

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

UNITED STATES OF AMERICA

v.

**SEALED
INDICTMENT**

**STEPHANIE LYNN FLEMING
and
HELEN ELIZABETH STOREY**

4:19 cr 77-MW

THE GRAND JURY CHARGES:

COUNT ONE

A. INTRODUCTION

At all times material to this Indictment:

1. The Florida Medicaid Program ("Florida Medicaid") was a partnership between the state of Florida and the federal government that provided medical assistance and healthcare coverage to eligible low-income Florida families and individuals ("recipients"). Florida Medicaid was authorized by Title XIX of the Social Security Act, Chapter 409, Florida Statutes, and Chapter 59G, Florida Administrative Code. Florida Medicaid was financed with both federal and state funds, and was a "health care benefit program," as defined by Title 18, United States Code, Section 24(b), that affected commerce, as that term is used in Title 18,

United States Code, Section 1347. The Agency for Health Care Administration (“AHCA”) was a State of Florida agency responsible for Florida Medicaid. Each Florida Medicaid recipient was issued a unique ID number (“Medicaid recipient ID number”) by AHCA, which was used in the submission of Florida Medicaid claims, determination of Florida Medicaid eligibility, and for processing and adjudicating Florida Medicaid claims.

2. Under Florida Medicaid, a Florida Medicaid provider (“Provider”) was a person, organization, or institution having a written agreement with the State of Florida and its Managed Care Organizations (“MCOs”) to: (1) provide services to recipients, (2) submit claims for services rendered, (3) accept as payment in full the amount paid by Florida Medicaid for submitted claims. Providers were required to possess and maintain a valid professional license pertinent to the services they were providing to Medicaid recipients, and were required to comply with all applicable rules and regulations. Each provider was issued a manual or was provided with online access to regulations outlining participation requirements and guidelines. Each provider was issued a unique Florida Medicaid ID number (“Medicaid provider ID number”) by AHCA which was used in the submission, processing, and payment of Florida Medicaid claims. When a provider submitted claims to Florida Medicaid, it included information such as the recipient’s name and address, the recipient’s Medicaid recipient ID number, the date and type of

service provided, the place of service, the rendering provider's Medicaid provider ID number and name, the procedure code, the diagnosis code, the amount billed, and other relevant medical or health information.

3. DXC Technology was located in Tallahassee, Florida, and was the fiscal agent for the State of Florida that administered Florida Medicaid funds to providers in Florida. DXC Technology was under contract with AHCA to receive claims from participating providers generally by means of electronic submission through an Internet web portal. For each provider claim received, DXC Technology would assign a distinct and specific Internal Control Number ("ICN") and subsequently would coordinate the verification of each claim through an electronic remittance voucher ("ERV") system.

4. Prestige, Florida Department of Health Children's Medical Services, and WellCare were MCOs that provided for the delivery of Medicaid health benefits and services through contracted arrangements with AHCA. MCOs accepted a set per-member, per-month ("capitation") payment from AHCA for these services. Some MCOs, such as WellCare and Prestige, required individual providers to enter into a separate written provider agreement with the MCO in order to receive claim reimbursements from Medicaid. Beacon Health Strategies, LLC ("Beacon") was the contracted vendor for Prestige from in or about August 2010, until in or about December 2018.

5. AHCA and MCOs would ensure that each electronically submitted claim was from a valid provider, for a valid recipient, and for a valid Florida Medicaid service.

6. To be eligible to submit claims to Florida Medicaid and receive Florida Medicaid reimbursement, a person, organization, or institution had to be an authorized provider with Florida Medicaid or one of its MCOs.

7. AHCA would pay reimbursements to providers via electronic funds transfer (“EFT”) into the providers’ account at a designated financial institution, or via a flat per-member, per-month fee to the MCOs from which the MCOs would pay claims submitted by providers.

8. Providers submitted claims to Florida Medicaid using standardized codes to describe the diagnosis (i.e. diagnosis code) and the procedures (i.e. procedure code) for which payment was sought. Each procedure was submitted to Florida Medicaid as a “claim line,” and one or more claim lines constituted a claim.

9. North Florida Mental Health, LLC (“NFMH”) was a Florida Limited Liability Company registered and managed by defendant **HELEN ELIZABETH STOREY**. NFMH was a counseling center that employed mental health professionals who provided mental and behavioral health services to patients in Tallahassee and the surrounding areas. NFMH was enrolled with AHCA as an

authorized provider beginning in or about February 2016. NFMH's principal place of business was located in Tallahassee, Leon County, Florida. The mailing address and registered agent address for NFMH was in Tallahassee, Leon County, Florida 32304.

10. Beginning on or about August 27, 2015, defendant **HELEN ELIZABETH STOREY** maintained and had signatory authority on two accounts, ending in -2752 and -0566, in the name of NFMH, at Navy Federal Credit Union ("NFCU"). Defendant **STEPHANIE LYNN FLEMING** was added as a signatory for the accounts on August 27, 2015.

11. Defendant **STEPHANIE LYNN FLEMING** was a Florida licensed mental health counselor from on or about April 11, 2013, until on or about March 31, 2017. **FLEMING** applied to become an authorized AHCA provider on or about April 11, 2013, and became an authorized AHCA provider on or about May 21, 2013. Since on or about August 27, 2015, **FLEMING** was affiliated with NFMH. On or about February 2, 2016, **FLEMING** pled guilty to a felony, namely, "Med Assist Prog – Makes or Causes False Statements," in violation of New Jersey Revised Statutes 30:4D-17(B)(1). **FLEMING** reapplied to be an authorized provider with WellCare and executed a written provider agreement on March 19, 2016, in which she falsely attested that she had not pled guilty or nolo contendere to illegal conduct within the past ten years, and that she had not pled

guilty or nolo contendere to a felony. **FLEMING** was disqualified as a provider by ACHA on or about March 24, 2016, then she agreed to disbarment from participation in any state Medicaid program on or about April 15, 2016.

FLEMING was rendered ineligible as an authorized provider on September 21, 2016. Her status as an authorized provider was terminated by AHCA on or about March 30, 2017. Further, **FLEMING** executed a written practitioner network agreement to become a provider with Prestige, through its vendor, Beacon, on or between February 15, 2017 and March 10, 2017, in which she falsely attested that she had not pled guilty or nolo contendere to illegal conduct within the past ten years, and that she had not pled guilty or nolo contendere to a felony.

12. Florida licensed mental health therapists were required to notify the Florida Department of Health Board of Clinical Social Work, Marriage and Family Therapy, and Mental Health Counseling (“the Board”) within 30 days after a conviction, finding of guilt, or plea of nolo contendere to a crime in any jurisdiction, including those which relate to health care fraud. As a Florida licensed mental health therapist, **STEPHANIE LYNN FLEMING** had a duty to notify the Board of: (a) the criminal prosecution against her; (b) her conviction relating to health care fraud in the State of New Jersey; (c) her surrender of her New Jersey professional counselor license; and (d) her agreement to be disbarred

from participating in any federally or state-funded health insurance or prescription assistance program, including Medicaid, and **FLEMING** failed to do so.

13. G.A.G. was a Florida licensed clinical social worker since on or about March 11, 2002. G.A.G. was an authorized provider, and since approximately March 1, 2016, G.A.G. worked for NFMH.

B. THE CHARGE

Between on or about April 15, 2016, and on or about December 31, 2017, in the Northern District of Florida, and elsewhere, the defendants,

STEPHANIE LYNN FLEMING
and
HELEN ELIZABETH STOREY,

did knowingly and willfully conspire, combine, confederate, and agree together and with other persons to commit offenses against the United States, namely:

1. to knowingly and willfully execute or attempt to execute a scheme to obtain, by means of material false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of a health care benefit program, 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(a)(2); and

2. to devise, and intend to devise, a scheme to defraud and for obtaining money and property by means of material false and fraudulent pretenses,

representations, and promises, and to cause wire communications to be transmitted in interstate commerce for the purpose of executing such scheme, in violation of Title 18, United States Code, Section 1343.

C. MANNER AND MEANS

It was part of this conspiracy that:

1. In order for NFMH to become a provider with ACHA so NFMH could receive claim reimbursements from Medicaid, in or about February 2016, defendant **HELEN ELIZABETH STOREY** made and submitted, and caused to be made and submitted, materially false, fictitious, and fraudulent statements, representations, writings, and documents knowing the same to contain a materially false, fictitious, and fraudulent statements and entries, to wit: a Florida Medicaid Provider Enrollment Application, in which **STOREY** falsely attested that **STEPHANIE LYNN FLEMING** (1) had not pled guilty or nolo contendere to a felony, (2) had no disciplinary action taken against any of her business and professional licenses held in Florida and any other state, and (3) had not surrendered a business or professional license in Florida and any other state.

2. In order for **STEPHANIE LYNN FLEMING** to become a provider with WellCare and Prestige so **STEPHANIE LYNN FLEMING** and NFMH could receive claim reimbursements from Medicaid, between in or about March 2016, and in or about March 2017, defendant **STEPHANIE LYNN FLEMING**

made and submitted, and caused to be made and submitted, materially false, fictitious, or fraudulent statements, representations, writings, and documents knowing the same to contain a materially false, fictitious, and fraudulent statements and entries, to wit: a WellCare Provider Agreement and a Beacon Health Strategies Practitioner Network Application, in which **FLEMING** falsely attested that she had not pled guilty or nolo contendere to illegal conduct within the past ten years, and that she had not pled guilty or nolo contendere to a felony.

3. Beginning on or about April 15, 2016, defendants **STEPHANIE LYNN FLEMING** and **HELEN ELIZABETH STOREY** submitted and caused to be submitted claims for payment and reimbursement to Florida Medicaid and its MCOs for psychotherapy, psychiatric diagnostic evaluations, and therapeutic behavioral services that were rendered by **STEPHANIE LYNN FLEMING** when she was ineligible to render such services and to receive Medicaid reimbursement payments.

4. Beginning in or about April 15, 2016, defendants **STEPHANIE LYNN FLEMING** and **HELEN ELIZABETH STOREY** submitted and caused to be submitted false and fictitious claims for payment and reimbursement to Florida Medicaid and its MCOs for psychotherapy, psychiatric diagnostic evaluations, and therapeutic behavioral services that were either not rendered or

were not rendered by the provider whose Medicaid provider ID and name were listed as rendering the services for each claim.

5. To provide written support for these claims, defendants **HELEN ELIZABETH STOREY** and **STEPHANIE LYNN FLEMING** made and caused to be made false and fictitious clinical notes and entries in the patients' charts to reflect psychotherapy, psychiatric diagnostic evaluations, and therapeutic behavioral services being rendered on dates such services were not actually rendered and to reflect services being rendered by a provider who was not the actual provider rendering such services.

6. Defendant **HELEN ELIZABETH STOREY** communicated with N.E.W. using text messaging to discuss and coordinate how false and fraudulent Florida Medicaid claims would be invoiced, and how the proceeds from those claims should be split between defendant **STEPHANIE LYNN FLEMING** and N.E.W.

7. By this conduct, defendants **STEPHANIE LYNN FLEMING** and **HELEN ELIZABETH STOREY** obtained and attempted to obtain more than approximately \$250,000 from Florida Medicaid.

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

COUNTS TWO THROUGH SEVENTY-SIX

A. INTRODUCTION

The allegations contained in sections A and C of Count One are incorporated by reference as if fully set forth herein.

B. THE CHARGE

Between on or about April 15, 2016, and on or about December 31, 2017, in the Northern District of Florida, and elsewhere, the defendants,

STEPHANIE LYNN FLEMING
and
HELEN ELIZABETH STOREY,

did knowingly and willfully execute and attempt to execute a scheme to defraud a health care benefit program, namely, Florida Medicaid and its MCOs, 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 the health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services.

C. EXECUTION OF THE SCHEME

For the purpose of executing this scheme to defraud, the defendants **STEPHANIE LYNN FLEMING** and **HELEN ELIZABETH STOREY** submitted and caused to be submitted fraudulent claims to a health care benefit program, namely, Florida Medicaid through its MCOs, as set forth below:

Count	Date of Service	Claim Date	Patient Initials	Procedure Code	Amount Billed	Rendering Provider	MCO
2	May 2, 2016	on or about June 17, 2016	J.S.	H0031HN	\$48.00	Stephanie Fleming	Prestige
3	May 2, 2016	on or about June 17, 2016	J.S.	H0032	\$97.00	Stephanie Fleming	Prestige
4	May 2, 2016	on or about June 17, 2016	J.S.	H2019HR	\$73.32	Stephanie Fleming	Prestige
5	May 3, 2016	on or about July 8, 2016	S.C.	90791	\$60.00	Stephanie Fleming	CMS
6	May 3, 2016	on or about July 8, 2016	S.C.	90785	\$4.00	Stephanie Fleming	CMS
7	May 3, 2016	on or about July 8, 2016	S.C.	90834	\$60.00	Stephanie Fleming	CMS
8	May 12, 2016	on or about August 31, 2016	W.M.	90791	\$66.83	Stephanie Fleming	WellCare
9	May 12, 2016	on or about August 31, 2016	W.M.	90785	\$2.58	Stephanie Fleming	WellCare
10	May 12, 2016	on or about August 31, 2016	W.M.	90838	\$59.94	Stephanie Fleming	WellCare

11	January 5, 2017	on or about February 8, 2017	B.B.	90837	\$63.96	Stephanie Fleming	WellCare
12	February 10, 2017	on or about March 1, 2017	B.B.	90837	\$63.96	Stephanie Fleming	WellCare
13	February 23, 2017	on or about March 28, 2017	A.L.	90837	\$63.96	Stephanie Fleming	WellCare
14	March 2, 2017	on or about March 28, 2017	A.L.	90837	\$63.96	Stephanie Fleming	WellCare
15	March 2, 2017	on or about May 29, 2017	A.L.	H2019HR	\$63.96	Stephanie Fleming	WellCare
16	April 6, 2017	on or about May 31, 2017	B.D.	90837	\$63.96	Stephanie Fleming	WellCare
17	April 6, 2017	on or about July 17, 2017	B.D.	90837	\$63.96	G.A.G.	WellCare
18	April 17, 2017	on or about May 30, 2017	A.L.	H2019HR	\$63.96	Stephanie Fleming	WellCare
19	April 17, 2017	on or about July 15, 2017	A.L.	H2019HR	\$63.96	G.A.G.	WellCare

20	April 20, 2017	on or about May 31, 2017	B.D.	90837	\$63.96	Stephanie Fleming	WellCare
21	April 20, 2017	on or about July 17, 2017	B.D.	90837	\$63.96	G.A.G.	WellCare
22	April 29, 2017	on or about May 15, 2017	A.H.	H2019HR	\$73.32	Stephanie Fleming	Prestige
23	April 29, 2017	on or about May 15, 2017	A.I.	H2019HR	\$73.32	Stephanie Fleming	Prestige
24	April 29, 2017	on or about May 15, 2017	B.D.	H2019HR	\$73.32	Stephanie Fleming	Prestige
25	April 29, 2017	on or about May 15, 2017	M.D.	H2019HR	\$73.32	Stephanie Fleming	Prestige
26	May 1, 2017	on or about June 5, 2017	A.J.	H2019HR	\$63.96	Stephanie Fleming	WellCare
27	May 1, 2017	on or about July 15, 2017	A.J.	H2019	\$63.96	G.A.G.	WellCare
28	May 1, 2017	on or about May 29, 2017	B.E.	H2019HR	\$63.96	Stephanie Fleming	WellCare

29	May 1, 2017	on or about July 17, 2017	B.E.	H2019	\$63.96	G.A.G.	WellCare
30	May 1, 2017	on or about August 25, 2017	L.J.	H0031HN	\$48.00	G.A.G.	Prestige
31	May 1, 2017	on or about August 25, 2017	L.J.	H0032	\$97.00	G.A.G.	Prestige
32	May 1, 2017	on or about August 25, 2017	L.J.	H2019HR	\$73.32	G.A.G.	Prestige
33	May 1, 2017	on or about June 15, 2017	S.J.	H2019HR	\$63.96	Stephanie Fleming	WellCare
34	May 1, 2017	on or about July 25, 2017	S.J.	H2019	\$63.96	G.A.G.	WellCare
35	May 4, 2017	on or about May 30, 2017	B.B.	H2019HR	\$63.96	Stephanie Fleming	WellCare
36	May 4, 2017	on or about July 17, 2017	B.B.	H2019	\$63.96	G.A.G.	WellCare
37	May 4, 2017	on or about May 31, 2017	B.D.	90837	\$63.96	Stephanie Fleming	WellCare

38	May 4, 2017	on or about July 17, 2017	B.D.	90837	\$63.96	G.A.G.	WellCare
39	May 10, 2017	on or about August 25, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige
40	May 11, 2017	on or about May 30, 2017	B.B.	H2019HR	\$63.96	Stephanie Fleming	WellCare
41	May 11, 2017	on or about July 17, 2017	B.B.	H2019	\$63.96	G.A.G.	WellCare
42	May 11, 2017	on or about May 31, 2017	B.D.	90837	\$63.96	Stephanie Fleming	WellCare
43	May 11, 2017	on or about July 17, 2017	B.D.	90837	\$63.96	G.A.G.	WellCare
44	May 12, 2017	on or about May 29, 2017	A.L.	H2019HR	\$63.96	G.A.G.	WellCare
45	May 15, 2017	on or about June 5, 2017	A.J.	H2019HR	\$63.96	Stephanie Fleming	WellCare
46	May 15, 2017	on or about July 15, 2017	A.J.	H2019	\$63.96	G.A.G.	WellCare

47	May 15, 2017	on or about May 29, 2017	B.E.	H2019HR	\$63.96	Stephanie Fleming	WellCare
48	May 15, 2017	on or about July 17, 2017	B.E.	H2019	\$63.96	G.A.G.	WellCare
49	May 15, 2017	on or about June 14, 2017	G.W.	H2019HR	\$63.96	Stephanie Fleming	WellCare
50	May 15, 2017	on or about May 30, 2017	L.R.	H2019HR	\$63.96	Stephanie Fleming	WellCare
51	May 15, 2017	on or about July 15, 2017	S.J.	H2019HR	\$63.96	Stephanie Fleming	WellCare
52	May 15, 2017	on or about July 25, 2017	S.J.	H2019	\$63.96	G.A.G.	WellCare
53	May 15, 2017	on or about June 14, 2017	T.A.	H2019HR	\$63.96	Stephanie Fleming	WellCare
54	May 15, 2017	on or about May 30, 2017	T.S.	H2019HR	\$63.96	Stephanie Fleming	WellCare
55	May 17, 2017	on or about August 25, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige

56	May 19, 2017	on or about May 29, 2017	A.L.	H2019HR	\$63.96	G.A.G.	WellCare
57	May 25, 2017	on or about July 17, 2017	B.D.	H2019	\$63.96	G.A.G.	WellCare
58	May 26, 2017	on or about July 15, 2017	A.L.	H2019HR	\$63.96	G.A.G.	WellCare
59	June 1, 2017	on or about July 15, 2017	A.L.	H2019	\$63.96	G.A.G.	WellCare
60	June 1, 2017	on or about July 17, 2017	B.D.	H2019	\$63.96	G.A.G.	WellCare
61	June 21, 2017	on or about August 25, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige
62	June 28, 2017	on or about August 25, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige
63	June 28, 2017	on or about August 25, 2017	L.J.	H2019HR	\$73.32	G.A.G.	Prestige
64	July 5, 2017	on or about August 25, 2017	L.J.	H2019HR	\$73.32	G.A.G.	Prestige

65	July 12, 2017	on or about August 25, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige
66	July 12, 2017	on or about August 25, 2017	L.J.	H2019HR	\$73.32	G.A.G.	Prestige
67	July 12, 2017	on or about August 31, 2017	M.F.	H0031HN	\$48.00	G.A.G.	Prestige
68	July 12, 2017	on or about August 31, 2017	M.F.	H0032	\$97.00	G.A.G.	Prestige
69	July 12, 2017	on or about August 31, 2017	M.F.	H2019HR	\$73.32	G.A.G.	Prestige
70	July 26, 2017	on or about August 25, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige
71	August 5, 2017	on or about August 31, 2017	L.P.	H2019HR	\$73.32	Stephanie Fleming	CMS
72	August 14, 2017	on or about September 8, 2017	L.J.	H2019HR	\$73.32	G.A.G.	Prestige
73	August 18, 2017	on or about September 8, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige

74	August 21, 2017	on or about September 8, 2017	L.J.	H2019HR	\$73.32	G.A.G.	Prestige
75	August 25, 2017	on or about September 8, 2017	J.C.	H2019HR	\$73.32	G.A.G.	Prestige
76	August 28, 2017	on or about September 8, 2017	L.J.	H2019HR	\$73.32	G.A.G.	Prestige

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

COUNT SEVENTY-SEVEN

In or about February 2016, in the Northern District of Florida, the defendant,

HELEN ELIZABETH STOREY,

in a matter involving a health care benefit program, namely, Florida Medicaid, and in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, and did make and use a materially false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, to wit: a Florida Medicaid Provider Enrollment Application, in which **STOREY** falsely attested that that **FLEMING** (1) had not pled guilty or nolo contendere to a felony, (2) had no disciplinary action taken against any of her business and professional licenses held in Florida and any other

state, and (3) had not surrendered a business or professional license in Florida and any other state.

In violation of Title 18, United States Code, Section 1035(a)(2).

COUNT SEVENTY-EIGHT

On or about March 19, 2016, in the Northern District of Florida, the defendant,

STEPHANIE LYNN FLEMING,

in a matter involving a health care benefit program, namely, Florida Medicaid, and in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, and did make and use a materially false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, to wit: a WellCare Provider Agreement in which **FLEMING** falsely attested that she had not pled guilty or nolo contendere to illegal conduct within the past ten years, and that she had not pled guilty or nolo contendere to a felony.

In violation of Title 18, United States Code, Section 1035(a)(2).

COUNT SEVENTY-NINE

On or between February 15, 2017, and March 10, 2017, in the Northern District of Florida, the defendant,

STEPHANIE LYNN FLEMING,

in a matter involving a health care benefit program, namely, Florida Medicaid, and in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, and did make and use a materially false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, to wit: a Beacon Health Strategies Practitioner Network Application in which **FLEMING** falsely attested that she had not pled guilty or nolo contendere to illegal conduct within the past ten years, and that she had not pled guilty or nolo contendere to a felony.

In violation of Title 18, United States Code, Section 1035(a)(2) and 2.

COUNT EIGHTY

Between on or about April 15, 2016, and on or about December 31, 2017, in the Northern District of Florida, and elsewhere, the defendants,

STEPHANIE LYNN FLEMING

and

HELEN ELIZABETH STOREY,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit: the name, date of birth, and Medicaid recipient ID number of B.B., B.D., and A.L., during and in relation to a felony violation enumerated in Title 18, United States Code, Sections 1028A(c)(4) and

1028A(c)(5), namely, conspiracy to commit health care fraud and conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of the Indictment, and health care fraud, in violation of Title 18, United States Code, Section 1347, as charged in Counts Two through Seventy-Five of the Indictment.

In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.

COUNT EIGHTY-ONE

Between on or about April 15, 2016, and on or about December 31, 2017, in the Northern District of Florida, and elsewhere, the defendants,

STEPHANIE LYNN FLEMING
and
HELEN ELIZABETH STOREY,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit: the name and Medicaid provider ID number of G.A.G. during and in relation to a felony violation enumerated in Title 18, United States Code, Sections 1028A(c)(4) and 1028A(c)(5), namely, conspiracy to commit health care fraud and conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349 as charged in Count One of the Indictment, and health care fraud, in violation of Title 18, United States Code, Section 1347, as charged in Counts Two through Seventy-Five of the Indictment.

In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.

CRIMINAL FORFEITURE

The allegations contained in Counts Two through Seventy-Nine of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures to the United States pursuant to the provisions of Title 18, United States Code, Section 982(a)(7). Upon the conviction of the violations alleged in Counts Two through Seventy-Nine of this Information, the defendants,

STEPHANIE LYNN FLEMING
and
HELEN ELIZABETH STOREY,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any and all of the defendants' right, title, and interest in any property, real and personal, constituting, and derived from, gross proceeds traceable to such offenses.

If any of the property described above as being subject to forfeiture pursuant to Counts Two through Seventy-Nine of the Indictment, as a result of any act or omission of any defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or

v. has been commingled with other property that cannot be divided
without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the
value of the property subject to forfeiture under the provisions of Title 21, United
States Code, Section 853(p), which is incorporated by reference in Title 18, United
States Code, Section 982.

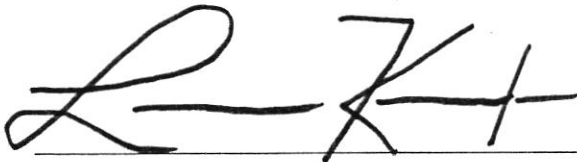
A TRUE BILL:

Redacted

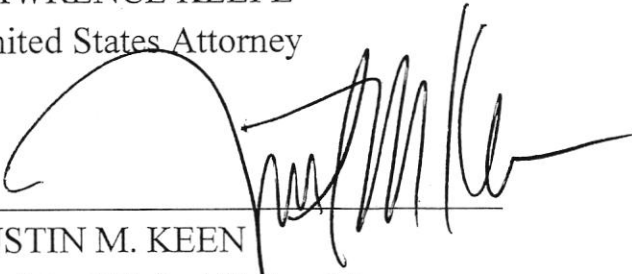
FOREPERSON

9 / 3 / 2019

DATE



LAWRENCE KEEFE
United States Attorney



JUSTIN M. KEEN
Assistant United States Attorney