UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

KONSTANTIN BRAVERMAN

Case No. 3:26-cr-125-JEP-LLL
18 U.S.C. § 1349
18 U.S.C. § 371

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy to Commit Health Care Fraud)

A. Introduction

At all times material to this Indictment:

1. Medicare was a federally funded health care benefit program that provided medical coverage for persons age 65 and over and for persons under age 65 who were disabled.

2. Medicare was a "Federal health care program" as defined in 42 U.S.C. § 1320a-7b(f).

3. Medicare was a "health care benefit program" as defined in 18 U.S.C. § 24(b).

4. Medicare was divided into four parts: A, B, C, and D. Part B provided supplementary medical insurance benefits that covered certain doctors' services, outpatient care, preventive services, and medical supplies.

5. Each Medicare beneficiary was identified with a unique beneficiary identifier number ("BIN"). These BINs were used, among other things, to determine a beneficiary's eligibility for Medicare benefits, and to submit claims to Medicare seeking reimbursement for covered benefits, items, and services. Two types of BINs established under Title 42, United States Code, Chapter 7, subsection XVIII, were Health Insurance Claim Numbers ("HICNs") and Medicare Beneficiary Identifiers ("MBIs").

6. HICNs were typically comprised of the beneficiary's social security number and often included one or more additional letters. In 2015, Congress passed the Medicare Access and CHIP Reauthorization Act ("MACRA"), which mandated the phase-out of the use of social security numbers in the assignment of BINs.

7. From April 4, 2022, until the declared end of the COVID-19 public health emergency on May 11, 2023, Medicare covered and paid for OTC ("over the counter," i.e., not prescribed or ordered by a physician) rapid antigen COVID-19 tests for beneficiaries with Medicare Part B, at no cost to the beneficiaries. However, Medicare regulations provided that Medicare would pay for such tests only if a beneficiary requested the tests.

8. GoGo Covid Test LLC ("GoGo") was a business and business name established and used by co-conspirator Caeser Alexander Silva ("Silva").

9. Meta Laboratory Consulting LLC ("Meta") was a business and business name established and used by co-conspirators Silva and Kevin Karl Wills Jr. ("Wills").

10. PMF Services LLC ("PMF") was a business and business name established and used by co-conspirator Patrick Michael Flint ("Flint").

11. Advanced Marketing Solutions USA, LLC, was a business and business name established and used by co-conspirator Noel Gary Beres ("Beres").

12. SWL Services LLC ("SWL Services") was a corporation with its principal place of business in Jacksonville, in the Middle District of Florida, that was enrolled as a participating provider with Medicare. Co-conspirators Courtney Shauta' Lewis ("Lewis") and Latania Renee Smith-Washington ("Smith-Washington") were the principals of SWL Services.

13. Minute Lab LLC ("Minute Lab") was a corporation with its principal place of business in Pembroke Pines, Florida, that was enrolled as a participating provider with Medicare. Co-conspirator Keirshea Treina Smith ("Smith") was a principal of Minute Lab.

B. Charge

Beginning in or about January 2023 and continuing through in or about November 2023, in the Middle District of Florida, and elsewhere, the defendant,

KONSTANTIN BRAVERMAN,

did knowingly and willfully combine, conspire, confederate, and agree with others, both known and unknown, to execute and attempt to execute a scheme and artifice to defraud 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 a health care benefit program, that is, Medicare in connection with the payment for health care benefits, items, and services, as more fully described herein, in violation of 18 U.S.C. § 1347.

C. Manner and Means

The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, but were not limited to, the following:

1. The defendant and co-conspirators entered into "consulting" agreements with medical service providers pursuant to which the defendant and co-conspirators introduced "marketers" to the providers.

2. The "marketers" agreed to sell the providers lists of Medicare beneficiaries and their identifying information, including their Medicare beneficiary identification numbers, to facilitate the providers' shipping COVID-19 tests to the identified beneficiaries.

3. The providers shipped the COVID-19 tests to the identified beneficiaries, none of whom had requested the tests.

4. The providers billed Medicare for the tests and then paid the "marketers" and other co-conspirators a set dollar amount per beneficiary, but the providers paid this amount only if a claim submitted on behalf of a beneficiary was reimbursed by Medicare.

5. The "marketers" and other co-conspirators paid the defendant a share of the proceeds obtained from the providers.

6. The defendant received a total of approximately $1,509,426 in proceeds as a result of his involvement in the offense.

7. The actions of the defendant and co-conspirators caused the submission of approximately 152,000 false and fraudulent claims to Medicare, which resulted in reimbursements from Medicare for the period totaling approximately $14,405,700.

In violation of 18 U.S.C. § 1349.

COUNT TWO
(Conspiracy to Solicit and Receive Kickbacks and to Sell and Distribute Medicare Beneficiary Identification Numbers)

A. Introduction

Part A of Count One of this Indictment is realleged and incorporated herein.

B. Charge

Beginning in or about January 2023 and continuing through in or about November 2023, in the Middle District of Florida, and elsewhere, the defendant,

KONSTANTIN BRAVERMAN,

did knowingly and willfully combine, conspire, confederate, and agree with others, both known and unknown, to commit an offense against the United States, that is:

(1) to knowingly and willfully solicit and receive remuneration, by kickback, bribe, and rebate, directly and indirectly, overtly and covertly, in cash and in kind, in return for referring a person for the furnishing and arranging for the furnishing of an item and service for which payment may be made in whole and in part under a Federal health care program, that is, Medicare, in violation of 42 U.S.C. § 1320a-7b(b)(1)(A), and

(2) without lawful authority, to knowingly and willfully, purchase, sell, distribute, and arrange for the purchase, sale, and distribution of beneficiary identification numbers under Title 42, United States Code, Chapter 7, subsection XVIII, that is, HICNs and MBIs, in violation of 42 U.S.C. § 1320a-7b(b)(4).

C. Manner and Means

Part C of Count One of this Indictment is realleged and incorporated herein.

D. Overt Acts

In furtherance of the conspiracy and to effectuate the objects thereof, the following overt acts, among others, were committed within the Middle District of Florida and elsewhere:

1. On or about February 8, 2023, a conspirator sent a written agreement to Lewis and Smith-Washington between SWL and Flint. The agreement did not set forth the terms of the actual agreement between them by which SWL Services would pay Flint $25 for each COVID-19 test kit processed and shipped by SWL Services in exchange for Flint agreeing to provide Medicare beneficiary identifying information to SWL Services.

2. On or about April 18, 2023, a conspirator sent a written agreement to Lewis and Smith-Washington between SWL and Beres. The agreement did not set forth the terms of the actual agreement between them by which SWL Services would pay Beres $15 for each COVID-19 test kit processed and shipped by SWL Services in

exchange for Beres agreeing to provide Medicare beneficiary identifying information to SWL Services.

3. For the period from in or about February 2023 through in or about June 2023, Lewis and Smith-Washington submitted and caused to be submitted approximately 64,673 false and fraudulent claims to Medicare on behalf of SWL Services and received reimbursements from Medicare for those claims totaling approximately $3,977,714.

4. On or about January 9, 2023, the defendant and Silva discussed in text messages a written agreement between Minute Lab and Flint. The agreement did not set forth the terms of the actual agreement between them by which Minute Lab would pay Flint $25 for each COVID-19 test kit processed and shipped by Minute Lab in exchange for Flint agreeing to provide Medicare beneficiary identifying information to Minute Lab.

5. For the period from in or about February 2023 through in or about June 2023, Smith submitted and caused to be submitted approximately 6,466 false and fraudulent claims to Medicare on behalf of Minute Lab and received reimbursements from Medicare for those claims totaling approximately $569,701.

In violation of 18 U.S.C. § 371.

FORFEITURE

1. The allegations contained in Counts One and Two are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(7).

2. Upon conviction of a conspiracy to violate 18 U.S.C. § 1347, in violation of 18 U.S.C. § 1349, or a conspiracy to violate 42 U.S.C. § 1320a-7b(b)(1)(A) or § 1320a-7b(b)(4), in violation of 18 U.S.C. § 371, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), any property, real or personal, which constitutes or is derived, directly or indirectly, from gross proceeds traceable to the offense.

3. The property to be forfeited includes, but is not limited to, an order of forfeiture for at least approximately $1,509,426, which represents the proceeds of the offenses.

4. If any of the property described above, as a result of any act or omission of a 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL,

GREGORY W. KEHOE
United States Attorney

By: ______________________
ARNOLD B. CORSMEIER
Assistant United States Attorney

By: ______________________
For KARA WICK
Assistant United States Attorney
Chief, Health Care Fraud Section

FORM OBD-34
6/17/26 Revised

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

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INDICTMENT

Violations: 18 U.S.C. § 1349
18 U.S.C. § 371

Foreperson

Filed in open court this 18th day

of June, 2026.

Clerk

Bail $____________________