

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO: 26-
v.	:	DATE FILED:
DONNA ROMSTEADT	:	VIOLATIONS:
ALYSSA CUCULINO	:	18 U.S.C. § 1349 (conspiracy to commit
LOUISE ISRAEL	:	health care fraud – 1 count)
ELEXIS CUCULINO	:	18 U.S.C. § 1347 (health care fraud –
	:	8 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Medicaid was a health care benefit program jointly funded by the federal and state governments. Medicaid was overseen by the Centers for Medicare and Medicaid Services (“CMS”), an agency of the United States Department of Health and Human Services (“HHS”). In Pennsylvania, Medicaid, also known as “Medical Assistance,” was also overseen by the Pennsylvania Department of Human Services (“DHS”). A person covered by Medicaid was referred to as a recipient, a consumer, or a beneficiary.

2. CMS allowed states to apply for various Home and Community-Based Services (“HCBS”) waiver programs authorized in Section 1915(c) of the Social Security Act. HCBS waiver programs permitted a state to furnish an array of home and community-based services that would assist Medicaid beneficiaries to live in the community and avoid institutionalization. CMS allowed states latitude to design a HCBS waiver program that addressed the specific needs and goals of the state.

3. Pennsylvania designed and received CMS approval for an HCBS waiver program called Community HealthChoices (“CHC”). CHC allowed Medicaid to pay for, among other things, home and community-based personal assistance services for those recipients who otherwise would need to live in a nursing home because of disability. CHC required Medicaid recipients to enroll with a managed care organization (“CHC MCO”) to receive long-term services and supports, including personal assistance services, and physical health services, such as obtaining medical care and treatment.

4. Each CHC MCO, including CHC MCO #1 and CHC MCO #2, known to the grand jury, were themselves health care benefit programs, in that they were public or private plans or contracts, affecting commerce, under which medical benefits, items, and services were provided to individuals.

5. Personal assistance services, also called personal care services, were aimed at helping the recipient to complete tasks of daily living that would have been performed independently if the recipient had no disability, including eating, bathing, toileting, transferring, and personal hygiene. The personal assistance services also included services related to the recipient’s medical condition, such as transporting the recipient to and coordinating doctors’ appointments and obtaining emergency medical assistance when needed. For Medicaid recipients who could only live outside of an institutional setting with assistance performing activities of daily living, a personal care assistance worker (“PCA”) was assigned to provide personal care services paid for by Medicaid.

6. One way to receive personal assistance services was to become a client of a home care agency (“Agency”). The recipient could choose an Agency and could also change to

a new Agency at any time. The Agency employed PCAs to supply the personal assistance services for which the recipient had been approved.

7. A recipient could request that an Agency assign a PCA, or alternatively a person of the recipient's choice could seek employment with an Agency in order to provide the services to the recipient. PCAs were not medical professionals and did not require specialized medical training to provide the services. However, PCAs were required to go through a hiring and onboarding process when hired by an Agency.

8. The Agency was responsible for keeping records of all dates and times on which a PCA provided services to a recipient. Personal assistance services were billed by the Agency to the CHC MCO in 15-minute increments or units based on the PCA's reported hours, and the Agency then paid the PCA an hourly rate.

9. The CHC required use of Electronic Visit Verification ("EVV") for personal assistance services. EVV was a technology solution that electronically verified the delivery dates and times of home and community-based services to the recipients of those services. The EVV system captured the following data:

- a. Type of service performed;
- b. Individual receiving the service;
- c. Date of service;
- d. Location of service delivery, if completed by computer or mobile device;
- e. Individual providing the service; and
- f. Time the service began and ended.

42 U.S.C. § 1396b(l)(5)(A).

10. Pennsylvania required EVV for billing personal care services. Paper timesheets could serve as a backup for times when EVV was not possible for technical reasons. A PCA was responsible for clocking in and clocking out for each shift using EVV.

11. EVV was performed over telephone lines or via computer or mobile device application, and corrections or edits could be made through a web-based portal. In Pennsylvania, an Agency's EVV data was electronically transmitted to computer servers operated or controlled by a third-party vendor for the CHC MCOs. An Agency typically submitted claims through a vendor. Prior to paying a claim, the CHC MCO compared the claim to the EVV data.

12. Each CHC MCO received Medicaid funds based on the number of recipients enrolled with that CHC MCO, and each CHC MCO was responsible for paying claims, including claims for personal assistance services submitted by an Agency.

13. Agency #1, known to the grand jury, was a licensed Agency that employed PCAs. Agency #1 was an entity providing personal care services for which payment was made under health care benefit programs, including CHC MCO #1 and CHC MCO #2.

14. Defendant ALYSSA CUCULINO was a PCA who was employed by, and purported to render services through, Agency #1.

15. Defendant LOUISE ISRAEL was a PCA who was employed by, and purported to render services through, Agency #1.

16. Defendant DONNA ROMSTEADT was a Medicaid recipient who was enrolled in CHC and received medical benefits, items, and services from Medicaid via CHC MCO #1. Defendant ROMSTEADT retained Agency #1 to provide purportedly necessary personal assistance services.

17. Defendant ELEXIS CUCULINO was a Medicaid recipient who was enrolled in CHC and received medical benefits, items, and services from Medicaid via CHC MCO #2. Defendant ELEXIS CUCULINO retained Agency #1 to provide purportedly necessary personal assistance services.

18. Defendant ELEXIS CUCULINO was previously married to a brother of defendant DONNA ROMSTEADT. Defendant ELEXIS CUCULINO is the mother of defendant ALYSSA CUCULINO. Defendant ALYSSA CUCULINO is the niece of defendant ROMSTEADT.

19. Recipient #1, known to the grand jury, was a Medicaid recipient who was enrolled in CHC and received medical benefits, items, and services from Medicaid via CHC MCO #1. Recipient #1 retained Agency #1 to provide purportedly necessary personal assistance services.

20. Recipient #1 resided with defendant DONNA ROMSTEADT and is the father of defendant LOUISE ISRAEL, brother of defendant ROMSTEADT, and former brother-in-law of defendant ELEXIS CUCULINO.

21. Defendant LOUISE ISRAEL purported to provide personal assistance services to Recipient #1 from in or about April 2021 through in or about August 2023, and again from in or about July 2025 through in or about July 2026. Defendant ISRAEL purported to provide personal assistance services to defendant DONNA ROMSTEADT from in or about April 2024 through in or about July 2026. Defendant ISRAEL was employed and paid by Agency #1 to provide such services to Recipient #1 and defendant ROMSTEADT.

22. Defendant ALYSSA CUCULINO purported to provide personal assistance services to Recipient #1 from in or about September 2023 through in or about July

2025. Defendant ALYSSA CUCULINO purported to provide personal assistance services to defendant ELEXIS CUCULINO from in or about March 2024 through in or about July 2025. Defendant ALYSSA CUCULINO was employed and paid by Agency #1 to provide such services to Recipient #1 and defendant ELEXIS CUCULINO.

23. Agency #1 billed CHC MCO #1 and received money from CHC MCO #1 for the personal assistance services purportedly rendered by its employees, including services purportedly rendered by defendants LOUISE ISRAEL and ALYSSA CUCULINO to defendant DONNA ROMSTEADT and Recipient #1, based on the entries in the EVV system.

24. Agency #1 billed CHC MCO #2 and received money from CHC MCO #2 for the personal assistance services purportedly rendered by its employees, including services purportedly rendered by defendant ALYSSA CUCULINO to defendant ELEXIS CUCULINO, based on the entries in the EVV system.

25. From in or about April 2021 through at least in or about July 2026, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DONNA ROMSTEADT,
ALYSSA CUCULINO,
LOUISE ISRAEL, and
ELEXIS CUCULINO**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and willfully execute a scheme and artifice to defraud one or more health care benefit programs, specifically, Medicaid, CHC MCO #1, and CHC MCO #2, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, Medicaid, CHC MCO #1, and CHC MCO #2, in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347.

MANNER AND MEANS

It was part of the conspiracy that:

26. Defendants ALYSSA CUCULINO and LOUISE ISRAEL were employed by Agency #1 and purported to provide personal assistance services as PCAs to Recipient #1 and to defendants DONNA ROMSTEADT and ELEXIS CUCULINO. In particular, defendant ALYSSA CUCULINO purported to provide such services to defendant ELEXIS CUCULINO and Recipient #1, and defendant ISRAEL purported to provide such services to defendant ROMSTEADT and Recipient #1.

27. Defendants ALYSSA CUCULINO and LOUISE ISRAEL falsely represented, and caused to be falsely represented, entries in the EVV system purporting that they provided personal assistance services to Recipient #1 and to defendants DONNA ROMSTEADT and ELEXIS CUCULINO, knowing and intending that such false representations would result in the submission of false and fraudulent claims by Agency #1 to Medicaid, CHC MCO #1, and CHC MCO #2.

28. Defendants ALYSSA CUCULINO and LOUISE ISRAEL made those false representations by performing, and causing to be performed, false and fraudulent clock-ins and clock-outs, generally through EVV, for personal assistance services that they allegedly rendered and provided to Recipient #1 and to defendants DONNA ROMSTEADT and ELEXIS CUCULINO.

29. Despite purporting to provide personal assistance services to Recipient #1 and to defendants DONNA ROMSTEADT and ELEXIS CUCULINO, and being paid for such services by Agency #1, defendants ALYSSA CUCULINO and LOUISE ISRAEL were, as to

many of the days and hours included in the false representations, engaged in other activities and not the care services they purported to be providing.

30. Defendants DONNA ROMSTEADT and ELEXIS CUCULINO on some occasions falsely clocked in and clocked out via EVV on behalf of defendants ALYSSA CUCULINO and LOUISE ISRAEL, purporting to show that defendants ALYSSA CUCULINO and ISRAEL were at the respective beneficiaries' residences at the scheduled times.

31. Based upon these false EVV entries, defendants DONNA ROMSTEADT, ALYSSA CUCULINO, LOUISE ISRAEL, and ELEXIS CUCULINO caused Agency #1 to submit false and fraudulent claims to CHC MCO #1 and CHC MCO #2 for those services. CHC MCO #1 and CHC MCO #2 paid Agency #1 based upon the claims, and Agency #1 then in turn paid defendants ALYSSA CUCULINO and ISRAEL an hourly rate for the purported services based upon the hours that were logged.

ALYSSA CUCULINO

32. Despite purporting to provide personal assistance services, defendant ALYSSA CUCULINO worked another job or was otherwise unavailable while she was purportedly providing care services to Recipient #1 and defendant ELEXIS CUCULINO.

33. Specifically, between on or about September 8, 2023, and on or about December 1, 2023, defendant ALYSSA CUCULINO was employed by Company #1, a hospitality vendor at a Philadelphia stadium, and her work shifts at Company #1 coincided with the times during which she purported to provide personal care services to Recipient #1.

34. While defendant ALYSSA CUCULINO was at the stadium, defendants ALYSSA CUCULINO and DONNA ROMSTEADT caused false EVV clock-ins to originate from Recipient #1's address, which was shared with defendant ROMSTEADT, purporting to

show that defendant ALYSSA CUCULINO was at Recipient #1's residence and providing care to Recipient #1 at the scheduled time. Defendant ALYSSA CUCULINO was not actually providing personal assistance services to Recipient #1 at that time. Defendants ALYSSA CUCULINO and ROMSTEADT therefore caused false claims to be submitted based upon these false representations, and Agency #1 paid defendant ALYSSA CUCULINO based upon those false representations.

35. Defendant ALYSSA CUCULINO also purported to render care when she was hospitalized. While defendant ALYSSA CUCULINO was hospitalized, defendants ALYSSA CUCULINO and DONNA ROMSTEADT caused false EVV clock-ins and clock-outs to originate from Recipient #1's address that was shared with defendant ROMSTEADT, purporting to show that defendant ALYSSA CUCULINO was at Recipient #1's residence and providing care at the scheduled time. Similarly, during defendant ALYSSA CUCULINO's hospitalization, defendants ALYSSA CUCULINO and ELEXIS CUCULINO caused false EVV clock-ins and clock-outs to originate from defendant ELEXIS CUCULINO's residence, purporting to show that defendant ALYSSA CUCULINO was at defendant ELEXIS CUCULINO's residence and providing care at the scheduled time, even though defendant ALYSSA CUCULINO was not present at her home and was in the hospital.

36. Defendant ALYSSA CUCULINO also purported to provide care to defendant ELEXIS CUCULINO through false EVV clock-ins and clock-outs when defendant ELEXIS CUCULINO was engaged in other activities separate and apart from defendant ALYSSA CUCULINO.

LOUISE ISRAEL

37. Despite purporting to provide personal assistance services to both Recipient #1 and defendant DONNA ROMSTEADT through false EVV clock-ins and clock-outs, defendant LOUISE ISRAEL was at times incarcerated while she was purportedly providing such care services. Defendants ROMSTEADT and ISRAEL therefore caused false claims to be submitted based upon these false representations, and Agency #1 paid defendant ISRAEL based upon those false representations.

38. On other dates when services were purportedly performed, defendant LOUISE ISRAEL was otherwise unavailable and was located in various areas of Pennsylvania while purported care recipient defendant DONNA ROMSTEADT was in South Philadelphia.

39. Nonetheless, defendants LOUISE ISRAEL and DONNA ROMSTEADT caused false EVV clock-ins and clock-outs to originate from defendant DONNA ROMSTEADT's address purporting to show that defendant ISRAEL was at defendant ROMSTEADT's residence and providing care at the scheduled time. Defendant ISRAEL was not actually providing personal assistance services to defendant ROMSTEADT. Defendants ISRAEL and ROMSTEADT therefore caused false claims to be submitted based upon these false representations, and Agency #1 paid defendant ISRAEL based upon those false representations.

* * *

40. By performing and causing to be performed false EVV entries, defendants DONNA ROMSTEADT, ALYSSA CUCULINO, LOUISE ISRAEL, and ELEXIS CUCULINO caused Agency #1 to submit false and fraudulent claims to CHC MCO #1 and CHC MCO #2 for those services purportedly rendered by defendants ALYSSA CUCULINO and ISRAEL to

Recipient #1 and to defendants ROMSTEADT and ELEXIS CUCULINO, when in truth and in fact, and as the defendants well knew, the care had not been rendered. In turn, Agency #1 paid defendants ALYSSA CUCULINO and ISRAEL an hourly rate for the purported services based upon the hours that were logged.

41. Defendants LOUISE ISRAEL and ALYSSA CUCULINO in many instances shared the proceeds from Agency #1 with defendants DONNA ROMSTEADT and ELEXIS CUCULINO.

42. In total, defendants DONNA ROMSTEADT, ALYSSA CUCULINO, and LOUISE ISRAEL caused Agency #1 to bill CHC MCO #1, and CHC MCO #1 to pay Agency #1 for personal care services purportedly provided to Recipient #1 and to defendant ROMSTEADT by defendants ALYSSA CUCULINO and LOUISE ISRAEL, at least approximately \$352,921.

43. In total, defendants ALYSSA CUCULINO and ELEXIS CUCULINO caused Agency #1 to bill CHC MCO #2, and CHC MCO #2 to pay Agency #1 for personal care service purportedly provided to defendant ELEXIS CUCULINO by defendant ALYSSA CUCULINO, at least approximately \$91,572.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and to accomplish its object, defendants, and others known and unknown to the grand jury, committed the following acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 15, 2022, defendant LOUISE ISRAEL was incarcerated in Philadelphia while she purported to provide personal care services to Recipient #1. While defendant ISRAEL was incarcerated, defendants ISRAEL and DONNA ROMSTEADT caused a false EVV clock-in and clock-out to originate from a phone number associated with Recipient

#1, purporting to show that defendant ISRAEL was at Recipient #1's residence and providing care at the scheduled time.

2. On or about June 25, 2022, defendant LOUISE ISRAEL was still incarcerated in Philadelphia while she purported to provide personal care services to Recipient #1. While defendant ISRAEL was incarcerated, defendants ISRAEL and DONNA ROMSTEADT caused a false EVV clock-in and clock-out to originate from a phone number associated with Recipient #1, purporting to show that defendant ISRAEL was at Recipient #1's residence and providing care at the scheduled time.

3. On or about September 27, 2023, defendant ALYSSA CUCULINO worked a shift for Company #1 at the Philadelphia stadium. While defendant ALYSSA CUCULINO was employed at the stadium, defendants ALYSSA CUCULINO and DONNA ROMSTEADT caused a false EVV clock-in to originate from Recipient #1's address, which was shared with defendant ROMSTEADT, purporting to show that defendant ALYSSA CUCULINO was at Recipient #1's residence and providing care to Recipient #1 at the scheduled time.

4. On or about October 20, 2023, defendant ALYSSA CUCULINO worked a shift for Company #1 at the Philadelphia stadium. While defendant ALYSSA CUCULINO was employed at the stadium, defendants ALYSSA CUCULINO and DONNA ROMSTEADT caused a false EVV clock-in to originate from Recipient #1's address, which was shared with defendant ROMSTEADT, purporting to show that defendant ALYSSA CUCULINO was at Recipient #1's residence and providing care to Recipient #1 at the scheduled time.

5. On or about August 27, 2024, defendants ALYSSA CUCULINO and ELEXIS CUCULINO submitted or caused the submission of a false EVV clock-in and clock-out purporting to provide personal assistance services to defendant ELEXIS CUCULINO. During

ALYSSA CUCULINO's purported PCA shift, defendant ELEXIS CUCULINO was engaged in meetings in Cherry Hill, New Jersey, outside of the presence of defendant ALYSSA CUCULINO.

6. On or about October 7, 2024, while defendant ALYSSA CUCULINO was hospitalized, defendants ALYSSA CUCULINO and ELEXIS CUCULINO caused a false EVV clock-in and clock-out to originate from defendant ELEXIS CUCULINO's residence purporting to show that defendant ALYSSA CUCULINO was at defendant ELEXIS CUCULINO's residence and providing care to defendant ELEXIS CUCULINO.

7. On or about October 7, 2024, while defendant ALYSSA CUCULINO was hospitalized, defendants ALYSSA CUCULINO and DONNA ROMSTEADT caused a false EVV clock-in and clock-out to originate from Recipient #1's residence, which was shared with defendant ROMSTEADT, purporting to show that defendant ALYSSA CUCULINO was at Recipient #1's residence and providing care to Recipient #1.

8. On or about October 24, 2024, while defendant LOUISE ISRAEL was in North Philadelphia and Chester, Pennsylvania, defendants ISRAEL and DONNA ROMSTEADT caused a false EVV clock-in and clock-out to originate from Recipient #1's residence, which was shared with defendant ROMSTEADT, purporting to show that defendant ISRAEL was at Recipient #1's residence in South Philadelphia and providing care to Recipient #1.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH NINE**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1 through 24, 26 through 43, and Acts in Furtherance of the Conspiracy paragraphs 1 through 8 of Count One are incorporated here.
2. On or about the dates listed below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DONNA ROMSTEADT,
ALYSSA CUCULINO,
LOUISE ISRAEL, and
ELEXIS CUCULINO**

knowingly and willfully executed, and aided and abetted the execution of, a scheme and artifice to defraud one or more health care benefit programs, specifically, Medicaid, CHC MCO #1, and CHC MCO #2, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, Medicaid, CHC MCO #1, and CHC MCO #2, in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347, each count constituting a separate offense:

Count	Defendants	Approx. Purported Date of Service	Approx. Amount
2	DONNA ROMSTEADT ALYSSA CUCULINO	September 27, 2023	\$129.12
3	DONNA ROMSTEADT ALYSSA CUCULINO	October 20, 2023	\$129.12
4	DONNA ROMSTEADT ALYSSA CUCULINO	October 7, 2024	\$129.12
5	ELEXIS CUCULINO ALYSSA CUCULINO	October 7, 2024	\$215.20
6	ELEXIS CUCULINO ALYSSA CUCULINO	August 27, 2024	\$215.20

Count	Defendants	Approx. Purported Date of Service	Approx. Amount
7	DONNA ROMSTEADT LOUISE ISRAEL	June 15, 2022	\$131.52
8	DONNA ROMSTEADT LOUISE ISRAEL	June 25, 2022	\$131.52
9	DONNA ROMSTEADT LOUISE ISRAEL	October 24, 2024	\$172.16

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1347 and 1349, set forth in this indictment, defendants

**DONNA ROMSTEADT,
ALYSSA CUCULINO,
LOUISE ISRAEL, and
ELEXIS CUCULINO**

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 such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(7).

A TRUE BILL:



Salvatore L. Astolfi for
DAVID METCALF
UNITED STATES ATTORNEY

LORINDA LARYEA
Chief
Criminal Division, Fraud Section

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

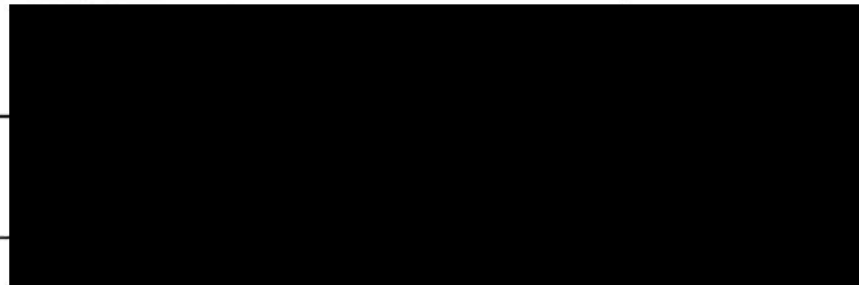
THE UNITED STATES OF AMERICA

vs.

DONNA ROMSTEADT
ALYSSA CUCULINO
LOUISE ISRAEL
ELEXIS CUCULINO

INDICTMENT

18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count)
18 U.S.C. § 1347 (health care fraud – 8 counts)
18 U.S.C. § 2 (aiding and abetting)



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: Philadelphia, Pennsylvania

County: Philadelphia

Register number: N/A

Place of accident, incident, or transaction: Eastern District of Pennsylvania

Post Office: Philadelphia

County: Philadelphia

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: Yes

Case Number: US v. Coccia, et al and US v. Joseph Pizzo, et al (filed same day)

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

1. ☐ Antitrust
2. ☐ Income Tax and other Tax Prosecutions
3. ☐ Commercial Mail Fraud
4. ☐ Controlled Substances
5. ☐ Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
6. ☒ General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND
STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS
CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)
(SEE reverse for Violations Charged and Additional Defendants)

DATE: 7/28/2026

/s/ Paul J. Koob

PAUL J. KOOB
CARLA JORDAN-DETAMORE
DOJ Trial Attorneys

File No. 2026R00
U.S. v. DONNA ROMSTEADT, et al

Violations:

18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count)

18 U.S.C. § 1347 (health care fraud – 8 counts)

18 U.S.C. § 2 (aiding and abetting)

Additional Defendants:

ALYSSA CUCULINO: Philadelphia, PA

LOUISE ISRAEL: Philadelphia, PA

ELEXIS CUCULINO: Philadelphia, PA