

**FILED**  
VANESSA L. ARMSTRONG, CLERK

MAY 24 2018

U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT BOWLING GREEN

UNITED STATES OF AMERICA

INDICTMENT

v.

NO. 1:18-CR-16-GNS

**CHANDRA DUNDUMALLA REDDY**  
**VINODINI DUNDUMALLA REDDY**

18 U.S.C. § 982(a)(7)  
18 U.S.C. § 982(a)(2)(B)  
18 U.S.C. § 1035  
18 U.S.C. § 1347  
18 U.S.C. § 1349  
21 U.S.C. § 843(a)(2)  
21 U.S.C. § 846  
21 U.S.C. § 853

The Grand Jury charges:

COUNT 1

*(Illegal Use of DEA Registration Number Issued to Another-Conspiracy)*

Beginning no later than August 1, 2010, and continuing through on or about October 1, 2013, in the Western District of Kentucky, Barren County, Kentucky, and elsewhere, Defendant **CHANDRA DUNDUMALLA REDDY**, did knowingly and intentionally combine, conspire, confederate and agree with other persons, known and unknown to the Grand Jury, to use a registration number belonging to another person in the course of dispensing and distributing Schedule II, III, and IV controlled substances, to wit: **CHANDRA DUNDUMALLA REDDY** pre-signed controlled substance prescriptions for his nurse practitioners, who did not have DEA registration numbers assigned to them, to use while he was away from his medical practice.

In violation of Title 21, United States Code, Sections 843(a)(2) and 846.

The Grand Jury further charges:

COUNT 2  
*(Health Care Fraud-Conspiracy)*

Beginning no later than August 1, 2010, and continuing through on or about October 1, 2013, in the Western District of Kentucky, Barren County, Kentucky, **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to knowingly and willfully execute, and attempt to execute, a scheme and artifice to obtain, by means of false or fraudulent pretenses, representations, and promises, money or property owned by and under the custody or control of health care benefit programs, in connection with the delivery of, and payment for health care benefits, items, and services, to wit: **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**, and others, while operating D. Chandra Reddy, M.D., PSC, billed Medicare under **CHANDRA DUNDUMALLA REDDY'S** National Provider Identifier (NPI) for services that were performed by nurse practitioners while **CHANDRA DUNDUMALLA REDDY** was not in the office knowing that Medicare's reimbursement rate was less when services were performed by a nurse practitioner than by a doctor.

In violation of Title 18, United States Code, Sections 1347 and 1349.

The Grand Jury further charges:

COUNT 3  
*(Health Care Fraud-Conspiracy)*

Beginning no later than August 1, 2010, and continuing through on or about October 1, 2013, in the Western District of Kentucky, Barren County, Kentucky, **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to knowingly and willfully execute, and attempt to execute, a scheme and artifice to obtain, by means of false or fraudulent pretenses, representations, and promises, money or property owned by, and under the custody or control of health care benefit programs, in connection with the delivery of, and payment for health care benefits, items, and services, to wit: **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**, and others, while operating D. Chandra Reddy, M.D., PSC, falsely and fraudulently billed Medicare and other health care benefit programs by submitting claims for office visits at a higher code than the service actually provided.

In violation of Title 18, United States Code, Sections 1347 and 1349.

The Grand Jury further charges:

COUNT 4  
*(False Statements Relating to Health Care Matters-Conspiracy)*

Beginning no later than August 1, 2010, and continuing through on or about October 1, 2013, in the Western District of Kentucky, Barren County, Kentucky, **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with others, known and

unknown to the Grand Jury, to knowingly and willfully falsify, conceal, and cover up by and trick, scheme, and device a material fact, in connection with the delivery of, and payment for health care benefits, items, and services, to wit: **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**, and others, while operating D. Chandra Reddy, M.D., PSC, falsely and fraudulently concealed and covered up fraudulent billing by altering patient medical charts before health care benefit plan audits occurred and continued to alter patient medical charts to cover up and conceal fraudulent billings for future health care benefit audits.

In violation of Title 18, United States Code, Sections 1035 and 1349.

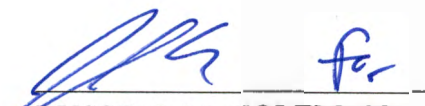
NOTICE OF FORFEITURE

If convicted of any violation of Title 18, United States Code, Sections 1035, 1347 and 1349; and Title 21, United States Code, Sections 843 and 846; **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**, the defendants, shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of any such violation, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

Pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and (7), and Title 21, United States Code, Section 853.

A TRUE BILL. *10*

  
FOREPERSON

  
RUSSELL M. COLEMAN  
UNITED STATES ATTORNEY  
RMC:JRA:20180523

UNITED STATES OF AMERICA v. **CHANDRA DUNDUMALLA REDDY** and **VINODINI DUNDUMALLA REDDY**

**PENALTIES**

Count 1: NM 4 yrs/\$250,000 fine/both/NM 1 yr. Supervised Release  
Counts 2-3: NM 10 yrs./\$250,000 /both/NM 3 yrs. Supervised Release (each count)  
Count 4: NM 5 yrs/\$250,000 fine/both/NM 3 yr. Supervised Release  
Forfeiture

**NOTICE**

**ANY PERSON CONVICTED OF AN OFFENSE AGAINST THE UNITED STATES SHALL BE SUBJECT TO SPECIAL ASSESSMENTS, FINES, RESTITUTION & COSTS.**

**SPECIAL ASSESSMENTS**

18 U.S.C. § 3013 requires that a special assessment shall be imposed for each count of a conviction of offenses committed after November 11, 1984, as follows:

Misdemeanor:	\$ 25 per count/individual	Felony:	\$100 per count/individual
	\$125 per count/other		\$400 per count/other

**FINES**

In addition to any of the above assessments, you may also be sentenced to pay a fine. Such fine is due immediately unless the court issues an order requiring payment by a date certain or sets out an installment schedule. You shall provide the United States Attorney's Office with a current mailing address for the entire period that any part of the fine remains unpaid, or you may be held in contempt of court. 18 U.S.C. § 3571, 3572, 3611, 3612

**Failure to pay fine as ordered may subject you to the following:**

1. **INTEREST** and **PENALTIES** as applicable by law according to last date of offense.

For offenses occurring after December 12, 1987:

No **INTEREST** will accrue on fines under \$2,500.00.

**INTEREST** will accrue according to the Federal Civil Post-Judgment Interest Rate in effect at the time of sentencing. This rate changes monthly. Interest accrues from the first business day following the two week period after the date a fine is imposed.

**PENALTIES** of:

10% of fine balance if payment more than 30 days late.

15% of fine balance if payment more than 90 days late.

2. Recordation of a **LIEN** shall have the same force and effect as a tax lien.
3. Continuous **GARNISHMENT** may apply until your fine is paid.

18 U.S.C. §§ 3612, 3613

If you **WILLFULLY** refuse to pay your fine, you shall be subject to an **ADDITIONAL FINE** of not more than the greater of \$10,000 or twice the unpaid balance of the fine; or **IMPRISONMENT** for not more than 1 year or both. 18 U.S.C. § 3615

RESTITUTION

If you are convicted of an offense under Title 18, U.S.C., or under certain air piracy offenses, you may also be ordered to make restitution to any victim of the offense. in addition to, or in lieu of any other penalty authorized by law. 18 U.S.C. § 3663

APPEAL

If you appeal your conviction and the sentence to pay your fine is stayed pending appeal, the court shall require:

1. That you deposit the entire fine amount (or the amount due under an installment schedule during the time of your appeal) in an escrow account with the U.S. District Court Clerk, or
2. Give bond for payment thereof.

18 U.S.C. § 3572(g)

PAYMENTS

If you are ordered to make payments to the U.S. District Court Clerk's Office, certified checks or money orders should be made payable to the Clerk, U.S. District Court and delivered to the appropriate division office listed below:

LOUISVILLE: Clerk, U.S. District Court  
106 Gene Snyder U.S. Courthouse  
601 West Broadway  
Louisville, KY 40202  
502/625-3500

BOWLING GREEN: Clerk, U.S. District Court  
120 Federal Building  
241 East Main Street  
Bowling Green, KY 42101  
270/393-2500

OWENSBORO: Clerk, U.S. District Court  
126 Federal Building  
423 Frederica  
Owensboro, KY 42301  
270/689-4400

PADUCAH: Clerk, U.S. District Court  
127 Federal Building  
501 Broadway  
Paducah, KY 42001  
270/415-6400

If the court finds that you have the present ability to pay, an order may direct imprisonment until payment is made.

FORM DBD-34  
JUN.85

No.

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**UNITED STATES DISTRICT COURT**  
Western District of Kentucky  
Louisville

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THE UNITED STATES OF AMERICA  
vs.

**CHANDRA DUNDUMALLA REDDY**  
**VINODINI DUNDUMALLA REDDY**

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**INDICTMENT**

**Count 1:**  
**Illegal Use of DEA Registration Number**  
**Issued to Another - Conspiracy:**  
21 U.S.C. §§843(a)(2) and 846

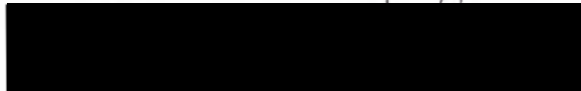
**Counts 2-3:**  
**Health Care Fraud - Conspiracy:**  
18 U.S.C. §§1347 and 1349

**Counts 4:**  
**False Statements Relating to**  
**Health Care Matters - Conspiracy:**  
18 U.S.C. §§1035 and 1349

**Forfeiture**

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*A true bill.*



*Foreperson*

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*Filed in open court this 24<sup>th</sup> day of May, 2018.*

**FILED**  
VANESSA L. ARMSTRONG, CLERK

MAY 24 2018

*Clerk*

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*Bail, \$*

**U.S. DISTRICT COURT**  
**WEST'N. DIST. KENTUCKY**

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