. Beginning at least on or about April 6, 2005, and continuing through on or about August 29, 2006, defendants **HENRY L. JONES, CHIKENNA D. JONES, KAREN T. RAYBURN, BONNIE W. SIMMONS, MARY D. BESSIE**, and others, through Lifeline, would submit, and cause the submission of, approximately \$1.2 million in Medicare claims that falsely and fraudulently represented that various health care benefits, items, and services were medically necessary.

42. As a result of the submission of these fraudulent claims, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would receive Medicare payments made to Lifeline based on the false and fraudulent claims. Those payments were deposited into the corporate bank accounts of Lifeline, Whitney National Bank account number xxxxx0664 and American Gateway Bank account number xxx0041.

43. Defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would then transfer and disburse, and cause to be transferred and disbursed, monies from Lifeline's corporate account to themselves and others, including defendants **KAREN T. RAYBURN, BONNIE W. SIMMONS**, and **MARY D. BESSIE**.

44. On or about June 12, 2009, defendants **HENRY L. JONES** and **CHIKENNA D.**



**JONES** would obtain sole signature authority for a corporate bank account of Medical 1, JP Morgan Chase Bank account number xxxxx9068.

45. Defendants **KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, MARY D. BESSIE, BEULAH R. RICHARDSON** and others would recruit Medicare beneficiaries for the purpose of Medical 1 filing claims with Medicare for medically unnecessary DME.

46. Beginning at least on or about May 5, 2009, and continuing through on or about October 5, 2009, defendants **HENRY L. JONES, CHIKENNA D. JONES, SOFJAN M. LAMID, JO A. FRANICS, KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, MARY D. BESSIE, BEULAH R. RICHARDSON** and others, through Medical 1, would submit, and cause the submission of, approximately \$1.2 million in Medicare claims that falsely and fraudulently represented that various health care benefits, items, and services were medically necessary.

47. As a result of the submission of these fraudulent claims, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would receive Medicare payments made to Medical 1 based on the false and fraudulent claims. Those payments were deposited into the corporate bank account of Medical 1, JP Morgan Chase Bank account number xxxxx9068.

48. Defendants **HENRY L. JONES** and **CHIKENNA D. JONES** would then transfer and disburse, and cause to be transferred and disbursed, monies from Medical 1's corporate account to themselves and others, including defendants **KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, MARY D. BESSIE, BEULAH R. RICHARDSON**.



### Overt Acts

In furtherance of the conspiracy, and to accomplish its object, the conspirators committed and caused to be committed, in the Middle District of Louisiana, the following overt acts, among others:

49. Beginning at least on or about September 30, 2004, and continuing through on or about September 29, 2009, defendants **HENRY L. JONES, CHIKENNA D. JONES, SOFJAN M. LAMID, JO A. FRANCIS, KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, BONNIE W. SIMMONS, MARY D. BESSIE, FRED D. BELCHER, BEULAH R. RICHARDSON, STEPHANIE B. WILLIAMS, ROBERT FOSTER**, and others, through Healthcare 1, would submit, and cause the submission of, approximately \$18.9 million in Medicare claims that falsely and fraudulently represented that various health care benefits, items, and services were medically necessary.

50. Beginning at least on or about April 6, 2005, and continuing through on or about August 29, 2006, defendants **HENRY L. JONES, CHIKENNA D. JONES, KAREN T. RAYBURN, BONNIE W. SIMMONS, MARY D. BESSIE**, and others, through Lifeline, would submit, and cause the submission of, approximately \$1.2 million in Medicare claims that falsely and fraudulently represented that various health care benefits, items, and services were medically necessary.

51. Beginning at least on or about May 5, 2009, and continuing through on or about October 5, 2009, defendants **HENRY L. JONES, CHIKENNA D. JONES, SOFJAN M. LAMID, JO A. FRANCIS, KAREN T. RAYBURN, MARY H. GRIFFIN, RODNEY D. TAYLOR, STEPHANIE V. DANGERFIELD, MARY D. BESSIE, BEULAH R. RICHARDSON** and others, through Medical 1, would submit, and cause the submission of, approximately \$1.2 million in Medicare claims that falsely and fraudulently represented that various health care benefits, items,

and services were medically necessary.

The above is a violation of Title 18, United States Code, Sections 1349 and 2.

**COUNT 2**

**Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks  
(18 U.S.C. § 371)**

52. Paragraphs 1 through 25 of this Indictment are realleged and incorporated as though fully set forth herein.

53. Beginning at least on or about June 24, 2004, and continuing through at least on or about October 8, 2009, in the Middle District of Louisiana, and elsewhere, the defendants,

**HENRY L. JONES,  
CHIKENNA D. JONES,  
SOFJAN M. LAMID,  
JO A. FRANCIS,  
KAREN T. RAYBURN,  
MARY H. GRIFFIN,  
RODNEY D. TAYLOR,  
STEPHANIE V. DANGERFIELD,  
BONNIE W. SIMMONS,  
MARY D. BESSIE,  
FRED D. BELCHER,  
BEULAH R. RICHARDSON,  
STEPHANIE B. WILLIAMS,  
and  
ROBERT FOSTER,**

did knowingly and willfully combine, conspire, confederate and agree with each other and with others, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

- a. to defraud the United States by impairing, impeding, obstructing, and defeating through deceitful and dishonest means, the lawful government functions of the United States Department of Health and Human Services in its administration and oversight of the Medicare program;

- b. to knowingly and willfully solicit and receive remuneration, specifically kickbacks and bribes, directly and indirectly, overtly and covertly, in return for referring individuals for the furnishing and arranging for the furnishing of any item and service for which payment may be made in whole or in part by Medicare; and for the purchasing, leasing, ordering, and arranging for and recommending the purchasing, leasing, and ordering of any good, item, and service for which payment may be made in whole and in part by a Federal Health Care program, that is, Medicare, in violation of Title 42, United States Code, Section 1320a-7b(b)(1); and
- c. to knowingly and willfully offer and pay remuneration, specifically kickbacks and bribes, directly and indirectly, overtly and covertly, in return for referring individuals for the furnishing and arranging for the furnishing of any item and service for which payment may be made in whole or in part by Medicare; and for the purchasing, leasing, ordering, and arranging for and recommending the purchasing, leasing, and ordering of any good, item, and service for which payment may be made in whole and in part by a Federal Health Care program, that is, Medicare, in violation of Title 42, United States Code, Section 1320a-7b(b)(2)(B).

**Object Of The Conspiracy**

54. It was the object of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) offering, paying, and receiving kickbacks and bribes to obtain Medicare beneficiary information that was used as the basis for the submission of false and fraudulent claims to Medicare; (b) submitting and causing the submission of false and fraudulent claims to Medicare; (c) concealing the submission of false and fraudulent claims to Medicare and the receipt and transfer of the proceeds of the fraud; and (d) diverting the proceeds of



the fraud for their own personal use and benefit and for the use and benefit of others.

**Manner and Means of the Conspiracy**

Paragraphs 29 through 48 of the Manners and Means Section of Count 1 of this indictment are realleged and incorporated as though fully set forth herein.

**Overt Acts**

In furtherance of the conspiracy, and to accomplish its object, the conspirators committed and caused to be committed, in the Middle District of Louisiana, the following overt acts, among others:

55. On or about June 24, 2004, defendant **CHIKENNA D. JONES** obtained sole signature authority for a corporate bank account of Healthcare 1, Hibernia National Bank account number xxxxxx3316.

56. On or about January 20, 2006, defendant **HENRY L. JONES** obtained sole signature authority for a corporate bank account of Lifeline, American Gateway Bank account number xxx0041.

57. On or about April 9, 2007, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** obtained sole signature authority for a corporate bank account of Healthcare 1, Chase Bank account number xxxxx9145.

58. On or about June 12, 2009, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** obtained sole signature authority for a corporate bank account of Lifeline, Whitney National Bank account number xxxxx0664.

59. On or about June 12, 2009, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** obtained sole signature authority for a corporate bank account of Medical 1, JP Morgan Chase Bank account number xxxxx9068.

60. On or about October 19, 2007, defendants **HENRY L. JONES** and **CHIKENNA D.**

**JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$5,330 to defendant **STEPHANIE B. WILLIAMS** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

61. On or about October 26, 2007, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$5,400 to defendant **BONNIE W. SIMMONS** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

62. On or about July 3, 2008, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$11,000 to defendant **MARY H. GRIFFIN** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

63. On or about September 19, 2008, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$2,200 to defendant **ROBERT FOSTER** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

64. On or about October 2, 2008, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$6,000 to defendant **BEULAH R. RICHARDSON** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

65. On or about October 16, 2008, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$7,895 to defendant **RODNEY D. TAYLOR** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

66. On or about November 7, 2008, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$6,590 to defendant **STEPHANIE V. DANGERFIELD** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

67. On or about January 16, 2009, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$7,000 to defendant **FRED D. BELCHER** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

68. On or about March 20, 2009, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$8,725 to defendant **KAREN T. RAYBURN** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

69. On or about April 24, 2009, defendants **HENRY L. JONES** and **CHIKENNA D. JONES** paid, and caused the payment of, kickbacks in the amount of approximately \$3,500 to defendant **MARY D. BESSIE** for the referral of Medicare beneficiaries, and corresponding prescriptions, in whose names claims for DME would be submitted.

The above is a violation of Title 18, United States Code, Sections 371 and 2.

**COUNTS 3-6**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A)**

70. Paragraphs 1 through 25 of this Indictment are realleged and incorporated as though fully set forth herein.

71. On or about the dates specified as to each count below, in the Middle District of Louisiana, and elsewhere, the defendant,



**HENRY L. JONES,**

during and in relation to a felony violation of Title 18, United States Code, Section 1349 (conspiracy to commit health care fraud) knowingly transferred, possessed, and used, without lawful authority, means of identification of other persons, that is, physicians' names and Unique Provider Identification Numbers ("UPINs"), in that he submitted Medicare claims for approximately the below dollar amounts, and represented that, on or about the below dates of service, the below DME suppliers had provided the below DME to Medicare beneficiaries pursuant to the below physicians' orders or prescriptions:

Count	Date claim is submitted	DME Supplier	Physician	UPIN (last 3 digits)	Date of Purported Service	Item Claimed (Code)	Claimed Amount
3	05/02/07	Healthcare 1	S.W.	093	04/27/07	Knee orthosis (L1845)	\$1,500
4	06/08/09	Medical 1	G.T.	610	03/23/09	Lumbar-sacral orthosis (L0631)	\$1,028
5	06/09/09	Medical 1	S.G.	046	05/01/09	Power Wheelchair for Individuals Weighing 300-450 lbs. (K0823), Battery (E2361), and Armrest (E0973)	\$5,040
6	09/25/09	Medical 1	A.S.	757	09/24/09	Power Wheelchair for Individuals Weighing up to 300 lbs. (K0822), Battery (E2361), Armrest (E0973), and Seat Belt (E0978)	\$5,080

Each of the above is a violation of Title 18, United States Code, Sections 1028A and 2.

**Forfeiture Allegation**

72. Paragraphs 1 through 69 of this indictment are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants have an interest pursuant to the provisions of Title 18,

United States Code, Section 982(a)(7) and the procedures outlined at Title 21, United States Code, Section 853.

73. Upon conviction of Counts 1 and 2 of this indictment, defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

74. The property that is subject to forfeiture includes, but is not limited to, the following:

- a. A money judgment in the amount of up to the gross proceeds of the health care fraud offenses set forth in Counts 1 and 2 of the indictment;
- b. All funds on deposit at Hibernia National Bank, account number 2080293316, in the name of Healthcare 1, LLC;
- c. All funds on deposit at Chase Bank, account number 724519145, in the name of Healthcare 1, LLC;
- d. All funds on deposit at Whitney National Bank, account number 713980664, in the name of Lifeline Healthcare Services, Inc.;
- e. All funds on deposit at American Gateway Bank, account number 0270041, in the name of Lifeline Healthcare Services, Inc.; and
- f. All funds on deposit at JP Morgan Chase Bank, account number 822639068, in the name of Medical 1 Patient Services, LLC.

75. If, as a result of any act or omission of the defendants, the property described above that is subject to forfeiture,

- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as made applicable by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.


All pursuant to Title 18, United States Code, Sections 982(a)(7) and 982(b) and the procedures outlined at Title 21, United States Code, Section 853.

UNITED STATES OF AMERICA, by

**A TRUE BILL**

  
DONALD J. CAZAYOUX, JR.  
UNITED STATES ATTORNEY  
MIDDLE DISTRICT OF LOUISIANA

  
GRAND JURY FOREPERSON

  
O. BENTON CURTIS III  
TRIAL ATTORNEY  
CRIMINAL FRAUD SECTION  
DEPARTMENT OF JUSTICE

7/15/10  
DATE



Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name HENRY L. JONES

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Male** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_


\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 6 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 1028A</u>	<u>Aggravated Identity Theft</u>	<u>3, 4, 5, 6</u>
set 4	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	_____

Date: 07/15/10Signature of AUSA: 

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name CHIKENNA D. JONES

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Female** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: \_\_\_\_\_ DOJ Trial Attorney: **O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	_____

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name SOFJAN M. LAMID

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Male** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	_____

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_



Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name JO A. FRANCIS

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_

SS #: \_\_\_\_\_

Sex: **Female**

Race \_\_\_\_\_

Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis**Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	_____

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name KAREN T. RAYBURN

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Female** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	<u></u>

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name MARY H. GRIFFIN

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_

SS #: \_\_\_\_\_

Sex: **Female**

Race \_\_\_\_\_

Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	

Date: 07/15/10Signature of AUSA: *O. Benton Curtis*

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_



Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name RODNEY D. TAYLOR

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_

SS #: \_\_\_\_\_

Sex: **Male**

Race \_\_\_\_\_

Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	_____

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name STEPHANIE V. DANGERFIELD

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Female** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: \_\_\_\_\_ DOJ Trial Attorney: **O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	

Date: 07/15/10Signature of AUSA: *O. Benton Curtis*

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name BONNIE W. SIMMONS

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Female** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	_____

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_



Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name MARY D. BESSIE

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_

SS #: \_\_\_\_\_

Sex: **Female**

Race \_\_\_\_\_

Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: **DOJ Trial Attorney: O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	

Date: 07/15/10Signature of AUSA: *O. Benton Curtis*

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name FRED D. BELCHER

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Male** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: \_\_\_\_\_ DOJ Trial Attorney: **O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ FelonyIndex Key/CodeDescription of Offense ChargedCount(s)set 1 18 U.S.C. § 1349 Conspiracy to Commit Health Care Fraud 1set 2 18 U.S.C. § 371 Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks 2set 3 18 U.S.C. § 982 Forfeiture \_\_\_\_\_Date: 07/15/10Signature of AUSA: *O. Benton Curtis*

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name BEULAH R. RICHARDSON

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Female** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: \_\_\_\_\_ DOJ Trial Attorney: **O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	<u></u>

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_



Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name STEPHANIE B. WILLIAMS

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: Female Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: \_\_\_\_\_ DOJ Trial Attorney: O. Benton Curtis Bar # 21442 (TN)Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: Baton Rouge, LA

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: \_\_\_\_\_ ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	<u>                    </u>

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Place of Offense: Baton Rouge, LAMatter to be sealed: ☐ No ☒ YesCity Baton Rouge, LA

## Related Case Information:

County/Parish East Baton Rouge Parish

Superseding Indictment \_\_\_\_\_ Docket Number \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant ☒

Agencies: Federal Bureau of Investigation

Magistrate Case Number \_\_\_\_\_

U.S. Dept. Of Health &amp; Human Services-OIG/OI

Search Warrant Case No. \_\_\_\_\_

Louisiana Attorney General's Office

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

## Defendant Information:

Defendant Name ROBERT FOSTER

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birth date: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: **Male** Race \_\_\_\_\_ Nationality \_\_\_\_\_

## U.S. Attorney Information:

AUSA: \_\_\_\_\_ DOJ Trial Attorney: **O. Benton Curtis** Bar # **21442 (TN)**Interpreter: ☒ No ☐ Yes List language and/or dialect: \_\_\_\_\_Location Status: **Baton Rouge, LA**

Arrest Date \_\_\_\_\_

\_\_\_\_\_ Already in Federal Custody as of \_\_\_\_\_

\_\_\_\_\_ Already in State Custody

\_\_\_\_\_ On Pretrial Release

Total # of Counts: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
set 1	<u>18 U.S.C. § 1349</u>	<u>Conspiracy to Commit Health Care Fraud</u>	<u>1</u>
set 2	<u>18 U.S.C. § 371</u>	<u>Conspiracy to Defraud the United States and to Receive and Pay Health Care Kickbacks</u>	<u>2</u>
set 3	<u>18 U.S.C. § 982</u>	<u>Forfeiture</u>	<u>                    </u>

Date: 07/15/10Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA  
*GRAND JURY RETURN*

UNITED STATES OF AMERICA

VERSUS

CRIMINAL

NO. 10-104 - RJP-SCR

HENRY L. JONES  
CHIKENNA D. JONES  
SOFJAN M. LAMID  
JO A. FRANCIS  
KAREN T. RAYBURN  
MARY H. GRIFFIN  
RODNEY D. TAYLOR  
STEPHANIE V. DANGERFIELD  
BONNIE W. SIMMONS  
MARY D. BESSIE  
FRED D. BELCHER  
BEULAH R. RICHARDSON  
STEPHANIE B. WILLIAMS  
ROBERT FOSTER

PRESENT: **Ben Curtis**  
Assistant U. S. Attorney

Indictment filed into the record and arrest warrant issued for Henry L. Jones and

Fred D. Belcher.

\* \* \* \* \*