

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO: 09-_____
v.	:	DATE FILED: December 10, 2009
R&V MEDICAL SUPPLIES, LLC,	:	VIOLATIONS:
ROBERT SAUL,	:	18 U.S.C. § 371 (conspiracy – 1
SHEILA SAUL,	:	count)
CAROL MASON,	:	18 U.S.C. § 1347 (health care fraud –
LISA BURNETT	:	48 counts)
	:	18 U.S.C. § 1341 (mail fraud – 6
	:	counts)
	:	42 U.S.C. § 1320a-7b(b)(2)(A)
	:	(paying kickbacks for Medicare
	:	referrals - 47 counts)
	:	42 U.S.C. § 1320a-7b(b)(1)(A)
	:	(receiving kickbacks for Medicare
	:	referrals - 38 counts)
	:	18 U.S.C. § 1512(b)(1) (obstruction
	:	of justice - 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

(Conspiracy)

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

BACKGROUND

1. Defendant R&V MEDICAL SUPPLIES, LLC (“R&V”), a New Jersey limited liability corporation located at 1420 Walnut Street, Suite 1107, Philadelphia, Pennsylvania, was a medical supply company that provided durable medical equipment (“DME”) to beneficiaries of Medicare and other health insurance programs, such as

Independence Blue Cross (“IBC”). R&V billed Medicare and other health insurance companies, such as IBC, for this DME.

2. Defendant ROBERT SAUL was co-owner and director of operations at defendant R&V. Defendant SHEILA SAUL, who is ROBERT SAUL’S wife, was co-owner of R&V and, when working at R&V, used the title of clinical care coordinator and office manager. V.S, ROBERT SAUL’S brother, was co-owner of R&V. R&V also employed various support staff, including office workers, delivery drivers and an outside sales representative.

3. From approximately June 2002 through May 2009, defendant CAROL MASON was an employee of a Philadelphia based non-profit organization that provided social services to senior citizens and persons with disabilities. While employed there, MASON had access to confidential information regarding the organization’s clients and consumers, including names, dates of birth, addresses, social security numbers, and physician and health insurance information.

4. From approximately February 2006 through May 2009, defendant LISA BURNETT was an employee of a Philadelphia based non-profit organization that provided social services to senior citizens and persons with disabilities. While employed there, BURNETT had access to confidential information regarding the organization’s clients and consumers, including names, dates of birth, addresses, social security numbers, and physician and health insurance information.

5. Susan Landolf, charged separately, was an employee of defendant R&V from approximately April 2008 until approximately January 2009. Prior to working for R&V, Landolf worked at a medical clinic in Philadelphia, Pennsylvania and had access to patients of

the medical clinic as well as to private patient information, including patient names, dates of birth, addresses, social security numbers, and health insurance information.

6. Debra Stallings, charged separately, was an employee of a medical practice in Philadelphia, Pennsylvania from approximately April 1998 until approximately June 2008. While employed by this medical practice, Stallings had access to confidential patient information, including patient names, dates of birth, addresses, social security numbers, and health insurance information.

7. Medicare was a “health care benefit program” as defined by Title 18, United States Code, Section 24(b), and was a “Federal health care program” as defined by Title 42, United States Code, Section 1320a-7b(f).

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

9. DME was equipment that was primarily and customarily used to serve a medical purpose, could withstand repetitive use, and was appropriate for use in the home. DME included power wheelchairs, power scooters, thermal gloves, diabetic shoes and diabetic supplies, knee braces, wrist braces, and back braces, heating pads and various other types of equipment.

10. In order for a DME supplier, such as defendant R&V, to be reimbursed by Medicare, IBC, and other health care benefit programs for the cost of DME provided to a beneficiary, a physician must have determined and certified in writing that the DME was medically necessary for the particular patient. The physician’s authorization could be documented, among other ways, on traditional prescription pads, physician orders, and in letters

and certificates of medical necessity. The treating physician must have signed and dated the physician order and the DME supplier was required to have an order from the treating physician on file before dispensing DME to the beneficiary. Other documentation signed by a physician was also required. For example, Medicare required that a detailed description of the DME be included with the order. The product description was required to be signed and dated by the treating physician. In the case of power wheel chairs, effective October 2006, Medicare also required that a physician document that a face-to-face examination of the patient was conducted to establish medical necessity. Documentation of the face-to-face examination was required to be signed and dated by the physician and was required to be received by the DME supplier no more than 45 days after the face-to-face examination. As with all DME, a power wheelchair could not be dispensed until the supplier had all of the supporting documentation from the physician.

11. Defendant R&V submitted claims for reimbursement for DME to health care benefit programs, such as Medicare and IBC, through a billing company, Billing Management Services. R&V submitted its claims to Billing Management Services electronically which, in turn, forwarded those claims to the relevant health care benefit programs, resulting in payments to R&V that were primarily received through electronic funds transfers.

12. In addition, some health care benefit programs, such as IBC, required defendant R&V to pre-certify DME claims. R&V preliminarily submitted claims to IBC either electronically or by telephone. If IBC preliminarily approved the claim, it mailed a letter containing an authorization number notifying R&V. R&V was then authorized to submit the claim for payment. Without the pre-authorization, IBC would not pay the claim.

THE CONSPIRACY

13. From in or about March 2007, the exact date being unknown, and continuing up to and including the date of this indictment, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**R&V MEDICAL SUPPLIES, LLC,
ROBERT SAUL and
SHEILA SAUL**

conspired and agreed, together and with others known and unknown to the Grand Jury to commit an offense against the United States, that is, to:

a. knowingly and willfully execute a scheme and artifice to defraud health care benefit programs, that is, Medicare and IBC, and to obtain money and property owned by and under the custody and control of those health care benefit programs, by means of false and fraudulent pretenses, representations and promises, 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;

b. devise a scheme to defraud health care benefit programs, including Medicare and IBC, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and to use the United States mails to further the scheme to defraud, in violation of Title 18, United States Code, Section 1341; and

c. knowingly and willfully offer, pay, and cause to be offered and paid remuneration, that is, kickbacks and bribes, to induce the referral of Medicare beneficiaries to furnish or arrange to furnish any item or service for which payment may be made in whole or in

part under a Federal health care program, in violation of Title 42, United States Code, Section 1320a-7b(b)(2)(A).

MANNER AND MEANS

It was part of the conspiracy that:

14. To develop business, defendants R&V, ROBERT SAUL and SHEILA SAUL paid kickbacks to various persons to provide referrals to R&V for the provision of DME to health care benefit program beneficiaries, including Medicare beneficiaries. These referral sources worked in physician offices or social service or health care agencies and had access to confidential beneficiary information such as names, dates of birth, social security numbers, and health care insurance providers.

15. Defendants R&V, ROBERT SAUL and SHEILA SAUL paid kickbacks to these individuals in checks drawn on the R&V bank account, the SAULS' personal bank account, or in cash. The amounts paid were based on the amounts and types of DME ordered for each particular beneficiary, with power wheel chairs garnering the highest kickback payments. Usually, the referral fees were not paid until R&V received reimbursement from the applicable health care benefit program for the DME that was ordered as a result of the referral.

16. Beneficiary information obtained by defendant R&V through these kickback payments was verified by defendants ROBERT SAUL, SHEILA SAUL, or an R&V employee to ensure that the beneficiary was covered by a health care benefit program and to determine the scope of available coverage. Based on the available coverage, defendants ROBERT SAUL or SHEILA SAUL determined the type of DME to order for each beneficiary.

17. In addition to developing business through the payment of kickbacks to outside referral sources, defendants ROBERT SAUL and SHEILA SAUL reviewed R&V's files and ordered additional DME for health care benefit program beneficiaries whom R&V had previously supplied. The additional DME was ordered without regard to medical necessity and was based solely on the beneficiaries' available insurance coverage.

18. At the request of defendants R&V, ROBERT SAUL and SHEILA SAUL, employees of R&V drew up the necessary physician approval paperwork, such as physician orders, product descriptions, letters of medical necessity, and face-to-face examination pages, based on the type of DME to be ordered for each beneficiary and the beneficiary's particular health care benefit program.

19. On hundreds of occasions beginning in or about March, 2007, defendant ROBERT SAUL forged, or caused others to forge, physician signatures on the supporting physician approval documents.

20. Defendants R&V, ROBERT SAUL and SHEILA SAUL submitted, and caused to be submitted, fraudulent claims for reimbursement for DME to health care benefit programs, including Medicare and IBC that, among other things, were supported by false and fraudulent representations that physicians had ordered and approved the DME.

21. Between approximately March 2007 and December 2008, defendant R&V received more than \$1.2 million in fraudulent reimbursement payments and deposited or transferred these fraud proceeds into, between, and among the bank and securities accounts listed in the attached Notice of Forfeiture.

22. Defendant ROBERT SAUL employed various tactics to attempt to cover up and conceal the fraudulent claims, including, among others, the following:

a. Defendant ROBERT SAUL attempted to confuse beneficiaries as to the origin of the DME ordered on their behalf by falsely telling them, among other things, that the City of Philadelphia was giving out free medical supplies that they were qualified to receive, or that their physicians had approved them for DME at no cost to the patient;

b. Defendant ROBERT SAUL instructed referral sources at physicians' offices to try to intercept phone calls from the patients whom they had referred in order to prevent them from getting through to the physician and further instructed these referral sources to assure the patients that they were authorized to receive the equipment, which was being provided at no cost to the patient;

c. Defendant ROBERT SAUL conducted a review of R&V's files in an attempt to remove and replace forged physician approval documents after the relevant claims had already been submitted and reimbursed; and

d. Defendant ROBERT SAUL instructed defendant R&V's employees to lie to federal agents if questioned about the illegal kickbacks and forgeries.

OVERT ACTS

In furtherance of the conspiracy, defendants R&V MEDICAL SUPPLIES, LLC, ROBERT SAUL and SHEILA SAUL, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

23. From in or about August 2007 to in or about January 2008, defendants R&V, ROBERT SAUL and SHEILA SAUL paid defendant LISA BURNETT approximately

\$2,075 in kickbacks to refer Medicare beneficiaries to R&V for the provision of DME as follows:

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Jo. F.	\$100	R&V Check #1248	8/31/2007	Power Wheelchair	\$3,114.16
Al. J.	\$100	R&V Check #1279	9/20/2007	Power Wheelchair	\$3,218.96
Ed. C.	\$100	R&V Check #1304	10/9/2007	Power Wheelchair	\$3,218.96
Id. M.	\$100	R&V Check #1339	10/29/2007	Power Wheelchair	\$3,218.96
An. L. R.	\$200	R&V Check #1361, 1467	11/9/2007 2/12/2008	Power Wheelchair	\$3,218.96
Er. S.	\$100	R&V Check #1361	11/9/2007	Power Wheelchair	\$3,218.96
Pe. B.	\$100	R&V Check #1354	11/15/2007	Power Wheelchair	\$3,218.96
Ro. C.	\$100	R&V Check #1354	11/15/2007	Power Wheelchair	\$3,218.96
Ha. M.	\$100	R&V Check #1354	11/15/2007	Power Wheelchair	\$3,218.96
He. G.	\$100	R&V Check #1354	11/15/2007	Power Wheelchair	\$3,218.96
Pe. M.	\$100	R&V Check #1354	11/15/2007	Power Wheelchair	\$3,218.96
Pa. K.	\$100	R&V Check #1379	11/29/2007	Power Wheelchair	\$3,218.96
Aa. B.	\$100	R&V Check #1379	11/29/2007	Power Wheelchair	\$3,218.96

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Da. P.	\$100	R&V Check #1379	11/29/2007	Power Wheelchair	\$3,218.96
Lo. G.	\$100	R&V Check #1379	11/29/2007	Power Wheelchair	\$3,114.16
Ea. G.	\$100	R&V Check #1384	11/29/2007	Power Wheelchair	\$3,218.96
Do. S.	\$100	R&V Check #1384	11/29/2007	Power Wheelchair	\$3,218.96
He. R.	\$100	R&V Check #1393	12/10/2007	Power Wheelchair	\$3,218.96
Al. S.	\$75	R&V Check #1435	1/16/2008	Power Operated Vehicle or "Scooter"	\$1,034.22
Vi. F.	\$100	R&V Check #1452	1/31/2008	Power Wheelchair	\$3,218.96

24. From in or about September 2007 to in or about May 2008, defendants R&V, ROBERT SAUL and SHEILA SAUL paid Susan Landolf approximately \$1,097 in kickbacks to refer Medicare beneficiaries to R&V for the provision of DME as follows:

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Jo. T.	\$175	R&V Check #1267	9/18/2007	Power Wheelchair, Hosp. Bed, Gel Mattress	\$4,065.30
Te. A.	\$63	R&V Check #1362	11/9/2007	Power Wheelchair	\$3,218.96

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Sy. B.	\$63	R&V Check #1362	11/9/2007	Power Wheelchair	\$2,813.04
Eu. S.	\$63	R&V Check #1362	11/9/2007	Power Wheelchair	\$3,218.96
Jo. M.	\$63	R&V Check #1362	11/9/2007	Power Wheelchair	\$2,813.04
Ro. J.	\$75	R&V Check #1358	11/19/2007	Power Operated Vehicle or "Scooter"	\$1,034.22
Ed. T.	\$100	R&V Check #1385	11/29/2007	Power Wheelchair	\$2,813.04
Ma. T.	\$75	R&V Check #1358	11/29/2007	Power Operated Vehicle or "Scooter"	\$1,034.22
Lo. B.	\$100	R&V Check #1398	12/12/2007	Power Wheelchair	\$3,218.96
Ra. C.	\$100	R&V Check #1611	12/12/2007	Power Wheelchair	\$2,566.42
Li. E.P.	\$100	Cash	1/4/2008	Power Wheelchair	\$3,218.96
Lo. W.	\$100	R&V Check #1541	4/3/2008	Power Wheelchair	\$3,218.96
Wi. K.	\$20	R&V Check #1611	5/6/2008	Walker	\$120.23

25. From in or about January 2008 to in or about November 2008, defendants R&V, ROBERT SAUL and SHEILA SAUL paid defendant CAROL MASON approximately

\$14,900 in kickbacks to refer Medicare beneficiaries to R&V for the provision of DME as follows:

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Ma. W.	\$100	Cash	1/25/2008	Power Wheelchair	\$3,218.96
Ro. D.	\$100	Cash	1/25/2008	Power Wheelchair	\$3,218.96
Ro. M.	\$100	Cash	1/25/2008	Power Wheelchair	\$3,218.96
An. W.	\$100	Cash	1/25/2008	Power Wheelchair	\$3,218.96
Ar. W.	\$100	Cash	1/25/2008	Power Wheelchair	\$3,218.96
Al. W.	\$100	R&V Check #1492	2/19/2008	Power Wheelchair	\$4,178.62
Ja. D.	\$100	R&V Check #1492	2/19/2008	Power Wheelchair	\$3,218.96
Be. S.	\$100	R&V Check #1492	2/19/2008	Power Wheelchair	\$3,218.96
Ma. R.	\$100	R&V Check #1492	2/19/2008	Power Wheelchair	\$3,110.96
El. F.	\$100	R&V Check #1492	2/19/2008	Power Wheelchair	\$3,110.96
Ru. D.	\$100	R&V Check #1492	2/19/2008	Power Wheelchair	\$3,218.96
Ma. S.	\$100	R&V Check #1492	2/19/2008	Power Wheelchair	\$3,560.43
Ha. R.	\$100	R&V Check #1495	2/25/2008	Power Wheelchair	\$1,699.35

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
El. W.	\$100	R&V Check #1495	2/25/2008	Power Wheelchair	\$86.34
Al. B.	\$100	R&V Check #1495	2/25/2008	Power Wheelchair	\$928.48
Al. W.B.	\$100	R&V Check #1495	2/25/2008	Power Wheelchair	\$3,218.96
Jo. C.	\$100	R&V Check #1516	3/7/2008	Power Wheelchair	\$0
Je. M.	\$200	R&V Check #1516, 1530	3/7/2008, 3/12/2008	Power Wheelchair	\$3,218.96
Ro. G.	\$100	R&V Check #1516	3/7/2008	Power Wheelchair	\$3,114.16
Mi. G.	\$100	R&V Check #1516	3/7/2008	Power Wheelchair	\$3,161.91
Ar. W.	\$100	R&V Check #1516	3/7/2008	Power Wheelchair	\$3,218.96
Ir. Z.	\$100	R&V Check #1516	3/7/2008	Power Wheelchair	\$3,218.96
Co. P.	\$100	R&V Check #1530	3/12/2008	Power Wheelchair	\$0
Do. B.	\$100	R&V Check #1530	3/12/2008	Power Wheelchair	\$3,218.96
Ma. F.	\$100	R&V Check #1530	3/12/2008	Power Wheelchair	\$3,110.96
Do. H.	\$100	R&V Check #1530	3/12/2008	Power Wheelchair	\$3,218.96
An. S.	\$100	R&V Check #1530	3/12/2008	Power Wheelchair	\$3,218.96
Ed. T.	\$100	R&V Check #1530	3/12/2008	Power Wheelchair	\$3,218.96

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Do. W.	\$100	R&V Check #1530	3/12/2008	Power Wheelchair	\$2,705.04
Be. K.	\$100	R&V Check #1589	4/21/2008	Power Wheelchair	\$3,218.96
Br. P.	\$100	R&V Check #1589	4/21/2008	Power Wheelchair	\$3,218.96
Be. J.	\$100	R&V Check #1589	4/21/2008	Power Wheelchair	\$3,187.52
Fr. A.	\$100	R&V Check #1597	4/30/2008	Power Wheelchair	\$3,198.00
Ma. G.	\$100	R&V Check #1597	4/30/2008	Power Wheelchair	\$3,198.00
Ro. M.	\$100	R&V Check #1597	4/30/2008	Power Wheelchair	\$3,198.00
Sa. R.	\$100	R&V Check #1597	4/30/2008	Power Wheelchair	\$2,470.24
Al. T.	\$100	R&V Check #1597	4/30/2008	Power Wheelchair	\$3,198.00
Ch. B.	\$100	R&V Check #1613	5/6/2008	Power Wheelchair	\$2,470.24
Fr. L.	\$100	R&V Check #1613	5/6/2008	Power Wheelchair	\$2,470.24
Ab. S.	\$100	R&V Check #1613	5/6/2008	Power Wheelchair	\$3,090.00
Is. S.	\$100	R&V Check #1627	5/16/2008	Power Wheelchair	\$2,470.24
Eu. B.	\$100	R&V Check #1627	5/16/2008	Power Wheelchair	\$2,362.24
An. A.	\$100	R&V Check #1627	5/16/2008	Power Wheelchair	\$4,023.70

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
El. H.	\$100	R&V Check #1653	6/12/2008	Power Wheelchair	\$2,470.24
Ir. C.	\$100	R&V Check #1653	6/12/2008	Power Wheelchair	\$2,470.24
Ed. L.	\$100	R&V Check #1653	6/12/2008	Power Wheelchair	\$3,198.00
Ja. B.	\$100	R&V Check #1653	6/12/2008	Power Wheelchair	\$2,413.19
Cl. S.	\$100	R&V Check #1653	6/12/2008	Power Wheelchair	\$2,470.24
Ru. I.	\$100	R&V Check #1681	6/27/2008	Power Wheelchair	\$2,470.24
Co. H.	\$100	R&V Check #1681	6/27/2008	Power Wheelchair	\$2,470.24
Ca. S.	\$100	R&V Check #1681	6/27/2008	Power Wheelchair	\$3,198.00
Sh. N.	\$100	R&V Check #1710	7/10/2008	Power Wheelchair	\$2,413.19
Ki. R.	\$100	R&V Check #1710	7/10/2008	Power Wheelchair	\$2,470.24
Le. D.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$3,198.00
Be. F.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$2,470.24
An. G.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$3,198.00
El. S.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$2,470.24
Ru. T.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$3,198.00

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Ma. A.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$2,470.24
El. W.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$2,470.24
Et. N.	\$100	R&V Check #1723	7/17/2008	Power Wheelchair	\$2,470.24
Ro. H.	\$100	R&V Check #1724	7/31/2008	Power Wheelchair	\$2,470.24
Ja. H.	\$100	R&V Check #1724	7/31/2008	Power Wheelchair	\$3,198.00
Ma. C.	\$100	R&V Check #1724	7/31/2008	Power Wheelchair	\$2,470.24
He. P.	\$100	R&V Check #1724	7/31/2008	Power Wheelchair	\$3,198.00
Id. W.	\$100	R&V Check #1752	8/13/2008	Power Wheelchair	\$2,470.24
Aa. W.	\$100	R&V Check #1752	8/13/2008	Power Wheelchair	\$3,198.00
Lo. C.	\$100	R&V Check #1752	8/13/2008	Power Wheelchair	\$2,470.24
Ca. H.	\$100	R&V Check #1752	8/13/2008	Power Wheelchair	\$2,362.24
Do. M.-P.	\$100	R&V Check #1768	8/20/2008	Power Wheelchair	\$2,362.24
Id. J.	\$100	R&V Check #1768	8/20/2008	Power Wheelchair	\$2,362.24
Fl. P.	\$100	R&V Check #1768	8/20/2008	Power Wheelchair	\$3,087.80
Ba. K.	\$100	R&V Check #1768	8/20/2008	Power Wheelchair	\$3,198.00

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
He. P.	\$100	R&V Check #1768	8/20/2008	Power Wheelchair	\$2,470.24
El. S.	\$100	R&V Check #1768	8/20/2008	Power Wheelchair	\$3,198.00
Th. M.	\$100	R&V Check #1778	8/27/2008	Power Wheelchair	\$2,470.24
St. B.	\$100	R&V Check #1778	8/27/2008	Power Wheelchair	\$2,470.24
Ed. M.	\$100	R&V Check #1778	8/27/2008	Power Wheelchair	\$2,470.24
Jo. C.	\$100	R&V Check #1778	8/27/2008	Power Wheelchair	\$2,470.24
Et. D.	\$100	R&V Check #1795	9/5/2008	Power Wheelchair	\$2,470.24
Ra. F.	\$100	R&V Check #1795	9/5/2008	Power Wheelchair	\$3,198.00
Jo. R.	\$100	R&V Check #1795	9/5/2008	Power Wheelchair	\$3,198.00
Do. W.	\$100	R&V Check #1795	9/5/2008	Power Wheelchair	\$3,198.00
Ad. C.	\$100	Cash	9/12/2008	Power Wheelchair	\$3,198.00
Al. E.	\$100	Cash	9/12/2008	Power Wheelchair	\$2,362.24
Mi. E.	\$100	Cash	9/12/2008	Power Wheelchair	\$3,198.00
Wi. S.	\$100	Cash	9/12/2008	Power Wheelchair	\$3,198.00
Fr. J.	\$100	R&V Check #1798	9/14/2008	Power Wheelchair	\$3,198.00

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Re. H.	\$100	R&V Check #1829	9/17/2008	Power Wheelchair	\$2,470.24
Re. R.	\$100	R&V Check #1829	9/17/2008	Power Wheelchair	\$2,470.24
Ma. S.	\$100	R&V Check #1829	9/17/2008	Power Wheelchair	\$2,470.24
Ma. G.	\$100	R&V Check #1829	9/17/2008	Power Wheelchair	\$0
Do. A.-S.	\$100	R&V Check #1829	9/17/2008	Power Wheelchair	\$2,470.24
Mi. I.	\$100	R&V Check #1840	9/26/2008	Power Wheelchair	\$0
Fl. B.	\$100	R&V Check #1840	9/26/2008	Power Wheelchair	\$3,198.00
Ir. C.	\$100	R&V Check #1840	9/26/2008	Power Wheelchair	\$3,161.06
Do. H.	\$100	R&V Check #1840	9/26/2008	Power Wheelchair	\$2,470.24
Go. R.	\$100	R&V Check #1840	9/26/2008	Power Wheelchair	\$2,470.24
Ge. W.	\$100	R&V Check #1840	9/26/2008	Power Wheelchair	\$2,470.24
Ca. C.	\$100	R&V Check #1840	9/26/2008	Power Wheelchair	\$2,470.24
Wi. A.	\$100	Robert Saul and Sheila Saul Personal Check #670	10/3/2008	Power Wheelchair	\$3,198.00

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Ev. B.	\$100	Robert Saul and Sheila Saul Personal Check #670	10/3/2008	Power Wheelchair	\$3,198.00
Ha. J.	\$100	Robert Saul and Sheila Saul Personal Check #670	10/3/2008	Power Wheelchair	\$3,198.00
El. S.	\$100	Robert Saul and Sheila Saul Personal Check #670	10/3/2008	Power Wheelchair	\$2,470.24
Ma. S.	\$100	Robert Saul and Sheila Saul Personal Check #670	10/3/2008	Power Wheelchair	\$2,470.24
Ja. W.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$3,198.00
Jo. W.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$3,198.00
Ma. W.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$2,470.24
An. W.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$2,470.24
Jo. W.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$2,470.24

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Ge. A.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$2,470.24
Ja. B.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$3,198.00
Go. D.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$3,198.00
Al. F.	\$100	R&V Check #1842	10/9/2008	Power Wheelchair	\$3,198.00
No. H.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Ma. H.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Na. R.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$0
Th. R.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$3,198.00
Al. H.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Ru. S.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$3,198.00
Ke. B.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$3,198.00
El. C.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$3,198.00
Ma. C.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Ge. D.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Ma. H.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Cy. J.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Lo. M.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Ph. M.	\$100	R&V Check #1861	10/14/2008	Power Wheelchair	\$2,470.24
Et. Y.	\$100	R&V Check #1870	10/17/2008	Power Wheelchair	\$3,218.96
De. B.	\$100	R&V Check #1870	10/17/2008	Power Wheelchair	\$3,218.96
He. C.	\$100	R&V Check #1870	10/17/2008	Power Wheelchair	\$3,218.96
Gi. F.	\$100	R&V Check #1870	10/17/2008	Power Wheelchair	\$3,218.96
Ad. J.	\$100	R&V Check #1870	10/17/2008	Power Wheelchair	\$3,218.96
Ba. J.	\$100	R&V Check #1870	10/17/2008	Power Wheelchair	\$3,218.96
Sh. K.	\$100	R&V Check #1870	10/17/2008	Power Wheelchair	\$3,218.96
Be. L.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Ma. M.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Ma. M.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Mu. M.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Pe. M.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96

Medicare Beneficiary Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment	Equipment	Amount Paid by Medicare on Claim
Do. P.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Es. S.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Ma. S.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Mi. W.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Li. L.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Ni. B.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Ea. M.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96
Yo. K.	\$100	R&V Check #1900	11/6/2008	Power Wheelchair	\$3,218.96

26. From in or about March 2007 to in or about December 2008, on hundreds of occasions, defendant ROBERT SAUL forged physician signatures on various physician approval documents for DME claims, such as physician orders, product descriptions, and face-to-face examination forms, including but not limited to the following:

Patient	Equipment	Description	Approx. Date of Claim
Sa. A.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	5/30/2008
Ma. B.	Heating Unit	Forged Physician Order	5/30/2008

Patient	Equipment	Description	Approx. Date of Claim
Ge. B.	Power Wheelchair	Forged Physician Order and Face-to-Face Examination Form	2/14/2008
Ge. B.	Heating Unit, Back Brace	Forged Physician Order and Product Description	5/28/2008
Al. B.	Heating Unit	Forged Physician Order	5/30/2008
Ch. C.	Heating Unit, Back Brace, Tens Four Lead	Forged Physician Order and Product Description	6/17/2008
Vi. H.	Heating Unit, Back Brace, Ankle Gauntlets, Arthritic Gloves	Forged Physician Order and Product Description	7/16/2008
Lo. H.	Back Brace	Forged Physician Order	12/24/2007
Lo. H.	Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	7/2/2008
Br. J.	Back Brace	Unauthorized Equipment Added to Physician Order	3/3/2008
Br. J.	Heating Unit, Knee Braces	Forged Physician Order and Product Description	4/21/2008
Br. J.	Arthritic Gloves	Forged Physician Order and Product Description	6/20/2008
Br. L.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	4/9/2008
Br. L.	Heating Unit, back Brace	Forged Physician Order and Product Description	7/14/2008
Br. L.	Arthritic Gloves, Knee Braces, Ankle Gauntlets	Forged Physician Order and Product Description	11/6/2008

Patient	Equipment	Description	Approx. Date of Claim
He. M.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	6/9/2008
Be. M.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	5/14/2008
Be. M.	Heating Unit	Forged Physician Order and Product Description	6/26/2008
Be. M.	Arthritic Gloves, Knee Braces	Forged Physician Order and Product Description	7/14/2008
Sh. R.	Wrist Braces	Forged Physician Order and Product Description	5/13/2008
Sh. R.	Knee Braces, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/24/2008
Lu. S.	Knee Braces, Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	7/28/2008
Ad. S.	Arthritic Gloves	Forged Physician Order and Product Description	4/21/2008
Ad. S.	Heating Unit, Back Brace	Forged Physician Order and Product Description	7/28/2008
Od. S.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	4/8/2008
Ma. T.	Tens Four Lead, Heating Unit, Back Brace	Forged Physician Order and Product Description	4/15/2008
Ma. T.	Arthritic Gloves	Forged Physician Order and Product Description	8/4/2008

Patient	Equipment	Description	Approx. Date of Claim
Th. H.	Arthritic Gloves	Forged Physician Order and Product Description	6/10/2008

27. From in or about April 2008 to in or about June 2008, defendant ROBERT SAUL directed Debra Stallings to forge physician signatures on physician approval documents for DME claims, such as letters of medical necessity, including but not limited to the following:

Patient	Equipment	Description	Approx. Date of Claim
An. C.	Arthritic Gloves, Ankle Gauntlets, Back Brace	Forged Letter of Medical Necessity	5/8/2008
El. M. F.	Arthritic Gloves, Knee Braces, Back Brace	Forged Letter of Medical Necessity	5/7/2008
Wi. J.	Arthritic Gloves, Knee Braces, Back Brace, Ankle Gauntlets	Forged Letter of Medical Necessity	5/8/2008
Ma. B.	Arthritic Gloves, Ankle Gauntlets, Back Brace	Forged Letter of Medical Necessity	5/9/2008
Do. M.	Arthritic Gloves	Forged Letter of Medical Necessity	5/9/2008
Al. S.	Arthritic Gloves	Forged Letter of Medical Necessity	5/28/2008
Ot. B.	Arthritic Gloves, Ankle Gauntlets	Forged Letter of Medical Necessity	5/9/2008
Th. H.	Arthritic Gloves	Forged Letter of Medical Necessity	6/10/2008

28. From in or about April 2008 to in or about December 2008, defendant ROBERT SAUL directed Susan Landolf to forge physician signatures on physician approval documents for DME claims, such as letters of medical necessity, physician orders, product descriptions, and face-to-face examination forms, including but not limited to the following:

Patient	Equipment	Description	Approx. Date of Claim
Te. A.	Heating Unit, Back Brace, Knee Brace	Forged Physician Order and Product Description	5/27/2008
Sy. B.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	6/20/2008
Ve. B.	Back Brace, Knee Brace, Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	6/10/2008
Lo. B.	Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	6/4/2008
De. B.	Heating Unit	Forged Physician Order	6/12/2008
Ra. C.	Power Wheelchair	Forged Physician Order and Product Description	4/9/2008
Li. E.P.	Heating Unit, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/24/2008
Do. H.	Knee Brace, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	10/29/2008
Ro. J.	Arthritic Gloves	Forged Physician Order and Product Description	7/7/2008
Wi. K.	Heating Unit, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/9/2008
Jo. M.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	7/18/2008

Patient	Equipment	Description	Approx. Date of Claim
Ma. T.J.	Arthritic Gloves, Knee Brace, Back Brace, Heating Unit	Forged Physician Order and Product Description	8/4/2008
Ru. B.	Back Brace	Forged Physician Order, Product Description, and Letter of Medical Necessity	7/18/2008

29. From in or about March 2007 to in or about December 2008, defendants R&V, ROBERT SAUL and SHEILA SAUL knowingly submitted, or caused to be submitted, fraudulent DME reimbursement claims to Medicare and IBC that were supported by physician approval documents, such as letters of medical necessity, physician orders, product descriptions, and face-to-face examination forms, that were forged by defendant ROBERT SAUL, Debra Stallings and Susan Landolf, including but not limited to the following:

Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
Sa. A.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	5/30/2008	\$1,297.00	\$894.32
Ma. B.	Heating Unit	Forged Physician Order	5/30/2008	\$499.00	\$337.60
Ge. B.	Power Wheelchair	Forged Physician Order and Face-to-Face Examination Form	2/14/2008	\$4,999.00	\$3,218.96
Ge. B.	Heating Unit, Back Brace	Forged Physician Order and Product Description	5/28/2008	\$1,518.00	\$1,060.95

Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
Al. B.	Heating Unit	Forged Physician Order	5/30/2008	\$499.00	\$337.60
Ch. C.	Heating Unit, Back Brace, Tens Four Lead	Forged Physician Order and Product Description	6/17/2008	\$1,467.00	\$1,072.20
Vi. H.	Heating Unit, Back Brace, Ankle Gauntlets, Arthritic Gloves	Forged Physician Order and Product Description	7/16/2008	\$2,514.00	\$1,819.62
Lo. H.	Back Brace	Forged Physician Order	12/24/2007	\$1,199	\$864.73
Lo. H.	Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	7/2/2008	\$1,297.00	\$976.00
Br. J.	Back Brace	Unauthorized Equipment Added to Physician Order	3/3/2008	\$1,019	\$700.30
Br. J.	Heating Unit, Knee Braces	Forged Physician Order and Product Description	4/21/2008	\$1,098.00	\$793.82
Br. J.	Arthritic Gloves	Forged Physician Order and Product Description	6/20/2008	\$798	\$556.72
Br. L.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	4/9/2008	\$3,999	\$2,362.24

Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
Br. L.	Heating Unit, back Brace	Forged Physician Order and Product Description	7/14/2008	\$1,518.00	\$1,060.95
Br. L.	Arthritic Gloves, Knee Braces, Ankle Gauntlets	Forged Physician Order and Product Description	11/6/2008	\$1,195.00	\$882.95
He. M.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	6/9/2008	\$3,999	\$2,470.24
Be. M.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	5/14/2008	\$4,999	\$3,198
Be. M.	Heating Unit	Forged Physician Order and Product Description	6/26/2008	\$399	\$319.20
Be. M.	Arthritic Gloves, Knee Braces	Forged Physician Order and Product Description	7/14/2008	\$1,996.00	\$1,550.83
Sh. R.	Wrist Braces	Forged Physician Order and Product Description	5/13/2008	\$98	\$78.40
Sh. R.	Knee Braces, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/24/2008	\$3,015.00	\$2,274.18
Lu. S.	Knee Braces, Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	7/28/2008	\$2,495.00	\$1,888.43

Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
Ad. S.	Arthritic Gloves	Forged Physician Order and Product Description	4/21/2008	\$399	\$278.36
Ad. S.	Heating Unit, Back Brace	Forged Physician Order and Product Description	7/28/2008	\$1,518.00	\$1,060.95
Od. S.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	4/8/2008	\$3,999	\$2,470.24
Ma. T.	Tens Four Lead, Heating Unit, Back Brace	Forged Physician Order and Product Description	4/15/2008	\$1,567.00	\$1,090.60
Ma. T.	Arthritic Gloves	Forged Physician Order and Product Description	8/4/2008	\$798	\$638.40
Te. A.	Heating Unit, Back Brace, Knee Brace	Forged Physician Order and Product Description	5/27/2008	\$2,716.00	\$1,973.38
Sy. B.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	6/20/2008	\$1,220.00	\$894.32
Ve. B.	Back Brace, Knee Brace, Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	6/10/2008	\$3,314.00	\$0
Lo. B.	Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	6/4/2008	\$1,297.00	\$894.32
De. B.	Heating Unit	Forged Physician Order	6/12/2008	\$499	\$337.60

Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
Ra. C.	Power Wheelchair	Forged Physician Order and Product Description	4/9/2008	\$3,999	\$2,470.24
Li. E.P.	Heating Unit, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/24/2008	\$2,316.00	\$1,699.35
Do. H.	Knee Brace, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	10/29/2008	\$2,615.00	\$1,942.25
Ro. J.	Arthritic Gloves	Forged Physician Order and Product Description	7/7/2008	\$798	\$638.40
Wi. K.	Heating Unit, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/9/2008	\$2,316.00	\$1,699.35
Jo. M.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	7/18/2008	\$1,297.00	\$976.00
Ma. T.J.	Arthritic Gloves, Knee Brace, Back Brace, Heating Unit	Forged Physician Order and Product Description	8/4/2008	\$3,115.00	\$2,235.54
Th. H.	Arthritic Gloves	Forged Physician Order, Product Description, and Letter of Medical Necessity	6/10/2008	\$798	\$556.72

Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
Ru. B.	Back Brace	Forged Physician Order, Product Description, and Letter of Medical Necessity	7/18/2008	\$1,019	\$506.48
An. C.	Arthritic Gloves, Ankle Gauntlets, Back Brace	Forged Letter of Medical Necessity	5/8/2008	\$2,015.00	\$997.24
El. M. F.	Arthritic Gloves, Knee Braces, Back Brace	Forged Letter of Medical Necessity	5/7/2008	\$3,015.00	\$1,551.90
Wi. J.	Arthritic Gloves, Knee Braces, Back Brace, Ankle Gauntlets	Forged Letter of Medical Necessity	5/8/2008	\$3,213.00	\$1,636.10
Ma. B.	Arthritic Gloves, Ankle Gauntlets, Back Brace	Forged Letter of Medical Necessity	5/9/2008	\$2,015.00	\$997.24
Do. M.	Arthritic Gloves	Forged Letter of Medical Necessity	5/9/2008	\$798	\$406.56
Al. S.	Arthritic Gloves	Forged Letter of Medical Necessity	5/28/2008	\$798	\$406.56
Ot. B.	Arthritic Gloves, Ankle Gauntlets	Forged Letter of Medical Necessity	5/9/2008	\$996.00	\$490.76

30. In or about October 2008, defendant ROBERT SAUL reviewed R&V's patient files for forgeries and attempted to obtain legitimate physician signatures for DME claims that had already been billed to and paid by Medicare. If successful, ROBERT SAUL destroyed, and directed R&V employees to destroy, the forged documentation originally used to support the claims.

31. After defendant ROBERT SAUL was aware that a federal criminal investigation of his activities was underway, defendant ROBERT SAUL engaged in a deliberate effort to cover up the fraudulent scheme by, among other things, attempting to persuade employees of defendant R&V to provide false information to federal law enforcement officials as follows:

a. On or about December 18, 2008, defendant ROBERT SAUL instructed defendant R&V's employees Susan Landolf, M. M., and B. B. to falsely tell federal agents that they had never witnessed defendant ROBERT SAUL signing physician signatures on physician approval documents;

b. On or about January 22, 2009, defendant ROBERT SAUL directed defendant R&V's employees Susan Landolf and M. M. to falsely tell federal agents, among other things, that another R&V employee, F. P., was responsible for obtaining physician signatures on the forged approval documents and that defendant ROBERT SAUL and other employees of defendant R&V had no knowledge that the documents had been forged; and

c. On or about February 11, 2009, defendant ROBERT SAUL pressured Susan Landolf into signing a document that falsely stated, among other things, that defendant R&V, its members, officers, directors, employees and agents had fully complied with all

appropriate laws, statutes and regulations concerning the operation of R&V and that she was not aware of any fact or circumstance which would be considered a violation of any applicable law or which would give rise to a fraudulent claim being submitted to Medicare or an insurance company.

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

COUNTS TWO THROUGH FORTY-ONE

(Health Care Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 and 14 through 31 of Count One are incorporated here.
2. On or about each of the dates listed below, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly and willfully executed a scheme and artifice to defraud Medicare, a health care benefit program, and to obtain money and property owned by and under the custody and control of that health care benefit program by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care benefits, items and services, and aided and abetted the execution of the scheme, by submitting and causing to be submitted fraudulent health care insurance claims for durable medical equipment purportedly provided to each of the individuals listed below, in the approximate amounts listed below (each claim constituting a separate count of this indictment):

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
2	Sa. A.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	5/30/2008	\$1,297.00	\$894.32

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
3	Ma. B.	Heating Unit	Forged Physician Order	5/30/2008	\$499.00	\$337.60
4	Ge. B.	Power Wheelchair	Forged Physician Order and Face-to- Face Examination Form	2/14/2008	\$4,999.00	\$3,218.96
5	Ge. B.	Heating Unit, Back Brace	Forged Physician Order and Product Description	5/28/2008	\$1,518.00	\$1,060.95
6	Al. B.	Heating Unit	Forged Physician Order	5/30/2008	\$499.00	\$337.60
7	Ch. C.	Heating Unit, Back Brace, Tens Four Lead	Forged Physician Order and Product Description	6/17/2008	\$1,467.00	\$1,072.20
8	Vi. H.	Heating Unit, Back Brace, Ankle Gauntlets, Arthritic Gloves	Forged Physician Order and Product Description	7/16/2008	\$2,514.00	\$1,819.62
9	Lo. H.	Back Brace	Forged Physician Order	12/24/2007	\$1,199	\$864.73
10	Lo. H.	Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	7/2/2008	\$1,297.00	\$976.00
11	Br. J.	Back Brace	Unauthorized Equipment Added to Physician Order	3/3/2008	\$1,019	\$700.30

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
12	Br. J.	Heating Unit, Knee Braces	Forged Physician Order and Product Description	4/21/2008	\$1,098.00	\$793.82
13	Br. J.	Arthritic Gloves	Forged Physician Order and Product Description	6/20/2008	\$798	\$556.72
14	Br. L.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	4/9/2008	\$3,999	\$2,362.24
15	Br. L.	Heating Unit, back Brace	Forged Physician Order and Product Description	7/14/2008	\$1,518.00	\$1,060.95
16	Br. L.	Arthritic Gloves, Knee Braces, Ankle Gauntlets	Forged Physician Order and Product Description	11/6/2008	\$1,195.00	\$882.95
17	He. M.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	6/9/2008	\$3,999	\$2,470.24

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
18	Be. M.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	5/14/2008	\$4,999	\$3,198
19	Be. M.	Heating Unit	Forged Physician Order and Product Description	6/26/2008	\$399	\$319.20
20	Be. M.	Arthritic Gloves, Knee Braces	Forged Physician Order and Product Description	7/14/2008	\$1,996.00	\$1,550.83
21	Sh. R.	Wrist Braces	Forged Physician Order and Product Description	5/13/2008	\$98	\$78.40
22	Sh. R.	Knee Braces, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/24/2008	\$3,015.00	\$2,274.18
23	Lu. S.	Knee Braces, Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	7/28/2008	\$2,495.00	\$1,888.43
24	Ad. S.	Arthritic Gloves	Forged Physician Order and Product Description	4/21/2008	\$399	\$278.36

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
25	Ad. S.	Heating Unit, Back Brace	Forged Physician Order and Product Description	7/28/2008	\$1,518.00	\$1,060.95
26	Od. S.	Power Wheelchair	Forged Physician Order, Product Description, and Face-to-Face Examination Form	4/8/2008	\$3,999	\$2,470.24
27	Ma. T.	Tens Four Lead, Heating Unit, Back Brace	Forged Physician Order and Product Description	4/15/2008	\$1,567.00	\$1,090.60
28	Ma. T.	Arthritic Gloves	Forged Physician Order and Product Description	8/4/2008	\$798	\$638.40
29	Te. A.	Heating Unit, Back Brace, Knee Brace	Forged Physician Order and Product Description	5/27/2008	\$2,716.00	\$1,973.38
30	Sy. B.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	6/20/2008	\$1,220.00	\$894.32
31	Ve. B.	Back Brace, Knee Brace, Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	6/10/2008	\$3,314.00	\$0

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
32	Lo. B.	Arthritic Gloves, Heating Unit	Forged Physician Order and Product Description	6/4/2008	\$1,297.00	\$894.32
33	De. B.	Heating Unit	Forged Physician Order	6/12/2008	\$499	\$337.60
34	Ra. C.	Power Wheelchair	Forged Physician Order and Product Description	4/9/2008	\$3,999	\$2,470.24
35	Li. E.P.	Heating Unit, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/24/2008	\$2,316.00	\$1,699.35
36	Do. H.	Knee Brace, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	10/29/2008	\$2,615.00	\$1,942.25
37	Ro. J.	Arthritic Gloves	Forged Physician Order and Product Description	7/7/2008	\$798	\$638.40
38	Wi. K.	Heating Unit, Back Brace, Arthritic Gloves	Forged Physician Order and Product Description	7/9/2008	\$2,316.00	\$1,699.35
39	Jo. M.	Heating Unit, Arthritic Gloves	Forged Physician Order and Product Description	7/18/2008	\$1,297.00	\$976.00

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
40	Ma. T.J.	Arthritic Gloves, Knee Brace, Back Brace, Heating Unit	Forged Physician Order and Product Description	8/4/2008	\$3,115.00	\$2,235.54
41	Th. H.	Arthritic Gloves	Forged Physician Order, Product Description, and Letter of Medical Necessity	6/10/2008	\$798	\$556.72

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

COUNTS FORTY-TWO THROUGH FORTY-NINE

(Health Care Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 and 14 through 31 of Count One are incorporated here.
2. On or about each of the dates listed below, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly and willfully executed a scheme and artifice to defraud Independence Blue Cross, a health care benefit program, and to obtain money and property owned by and under the custody and control of that health care benefit program by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care benefits, items and services, and aided and abetted the execution of the scheme, by submitting and causing to be submitted fraudulent health care insurance claims for durable medical equipment purportedly provided to each of the individuals listed below, in the approximate amounts listed below (each claim constituting a separate count of this indictment):

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
42	Ru. B.	Back Brace	Forged Physician Order, Product Description, and Letter of Medical Necessity	7/18/2008	\$1,019	\$506.48
43	An. C.	Arthritic Gloves, Ankle Gauntlets, Back Brace	Forged Letter of Medical Necessity	5/8/2008	\$2,015.00	\$997.24
44	El. M. F.	Arthritic Gloves, Knee Braces, Back Brace	Forged Letter of Medical Necessity	5/7/2008	\$3,015.00	\$1,551.90
45	Wi. J.	Arthritic Gloves, Knee Braces, Back Brace, Ankle Gauntlets	Forged Letter of Medical Necessity	5/8/2008	\$3,213.00	\$1,636.10
46	Ma. B.	Arthritic Gloves, Ankle Gauntlets, Back Brace	Forged Letter of Medical Necessity	5/9/2008	\$2,015.00	\$997.24
47	Do. M.	Arthritic Gloves	Forged Letter of Medical Necessity	5/9/2008	\$798	\$406.56
48	Al. S.	Arthritic Gloves	Forged Letter of Medical Necessity	5/28/2008	\$798	\$406.56

Count	Patient	Equipment	Description	Approx. Date of Claim	Amount Billed by R&V	Approx. Amount Paid to R&V
49	Ot. B.	Arthritic Gloves, Ankle Gauntlets	Forged Letter of Medical Necessity	5/9/2008	\$996.00	\$490.76

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

COUNTS FIFTY THROUGH FIFTY-FIVE

(Mail Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

INTRODUCTION

1. Paragraphs 1 through 12 and 14 through 31 of Count One are incorporated here.

THE SCHEME TO DEFRAUD

2. Between in or about March 2007 and the date of this indictment, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

devised and intended to devise a scheme to defraud Independence Blue Cross, and to obtain money and property from Independence Blue Cross by means of knowingly false and fraudulent pretenses, representations, and promises.

3. It was the object of the scheme described in paragraph 2 for defendants R&V MEDICAL SUPPLIES, LLC and ROBERT SAUL to submit fraudulent claims for reimbursement to Independence Blue Cross in connection with the provision of DME by R&V to patients whom IBC had insured.

Manner and Means

4. It was part of the scheme to defraud that defendants R&V MEDICAL SUPPLIES, LLC and ROBERT SAUL engaged in the manner and means described in paragraphs 14-31 of Count 1 of this indictment.

5. On or about each of the dates listed below, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**R&V MEDICAL SUPPLIES, LLC AND
ROBERT SAUL**

for the purpose of executing the scheme to defraud described above, and aiding and abetting its execution, knowingly caused to be delivered by United States mail, according to the directions thereon, letters from Independence Blue Cross addressed to R&V Medical Supplies, LLC authorizing the submission of claims, as follows (each mailing constituting a separate count of this indictment):

Count	Patient Name	Equip.	Description	Approx. Date of Mailing of Auth. Letter	Approx. Date of Claim	Amt. Billed by R&V	Approx. Amount Paid on Claim
50	Ma. B.	Arthritic Gloves	Forged Letter of Medical Necessity	5/2/2008	5/9/2008	\$798.00	\$406.56
51	Ma. B.	Back Brace	Forged Letter of Medical Necessity	5/11/2008	5/9/2008	\$1,019.00	\$506.48
52	Ot. B.	Arthritic Gloves	Forged Letter of Medical Necessity	5/6/2008	5/9/2008	\$798.00	\$406.56
53	El. M.F.	Arthritic Gloves	Forged Letter of Medical Necessity	5/6/2008	5/7/2008	\$798.00	\$406.56

Count	Patient Name	Equip.	Description	Approx. Date of Mailing of Auth. Letter	Approx. Date of Claim	Amt. Billed by R&V	Approx. Amount Paid on Claim
54	El. M.F.	Back Brace, Knee Braces	Forged Letter of Medical Necessity	5/2/2008	5/7/2008	\$2,217.00	\$1145.34
55	Ru. B.	Back Brace	Forged Letter of Medical Necessity, Physician Order, and Product Description	7/8/2008	7/18/2008	\$1,019.00	\$506.48

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS FIFTY-SIX THROUGH SIXTY-FOUR

(Anti-Kickback Statute)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 2, 5 and 7-12 of Count One are incorporated here.
2. On or about each of the dates listed below, in Philadelphia, in the Eastern

District of Pennsylvania and elsewhere, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly and willfully offered to pay and paid remuneration (including kickbacks and bribes) directly and indirectly, overtly and covertly, in cash and in kind to Susan Landolf to induce her to refer individuals to defendant R&V MEDICAL SUPPLIES, LLC to furnish or arrange to furnish any item or service for which payment may be made in whole or in part under Medicare, a Federal health care program, as follows (each payment constituting a separate count of this indictment):

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
56	Jo. T.	\$175	R&V Check #1267	9/18/2007
57	Te. A; Sy. B.; Eu. S.; Jo. M.	\$252	R&V Check #1362	11/9/2007
58	Ro. J.; Ma. T.	\$150	R&V Check #1358	11/19/2007
59	Ed. T.	\$100	R&V Check #1385	11/29/2007

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
60	Lo. B.	\$100	R&V Check #1398	12/12/2007
61	Ra. C.	\$100	R&V Check #1611	12/12/2007
62	Li. E.P.	\$100	Cash	1/4/2008
63	Lo. W.	\$100	R&V Check #1541	4/3/2008
64	Wi. K.	\$20	R&V Check #1611	5/6/2008

All in violation of Title 42, United States Code, Section 1320a-7b(b)(2)(A).

COUNTS SIXTY-FIVE THROUGH SEVENTY-FIVE

(Anti-Kickback Statute)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 2, 4 and 7-12 of Count One are incorporated here.
2. On or about each of the dates listed below, in Philadelphia, in the Eastern

District of Pennsylvania and elsewhere, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly and willfully offered to pay and paid remuneration (including kickbacks and bribes) directly and indirectly, overtly and covertly, in cash and in kind to Lisa Burnett to induce her to refer individuals to defendant R&V MEDICAL SUPPLIES, LLC to furnish and arrange to furnish any item or service for which payment may be made in whole or in part under Medicare, a Federal health care program, as follows (each payment constituting a separate count of this indictment):

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
65	Jo. F.	\$100	R&V Check #1248	8/31/2007
66	Al. J.	\$100	R&V Check #1279	9/20/2007
67	Ed. C.	\$100	R&V Check #1304	10/9/2007
68	Id. M.	\$100	R&V Check #1339	10/29/2007
69	An. L. R.; Er. S.	\$200	R&V Check #1361	11/9/2007

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
70	Pe. B.; Ro. C.; Ha. M.; He. G.; Pe. M.;	\$500	R&V Check #1354	11/15/2007
71	Pa. K.; Aa. B.; Da. P.; Lo. G.; Ea. G.; Do. S.	\$600	R&V Check #1379, #1384	11/29/2007
72	He. R.	\$100	R&V Check #1393	12/10/2007
73	Al. S.	\$75	R&V Check #1435	1/16/2008
74	Vi. F.	\$100	R&V Check #1452	1/31/2008
75	An. L. R.	\$100	R&V Check #1467	2/12/2007

All in violation of Title 42, United States Code, Section 1320a-7b(b)(2)(A).

COUNTS SEVENTY-SIX THROUGH ONE HUNDRED TWO

(Anti-Kickback Statute)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-3 and 7-12 of Count One are incorporated here.
2. On or about each of the dates listed below, in Philadelphia, in the Eastern

District of Pennsylvania and elsewhere, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly and willfully offered to pay and paid remuneration (including kickbacks and bribes) directly and indirectly, overtly and covertly, in cash and in kind to Carol Mason to induce her to refer individuals to defendant R&V MEDICAL SUPPLIES, LLC to furnish and arrange to furnish any item or service for which payment may be made in whole or in part under Medicare, a Federal health care program, as follows (each payment constituting a separate count of this indictment):

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
76	Ma. W; Ro. D.; Ro. M.; An. W.; Ar. W.	\$500	Cash	1/25/2008
77	Al. W.; Ja. D.; Be. S.; Ma. R.; El. F.; Ru. D.; Ma. S.	\$700	R&V Check #1492	2/19/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
78	Ha. R; El. W.; Al. B.; Al. W. B.	\$400	R&V Check #1495	2/25/2008
79	Jo. C.; Je. M.; Ro. G.; Mi. G.; Ar. W.; Ir. Z.	\$600	R&V Check #1516	3/7/2008
80	Co. P; Do. B.; Ma. F.; Do. H.; An. S.; Ed. T.; Do. W.; Je. M.	\$800	R&V Check #1530	3/12/2008
81	Be. K.; Br. P.; Be. J.	\$300	R&V Check #1589	4/21/2008
82	Fr. A.; Ma. G.; Ro. M.; Sa. R.; Al. T.	\$500	R&V Check #1597	4/30/2008
83	Ch. B.; Fr. L.; Ab. S.	\$300	R&V Check #1613	5/6/2008
84	Is. S.; Eu. B.; An. A.	\$300	R&V Check #1627	5/16/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
85	El. H.; Ir. C.; Ed. L.; Ja. B.; Cl. S.	\$500	R&V Check #1653	6/12/2008
86	Ru. I.; Co. H.; Ca. S.	\$300	R&V Check #1681	6/27/2008
87	Sh. N.; Ki. Ro.	\$200	R&V Check #1710	7/10/2008
88	Le. D.; Be. F.; An. G.; El. S.; Ru. T.; Ma. A.; El. W.; Et. N.	\$800	R&V Check #1723	7/17/2008
89	Ro. H.; Ja. H.; Ma. C.; He. P.	\$400	R&V Check #1724	7/31/2008
90	Id. W.; Aa. W.; Lo. C.; Ca. H.	\$400	R&V Check #1752	8/13/2008
91	Do. M.-P.; Id. J.; Fl. P.; Ba. K.; He. P.; El. S.	\$600	R&V Check #1768	8/20/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
92	Th. M.; St. B.; Ed. M.; Jo. C.	\$400	R&V Check #1778	8/27/2008
93	Et. D.; Ra. F.; Jo. R.; Do. W.	\$400	R&V Check #1795	9/5/2008
94	Ad. C.; Al. E.; Mi. E.; Wi. S.	\$400	Cash	9/12/2008
95	Fr. J.	\$100	R&V Check #1798	9/14/2008
96	Re. H.; Re. R.; Ma. S.; Ma. G.; Do. A.-S.	\$500	R&V Check #1829	9/17/2008
97	Mi. I.; Fl. B.; Ir. C.; Do. H.; Go. R.; Ge. W.; Ca. C.	\$700	R&V Check #1840	9/26/2008
98	Wi. A.; Ev. B.; Ha. J.; El. S.; Ma. S.	\$500	Robert Saul and Sheila Saul Personal Check #670	10/3/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
99	Ja. W.; Jo. W.; Ma. W.; An. W.; Jo. W.; Ge. A; Ja. B.; Go. D.; Al. F.	\$900	R&V Check #1842	10/9/2008
100	No. H.; Ma. H.; Na. R.; Th. R.; Al. H.; Ru. S.; Ke. B.; El. C.; Ma. C.; Ge. D.; Ma. H.; Cy. J.; Lo. M.; Ph. M.	\$1,400	R&V Check #1861	10/14/2008
101	Et. Y.; De. B.; He. C.; Gi. F.; Ad. J.; Ba. J.; Sh. K.	\$700	R&V Check #1870	10/17/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
102	Be. L.; Ma. M.; Ma. M.; Mu. M.; Pe. M.; Do. P.; Es. S.; Ma. S.; Mi. W.; Li. L.; Ni. B.; Ea. M.; Yo. K.	\$1,300	R&V Check #1900	11/6/2008

All in violation of Title 42, United States Code, Section 1320a-7b(b)(2)(A).

COUNTS ONE HUNDRED THREE THROUGH ONE HUNDRED THIRTEEN

(Anti-Kickback Statute)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 2, 4 and 7-12 of Count One are incorporated here.
2. On or about each of the dates listed below, in Philadelphia, in the Eastern

District of Pennsylvania and elsewhere, defendant

LISA BURNETT

knowingly and willfully solicited and received remuneration (including kickbacks and bribes) directly and indirectly, overtly and covertly, in cash and in kind in return for referring individuals to R&V Medical Supplies, LLC to furnish and arrange to furnish any item or service for which payment may be made in whole or in part under Medicare, a Federal health care program, as follows (each payment constituting a separate count of this indictment):

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
103	Jo. F.	\$100	R&V Check #1248	8/31/2007
104	Al. J.	\$100	R&V Check #1279	9/20/2007
105	Ed. C.	\$100	R&V Check #1304	10/9/2007
106	Id. M.	\$100	R&V Check #1339	10/29/2007
107	An. L. R.; Er. S.	\$200	R&V Check #1361	11/9/2007

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
108	Pe. B.; Ro. C.; Ha. M.; He. G.; Pe. M.;	\$500	R&V Check #1354	11/15/2007
109	Pa. K.; Aa. B.; Da. P.; Lo. G.; Ea. G.; Do. S.	\$600	R&V Check #1379, #1384	11/29/2007
110	He. R.	\$100	R&V Check #1393	12/10/2007
111	Al. S.	\$75	R&V Check #1435	1/16/2008
112	Vi. F.	\$100	R&V Check #1452	1/31/2008
113	An. L. R.	\$100	R&V Check #1467	2/12/2007

All in violation of Title 42, United States Code, Section 1320a-7b(b)(1)(A).

COUNTS ONE HUNDRED FOURTEEN THROUGH ONE HUNDRED FORTY

(Anti Kickback Statute)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-3 and 7-12 of Count One are incorporated here.
2. On or about each of the dates listed below, in Philadelphia, in the Eastern

District of Pennsylvania and elsewhere, defendant

CAROL MASON

knowingly and willfully solicited and received remuneration (including kickbacks and bribes) directly and indirectly, overtly and covertly, in cash and in kind in return for referring individuals to R&V Medical Supplies, LLC to furnish and arrange to furnish any item or service for which payment may be made in whole or in part under Medicare, a Federal health care program, as follows (each payment constituting a separate count of this indictment):

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
114	Ma. W; Ro. D.; Ro. M.; An. W.; Ar. W.	\$500	Cash	1/25/2008
115	Al. W.; Ja. D.; Be. S.; Ma. R.; El. F.; Ru. D.; Ma. S.	\$700	R&V Check #1492	2/19/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
116	Ha. R; El. W.; Al. B.; Al. W. B.	\$400	R&V Check #1495	2/25/2008
117	Jo. C.; Je. M.; Ro. G.; Mi. G.; Ar. W.; Ir. Z.	\$600	R&V Check #1516	3/7/2008
118	Co. P; Do. B.; Ma. F.; Do. H.; An. S.; Ed. T.; Do. W.; Je. M.	\$800	R&V Check #1530	3/12/2008
119	Be. K.; Br. P.; Be. J.	\$300	R&V Check #1589	4/21/2008
120	Fr. A.; Ma. G.; Ro. M.; Sa. R.; Al. T.	\$500	R&V Check #1597	4/30/2008
121	Ch. B.; Fr. L.; Ab. S.	\$300	R&V Check #1613	5/6/2008
122	Is. S.; Eu. B.; An. A.	\$300	R&V Check #1627	5/16/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
123	El. H.; Ir. C.; Ed. L.; Ja. B.; Cl. S.	\$500	R&V Check #1653	6/12/2008
124	Ru. I.; Co. H.; Ca. S.	\$300	R&V Check #1681	6/27/2008
125	Sh. N.; Ki. Ro.	\$200	R&V Check #1710	7/10/2008
126	Le. D.; Be. F.; An. G.; El. S.; Ru. T.; Ma. A.; El. W.; Et. N.	\$800	R&V Check #1723	7/17/2008
127	Ro. H.; Ja. H.; Ma. C.; He. P.	\$400	R&V Check #1724	7/31/2008
128	Id. W.; Aa. W.; Lo. C.; Ca. H.	\$400	R&V Check #1752	8/13/2008
129	Do. M.-P.; Id. J.; Fl. P.; Ba. K.; He. P.; El. S.	\$600	R&V Check #1768	8/20/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
130	Th. M.; St. B.; Ed. M.; Jo. C.	\$400	R&V Check #1778	8/27/2008
131	Et. D.; Ra. F.; Jo. R.; Do. W.	\$400	R&V Check #1795	9/5/2008
132	Ad. C.; Al. E.; Mi. E.; Wi. S.	\$400	Cash	9/12/2008
133	Fr. J.	\$100	R&V Check #1798	9/14/2008
134	Re. H.; Re. R.; Ma. S.; Ma. G.; Do. A.-S.	\$500	R&V Check #1829	9/17/2008
135	Mi. I.; Fl. B.; Ir. C.; Do. H.; Go. R.; Ge. W.; Ca. C.	\$700	R&V Check #1840	9/26/2008
136	Wi. A.; Ev. B.; Ha. J.; El. S.; Ma. S.	\$500	Robert Saul and Sheila Saul Personal Check #670	10/3/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
137	Ja. W.; Jo. W.; Ma. W.; An. W.; Jo. W.; Ge. A; Ja. B.; Go. D.; Al. F.	\$900	R&V Check #1842	10/9/2008
138	No. H.; Ma. H.; Na. R.; Th. R.; Al. H.; Ru. S.; Ke. B.; El. C.; Ma. C.; Ge. D.; Ma. H.; Cy. J.; Lo. M.; Ph. M.	\$1,400	R&V Check #1861	10/14/2008
139	Et. Y.; De. B.; He. C.; Gi. F.; Ad. J.; Ba. J.; Sh. K.	\$700	R&V Check #1870	10/17/2008

Count	Medicare Beneficiaries Referred	Approx. Kickback Amount	Payment Method	Approx. Date of Payment
140	Be. L.; Ma. M.; Ma. M.; Mu. M.; Pe. M.; Do. P.; Es. S.; Ma. S.; Mi. W.; Li. L.; Ni. B.; Ea. M.; Yo. K.	\$1,300	R&V Check #1900	11/6/2008

All in violation of Title 42, United States Code, Section 1320a-7b(b)(1)(A).

COUNT ONE HUNDRED FORTY-ONE

(Obstruction of Justice)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-12 and 14-31 of Count One are incorporated here.
2. On or about December 17, 2008, federal law enforcement agents involved in the investigation of the fraudulent activities described in Counts 1-140 of this indictment executed search warrants at the business offices of defendant R&V MEDICAL SUPPLIES, LLC and at the residence of defendants ROBERT SAUL and SHEILA SAUL.
3. After execution of the search warrants and discovery by defendant ROBERT SAUL that a federal criminal investigation of his activities was underway, defendant ROBERT SAUL engaged in a deliberate effort to persuade employees of defendant R&V MEDICAL SUPPLIES, LLC and other persons to provide false information to federal law enforcement officials in order to attempt to thwart the investigation.
4. On or about December 18, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly attempted to corruptly persuade Susan Landolf, M.M., and B.B. to falsely tell federal agents that they had never witnessed defendant ROBERT SAUL signing physician signatures on physician approval documents, with the intent to influence the testimony of Susan Landolf, M.M., and B.B. in a federal grand jury proceeding.

In violation of Title 18, United States Code, Sections 1512(b)(1).

COUNT ONE HUNDRED FORTY-TWO

(Obstruction of Justice)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-12 and 14-31 of Count One and Paragraphs 2-3 of Count One Hundred Forty-One are incorporated here.

2. On or about January 22, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly attempted to corruptly persuade Susan Landolf and M.M. to falsely tell federal agents that another R&V employee was responsible for obtaining physician signatures on the forged approval documents and that defendant ROBERT SAUL had no knowledge that the documents had been forged, with the intent to influence the testimony of Susan Landolf and M.M. in a federal grand jury proceeding.

In violation of Title 18, United States Code, Sections 1512(b)(1).

COUNT ONE HUNDRED FORTY-THREE

(Obstruction of Justice)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-12 and 14-31 of Count One and Paragraphs 2-3 of Count One Hundred Forty-One are incorporated here.

2. On or about February 11, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**R&V MEDICAL SUPPLIES, LLC and
ROBERT SAUL**

knowingly attempted to corruptly persuade Susan Landolf to sign a document that falsely stated, among other things, that defendant R&V, its members, officers, directors, employees and agents had fully complied with all appropriate laws, statutes and regulations concerning the operation of R&V and that she was not aware of any fact or circumstance which would be considered a violation of any applicable law or which would give rise to a fraudulent claim being submitted to Medicare or an insurance company, with the intent to influence the testimony of Susan Landolf in a federal grand jury proceeding.

In violation of Title 18, United States Code, Sections 1512(b)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 1341 and 1347 set forth in this indictment, defendants

**R&V MEDICAL SUPPLIES, LLC,
ROBERT SAUL and
SHEILA SAUL**

shall forfeit to the United States of America any property that constitutes or is derived from gross proceeds traceable to the commission of such offenses, including, but not limited to, the sum of \$1,200,000, including all funds in the following accounts:

Financial Institution	Account Owners(s)	Account Number	Approx. Balance
Bank of America	R&V	xxxxxxx84568	\$44,890.00
Bank of America	Robert Saul, Sheila Saul	xxxxxxx6403	\$100.00
Bank of America	Robert Saul, Sheila Saul	xxxxxxx0916	\$570,160.08
Bank of America	Robert Saul, Sheila Saul	xxxxxxx8724	\$10.39
Bank of America	Robert Saul, Sheila Saul	xxxxxxxxxx9843	\$97,122.65
Bank of America	Robert Saul	xxxxxxxxxx3648	\$24,212.35
Bank of America	Robert Saul	xxxxxxxxxx9781	\$2,016.80
Banc of America Investment Services, Inc.	Robert Saul, V.S.	xxxxx7341	\$71,854.26
TD Bank	Robert Saul, Sheila Saul	xxxxx6342	\$11,740.39
ING Direct	Robert Saul, Sheila Saul	xxxx7205	\$11,342.11

ING Direct – Securities	Robert Saul	xxxxxx7826	\$3,770.45
ING Direct – Securities	Sheila Saul	xxxxxx8103	\$3,471.30
Wachovia	R&V	xxxxxxxxxx9680	\$24,237.69

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (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; or
- (d) has been substantially diminished in value;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(7).

A TRUE BILL:

GRAND JURY FOREPERSON

MICHAEL L. LEVY
UNITED STATES ATTORNEY