

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 15-61
VERSUS	*	SECTION: "E"
ELESHIA WILLIAMS	*	

\* \* \*

**FACTUAL BASIS**



If this matter were to proceed to trial, the Government would prove the following facts through competent evidence:

1. Lisa Crinel, the owner of Abide Home Care Services, Inc. (Abide), and other Abide employees would testify that employees of Abide had to attend mandatory monthly meetings and had to sign for their paychecks. Federal Bureau of Investigation Special Agent Krista Bradford would testify that she retrieved payroll sign-in sheets from January 13, 2011, through January 15, 2014, in the execution of a search warrant of Abide and found no signatures from **ELESHIA WILLIAMS (WILLIAMS)**<sup>1</sup>. Agent Bradford would also testify that she retrieved sign-in sheets from the mandatory meetings and found none signed by **WILLIAMS**.<sup>2</sup> Agent Bradford would testify about personnel lists and organizational charts found in the Abide search warrant none of which include **WILLIAMS** as personnel of Abide.

2. Crinel would also testify that Abide employed salaried marketers who regularly attended employee meetings, signed for their paychecks, and used electronic tablets to track their

<sup>1</sup> Bates Nos. 303397 – 303407 (1B171), and 1B172 (un-Bated).

<sup>2</sup> Bates 291845 – 291846 (1B88); 1B85 (un-Bated).

Initials:  
PHS:   
RCJ:   
EW: \_\_\_\_\_

marketing activities. The employee marketers routinely used Abide-produced marketing materials in their visits with Medicare providers in an effort to earn business on behalf of Abide.

3. Crinel would testify that she paid **WILLIAMS** kickbacks for patient referrals. Crinel would testify that **WILLIAMS** was not an employee of Abide. **WILLIAMS'** checks were placed with the receptionist for **WILLIAMS** to pick up; **WILLIAMS** did not sign for her check as Abide employees did. **WILLIAMS** routinely contacted Crinel before and after she referred patients to Abide to make sure they were admitted so that **WILLIAMS** would be paid. Crinel would testify that she tracked the patient referrals for **WILLIAMS** and others.

4. Agent Krista Bradford would testify about records she obtained from Jonathan Nora's office at Abide which would show that Nora, for Abide, tracked the patient referrals brought in from different Abide referral sources.<sup>3</sup> Records would indicate that **WILLIAMS** was credited for bringing in eighteen (18) patients for February 9, 2011, thirteen (13) patients for April 19, 2011, three (3) patients each for June 2, 2011, and July 1, 2011, four (4) for August 1, 2011, two (2) patients for February 1, 2012, six (6) patients for February 8, 2012, two (2) for April 2, 2012, and one (1) for November 6, 2012.

5. The banking account records of Abide would be introduced to show that the following payments were made to **WILLIAMS** from April 10, 2008, through February 21, 2014:

Date	Abide Acct. #	Check Amount	Check #
04/10/08	2081247911	\$500.00	
11/14/08	2081247903	\$500.00	
12/09/08	2081247903	\$1,000.00	31747
12/12/08	2081247903	\$500.00	31757
03/13/09	2081247903	\$500.00	31940
03/23/09	2081247903	\$1,000.00	31952
03/25/09	2081247903	\$1,000.00	31980
04/03/09	2081247903	\$500.00	31998

<sup>3</sup> Bates Nos. 195902-196916.

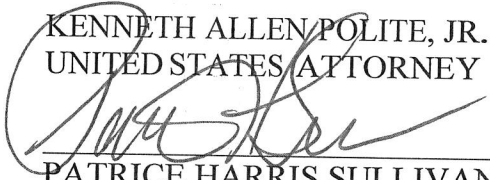
Date	Abide Acct. #	Check Amount	Check #
04/24/09	2081247903	\$1,000.00	32077
05/14/09	2044507113	\$500.00	418
06/04/09	2081247903	\$500.00	32240
02/05/10	2081247903	\$500.00	32918
03/26/10	2081247903	\$500.00	33056
04/07/10	2081247903	\$500.00	33085
11/08/10	2081247903	\$1,814.42	33693
11/19/10	2081247911	\$3,500.00	40662
12/17/10	2081247911	\$5,079.25	40675
12/31/10	2081247911	\$2,308.75	40677
01/28/11	2081247911	\$3,774.00	5413
02/24/11	2081247911	\$2,358.75	5537
03/29/11	2081247911	\$471.75	5682
04/22/11	2081247911	\$2,830.50	5824
05/19/11	2081247911	\$1,415.25	5964
07/01/11	2081247911	\$1,887.00	6181
07/29/11	2081247911	\$1,887.00	6339
08/29/11	2081247911	\$943.50	6486
09/28/11	2081247911	\$943.50	40739
10/21/11	2081247911	\$1,415.25	6801
11/17/11	2081247911	\$1,887.00	6988
12/19/11	2081247911	\$2,100.00	41003
12/19/11	2081247911	\$1,400.00	41007
02/01/12	2081247911	\$377.40	41061
08/06/12	2081247903	\$400.00	35290
11/19/12	2044507113	\$400.00	1237
10/01/13	110048844	\$1,775.97	153
10/16/13	110048844	\$1,775.97	180
11/04/13	110048844	\$1,775.97	245
11/18/13	110048844	\$1,775.97	309
02/21/14	110048844	\$369.40	710
Total		\$53,666.60	

6. Crinel would testify that Abide Check No. 40662 dated November 19, 2010, in the amount of \$3,500, Check No. 40675 dated December 17, 2010, in the amount \$5,079.25, and Check No. 40677 dated December 31, 2010, in the amount of \$2,308.75, all made payable to **WILLIAMS** and cashed by **WILLIAMS**, each represents a payment for patient referrals. Crinel would also identify check number 40739 dated September 21, 2011, in the amount of \$943.50 from

Abide's Capital One Account No. 7911, payable to **WILLIAMS**, and testify that the check was a kickback paid to **WILLIAMS** in return for referring two patients to Abide.

7. Sylvia Walker would testify that she was an office manager at Abide from August 2013, through the date of the search warrant, and observed that **WILLIAMS** sent referrals and faxed patient demographics to Abide from physicians' offices. Walker would testify that **WILLIAMS** was paid intermittently, depending on her referral volume. Walker would testify that **WILLIAMS** was not an employee at Abide.

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY

  
PATRICE HARRIS SULLIVAN  
Assistant United States Attorney

\_\_\_\_\_  
ELESHIA WILLIAMS

Defendant

Date: \_\_\_\_\_

\_\_\_\_\_  
ROBERT C. JENKINS

Counsel for Defendant

Date: \_\_\_\_\_