

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kristin Bailey, a Special Agent of the Federal Bureau of Investigation, duly sworn, do hereby depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been employed in this capacity since March 2011. I am currently assigned to a squad of the Palm Beach Resident Agency of the Miami Division that investigates a wide variety of federal crimes, including health care fraud. I have received training from the FBI on matters related to health care fraud investigations and have attended multiple conferences and seminars on conducting health care fraud investigations. I have investigated dozens of health care fraud cases.

2. This affidavit is submitted in support of a criminal complaint charging JOSE RAMON CHANG MORENO ("CHANG MORENO") with health care fraud, in violation of 18 U.S.C. § 1347.

3. This affidavit is based on my personal knowledge and investigation by others, including federal law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by interviewing witnesses and examining documents obtained in the course of the investigation, as well as through other means.

4. As the affidavit is submitted for the sole purpose of establishing probable cause, I have not set forth all information known to me about this investigation. Rather, I have set forth those facts and information which I believe are sufficient to establish probable cause.

PROBABLE CAUSE

5. The Medicare program is a federal health insurance program for the elderly and disabled. The United States Department of Health and Human Services ("HHS") is responsible for the administration of the Medicare program. The Centers for Medicare and Medicaid Services

("CMS") is the component agency of HHS that administers and supervises the Medicare Program.

6. Medicare covers the costs of certain medically necessary clinical treatments, medications, and medical equipment, provided that the services/medications/equipment are ordered or prescribed by a physician who certifies that this services/medications/equipment are medically necessary for the treatment of the patient. The order or prescription for the medical equipment must be personally signed and dated by the Medicare beneficiary's treating physician.

7. Part B of the Medicare program is a medical insurance program that pays providers and suppliers, with the exception of inpatient healthcare facilities, directly for goods and services; an example of which is durable medical equipment. Durable medical equipment, also known as "DME," is equipment that is designed for repeated use and for a medical purpose, such as prosthetic limbs, back braces, knee braces, and wheelchairs. CMS has contracted with CGS Administrators, LLC ("CGS") to be the Durable Medical Equipment Medicare Affiliated Contractor ("MAC") for Jurisdiction C, which includes the State of Florida. CGS's contract responsibilities are to receive, adjudicate, process, and pay certain claims for durable medical equipment submitted to it by Medicare beneficiaries and providers of medical services in the State of Florida.

8. To receive payment from Medicare, Part B providers are required to include the referring or prescribing physician's unique identification number, the dates of the services provided, the diagnoses of the conditions requiring the services, and the procedures performed on the claim form. The identification system used by Medicare to identify a rendering/referring/prescribing Physician is known as the National Provider Identification Number ("NPI"). An NPI is issued to only one individual provider and is a unique identifier for

that Provider. The referring physician is identified on each claim submitted using the physician's unique NPI. Additionally, each patient who visits a Medicare physician is identified by a unique identifier called a Health Insurance Claim Number ("HICN"). This number, also known as the patient's Medicare number, is composed of a unique string of numbers and letters assigned to one individual enrolled as a beneficiary in Medicare. Any claims received by Medicare without a referring/prescribing physician's NPI and a valid beneficiary's HICN are denied payment.

9. Florida Department of State records indicate that QUANTUM COMPLETE INC ("QUANTUM") is a Florida limited liability corporation that was organized on or about March 30, 2023, in West Palm Beach, which is within the Southern District of Florida.

10. Florida Department of State Records indicate that CHANG MORENO filed Articles of Incorporation on or about March 30, 2023, and identified himself as the sole corporate officer for QUANTUM.

11. On or around April 11, 2023, CHANG MORENO opened a bank account at Truist Bank in the name of QUANTUM.

12. On or about April 12, 2023, a Florida Profit Corporation Amended Articles of Incorporation was filed with the Florida Department of State adding CHANG MORENO as the President of QUANTUM.

13. On or about April 18, 2024, the application by QUANTUM for a Medicare Provider Transaction Number ("PTAN") was approved by Medicare and QUANTUM was assigned the PTAN of 8314360001. This PTAN authorized QUANTUM to bill the Medicare program for goods and services provided to Medicare beneficiaries that were medically necessary and prescribed by an approved health care professional.

14. Shortly thereafter, under its PTAN of 8314360001, QUANTUM began submitting claims electronically to Medicare. These claims were received by Medicare, processed, and submitted for payment.

15. A review of initial Medicare claims data information reveals that beginning on or about April 2024 and continuing through on or about June 2024, QUANTUM submitted multiple claims to Medicare in the amount of approximately \$9,403,423, and Medicare paid QUANTUM approximately \$4,980,418 for these claims.

16. The funds paid by Medicare to QUANTUM were received into the Truist bank account for QUANTUM that was opened by CHANG MORENO.

17. All the claims submitted by QUANTUM to Medicare between April 3, 2024, and June 27, 2024, used the unique NPIs of three separate physicians. The NPI is used to identify the physician who allegedly examined the beneficiary and prescribed the durable medical equipment, billed to Medicare for the beneficiary identified in the claims.

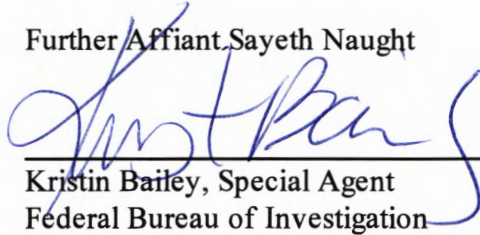
18. Each of the three physicians identified as the prescribing physician in claims billed by QUANTUM was interviewed by Agents. Each physician denied having seen or treated any of the beneficiaries that QUANTUM listed as receiving services from him or her. Each physician denied being affiliated with QUANTUM and denied prescribing any DME products to these beneficiaries or any beneficiaries.

CONCLUSION

Based upon my investigation and the above stated information, I have probable cause to believe that from on or about April 3, 2024, and continuing through on or about June 27, 2024,

JOSE RAMON CHANG MORENO committed health care fraud, in violation of Title 18,
United States Code, Section 1347 (Health Care Fraud).

Further Affiant Sayeth Naught



Kristin Bailey, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me by applicant
by telephone ~~(Face Time)~~ per the requirements of
Fed. R. Crim. P. 4(d) and 4.1
this 27th day of June, 2025.



HON. WILLIAM MATTHEWMAN
UNITED STATES MAGISTRATE JUDGE