IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	**CRIMINAL NO: 26-**
v.	:	**DATE FILED:**
ALBERT R. COCCIA, JR. **SANTINO COCCIA**	: : : :	**VIOLATIONS:** **18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count)** **18 U.S.C. § 1347 (health care fraud – 5 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, known to the grand jury, was itself a health care benefit program, in that it was a public or private plan or contract, 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.

14. Defendant ALBERT R. COCCIA JR. ("ALBERT COCCIA") was a Medicaid recipient who was enrolled in CHC and received medical benefits, items, and services from Medicaid via CHC MCO #1. Defendant ALBERT COCCIA retained Agency #1 to provide purportedly necessary personal assistance services.

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

16. Defendant ALBERT COCCIA was defendant SANTINO COCCIA's father. Defendants ALBERT COCCIA and SANTINO COCCIA lived at the same residence, along with additional family members.

17. Defendant SANTINO COCCIA purported to provide personal assistance services to defendant ALBERT COCCIA from in or about February 2024 to in or about July

2026. Defendant SANTINO COCCIA was employed and paid by Agency #1 to provide such services to defendant ALBERT COCCIA.

18. 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 defendant SANTINO COCCIA to defendant ALBERT COCCIA, based on the entries in the EVV system.

19. From in or about February 2024 through in or about July 2026, in the Eastern District of Pennsylvania and elsewhere, defendants

ALBERT R. COCCIA, JR. and
SANTINO COCCIA

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 and CHC MCO #1, 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 and CHC MCO #1, 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:

20. Defendant SANTINO COCCIA was employed by Agency #1, purporting to provide personal assistance services as a PCA to Medicaid recipient defendant ALBERT COCCIA.

21. Defendant SANTINO COCCIA falsely represented, or caused to be falsely represented, that he performed personal assistance services for defendant ALBERT

COCCIA, knowing and intending that such false representations would result in the submission of false and fraudulent claims by Agency #1 to Medicaid and CHC MCO #1.

22. Defendant SANTINO COCCIA made those false representations by performing, or causing to be performed, false and fraudulent clock-ins and clock-outs, generally through EVV, for personal assistance services that he purportedly rendered and provided to defendant ALBERT COCCIA.

23. Despite purporting to provide personal assistance services to defendant ALBERT COCCIA and being paid for such services by Agency #1, defendant SANTINO COCCIA was in many cases engaged in other activities and not the care services he purported to be providing.

24. In many instances, defendant SANTINO COCCIA worked as an independent contractor for Company #1, a major national ride-share and food delivery provider, known to the grand jury, while he purported to provide personal care services to defendant ALBERT COCCIA. Defendant SANTINO COCCIA conducted hundreds of courier rides and deliveries for Company #1 that coincided with the times during which he purported to provide personal care services to defendant ALBERT COCCIA.

25. Defendant SANTINO COCCIA also purported to provide care to defendant ALBERT COCCIA through false EVV clock-ins and clock-outs when defendant ALBERT COCCIA was engaged in other activities separate and apart from defendant SANTINO COCCIA.

26. Based upon these false EVV entries, defendants ALBERT COCCIA and SANTINO COCCIA caused Agency #1 to submit false and fraudulent claims to CHC MCO #1 for those services. CHC MCO #1 paid Agency #1 based upon the claims, and Agency #1 then in

turn paid defendant SANTINO COCCIA an hourly rate for the purported services based upon the hours that were logged.

27. In order to conceal and disguise the scheme, defendant ALBERT COCCIA made one or more false representations during an in-home and telephonic evaluations to a CHC MCO #1 employee about defendant COCCIA's health and the amount of care defendant COCCIA needed.

28. Defendant SANTINO COCCIA in many instances shared the proceeds from Agency #1 with defendant ALBERT COCCIA.

29. In total, defendants ALBERT COCCIA and SANTINO COCCIA caused Agency #1 to bill CHC MCO #1, and CHC MCO #1 to pay Agency #1, at least approximately $211,417.86.

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 July 20, 2024, defendant SANTINO COCCIA, while working for Company #1 and making numerous deliveries around the Greater Philadelphia Area outside of the presence of defendant ALBERT COCCIA, submitted and caused the submission of a false EVV clock-in and clock-out purporting to provide personal care services to defendant ALBERT COCCIA.

2. On or about October 11, 2024, defendant SANTINO COCCIA, while working for Company #1 and making numerous deliveries around the Greater Philadelphia Area outside of the presence of defendant ALBERT COCCIA, submitted and caused the submission

of a false EVV clock-in and clock-out purporting to provide personal care services to defendant ALBERT COCCIA.

3. On or about February 11, 2025, defendant SANTINO COCCIA, while working for Company #1 and making numerous deliveries around the Greater Philadelphia Area outside of the presence of defendant ALBERT COCCIA, submitted and caused the submission of a false EVV clock-in and clock-out purporting to provide personal care services to defendant ALBERT COCCIA.

4. On or about June 7, 2025, defendant SANTINO COCCIA, while working for Company #1 and making numerous deliveries around the Greater Philadelphia Area outside of the presence of defendant ALBERT COCCIA. Despite being involved in a traffic stop in Chester, Pennsylvania, SANTINO COCCIA submitted and caused the submission of a false EVV clock-in and clock-out purporting to provide personal care services to defendant ALBERT COCCIA for the entire day.

5. On or about May 19, 2026, defendant ALBERT COCCIA participated in a sentencing hearing in a health care fraud case in the United States District Court for the Eastern District of Pennsylvania, outside of the presence of defendant SANTINO COCCIA. Despite not being present for the hearing, defendant SANTINO COCCIA submitted and caused the submission of a false EVV clock-in and clock-out purporting to provide personal care services to defendant ALBERT COCCIA for the entire day.

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

COUNTS TWO THROUGH SIX

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 18 and 20 through 29 and Acts in Furtherance of the Conspiracy paragraphs 1 through 5 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

ALBERT R. COCCIA, JR. and
SANTINO COCCIA

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 and CHC MCO #1, 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 and CHC MCO #1, 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	Approx. Date of Purported Service	Approx. Amount
2	July 20, 2024	$258.24
3	October 11, 2024	$258.24
4	February 11, 2025	$258.24
5	June 7, 2025	$199.06
6	May 19, 2026	$258.24

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

ALBERT R. COCCIA, JR. and
SANTINO COCCIA

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 defendants up to the value of the property subject to forfeiture.

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

[redacted]

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.

ALBERT R. COCCIA, JR.
SANTINO COCCIA

INDICTMENT

18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count)
18 U.S.C. § 1347 (health care fraud – 5 counts)
18 U.S.C. § 2 (aiding and abetting)

[redacted]

day,

Bail, $__________

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. Donna Romsteadt, 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. 2026R00662
U.S. v. ALBERT R. COCCIA, JR., et al

Violations:

18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count)
18 U.S.C. § 1347 (health care fraud – 5 counts)
18 U.S.C. § 2 (aiding and abetting)

Additional Defendants:

SANTINO COCCIA: Philadelphia, PA