

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

UNITED STATES OF AMERICA : **CRIMINAL NO:** _____

v. : **DATE FILED:** _____

CHARLES BOWIE : **VIOLATIONS:**

18 U.S.C. § 1347 (healthcare fraud – 1 count)

18 U.S.C. § 1343 (wire fraud – 13 counts)

18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

BACKGROUND

At all times material to this indictment:

1. Home Care Agency #1, an entity known to the grand jury, was a home care agency incorporated in or about June 2017 under the laws of the Commonwealth of Pennsylvania, with its principal place of business located in the 7900 block of Limekiln Pike, Philadelphia, Pennsylvania. Home Care Agency #1 was in the business of providing personal assistance services or “home care” services to patients in their private residences, often reimbursed by Medicaid. Since 2020, Home Care Agency #1 received approximately \$54 million in Medicaid reimbursements for home care services provided by its aides to individuals in the greater Philadelphia area. In or about July 2026, Home Care Agency #1 employed approximately 400 personal care attendants or “home care” aides.

2. Defendant CHARLES BOWIE was employed by Home Care Agency #1 as a home care aide beginning in or about February 2019. Throughout his time working at Home

Care Agency #1, defendant BOWIE was employed and assigned to provide home care services to Client #1, known to the grand jury, in Philadelphia, Pennsylvania.

3. Medicaid was a health care benefit program, as defined by 18 U.S.C. § 24(b), that is jointly funded by federal and state governments. On the federal side, Medicaid was overseen by the Centers for Medicare and Medicaid Services (CMS), of the Department of Health and Human Services. On the state side, in Pennsylvania, Medicaid was overseen by the Pennsylvania Department of Human Services and is also known as the “Medical Assistance” program. A person covered by Medicaid was referred to as a recipient, a consumer, or a beneficiary.

4. CMS allowed states to apply for Home and Community-Based Services waiver programs authorized in Section 1915(c) of the Social Security Act. Home and Community-Based Services waiver programs permitted a state to furnish an array of home and community-based services that assisted Medicaid beneficiaries in living in the community and avoiding institutionalization.

5. Pennsylvania designed and received CMS approval for a Home and Community-Based Services waiver program called the Community HealthChoices Waiver Program (“Waiver Program”). Pennsylvania’s Waiver Program was operated by the state’s Department of Human Services. The Waiver Program permitted Medicaid to pay for, among other things, home and community-based personal assistance services for recipients who otherwise would have needed to live in a nursing home because of disability, but instead chose to receive personal care services in a home or other community-based setting. To receive coverage for home care services, these Medicaid-eligible beneficiaries had to enroll with a Managed Care Organization (“MCO”), which in turn was the entity that approved the number of hours of home

care services for which a beneficiary was eligible, and it paid for the services that were provided. Each MCO that participated in Pennsylvania's Waiver Program 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, or services were provided to individuals.

6. The types of home care services provided to beneficiaries of Pennsylvania's Waiver Program included assisting individuals with completing their daily living activities, performing health maintenance activities, providing routine support services, accompanying individuals into the community, and providing incidental homemaker tasks. These services were commonly performed by aides who worked as employees of home care agencies such as Home Care Agency #1.

7. To be eligible for home care services in Pennsylvania, as part of the Waiver Program, a beneficiary had to meet nursing facility level of care criteria, have a physical disability, and choose to receive long-term services and support in a home setting.

8. Home care services provided as part of Pennsylvania's Waiver Program, through aides of a home care agency, were billed for and reimbursed by Medicaid, including the MCOs, in 15-minute increments.

9. Under the rules governing Pennsylvania's Waiver Program, authorized home care services that could be provided under the program, and compensated for by Medicaid, were a set of activities or services specified in a service plan, that generally had to be performed in the presence of the beneficiary and in the home of the beneficiary, for the purpose of ensuring the health and welfare of the beneficiary.

10. Section 12006(a) of the 21st Century Cures Act mandated that states implement Electronic Visit Verification (“EVV”) for all Medicaid home care services that required an in-home visit by a provider.

11. The EVV system was used by home care agencies to record and document how many hours a caregiver provided of personal assistance services to the recipient of those services. The EVV system captured information including the following data:

- a. Type of service performed;
- b. Individual receiving the service;
- c. Date of service;
- d. Individual providing the service; and
- e. Time the service began and ended.

12. Information could be entered into the EVV system through a mobile device application, by calling a designated phone number from the service location, or through a web-based portal. That is, caregivers could “clock in” and “clock out” of the EVV system—thereby recording the time they began to provide personal assistance services to a recipient and the time they ceased providing services—through using either a mobile app or calling a designated telephone number, and corrections to those entries could be made by the home care agency through a web-based portal. Paper timesheets could serve as a backup for times when the use of the EVV system was not possible for technical reasons.

13. Caregivers were responsible for checking in and checking out for each shift by using the EVV system.

14. Home care agencies could contract with one of several third-party providers of EVV software and web-based platforms, including Contractor #1, known to the

grand jury. Contractor #1 was a popular software program among home care agencies in Philadelphia and its surrounding counties for logging EVV information. When a home care agency used Contractor #1 to record EVV information related to the work of the agency's personal care aides, that information was transmitted to the MCOs for the purposes of submitting reimbursement claims. Contractor #1 used servers to host its data that were located in the Commonwealth of Virginia. Home Care Agency #1 used Contractor #1 for its EVV entries, which were then used as the basis for claims submitted by Home Care Agency #1 to MCOs.

THE SCHEME TO DEFRAUD

15. Defendant CHARLES BOWIE defrauded Pennsylvania's Medicaid program, including MCO #1 and MCO #2, known to the grand jury, by making or causing to be made materially false and fraudulent EVV entries, and subsequently false and fraudulent claims, purporting that defendant BOWIE provided home care services to Client #1, a person known to the grand jury, and an enrolled client at Home Care Agency #1, that defendant BOWIE did not in fact provide.

16. Defendant CHARLES BOWIE was the assigned aide for Client #1 from on or about February 8, 2019 through at least on or about May 1, 2026. During his time assigned to Client #1, defendant BOWIE falsely represented or caused to be represented, largely through EVV entries, that defendant BOWIE performed at least approximately 29,608 hours of home care services for Client #1, most of which were not actually provided.

17. During his time purporting to work as an aide, defendant CHARLES BOWIE caused Home Care Agency #1 to submit claims and be reimbursed approximately \$592,160 by Pennsylvania Medicaid, MCO #1, and MCO #2 for home care services purportedly provided by defendant BOWIE to Client #1.

18. From in or about February 2019, through in or about May 2026, in the Eastern District of Pennsylvania and elsewhere, defendant

CHARLES BOWIE

knowingly and willfully executed, and aided and abetted the execution of, a scheme and artifice to defraud health care benefit programs, specifically, Pennsylvania Medicaid, MCO #1, and MCO #2, and to obtain money and property owned by and under the custody and control of them, by means of materially false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care benefits, items and services.

MANNER AND MEANS

It was part of the scheme that:

19. Defendant CHARLES BOWIE routinely made or caused to be made false and fraudulent EVV entries purporting that he provided home care services to Client #1, which he was not in fact providing to Client #1. The false EVV entries generally reflected that defendant BOWIE provided between approximately 10 and 17 hours of home care services to Client #1 each day. In fact, defendant BOWIE generally provided Client #1 far less than approximately 10 to 17 hours of home care services a day. On many days, defendant BOWIE would not personally visit the home of Client #1 at all.

20. In many instances, defendant CHARLES BOWIE took trips and vacations, including trips overseas, during which time he was not in the physical presence of Client #1 and was not providing home care services to Client #1. Defendant BOWIE made or caused to be made false EVV entries purporting that he was rendering such home care services to Client #1 during these trips.

21. Defendant CHARLES BOWIE caused Home Care Agency #1 to bill MCO #1 and MCO #2 for home care services purportedly rendered by defendant BOWIE to Client #1, when in truth and in fact, defendant BOWIE had not performed all of those services.

22. Defendant CHARLES BOWIE received payments from Home Care Agency #1 based on reimbursements paid by MCO #1 and MCO #2 to Home Care Agency #1 for home care services purportedly rendered by defendant BOWIE to Client #1 that defendant BOWIE had not performed.

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

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

1. Paragraphs 1 through 17 and 19 through 22 of Count One are realleged here.
2. From in or about February 2019, through in or about May 2026, in furtherance of the scheme, defendant CHARLES BOWIE caused false EVV entries for reimbursement to be submitted for Home Care Agency #1 to MCO #1 and MCO #2 by means of wire communications transmitted in interstate commerce to servers in the Commonwealth of Virginia from the Eastern District of Pennsylvania.
3. On or about each of the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

CHARLES BOWIE,

having devised and intending to devise a scheme to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme to defraud described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce the writings, signs, signals, pictures, and sounds described below, that is, false EVV entries by wire outside of Pennsylvania asserting that he performed personal assistance services for Client #1 on or about the stated date, each transmission constituting a separate count:

COUNT	APPROXIMATE DATE
2	August 22, 2021
3	November 6, 2021

COUNT	APPROXIMATE DATE
4	March 5, 2022
5	July 27, 2022
6	October 7, 2022
7	March 2, 2023
8	March 12, 2023
9	April 12, 2023
10	July 28, 2023
11	November 8, 2024
12	January 16, 2025
13	January 23, 2024
14	April 2, 2025

All in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1343 and 1347 as set forth in this indictment, defendant

CHARLES BOWIE

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 offenses

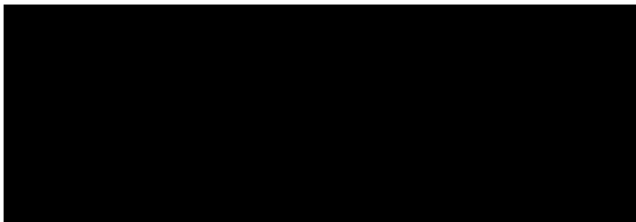
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (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;

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

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

CHARLES BOWIE

INDICTMENT

Counts

18 U.S.C. § 1347 – healthcare fraud – 1 count

18 U.S.C. § 1343 (wire fraud – 13 counts)

18 U.S.C. § 2 (aiding and abetting)

Notice of Forfeiture

Bail, \$ _____

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

INDICTMENT

DESIGNATION FORM

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

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: Philadelphia, PA

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: NO

Case Number:

Judge:

CRIMINAL:

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

18 U.S.C. § 1347 (healthcare fraud – 1 count); 18 U.S.C. § 1343 (wire fraud – 13 counts);
18 U.S.C. § 2 (aiding and abetting); Notice of Forfeiture

DATE: July 29, 2026

s/ Angella N. Middleton

Angella N. Middleton

Sara A. Solow
Assistant United States Attorneys