

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT LOUISVILLE

**FILED**  
JAMES J. VILT, JR. - CLERK  
JUN 18 2024

UNITED STATES OF AMERICA

v.

**TAMMY DANIELS**, a/k/a TAMMY RICHARDSON

U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

INDICTMENT

NO. **3:24-cr-74-DJH**  
18 U.S.C. § 2  
18 U.S.C. § 981  
18 U.S.C. § 982  
18 U.S.C. § 1343  
18 U.S.C. § 1347

The Grand Jury charges:

COUNTS 1-5  
(*Wire Fraud*)

1. On or about and between March 11, 2016, and March 31, 2022, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendant, **TAMMY DANIELS**, a/k/a TAMMY RICHARDSON, aided and abetted by others, known and unknown to the Grand Jury, devised and intended to devise a scheme to defraud Victim A, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing said scheme, caused signs, signals, and sounds to be transmitted in interstate commerce.

2. It was part of the scheme that **TAMMY DANIELS**, while employed as the accounts manager for Victim A's medical practice, used Victim A's company credit cards to purchase personal items, transferred money from Victim A's Fifth Third Bank account to pay the credit card invoices, transferred money from Victim A's Fifth Third Bank account to pay for other personal credit card purchases, and used her access and position to bill for false and fraudulent medical procedures to pay credit card invoices in order to hide the unlawful use of the credit cards, all without Victim A's knowledge and authorization.

3. Victim A's medical practice used credit cards to purchase necessary items for the medical practice. It was further part of the scheme that **TAMMY DANIELS** used both business credit cards to make personal purchases on Amazon, and subsequently, used Victim A's medical practice's Fifth Third Bank account to pay the monthly credit card invoices without Victim A's knowledge and authority.

4. It was further part of the scheme that **TAMMY DANIELS** used Victim A's medical practice's Fifth Third Bank account to pay her and Associate 1's personal credit card invoices without Victim A's knowledge and authority.

5. On or about and between the dates listed below, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendant, **TAMMY DANIELS**, for the purpose of executing the scheme to defraud, and attempting to do so, caused to be transmitted by means of wire communications, in interstate commerce, the signals and sounds described below for each count:

COUNT	DATE	DESCRIPTION OF WIRE	AMOUNT
1	February 19, 2020	Fifth Third Bank acct# xxxx5203 to Capital One acct# xxx2842 which caused an interstate wire transaction to be initiated inside the Western District of Kentucky to outside of Kentucky.	\$3,523.22
2	January 9, 2021	Payment made to Amazon Acct #xxxx8448 which caused an interstate wire transaction to be initiated inside the Western District of Kentucky to outside of Kentucky.	\$157.94
3	February 2, 2021	Fifth Third Bank acct# xxxx5203 to Capital One acct# xxx2842 which caused an interstate wire transaction to be initiated inside the Western District of Kentucky to outside of Kentucky.	\$1,629.08
4	February 22, 2021	Payment made to Amazon Acct #xxxx8448 which caused an interstate wire transaction to be initiated inside the Western District of Kentucky to outside of Kentucky.	\$31.79

5	June 28, 2021	Fifth Third Bank acct# xxxx5203 to Capital One acct# xxx9991 which caused an interstate wire transaction to be initiated inside the Western District of Kentucky to outside of Kentucky.	\$619.72
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6. By means of such fraud, **TAMMY DANIELS** attempted to obtain and obtained funds to which she knew she was not entitled totaling over \$750,000.

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

The Grand Jury further charges:

COUNTS 6-13  
(*Health Care Fraud*)

On or about and between the dates listed below, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendant, **TAMMY DANIELS**, a/k/a TAMMY RICHARDSON, aided and abetted by others, known and unknown to the Grand Jury, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud health care benefit programs, and to obtain, by means of false and fraudulent pretenses, representations, and promises money and property owned by, and under the custody and control of the health care benefit program, in connection with the delivery of, and payment for, health care benefits, items, and services.

In execution of the scheme to defraud, **TAMMY DANIELS** caused to be submitted the following false and fraudulent health care claims to health care benefit programs, including Medicare, which claims were false and fraudulent because the medical procedures did not occur. As a result of the fraudulent scheme, health care benefit programs, including Medicare, were billed \$422,625.00 and paid \$79,324.93.

COUNT	PATIENT	BILLED SERVICE	SERVICE DATE	HEALTH CARE BENEFIT PROGRAM
6	D.S.	Injection	May 25, 2021	Medicare
7	D.S.	Injection	June 25, 2021	Medicare
8	I.S.	Injection	March 25, 2021	Medicare
9	L.M	Injection	January 8, 2021	Medicare
10	L.M	Injection	February 8, 2021	Medicare
11	M.S.	Injection	March 23, 2021	Medicare
12	R.M.	Injection	January 15, 2021	Medicare
13	R.M.	Injection	March 15, 2021	Medicare

In violation of Title 18, United States Code, Sections 1347 and 2.


### NOTICE OF FORFEITURE

If convicted of any violation of Title 18, United States Code, Sections 1343 and 1347, the defendant, **TAMMY DANIELS**, a/k/a TAMMY RICHARDSON, shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of any such violation.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(7), and Title 28, United States Code, Section 2461.

A TRUE BILL.

**Redacted**

  
 MICHAEL A. BENNETT  
 UNITED STATES ATTORNEY

MAB:JRA 6/18/2024



UNITED STATES OF AMERICA v. **TAMMY DANIELS, A/K/A TAMMY RICHARDSON**

**PENALTIES**

Counts 1-5: NM 20 yrs/\$250,000 fine/both/NM 3 yrs. Supervised Release (each count)  
Counts 6-13: NM 10 yrs/\$250,000 fine/both/NM 3 yrs. Supervised Release (each count)  
Forfeiture

**NOTICE**

**ANY PERSON CONVICTED OF AN OFFENSE AGAINST THE UNITED STATES SHALL BE SUBJECT TO SPECIAL ASSESSMENTS, FINES, RESTITUTION & COSTS.**

**SPECIAL ASSESSMENTS**

18 U.S.C. § 3013 requires that a special assessment shall be imposed for each count of a conviction of offenses committed after November 11, 1984, as follows:

Misdemeanor: \$ 25 per count/individual	Felony: \$100 per count/individual
\$125 per count/other	\$400 per count/other

**FINES**

In addition to any of the above assessments, you may also be sentenced to pay a fine. Such fine is due immediately unless the court issues an order requiring payment by a date certain or sets out an installment schedule. You shall provide the United States Attorney's Office with a current mailing address for the entire period that any part of the fine remains unpaid, or you may be held in contempt of court. 18 U.S.C. § 3571, 3572, 3611, 3612

**Failure to pay fine as ordered may subject you to the following:**

1. **INTEREST** and **PENALTIES** as applicable by law according to last date of offense.

For offenses occurring after December 12, 1987:

No **INTEREST** will accrue on fines under \$2,500.00.

**INTEREST** will accrue according to the Federal Civil Post-Judgment Interest Rate in effect at the time of sentencing. This rate changes monthly. Interest accrues from the first business day following the two week period after the date a fine is imposed.

**PENALTIES** of:

10% of fine balance if payment more than 30 days late.

15% of fine balance if payment more than 90 days late.

2. Recordation of a **LIEN** shall have the same force and effect as a tax lien.
3. Continuous **GARNISHMENT** may apply until your fine is paid.

18 U.S.C. §§ 3612, 3613

If you **WILLFULLY** refuse to pay your fine, you shall be subject to an **ADDITIONAL FINE** of not more than the greater of \$10,000 or twice the unpaid balance of the fine; or **IMPRISONMENT** for not more than 1 year or both. 18 U.S.C. § 3615

#### RESTITUTION

If you are convicted of an offense under Title 18, U.S.C., or under certain air piracy offenses, you may also be ordered to make restitution to any victim of the offense, in addition to, or in lieu of any other penalty authorized by law. 18 U.S.C. § 3663

#### APPEAL

If you appeal your conviction and the sentence to pay your fine is stayed pending appeal, the court shall require:

1. That you deposit the entire fine amount (or the amount due under an installment schedule during the time of your appeal) in an escrow account with the U.S. District Court Clerk, or
2. Give bond for payment thereof.

18 U.S.C. § 3572(g)

#### PAYMENTS

If you are ordered to make payments to the U.S. District Court Clerk's Office, certified checks or money orders should be made payable to the Clerk, U.S. District Court and delivered to the appropriate division office listed below:

LOUISVILLE:	Clerk, U.S. District Court 106 Gene Snyder U.S. Courthouse 601 West Broadway Louisville, KY 40202 502/625-3500
BOWLING GREEN:	Clerk, U.S. District Court 120 Federal Building 241 East Main Street Bowling Green, KY 42101 270/393-2500
OWENSBORO:	Clerk, U.S. District Court 126 Federal Building 423 Frederica Owensboro, KY 42301 270/689-4400
PADUCAH:	Clerk, U.S. District Court 127 Federal Building 501 Broadway Paducah, KY 42001 270/415-6400

If the court finds that you have the present ability to pay, an order may direct imprisonment until payment is made.