

SUPPRESSED

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF MISSOURI
 EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No.
)
 DAWN RHODES-HICKS,)
)
)
 Defendant.)

FILED
 JUL - 5 2017
 U.S. DISTRICT COURT
 EASTERN DISTRICT OF MO
 ST. LOUIS

4:17CR300 HEA/JMB

INDICTMENT

The Grand Jury charges that:

COUNTS 1-4
False Statements Involving
Health Care Benefit Plan
Title 18, United States Code, Section 1035(a)(1) and Section 2

On or about the dates indicated below, in the Eastern District of Missouri,

DAWN RHODES-HICKS,

the defendant herein, in a matter involving a health care benefit program, knowingly and willfully made and used, and caused to be made and used, materially false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries in connection with the delivery of and payment for health care benefits, items, and services, in that the defendants submitted and caused to be submitted to Medicare false reimbursement claims for the following patients.

Count	Patient	Date of Service	Date of Claim	Paid Amount	Facility
1	R.K.	2/27/2013	5/17/2013	\$32.95	NHC-Maryland Heights
2	R.K.	5/1/2013	5/17/2013	\$128.51	NHC- Maryland Heights
3	A.B.	3/7/2013	5/17/2013	\$23.67	Levering

Count	Patient	Date of Service	Date of Claim	Paid Amount	Facility
4	C.M.	5/15/2013	5/31/2013	\$127.86	Levering

The Grand Jury further charges that:

FORFEITURE ALLEGATION

The Grand Jury further finds probable cause that:

1. Pursuant to Title 18, United States Code, Section 982(a)(7), upon conviction of an offense in violation of Title 18, United States Code, Section 1035 or 1347 or a conspiracy to commit such offense as set forth in Count 1, the defendant shall forfeit to the United States any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense or conspiracy.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

A TRUE BILL.

FOREPERSON

CARRIE COSTANTIN
Acting United States Attorney

Gwendolyn E. Carroll
Assistant United States Attorney