

Sep 9, 2021

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
21-60262-CR-SINGHAL/SNOW
Case No. _____

42 U.S.C. § 408(a)(7)(B)

18 U.S.C. § 1028A(a)(1)

UNITED STATES OF AMERICA

vs.

PATRICIA M. CLEARY,
a/k/a Patricia M. Cleary Syling,
a/k/a Patricia M. Syling,
a/k/a Patricia A. Cleary,

Defendant.

_____/

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. The Florida Medicaid Program ("Medicaid") was a partnership between the State of Florida and the federal government that provided health care benefits to certain low-income individuals and families in Florida. Medicaid was administered by the Centers for Medicare and Medicaid Services and the State of Florida's Agency for Health Care Administration.

2. Medicaid Managed Care was a health care delivery system organized to manage cost, utilization, and quality. Medicaid Managed Care provided for the delivery of Medicaid health benefits and additional services through contracts between Medicaid and Managed Care Organizations (MCOs).

3. Company 1 was a Florida corporation located in Broward County, in the Southern District of Florida, that operated as a MCO.

COUNT 1
Falsely Representing a Social Security Number
(42 U.S.C. § 408(a)(7)(B))

1. The General Allegations section of this Indictment is realleged and by this reference incorporated herein.

2. On or about September 23, 2020, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

PATRICIA M. CLEARY,
a/k/a Patricia M. Cleary Syling,
a/k/a Patricia M. Syling,
a/k/a Patricia A. Cleary,

for the purpose of obtaining a thing of value from a person, that is, obtaining employment with Company 1, and with intent to deceive, did knowingly and falsely represent a number, that is xxx-xx-8704, to be the social security account number assigned by the Commissioner of Social Security to her, when in fact such number was not the social security account number assigned by the Commissioner of Social Security to her, in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 2
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

1. The General Allegations section of this Indictment is realleged and by this reference incorporated herein.

2. On or about September 23, 2020, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

PATRICIA M. CLEARY,
a/k/a Patricia M. Cleary Syling,
a/k/a Patricia M. Syling,
a/k/a Patricia A. Cleary,

during and in relation to a felony violation of Title 42, United States Code, Section 408(a)(7)(B), that is, for the purpose of obtaining a thing of value from a person, that is, obtaining employment with Company 1, and with intent to deceive, knowingly and falsely representing a number, that is xxx-xx-8704, to be the social security account number assigned by the Commissioner of Social Security to her, as charged in Count 1 of this Indictment, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, that is, the social security number of another individual in violation of Title 18, United States Code, Section 1028A(a)(1).

A ~~TRUE~~ BILL

FOREPERSON



JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY



MARC T. CANZIO
SPECIAL ASSISTANT U.S. ATTORNEY