

IRWIN

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CR. No. <u>26-cr-20269 TLP</u>
	)	
v.	)	18 U.S.C. § 1028(a)(7)
	)	18 U.S.C. § 1343
HEATHER MAY WILBANKS GREENE,	)	
	)	
Defendant.	)	

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Indictment:

A. Background

1. Heather May Wilbanks Greene, defendant, resided in Cordova, Tennessee, and Memphis, Tennessee. Currently, the defendant is a resident of Lepanto, Arkansas.

2. The Tennessee Board of Nursing (“TBN”) is a health-related board operated by the Tennessee Department of Health. Among other activities, the TBN articulates standards of licensure for registered nurses in the State of Tennessee. To become a registered nurse in the state of Tennessee, an applicant must, among other requirements, graduate from a registered nurse pre-licensure program approved by the TBN, obtain a passing score on the National Council Licensure Examination – Registered Nurse (NCLEX-RN), and meet certain character and fitness requirements.

3. Once an applicant completes the licensing requirements, the applicant receives a license issued by the Tennessee Department of Health that permits the

individual to practice and provide health care as a registered nurse to patients. The Tennessee Department of Health also issues a unique registered nurse license number to the individual. That unique license number is a means of identification for the registered nurse. It is against the law in the state of Tennessee to impersonate or falsely represent oneself as a licensed registered nurse.

4. Health care providers are professionals or businesses that routinely provide medical benefits, items, and services to patients, often for a fee or charge. Health care providers routinely employ licensed registered nurses to help provide these benefits, items, and services.

5. Health care benefit programs are public or private plans or contracts, affecting interstate commerce, under which any medical benefit, item, or services is provided and for which payment may be made under the plan or contract. Public health care benefit programs include programs like Medicare, Medicaid (TennCare). Private health care benefit programs include private health insurance companies.

6. Medicare is a federally funded health care program for those sixty-five (65) years old and older, as well as certain disabled persons. Medicare is funded by taxes on employees and premiums paid by Medicare recipients, also known as Medicare “beneficiaries.” Medicare is a “health care benefit program.” 18 U.S.C. § 24(b). Medicare is administered by the United States Department of Health and Human Service (HHS) through its component agency, the Centers for Medicare and Medicaid Services (CMS). CMS contracts with private health insurance companies known as Medicare Administrative Contractors (MAC) to process and pay Medicare claims.

7. Medicare is divided into a number of parts, providing coverage for various

types of health care services: Part A for inpatient services (hospital and skilled nursing); Part B for physician and laboratory services; Part C for managed care plans where Medicare beneficiaries enroll with private insurance companies who receive a monthly, per beneficiary, fixed payment from HHS to receive inpatient, physician and laboratory services through contracted hospitals and providers; and Part D for prescription drug services.

8. The Tennessee Medicaid Program (TennCare) is also a “health care benefit program.” 18 U.S.C. § 24(b). TennCare provides benefits to Tennessee residents who meet certain eligibility requirements, including income requirements. TennCare is a jointly funded federal-state program.

9. The Waters of Memphis Skilled Nursing and Rehabilitation, Parkway Health and Rehabilitation Center, St. Clare Health and Rehabilitation, and Ripley Healthcare and Rehabilitation Center are skilled nursing facilities that provide non-acute and skilled nursing care services. These facilities receive payments through the government health care benefit programs Medicare and Medicaid.

B. Scheme to Defraud

10. Beginning on or about September 2020, through on or about October 2023, the defendant, **HEATHER MAY WILBANKS GREENE**, devised and intended to devise a scheme to defraud health care providers in the Western District of Tennessee and elsewhere and to obtain money and property from health care providers by means of materially false and fraudulent pretenses, representations and promises.

11. The defendant, **HEATHER MAY WILBANKS GREENE**, attended Jackson State Community College for one semester in 2011 with a declared major in Pre-Nursing

RN. The defendant never completed the first semester, never completed the nursing program and never received a college degree from Jackson State Community College. To date, the defendant has never graduated from a registered nurse pre-licensure program approved by the TBN.

12. The defendant, **HEATHER MAY WILBANKS GREENE**, has never applied to become a registered nurse in the state of Tennessee and has never obtained a passing score on the National Council Licensure Examination-Registered Nurse (NCLEX-RN).

C. Manner and Means

13. At some point prior to September 2020, the defendant, HEATHER MAY WILBANKS GREENE, developed a scheme to obtain employment as a registered nurse, even though she did not have a registered nurse license. Under her scheme, the defendant falsely claimed to health care providers that she held a nursing degree from South Carolina State University when she did not and falsely claimed that she had a valid Tennessee registered nurse's license when she did not.

14. As part of the scheme, the defendant would apply for registered nurse positions by emailing her resume to health care providers using the email address ~~XXXXXXXXXXXXXXXXXXXX~~. The defendant would falsely state in her resume that she had a bachelor of science degree in nursing from South Carolina State University or another college or university. The defendant would falsely state in her resume that she had experience as a registered nurse with several health care providers where the information could not be validated.

15. To bolster her misrepresentations, it was part of the scheme that the defendant would obtain the names and license numbers of real registered nurses who

had the same first and last name as the defendant, but different middle names. The defendant would then use the partial names of these nurses along with their Tennessee registered nurse license numbers to apply for employment as a licensed registered nurse.

16. When questioned about why the date of birth associated with the registered nurse license number was different from the defendant's date of birth, the defendant took steps with TBN to change the date of birth, address and telephone number of the actual registered nurse's license number to the defendant's own date of birth, home address and telephone number.

17. The license number of a registered nurse is an important means of identification as it is a required legal credential and a prerequisite for registered nurses to secure work in the state of Tennessee.

18. The defendant, **HEATHER MAY WILBANKS GREENE**, obtained and used the Tennessee registered nurse license numbers of HDCG (**475) and HERG (**809) to secure employment as a license registered nurse in more than 30 health care facilities throughout the state of Tennessee as well as Arkansas.

19. It was further part of the scheme that, once hired as a licensed registered nurse by a health care facility/provider, the defendant, **HEATHER MAY WILBANKS GREENE**, would engage or attempt to engage in the profession of licensed registered nursing, to include delivering medical treatment, services, medications, and items to patients; obtaining sensitive, confidential, and private medical information from patients, and evaluating and diagnosing medical conditions of patients, even though the defendant lacked the formal education, training, credentials, and lawful authority to do so.

20. It was further part of the scheme that the defendant, **HEATHER MAY WILBANKS GREENE**, would obtain property in the form of compensation and other employee benefits from health care providers that she otherwise was not entitled to receive because she was not a licensed registered nurse. Had the health care providers known the defendant was not a licensed registered nurse, they would never have employed her as a registered nurse.

D. Execution of the Scheme

21. In or about September 2020, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Bethany Center Rehabilitation and Healing, a nursing home in Nashville, Tennessee. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired and worked from September 18, 2020, through September 29, 2020, and fraudulently obtained \$800.

22. In or about October 2020, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Trevecca Center for Rehabilitation and Healing, a nursing home in Nashville, Tennessee. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired and worked from October 4, 2020, through November 4, 2020, and fraudulently obtained \$11,497.

23. In or about December 2020, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Nashville Center for Rehabilitation and Healing, a nursing home in Nashville, Tennessee. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired and worked from December 11, 2020, through December 30, 2020, and fraudulently

obtained \$4,943.

24. In or about June 2021, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Consolidated Medical Staffing, a health care provider staffing agency with locations in Nashville and Memphis, Tennessee. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired and worked from June 15, 2021, to June 11, 2023, at approximately 28 different health care facilities and fraudulently obtained \$95,000.

25. In or about August 2021, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Tyson Foods, in Shelbyville, Tennessee. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired and worked from August 9, 2021, through August 26, 2021, and fraudulently obtained \$3,789.

26. In or about April 2022, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with The Waters of Smyrna Rehabilitation and Skilled Nursing Facility, a nursing home in Smyrna, Tennessee. The defendant fraudulently used the Tennessee license number of HERG (**089). The defendant was hired and worked from April 10, 2022, through August 13, 2022, and fraudulently obtained \$41,134.

27. In or about August 2020, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with the Waters of Memphis Skilled Nursing and Rehabilitation, a nursing home in Memphis, Tennessee. The defendant fraudulently used the Tennessee license number of HERG (**089). The defendant was hired and worked from August 15, 2022, through September 8, 2022, and fraudulently

obtained \$19,945.

28. In or about November 2022, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Core Civic, a private corrections and detention company that operates several prisons under contract with the state of Tennessee. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired to work as a licensed registered nurse at Whiteville Correctional Facility in the Medical Services Unit in Whiteville, Tennessee. The defendant worked from November 14, 2022, through December 13, 2022, and fraudulently obtained \$3,953.

29. In or about March 2023, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Rector Nursing and Rehabilitation, a nursing home in Rector, Arkansas. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired and worked from March 30, 2023, through May 11, 2023, and fraudulently obtained \$8,942.

30. In or about June 2023, the defendant, **HEATHER MAY WILBANKS GREENE**, sought employment as a registered nurse with Wellpath Staffing Agency, a private health care company that contracts with government entities to provide medical and mental health staff to jails, prisons and residential treatment facilities. The defendant fraudulently used the Tennessee license number of HDCG (**475). The defendant was hired to work at Shelby County Corrections – Jail East in Memphis, Tennessee. The defendant worked from June 26, 2023, through October 2, 2023, and fraudulently obtained \$35,347.

COUNT 1
IDENTITY THEFT

The Grand Jury further charges:

The allegations contained in paragraphs 1 through 30 of this Indictment are repeated and realleged as if fully set forth within.

Beginning on or about August 15, 2022, and continuing through on or about September 8, 2022, in the Western District of Tennessee, the defendant,

HEATHER MAY WILBANKS GREENE

did knowingly possess and use without lawful authority, in and affecting interstate commerce, the means of identification of another person, with the intent to commit and in connection with an unlawful activity that constitutes a felony violation of Tenn. Code Ann. 39-16-302. Specifically, **HEATHER MAY WILBANKS GREENE** fraudulently used the partial name and state of Tennessee registered nurse license number of HERG to seek and gain employment at The Waters of Memphis in Memphis, Tennessee, thereby obtaining property and monies having an aggregate value of \$1,000 or more within a one-year period.

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT 2
IDENTITY THEFT

The Grand Jury further charges:

The allegations contained in paragraphs 1 through 30 of this Indictment are repeated and realleged as if fully set forth within.

Beginning on or about June 26, 2023, and continuing through on or about October 2, 2023, in the Western District of Tennessee, the defendant,

HEATHER MAY WILBANKS GREENE

did knowingly possess and use without lawful authority, in and affecting interstate commerce, the means of identification of another person, with the intent to commit and in connection with an unlawful activity that constitutes a felony violation of Tenn. Code Ann. 39-16-302. Specifically, **HEATHER MAY WILBANKS GREENE** fraudulently used the partial name and state of Tennessee registered nurse license number of HDCG to seek and gain employment at Wellpath Staffing in Memphis, Tennessee, thereby obtaining property and monies having an aggregate value of \$1,000 or more within a one-year period.

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT 3
WIRE FRAUD

The Grand Jury further charges:

The allegations contained in paragraphs 1 through 30 of this Indictment are repeated and realleged as if fully set forth within.

On or about November 14, 2022, in the Western District of Tennessee, the defendant,

HEATHER MAY WILBANKS GREENE

being aided and abetted by others, known and unknown to the Grand Jury, for the purpose of executing the scheme and artifice described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce signals and sounds, that is, by emailing Core Civic a copy of her resume using the Google

account ~~XXXXXXXXXXXX~~m, which falsely showed that the defendant had a bachelor of science degree in registered nursing and had the skills, training and experience as a practicing registered nurse since February 2010.

All in violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL:

F O R E P E R S O N

DATED: June 18, 2026

**D. MICHAEL DUNAVANT
UNITED STATES ATTORNEY
WESTERN DISTRICT OF TENNESSEE**

IRWIN

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v.	)	18 U.S.C. § 1028(a)(7)
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HEATHER MAY WILBANKS GREENE,	)	
	)	
Defendant.	)	

NOTICE OF PENALTIES

COUNTS 1 2
(Identit Theft)

nmt 5 years imprisonment, nmt \$250,000 fine, or both, nmt a 3 yr. period of supervised release and a special assessment of \$100, see 18 U.S.C. § 3013 (a) .

COUNT 3
(Wire Fraud)

nmt 20 yrs. imprisonment; nmt \$250,000 fine, or both, nmt a 3 yr. period of supervised release and a special assessment of \$100, see 18 U.S.C. § 3013 (a) .