

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

UNITED STATES OF AMERICA

v.

MELISSA MONIZ
a/k/a Melissa Taylor

~~SEALED~~ *UNsealed 1/30/17*
INDICTMENT

4:17CR4 MW/CAS

THE GRAND JURY CHARGES:

COUNT ONE

A. INTRODUCTION

At all times material to this Indictment:

1. MELISSA MONIZ, a/k/a Melissa Taylor, controlled entities identified as "Billing and Collection Services" and "Billing and Collection Services LLC," which entities purported to handle collection activities.
2. An entity identified as "Billing and Collection Services" was created as a Florida corporation on or about April 18, 2007, but was administratively dissolved by the State of Florida on or about September 26, 2008. During this time, MELISSA MONIZ, a/k/a Melissa Taylor, was listed as the president of Billing and Collection Services.

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dm

3. On June 21, 2013, a fictitious name application was filed with the state of Florida, creating "Billing and Collection Services," with **MELISSA MONIZ's** Marianna, Florida, address listed as the company mailing address and the company owner listed as a corporation owned by **MONIZ's** husband. As part of the fictitious name application, **MONIZ** signed a document filed with the State of Florida cancelling the previous name – "Billing and Collection Services."

4. On or about June 6, 2014, a Florida limited liability company was created in the State of Florida by the mother of **MELISSA MONIZ, a/k/a Melissa Taylor**, in the name of "Billing and Collection Services LLC."

5. Gynecology and Obstetrics Associates, Inc. ("GOA") was located in Tallahassee, Florida, and was a private medical practice specializing in women's healthcare. T.M., the sister of **MELISSA MONIZ, a/k/a Melissa Taylor**, was the office manager for GOA.

6. Jackson County Hospital ("JCH") was located in Marianna, Florida, and provided medical services. Between in or about December 2012 and in or about September 2014, **MELISSA MONIZ, a/k/a Melissa Taylor**, was the director of physician practices for JCH, and part of her duties included the hiring of a collections service for the collection of accounts receivables for the physicians practice section of JCH.

B. THE CHARGE

Between on or about September 1, 2006, and on or about November 21, 2014, in the Northern District of Florida and elsewhere, the defendant,

**MELISSA MONIZ,
a/k/a Melissa Taylor,**

did knowingly and willfully combine, conspire, confederate, and agree with other persons 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

The manner and means by which this conspiracy was committed included the following:

1. **MELISSA MONIZ, a/k/a Melissa Taylor,** used Billing and Collection Services, and Billing and Collection Services LLC (collectively "BCS") as a means to fraudulently obtain money from GOA and JCH.
2. A co-conspirator, GOA's office manager, convinced GOA to hire BCS as a collection service.

3. **MELISSA MONIZ, a/k/a Melissa Taylor**, caused a co-conspirator, GOA's office manager, to issue GOA checks to BCS for collections work that was not performed by BCS. **MONIZ** negotiated each of these checks.

4. For more than four years after BCS was terminated as the collections agent for GOA, a co-conspirator, GOA's office manager, issued GOA checks to entities controlled by **MELISSA MONIZ, a/k/a Melissa Taylor**.

5. A co-conspirator recorded in the GOA records that GOA checks were made payable to "BCBS," so it would falsely appear the checks were being issued to Blue Cross and Blue Shield.

6. **MELISSA MONIZ, a/k/a Melissa Taylor**, negotiated each of the GOA checks that were falsely made payable to "BCBS."

7. In late December 2012, **MELISSA MONIZ, a/k/a Melissa Taylor**, applied to JCH for employment as a physicians practice director. In her application to JCH, **MONIZ** provided false statements concerning her background and medical management experience, including false information about employment, duties, and responsibilities at Tallahassee Memorial Hospital, and false information about employment, duties, and responsibilities at a hospital in south Florida.

8. **MELISSA MONIZ, a/k/a Melissa Taylor**, recommended to JCH that BCS be hired to handle collections activities for accounts receivables for the

physicians practice at JCH, and, based upon her recommendation, JCH contracted with BCS to handle collections activities for JCH.

9. The contract between JCH and BCS was signed on behalf of BCS by **MELISSA MONIZ's** sister, who falsely represented herself to be the president of BCS.

10. **MELISSA MONIZ, a/k/a Melissa Taylor**, failed to advise JCH that she controlled BCS, that she was receiving the checks issued by JCH to BCS, and that the purported president of BCS was her sister.

11. **MELISSA MONIZ, a/k/a Melissa Taylor**, fraudulently received the checks issued by JCH to BCS for alleged collections work and, when her interest in BCS was subsequently discovered by JCH, **MONIZ** made false statements to JCH concerning her relationship with BCS, her interest in BCS, and her relatives' relationship with BCS.

12. To conceal her theft from JCH through BCS, **MELISSA MONIZ, a/k/a Melissa Taylor**, made false statements to JCH and other persons concerning the activities and operation of BCS.

13. By all of the above described conduct, **MELISSA MONIZ, a/k/a Melissa Taylor**, fraudulently obtained approximately \$215,766.68 in funds to which she was not entitled.

14. The conspirators performed acts and made statements to hide and conceal, and cause to be hidden and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

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

COUNTS TWO THROUGH TEN

A. INTRODUCTION

The allegations of Count One are hereby realleged and incorporated by reference as if fully set forth herein.

B. THE CHARGE

Between on or about September 1, 2006, and on or about November 21, 2014, in the Northern District of Florida and elsewhere, the defendant,

MELISSA MONIZ,
a/k/a Melissa Taylor,

did knowingly and willfully 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 for the purpose of executing such scheme, did cause wire communications to be transmitted in interstate commerce.

C. SCHEME TO DEFRAUD

It was part of the scheme to defraud that:

1. **MELISSA MONIZ, a/k/a Melissa Taylor**, used Billing and Collection Services, and Billing and Collection Services LLC (collectively "BCS") as a means to fraudulently obtain money from GOA and JCH.

2. A participant in the scheme, GOA's office manager, convinced GOA to hire BCS as a collection service.

3. **MELISSA MONIZ, a/k/a Melissa Taylor**, caused a participant in the scheme, GOA's office manager, to issue GOA checks to BCS for collections work that was not performed by BCS. **MONIZ** negotiated each of these checks.

4. For more than four years after BCS was terminated as the collections agent for GOA, a participant in the scheme, GOA's office manager, issued GOA checks to entities controlled by **MELISSA MONIZ, a/k/a Melissa Taylor**.

5. A participant in the scheme recorded in the GOA records that GOA checks were made payable to "BCBS," so it would falsely appear the checks were being issued to Blue Cross and Blue Shield.

6. **MELISSA MONIZ, a/k/a Melissa Taylor**, negotiated each of the GOA checks that were made payable to "BCBS."

7. In late December 2012, **MELISSA MONIZ, a/k/a Melissa Taylor**, applied to JCH for employment as a physicians practice director. In her

application to JCH, **MONIZ** provided false statements concerning her background and medical management experience, including false information about employment, duties, and responsibilities at Tallahassee Memorial Hospital, and false information about employment, duties, and responsibilities at a hospital in south Florida.

8. **MELISSA MONIZ, a/k/a Melissa Taylor**, recommended to JCH that BCS be hired to handle collections activities for accounts receivables for the physicians practice at JCH, and, based upon her recommendation, JCH contracted with BCS to handle collections activities for JCH.

9. The contract between JCH and BCS was signed on behalf of BCS by **MELISSA MONIZ's** sister, who falsely represented herself to be the president of BCS.

10. **MELISSA MONIZ, a/k/a Melissa Taylor**, failed to advise JCH that she controlled BCS, that she was receiving the checks issued by JCH to BCS, and that the purported president of BCS was her sister.

11. **MELISSA MONIZ, a/k/a Melissa Taylor**, fraudulently received the checks issued by JCH to BCS for alleged collections work and, when her interest in BCS was subsequently discovered by JCH, **MONIZ** made false statements to JCH concerning her relationship with BCS, her interest in BCS, and her relatives' relationship with BCS.

12. To conceal her theft from JCH through BCS, **MELISSA MONIZ, a/k/a Melissa Taylor**, made false statements to JCH and other persons concerning the activities and operation of BCS.

13. By all of the above described conduct, **MELISSA MONIZ, a/k/a Melissa Taylor**, fraudulently obtained approximately \$215,766.68 to which she was not entitled.

D. WIRE COMMUNICATIONS

On or about the following dates, for the purpose of executing the scheme to defraud, the defendant,

**MELISSA MONIZ,
a/k/a Melissa Taylor,**

knowingly did cause wire communications to be transmitted in interstate commerce as set forth below:

COUNTS	DATE	CHECK AMOUNT	BANK OF DEPOSIT
TWO	March 15, 2012	\$3,102.49	WAMU/JP Morgan
THREE	October 16, 2012	\$3,987.60	WAMU/JP Morgan
FOUR	December 3, 2012	\$3,986.63	WAMU/JP Morgan
FIVE	October 4, 2013	\$3,397.74	Regions Bank
SIX	November 1, 2013	\$6,384.63	Regions Bank
SEVEN	April 4, 2014	\$1,417.75	Regions Bank

EIGHT	May 2, 2014	\$1,384.35	Regions Bank
NINE	September 5, 2014	\$1,700.30	Capital City Bank
TEN	November 21, 2014	\$4,798.39	Capital City Bank

In violation of Title 18, United States Code, Sections 1343 and 2.

CRIMINAL FORFEITURE

The allegations contained in Counts One through Ten of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. From her engagement in the violations alleged in Counts One through Ten of this Indictment, the defendant,

**MELISSA MONIZ,
a/k/a Melissa Taylor,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the defendant's right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offenses.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- 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 subdivided without difficulty,


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

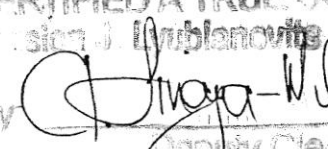
Redacted

1/24/17

DATE


CHRISTOPHER P. CANOVA
United States Attorney


STEPHEN M. KUNZ
Assistant United States Attorney

CERTIFIED A TRUE COPY
by 
J. Lyublanovits
Deputy Clerk