

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**INDICTMENT FOR CONSPIRACY, HEALTH CARE FRAUD AND  
UTTERING FORGED SECURITIES**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
VERSUS	*	SECTION:
MELANIE NEWMAN	*	VIOLATIONS: 18 USC §371
MICHAEL ANTHONY GOODLOE, JR.	*	18 USC §1347
	*	18 USC §513(a)
		18 USC §2

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**CONSPIRACY**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The Medical Center of Louisiana Foundation (MCLF) was a non-profit corporation located in New Orleans, Louisiana, that provided services to indigent individuals.
2. MCLF maintained general checking account number 812296xxx at Capital One (Capital One Account) to pay for medical equipment, medical supplies, and physician and nursing education.
3. **MELANIE NEWMAN (NEWMAN)** was employed at MCLF as a part-time bookkeeper. Her duties included handling all bookkeeping functions, preparing payment requests for MCLF expenses, preparing checks for signature and reconciling accounts.

4. **MICHAEL ANTHONY GOODLOE, JR. (GOODLOE)** resided at 2808 Crooked Creek Drive, Carrollton, Texas. **NEWMAN** resided at 2906 Prytania Street, Apt. 5, New Orleans, Louisiana.

5. **GOODLOE** and **NEWMAN** were married on July 3, 2008.

6. **GOODLOE** maintained Chase Bank account number 789051XXX under the name of "Michael Goodloe DBA Patient Care Solutions" and Chase Bank account number 753378XXX under the name of "Michael A. Goodloe, Jr."

**B. OBJECT OF THE CONSPIRACY:**

The principal objective of **GOODLOE** and **NEWMAN** was to use the funds of MCLF for their own personal gain.

**C. WAYS AND MEANS TO ACCOMPLISH THE CONSPIRACY:**

Throughout the existence of the conspiracy **NEWMAN** created checks made payable to vendors who had no legitimate business with the MCLF. **GOODLOE** created a fictitious company, Patient Care Solutions, and opened a checking account under the name of "Michael Goodloe d/b/a Patient Care Solutions." **GOODLOE** and **NEWMAN** used the funds to pay for personal items and expenses approximating \$220,603.65. Included in the items purchased or paid for were automobiles for **MICHAEL GOODLOE**, tuition and student loans for **MELANIE NEWMAN**, a wedding reception, photographs and favors for the defendants' wedding, clothing, utility bills, and housewares. The deposits into the Patient Care Solutions account were almost exclusively from MCLF and the disbursements consisted of personal expenses and large transfers of cash to other accounts of **GOODLOE** and/or **NEWMAN**.

None of these purchases or payments were known to the MCLF and no authority had been given to **NEWMAN** to withdraw these funds.

**D. THE CONSPIRACY**

Beginning in April 2008, and continuing until about October 2008, in the Eastern District of Louisiana and elsewhere, **MELANIE NEWMAN** and **MICHAEL ANTHONY**

**GOODLOE, JR.** and others known and unknown to the grand jury, willfully and knowingly did combine, conspire, confederate and agree together and with each other to knowingly and willfully devise and attempt to devise a scheme and artifice to defraud health care benefit programs, to-wit: the Medical Center of Louisiana Foundation, and to obtain, by means of false and fraudulent pretenses, representations, and promises, money owned by, and under the custody and control of, the Medical Center of Louisiana Foundation, in connection with the delivery of, and payment for, health care benefits and services, in violation of Title 18, United States Code, Section 1347.

**E. OVERT ACTS:**

In furtherance of the conspiracy and to accomplish the purposes thereof, **NEWMAN** and **GOODLOE** committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. On July 3, 2008, **NEWMAN** caused an electronic payment to be made from the MCLF Capital One Account in the amount of \$442.64 to Entergy Services account number 71114573 in the name of "Melanie L. Newman" to pay for utilities at 2906 Prytania Street, Apartment 5, in New Orleans, Louisiana.
2. In about September 2008, **GOODLOE** gave MCLF check number 6783 drawn on MCLF Capital One Account in the amount of \$18,000 bearing forged and false signatures to an individual in Texas for the purchase of a 2006 Toyota Avalon. When the seller of the automobile noted to **GOODLOE** that the check was a business check, **GOODLOE** told the seller that he owned MCLF and was purchasing the vehicle on behalf of MCLF.
3. On August 12, 2008, **NEWMAN** entered into a contract with The Alexander Mansion in Garland, Texas, for a wedding and reception for the marriage of **GOODLOE** and **NEWMAN** which was scheduled to occur on March 24, 2009. As a deposit **NEWMAN** gave The Alexander Mansion check number 6755 in the amount of \$7,000 bearing forged and false signatures drawn on the MCLF Capital One Account. **NEWMAN** also provided to The Alexander Mansion a letter on MCLF letterhead, containing the forged signature of "Everett J. Williams, Ph.D." which stated, "We'd like to give a wedding/going away gift to our intern, Melanie Newman. Please accept this check as payment towards her balance."
4. Between June 18, 2008, and October 2, 2008, purchases of televisions, a blue-ray disc player, computers and computer monitors, printers, software, digital cameras, furniture, bookcases and giftcards were made from Office Depot. The names and addresses on the invoices included **NEWMAN**, **GOODLOE**, and others known to **NEWMAN**.

5. On about July 24, 2008, MCLF check number 6724 in the amount of \$408.54 drawn on the Capital One Account bearing the forged and false signatures was tendered to Office Depot to pay for purchases made between June 18, 2008, and June 26, 2008.
6. On about August 6, 2008, MCLF check number 6745 in the amount of \$8,978.89 drawn on the Capital One Account bearing forged and false signatures was tendered to Office Depot to pay for purchases made between July 18, 2008, and August 23, 2008.
7. On or about September 12, 2008, MCLF check number 6777 in the amount of \$8,228.70 drawn on the Capital One Account bearing forged and false signatures was tendered to Office Depot to pay for purchases made between August 23, 2008, and August 30, 2008.
8. None of the merchandise purchased at Office Depot and paid for by MCLF check numbers 6724, 6745, and 6777 was delivered to or received by MCLF.
9. On or about August 11, 2008, **GOODLOE** deposited MCLF check number 6749 in the amount of \$1,875 payable to "Mike Goodloe" and bearing forged and false signatures into his Chase account number 753378XXX.
10. On or about August 14, 2008, **NEWMAN** placed an order via U.S. Mails to Beaucoup Favors, Inc. for gift items and wedding attendant favors. The order indicated the items were sold to, and to be delivered to, "Melanie Newman" at 2906 Prytania Street #5 in New Orleans, Louisiana. **NEWMAN** tendered MCLF check number 6720 in the amount of \$494.25 drawn on the Capital One Account bearing false and forged signatures.
11. On or about August 20, 2008, **NEWMAN** tendered MCLF check number 6762 in the amount of \$9,500 drawn on the Capital One Account bearing false and forged signatures to pay for her tuition at Loyola University where she was registered as a student.
12. On or about August 28, 2008, **NEWMAN** created false MCLF check number 6767 in the amount of \$738.59 drawn on the Capital One Account bearing false and forged signatures. The check was used to pay the utilities of **MELANIE NEWMAN**.
13. On or about August 29, 2008, **GOODLOE** deposited MCLF check number 6763 in the amount of \$2,250 payable to "Mike Goodloe" and bearing forged and false signatures into his Chase account number 789051XXX. The check was endorsed "Patient Care Solution" with a signature and the notation "owner."
14. On or about September 17, 2008, **GOODLOE** deposited MCLF check number 6776 in the amount of \$14,800 made payable to "Patient Care Solutions" and bearing forged and false signatures into his Chase account number 789051XXX.
15. On or about October 2, 2008, **GOODLOE** deposited MCLF check number 6800 in the amount of \$28,000 made payable to "Patient Care Solutions" and bearing forged and false signatures into his Chase account number 789051XXX.

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

**COUNTS 2 THROUGH 7**

A. Sections A through E of Count 1 of this Indictment are realleged and incorporated by reference.

B. From on or about July 1, 2008, until on or about October 6, 2008, in the Eastern District of Louisiana and elsewhere, defendants, **MELANIE NEWMAN** and **MICHAEL ANTHONY GOODLOE, JR.**, knowingly and willfully executed a scheme and artifice to defraud a health care benefit program, to-wit: the Medical Center of Louisiana Foundation, and to obtain, by means of materially false and fraudulent pretenses, representations and promises, money owned by and under the custody and control of the MCLF in connection with the delivery of and payment for health care benefits and services.

C. In the instances below, each being a separate and additional Count of this Indictment, **NEWMAN** falsely created and provided to **GOODLOE** a false and fraudulent check drawn on the account of the MCLF which falsely purported to pay for services **GOODLOE** performed on behalf of the health care benefit plan:

Count	Check Number	Date	Check Amount	Payee
2	6749	08/11/08	\$ 1,875.00	Mike Goodloe
3	6763	08/27/08	\$ 2,250.00	Mike Goodloe
4	6792	10/01/08	\$ 2,250.00	Mike Goodloe
5	6768	08/28/08	\$ 14,800.00	Patient Care Solutions
6	6776	09/12/08	\$ 14,800.00	Patient Care Solutions
7	6800	10/06/08	\$ 28,000.00	Patient Care Solutions

All in violation of Title 18, United States Code, Sections 1347 and 2.

**COUNTS 8 THROUGH 34**

On or about the below listed dates, in the Eastern District of Louisiana and elsewhere, the named defendant(s) did knowingly possess and utter forged securities of Medical Center of

Louisiana Foundation, to-wit: checks, with intent to deceive the below listed organizations and persons, each bearing a falsely made and forged endorsement of a fictitious payee, knowing the same to be falsely made and forged:

Count	Defendant(s) Charged	Check No.	Date	Amount	Organization Deceived
8	NEWMAN	6764	08/27/08	\$ 4,655.62	ACS
9	NEWMAN	6759	08/18/08	\$ 17,112.52	AES
10	NEWMAN	6765	08/28/08	\$ 35.00	AICPA
11	NEWMAN/GOODLOE	6755	08/01/08	\$ 7,000.00	Alexander Mansion
12	NEWMAN	6720	07/14/08	\$ 494.25	Beau Coup
13	NEWMAN/GOODLOE	6783	09/19/08	\$ 18,000.00	Bryan Shaw
14	NEWMAN/GOODLOE	6767	08/28/08	\$ 738.59	Green Mountain
15	NEWMAN/GOODLOE	6769	09/09/08	\$ 22,500.00	HSBC
16	NEWMAN	6729	07/16/08	\$ 216.92	J. Jill
17	NEWMAN	6740	07/28/08	\$ 2,100.38	J. Jill
18	NEWMAN	6784	09/28/08	\$ 1,625.95	J. Jill
19	NEWMAN/GOODLOE	6766	08/28/08	\$ 4,500.00	J. Roberts Photography
20	NEWMAN	6762	08/25/08	\$ 9,500.00	Loyola
21	NEWMAN/GOODLOE	6749	08/11/08	\$ 1,875.00	MCLF
22	NEWMAN/GOODLOE	6763	08/27/08	\$ 2,250.00	MCLF
23	NEWMAN/GOODLOE	6792	10/01/08	\$ 2,250.00	MCLF
24	NEWMAN	6717	07/01/08	\$ 735.23	NCO Financial Systems
25	NEWMAN/GOODLOE	6724	07/15/08	\$ 408.54	Office Depot
26	NEWMAN/GOODLOE	6745	08/06/08	\$ 8,978.89	Office Depot
27	NEWMAN/GOODLOE	6777	09/18/08	\$ 8,228.70	Office Depot
28	NEWMAN/GOODLOE	6768	08/28/08	\$ 14,800.00	MCLF
29	NEWMAN/GOODLOE	6776	09/12/08	\$ 14,800.00	MCLF
30	NEWMAN/GOODLOE	6800	10/06/08	\$ 28,000.00	MCLF

Count	Defendant(s) Charged	Check No.	Date	Amount	Organization Deceived
31	<b>NEWMAN</b>	6775	09/12/08	\$ 10,791.39	Sallie Mae
32	<b>NEWMAN</b>	6780	09/17/08	\$ 11,302.75	Sallie Mae
33	<b>NEWMAN</b>	6789	10/03/08	\$ 23,661.28	Sallie Mae
34	<b>NEWMAN</b>	6732	07/28/08	\$ 3,600.00	UCB

All in violation of Title 18, United States Code, Sections 513(a) and 2.

### **ASSET FORFEITURE**

The allegations contained in Counts 1 through 7 are hereby realleged and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.

- A. As a result of the offenses alleged in Counts 1 through 7, the defendants, **MELANIE NEWMAN** and **MICHAEL ANTHONY GOODLOE, JR.** shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(7), any and all property, real and personal, that constitutes or is derived directly or indirectly, from gross proceeds traceable to the commission of the offenses as a result of the violations of Title 18, United States Code, Section 1347, which are Federal Health Care offenses within the meaning of Title 18, United States Code, Section 24, including but not limited to:
- \$220,603.65 in United States Currency and all interest and proceeds traceable thereto, in that such sum in aggregate represents the amount of proceeds obtained as a result of the aforestated offenses or is traceable to such property.
- B. If any of the above-described forfeited property, as a result of any act or omission of the defendant,
1. cannot be located upon the exercise of due diligence;
  2. has been transferred, sold to, or deposited with, a third person;
  3. has been placed beyond the jurisdiction of the Court;


4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

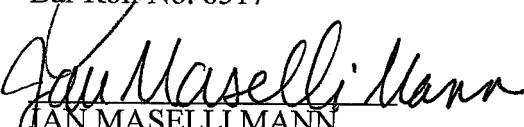
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property;

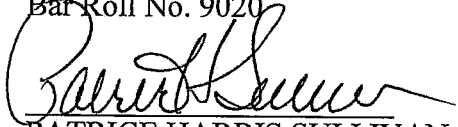
All in violation of Title 18, United States Code, Section 982(a).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
JIM LETTEN  
UNITED STATES ATTORNEY  
Bar Roll No. 8517

  
\_\_\_\_\_  
JAN MASELLI MANN  
Assistant United States Attorney  
Chief, Criminal Division  
Bar Roll No. 9020

  
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PATRICE HARRIS SULLIVAN  
Assistant United States Attorney  
Bar Roll No. 14987

New Orleans, Louisiana  
August 12, 2010