

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**FILED**  
JUL 11 2017  
U.S. CLERK'S OFFICE  
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
RAYMOND E. MASSENGILL, )  
)  
Defendant. )

**1:17-cr-0127 WTL-TAB**

**INFORMATION**

The United States Attorney charges that:

**COUNT ONE: Felon In Possession of a Firearm**  
(18 U.S.C. Section 922(g))

1. On or about April 13, 2016, in Marion County Indiana, within the Southern District of Indiana, RAYMOND E. MASSENGILL, defendant herein, after having been convicted of a crime punishable by a term of imprisonment greater than one year, to wit: Mail Fraud, did knowingly possess, in and affecting interstate commerce, a firearm, to wit:

- A. A 20 gauge Harrington and Richardson shotgun.
- B. A 16 gauge Harrington and Richardson shotgun.
- C. A 20 gauge Boito shotgun.

All in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO: Health Care Fraud**  
(18 U.S.C. Section 1347)

2. During all times relevant to this Information, Patient Access Transportation (PAT) was a business providing transportation services in and around the Indianapolis, Indiana area.

3. From on or about January 6, 2015 to April 6, 2016, the defendant RAYMOND E. MASSENGILL was the principal operator PAT. PAT was enrolled as a Indiana Medicaid provider on or before the time period covered by this Information.

4. RAYMOND E. MASSENGILL at various times all within the period covered by this Information submitted claims for services, or caused claims for services to be submitted, purportedly provided by PAT to Indiana Medicaid.

5. Under the Social Security Act, the United States shares with the fifty states the cost of medical services provided to indigent families with dependent children, and to aged, blind, and disabled individuals whose income and resources are insufficient to meet the cost of medical services. This program is generally known as Medicaid. Within broad federal rules, each state decides who is eligible for Medicaid, the services covered, payment levels for services, and administrative and operation procedures. The state directly pays the providers of Medicaid services, with the state obtaining the federal share of the payment from accounts drawn on funds of the United States Treasury. The federal share of each state's Medicaid program varies by individual states. The federal share in Indiana is approximately two-thirds; the state share is one-third.

6. The State of Indiana (Indiana) participates in the Medicaid program (hereinafter Indiana Medicaid). Indiana Medicaid is a health care benefit program within the meaning of Title 18, United States Code, Section 24(b).

7. By becoming a participating provider in Indiana Medicaid, enrolled providers agree to abide by the rules, regulations, policies and procedures governing reimbursement, and to keep and allow access to records and information as required by Indiana Medicaid. In order to receive Medicaid funds, enrolled providers, together with their authorized agents, employees, and contractors, are required to abide by all the rules, regulations, policies and procedures of the Indiana Medicaid program.

8. Providers enrolled in the Indiana Medicaid program agree to submit claims for only medically and reasonably necessary services that are covered under the program and to seek compensation to which the provider is legally entitled.

9. Indiana Medicaid reimburses health care providers, including transportation companies, for covered services, such as transporting Medicaid eligible patients to doctors and hospitals. Payment by Medicaid for transportation of patients is based in part on the mileage driven by the transportation provider, such as PAT. Transportation providers are entitled to a flat rate for transporting a patient up to 10 miles one way, and 20 miles round-trip. The provider is entitled to \$1.25 for each mile driven over that flat-rate amount.

10. Typically in the Medicaid program, and for all conduct covered by this Information, when a covered service is provided, the provider submits a claim to Medicaid for payment and Medicaid pays the provider directly.

11. Beginning on or about January 6, 2015 to April 6, 2016, within the Southern District of Indiana, and elsewhere; RAYMOND E. MASSENGILL, the defendant herein, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute and attempt to execute a scheme and artifice to: (A) defraud a health care benefit program; and (B) obtain money under the custody and control of a health care benefit program by false and fraudulent pretenses, representations and promises.

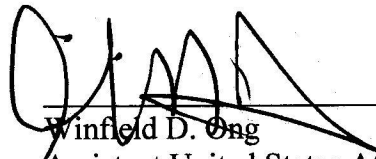
12. The scheme to defraud was that MASSENGILL submitted, or caused to be submitted, approximately 42 claims to Medicaid for transportation of Medicaid recipient "LL" for transportation of LL when that transportation did not occur, for a total loss to the Medicaid program of approximately \$15,762.

All in violation of Title 18, United States Code, Section 1347.

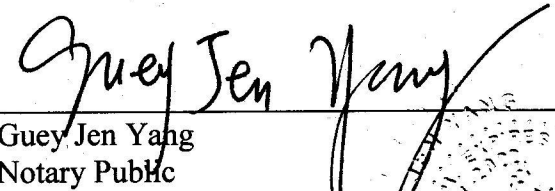
*Josh J. Minkler* FALSA, for  
JOSH J. MINKLER  
United States Attorney

STATE OF INDIANA )  
 )  
 ) SS:  
COUNTY OF MARION )

Winfield D. Ong, being first duly sworn, upon his oath deposes and says that he is an Assistant United States Attorney in and for the Southern District of Indiana, that he makes this affidavit for and on behalf of the United States of America and that the allegations in the foregoing Information are true as he is informed and verily believes.

  
\_\_\_\_\_  
Winfield D. Ong  
Assistant United States Attorney

Subscribed and sworn to before me, a notary public, on this 11th day of July, 2017.

  
\_\_\_\_\_  
Guey Jen Yang  
Notary Public

My Commission Expires:

June 27, 2022

My County of Residence:

Hendricks County

