

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION  
JUNE 26, 2018 SESSION

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

JUN 26 2018

JULIA C. DUDLEY, CLERK  
BY:   
DEPUTY CLERK

UNITED STATES OF AMERICA )

v. )

EAST MENTAL HEALTH, LLC, )  
CHRISTOPHER DEAN EAST, )  
JOANN KATHLEEN PATTERSON, )  
ALFRED LLOYD ROBRECHT, )  
WILLIAM BARCLAY ALLISON, and )  
RYAN THOMAS GREENE, )

Defendants. )

Criminal No. 718CR27

All in violation of:

18 U.S.C. § 1349

18 U.S.C. § 1347

18 U.S.C. § 2

SEALED INDICTMENT

**INTRODUCTION**

At all times material to this Indictment:

**The Defendants**

1. **EAST MENTAL HEALTH, LLC**, also known as the **EAST WELLNESS CENTER**, (“**EAST MENTAL HEALTH**”) was a Virginia limited liability corporation, formed on or about November 30, 2006, under State Corporation Commission number S2058149. **EAST MENTAL HEALTH**'s principal place of business was located at 3441 Brandon Avenue, Suite 100, Roanoke, Virginia 24018, which is in the Western District of Virginia. **EAST MENTAL HEALTH** was previously located on Sunnyside Drive and later Colonial Avenue, both in Roanoke, Virginia.

2. From on or about August 16, 2010 through on or about October 17, 2017, **EAST MENTAL HEALTH** operated a satellite location in Rocky Mount, Virginia (the “Rocky Mount location”), which is also in the Western District of Virginia.

3. **CHRISTOPHER DEAN EAST** was the owner and registered agent of **EAST MENTAL HEALTH** at all times during **EAST MENTAL HEALTH**’s operation. **CHRISTOPHER DEAN EAST** resided in the Roanoke area of the Western District of Virginia.

4. **JOANN KATHLEEN PATTERSON** was employed by **EAST MENTAL HEALTH** from on or about August 22, 2007 through October 17, 2017, and served as its Executive Director. She resided in the Roanoke area of the Western District of Virginia.

5. **ALFRED LLOYD ROBRECHT** was employed by **EAST MENTAL HEALTH** from on or about August 20, 2007 through October 17, 2017, and served as its Clinical Director. He resided in the Roanoke area of the Western District of Virginia.

6. **WILLIAM BARCLAY ALLISON** was employed by **EAST MENTAL HEALTH** from on or about February 19, 2008 through October 17, 2017, and served as its Administrative Director. He resided in the Roanoke area of the Western District of Virginia.

7. **RYAN THOMAS GREENE** was employed by **EAST MENTAL HEALTH** from on or about November 17, 2008 through October 17, 2017, and served as a Team Leader. He resided in the Roanoke area of the Western District of Virginia.

## The Virginia Medicaid Program

8. Medicaid is a federally-funded program that provides health care to poor and indigent persons. The U.S. Department of Health and Human Services (“HHS”) and the Commonwealth of Virginia, Department of Medical Assistance Services (“DMAS”), administer and supervise the Medicaid program in Virginia. The United States Government contributes at least fifty percent of the cost of the Medicaid program, with the remaining monies provided by the Commonwealth of Virginia.-

9. Medicaid has established procedures in accordance with the HHS regulations to compensate health care providers for services provided to Medicaid recipients. An organization can be a participating provider if it has a valid participation agreement with Medicaid (DMAS) agreeing that it will: (1) provide the service, (2) submit an accurate claim, and (3) accept as payment in full the amount paid by Medicaid.

10. Medicaid will only pay for services that are medically necessary and meet established rules and regulations. Providers are responsible for reading and adhering to the policies and regulations explained in the Medicaid Provider Manuals. Providers agree to follow these rules and regulations and only submit claims for services they actually provide to the Medicaid recipient. In their Medicaid participation agreements, providers agree to keep such records as are necessary to fully disclose the services provided to Medicaid recipients, and to furnish such information to Medicaid upon request. Providers agree to render and perform services that are in accordance with federal and state law, as well as Medicaid regulations. Providers agree to only submit claims to Medicaid that comply with its rules and regulations.

11. Pursuant to federal regulations, Medicaid authorizes periodic audits of its providers, such as **EAST MENTAL HEALTH**. The Medicaid provider is responsible for ensuring that all requirements for services rendered have been met in order to submit claims and receive payment from Medicaid. The Medicaid provider agrees to furnish Medicaid with access to all records and the business facility in order to conduct the audit.

12. Mental Health Support Services (“MHSS”) and Psychosocial Rehabilitation Services (“PSR”) are among the many mental health service programs offered by Medicaid in Virginia. The purpose of these services is to support and assist adults and adolescents with severe mental illness and learning disability. Medicaid requires its providers to prepare an Individualized Service Plan (“ISP”) for each recipient who receives mental health services. The ISP is sometimes referred to as the treatment plan. The ISP is a comprehensive and regularly updated document specific to the recipient receiving treatment, and is designed to make sure the treatments or training provided are meeting the individual’s specific needs, goals and measurable objectives. Medicaid services must be provided in accordance with the ISP.

#### **Mental Health Support Services (MHSS)**

13. The intent of MHSS is to provide goal-directed interventions and give training to individuals who have severe, chronic mental illnesses or emotional disturbances so that they can reside independently in their communities in the least restrictive environment. The MHSS service is designed to train individuals in activities of daily living, to use of community resources, to improve behaviors related to health, safety, nutrition, physical condition, and medication adherence. The goal of MHSS is for

recipients to achieve and maintain community stability and independence. MHSS is an individualized service.

14. Medicaid regulations state that only “direct face-to-face contacts and services to an individual shall be reimbursable” as MHSS. The provider must truthfully document the MHSS for a given Medicaid recipient through notes of the services provided. Providers will be reimbursed only where services meet the service definition, service eligibility, service provision criteria, and guidelines as described in the regulations in the Medicaid Provider Manual.

15. Medicaid regulations establish a payment structure for MHSS in terms of units rather than hours. Medicaid reimburses MHSS providers at a specific rate of \$91 per unit. For rural areas, Medicaid reimburses MHSS providers at a rate of \$83 per unit. The Medicaid unit-to-hour reimbursement structure for MHSS is as follows:

- a. One unit = 1 to 2.99 hours per day;
- b. Two units = 3 to 4.99 hours per day;
- c. Three units = 5 to 6.99 hours per day; and
- d. Four units = 7 or more hours per day.

#### **Psychosocial Rehabilitation Services (PSR)**

16. PSR is a Medicaid service provided to groups of individuals in a non-residential setting. Services include assessment, education about the diagnosed mental illness and appropriate medications to avoid complication and relapse, and opportunities to learn and use independent living skills and enhance social and interpersonal skills within a supportive and normalizing program structure and environment.

17. Medicaid regulations establish a payment structure for PSR in terms of units rather than hours. Medicaid reimburses PSR providers at a specific rate of \$24.23 per unit. There is no separate rural rate for PSR. The Medicaid unit-to-hour reimbursement structure for PSR is as follows:

- a. One unit = 2 to 3.99 hours per day;
- b. Two units = 4 to 6.99 hours per day; and
- c. Three units = 7 or more hours per day.

18. The MHSS rate of reimbursement is significantly higher than the PSR rate because the complexity level of MHSS is higher than that of PSR. MHSS is an individualized service whereas PSR services are provided to multiple clients simultaneously in a group setting.

### **COUNT ONE**

#### **Conspiracy to Commit Health Care Fraud - 18 U.S.C. § 1349**

The Grand Jury charges:

1. Paragraphs 1 through 18 of the Introduction section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From in or around at least July 2007, and continuing through on or about the date of this Indictment, in the Western District of Virginia and elsewhere, the defendants,

**EAST MENTAL HEALTH, LLC  
CHRISTOPHER DEAN EAST  
JOANN KATHLEEN PATTERSON  
ALFRED LLOYD ROBRECHT  
WILLIAM BARCLAY ALLISON  
and  
RYAN THOMAS GREENE**

did willfully and knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, that is to knowingly and willfully execute a scheme and artifice 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 affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicaid, 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.

### **PURPOSE OF THE CONSPIRACY**

3. Among others, it was a purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich **EAST MENTAL HEALTH** and themselves, and others by, among other things: (a) submitting and causing the submission of false and fraudulent claims to Medicaid through **EAST MENTAL HEALTH** for services that were not eligible for Medicaid reimbursement as submitted, and that, in many instances, were either not provided in accordance with Medicaid rules and regulations or were not provided at all; and (b) concealing the submission of false and fraudulent claims to Medicaid by falsifying records and documentation required for reimbursement under federal law and Medicaid rules and regulations.

### **MANNER AND MEANS OF THE CONSPIRACY**

4. From in or around July 2007 through October 2017, the manner and means by which **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM**

**BARCLAY ALLISON, RYAN THOMAS GREENE**, and their co-conspirators sought to accomplish the objects and purposes of the conspiracy included the following:

- a. knowingly submitting or causing the submission of false claims to Medicaid, which fraudulently represented that clients received individualized MHSS service when, in fact, the purported services constituted no more than PSR or other social or recreational group activities instead of individualized MHSS service;
- b. creating or causing the creation of materially false progress notes and other records to conceal that multiple clients were provided service in groups, as opposed to individualized service by, among other things: (1) directing clinicians to falsely complete progress notes or other records for services never rendered as required; (2) apportioning the overall service time among clients who were provided services in a group to make it appear as though clients received individualized MHSS service (i.e. “stacking” clients); (3) documenting service times in progress notes to make it appear as though clinicians had travel time between each client and that each client received individual MHSS service; and (4) deliberately omitting certain words, such as “groups,” from progress notes;
- c. knowingly submitting or causing the submission of claims to Medicaid for PSR services that were rendered at **EAST MENTAL HEALTH**’s unlicensed Rocky Mount location;



- d. creating or causing the creation of materially false records to deceive Medicaid auditors as to the true nature of record keeping practices at **EAST MENTAL HEALTH** and to justify its claims submitted to Medicaid; and
- e. implementing policies and procedures which resulted in PSR clinicians submitting false documents to support claims for the provision of two Medicaid services to different clients at the same time (overlapping or double billing):

5. **CHRISTOPHER DEAN EAST** formed **EAST MENTAL HEALTH** as a company registered in the State of Virginia in 2006.

6. On July 1, 2007, **CHRISTOPHER DEAN EAST**, on behalf of **EAST MENTAL HEALTH**, entered into a Medicaid Participation Agreement to obtain a provider number in order to provide services and submit claims to Medicaid for mental health services. Therein, **CHRISTOPHER DEAN EAST** certified that he agreed to, among other things, comply with all state and federal laws and regulations as well as applicable policies and procedures of the Medicaid Program.

7. From July 1, 2007 to October 17, 2017, **EAST MENTAL HEALTH** was licensed to provide individualized MHSS service at its Roanoke, Virginia location. The Roanoke location was issued a license to provide PSR service in July of 2012. **EAST MENTAL HEALTH**'s satellite office in Rocky Mount, Virginia was licensed to provide individualized MHSS service but was never licensed to provide reimbursable PSR service.

8. To provide MHSS service, a clinician must have specific qualifications as required by Medicaid. A qualified clinician must be at least a Licensed Mental Health Professional ("LMHP") or a Qualified Mental Health Professional ("QMHP"). A LMHP

is an individual licensed in Virginia as a physician, a clinical psychologist, a professional counselor, a clinical social worker, or a psychiatric clinical nurse specialist. A QMHP is a clinician in the human services field who is trained and experienced in providing psychiatric or mental health services to individuals who have a primary or secondary psychiatric diagnosis.

9. **EAST MENTAL HEALTH** and **CHRISTOPHER DEAN EAST** hired mental health clinicians to provide direct services to **EAST MENTAL HEALTH's** clients. From the inception, clinicians were hired to provide individualized MHSS services. After **EAST MENTAL HEALTH** received its PSR license at the Roanoke location in July 2012, clinicians were hired to provide PSR group services.

10. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON,** and **RYAN THOMAS GREENE** at all times knew that claims submitted to Medicaid for mental health services must be supported by accurate documentation. Such documentation includes progress notes, which must accurately reflect, among other things, the client to whom mental health services were provided, the true nature and details of the services provided, the time of the services provided, and the clinician who provided the service.

11. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON,** and **RYAN THOMAS GREENE** knew that the claims

submitted to, and reimbursed by, Medicaid would be based upon the information reflected in the progress notes and other documents completed by clinicians.

12. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, WILLIAM BARCLAY ALLISON,** and others knew that any **EAST MENTAL HEALTH** location must be a licensed location to provide a specific service before any such service could be rendered and a subsequent claim submitted to Medicaid for reimbursement.

13. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON,** and **RYAN THOMAS GREENE** at all times knew that Medicaid required MHSS services be individualized services. That is, MHSS was to be provided by one clinician to one client at a time. Likewise, **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON,** and **RYAN THOMAS GREENE** knew that PSR was intended to be a group-oriented service. That, is PSR service was to be provided by one or more clinicians to multiple clients at a time.

14. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON,** and **RYAN THOMAS GREENE** at all times knew that Medicaid reimbursed for individualized MHSS service at a significantly higher rate of reimbursement than the rate of reimbursement for PSR group services.

15. Despite knowing and understanding the Medicaid rules and regulations for reimbursable mental health services, **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, RYAN THOMAS GREENE**, and others implemented a number policies and practices that violated federal law and Medicaid rules and regulations in order to “maximize revenue” at **EAST MENTAL HEALTH**.

16. Through the implementation of these policies and practices, **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, RYAN THOMAS GREENE**, and others falsified or caused to be falsified records, specifically progress notes and other documents that contained materially false, fraudulent and misleading representations and omissions that were used to support fraudulent claims submitted to Medicaid for reimbursement.

**Fraudulent Medicaid MHSS Billing for Group Activities**

17. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, RYAN THOMAS GREENE**, and others directed clinicians to provide service to multiple clients at the same time and create false progress notes and other records indicating that clients received MHSS service individually when, in fact, the clients did not.

18. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST**, and others directed the creation of group activities to be held at **EAST MENTAL HEALTH** under

the name "OASIS." These defendants and others directed clinicians to bring multiple clients at the same time to the OASIS group activities and to create false and misleading records stating that each client received individualized MHSS service, when in fact, the clients did not. These defendants knew that these false records would be used to support fraudulent claims to be submitted to Medicaid for reimbursement.

19. **EAST MENTAL HEALTH** and **CHRISTOPHER DEAN EAST** imposed a MHSS unit billing quota for MHSS units upon managers, including **JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, RYAN THOMAS GREENE**, and others. On numerous occasions, managers billed for services that were not provided or did not qualify for reimbursement under Medicaid rules and regulations.

20. For example, after certain group events, such as the **EAST MENTAL HEALTH** Valentine's Day party and Halloween Party, emails were circulated to managers advising that specific clients had MHSS hours/units "open to bill" for the event. These emails solicited and/or assigned managers to create false progress notes for MHSS services that the managers allegedly provided at the previously-held events. As a result, managers would falsify records indicating that they provided individualized MHSS services to clients when, in many instances, they did not.

21. At **EAST MENTAL HEALTH** each of the defendants knew that clinicians routinely transported multiple clients at one time to participate in community outings or activities (such as grocery shopping, YMCA visits, etc.) and submitted false documentation indicating that each client received individualized MHSS services. Each of the defendants

directed clinicians to conceal the fact that multiple clients received service at the same time by, among other things, avoiding use of words such as “groups.” In fact, the **EAST MENTAL HEALTH** employee handbook provided such direction. The defendants knew this false documentation would be, and in fact was, used to support false claims to Medicaid.

22. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, and RYAN THOMAS GREENE** advised clinicians, when providing services to multiple clients at one time, to fraudulently apportion the overall service time among each client and “stack” the time for each client, one after another, to make it appear as though each client received MHSS services individually. Recognizing that “stacked” service times (i.e. one service time immediately after the other) might arouse Medicaid suspicion, **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, and RYAN THOMAS GREENE** directed clinicians to document MHSS service times in progress notes to make it appear as though clinicians had travel time between ending MHSS service with one client and beginning MHSS service with another.

**Fraudulent MHSS Billing During PSR Groups**

23. Beginning in April 2014, **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, and JOANN KATHLEEN PATTERSON** initiated a policy requiring the PSR clinicians to bill not only for PSR services, but to also bill for individualized MHSS

services during PSR group activities. That is, PSR clinicians would determine which clients they would bill for PSR and which clients they would bill for MHSS, even though all clients attended the same PSR group activity.

24. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, WILLIAM BARCLAY ALLISON, and RYAN THOMAS GREENE**, and others knew that the PSR clinicians would create false records, such as progress notes, to indicate that they provided individualized MHSS services to some clients when, in fact, they all attended the PSR activity. These false progress notes often caused conflicting records, generally referred to as “overlaps,” between and among clinicians. In some instances, clinicians would create conflicting records indicating different clinicians provided services to the same client at the same time. In other instances, one clinician would create conflicting records that indicated he or she provided services to multiple clients at the same time and that at least one of those clients was receiving individualized MHSS service during the group activities.

25. When the overlapping service times were discovered, **EAST MENTAL HEALTH and WILLIAM BARCLAY ALLISON** notified **RYAN THOMAS GREENE** and others to change or directed clinicians to change MHSS service times, or approved the change to service times, so that the records would no longer conflict. At all times **EAST MENTAL HEALTH, JOANN KATHLEEN PATTERSON, WILLIAM BARCLAY ALLISON, and RYAN THOMAS GREENE** knew that these false and fraudulent progress notes and other records did not accurately reflect the nature of the services provided, the time the services were provided, or the clinician who purportedly

provided any such service. These false documents were used to support fraudulent claims submitted to, and reimbursed by, Medicaid.

**Fraudulent PSR Billing At the Unlicensed Rocky Mount Location**

26. Knowing that their request for a PSR license for the **EAST MENTAL HEALTH** Rocky Mount location had been denied by the state licensing agency, **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT**, and others submitted and caused the submission of claims to Medicaid for PSR services rendered at its unlicensed Rocky Mount location.

27. In order to conceal that PSR was being conducted at an unlicensed location, clinicians created false progress notes and other records to be falsified by omitting any references to the Rocky Mount location.

**Fraudulent Records Created and Submitted to Auditors**

28. In or about August 2011, **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, RYAN THOMAS GREENE**, and others became aware that Medicaid would conduct an audit of **EAST MENTAL HEALTH's** records, including client files. **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON**, and **RYAN THOMAS GREENE** also became aware that many client files did not contain adequate documentation, such as progress notes, to support claims to, and payments from, Medicaid.



29. **EAST MENTAL HEALTH, RYAN THOMAS GREENE**, and others directed multiple clinicians to fraudulently create progress notes, supervision notes, and other documents to detail services purportedly provided up to two years previously.

30. **EAST MENTAL HEALTH, RYAN THOMAS GREENE**, and others concealed the fact that records were created and backdated for inclusion in client files in order to deceive Medicaid auditors as to the true nature of **EAST MENTAL HEALTH's** recordkeeping practices and justify the fraudulent claims submitted to Medicaid.

31. The false and fraudulent claims submitted by **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, ALFRED LLOYD ROBRECHT, WILLIAM BARCLAY ALLISON, RYAN THOMAS GREENE** caused Medicaid a loss of as much as \$45 million.

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

**COUNTS TWO THROUGH SEVENTY-THREE**  
**Health Care Fraud - 18 U.S.C. §§1347 and 2**

The Grand Jury charges:

1. Paragraphs 1 through 18 of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.
2. In or about 2014 and 2015, as part of a scheme to falsely obtain funds from Medicaid, the defendants, **EAST MENTAL HEALTH, LLC, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, WILLIAM BARCLAY ALLISON, and RYAN THOMAS GREENE** knowingly caused, and aided and abetted, the submission of false claims to Medicaid seeking reimbursement for two separate services, that is the individualized MHSS service and the group PSR service, allegedly provided by the same clinician at the same time.

**Purpose of the Scheme and Artifice**

3. It was a purpose of the scheme for **EAST MENTAL HEALTH, CHRISTOPHER DEAN EAST, JOANN KATHLEEN PATTERSON, WILLIAM BARCLAY ALLISON, RYAN THOMAS GREENE,** and others known and unknown, to unlawfully enrich and benefit **EAST MENTAL HEALTH** and themselves.
4. The factual allegations in Paragraphs 1 through 31, and specifically paragraphs 23 through 25, of Count One are re-alleged and incorporated by reference as if fully set forth herein.
5. **EAST MENTAL HEALTH** and other defendants put into place policies and procedures that required PSR clinicians to bill for a specific number of units of MHSS

service. These policies and procedures resulted in the submission of false claims to Medicaid for reimbursement for multiple clinicians claiming provision of two Medicaid services at the same time. Counts Two through Seventy-Three below describe this overlapping, or double, false billing for two Medicaid services.

**Acts in Execution or Attempted Execution of the Scheme and Artifice**

6. On or about the dates specified in each count below, in the Western District of Virginia, and elsewhere,

**EAST MENTAL HEALTH, LLC  
CHRISTOPHER DEAN EAST  
JOANN KATHLEEN PATTERSON  
WILLIAM BARCLAY ALLISON  
and  
RYAN THOMAS GREENE**

did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice, described in Paragraphs 23 through 25 of Count One of this Indictment, 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 affecting commerce, as defined in Title 18, United States Code, Section 24(b), in connection with the delivery of and payment for health care benefits, items, and services, in the execution of the scheme, that is, the defendants aided and abetted each other in submitting and causing the submission of false and fraudulent claims to Medicaid for mental health services by the staff member identified, for the clients identified, for the times of service, and service billed as described below:

<b>COUNT</b>	<b>DATE</b>	<b>STAFF MEMBER</b>	<b>CLIENT</b>	<b>TIME OF SERVICE</b>	<b>SERVICE BILLED</b>
<b>C. B.</b>					
2	4/3/14	C. B.	LSHA	9:00-12:00	MHSS
			KQUE	10:00-2:00	PSR
			AMEA	10:30-11:30	PSR
			ASTA	10:00-12:00	PSR
3	4/15/14	C. B.	KMAX	9:00-10:00	MHSS
			MDRA	9:00- 4:00	PSR
			ASTA	9:00-11:00	PSR
4	4/25/14	C. B.	NALA	12:00-1:00	MHSS
			LLEE	12:00-2:00	PSR
5	5/8/14	C. B.	KMAX	10:00-11:00	MHSS
			WREA	10:00-2:00	PSR
6	6/5/14	C. B.	APRO	10:00-11:00	MHSS
			ASTA	10:00-2:00	PSR
			ATRE	10:00-2:00	PSR
			KQUE	10:00-2:00	PSR
			PMCG	10:00-2:00	PSR
			RREN	10:00-2:00	PSR
7	6/17/14	C. B.	GGUT	9:00-11:00	MHSS
			RREN	9:00-1:00	PSR
			PCOO	9:00-11:00	PSR
			ASTA	9:00-1:00	PSR

8	6/25/14	C. B.	HDEA	9:00-10:00	MHSS
			ASTA	9:00-1:00	PSR
			RREN	9:00-1:00	PSR
9	6/30/14	C. B.	BPOW	9:00-11:00	MHSS
			RREN	9:00-1:00	PSR
10	7/17/14	C. B.	DOMAR	3:00-6:00	MHSS
			RREN	9:00-4:00	PSR
			ASTA	9:00-4:00	PSR
11	8/22/14	C. B.	LSHA	9:00-11:00	MHSS
			RREN	9:00-1:00	PSR
12	9/4/14	C. B.	DOMAR	11:30-2:30	MHSS
			RREN	10:00-2:00	PSR
13	12/18/14	C. B.	MHEN	8:30-11:30	MHSS
			RREN	10:00-2:00	PSR
<b>M. B.</b>					
14	12/8/14	M. B.	CCRA	9:00-11:00	MHSS
			JPAN	9:00-1:00	PSR
15	12/9/14	M. B.	PCOO	9:00-10:00	MHSS
			BOWE	9:00-1:00	PSR
			JPAN	9:00-1:00	PSR

16	12/11/14	M. B.	HDEA	12:00-1:30	MHSS
			MLEI	10:00-2:00	PSR
			BOWE	10:00-2:00	PSR
17	12/16/14	M. B.	BPOW	10:00-12:00	MHSS
			BOWE	9:00-1:00	PSR
			JPAN	9:00-1:00	PSR
			MLEI	9:00-1:00	PSR
18	12/22/14	M. B.	CCRA	9:00-12:00	MHSS
			BOWE	9:00-1:00	PSR
			JPAN	9:00-1:00	PSR
			RWRI	9:00-1:00	PSR
<b>A. C.</b>					
19	4/3/14	A.C.	PCOO	11:00-1:00	MHSS
			AHUG	11:00-1:00	PSR
20	4/4/14	A. C.	MAND	9:00-10:00	MHSS
			AHUG	9:00-1:00	PSR
21	4/7/14	A. C.	PCOO	9:00-10:00	MHSS
			PCOO	12:30-1:30	MHSS
			AHUG	9:00-1:00	PSR
22	4/9/14	A. C.	TAKI	9:00-11:00	MHSS
			AHUG	9:00-1:00	PSR
23	4/11/14	A. C.	MAND	9:00-12:00	MHSS
			AHUG	9:00-1:00	PSR

24	4/15/14	A. C.	MAND PCOO  NKAR MAND CHAM AWIL JGRA WHAM RTAB AHUG	9:00-11:00 11:00-1:00  9:00-4:00 11:00-1:00 9:00-1:00 9:00-1:00 9:00-1:00 9:00-1:00 11:00-1:00 9:00-1:00	MHSS MHSS  PSR PSR PSR PSR PSR PSR PSR PSR
25	4/16/14	A. C.	PCOO  AHUG RTAB JGRA DADK MAND	10:00-11:00  9:00-1:00 9:30-1:30 9:00-1:00 10:00-12:00 9:00-1:00	MHSS  PSR PSR PSR PSR PSR
26	4/17/14	A. C.	TAKI  RHAM JGRA NKAR CHAM AHUG	11:00-1:00  10:00-2:00 10:00-2:00 10:00-2:00 10:00-2:00 10:00-2:00	MHSS  PSR PSR PSR PSR PSR
27	4/23/14	A. C.	TAKI  AHUG	9:00-11:00  9:00-1:00	MHSS  PSR
28	4/24/14	A. C.	VTHO  AHUG	10:00-12:00  10:00-2:00	MHSS  PSR
29	6/23/14	A. C.	AWIL  NSMI	9:00-11:00  9:00-1:00	MHSS  PSR

30	7/17/14	A. C.	JOVE NKAR  BHAR	<b>9:00-12:00</b> <b>1:00-3:00</b>  <b>9:00-4:00</b>	MHSS MHSS  PSR
31	8/14/14	A. C.	AWIL JOVE  AHUG	<b>2:00-3:00</b> <b>3:00-4:00</b>  <b>9:00-4:00</b>	MHSS MHSS  PSR
32	12/16/14	A. C.	KMAX  CHAM AHUG MAND DWIL JGRA	<b>12:00-1:00</b>  <b>9:00-1:00</b> <b>9:00-1:00</b> <b>9:00-1:00</b> <b>9:00-1:00</b> <b>9:00-1:00</b>	MHSS  PSR PSR PSR PSR PSR
33	12/18/14	A. C.	JKID  KQUE MDRA JGRA DWIL NKAR AHUG CHAM	<b>10:00-1:00</b>  <b>10:00-2:00</b> <b>10:00-2:00</b> <b>10:00-2:00</b> <b>10:00-2:00</b> <b>10:00-2:00</b> <b>10:00-2:00</b>	MHSS  PSR PSR PSR PSR PSR PSR PSR
34	12/22/14	A. C.	PCOO  KQUE CHAM	<b>9:00-10:00</b>  <b>9:00-1:00</b> <b>9:00-1:00</b>	MHSS  PSR PSR
35	12/26/14	A. C.	CCRA  JРАН DWIL	<b>9:00-10:00</b>  <b>9:00-1:00</b> <b>9:00-1:00</b>	MHSS  PSR PSR



36	12/30/14	A. C.	HDEA	9:00-12:00	MHSS
			BOWE	9:00-1:00	PSR
			DWIL	9:00-1:00	PSR
			DADK	9:00-1:00	PSR
			RTAB	9:00-1:00	PSR
			AHUG	9:00-1:00	PSR
			CHAM	9:00-1:00	PSR
CCRA	9:00-1:00	PSR			
37	12/31/14	A. C.	AWIL	9:00-10:00	MHSS
			BOWE	9:00-1:00	PSR
			DADK	9:00-1:00	PSR
			HDEA	9:00-11:00	PSR
CCRA	9:00-1:00	PSR			
38	2/9/15	A. C.	PCOO	9:00-11:00	MHSS
			WHAM	9:00-1:00	PSR
			JGRA	9:00-1:00	PSR
			AHUG	9:00-1:00	PSR
MAND	9:00-1:00	PSR			
39	2/11/15	A. C.	MAND	9:00-1:00	MHSS
			NKAR	9:00-1:00	PSR
			DWIL	10:30-12:30	PSR
			MAND	9:00-4:00	PSR
			JGRA	9:00-4:00	PSR
AHUG	9:00-4:00	PSR			
40	2/12/15	A. C.	HDEA	10:00-1:00	MHSS
			NKAR	10:00-2:00	PSR
			DWIL	10:45-12:45	PSR
			JGRA	10:00-2:00	PSR
			AHUG	10:00-2:00	PSR
CHAM	10:00-2:00	PSR			

41	2/19/15	A. C.	CCRA	12:00-2:00	MHSS
			CHAM	10:00-2:00	PSR
			NKAR	10:00-2:00	PSR
42	2/20/15	A. C.	MAND	11:00-1:00	MHSS
			NKAR	9:00-1:00	PSR
<b>L. C.</b>					
43	8/18/14	L. C.	JHOP	10:00-1:00	MHSS
			NSMI	9:00-1:00	PSR
44	10/22/14	L. C.	HDEA	11:30-1:00	MHSS
			NSMI	9:00-1:00	PSR
			MLEI	9:00-1:00	PSR
			JWAT	9:00-1:00	PSR
			ASTA	9:00-1:00	PSR
			MDRA	9:00-1:00	PSR
45	10/22/14	L. C.	CCRA	8:30-10:00	MHSS
			CCRA	1:00-1:30	MHSS
			NSMI	9:00-1:00	PSR
			MLEI	9:00-1:00	PSR
			JWAT	9:00-1:00	PSR
			ASTA	9:00-1:00	PSR
46	10/23/14	L. C.	PCOO	10:00-11:00	MHSS
			EROB	10:00-2:00	PSR
			MDRA	10:00-2:00	PSR
			BHAR	10:00-12:00	PSR
			ASTA	10:00-2:00	PSR

47	10/23/14	L. C.	BHAR	12:00-1:00	MHSS
			EROB	10:00-2:00	PSR
			PCOO	12:00-2:00	PSR
			ASTA	10:00-2:00	PSR
			MDRA	10:00-2:00	PSR
48	11/19/14	L. C.	PCOO	12:00-1:00	MHSS
			NSMI	9:00-1:00	PSR
			MLEI	9:00-1:00	PSR
			ASTA	9:00-1:00	PSR
			MDRA	9:00-1:00	PSR
CKEI	9:00-1:00	PSR			
49	11/25/14	L. C.	WHAM	9:00-11:00	MHSS
			MDRA	9:00-1:00	PSR
			ASTA	9:00-1:00	PSR
DSMI	9:00-1:00	PSR			
50	11/26/14	L. C.	CCRA	10:30-12:00	MHSS
			MLEI	9:00-1:00	PSR
			ASTA	9:00-1:00	PSR
NSMI	9:00-1:00	PSR			
51	12/3/14	L. C.	AWIL	12:00-1:00	MHSS
			NSMI	9:00-1:00	PSR
			MDRA	9:00-1:00	PSR
ASTA	9:00-1:00	PSR			
52	12/4/14	L. C.	EROB	10:00-1:00	MHSS
			KQUE	10:00-2:00	PSR
			ASTA	10:00-2:00	PSR
			MDRA	10:00-2:00	PSR
PCOO	10:00-2:00	PSR			

53	12/8/14	L. C.	PCOO KQUE JHOP NSMI	9:00-12:00 9:00-1:00 9:00-11:00 9:00-1:00	MHSS PSR PSR PSR
54	12/10/14	L. C.	PCOO ASTA NSMI MDRA	9:00-10:00 9:00-1:00 9:00-1:00 9:00-1:00	MHSS PSR PSR PSR
55	12/17/14	L. C.	PCOO ASTA MDRA NSMI	9:00-10:00 9:00-1:00 9:00-1:00 9:00-1:00	MHSS PSR PSR PSR
56	12/29/14	L. C.	CCRA NSMI JLAN ETAY PCOO	9:00-12:00 9:00-1:00 9:00-1:00 9:00-1:00 9:00-1:00	MHSS PSR PSR PSR PSR
57	3/30/15	L. C.	CSTE NSMI KQUE	10:30-12:30 9:00-1:00 9:00-1:00	MHSS PSR PSR
<b>K. G.</b>					
58	5/19/14	K. G.	BPOW FDEL	9:00-10:00 9:00-1:00	MHSS PSR
59	5/19/14	K. G.	EROB FDEL GSMI	11:00-1:00 9:00-1:00 10:00-12:00	MHSS PSR PSR

60	6/23/14	K. G.	CTHO	11:00-1:00	MHSS
			FDEL	9:00-1:00	PSR
			BVIE	9:00-4:00	PSR
61	6/24/14	K. G.	BPOW	9:00-11:00	MHSS
			FDEL	9:00-1:00	PSR
			BPOW	9:00-1:00	PSR
62	7/3/14	K. G.	KMAX	12:00-3:00	MHSS
			PCOO	10:00-2:00	PSR
			MAND	10:00-2:00	PSR
			ASTA	10:00-2:00	PSR
			PMCG	10:00-2:00	PSR
			EROB	10:00-2:00	PSR
63	7/7/14	K. G.	BPOW	11:00-1:00	MHSS
			BVIE	9:00-1:00	PSR
				(time chg. 8:30-12:30)	PSR
64	7/9/14	K. G.	BPOW	11:00-1:00	MHSS
			PCOO	11:00-1:00	PSR
			PMCG	9:00-1:00	PSR
			MAND	9:00-1:00	PSR
			EROB	9:00-1:00	PSR
			BVIE	8:30-12:30	PSR
				(time chg. from 9:00-1:00)	PSR
ASTA	9:00-1:00	PSR			
65	7/10/14	K. G.	KMAX	11:00-2:00	MHSS
			EROB	10:00-2:00	PSR
			ASTA	10:00-2:00	PSR
			PMCG	10:00-2:00	PSR
			MAND	10:00-2:00	PSR

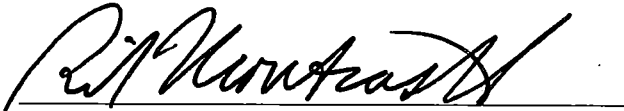
66	7/17/14	K. G.	KMAX	10:00-2:00	MHSS
			CTHO	10:00-2:00	PSR
			JOVE	10:00-4:00	PSR
			PMCG	10:00-4:00	PSR
67	7/22/14	K. G.	KMAX	9:00-1:00	MHSS
			ASTA	9:00-1:00	PSR
			EROB	9:00-1:00	PSR
68	7/24/14	K. G.	KMAX	10:00-2:00	MHSS
			PMCG	10:00-2:00	PSR
			ASTA	10:00-2:00	PSR
			EROB	10:00-2:00	PSR
			JHOP	10:00-2:00	PSR
69	7/31/14	K. G.	KMAX	12:00-2:00	MHSS
			PMCG	10:00-2:00	PSR
			BVIE	10:00-2:00	PSR
			EROB	10:00-2:00	PSR
70	8/14/14	K. G.	KMAX	12:00-4:00	MHSS
			JMAS	10:00-4:00	PSR
			PMCG	10:00-5:00	PSR
			JOVE	10:00-2:00	PSR
71	8/20/14	K. G.	BPOW	12:00-1:00	MHSS
			JOVE	9:00-1:00	PSR
			PMCG	10:00-2:00	PSR
			KBLA	9:00-1:00	PSR
			JMAS	9:00-1:00	PSR
72	8/21/14	K. G.	KMAX	1:00-2:00	MHSS
			JMAS	10:00-2:00	PSR
			PMCG	10:00-2:00	PSR
			KBLA	10:00-2:00	PSR

73	8/27/14	K. G.	BPOW	11:00-12:00	MHSS
			PMCG	9:00-1:00	PSR
			KBLA	9:00-1:00	PSR
			JMAS	9:00-1:00	PSR

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

A TRUE BILL this 26<sup>th</sup> day of June, 2018.

s/Grand Jury Foreperson  
FOREPERSON



RICK A. MOUNTCASTLE  
ATTORNEY FOR THE UNITED STATES  
Acting Under Authority Conferred By  
Title 28, United States Code, Section 515



JOSEPH S. BEEMSTERBOER  
CHIEF  
HEALTH CARE FRAUD UNIT  
FRAUD SECTION, CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE



ANGELA ADAMS  
TRIAL ATTORNEY  
FRAUD SECTION, CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE