

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 16-
 :
 v. : 18 U.S.C. §§ 1349, and 371
 :
 SHEILA KAHL :
 : INFORMATION
 :

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges that:

1. At all times relevant to this Information:

The Good Samaritans of America

- a. The Good Samaritans of America was a purported non-profit located in Point Pleasant, New Jersey.

- b. SETH REHFUSS resided in Somerset, New Jersey and was the founder of The Good Samaritans of America.

- c. Defendant SHEILA KAHL resided in Point Pleasant, New Jersey, and was a partner of SETH REHFUSS in The Good Samaritans of America.

- d. Through The Good Samaritans of America, SETH REHFUSS, defendant SHEILA KAHL, and others targeted low-income senior citizens and claimed to be “the Trusted Nonprofit” available to assist senior citizens with eligibility for a laundry list of government programs through in person presentations. The Good Samaritans of America promised to help senior

citizens navigate “food allowances, farmers market fresh foods allowance, free cell phone, prescription assistance, utility assistance, dental clinic information, eyeglass voucher, hearing aid scholarship, final wishes and request book and a DNA swab test.” To encourage attendance at events planned at senior centers throughout New Jersey, SETH REHFUSS, defendant SHEILA KAHL, and other representatives of The Good Samaritans of America advertised “free ice cream” for senior citizens who attended.

e. In reality, The Good Samaritans of America was a front for SETH REHFUSS, defendant SHEILA KAHL, and others to defraud the Medicare Program out of more than \$1 million by obtaining DNA samples from senior citizens for unnecessary genetic testing, recruiting and paying healthcare professionals to authorize the unnecessary genetic testing, and ultimately submitting the DNA samples for analysis at laboratories capable of billing Medicare. In doing so, SETH REHFUSS, defendant SHEILA KAHL, and others wrongfully accessed individually identifiable health information of the senior citizens, in the form of the results of the genetic testing in order to effectuate the scheme.

The Medicare Program

2. The Medicare program is a federal program established by the Social Security Act of 1965 (codified as amended in various sections of Title 42, United States Code) to provide medical services, medical equipment, and supplies to aged, blind, and disabled individuals who qualify under the Social Security Act (hereinafter "beneficiaries"). The Medicare Part B program is a