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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF KENTUCKY SOUTHERN DIVISION LONDON

Eastern District of Kentucky JUN 17 2024

ATTRANKFORT Robert R. Car CLERK U.S. DISTRICT COURT

UNITED STATES OF AMERICA

V.

INFORMATION NO. <u>6-24-LR-37</u>-CHO-1 18 U.S.C. § 1347

STEPHANIE COLLINS

* * * * *

THE UNITED STATES ATTORNEY CHARGES:

<u>COUNT 1</u> 18 U.S.C. § 1347

1. From approximately January 2014, the exact date being unknown, and continuing through approximately June 2020, in Knox County, in the Eastern District of Kentucky, and elsewhere,

STEPHANIE COLLINS

knowingly and willfully executed, and attempted to execute, a scheme to defraud one or more health care benefit programs affecting commerce as defined by 18 U.S.C. § 24(b), that is, Medicare and Kentucky Medicaid, and to obtain, by means of false and fraudulent pretenses, money and property owned by, and under the custody of, Medicare and Kentucky Medicaid, in connection with the delivery of, and payment for, health care benefits, items, and services, to wit, causing claims for payment to be submitted for prescription drugs that were never dispensed, all in violation of 18 U.S.C. § 1347.

FORFEITURE ALLEGATION 18 U.S.C. § 982(a)(7)

1. Upon conviction of the offense charged in Count 1 of this Information, **STEPHANIE COLLINS** shall forfeit to the United States any and all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the violation of 18 U.S.C. § 1347. Any and all interest that **STEPHANIE COLLINS** has in this property is vested in and forfeited to the United States pursuant to 18 U.S.C. § 982(a)(7).

2. The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT:

A forfeiture money judgment in the amount of \$730,055.78, which represents the amount of proceeds that the Defendant obtained as a result of the violation.

3. If any of the property listed above, as a result of any act or omission of the

Defendant(s), (A) cannot be located upon the exercise of due diligence; (B) has been transferred or sold to, or deposited with, a third party; (C) has been placed beyond the jurisdiction of the court; (D) has been substantially diminished in value; or (E) has been commingled with other property which cannot be divided without difficulty, the United States shall be entitled to forfeit substitute property pursuant to 21 U.S.C. § 853(p).

MmsSn

CARLTON S. SHIER IV UNITED STATES ATTORNEY

PENALTIES

- **COUNT 1:** Not more than 10 years imprisonment, a fine of not more than \$250,000 or the greater of twice the gross gain or twice the gross loss, and supervised release of not more than 3 years.
- PLUS: Mandatory special assessment of \$100 per count.
- PLUS: Restitution, if applicable.