

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

-FILED-

JUN 20 2018

At _____ M
ROBERT N. TRGOVICH, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA)
)
V.)
)
FELICIA BLOUNT and CHARLOTTE)
HUNTER)

Case No.

18 U.S.C § 1347

2 • 18 CR 64

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At times material to this indictment:

1. Medicaid was a joint federal-state program administered by the states under federal guidance. The Indiana Medicaid Program provided medical care to eligible individuals, including disabled and indigent families with dependent children.

2. Indiana Medicaid required individuals and businesses seeking to provide services through Indiana Medicaid to enroll in the program as providers.

3. Enrolled providers had to abide by the rules and regulations, policies and procedures governing reimbursement for the services they supplied to Medicaid recipients.

4. Providers who enrolled in the Indiana Medicaid program could only submit claims for medically and reasonably necessary services that are covered and actually rendered to Medicaid recipients under the program.

5. Indiana Medicaid provided direct payment to enrolled service providers. The federal government reimbursed the State of Indiana approximately two-thirds of each payment.

6. Indiana Medicaid paid authorized providers to transport Medicaid recipients to and from medical services. The rules and regulations regarding transportation service providers were set out in the Indiana Health Coverage Provider Manual and on the State of Indiana's Medicaid provider website.

7. Indiana Medicaid paid approximately \$10.00 for ambulatory (a rider who can walk) medical service transportation of ten miles or less. Indiana Medicaid paid approximately \$20 for round-trip medical service transportation. In instances where the medical service transportation exceeded ten miles, Indiana Medicaid paid mileage.

8. Indiana Medicaid providers must document mileage on the driver's ticket using odometer readings or mapping software programs.

9. From January 2013 through January 2014 Indiana Medicaid paid \$1.13 per mile for mileage over ten miles. From January 2014 through January 2015, Indiana Medicaid increased its mileage reimbursement to \$1.25 per mile.

10. Indiana Medicaid was a health benefit program as defined under Title 18, United States Code, §24(b).

11. Felicia Blount owned and operated Lending a Helping Hand Transportation (LHHT) located in Gary, Indiana. LHHT was an Indiana Medicaid provider.

12. Felicia Blount along with Charlotte Hunter did the Medicaid billing for LHHT.

COUNTS 1 THROUGH NINETEEN
(Health Care Fraud Scheme)

13. From approximately January 2013 continuing through to in or about January 2016, in the Northern District of Indiana, the defendants,

FELICIA BLOUNT and CHARLOTTE HUNTER,

in connection with the delivery of and payment for health care related services to seventeen Indiana Medicaid beneficiaries, did knowingly and willfully execute a scheme and artifice to defraud the Indiana Medicaid program and to obtain, by means of materially false and fraudulent pretenses, and representations, over one hundred thousand dollars under the custody and control of Indiana Medicaid.

MANNER AND MEANS BY WHICH THE SCHEME OPERATED

14. It was part of the health care fraud scheme that Felicia Blount and Charlotte Hunter routinely submitted claims for payment on behalf of LHHT that inflated the mileage by approximately 100 miles a trip for medical transportation provided to Indiana Medicaid beneficiaries traveling between Northwest Indiana and Indianapolis.

15. It was further part of the health care fraud scheme that Felicia Blount and Charlotte Hunter submitted claims for mileage payment on behalf of LHHT for services not actually rendered.

ACTS OF HEALTH CARE FRAUD

16. On or about the dates listed below, in the Northern District of Indiana, and elsewhere, the defendants,

FELICIA BLOUNT and CHARLOTTE HUNTER

in connection with payments for health benefit services did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice to defraud a health benefit program, specifically, Indiana Medicaid, and to obtain, by means of materially false and fraudulent pretenses and representations, money owned by and under the custody and control of said health care benefit program, through the submission of false and fraudulent claims seeking the identified dollar amounts in excess of what LHT was entitled to receive as reimbursement for medical transportation of Indiana Medicaid beneficiaries:

Count	Beneficiary	Claim No.	Claim Date	Loss Amount
1	DA	4013164028581	06/13/13	\$435.05
2	GC	4013221048321	08/09/13	\$429.40
3	TD	4014056011291	02/25/14	\$481.25
4	LB	4015226033605	08/14/2015	\$481.25
5	LB	4016019066844	01/19/16	\$481.25
6	JB	4015327014592	11/23/2015	\$481.25
7	JB	4016021054588	01/21/2016	\$481.25
8	KH	4015170008183	06/19/2015	\$481.25

9	SJ	4013179015825	06/28/2013	\$435.05
10	EL	4015328019006	11/24/2015	\$481.25
11	VM	4013206038406	07/25/2013	\$429.40
12	KM	4014184060577	07/03/2014	\$475.00
13	DR	4016028065263	01/28/2016	\$481.25
14	PR	4014357081778	12/23/2014	\$481.25
15	SS	4015230093544	08/18/2015	\$481.25
16	TW	4014119086128	04/29/14	\$475.00
17	CW	4015156013614	06/05/2015	\$481.25
18	KH	4015156013469	06/05/2015	\$481.25
19	CJ	4014119114812	04/29/2014	\$481.25

All in violation of Title 18, United States Code, Section 1347.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 19 of this indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(7).

2. Upon conviction of any of the Counts 1 through 19 of this indictment and pursuant to Title 18, United States Code, Section 982(a)(7) defendants FELICIA BLOUNT and CHARLOTTE HUNTER, shall forfeit to the United States of America, any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to 18 United State Code, Section 982(a)(7) and 28 United States Code, Section 2461(c).

A TRUE BILL

/s/ FOREPERSON
FOREPERSON

APPROVED:

THOMAS L. KIRSCH II
UNITED STATES ATTORNEY

BY: /s/ Diane L. Berkowitz
Diane L. Berkowitz
Assistant United States Attorney