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2020 SEP 29 AM 9: 29

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA)	Criminal No.
)	
v.)	Violation:
)	
(1) JESSICA JONES and)	<u>Count One:</u> Conspiracy
(2) ELIZABETH PUTULIN,)	(18 U.S.C. § 1349)
)	
)	<u>Forfeiture Allegation:</u>
)	(18 U.S.C. § 982(a)(7))
)	
Defendants)	
)	
)	
)	
)	

INFORMATION

At all times relevant to this Information:

General Allegations and Relevant Individuals

1. The defendants, Jessica Jones (“JONES”), Elizabeth Putulin (“PUTULIN”), Juan Camilo Perez Buitrago, a/k/a J.C. Perez, (hereinafter, “Perez”), and others known and unknown ran more than two dozen shell companies¹ that submitted and received payment for millions of dollars in false and fraudulent Medicare claims for durable medical equipment (“DME”).

¹ The companies included Alleviate Supply; Alpine Medical, Inc.; Altec Medical Supply Inc.; Armor Supply; Dermaclinical, Inc.; DermaTech, Inc.; Easy Health Braces, Inc.; E-Core Med, Inc.; Envision Bracing; Georgia Bracing Center, Inc.; Healthcore, Inc.; Integumentary Center, Inc.; Lumbar Store; Medtech, Inc.; Montana Med Supply; National Prescription Corp.; Optum Telemed, Inc.; Orthatech, Inc.; Orthofit Bracing, Inc.; Patella Medical, Inc.; Posture Store, Inc.; Prohealth Braces, Inc.; Skin Relief Supply, Inc.; Spinal Med, Inc.; Tequesta Bracing; The Brace Depot, Inc.; U.S. Mobility, Inc.; US Pharmacy Corp.; US Pharmacy, Inc.; Veltar Health Care Corp.; and Vermont Skin Specialist, Inc. (collectively, the “Shell Companies”).

2. Perez was the corporate officer of ten Shell Companies, including US Pharmacy Corp., which was incorporated in Massachusetts on or about February 20, 2014, and listed a principal office at 210 Park Avenue, Suite 289, Worcester, Massachusetts 01609.

3. JONES was an employee who worked for Perez from in or about January 2014 through December 2016.

4. PUTULIN was an employee who worked for Perez from in or about November 2016 through August 2019.

Medicare Coverage of Durable Medical Equipment

5. The Medicare Program (“Medicare”) is a federally-funded health care program providing benefits to individuals who are sixty-five years of age or older, or disabled. Medicare is administered by the Centers for Medicare and Medicaid Services (“CMS”), a federal agency under the United States Department of Health and Human Services. Medicare is a “health care benefit program” as defined in 18 U.S.C. § 24(b). Individuals who qualify for Medicare benefits are commonly referred to as Medicare “beneficiaries.”

6. Medicare is subdivided into multiple Parts. Medicare Part A covers health services provided by hospitals, skilled nursing facilities, hospices, and home health agencies. Medicare Part B covers physician services and outpatient care, including an individual’s access DME. Medicare Part C plans are Medicare health plans administered by private insurance companies (e.g., Aetna, Humana, and United Healthcare) that contract to provide Medicare beneficiaries the services provided by Medicare Part A and Part B plans, in addition to other benefits. CMS makes fixed, monthly payments to the private insurance companies that

