

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

UNITED STATES OF AMERICA	:	CRIMINAL NO: _____
v.	:	DATE FILED: _____
BENEVOLENT HOME HEALTH CARE, LLC KHALEELAH WILLIAMS SALEEMAH DAVIS	:	VIOLATIONS: 18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count) 18 U.S.C. § 1347 (health care fraud – 1 count) 18 U.S.C. § 1343 (wire fraud – 14 counts) 18 U.S.C. § 1028A (aggravated identity theft – 4 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 federal and state governments. On the federal side, Medicaid was overseen by the Centers for Medicare and Medicaid Services (“CMS”) of the United States Department of Health and Human Services (“HHS”). On the state side, in Pennsylvania, Medicaid, also known as “Medical Assistance,” was 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, affecting commerce, under which medical benefits, items, or services were provided.

5. Personal assistance services, also called personal care services, were aimed at assisting the recipient in completing tasks of daily living that would have been performed independently if the recipient had no disability, including eating, bathing, toileting, transferring, and personal hygiene, among other things. For Medicaid recipients who could only live outside of an institutional setting with assistance performing activities of daily living, a personal care assistant (“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 a PCA to supply the personal assistance services for which the recipient had been approved.

7. The Agency was responsible for keeping records of all dates and times that a PCA provided services to a recipient. Personal assistance services were billed to the CHC MCO in 15-minute increments or units.

8. A service plan was created for each recipient by the Agency, and based on this plan, a number of weekly service hours was authorized. The Agency was responsible for ensuring the PCA provided the consumer with services as specified in the service plan. Only the actual time worked by a PCA was eligible for Medicaid reimbursement.

9. The CHC required use of Electronic Visit Verification (“EVV”) for personal assistance services. *See* 42 U.S.C. § 1396b(l)(1) (reducing reimbursements for states that do not implement EVV by target dates). 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;
- e. Individual providing the service; and
- f. Time the service begins and ends.

42 U.S.C. § 1396b(l)(5)(A).

10. EVV was performed over telephone lines (by calling a designated phone number from the service location) or via computer or mobile device application, and corrections or edits, or manual adjustments, could be made through a web-based portal. A PCA was responsible for checking in and checking out for each shift using EVV.

11. In Pennsylvania, an Agency could use any EVV system that it chose. The Agency was responsible for submitting correct EVV data. An Agency's EVV data was electronically transmitted to computer servers operated or controlled by a third-party vendor for the CHC MCOs ("the Vendor"). An Agency submitted claims through the Vendor. Prior to paying a claim, the CHC MCO compared the claim to the EVV data. EVV entries are a basis for electronically submitting claims to MCOs, making the accuracy of the records regarding which personal assistance services were performed over what time frame, material to the program. PCAs were supposed to be paid for the number of personal assistance services hours the PCA reported as having worked through the EVV process.

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. Defendant BENEVOLENT HOME HEALTH CARE, LLC was a licensed Agency, headquartered in Philadelphia, Pennsylvania. Defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS owned and operated defendant BENEVOLENT HOME HEALTH CARE, LLC, with defendant WILLIAMS acting as President and defendant DAVIS as Vice-President.

14. Defendant BENEVOLENT HOME HEALTH CARE, LLC used the Vendor, known to the grand jury, to collect and process EVV data for services allegedly provided to recipients by PCAs employed by defendant BENEVOLENT HOME HEALTH CARE, LLC. The Vendor assigned each PCA employed by defendant BENEVOLENT HOME HEALTH CARE, LLC a unique Time and Attendance PIN to use to clock in and out of shifts using the EVV system.

15. Various Medicaid recipients, including Recipients #1 through #4, known to the grand jury, utilized defendant BENEVOLENT HOME HEALTH CARE, LLC to receive personal assistance services purportedly needed by the recipients. Recipients #1 through #4 were each enrolled in CHC and each received medical benefits, items, and services from Medicaid and from CHC MCO #1.

16. Defendant BENEVOLENT HOME CARE, LLC, through defendant KHALEELAH WILLIAMS and defendant SALEEMAH DAVIS, billed and was paid by CHC MCO #1 for personal assistance services, including services purportedly rendered to Recipients #1 through #4, knowing that many of those services had not been rendered.

17. From at least in or about December 2023 through at least in or about December 2025, in the Eastern District of Pennsylvania, and elsewhere, defendants

**BENEVOLENT HOME HEALTH CARE, LLC,
KHALEELAH WILLIAMS, and
SALEEMAH DAVIS**

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 a health care benefit program, specifically Medicaid and CHC MCO #1, and to obtain money and property owned by them and under their custody and control, 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, in violation of Title 18, United States Code, Section 1347.

MANNER AND MEANS

It was part of the conspiracy that:

18. Defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS controlled and operated defendant BENEVOLENT HOME HEALTH CARE, LLC.

19. Defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS caused defendant BENEVOLENT HOME HEALTH CARE, LLC to become licensed as an Agency in Pennsylvania and to become authorized to participate as a provider with Medicaid and CHC MCO #1.

20. In addition to controlling and managing defendant BENEVOLENT HOME HEALTH CARE, LLC, defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS performed or caused to be performed false EVV clock-ins and clock-outs through defendant BENEVOLENT HOME HEALTH CARE, LLC, including by personally making manual adjustments to EVV data, for personal assistance services they knew were not actually rendered, including because the PCAs who purportedly provided the services were physically incapable of providing them at that time as they were incarcerated, ill, or deceased.

21. Defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS caused individuals related to them, including PCA #1 and PCA #2, known to the grand jury, to become enrolled and employed as PCAs with defendant BENEVOLENT HOME HEALTH CARE, LLC.

22. From at least on or about September 6, 2024 to at least on or about November 18, 2024, defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, on approximately 76 occasions, performed or caused to be performed false EVV clock-ins and clock-outs purporting that PCA #1 provided personal assistance services to Recipients #1 and #2. However, PCA #1 was in fact incarcerated in the federal detention center in Philadelphia, Pennsylvania during this period, and thus was not capable of providing such care.

23. From at least in or about January 2024 to on or about September 4, 2024, additional false EVV clock-ins and clock-outs that purported that PCA #1 had provided personal

assistance services to Recipients #1 and #2 were also performed or caused to be performed by defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, when PCA #1 did not perform such services.

24. From at least on or about December 20, 2024 to on or about December 4, 2025, defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, on more than approximately 600 occasions, performed or caused to be performed false EVV clock-ins and clock-outs purporting that PCA #2 provided personal assistance services to Recipients #3 and #4. However, PCA #2 began palliative care on or about December 20, 2024 and ultimately died of cancer on or about January 2, 2025, and thus was not capable of providing such care.

25. Prior to PCA #2's incapacitation and death, from at least on or about December 8, 2023 to on or about December 20, 2024, additional false EVV clock-ins and clock-outs that purported that PCA #2 had provided personal assistance services to Recipient #4 were also performed or caused to be performed by defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, when PCA #2 did not perform such services. PCA #2, in fact, never provided any personal assistance services to Recipient #4. Instead, defendant WILLIAMS provided to Individual #1, known to the grand jury, the EVV login assigned to PCA #2 and instructed Individual #1 to call in EVV entries using that login to falsely record that PCA #2 provided personal assistance services. On many occasions, defendants WILLIAMS and DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, performed or caused to be performed such false EVV clock-ins and clock-outs.

26. Also prior to PCA #2's incapacitation and death, from at least on or about September 26, 2024 to on or about December 20, 2024, additional false EVV clock-ins and clock-outs that purported that PCA #2 had provided personal assistance services to Recipient #3 were entered by defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, when PCA #2 did not perform such services.

27. Based on these false EVV entries, defendants BENEVOLENT HOME HEALTH CARE, LLC, KHALEELAH WILLIAMS, and SALEEMAH DAVIS, submitted and caused to be submitted billings to CHC MCO #1, falsely claiming that personal assistance services were purportedly performed by PCA #1 and PCA #2 to Recipients #1 through #4, when in truth and in fact, and as the defendants well knew, those PCAs had not rendered such services.

28. CHC MCO #1 paid defendant BENEVOLENT HOME HEALTH CARE, LLC, not less than approximately \$224,000 for personal assistance services purportedly rendered by PCA #1 and PCA #2 to Recipients #1 through #4, and defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS ultimately received those proceeds, directly or indirectly.

OVERT ACTS

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

1. On or about December 11, 2023, defendant KHALEELAH WILLIAMS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #4 on or about December 8, 2023.

2. On or about February 5, 2024, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #2 on or about February 1, 2024.

3. On or about May 6, 2024, defendant KHALEELAH WILLIAMS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #2 on or about May 4, 2024.

4. On or about May 7, 2024, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #1 on or about May 6, 2024.

5. On or about June 4, 2024, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #1 on or about June 1, 2024.

6. On or about August 7, 2024, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #2 on or about August 6, 2024.

7. On or about September 11, 2024, defendant KHALEELAH WILLIAMS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a

false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #1 on or about September 10, 2024.

8. On or about September 28, 2024, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #3 on or about September 28, 2024.

9. On or about September 30, 2024, defendant KHALEELAH WILLIAMS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #1 on or about September 29, 2024.

10. On or about October 4, 2024, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #1 had performed personal assistance services for Recipient #1 on or about October 2, 2024.

11. On or about December 25, 2024, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #3 on or about December 25, 2024.

12. On or about January 6, 2025, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #3 on or about December 31, 2024.

13. On or about January 6, 2025, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #3 on or about January 2, 2025.

14. On or about March 17, 2025, defendant KHALEELAH WILLIAMS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #4 on or about March 14, 2025.

15. On or about April 28, 2025, defendant KHALEELAH WILLIAMS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #4 on or about April 28, 2025.

16. On or about September 8, 2025, defendant SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made a false EVV entry purporting that PCA #2 had performed personal assistance services for Recipient #3 on or about September 5, 2025.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 28 and the Overt Acts of Count One are realleged here.

2. From at least in or about December 2023 through at least in or about December 2025, in the Eastern District of Pennsylvania and elsewhere, defendants

**BENEVOLENT HOME HEALTH CARE, LLC,
KHALEELAH WILLIAMS, and
SALEEMAH DAVIS**

knowingly and willfully executed, and aided and abetted the execution of, a scheme and artifice to defraud a health care benefit program, 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.

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

COUNTS THREE THROUGH SIXTEEN**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 16 and 18 through 28 and the Overt Acts of Count One are realleged here.

2. From at least in or about December 2023 through at least in or about December 2025, in furtherance of the scheme, defendants KHALEELAH WILLIAMS and SALEEMAH DAVIS, through defendant BENEVOLENT HOME HEALTH CARE, LLC, made or caused to be made false EVV entries, and in turn submitted or caused the submission of false claims for reimbursement to be submitted by defendants to CHC MCO #1, 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 the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendants

**BENEVOLENT HOME HEALTH CARE, LLC,
KHALEELAH WILLIAMS, and
SALEEMAH DAVIS,**

for the purpose of executing the scheme described above, transmitted or caused to be transmitted by means of wire communication in interstate and foreign commerce the writings, signs, signals, and sounds described below, each transmission constituting a separate count:

COUNT	APPROXIMATE DATE	DESCRIPTION
3	December 11, 2023	False EVV entry, sent by defendant KHALEELAH WILLIAMS by wire outside of Pennsylvania, asserting that PCA #2 performed personal assistance services for Recipient #4 on or about December 8, 2023

COUNT	APPROXIMATE DATE	DESCRIPTION
4	February 5, 2024	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #1 performed personal assistance services for Recipient #2 on or about February 1, 2024
5	May 6, 2024	False EVV entry, sent by defendant KHALEELAH WILLIAMS by wire outside of Pennsylvania, asserting that PCA #1 performed personal assistance services for Recipient #2 on or about May 4, 2024
6	May 7, 2024	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #1 performed personal assistance services for Recipient #1 on or about May 6, 2024
7	June 4, 2024	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #1 performed personal assistance services for Recipient #1 on or about June 1, 2024
8	September 11, 2024	False EVV entry, sent by defendant KHALEELAH WILLIAMS by wire outside of Pennsylvania, asserting that PCA #1 performed personal assistance services for Recipient #1 on or about September 10, 2024
9	September 28, 2024	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #2 performed personal assistance services for Recipient #3 on or about September 28, 2024
10	September 30, 2024	False EVV entry, sent by defendant KHALEELAH WILLIAMS by wire outside of Pennsylvania, asserting that PCA #1 performed personal assistance services for Recipient #1 on or about September 29, 2024
11	October 4, 2024	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #1 performed personal assistance services for Recipient #1 on or about October 2, 2024

COUNT	APPROXIMATE DATE	DESCRIPTION
12	December 25, 2024	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #2 performed personal assistance services for Recipient #3 on or about December 25, 2024
13	January 6, 2025	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #2 performed personal assistance services for Recipient #3 on or about January 2, 2025
14	March 17, 2025	False EVV entry, sent by defendant KHALEELAH WILLIAMS by wire outside of Pennsylvania, asserting that PCA #2 performed personal assistance services for Recipient #4 on or about March 14, 2025
15	April 28, 2025	False EVV entry, sent by defendant KHALEELAH WILLIAMS by wire outside of Pennsylvania, asserting that PCA #2 performed personal assistance services for Recipient #4 on or about April 28, 2025
16	September 8, 2025	False EVV entry, sent by defendant SALEEMAH DAVIS by wire outside of Pennsylvania, asserting that PCA #2 performed personal assistance services for Recipient #3 on or about September 5, 2025

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

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 28 and the Overt Acts of Count One and paragraph 2 of Counts Three through Sixteen are realleged here.
2. On or about January 6, 2025, in the Eastern District of Pennsylvania and elsewhere, defendant

SALEEMAH DAVIS

knowingly and without lawful authority, used a means of identification of another person, that is, PCA #2's name and associated EVV data, during and in relation to wire fraud, as charged in Count Thirteen, knowing that the means of identification belonged to another real person, that is, PCA #2.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 28 and the Overt Acts of Count One and paragraph 2 of Counts Three through Sixteen are realleged here.

2. On or about March 17, 2025, in the Eastern District of Pennsylvania and elsewhere, defendant

KHALEELAH WILLIAMS

knowingly and without lawful authority used a means of identification of another person, that is, PCA #2's name and associated EVV data, during and in relation to wire fraud, as charged in Count Fourteen, knowing that the means of identification belonged to another real person, that is, PCA #2.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 28 and the Overt Acts of Count One and paragraph 2 of Counts Three through Sixteen are realleged here.
2. On or about April 28, 2025, in the Eastern District of Pennsylvania and elsewhere, defendant

KHALEELAH WILLIAMS

knowingly and without lawful authority used a means of identification of another person, that is, PCA #2's name and associated EVV data, during and in relation to wire fraud, as charged in Count Fifteen, knowing that the means of identification belonged to another real person, that is, PCA #2.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 16 and 18 through 28 and the Overt Acts of Count One and paragraph 2 of Counts Three through Sixteen are realleged here.
2. On or about September 8, 2025, in the Eastern District of Pennsylvania and elsewhere, defendant

SALEEMAH DAVIS

knowingly and without lawful authority used a means of identification of another person, that is, PCA #2's name and associated EVV data, during and in relation to wire fraud, as charged in Count Sixteen, knowing that the means of identification belonged to another real person, that is, PCA #2.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1343, 1347, and 1349 set forth in this indictment, defendants

**BENEVOLENT HOME HEALTH CARE, LLC,
KHALEELAH WILLIAMS, and
SALEEMAH DAVIS**

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 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).

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.

**BENEVOLENT HOME HEALTH CARE, LLC
KHALEELAH WILLIAMS
SALEEMAH DAVIS**

INDICTMENT

18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count)
18 U.S.C. § 1347 (health care fraud – 1 count)
18 U.S.C. § 1343 (wire fraud – 14 counts)
18 U.S.C. § 1028A (aggravated identity theft – 4 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: NO

Case Number: N/A

Judge: N/A

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 Charges and Additional Defendants)

DATE: 7/30/2026

/s/ Megan Curran

MEGAN CURRAN

Special Assistant United States Attorney

JESSICA RICE

Assistant United States Attorney

File No. 2025R00080

U.S. v. BENEVOLENT HOME HEALTH CARE, LLC, et al

Violations:

18 U.S.C. § 1349 (conspiracy to commit health care fraud – 1 count)
18 U.S.C. § 1347 (health care fraud – 1 count)
18 U.S.C. § 1343 (wire fraud – 14 counts)
18 U.S.C. § 1028A (aggravated identity theft – 4 counts)
18 U.S.C. § 2 (aiding and abetting)

Additional Defendants:

KHALEELAH WILLIAMS – Philadelphia, PA
SALEEMAH DAVIS – Philadelphia, PA