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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2014 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.LORI RENEE MILLER,
NGUYET GALAZ,
ANGELA FRANCES MICKLO,
MARIBEL NAVARRO,
CARREDA JEFFREY,
LALONNIE EGANS,
TINA LYNN ST. JULIAN, and
SHYRIE WOMACK,
Defendants.

CR No. 15

C R 15 - 0474I N D I C T M E N T[18 U.S.C. § 1347: Health Care
Fraud; 18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft; 18
U.S.C. § 2(b): Causing an Act to
be Done]

The Grand Jury charges:

COUNTS ONE THROUGH THIRTY-TWO

[18 U.S.C. §§ 1347, 2(b)]

A. INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

ARS and the Defendants1. Atlantic Recovery Services, later called Atlantic Health
Services ("ARS"), was a private provider of alcohol and drug abuse

LSC

1 treatment services, with its business office in Long Beach,
2 California, within the Central District of California. ARS was
3 certified to provide services under the Drug Medi-Cal program,
4 described below. ARS operated alcohol and drug treatment programs at
5 various high schools and middle schools in Los Angeles County,
6 California, within the Central District of California, until in or
7 about mid-April 2013.

8 2. Defendant LORI RENEE MILLER ("defendant MILLER") was hired
9 as a substance abuse recovery counselor by ARS in or about April
10 2000. In or about April 2001, defendant MILLER became a manager for
11 ARS, and in or about April 2003, defendant MILLER became the Program
12 Manager for ARS. As the Program Manager, defendant MILLER supervised
13 ARS substance abuse recovery managers and counselors. Defendant
14 MILLER reported to the President and Chief Executive Officer of ARS.

15 3. Defendant NGUYET GALAZ ("defendant GALAZ") was hired as a
16 substance abuse recovery counselor by ARS in or about 2001. She
17 became the Coordinator of Youth Services in or about March or April
18 2003 and the Director of Youth Services in or about late 2004. In or
19 about July 2010, defendant GALAZ was promoted to a different director
20 position at ARS, a position in which she remained until in or about
21 October 2012. As a director, defendant GALAZ supervised certain ARS
22 managers, including defendant CARRENDA JEFFREY, Elizabeth Black, Erin
23 Hoover, and, for a short period of time, defendant LALONNIE EGANS.
24 The managers defendant GALAZ supervised in turn supervised counselors
25 at approximately eleven ARS sites in Los Angeles County, namely, ARS
26 South, Lakewood High School, Soledad Enrichment Action ("SEA")
27 Compton, SEA Crenshaw, SEA Firestone, SEA Girls Academy, SEA Long
28 Beach, SEA Manchester, SEA North Long Beach, SEA South Gate, and

1 Wilson High School. Defendant GALAZ was supervised by defendant
2 MILLER.

3 4. Defendant ANGELA FRANCES MICKLO ("defendant MICKLO") was
4 hired as a substance abuse recovery counselor by ARS in or about
5 January 2001. In or about May 2003, defendant MICKLO became a
6 manager for ARS. As a manager, defendant MICKLO supervised ARS
7 substance abuse recovery counselors at approximately nine sites in
8 Los Angeles County, namely, the Antelope Valley Administrative
9 Office, Antelope Valley Community Day School ("CDS"), Division Street
10 CDS, West Side, Technology Drive CDS, Eastside CDS, SEA Manchester,
11 SEA Pacoima, and SEA North Hills. Defendant MICKLO was supervised by
12 defendant MILLER.

13 5. Defendant MARIBEL NAVARRO ("defendant NAVARRO") was hired
14 as a substance abuse recovery counselor by ARS in or about March
15 2001. In or about September 2004, defendant NAVARRO became a Youth
16 Services Coordinator for ARS, and in or about February 2011,
17 defendant NAVARRO became a manager for ARS. As a Youth Services
18 Coordinator and a manager, defendant NAVARRO supervised ARS substance
19 abuse recovery counselors at approximately ten sites in Los Angeles
20 County, namely, Montebello High School MS-3, Bell Gardens High School
21 MAC-7, Boys and Girls Club MS-10, Odyssey (LA1), Taylor CDS MS-2,
22 Montebello Intermediate MS-8, Montebello High School MS-9, Harding
23 MS-12/13, Vail High School MS-14, and Bell Gardens Intermediate.
24 Defendant NAVARRO was supervised by defendant MILLER.

25 6. Defendant CARREDA JEFFREY ("defendant JEFFREY") was hired
26 as a substance abuse recovery counselor by ARS in or about September
27 2002. In or about April 2005, defendant JEFFREY became a manager for
28 ARS. As a manager, defendant JEFFREY supervised ARS substance abuse

1 recovery counselors at approximately three sites in Los Angeles
2 County, namely, SEA Crenshaw, SEA Girls Academy, and SEA Compton.
3 Defendant JEFFREY was supervised by defendants MILLER and GALAZ.

4 7. Defendant LALONNIE EGANS ("defendant EGANS") was hired as a
5 substance abuse recovery counselor by ARS in or about May 2002. In
6 or about April 2008, defendant EGANS became a manager for ARS. As a
7 manager, defendant EGANS supervised ARS substance abuse recovery
8 counselors at approximately three sites in Los Angeles County,
9 namely, SEA Manchester, SEA Norwalk, and SEA Firestone. Defendant
10 EGANS also worked as a counselor at SEA Manchester for approximately
11 seven months during this time. Defendant EGANS was supervised by
12 defendants MILLER and GALAZ.

13 8. Defendant TINA LYNN ST. JULIAN ("defendant ST. JULIAN") was
14 hired as a substance abuse recovery counselor by ARS in or about
15 August 2006. As a substance abuse recovery counselor, defendant ST.
16 JULIAN worked at approximately two ARS sites in Los Angeles County,
17 namely, SEA Manchester and SEA Firestone. Defendant ST. JULIAN was
18 supervised by Elizabeth Black and defendants MICKLO and EGANS.
19 Defendant ST. JULIAN stopped working for ARS in or about October
20 2011.

21 9. Defendant SHYRIE WOMACK ("defendant WOMACK") was hired as a
22 substance abuse recovery counselor by ARS in or about July 2006. As
23 a substance abuse recovery counselor, defendant WOMACK worked at
24 approximately three ARS sites in Los Angeles County, namely, SEA Long
25 Beach, SEA Market, and SEA Compton. Defendant WOMACK was supervised
26 by Elizabeth Black and defendant JEFFREY. Defendant WOMACK is the
27 daughter of defendant EGANS.
28

1 The Drug Medi-Cal Program

2 10. The Medi-Cal program ("Medi-Cal") was a health care benefit
3 program, affecting commerce, that provided reimbursement for
4 medically necessary health care services to indigent persons in
5 California. Funding for Medi-Cal was shared between the federal
6 government and the State of California. Medi-Cal was administered by
7 the California Department of Health Care Services ("DHCS").

8 11. The Drug Medi-Cal program ("Drug Medi-Cal") was a program
9 within Medi-Cal that paid for medically necessary alcohol and drug
10 treatment to California's Medi-Cal eligible population. DHCS
11 administered Drug Medi-Cal by providing funds to the California
12 Department of Alcohol and Drug Programs ("ADP"), which in turn
13 utilized county alcohol and drug programs ("County ADPs"), including
14 the Los Angeles County Department of Public Health, Substance Abuse
15 Prevention and Control, to provide eligible drug treatment services.
16 The County ADPs entered into contracts with private service providers
17 such as ARS to provide treatment, recovery, and prevention services
18 for eligible patients.

19 12. Drug Medi-Cal covered outpatient substance abuse treatment
20 services only when such services were medically necessary, prescribed
21 by a physician, and provided in accordance with utilization controls
22 and regulatory requirements set forth in Title 22 of the California
23 Code of Regulations ("CCR"). Among other things, the CCR required
24 that the provider: (a) develop and use criteria and procedures for
25 the admission of beneficiaries to treatment; (b) complete a personal,
26 medical, and substance abuse history for each beneficiary upon
27 admission to treatment; and (c) complete an assessment of the
28

1 physical condition of the beneficiary within thirty (30) calendar
2 days of the admission to treatment.

3 13. Drug Medi-Cal providers were also required to have a
4 treatment plan for each beneficiary that was (a) completed and signed
5 by the primary counselor assigned to the beneficiary within 30 days
6 of the beneficiary's admission to treatment, and (b) reviewed,
7 approved, and signed by a physician within 15 days of the counselor's
8 signature. Counselors were required to review and sign updated
9 treatment plans at least every 90 days thereafter, and those updated
10 treatment plans had to be signed by a physician or psychologist
11 within 15 days of signature by the counselor.

12 14. In signing an initial treatment plan, the physician
13 confirmed that the beneficiary had an alcohol abuse or substance
14 abuse diagnosis.

15 15. To qualify for Drug Medi-Cal reimbursement, outpatient
16 group counseling had to be conducted in groups with no fewer than
17 four and no more than ten patients (only one of whom had to be a
18 Medi-Cal beneficiary). "Group counseling" meant face-to-face
19 contacts in which one or more therapists or counselors treated two or
20 more patients at the same time, focusing on the needs of the
21 individuals served. To constitute one unit of group counseling, the
22 counseling session had to last at least 90 minutes.

23 16. "Individual counseling" meant face-to-face counseling with
24 a therapist or counselor and included intake, crisis intervention,
25 collateral services (face-to-face counseling sessions with a
26 significant person in the beneficiary's life), and treatment and
27 discharge planning. To constitute one unit of individual counseling,
28 the counseling session had to last at least 50 minutes.

1 17. "Crisis intervention" meant a face-to-face contact between
2 a therapist or counselor and a beneficiary in crisis with a focus on
3 alleviating crisis problems. "Crisis" meant an actual relapse or an
4 unforeseen event or circumstance that presented an imminent threat of
5 relapse to the beneficiary. Crisis intervention services were
6 limited to stabilization of the beneficiary's emergency situation.

7 18. The "day care habilitative services" program ("DCH")
8 involved outpatient counseling and rehabilitation services provided
9 at least three hours per day, three days per week, to patients with a
10 substance abuse diagnosis, who, in general, were pregnant or had
11 recently given birth.

12 19. To receive payment for substance abuse treatment services
13 provided, Drug Medi-Cal providers submitted to the appropriate County
14 ADP claims that reported, among other things, the dates, units, and
15 types of services (e.g., group or individual counseling) provided to
16 each Medi-Cal beneficiary. ARS submitted to the County ADPs its
17 claims for payments from Drug Medi-Cal at the beginning of the next
18 month after the month in which the services for which payment was
19 claimed were purportedly provided.

20 20. To support its claims for payment, each Drug Medi-Cal
21 provider was required to establish and maintain for at least three
22 years an individual patient record for each beneficiary containing
23 the following documentation: evidence that the beneficiary met the
24 admission criteria for Drug Medi-Cal services; treatment plans;
25 progress notes; evidence that the beneficiary received counseling;
26 justification for continuing services; the discharge summary;
27 evidence of compliance with requirements for the specific treatment
28

1 service; and records substantiating the services for which claims for
2 payment were submitted.

3 21. Defendant MILLER was responsible for ensuring that ARS
4 managers and counselors conducted the ARS substance abuse treatment
5 program in accordance with Medi-Cal and Drug Medi-Cal requirements
6 and that ARS submitted to the County ADPs true and accurate claims
7 for reimbursement from Drug Medi-Cal.

8 22. ARS managers, including defendants GALAZ, MICKLO, NAVARRO,
9 JEFFREY, and EGANS, were responsible for supervising ARS counselors
10 that were assigned to them, making themselves aware of the substance
11 abuse counseling work that the counselors conducted, and ensuring
12 that the counselors conducted their substance abuse counseling work
13 for ARS in accordance with Medi-Cal and Drug Medi-Cal requirements.
14 ARS managers, therefore, were responsible for ensuring that ARS
15 counselors: enrolled in the ARS substance abuse counseling program
16 only those students that had an alcohol or substance abuse disorder
17 or addiction; conducted the group, individual, and DCH counseling
18 sessions for the appropriate amounts of time, with the appropriate
19 number of students, with the appropriate subject matter, and in the
20 appropriate confidential setting; and prepared true and accurate
21 paperwork to support the provision of counseling services.

22 B. THE SCHEME TO DEFRAUD

23 23. Beginning in or about April 2003, and continuing through
24 approximately mid-April 2013, in Los Angeles County, within the
25 Central District of California, and elsewhere, defendant MILLER,
26 together with defendant GALAZ from in or about July 2010 to in or
27 about October 2012, defendant MICKLO from in or about May 2003 to in
28 or about mid-April 2013, defendant NAVARRO from in or about September

1 2004 to in or about mid-April 2013, defendant JEFFREY from in or
2 about April 2005 to in or about mid-April 2013, defendant EGANS from
3 in or about April 2008 to in or about mid-April 2013, defendant ST.
4 JULIAN from in or about August 2006 to in or about October 2011,
5 defendant WOMACK from in or about July 2006 to in or about mid-April
6 2013, and others known and unknown to the Grand Jury, knowingly,
7 willfully, and with intent to defraud, executed and attempted to
8 execute a scheme: (a) to defraud a health care benefit program,
9 namely Medi-Cal, as to material matters in connection with the
10 delivery of and payment for health care benefits, items, and
11 services; and (b) to obtain money owned by and under the custody and
12 control of Medi-Cal by means of material false and fraudulent
13 pretenses and representations and the concealment of material facts
14 in connection with the delivery of and payment for health care
15 benefits, items, and services.

16 C. THE MANNER AND MEANS OF THE SCHEME

17 24. The fraudulent scheme operated, in substance, in the manner
18 set forth in paragraph 25 below.

19 25. Knowing that these practices contravened Drug Medi-Cal
20 requirements and would result in ARS submitting to the County ADPs
21 false claims for Drug Medi-Cal reimbursement and the creation and
22 maintenance of false paperwork to support these false claims:

23 a. ARS counselors, including defendants ST. JULIAN and
24 WOMACK:

25 i. enrolled students in the ARS substance abuse
26 treatment program even if they had used drugs or alcohol only
27 occasionally or even just once;
28

1 ii. collected student signatures on sign-in sheets
2 for group counseling sessions that the students did not in fact
3 attend or that were not in fact conducted;

4 iii. recorded times on sign-in sheets, progress notes,
5 and update logs to make it appear that the students were attending
6 group counseling sessions at different times, even if the students
7 were attending the same group counseling session;

8 iv. forged students' and others' signatures on sign-
9 in sheets and other documents related to ARS's substance abuse
10 treatment program;

11 v. prepared progress notes and update logs that
12 falsely showed that the students in the counselors' caseloads had
13 attended 90-minute group counseling sessions up to five days each
14 week, even though the students had not attended counseling sessions
15 that many days, the sessions they did attend were not 90 minutes
16 long, the sessions included more than ten students, and the sessions
17 otherwise did not meet the requirements for Drug Medi-Cal
18 reimbursement;

19 vi. prepared progress notes and update logs that
20 falsely showed that the students in the counselors' caseloads had
21 attended 50-minute individual counseling sessions that the students
22 had not attended or that otherwise did not meet the requirements for
23 Medi-Cal reimbursement;

24 vii. used the same or similar fabricated text in their
25 progress notes for different students such that it appeared that
26 different students had made the same or similar statements during
27 counseling sessions on different days or at different times;
28

1 viii. billed for two crisis intervention individual
2 counseling sessions per month for each student, even though the
3 students had not faced any actual relapses or any unforeseen events
4 or circumstances that presented an imminent threat of relapse; and

5 ix. submitted false update logs to ARS for Drug Medi-
6 Cal billing purposes and maintained false progress notes in the
7 students' files as documentation supporting those false update logs.

8 b. Defendant MILLER and ARS managers, including
9 defendants GALAZ, MICKLO, NAVARRO, JEFFREY, and EGANS, instructed
10 managers and counselors they supervised to engage in the practices
11 described in subparagraph (a) above and at times engaged in these
12 practices themselves.

13 c. Defendant MILLER, ARS managers, including defendants
14 GALAZ, MICKLO, NAVARRO, JEFFREY, and EGANS, and ARS counselors,
15 including defendants ST. JULIAN and WOMACK, submitted and caused to
16 be submitted treatment plans for students that falsely indicated that
17 the students needed substance abuse counseling, even though the
18 students' records indicated that the students had only once or
19 occasionally used alcohol or drugs or had not used alcohol or drugs
20 recently. The treatment plans indicated a diagnosis of alcohol or
21 substance abuse disorder or addiction, and by signing those treatment
22 plans, Dr. Leland Whitson, the primary ARS Medical/Clinical Director,
23 confirmed that the students had that diagnosis and needed substance
24 abuse treatment. Defendant MILLER instructed Dr. Leland Whitson not
25 to date student treatment plans and instructed ARS managers to insert
26 false dates on the treatment plans in order to ensure that the
27 treatment plans were dated in accordance with Drug Medi-Cal
28

1 regulations. ARS managers followed defendant MILLER's instructions
2 regarding dating the treatment plans.

3 d. Defendant MILLER instructed ARS managers and
4 counselors to "be creative" in their billing and "to make it happen."

5 e. Defendant MILLER warned ARS managers and counselors
6 that they would lose their jobs or have their work hours reduced if
7 they did not bill enough.

8 f. Defendants MILLER and GALAZ instructed ARS managers
9 and counselors to falsely bill for services provided at unlicensed
10 sites to make it appear as if the services had been provided at
11 licensed sites.

12 g. ARS managers, including defendants GALAZ, MICKLO,
13 NAVARRO, JEFFREY, and EGANS, passed along to ARS counselors,
14 including defendants ST. JULIAN and WOMACK, defendant MILLER's
15 instructions regarding billing, and both the managers and counselors
16 followed defendant MILLER's instructions regarding billing.

17 h. Defendant MILLER and ARS managers, including
18 defendants GALAZ, MICKLO, NAVARRO, JEFFREY, and EGANS, permitted, and
19 at times instructed, certain of the counselors they supervised to use
20 their billing codes on progress notes and update logs to falsely show
21 that defendants MILLER, GALAZ, MICKLO, NAVARRO, JEFFREY, or EGANS had
22 substituted for absent counselors and conducted 90-minute group
23 counseling sessions that they did not in fact conduct.

24 i. Defendant MILLER, ARS managers, including defendants
25 GALAZ, MICKLO, NAVARRO, JEFFREY, and EGANS, and ARS counselors,
26 including defendants ST. JULIAN and WOMACK, created and caused to be
27 created falsified update logs that were used by ARS to generate and
28 submit to the County ADPs false and fraudulent claims for substance

1 abuse treatment services that, as defendant MILLER, ARS managers,
2 including defendants GALAZ, MICKLO, NAVARRO, JEFFREY, and EGANS, and
3 ARS counselors, including defendants ST. JULIAN and WOMACK, well
4 knew, were based on falsified enrollment criteria, were supported by
5 false documentation, and did not qualify for Drug Medi-Cal
6 reimbursement.

7 j. Defendant MILLER instructed ARS managers and
8 counselors to "fix" their patient files in advance of audits of ARS,
9 knowing that the ARS managers and counselors would, among other
10 things, forge missing student signatures in those files.

11 26. As a direct and intended result of the fraudulent scheme,
12 ARS submitted to the County ADPs false and fraudulent Drug Medi-Cal
13 claims totaling approximately \$50,822,318 for counseling services,
14 and Drug Medi-Cal paid approximately \$46,970,519 on those claims.

15 D. EXECUTION OF THE SCHEME TO DEFRAUD

16 27. On or about the dates set forth below, in Los Angeles
17 County, within the Central District of California, and elsewhere, the
18 following defendants, together with others known and unknown to the
19 Grand Jury, for the purpose of executing and attempting to execute
20 the fraudulent scheme described above, knowingly and willfully
21 submitted and caused to be submitted to the County ADPs the following
22 claims for Drug Medi-Cal payments, which claims were false and
23 fraudulent in that the students identified in the claims as having
24 received the counseling for which the claims sought payment did not
25 in fact receive it, either because the purported counseling session
26 was not in fact conducted, the student represented as being present
27 was not in fact there, or the manager or counselor represented as
28 being present was not in fact there:

COUNT	DEFENDANT (S)	DATE SUBMITTED	STUDENT AND SCHOOL	CLAIM NUMBER, DATE AND TYPE OF SERVICE, AND AMOUNT BILLED
ONE	MILLER	In or about September 2010	SEA Norwalk student D.A.	A696722314: Group counseling session purportedly conducted by Erin Hoover on August 13, 2010 Billed: \$28.69
TWO	MILLER, ST. JULIAN	In or about September 2010	SEA Firestone student E.H.	A702930716: Group counseling session purportedly conducted by defendant ST. JULIAN on August 26, 2010 Billed: \$28.69
THREE	MILLER, ST. JULIAN	In or about September 2010	SEA Firestone student E.H.	A702930720: Group counseling session purportedly conducted by defendant ST. JULIAN on August 31, 2010 Billed: \$28.69
FOUR	MILLER	In or about October 2010	SEA Norwalk student D.A.	A696722648: Group counseling session purportedly conducted by Erin Hoover on September 3, 2010 Billed: \$28.69
FIVE	MILLER, ST. JULIAN	In or about October 2010	SEA Firestone student R.M.	A702930778: Group counseling session purportedly conducted by defendant ST. JULIAN on September 22, 2010 Billed: \$28.69

COUNT	DEFENDANT (S)	DATE SUBMITTED	STUDENT AND SCHOOL	CLAIM NUMBER, DATE AND TYPE OF SERVICE, AND AMOUNT BILLED
SIX	MILLER, ST. JULIAN	In or about October 2010	SEA Firestone student E.C.	A702920970: Group counseling session purportedly conducted by defendant ST. JULIAN on September 22, 2010 Billed: \$28.69
SEVEN	MILLER, NAVARRO	In or about October 2010	Harding student B.A.	A740300576: Individual counseling session purportedly conducted by defendant NAVARRO on September 23, 2010 Billed: \$67.53
EIGHT	MILLER, NAVARRO	In or about October 2010	Harding student J.L.	A740310944: Individual counseling session purportedly conducted by defendant NAVARRO on September 23, 2010 Billed: \$67.53
NINE	MILLER, GALAZ	In or about October 2010	SEA Firestone student A.A.	A702920816: Group counseling session purportedly conducted by defendant GALAZ on September 27, 2010 Billed: \$28.69

COUNT	DEFENDANT (S)	DATE SUBMITTED	STUDENT AND SCHOOL	CLAIM NUMBER, DATE AND TYPE OF SERVICE, AND AMOUNT BILLED
TEN	MILLER, GALAZ	In or about October 2010	SEA Firestone student C.M.	A702921142: Group counseling session purportedly conducted by defendant GALAZ on September 27, 2010 Billed: \$28.69
ELEVEN	MILLER, GALAZ	In or about February 2011	SEA Manchester student K.R.	A701252165: Group counseling session purportedly conducted by defendant GALAZ on January 14, 2011 Billed: \$28.69
TWELVE	MILLER, GALAZ	In or about February 2011	SEA Manchester student T.R.	A701252144: Group counseling session purportedly conducted by defendant GALAZ on January 14, 2011 Billed: \$28.69
THIRTEEN	MILLER, MICKLO	In or about February 2011	West Side student B.J.	A741302331: Group counseling session purportedly conducted by defendant MICKLO on January 26, 2011 Billed: \$28.69
FOURTEEN	MILLER, EGANS	In or about March 2011	SEA Firestone student O.A.	A702923981: Group counseling session purportedly conducted by defendant EGANS on February 14, 2011 Billed: \$28.69

COUNT	DEFENDANT (S)	DATE SUBMITTED	STUDENT AND SCHOOL	CLAIM NUMBER, DATE AND TYPE OF SERVICE, AND AMOUNT BILLED
FIFTEEN	MILLER, EGANS	In or about March 2011	SEA Firestone student M.M.	A702924246: Group counseling session purportedly conducted by defendant EGANS on February 15, 2011 Billed: \$28.69
SIXTEEN	MILLER, MICKLO	In or about March 2011	West Side student R.C.	A741302544: Group counseling session purportedly conducted by defendant MICKLO on February 28, 2011 Billed: \$28.69
SEVENTEEN	MILLER, MICKLO	In or about April 2011	West Side student A.C.	A741302887: Group counseling session purportedly conducted by defendant MICKLO on March 1, 2011 Billed: \$28.69
EIGHTEEN	MILLER, MICKLO	In or about April 2011	West Side Student A.C.	A741302890: Group counseling session purportedly conducted by defendant MICKLO on March 4, 2011 Billed: \$28.69
NINETEEN	MILLER, NAVARRO	In or about April 2011	Harding student A.N.	A740304990: Individual counseling session purportedly conducted by defendant NAVARRO on March 11, 2011 Billed: \$67.53

COUNT	DEFENDANT (S)	DATE SUBMITTED	STUDENT AND SCHOOL	CLAIM NUMBER, DATE AND TYPE OF SERVICE, AND AMOUNT BILLED
TWENTY	MILLER, JEFFREY	In or about August 2011	SEA Crenshaw student K.J.	A702530407: Group counseling session purportedly conducted by defendant JEFFREY on July 1, 2011 Billed: \$29.57
TWENTY-ONE	MILLER, JEFFREY	In or about August 2011	SEA Crenshaw student J.Y.	A702530539: Group counseling session purportedly conducted by defendant JEFFREY on July 1, 2011 Billed: \$29.57
TWENTY-TWO	MILLER	In or about September 2011	SEA Compton student L.A.	A702844379: Group counseling session purportedly conducted by Erin Hoover on August 15, 2011 Billed: \$29.57
TWENTY-THREE	MILLER	In or about September 2011	SEA Compton student L.A.	A702844380: Group counseling session purportedly conducted by Erin Hoover on August 17, 2011 Billed: \$29.57
TWENTY-FOUR	MILLER	In or about September 2011	SEA Compton student L.A.	A702844381: Group counseling session purportedly conducted by Erin Hoover on August 18, 2011 Billed: \$29.57

COUNT	DEFENDANT (S)	DATE SUBMITTED	STUDENT AND SCHOOL	CLAIM NUMBER, DATE AND TYPE OF SERVICE, AND AMOUNT BILLED
TWENTY-FIVE	MILLER, JEFFREY	In or about October 2011	SEA Compton student C.B.	A702845683: Group counseling session purportedly conducted by defendant JEFFREY on September 30, 2011 Billed: \$29.57
TWENTY-SIX	MILLER, WOMACK	In or about December 2011	SEA Compton student J.R.	A702847354: Individual counseling session purportedly conducted by defendant WOMACK on November 23, 2011 Billed: \$69.59
TWENTY-SEVEN	MILLER, NAVARRO	In or about January 2012	Harding student E.R.	A740308983: Individual counseling (crisis) session purportedly conducted by defendant NAVARRO on December 5, 2011 Billed: \$69.59
TWENTY-EIGHT	MILLER, EGANS	In or about May 2012	SEA Manchester student J.M.	A701265561: Individual counseling session purportedly conducted by defendant EGANS on April 6, 2012 Billed: \$69.59
TWENTY-NINE	MILLER, JEFFREY	In or about July 2012	SEA Girls Academy student D.W.	A702234275: Group counseling session purportedly conducted by defendant JEFFREY on June 18, 2012 Billed: \$29.57

COUNT	DEFENDANT(S)	DATE SUBMITTED	STUDENT AND SCHOOL	CLAIM NUMBER, DATE AND TYPE OF SERVICE, AND AMOUNT BILLED
THIRTY	MILLER, WOMACK	In or about March 2013	SEA Compton student E.G.	A702856430: Group counseling session purportedly conducted by defendant WOMACK on February 13, 2013 Billed: \$30.28
THIRTY- ONE	MILLER, WOMACK	In or about April 2013	SEA Compton student A.O.	A702857643: Group counseling session purportedly conducted by defendant WOMACK on March 1, 2013 Billed: \$30.28
THIRTY- TWO	MILLER, WOMACK	In or about April 2013	SEA Compton student F.W.	A702857935: Group counseling session purportedly conducted by defendant WOMACK on March 4, 2013 Billed: \$30.28

COUNTS THIRTY-THREE THROUGH FORTY

[18 U.S.C. §§ 1028A(a)(1), 2(b)]

28. The Grand Jury hereby re-alleges and incorporates by reference paragraphs 1 through 22 and 24 through 26 of this Indictment as though set forth in their entirety herein.

29. On or about the dates set forth below, in Los Angeles County, within the Central District of California, the following defendants, together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, and willfully caused to be transferred, possessed, and used, without lawful authority, means of identification of other persons, namely, the names and Medi-Cal numbers of the students identified below, during and in relation to felony violations of Title 18, United States Code, Section 1347, as charged in the related counts of the Indictment identified below:

COUNT	DEFENDANT(S)	DATE	STUDENT AND SCHOOL	RELATED COUNT OF INDICTMENT
THIRTY-THREE	MILLER	From September 3, 2010 to in or about October 2010	SEA Norwalk student D.A.	Count Four
THIRTY-FOUR	ST. JULIAN	From September 22, 2010 to in or about October 2010	SEA Firestone student R.M.	Count Five
THIRTY-FIVE	MILLER, GALAZ	From September 27, 2010 to in or about October 2010	SEA Firestone student A.A.	Count Nine

COUNT	DEFENDANT (S)	DATE	STUDENT AND SCHOOL	RELATED COUNT OF INDICTMENT
THIRTY-SIX	EGANS	From February 15, 2011 to in or about March 2011	SEA Firestone student M.M.	Count Fifteen
THIRTY-SEVEN	MICKLO	From February 28, 2011 to in or about March 2011	West Side student R.C.	Count Sixteen
THIRTY-EIGHT	NAVARRO	From March 11, 2011 to in or about April 2011	Harding student A.N.	Count Nineteen
THIRTY-NINE	JEFFREY	From July 1, 2011 to in or about August 2011	SEA Crenshaw student K.J.	Count Twenty

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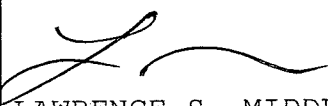
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COUNT	DEFENDANT (S)	DATE	STUDENT AND SCHOOL	RELATED COUNT OF INDICTMENT
FORTY	WOMACK	From November 23, 2011 to in or about December 2011	SEA Compton student J.R.	Count Twenty-Six

A TRUE BILL

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Foreperson

EILEEN M. DECKER
United States Attorney


LAWRENCE S. MIDDLETON
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