(1)

RULE 9 WARRANT

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

STATE OF DELAWARE	)	
	)	**INDICTMENT BY THE GRAND**
v.	)	**JURY**
	)	
CHRISTINA JOHNSON	)	**I.D. # 2606009549**
	)	

The Grand Jury charges CHRISTINA JOHNSON with the following offenses:

COUNT I. A FELONY # 26-06-0854W

HEALTH CARE FRAUD, in violation of Title 11, Section 913A(a)(1) of the Delaware Code.

CHRISTINA JOHNSON, between the 31st day of March 2024 and the 6th day of April 2024, in the County of New Castle, State of Delaware, did knowingly present or cause to be presented fraudulent health care claims to the Delaware Medicaid and Medical Assistance program.

FILED
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COUNT II. A FELONY # 26-06-0855W

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code of 1974, as amended.

CHRISTINA JOHNSON, between the 31st day of March 2024 and the 6th day of April 2024, in the County of New Castle, State of Delaware, intending to promote or facilitate the commission of Healthcare Fraud as set forth in Count 1 of this Indictment, did agree with TALANNI WEBSTER to commit said crime, and one or more of them did conduct an overt act in pursuance of said conspiracy, by engaging in conduct constituting the crime of Healthcare Fraud, or an attempt to commit same or by committing some other substantial step in pursuance of the conspiracy.

COUNT III. A FELONY # 26-06-0856W

THEFT, in violation of Title 11, Section 841 of the Delaware Code.

CHRISTINA JOHNSON, between the 31st day of March 2024 and the 6th day of April 2024, in the County of New Castle, State of Delaware, did take, exercise control over, or obtain property of the Delaware Medicaid and Medical Assistance program consisting of payments in United States Currency valued at more than $1,500.00, intending to deprive the Delaware Medicaid and Medical Assistance program of same, or to appropriate same.

COUNT IV. A FELONY # 26-06-0857W

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code of 1974, as amended.

CHRISTINA JOHNSON, between the 31st day of March 2024 and the 6th day of April 2024, in the County of New Castle, State of Delaware, intending to promote or facilitate the commission of Theft as set forth in Count 3 of this Indictment, did agree with TALANNI WEBSTER to commit said crime, and one or more of them did conduct an overt act in pursuance of said conspiracy, by engaging in conduct constituting the crime of theft, or an attempt to commit same or by committing some other substantial step in pursuance of the conspiracy.

COUNT V. A MISEMEANOR #26-06-0858W

FALSIFYING BUSINESS RECORDS in violation of Title 11, Section 871 of the Delaware Code.

CHRISTINA JOHNSON, between the 31st day of March 2024 and the 6th day of April 2024, in the County of New Castle, State of Delaware, with intent to defraud, did make or cause a false entry in the business records of an enterprise, Jewish Employment Vocational Services.

COUNT VI. A MISEMEANOR # 26-06-0859W

CONSPIRACY THIRD DEGREE in violation of Title 11, Section 511 of the Delaware Code of 1974, as amended.

CHRISTINA JOHNSON, between the 31st day of March 2024 and the 6th day of April 2024, in the County of New Castle, State of Delaware, intending to promote or facilitate the commission of the misdemeanor of Falsification of Business Records as set forth in Count 5 of this Indictment, did agree with TALANNI WEBSTER to commit said crime, and one or more of them did conduct an overt act in pursuance of said conspiracy, by engaging in conduct constituting the crime of Falsification of Business Records, or an attempt to commit same or by committing some other substantial step in pursuance of the conspiracy.

A TRUE BILL

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(FOREPERSON)

KATHLEEN JENNINGS
ATTORNEY GENERAL

Tess Barchi

DEPUTY ATTORNEY GENERAL