

FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, did knowingly make and present to a person and officer in the civil, military, or naval service of the United States, and to a department and agency thereof, claims upon and against the United States, and a department and agency thereof, knowing such claims to be false, fictitious, and fraudulent, to wit, the defendants submitted claims for payment for medical transportation services to the New York State Department of Health's Medicaid program ("Medicaid"), which is partially funded by the federal government, knowing that those claims were false, fictitious, and fraudulent.

(Title 18, United States Code, Sections 287 and 2.)

COUNT TWO

(Theft of Government Funds)

2. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, did embezzle, steal, purloin, and knowingly convert to their use and the use of others, vouchers, money, and things of value of the United States and a department and agency thereof, to wit, the United States Department of Health and Human Services, which exceeded the sum of \$1,000, and did receive, conceal, and retain the same with intent to convert it to their use and gain, knowing it to have been embezzled, stolen, purloined and converted, to wit, the defendants submitted false claims for payment to Medicaid, which is partially funded by the federal government, and subsequently obtained funds pursuant to those claims.

(Title 18, United States Code, Sections 641 and 2.)

COUNT THREE

(Wire Fraud)

3. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO

SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, the defendants sent or caused to be sent electronic communications related to their false claims submitted to Medicaid for payment for transportation services.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT FOUR
(Health Care Fraud)

4. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud a health care benefit program and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services, to wit, the defendants participated in a scheme to submit fraudulent claims for payment from Medicaid related to transportations services.

(Title 18, United States Code, Sections 1347 and 2.)

COUNT FIVE
(Conspiracy to Commit Wire Fraud and Health Care Fraud)

5. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, and others known and unknown, willfully and knowingly, did

combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, and health care fraud, in violation of Title 18, United States Code, Section 1347.

6. It was a part and object of the conspiracy that JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

7. It was further a part and object of the conspiracy that JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud a health care benefit program and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, 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.

(Title 18, United States Code, Section 1349.)

COUNT SIX

(Aggravated Identity Theft)

8. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, knowingly did transfer, possess, and use, without lawful

authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, the defendants obtained identifying information for Medicaid recipients and submitted that information to Medicaid in order to fraudulently receive payment for transportation services in furtherance of the offenses charged in Counts Two, Three, Four, and Five of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1) and (b), and 2.)

COUNT SEVEN

(Violation of Anti-Kickback Statute)

9. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, willfully and knowingly would and did offer and pay remuneration (including kickbacks, bribes, and rebates), directly and indirectly, overtly and covertly, in cash and in kind, (1) to a person to induce such person to refer Medicaid beneficiaries to a person for the furnishing and arranging for the furnishing of items and services for which payment may be made in whole and in part under a Federal health care program, and (2) to Medicaid beneficiaries to induce those beneficiaries to purchase, lease, order and arrange for and recommend purchasing, leasing and ordering goods, facilities, services and items for which payment may be made in whole and in part under a Federal health care program, to wit, the defendants paid Medicaid beneficiaries "kickbacks" to induce them to schedule Medicaid-funded transportation.

(Title 42, United States Code, Section 1320a-7b(b)(2); and Title 18, United States Code, Section 2.)

COUNT EIGHT

(Money Laundering)

10. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JORGELINA ABREU GIL, the defendant, did knowingly engage and attempt to engage in a monetary transaction, in criminally derived property of a value greater than \$10,000, to

wit, on or about June 8, 2018, ABREU GIL cashed a check issued by a particular financial institution ("Bank-1") worth approximately \$80,000, such property having been derived from a specified unlawful activity, to wit, wire fraud, in violation of 18 U.S.C. § 1343.

(Title 18, United States Code, Sections 1957 and 2.)

COUNT NINE
(Money Laundering)

11. From in or about August 2017 up to and including in or about January 2020, in the Southern District of New York and elsewhere, JULIO ALVARADO, the defendant, did knowingly engage and attempt to engage in a monetary transaction, in criminally derived property of a value greater than \$10,000, to wit, on or about June 20, 2018, ALVARADO transferred \$20,000 from an account held in the name of KJ Transportation C Services Inc. ("KJ") at a particular financial institution ("Bank-2") to an account held in his own name, such property having been derived from a specified unlawful activity, to wit, wire fraud, in violation of 18 U.S.C. § 1343.

(Title 18, United States Code, Sections 1957 and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

12. I have been involved in the investigation of this matter. I have been a Special Agent with HSI for approximately two years. Before joining HSI, I worked at United States Customs and Border Protection ("CBP") for five years. During my time at HSI and CBP, I have investigated, among other things, wire fraud and money laundering schemes. I base this affidavit on my involvement in this investigation and my training and experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

13. As set forth below, I submit that probable cause exists to believe that JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ,

JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, and others known and unknown, have participated in a scheme to submit thousands of fraudulent claims for medical transportation services to Medicaid.

New York State Medicaid Program

14. Based on my conversations with individuals at the New York States Office of the Medicaid Inspector General ("OMIG"), I have learned, in sum and substance, the following:

a. New York State administers a Medicaid program to subsidize medical costs for low-income individuals living in New York. The program is funded in part by money from the federal government.

b. In order to qualify for Medicaid subsidies, an individual must demonstrate that their income falls below certain limits.

c. For qualifying individuals, Medicaid will pay for certain medical costs in whole or in part. Among other things, Medicaid will pay for non-emergency transportation costs related to medical care. For example, Medicaid will pay for a patient's transportation to and from a doctor's office if the patient needs to travel for an appointment.

d. After transportation services are provided to a qualifying individual, either the individual, the transportation provider, or a service bureau, *i.e.*, a company that provides billing services, may submit a claim for reimbursement to Medicaid. If the transportation provider submits the claim to Medicaid and Medicaid approves the claim, payment for the transportation will be sent directly to the transportation provider according to a schedule based on the length of travel and other factors.

Transportation Manager-1 and the Attestation Requirement

15. Based on my conversations with OMIG employees and employees of a particular company ("Transportation Manager-1"), I have learned, in sum and in substance, the following:

a. Transportation Manager-1 is a transportation management company that is contracted by DOH to manage Medicaid-funded transportation in various counties in New York.

Transportation Manager-1 currently manages Medicaid-funded transportation for New York City and has done so during the entire period when KJ has been submitting claims to Medicaid, *i.e.*, from in or about August 2017 to the present.

b. All requests for Medicaid-funded non-emergency medical transportation in New York City must be arranged through Transportation Manager-1. A Medicaid enrollee can call Transportation Manager-1 to schedule a single trip or weekly recurring trips, also known as "standing orders." To schedule a trip or standing order, a Medicaid enrollee may be asked to provide their Medicaid number, date of birth, or the last four digits of their social security number as proof of their identity. They must also provide the pickup and dropoff location for the ride, and information for the return trip, if applicable. A Medicaid enrollee may specifically request a transportation provider, such as KJ, or Transportation Manager-1 will randomly assign a trip to a provider.

c. Medicaid enrollees may also schedule trips online by creating a username on the Transportation Manager-1 website and requesting a trip or standing order there.¹

d. In addition to Medicaid enrollees, medical providers are permitted to call Transportation Manager-1 to schedule transportation for their patients. However, transportation providers are not permitted to call Transportation Manager-1 to schedule trips.

e. Rather, transportation providers receive daily rosters of trips assigned to them through Transportation Manager-1. These rosters could include, among other things, one-off or standing order trips where that transportation provider was specifically requested by the customer, and one-off or standing order trips where that transportation provider was randomly assigned to the trip by Transportation Manager-1.

f. After completing the ride, the transportation provider must log into the Transportation Manager-1 website and attest to the ride. To do so, the transportation provider must supply the name and driver's license number of the driver who drove the customer during that trip, and the license plate number of the vehicle that was used

¹ Based on my communications with a Transportation Manager-1 employee, I have learned that Transportation Manager-1's servers are located in California.

for that trip. The transportation provider must also press a button that says "ATTEST" in order to confirm that the ride actually took place.

g. There are warnings on the Transportation Manager-1 website about the consequences of submitting fraudulent claims for rides. For example, since at least in or about February 2018, the attestation page has prominently featured a notice that states:

PLEASE TAKE NOTICE: FILING FALSE STATEMENTS IS A CRIME
If you attest to a trip that did not take place, you are filing a false statement and committing a crime. Anyone filing a false statement will be prosecuted to the fullest extent of the law.

16. Based on my review of records provided by OMIG, I have learned, in substance and in part, the following:

a. Transportation providers are required to complete an annual form titled "Certification Statement for Provider Billing Medicaid" (the "Annual Certification Form").

b. On the form, the transportation provider is required to, among other things, certify that all claims submitted to the Medicaid program will be "TRUE, ACURATE AND COMPLETE TO THE BETS OF MY KNOWLEDGE." The provider must also acknowledge that they "understand and agree" that they are "subject to and bound by all rules, regulations, policies, standards, fee codes and procedures of the New York State Department of Health and the Office of the Medicaid Inspector General as set forth in statute or Title 18 of the Official Compilation of Codes, Rules and Regulation of New York State"

c. The provider also certifies that "I UNDERSTAND THAT MY SIGNATURE HEREON THE ABOVE CERTIFICATION WILL APPLY TO ALL CLAIMS SUBMITTED ELECTRONICALLY OR ON PAPER, USING MY (OR THIS ENTITY'S) NPI OR MEDICAID PROVIDER IDENTIFICATION NUMBER."

17. Based on my conversations with OMIG employees and my review of the applicable regulations, I have learned that Title 18, New York Codes, Rules and Regulations, Section 515.2 prohibits making any false claim for medical services and making any false statement in connection with a medical assistance payment. The same section prohibits "offering or paying either directly or indirectly any payment (including any kickback,

bribe, referral fee, rebate or discount), whether in cash or in kind, in return for purchasing, leasing, ordering or recommending any medical care, services or supplies for which payment is claimed under the program . . . [u]nless the discount or reduction in price is disclosed to the client and the department and reflected in a claim, or a payment is made pursuant to a valid employer-employee relationship."

KJ Transportation C Services Inc.

18. Based on my review of information on KJ's website, I have learned that KJ is a car service and transportation company. KJ provides, among other things, "non-emergency medical transportation" services whereby KJ will transport patients to and from medical appointments.

19. Based on my conversations with employees at OMIG and my review of records provided by OMIG, I have learned, in substance and in part, the following:

a. In or about August 2017, KJ began submitting claims to Medicaid for transportation-related services on behalf of Medicaid enrollees.

b. From in or about August 2017 to in or about December 2019, KJ submitted approximately 161,000 claims for transportation services.²

c. For claims submitted from in or about August 2017 to in or about February 2020, DOH, through the Medicaid program, paid KJ approximately \$20 million. KJ receives money from Medicaid approximately each week as payment for the claims it submits. For example, on or about January 27, 2020, KJ received a payment of approximately \$290,000 from Medicaid. On or about February 3, 2020, KJ received a payment of approximately \$351,000 from Medicaid.

20. Based on my conversation with an employee of Transportation Manager-1 ("Individual-1"), I have learned, in

² As used in this Complaint, a "claim" means all the requests for payment associated with one round trip. For example, if a customer was transported to and from a single doctor's appointment and his or her transportation provider submitted requests for payment and reimbursement related to both legs of the trip and tolls, all of those requests for payment or reimbursement would be identified as one "claim" in this Complaint.

substance and in part, the following:

a. Individual-1 regularly conducts trainings for new companies enrolling with Transportation Manager-1 to provide Medicaid-funded non-emergency medical transportation services.

b. On or about August 23, 2017, Individual-1 went to KJ's office in the Bronx, New York (the "KJ Office") and trained JORGELINA ABREU GIL, the defendant, on how to use the Transportation Manager-1 platform.

c. Among other things, Individual-1 explained that ABREU GIL should only attest to trips that did, in fact, take place.

21. Based on my review of records provided by OMIG, I have learned that JORGELINA ABREU GIL, the defendant, completed and signed KJ's 2017 Annual Certification Form. On the form, ABREU GIL identifies herself as the President of KJ. ABREU GIL also completed and signed Annual Certification forms in 2018 and 2019.

22. Based on my conversations with individuals associated with a particular company that provides billing services to transportation providers ("Billing Provider-1") and my review of notes from conversations with individuals associated with Billing Provider-1, I have learned, in substance and in part, the following:

a. Billing Provider-1 is a company that offers various services for transportation providers in the medical transportation industry, including dispatching and billing.

b. Since in or about 2017, Billing Provider-1 has been the billing provider for KJ.

c. Among other things, and using various organizational and technological products, Billing Provider-1 helps KJ submit claims for reimbursement to DOH. Billing Provider-1 also helps KJ respond to any claims found to be ineligible or otherwise denied by DOH.

d. Billing Provider-1's primary contacts at KJ are JULIO ALVARADO and JORGELINA ABREU GIL, the defendants, and an individual who worked as an administrative assistant at KJ ("Co-Conspirator-1").

e. ALVARADO, ABREU GIL, and Co-Conspirator-1 regularly contact individuals at Billing Provider-1 to discuss KJ's billing concerns. For example, ALVARADO and ABREU GIL have contacted Billing Provider-1 to ask why certain of DOH's weekly payments were not as large as ALVARADO or ABREU GIL expected.

23. Based on my review of Transportation Manager-1 records, I have learned that the overwhelming majority of KJ's claims -- more than 99% -- were attested to by JORGELINA ABREU GIL, the defendant. As set forth below, many of the claims attested to by ABREU GIL were fraudulent.

KJ's Fraudulent Claims

24. As set forth below, based on my investigation, I have learned a significant volume of the claims submitted by KJ were fraudulent.

25. Based on my conversations with employees at OMIG and my review of records provided by OMIG, I have learned, in substance and in part, that KJ submitted a large number of transportation claims on days when the Medicaid patient did not have an associated claim for Medicaid-funded treatment on the same day. This is emblematic of fraud because a Medicaid patient would likely only use Medicaid-funded transportation on the same day they receive Medicaid-funded medical treatment.

26. Based on my investigation and my review of records provided by OMIG, I have learned that from in or about August 2017 to in or about December 2019, KJ submitted approximately 121 claims for services for nine individuals who were deceased at the time the services were purportedly provided, based on my review of law enforcement databases and death certificates obtained from New York State. Because the individuals were deceased, they could not have required transportation-related services on the dates when KJ claimed to be transporting them. Each of these claims was attested to by JORGELINA ABREU GIL, the defendant.

27. Based on my conversations with employees at OMIG and my review of records provided by OMIG, I have learned that from in or about January 2019 to in or about June 2019, KJ submitted 184 claims for transportation services for a particular individual ("Medicaid Enrollee-1"). However, law enforcement records show that Medicaid Enrollee-1 traveled out of the United States on or about December 31, 2018, and was not present in the United States during the time period when transportation services were purportedly provided to him by KJ.

28. Based on my conversations with employees at OMIG and my review of records provided by OMIG, I have learned, in substance and in part, that, between in or about April 2019 and in or about July 2019, KJ submitted 59 claims for a particular individual's ("Medicaid Enrollee-2's") transportation.

29. Based on my review of records provided by Transportation Manager-1, I have learned, in substance and in part, that KJ claimed it provided trips for Medicaid Enrollee-2 from a home address at a particular location in Brooklyn, New York ("Brooklyn Address-1") to a methadone appointment at a particular location in the Bronx, New York.

30. On or about July 24, 2019, I interviewed Medicaid Enrollee-2. During that interview, I learned the following:

a. Medicaid Enrollee-2 has never lived at Brooklyn Address-1. Instead, for the past four years, she has lived at her current address in the Bronx.

b. Medicaid Enrollee-2 has never used KJ for transportation services.

31. Based on my conversations with employees at OMIG, I have learned that transportation providers, such as KJ, are generally paid more money for longer trips than shorter trips. Accordingly, KJ received more money from Medicaid by claiming that Medicaid Enrollee-2's purported trip to the Bronx began in Brooklyn than it would have made if it stated that the purported trip began and ended in the Bronx.

32. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-2.

33. Based on my review of records provided by OMIG and law enforcement records, I have learned, in substance and in part, the following:

a. Each transportation claim submitted by KJ lists the driver who purportedly drove the Medicaid enrollee for the trip claimed.

b. From in or about January 2018 to in or about July 2019, KJ submitted approximately 419 claims for transportation services in which the driver listed was not in the United States, according to law enforcement records that

identify when an individual travels out of or into the United States. These claims involved more than 21 different purported drivers.

34. Based on my review of Transportation Manager-1 records, I have learned that JORGELINA ABREU GIL, the defendant, attested to all or nearly all of the claims in which the driver listed was out of the country.

35. Based on my review of Transportation Manager-1 records reflecting customer complaints against KJ, I have learned, in substance and in part, the following:

a. On or about April 1, 2018, a Transportation Manager-1 employee learned that although a Medicaid enrollee had been calling into Transportation Manager-1 to purportedly request transportation to an emergency room, the emergency room reported that the enrollee had never been a patient there.

b. On or about August 21, 2018, an individual called Transportation Manager-1 to report that, contrary to the claims being submitted by KJ, the individual did not have a standing order to visit a methadone clinic. Instead, trips were being taken on the individual's behalf.

c. On or about October 11, 2018, a Transportation Manager-1 employee contacted a Medicaid enrollee who had been purportedly taking trips to methadone clinics using KJ's transportation services. The enrollee told the Transportation Manager-1 employee that he does not use methadone and felt that someone else was using his Medicaid credentials.

d. On or about April 13, 2019, a Medicaid enrollee called Transportation Manager-1 to report that, contrary to the claims being submitted by KJ, she had never used KJ for transportation services.

e. On or about April 13, 2019, a Transportation Manager-1 employee learned that an online username associated with KJ was booking transportation services for a Medicaid enrollee who was then-living in Florida.

36. Based on my conversations with employees at OMIG and my review of records provided by OMIG, I have learned, in substance and in part, that KJ has submitted an increasingly large volume of claims to Medicaid:

a. In the first quarter of 2018, KJ submitted

claims for approximately 3800 different trips, worth approximately \$300,000.

b. In the second quarter of 2018, KJ submitted claims for approximately 10,000 different trips, worth approximately \$1 million.

c. In the third quarter of 2018, KJ submitted claims for approximately 12,000 different trips worth approximately \$1.3 million.

d. In the fourth quarter of 2018, KJ submitted claims for approximately 24,000 different trips worth approximately \$3 million.

e. In the first quarter of 2019, KJ submitted claims for approximately 21,000 different trips worth approximately \$2.8 million.

f. In the second quarter of 2019, KJ submitted claims for approximately 25,000 different trips worth approximately \$3.4 million.

g. In the third quarter of 2019, KJ submitted claims for approximately 34,000 different trips worth approximately \$4.7 million.

h. In the fourth quarter of 2019, KJ submitted claims for approximately 26,000 different trips worth approximately \$3.6 million.³

KJ's Trip Records

37. Based on my conversations with an individual associated with a particular company that provides dispatch services ("Dispatch Service-1"), I have learned, in substance and in part, the following:

a. Dispatch Service-1 provides a number of software-based services for transportation companies. Among

³ Based on my conversation with employees at OMIG, I have learned that transportation providers may continue to submit claims days, weeks, or months after a trip purportedly occurs. I received data from OMIG related to KJ's claims in or about mid-January 2019. Accordingly, the actual number of claims for KJ in the fourth quarter of 2019, and the amount KJ was paid for those claims, may be greater than the number listed here.

other things, Dispatch Service-1 provides software that can serve a dispatcher function, allowing a transportation company to manage and record customers, drivers, and trips.

b. Using Dispatch Service-1's dispatch software, a transportation company can assign a particular driver to a particular trip.

c. The transportation provider can see all trips conducted by a driver during a given time period.

d. Since in or about 2017, KJ has used Dispatch Service-1's dispatch software (the "Dispatch System").

38. On or about April 19, 2019, I interviewed JULIO ALVARADO, the defendant, who identified himself as the owner/manager of KJ. According to ALVARADO, records relating to his business operations were held by Dispatch Service-1.

39. Based on my review of records provided by Dispatch Service-1, I have learned that KJ assigned most drivers in its Dispatch System a particular number (a "Driver Number"). For example, one driver would be associated with Driver Number 1, another would be associated Driver Number 2, and yet another would be associated with Driver Number 3.

40. Based on my review of emails obtained pursuant to a judicially authorized search warrant, I have learned, in substance and in part, the following:

a. On or about August 19, 2019, a user sent an email from a particular email account associated with KJ (the "KJ Email Account-1") to Co-Conspirator-1.

b. Attached to the email was a spreadsheet file titled "DRIVERS D UPDATE" (the "Driver Number List").

41. The Driver Number List identifies individuals associated with KJ, including several defendants and co-conspirators, and "car numbers", i.e., Driver Numbers, for each. In addition, based on my review of bank records and my communications with other law enforcement officers who have reviewed bank records, I have learned that checks issued from KJ's bank accounts, which are always or nearly always signed by JULIO ALVARADO or JORGELINA ABREU GIL, the defendants, confirm the Driver Numbers on the Driver Number List or identify additional Driver Numbers associated with certain defendants. For example:

a. Based on the Driver Number List, "Yesseni Rodriguez," believed to be YESENIA RODRIGUEZ, the defendant, is assigned Driver Numbers 1, 2166, 2169, and 2193. Several checks issued to RODRIGUEZ reference the number 1 in the memo line for the check.

b. Based on the Driver Number List, HECTOR SALAZAR HERRERA, the defendant, is assigned Driver Numbers 3, 55, 78, 188, 2130, 2131, and 2132. Several checks issued to SALAZAR HERRERA reference the number 3 in the memo line.

c. Based on the Driver Number List, JOHN MANUEL MEJIA, the defendant, is assigned Driver Numbers 11 and 2231. Checks issued to MEJIA reference the numbers 1, 11, 24, 25, and 2231, among others.

d. Based on the Driver Number List, JOSE RIVERA, the defendant, is assigned Driver Number 20, among others.

e. Based on the Driver Number List, ZORAIDA GONZALEZ, the defendant, is assigned Driver Numbers 102, 2135, 2143, and 2164. Several checks issued to GONZALEZ reference the number 102 in the memo line.

f. Based on the Driver Number List, "Fabian," believed to be FABIAN MORGAN, the defendant, is assigned to Driver Numbers 213, 2160, 2161, 2162, and 2197. One check issued to MORGAN references the number 213 in the memo line.

g. Based on the Driver Number List, "Francisco," believed to be FRANCISCO SALAZAR, the defendant, is assigned to Driver Number 1007. Several checks issued to SALAZAR reference the number 1007 in the memo line.

h. Several checks issued to CRISTOPHER SANTOS FELIX, the defendant, reference the numbers 25, 32, and 37 in the memo line. Certain checks say "Car 37" or "Car #37" in the memo line.

i. Several checks issued to VICTORIA PALMA BREA, the defendant, reference the numbers 32 and 37 in the memo line. Certain checks say "Car 37" or "Car #37" in the memo line.

j. Several checks issued to JOSE JIMENEZ HIDALGO, the defendant, reference car numbers 37 and 58 in the memo line.

k. Based on the Driver Number List, a particular individual who works at KJ ("Co-Conspirator-2") is assigned to Driver Numbers 523, 524, 2123, 2124, and 2137. Several checks issued to Co-Conspirator-2 reference car numbers 523 and 2137.

42. As set forth below, records from Dispatch Service-1 associate several fraudulent trip claims with specific defendants based on their Driver Numbers.

HECTOR SALAZAR HERRERA

A. Medicaid Enrollee-3 and Medicaid Enrollee-4

43. Based on my conversations with a particular Medicaid enrollee ("Medicaid Enrollee-3"), I have learned, in substance and in part, the following:

a. Medicaid Enrollee-3 began scheduling Medicaid-funded transportation through Transportation Manager-1 in late-summer or fall 2017.

b. Medicaid Enrollee-3 grew unhappy with the first transportation company that gave her trips. She eventually saw a card for KJ and began requesting trips with KJ through Transportation Manager-1.

c. On a handful of occasions, HECTOR SALAZAR HERRERA, the defendant, himself drove Medicaid Enrollee-3 for her Medicaid-funded transportation. On other occasions, SALAZAR HERRERA sent other drivers.

d. During this time, Medicaid Enrollee-3 used Medicaid-funded transportation approximately three times per week.

e. In or about early-2018, SALAZAR HERRERA offered to pay Medicaid Enrollee-3 if she continued to schedule trips through KJ but she did not travel with KJ. Instead, SALAZAR HERRERA would pay her a certain amount per trip if she traveled to her medical appointment on her own without using transportation from KJ. She agreed.

f. In or about early-2018, SALAZAR HERRERA began supplying Medicaid Enrollee-3 with cars to use instead of paying her money. Medicaid Enrollee-3 and her family members were able to use the car because she had trips scheduled with KJ and SALAZAR HERRERA but did not take those trips. Later in

early-2018, a family member of Medicaid Enrollee-3 had a car accident in one of the cars provided by SALAZAR HERRERA, so he stopped providing cars.

g. In 2018, when Medicaid Enrollee-3 was scheduling trips for herself that she was not taking, SALAZAR HERRERA informed her that her Medicaid eligibility had been suspended, so she could not schedule Medicaid-funded trips through Transportation Manager-1. SALAZAR HERRERA proposed that she instead schedule trips using her father's ("Medicaid Enrollee-4's") Medicaid information. Medicaid Enrollee-3 agreed and scheduled trips using her father's Medicaid information. He did not take any trips with KJ.

h. When Medicaid Enrollee-3 scheduled trips through Transportation Manager-1, she set up standing orders that extended for 30 days or more from the date she called. If she did not need transportation on a given day when it had been scheduled, she did not call Transportation Manager-1 to cancel the trip. She stopped scheduling trips with KJ in 2018.

44. Based on my review of bank records for an account belonging to HECTOR SALAZAR HERRERA, the defendant, and records from a particular peer-to-peer payment application ("Payment Service-1"), I have learned that, from September 2018 to December 2018, SALAZAR HERRERA sent Medicaid Enrollee-3 11 payments worth between \$100 and \$250 each.

45. Based on my review of communications between HECTOR SALAZAR HERRERA, the defendant, and Medicaid Enrollee-3, recovered from Medicaid Enrollee-3's phone, I have learned that, on several occasions, SALAZAR HERRERA and Medicaid Enrollee-3 discussed SALAZAR HERRERA paying Medicaid Enrollee-3 money. For example:

a. On November 11, 2018, SALAZAR HERRERA instructed Medicaid Enrollee-3 to schedule transportation through Transportation Manager-1 listing her address in Brooklyn as the pickup location and a particular location in the Bronx, which SALAZAR HERRERA described as a therapy clinic ("Medical Provider-1") as the dropoff location.

b. On February 20, 2019, after Medicaid Enrollee-3 had stopped entering trips for her and her family, SALAZAR HERRERA wrote to her asking her to again schedule trips for KJ using her child's Medicaid information. SALAZAR HERRERA sent contact information for Transportation Manager-1, identified as "Medicaid Transport Office." SALAZAR HERRERA

added, "Make the appointments and I start to pay." Medicaid Enrollee-3 told SALAZAR HERRERA that Transportation Manager-1 instructed her that a Form 2015, a particular form required by Medicaid to process medical transportation claims, needed to be completed.⁴

c. On February 26, 2019, SALAZAR HERRERA offered to "do the 2015" if she sent him certain information.

d. On March 2, 2019, SALAZAR HERRERA indicated he only needed the Medicaid enrollee's Medicaid ID number, phone number, and the last four digits of her social security number to complete the Form 2015.

e. On May 31, 2019, after Medicaid Enrollee-3 messaged SALAZAR HERRERA to say she "need[ed] appointments," SALAZAR HERRERA responded, "But wait u wanna really go to the appointment or u . . . wanna do for the voucher things ?"

46. On or about January 10, 2020, Medicaid Enrollee-3 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts HECTOR SALAZAR HERRERA, the defendant, based on law enforcement records, as the person who had paid her money in exchange for her Medicaid information.

47. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned, in substance and in part, the following:

a. From in or about November 2017 to in or about January 2019, KJ submitted approximately 70 claims for transportation services for Medicaid Enrollee-3. For these claims, KJ was paid approximately \$10,000.

b. From in or about April 2018 to in or about October 2018, KJ submitted approximately 119 claims for transportation services for Medicaid Enrollee-4. For these claims, KJ was paid approximately \$24,000.

48. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU

⁴ Based on my review of Form 2015s, I have learned that the Form 2015 requires a physician to explain, among other things, why an enrollee cannot utilize public transportation to attend medical appointments, *i.e.*, why they should be permitted to use a private taxi service rather than taking public transportation.

GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-3 and Medicaid Enrollee-4.

49. Based on my review of records from Dispatch Service-1, I have learned that several trips for Medicaid Enrollee-3 and Medicaid Enrollee-4 are recorded in KJ's Dispatch System for Driver Number 3, *i.e.*, HECTOR SALAZAR HERRERA, the defendant.

B. Medicaid Enrollee-5

50. Based on my conversations with a particular Medicaid enrollee ("Medicaid Enrollee-5") and my review of notes from an interview of Medicaid Enrollee-5, I have learned, in substance and in part, the following:

a. Prior to 2018, Medicaid Enrollee-5 met HECTOR SALAZAR HERRERA, the defendant, when he drove her for Medicaid-funded transportation.

b. In or about 2018, SALAZAR HERRERA offered to pay Medicaid Enrollee-5 approximately \$150 per week if she gave him her Medicaid information. Medicaid Enrollee-5 agreed, provided her Medicaid card and social security number, and SALAZAR HERRERA soon began paying her money.

c. After SALAZAR HERRERA started paying her, Medicaid Enrollee-5 continued to take Medicaid-funded trips with KJ approximately once or twice per week.

51. Based on my review of records from Payment Service-1, I have learned that, from in or about July 2018 to in or about December 2018, HECTOR SALAZAR HERRERA, the defendant, sent money to Medicaid Enrollee-5 approximately 17 times using Payment Service-1. The payments ranged from \$150 to \$450.

52. Based on my review of records from a particular peer-to-peer money transfer platform ("Payment Service-2"), I have learned that, in or about February 2019 and March 2019, HECTOR SALAZAR HERRERA, the defendant, sent money to Medicaid Enrollee-5 approximately three times using Payment Service-2. The payments ranged from \$150 to \$300.

53. Based on my review of communications between HECTOR SALAZAR HERRERA, the defendant, and Medicaid Enrollee-5, recovered from Medicaid Enrollee-5's phone, I have learned that, on several occasions, SALAZAR HERRERA and Medicaid Enrollee-5 discussed SALAZAR HERRERA paying Medicaid Enrollee-5 money. For

example, on or about February 28, 2019, Medicaid Enrollee-5 asked SALAZAR HERRERA "Did someone send money or no? I'm confused." SALAZAR HERRERA responded "I send u the payment today."

54. Based on my review of records from Dispatch Service-1, I have learned that several trips for Medicaid Enrollee-5 are recorded in KJ's Dispatch System for Driver Number 3, *i.e.*, HECTOR SALAZAR HERRERA, the defendant.

55. On or about December 10, 2019, Medicaid Enrollee-5 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts HECTOR SALAZAR HERRERA, the defendant, based on law enforcement records, as the person who had paid her money in exchange for her Medicaid information.

56. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned that, from in or about September 2017 to in or about October 2019, KJ submitted approximately 443 claims for transportation services for a Medicaid Enrollee-5. For Medicaid Enrollee-5's claims, KJ was paid approximately \$50,000.

57. KJ submitted claims associated with transportation services on four days in July 2019 when, based on my review of law enforcement records, Medicaid Enrollee-5 was detained in jail.

58. Furthermore, my review of records provided by OMIG shows that, from in or about March 2018 to in or about October 2019, KJ submitted claims for transportation services for Medicaid Enrollee-5 approximately five days per week, far in excess of the one or two trips per week that Medicaid Enrollee-5 actually took with KJ.

59. Based on my review of Transportation Manager-1 records, I have learned that JORGELINA ABREU GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-5.

C. Medicaid Enrollee-6

60. Based on my conversations with a particular Medicaid enrollee ("Medicaid Enrollee-6"), I have learned, in substance and in part, the following:

- a. Medicaid Enrollee-6 first learned about

Medicaid-funded transportation in or about December 2017, when a social worker scheduled transportation for her and her child following a medical visit.

b. Medicaid Enrollee-6 met HECTOR SALAZAR HERRERA, the defendant, when he drove her and her child as part of Medicaid-funded transportation in connection with a medical visit.

c. SALAZAR HERRERA proposed to Medicaid Enrollee-6 that she could make \$100 to \$150 per week if she scheduled but did not take additional trips through Medicaid. He noted that, because she was living in a shelter, she might want to make additional money.

d. In early-2018, Medicaid Enrollee-6 agreed to and did schedule trips for her and her two children, who were also enrolled in Medicaid ("Medicaid Enrollee-7" and "Medicaid Enrollee-8"), that they did not take. SALAZAR HERRERA instructed her to use her previous address in Brooklyn, New York, as the pickup address, rather than her true, current address in the Bronx. He added that, alternatively, she could schedule two roundtrips per day from locations in the Bronx.

e. SALAZAR HERRERA instructed Medicaid Enrollee-6 that if she did not want to make the calls to Transportation Manager-1 herself, he could arrange for someone else to make the calls.

f. In total, Medicaid Enrollee-6 took approximately five trips using Medicaid-funded transportation, but scheduled others that she did not take.

61. Based on my review of records provided by Payment Service-1, I have learned that between in or about April 2018 and in or about June 2018, HECTOR SALAZAR HERRERA, the defendant, paid Medicaid Enrollee-6 on five occasions using Payment Service-1. The payments ranged from \$150 to \$700.

62. Based on my review of records provided by OMIG and my conversations with employees of OMIG, I have learned, in substance and in part, the following:

a. From in or about March 2018 to in or about September 2019, KJ submitted approximately 59 claims for transportation services for a Medicaid Enrollee-6. For these claims, KJ was paid approximately \$5,000.

b. From in or about April 2018 to in or about June 2018, KJ submitted 84 claims for transportation services for Medicaid Enrollee-7. For these claims, KJ was paid approximately \$4,500.

c. From in or about March 2017 to in or about April 2018, KJ submitted 32 claims for transportation services for Medicaid Enrollee-8. For these claims, KJ was paid approximately \$3,000.

63. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-6, Medicaid Enrollee-7, and Medicaid Enrollee-8.

64. Based on my review of records from Dispatch Service-1, I have learned that several trips for Medicaid Enrollee-6, Medicaid Enrollee-7, and Medicaid Enrollee-8 are recorded in KJ's Dispatch System for Driver Number 3, *i.e.*, HECTOR SALAZAR HERRERA, the defendant.

D. Payments from KJ

65. Based on my review of records produced by a particular check-cashing service ("Check-Cashing Company-1"), I have learned that on more than a dozen occasions, an individual matching the appearance of "Hector Salazar Herrera," based on law enforcement records and my personal experience with that individual, cashed checks from KJ at Check-Cashing Company-1. These checks were signed by JORGELINA ABREU GIL or JULIO ALVARADO, the defendants.

66. Based on my review of bank records, I have learned that from in or about January 2018 to in or about December 2019, HECTOR SALAZAR HERRERA, the defendant, received approximately 97 checks from bank accounts belonging to KJ totaling approximately \$805,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

FRANCISCO SALAZAR

A. Medicaid Enrollee-9

67. Based on my conversations with a particular Medicaid enrollee ("Medicaid Enrollee-9"), I have learned, in substance and in part, the following:

a. Prior to 2018, Medicaid Enrollee-9 had used Medicaid-funded transportation for several years. Eventually, an individual named "Franco," who I believe is FRANCISCO SALAZAR, the defendant, became her regular driver.

b. In or about October 2018, Medicaid Enrollee-9 told SALAZAR that she was moving from the Bronx, where she was living at the time, to Brooklyn. Around the same time, SALAZAR proposed to Medicaid Enrollee-9 that she could schedule Medicaid-funded transportation but not take it. In exchange, SALAZAR would pay her weekly.

c. Medicaid Enrollee-9 agreed, and began scheduling transportation rides that she did not take.

d. After she moved to Brooklyn, Medicaid Enrollee-9 took a handful of rides with SALAZAR, but they were not for the purpose of medical transportation.

e. Medicaid Enrollee-9 asked if SALAZAR would give her additional rides, but he stated that he did not go to Brooklyn for trips.

f. On several occasions, SALAZAR asked Medicaid Enrollee-9 to schedule fraudulent trips using her son's Medicaid information. Medicaid Enrollee-9 declined to schedule those trips.

g. SALAZAR did not pay Medicaid Enrollee-9 for anything other than compensation in exchange for the fraudulent trips she scheduled.

68. Based on my review of communications between Medicaid Enrollee-9 and FRANCISCO SALAZAR, the defendant, provided by Medicaid Enrollee-9, I have learned that there are several instances in which Medicaid Enrollee-9 and SALAZAR discussed payments to her for scheduling transportation. In addition, in at least one instance, SALAZAR asks Medicaid Enrollee-9 to "put in my car number 1007" when she schedules trips. In addition, SALAZAR asks Medicaid Enrollee-9 if she knows anyone else who would like to be paid \$100 per week in exchange for their Medicaid information.

69. Based on my review of records from Dispatch Service-1, I have learned that several trips for Medicaid Enrollee-9 are recorded in KJ's Dispatch System for Driver Number 1007, i.e., FRANCISCO SALAZAR, the defendant.

70. Based on my review of records from a particular payment services company ("Payment Service-3"), I have learned that, between October 2018 and July 2019, FRANCISCO SALAZAR, the defendant, sent approximately 30 payments to Medicaid Enrollee-9. The value of the payments ranged from \$50 to \$150.

71. In or about January 2020, Medicaid Enrollee-9 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts FRANCISCO SALAZAR, the defendant, based on law enforcement records, as resembling the person who paid her money in exchange for her Medicaid information.

72. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned, that from September 2018 to December 2019, KJ submitted approximately 284 claims for transportation services for Medicaid Enrollee-9. For these claims, KJ was paid approximately \$30,000.

73. Based on my review of records from Transportation Manager-1, I have learned that KJ submitted to Transportation Manager-1 claims showing approximately 211 trips for Medicaid Enrollee-9 to the address associated with Medical Provider-1. However, based on my review of records from Medical Provider-1, I have learned Medicaid Enrollee-9 was never a patient of Medical Provider-1.

74. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-9.

B. Payments from KJ

75. Based on my review of records produced by Check-Cashing Company-1, I have learned that on more than a dozen occasions, an individual matching the appearance of "Francisco Salazar," based on law enforcement records and an identification document provided by that individual to Check-Cashing Company-1, cashed checks written from KJ to "Francisco Salazar" at Check-Cashing Company-1. These checks were signed by JORGELINA ABREU GIL or JULIO ALVARADO, the defendants.

76. Based on my review of bank records, I have learned that from in or about January 2018 to in or about December 2019, FRANCISCO SALAZAR, the defendant, received approximately 97 checks from bank accounts belonging to KJ totaling approximately \$125,000. The checks were all signed by

JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

YESENIA RODRIGUEZ

A. Medicaid Enrollee-10

77. Based on my conversations with a particular Medicaid enrollee ("Medicaid Enrollee-10") and my conversation with other law enforcement officers who have communicated with Medicaid Enrollee-10, I have learned, in substance and in part, the following:

a. In or about November 2018, Medicaid Enrollee-10 learned from a friend, a particular Medicaid Enrollee ("Medicaid Enrollee-11"), that she could receive payment in exchange for her Medicaid information.

b. In or about November 2018, Medicaid Enrollee-10 sent her information to Medicaid Enrollee-11. Medicaid Enrollee-11 informed Medicaid Enrollee-10 that "Yessenia" would reach out to her.

c. Soon thereafter, an individual, later known to be YESENIA RODRIGUEZ, the defendant, reached out to Medicaid Enrollee-10 and informed her that she would need to visit a therapist's office first before she could receive any payment. RODRIGUEZ also offered to give Medicaid Enrollee-10 \$50 for anyone she could refer to RODRIGUEZ. Medicaid Enrollee-10 agreed and referred her mom, who was also enrolled in Medicaid ("Medicaid Enrollee-12").

d. Subsequently, RODRIGUEZ picked up Medicaid Enrollee-10, Medicaid Enrollee-12, and Medicaid Enrollee-11 and drove them to a particular medical provider ("Medical Provider-2"), located at a particular location in Brooklyn, New York ("Brooklyn Address-2"). Before arriving, RODRIGUEZ told Medicaid Enrollee-10 to say that she had certain pain when questioned by the therapist.

e. When they arrived, Medicaid Enrollee-10 was seen by a therapist and received a massage. Before she left, office staff at Medical Provider-2 asked her which days each week she would like to return for future visits.

f. Later, on one other occasion, RODRIGUEZ again drove Medicaid Enrollee-10, Medicaid Enrollee-12, and Medicaid Enrollee-11 to Medical Provider-2.

g. After the first visit, RODRIGUEZ began regularly sending \$100 payments to Medicaid Enrollee-10.

h. Those payments continued until approximately in or about November 2019.

i. In total, Medicaid Enrollee-10 only took approximately three to four trips with KJ.

78. Based on my review of communications between Medicaid Enrollee-10 and YESENIA RODRIGUEZ, the defendant, provided by Medicaid Enrollee-10, I have learned that, on several occasions between November 2018 and November 2019, Medicaid Enrollee-10 and RODRIGUEZ discuss payments from RODRIGUEZ. I have also reviewed communications between Medicaid Enrollee-10 and Medicaid Enrollee-11, provided by Medicaid Enrollee-10, which also show discussions about payments from RODRIGUEZ.

79. Based on my review of law enforcement records, I have learned that, in or about August 2019, YESENIA RODRIGUEZ, the defendant, entered the United States through an international airport in Newark, New Jersey, and told CBP officers that she worked as a medical transportation manager and that her company provided transportation to individuals who have Medicaid.⁵

80. Based on my review of records from Payment Service-1, I have learned that from November 2018 to January 2019, a Payment Service-1 user named "Yesenia Rodriguez" paid Medicaid Enrollee-10 on 11 occasions. The individual payments ranged from \$100 to \$200.

81. Based on my review of bank records, I have learned that a user operating a bank account held in the name "Yesenia L Rodriguez" transferred money to Medicaid Enrollee-10 on more than a dozen occasions using Payment Service-2. The individual payments ranged from \$100 to \$300.

82. Based on my review of records from Dispatch Service-1, I have learned that several trips for Medicaid Enrollee-10 are recorded in KJ's Dispatch System for Driver

⁵ In addition, YESENIA RODRIGUEZ, the defendant, provided a particular phone number for her contact information (the "Rodriguez Phone Number"). Records from Payment Service-1 show that the Rodriguez Phone Number was used by the Payment Service-1 user who sent money to Medicaid Enrollee-10.

Numbers 1, 2166, 2169, 2193, *i.e.*, YESENIA RODRIGUEZ, the defendant.

83. On or about December 9, 2019, Medicaid Enrollee-10 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts YESENIA RODRIGUEZ, the defendant, based on law enforcement records, as the person who had paid her money in exchange for her Medicaid information.

84. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned, in substance and in part, the following:

a. From in or about November 2018 to in or about December 2019, KJ submitted approximately 287 claims for transportation services for a Medicaid Enrollee-10. For these claims, KJ was paid approximately \$58,000.

b. From in or about November 2018 to in or about September 2019, KJ submitted approximately 237 claims for transportation services for a Medicaid Enrollee-12. For these claims, KJ was paid approximately \$54,000.

c. From in or about October 2018 to in or about December 2019, KJ submitted approximately 284 claims for transportation services for a Medicaid Enrollee-11. For these claims, KJ was paid approximately \$59,000.

85. As set forth above, the approximately 287 claims KJ submitted for transportation services for Medicaid Enrollee-10 far exceeded the three to four trips Medicaid Enrollee-10 actually took with KJ.

86. Based on my review of records provided by Transportation Manager-1, I have learned that that nearly all of KJ's claims for transporting Medicaid Enrollee-10, Medicaid Enrollee-12, and Medicaid Enrollee-11, state that the customers travelled between locations in the Bronx and a Brooklyn Address-2, the location of Medical Provider-2.

87. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to nearly all of KJ's claims for transporting Medicaid Enrollee-10, Medicaid Enrollee-12, and Medicaid Enrollee-11.

B. Payments from KJ

88. Based on my review of bank records, I have learned that from in or about April 2018 to in or about December 2019, YESENIA RODRIGUEZ, the defendant, received approximately 59 checks from bank accounts belonging to KJ totaling approximately \$295,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

89. Based on my review of email correspondence, I have learned, in substance and in part, the following:

a. On or about May 16, 2019, YESENIA RODRIGUEZ, the defendant, sent an email to KJ Email Account-1.

b. The email contained an attachment listing each day between May 13, 2019, and May 18, 2019. For each day, RODRIGUEZ listed several individuals and dollar amounts ranging from \$30 to \$110. The individuals listed included Medicaid Enrollee-10, Medicaid Enrollee-12, and Medicaid Enrollee-11.

c. Each day had a total dollar amount, and then there was a sum total for all days equal to \$12,230. RODRIGUEZ then had a line noting "-20%" and subtracting \$2,446, *i.e.*, 20% of \$12,230. Finally, there was an indicated total value of \$9,784.

90. Based on my review of bank records, I have learned that, on or about, May 16, 2019, KJ issued a check to YESENIA RODRIGUEZ, the defendant, worth \$9,784. The check was signed by JULIO ALVARADO, the defendant, and contained "01" in the memo line, *i.e.*, RODRIGUEZ's driver number.

91. Based on my review of records produced by Check-Cashing Company-1, I have learned that, on two occasions in February 2019 and March 2019, an individual matching the appearance of YESENIA RODRIGUEZ, the defendant, based on the identification made by Medicaid Enrollee-10, cashed checks from KJ at Check-Cashing Company-1. These checks were signed by JULIO ALVARADO, the defendant.

JOSE RIVERA

A. Medicaid Enrollee-13

92. Based on my communications with law enforcement officers who have spoken with a particular Medicaid enrollee ("Medicaid Enrollee-13") and my review of law enforcement

records, I have learned, in substance and in part, the following:

a. In or about late-2019, Medicaid Enrollee-13 went to a regular appointment at a treatment program at a clinic in the Bronx. When she was leaving, she encountered an individual ("Co-Conspirator-3") who was advertising that he could pay individuals for taxi rides if they were members of the treatment program. Medicaid Enrollee-13 expressed interested. Co-Conspirator-3 stated that if Medicaid Enrollee-13 had her treatment program identification card with her, he could take her then to see his boss. Medicaid Enrollee-13 had her treatment program card.

b. Co-Conspirator-3 took Medicaid Enrollee-13, along with two other individuals who were likely treatment program members, to a particular location in the Bronx. Co-Conspirator-3, Medicaid Enrollee-13, and the two other treatment program members traveled to the particular location in a taxi cab.

c. At the location, everyone got out of the taxi and Co-Conspirator-3 spoke to a particular individual in another vehicle. That individual placed a phone call.

d. A few minutes later, the Co-Conspirator-3's boss, who I believe to be JOSE RIVERA, the defendant, came out of a nearby building. RIVERA approached the three treatment program members and told them that as long as they were not working with another taxi company, he could pay them \$50 per week. RIVERA paid each treatment program member \$50 in cash and gave them his phone number (the "Rivera Phone Number"). He told them to contact him the following week so that he could continue to pay them. RIVERA took a picture of each individual's treatment program card.

e. Co-Conspirator-3, Medicaid Enrollee-13, and the other two treatment program members left in a taxi. During that trip, Co-Conspirator-3 instructed the treatment program members that they would be paid but that the company would not be providing any taxi service.

f. Medicaid Enrollee-13 subsequently contacted RIVERA at the Rivera Phone Number.

g. In or about December 2019 and January 2020, RIVERA paid Medicaid Enrollee-13 several times using Payment Service-1. RIVERA initially paid Medicaid Enrollee-13 small

payments of approximately \$20 while he told her he was trying to work things out with Medicaid. Later, he paid her several payments of approximately \$50 or \$100.

h. In or about late-January 2020, Medicaid Enrollee-13 told RIVERA she no longer wanted to continue their arrangement.

i. Medicaid Enrollee-13 never took a Medicaid-funded trip with RIVERA or KJ.

93. Based on my communications with law enforcement officers who have spoken with Medicaid Enrollee-13 and my review of law enforcement records, I have learned, in substance and in part, that Medicaid Enrollee-13 allowed law enforcement officers to review the contents of her mobile phone. Based on my review of records related to that review, I have learned the following:

a. JOSE RIVERA, the defendant, paid Medicaid Enrollee-13 on six occasions in December 2019 and January 2020 using Payment Service-1. The payments ranged from \$20 to \$100.

b. Between October 2019 and January 2020, RIVERA and Medicaid Enrollee-13 exchanged a series of text messages in which they discuss medical transportation and payments to Medicaid Enrollee-13. Among other things, on or about December 6, 2019, RIVERA messaged Medicaid Enrollee-13 to tell her that she had to choose between using the taxi service and being paid. Medicaid Enrollee-13 responded that she would prefer to be paid.

94. On or about January 29, 2020, I reviewed the contents of a mobile phone belonging to JOSE RIVERA, the defendant (the "Rivera Mobile Phone"), while RIVERA was entering the United States at an international airport in the New York area. During that review, I observed the following:

a. RIVERA had a contact saved in his phone that references the first name of Medicaid Enrollee-13 and the phone number she uses.

b. The Rivera Mobile Phone showed the text message communication with Medicaid Enrollee-13 that I also observed on her phone.

95. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned that, from in or about December 2019 to in or about January 2020, KJ

submitted approximately 5 claims for transportation services for Medicaid Enrollee-13. For these claims, KJ was paid approximately \$960.⁶

96. As set forth above, although KJ submitted approximately 5 claims for transporting Medicaid Enrollee-13, Medicaid Enrollee-13 did not take Medicaid-funded transportation with KJ.

97. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-13.

B. Messages with Co-Conspirator-4

98. As set forth above, on or about January 29, 2020, I reviewed the contents of the Rivera Mobile Phone. Among other things, I observed a text message exchange between JOSE RIVERA, the defendant, and another individual ("Co-Conspirator-4") from in or about July 2018 to January 2019. From that text message exchange, I have learned, in substance and in part, the following:

a. On several occasions from July 2018 to January 2019, RIVERA and Co-Conspirator-4 discuss KJ and weekly payments. Among other things, Co-Conspirator-4 noted that he "need[ed] money to pay this lady."

b. On or about October 15, 2019, Co-Conspirator-4 sent a message to RIVERA stating:

I gave him to him the money he said ,he is not happy about the fact that he has to wait for his other 100\$,I to old him to be polite cuz that's how things are taking care of appropriately,he said that he don't give a fuck if his money is not in his hand by 12pm tonight he is calling the dept of health ,kj and [Transportation Manager-1] and 911 if he has to ,OMG what do I do now

c. On or about the same day, Co-Conspirator-4

⁶ Records provided by Transportation Manager-1 show that KJ submitted two more claims for transportation services for Medicaid Enrollee-13 in late-January 2020 that were not reflected in the OMIG data that I received.

stated that he was contacting his "clients" to ask them to "get that form filled out this week so in the following weeks to come we can count on an income." Based on my experience, I believe Co-Conspirator-4 is referring to the Form 2015, which was generally required in order to submit claims through Transportation Manager-1.

d. The contact card for Co-Conspirator-4 identifies him by first name and "worker." On more than one occasion during the chats, Co-Conspirator-4 refers to RIVERA as "boss."

e. On or about July 17, 2019, Co-Conspirator-4 requested to speak to RIVERA's boss at KJ. RIVERA responded that he, meaning RIVERA, will speak to the boss because "he don't like to see or speak by phone with nobody." RIVERA stated that "tomorrow I'll talk to Him." RIVERA added that "[i]f you want to talk with him we have to go in person."

f. On several occasions, RIVERA and Co-Conspirator-4 exchanged information for Medicaid enrollees.

C. Medicaid Enrollee-14

99. As set forth above, on or about January 29, 2020, I reviewed the contents of the Rivera Mobile Phone. Among other things, I observed a text message exchange between JOSE RIVERA, the defendant, and Co-Conspirator-4 from in or about July 2018 to January 2019. From that text message exchange, I have learned, in substance and in part, the following:

a. On or about July 18, 2019, Co-Conspirator-4 stated "I got a few do u want me send it with yours so when u go to the office u got them in." Co-Conspirator-4 then provided the names, dates of birth, Medicaid numbers, and "old" and "new" addresses for two individuals, along with the last four digits of their social security numbers.

b. Among the two individuals listed was a particular Medicaid enrollee ("Medicaid Enrollee-14"). The text message from Co-Conspirator-4 listed an "old" address for the Medicaid Enrollee-14, which was in the Bronx, and a "new" address for Medicaid Enrollee-14, which was in Brooklyn ("Brooklyn Address-3").

c. Co-Conspirator-4 stated that both individuals had the same "new" address, Brooklyn Address-3. Co-Conspirator-4 also listed a particular address in the Bronx

("Bronx Address-1") and indicated that address applied to both individuals in his text messages.

100. Based on my review of records provided by OMIG, I have learned, in substance and in part, the following:

a. From in or about July 2019 to in or about October 2019, KJ submitted approximately 73 claims for transportation services for Medicaid Enrollee-14.

b. Specifically, KJ claimed to begin transporting Medicaid Enrollee-14 on July 18, 2019, *i.e.*, the same day Co-Conspirator-4 sent RIVERA a message with Medicaid Enrollee-14's information, and the same day Co-Conspirator-4 noted that RIVERA would be going to "the office."

c. KJ claimed to provide transportation services to Medicaid Enrollee-14 six days per week, each week, until October 10, 2019.

d. For these claims, KJ was paid approximately \$10,000.

101. Based on my review of records provided by Transportation Manager-1, I have learned that for each of the claims it submitted for Medicaid Enrollee-14, KJ claimed to be transporting the enrollee from Brooklyn Address-3 to Bronx Address-1, and back.

102. Based on my communications with Medicaid Enrollee-14, I have learned, in substance and in part, the following:

a. Medicaid Enrollee-14 has never taken Medicaid-funded transportation.

b. Medicaid Enrollee-14 has lived in the Bronx for the past three years and infrequently leaves to go to other boroughs. In addition, she infrequently goes to the doctor, and when she goes it is typically within walking distance.

c. Medicaid Enrollee-14 has never been offered payment in exchange for the use of her Medicaid information.

d. Medicaid Enrollee-14 lost her Medicaid card approximately one year ago and has since received a replacement card.

103. Based on my review of records from Dispatch

Service-1, I have learned that several trips for Medicaid Enrollee-14 are recorded in KJ's Dispatch System for Driver Number 20, *i.e.*, a Driver Number associated with JOSE RIVERA, the defendant.

104. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to all of KJ's claims for transporting Medicaid Enrollee-14.

D. Payments from KJ

105. Based on my review of bank records, I have learned that from on or about October 2018, up to on or about December 2019, JOSE RIVERA, the defendant, received approximately 91 checks from bank accounts belonging to KJ totaling approximately \$450,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

106. Based on my review of records produced by a particular check-cashing service ("Check-Cashing Company-2"), I have learned that, on several occasions in November 2018 and December 2018, an individual that I believe matches the appearance of JOSE RIVERA, the defendant, cashed checks from KJ at Check-Cashing Company-2. These checks were signed by JULIO ALVARADO, the defendant.

JOSE JIMENEZ HIDALGO and VICTORIA PALMA

A. Medicaid Enrollee-15

107. Based on my conversations with a particular Medicaid enrollee ("Medicaid Enrollee-15"), I have learned, in substance and in part, the following:

a. For approximately the past ten years, Medicaid Enrollee-15 has lived at a location in the Bronx with her two children, including Medicaid Enrollee-16.

b. Medicaid Enrollee-15 was referred to a particular physician's office in the Bronx for medical services ("Medical Provider-3"). She was referred to Medical Provider-3 by another Medicaid enrollee.

c. Approximately one year ago, Medicaid Enrollee-15 went to Medical Provider-3. During her visit with a physician, she was asked whether she wanted to use Medicaid-

funded transportation. She responded yes.

d. Medicaid Enrollee-15 was taken to the receptionist area of Medical Provider-3. Near that area, she met an individual, known to her as "David" but later known to be JOSE JIMENEZ HIDALGO, the defendant, who offered to pay her \$40 weekly if she used his medical transportation service. "David" offered to pay Medicaid Enrollee-15 an additional \$40 for Medicaid information belonging to Medicaid Enrollee-15's daughter, Medicaid Enrollee-16, who was also present at Medical Provider-3.

e. Medicaid Enrollee-15 agreed to accept payment in exchange for scheduling rides through "David" and providing Medicaid Enrollee-16's Medicaid information.

f. Over the next several months, Medicaid Enrollee-15 scheduled and took approximately six or seven trips for medical transportation through David. Medicaid Enrollee-16 received transportation services from KJ on a handful of occasions or as much as once per week.

g. During that time, David paid Medicaid Enrollee-15 approximately \$80 per week, although the exact amount varied each week. David paid her cash in person in some instances, and in other instances through Payment Service-1 or Payment Service-3.

h. On certain occasions, either "Victoria," later known to be VICTORIA PALMA BREA, the defendant, or another particular individual ("Co-Conspirator-5"), paid Medicaid Enrollee-15 in lieu of David.

i. On two occasions, Victoria met with Medicaid Enrollee-15 to pay her cash as part of her weekly payment from David. On one of those occasions, Victoria arrived with David.

j. On two occasions, Victoria paid Medicaid Enrollee-15 using Western Union instead of meeting in person to pay cash.

k. After several months, Medicaid Enrollee-15 stopped receiving payments from David, Victoria, or Co-Conspirator-5.

l. In total, Medicaid Enrollee-15 took approximately six or seven trips with KJ. Medicaid Enrollee-16 took a handful of trips with KJ and no more than one per week.

108. Based on my review of records provided by Payment Service-1, I have learned that, on seventeen occasions from in or about February 2019 to in or about July 2019, JOSE JIMENEZ HIDALGO, the defendant, sent funds to Medicaid Enrollee-15. The payments ranged from \$20 to \$160 and totaled approximately \$1,600.

109. Based on my review of records provided by Payment Service-3, I have learned that, on or about March 8, 2019, and on or about March 17, 2019, an individual named "Victoria Palma" sent \$100 and \$88, respectively, to Medicaid Enrollee-15 using Payment Service-3.

110. Based on my review of chat communications on the WhatsApp platform, obtained from Medicaid Enrollee-15's mobile phone, I have learned, in substance and in part, that, on several occasions in 2019, Medicaid Enrollee-15 communicated with an individual identified in her mobile phone as "David Medicaid." The phone number associated with "David Medicaid" is a phone number associated with JOSE JIMENEZ HIDALGO, the defendant, through records from Payment Service-1. Conversations between Medicaid Enrollee-15 and HIDALGO included references to Medical Provider-3, payments via Payment Service-2, and requests from HIDALGO for Medicaid information for Medicaid Enrollee-15 and Medicaid Enrollee-16.

111. In or about January 2020, Medicaid Enrollee-15 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts JOSE JIMENEZ HIDALGO, the defendant, based on law enforcement records, as the person who paid her money in exchange for her Medicaid information.

112. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned that, from in or about November 2018 to in or about August 2019, KJ submitted approximately 136 claims for transportation services for Medicaid Enrollee-15. For these claims, KJ was paid approximately \$18,000.

113. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned that, from in or about November 2018 to in or about August 2019, KJ submitted approximately 171 claims for transportation services for Medicaid Enrollee-16. The claims purportedly related to transportation five or six times each week from in or about November 2018 to in or about August 2019. For these claims, KJ was paid approximately \$22,000.

114. As set forth above, the approximately 139 claims KJ submitted for transportation services for Medicaid Enrollee-15 far exceeded the six or seven trips Medicaid Enrollee-15 actually took with KJ.

115. As set forth above, the approximately 171 claims KJ submitted for transportation services for Medicaid Enrollee-16 several times per week far exceeded the handful of trips, no more than once per week, that Medicaid Enrollee-16 actually took with KJ.

116. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant attested to each of KJ's claims for transporting Medicaid Enrollee-15 or Medicaid Enrollee-16.

B. Payments from KJ

117. Based on my review of bank records, I have learned that from in or about May 2018 to in or about June 2019, JOSE JIMENEZ HIDALGO, the defendant, received approximately 53 checks from bank accounts belonging to KJ totaling approximately \$185,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

CRISTOPHER SANTOS FELIX, VICTORIA PALMA, and JOHN MANUEL MEJIA

A. Medicaid Enrollee-17 and Medicaid Enrollee-18

118. Based on my review of law enforcement records, I have learned that CRISTOPHER SANTOS FELIX, the defendant, is the spouse of VICTORIA PALMA BREA, the defendant.

119. Based on my review of law enforcement records, I have learned that, in 2018 and until CRISTOPHER SANTOS FELIX, the defendant, was arrested and imprisoned in or about March 2019, SANTOS FELIX and VICTORIA PALMA BREA, the defendant, lived together.

120. Based on my communications with a particular Medicaid enrollee ("Medicaid Enrollee-17") and my communications with other law enforcement officers who have communicated with Medicaid Enrollee-17, I have learned, in substance and in part, the following:

a. Medicaid Enrollee-17 has lived at a particular address in the Bronx, New York, since 2013. Medicaid Enrollee-17 has a minor child ("Medicaid Enrollee-18").

b. In or about 2017, Medicaid Enrollee-17 met CRISTOPHER SANTOS FELIX, the defendant.

c. In or about early-2018, SANTOS FELIX approached Medicaid Enrollee-17 and asked if she was enrolled in Medicaid. When she responded that she was, he inquired further about Medicaid-funded transportation.

d. SANTOS FELIX told her that he would give her \$75 per week if she booked Medicaid-funded transportation trips through Transportation Manager-1 and requested KJ, but did not take the trips. SANTOS FELIX instructed her that she should book trips six days per week, Monday through Saturday. SANTOS FELIX added that Medicaid Enrollee-17 could earn an additional \$75 per week if she also booked rides through Transportation Manager-1 for her minor daughter.

e. SANTOS FELIX instructed Medicaid Enrollee-17 that, if she agreed to book the rides, she should say that she is coming from a particular starting location in Brooklyn, New York, that he provided, rather than from her actual home address in the Bronx. In sum and in substance, he told her that this was necessary because a trip from the Bronx would not have enough miles.

f. Medicaid Enrollee-17 agreed to SANTOS FELIX's plan and began requesting trips through Transportation Manager-1 for her and her daughter.

g. On more than one occasion, SANTOS FELIX personally gave her cash in exchange for the rides she scheduled through Transportation Manager-1, which she did not take, and for which she requested KJ.

h. On other occasions, SANTOS FELIX would communicate with Medicaid Enrollee-17 about her KJ transportation but SANTOS FELIX's wife, VICTORIA PALMA BREA, the defendant, would visit Medicaid Enrollee-17 to give her money. PALMA BREA met Medicaid Enrollee-17 several times to deliver the weekly payments owed to Medicaid Enrollee-17.

i. Eventually, SANTOS FELIX instructed Medicaid Enrollee-17 to communicate with JOHN MANUEL MEJIA, the defendant, known to Medicaid Enrollee-17 as "Manuel."

j. To receive funds, Medicaid Enrollee-17 sent weekly screenshots to MEJIA. The screenshot showed a page of the Transportation Manager-1 website where Medicaid Enrollee-17 had

scheduled trips and requested KJ as the transportation provider.

k. There came a time when Transportation Manager-1 required Medicaid Enrollee-17 to obtain a Form 2015.

l. During the time Medicaid Enrollee-17 was obtaining a Form 2015 and Transportation Manager-1 was reviewing it, Medicaid Enrollee-17 was not able to schedule rides through Transportation Manager-1. During this period, SANTOS FELIX, PALMA BREA, and MEJIA all contacted Medicaid Enrollee-17 to find out when she would be eligible for transportation again, *i.e.*, when she could resume scheduling fraudulent trips.

m. Despite requesting trips from KJ, Medicaid Enrollee-17 and Medicaid Enrollee-18 never, in fact, took a ride with KJ.

121. Based on my review of communications between Medicaid Enrollee-17 and JOHN MANUEL MEJIA, the defendant,⁷ I have learned that, on several occasions between in or about October 2018 and in or about May 2019, Medicaid Enrollee-17 informed MEJIA that she had scheduled transportation rides and Medicaid Enrollee-17 or MEJIA discussed payments to Medicaid Enrollee-17. In several instances, Medicaid Enrollee-17 sent pictures of the Transportation Manager-1 website confirming that she had scheduled trips with KJ.

122. Based on my review of communications between Medicaid Enrollee-17 and VICTORIA PALMA BREA, the defendant, I have learned that, on several occasions in or about August 2019 and September 2019, Medicaid Enrollee-17 informed PALMA BREA that she had scheduled transportation rides and Medicaid Enrollee-17 or PALMA BREA discussed payments to Medicaid Enrollee-17. At the time, and at the direction of PALMA BREA, Medicaid Enrollee-17 was scheduling fraudulent transportation rides with a transportation provider other than KJ.

123. Based on my review of Medicaid Enrollee-17's mobile phone and an application associated with Payment Service-2, I have learned that, from in or about October 2018 to in or about May 2019, VICTORIA PALMA BREA and JOHN MANUEL MEJIA, the defendants, sent Medicaid Enrollee-17 payments on several

⁷ These communications and others referenced in this Complaint are in Spanish. For communication in Spanish, I have reviewed English language translations or I have communicated with other law enforcement officers who are proficient in Spanish.

occasions using Payment Service-2. These payments were for either \$75 or \$150. Based on my conversations with Medicaid Enrollee-17, I have learned that Medicaid Enrollee-17 believes the Payment Service-2 transfers from user "Victoria Palma," represented payments from VICTORIA PALMA BREA's, the defendant's, husband, CRISTOPHER SANTOS FELIX, the defendant.

124. In or about December 2019, Medicaid Enrollee-17 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts CRISTOPHER SANTOS FELIX, the defendant, based on law enforcement records, as the person who paid her money in exchange for her Medicaid information.⁸

125. In or about December 2019, Medicaid Enrollee-17 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts VICTORIA PALMA BREA, the defendant, based on law enforcement records, as the person who paid her money in exchange for her Medicaid information.

126. In or about December 2019, Medicaid Enrollee-17 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts JOHN MANUEL MEJIA, the defendant, based on law enforcement records, as the person who paid her money in exchange for her Medicaid information.

127. Based on my review of Medicaid Enrollee-17's phone, I have learned that she has a contact in her phone named "Christopher Neighbor" with a particular phone number.

128. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned that,

⁸ Based on my conversations with Medicaid Enrollee-17 and my conversations with law enforcement officers who have communicated with her, I have learned that Medicaid Enrollee-17 believes CRISTOPHER SANTOS FELIX, the defendant, was arrested earlier because he assaulted a law enforcement officer (the "Santos Felix Assault Case"). I was personally involved in investigating the Santos Felix Assault Case and I was involved in arrested "Cristopher Santos Felix" pursuant to that case. Based on my observations in arresting "Cristopher Santos Felix" in that case, I believe the person arrested in that assault case is the same person identified by Medicaid Enrollee-17 during the simultaneous photo array described above.

from in or about February 2018 to in or about May 2019, KJ submitted approximately 237 claims for transportation services for a Medicaid Enrollee-17. For these claims, KJ was paid approximately \$35,000.

129. Based on my review of records provided by OMIG and my communications with OMIG employees, I have learned that, from in or about March 2018 to in or about December 2018, KJ submitted approximately 125 claims for transportation services for a Medicaid Enrollee-18. For these claims, KJ was paid approximately \$17,000.

130. Although KJ submitted more than 350 total claims for transportation for Medicaid Enrollee-17 and Medicaid Enrollee-18, neither individual ever used Medicaid-funded transportation services from KJ.

131. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-17 or Medicaid Enrollee-18.

B. Payments from KJ

132. Based on my review of bank records, I have learned that from in or about February 2018 to in or about December 2018, CRISTOPHER SANTOS FELIX, the defendant, received approximately 80 checks from bank accounts belonging to KJ totaling approximately \$345,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

133. Based on my review of records produced by Check-Cashing Company-2, I have learned, in substance and in part, that CRISTOPHER SANTOS FELIX, the defendant, has an account at Cash-Checking Company-2. Account records show that, on several occasions in 2018, SANTOS FELIX cashed checks from KJ that were addressed to him. Based on those checks, SANTOS FELIX received tens of thousands of dollars in cash.

134. Based on my review of bank records, I have learned that from in or about January 2018 to in or about September 2019, VICTORIA PALMA BREA, the defendant, received approximately 25 checks from bank accounts belonging to KJ totaling approximately \$100,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

135. Based on my review of bank records, I have learned that from in or about January 2018 to in or about December 2019, JOHN MANUEL MEJIA, the defendant, received approximately 175 checks from bank accounts belonging to KJ totaling approximately \$434,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

FABIAN MORGAN

A. Instructions to Co-Conspirator-6

136. Based on my conversations with a particular individual ("Co-Conspirator-6"),⁹ I have learned, in substance and in part, the following:

a. In 2018, FABIAN MORGAN, the defendant, approached Co-Conspirator-6 and informed her that she and her children could receive Medicaid-funded transportation through MORGAN's employer, KJ. Co-Conspirator-6 expressed interest, and provided her and her children's names, social security numbers, Medicaid identification numbers, dates of birth, and addresses. MORGAN recorded this information on a tablet computer. Despite giving their information, neither MORGAN nor her children ever took Medicaid-funded transportation with KJ.

b. In or about fall 2018, Co-Conspirator-6 worked for FABIAN MORGAN, the defendant, for several weeks.

c. As her principal responsibility, MORGAN directed Co-Conspirator-6 to make calls to Transportation Manager-1 scheduling trips on behalf of other individuals.

d. Co-Conspirator-6 worked at MORGAN's home at a particular address in the Bronx (the "Morgan Address"). MORGAN provided a tablet computer, similar to the one he used to record Co-Conspirator-6's Medicaid information, with the individuals' Medicaid and personal identifying information.

e. MORGAN instructed Co-Conspirator-6 to call Transportation Manager-1 and request Medicaid-funded transportation on behalf of the individuals referenced on the

⁹ Co-Conspirator-6 is providing information in the hopes of obtaining a non-prosecution or cooperation agreement. Information provided by Co-Conspirator-6 has proven to be reliable and has been corroborated by law enforcement officers.

tablet computer he provided her.

f. In particular, MORGAN instructed Co-Conspirator-6 to request "outstanding" orders, *i.e.*, standing orders, for trips four to six days per week. He further instructed her to mix up the days for the orders. He preferred for the destination of these trips to be Brooklyn Address-2, associated with Medical Provider-2. MORGAN instructed Co-Conspirator-6 to say that she worked at Medical Provider-2 when she introduced herself at the beginning of her calls with Transportation Manager-1.

g. MORGAN instructed Co-Conspirator-6 that, if the operator at Transportation Manager-1 requested a Form 2015, she should tell the operator that the form would be completed in the future. MORGAN further instructed Co-Conspirator-6 that if she was asked a question she could not answer, she should hang up and call back later.

h. For several weeks, Co-Conspirator-6 made calls to Transportation Manager-1 consistent with MORGAN's instructions to her.

i. Furthermore, on one occasion, Co-Conspirator-6 took a trip with KJ that was not Medicaid-related but she nevertheless saw the driver record the trip on a form associated with Medicaid trips.

137. Based on my review of Transportation Manager-1 records reflecting customer complaints against KJ, I have learned that, on or about May 6, 2019, Co-Conspirator-6 called Transportation Manager-1 to say that someone had been using her Medicaid information to set up trips, that she did not set up those trips, and that she had never been to the destination of the purported trips.

B. Calls by Co-Conspirator-6

138. Based on my conversations with Co-Conspirator-6, I have learned that she used a particular phone number (the "Co-Conspirator-6 Phone Number").

139. Based on my review of records from Transportation Manager-1, I have learned that in November 2018 and December 2018, there were approximately 58 calls between the Co-Conspirator-6 Phone Number and Transportation Manager-1. Based on my review of audio recordings of these calls and my discussions with other law enforcement officers who have

reviewed the calls, I have learned, in substance and in part, the following:

a. On the calls, a female caller, later known to be Co-Conspirator-6, identifies herself using her true first name or her first name and the initial of her last name.

b. Co-Conspirator-6 also states that she works at Medical Provider-2.

c. Co-Conspirator-6 attempts to schedule trips - typically standing orders - on behalf of several individuals.

d. On at least two instances, Co-Conspirator-6 called attempting to schedule trips for YESENIA RODRIGUEZ, the defendant.

C. Calls by MORGAN

140. Based on my review of records provided by a telecommunications company, I have learned that, from in or about February 2017 to in or about August 2018, a particular phone number (the "Morgan Phone Number") was registered to "Mr. Morgan." In or about August 2018, that phone number was registered to "Fabian P. Morgan" at the Morgan Address. From in or about August 2018 to at least in or about July 2019, the Morgan Phone Number was registered to an account in the name "KJ TRANSPORTATION" at the Morgan Address.¹⁰

141. Based on my review of records produced by Transportation Manager-1, I have learned that, from in or about December 2017 to in or about December 2018, there were approximately 260 calls between Transportation Manager-1 and the Morgan Phone Number. Based on my review of audio recordings of these calls and my discussions with other law enforcement officers who have reviewed the calls, I have learned, in substance and in part, the following:

a. On several calls, a male caller, later identified by Co-Conspirator-6 as FABIAN MORGAN, the defendant, calls to place standing orders on behalf of other individuals. On several calls, the caller states that he is "Fabian Morgan"

¹⁰ In addition, based on my review of records provided by WhatsApp and publicly available records, I have learned that the Morgan Phone Number is associated with a user account that, as of December 2019, has a profile picture depicting FABIAN MORGAN, the defendant.

from Medical Provider-2 calling on behalf of a client.

b. On other calls, MORGAN calls purporting to be several different individuals. On these calls too, he attempts to schedule trips.

c. On four occasions in February 2018, September 2018, and December 2018, MORGAN called Transportation Manager-1, attempting to schedule trips for YESENIA RODRIGUEZ, the defendant.

d. On or about July 5, 2018, MORGAN called Transportation Manager-1 purporting to be Co-Conspirator-6 and seeking to schedule transportation to a particular address in Brooklyn.

e. On three occasions in or about May 2018 and June 2018, MORGAN called Transportation Manager-1, posing as a particular individual known to be the brother of HECTOR SALAZAR HERRERA, the defendant, based on a review of law enforcement records. On two of these calls, MORGAN provided the wrong date of birth.

f. On four occasions in or about May 2018 and June 2018, MORGAN called Transportation Manager-1, seeking to schedule transportation for a particular individual known to be the mother of HECTOR SALAZAR HERRERA, the defendant, based on a review of law enforcement records. MORGAN states that the Medicaid enrollee is his mother. On one call, MORGAN begins the call and hands it to another caller who appears to be a female.

g. On or about October 22, 2018, MORGAN called Transportation Manager-1, identifying himself as "Fabian M." from Medical Provider-2. During the call, he sought to schedule an "outstanding order," i.e., a standing order, for Medicaid Enrollee-11.

h. On several instances, a female caller, later known to be Co-Conspirator-6, called Transportation Manager-1 from the Morgan Phone Number identifying herself by first name as Co-Conspirator-6 and stating that she worked at Medical Provider-2.¹¹

142. In or about November 2019, Co-Conspirator-6 was

¹¹ As noted above, Co-Conspirator-6 also made calls to Transportation Manager-1, at the direction of FABIAN MORGAN, the defendant, using the Co-Conspirator-6 Phone Number.

asked to listen to a sample set of recordings of calls between the Morgan Phone Number and Transportation Manager-1. Co-Conspirator identified the male caller in the recordings as FABIAN MORGAN, the defendant. Co-Conspirator-6 also listened to a sample set of recordings from the Co-Conspirator-6 Phone Number and confirmed that she was the caller who identified herself by Co-Conspirator-6's first name.

143. Based on my communications with Medical Provider-2 and my review of records provided by Medical Provider-2, I have learned that, contrary to statements they made on calls to Transportation Manager-1, neither FABIAN MORGAN, the defendant, nor Co-Conspirator-6 were ever employees of Medical Provider-2.

D. Payments from KJ

144. Based on my review of bank records, I have learned that from in or about April 2018 to in or about December 2019, FABIAN MORGAN, the defendant, received approximately 99 checks from bank accounts belonging to KJ totaling approximately \$207,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

145. Based on my review of records produced by Check-Cashing Company-1, I have learned that on more than ten occasions, an individual matching the appearance of FABIAN MORGAN, the defendant, cashed checks from KJ at Check-Cashing Company-1. These checks were signed by JULIO ALVARADO, the defendant.

ZORAIDA GONAZALEZ and NELSON DIAZ, a/k/a "Abdul Alamin"

A. Medicaid Enrollee-19

146. Based on my review of records provided by Transportation Manager-1, I have learned that, in nearly all of KJ's claims related to a particular Medicaid enrollee ("Medicaid Enrollee-19"), the company claimed that it was transporting Medicaid Enrollee-19 between a particular address in Brooklyn, New York ("Brooklyn Address-4"), and a particular address in the Bronx, New York ("Bronx Address-2"). JORGELINA ABREU GIL, the defendant, attested to each of KJ's claims for transporting Medicaid Enrollee-19.

147. Based on my conversations with OMIG employees and my review of records provided by OMIG, I have learned that, from in or about December 2018 to in or about October 2019, KJ submitted approximately 191 claims for transportation services

for Medicaid Enrollee-19. For these claims, KJ was paid approximately \$19,000.

148. Based on my communication with an employee at Transportation Manager-1 and my review of an audio recording of a phone call, I have learned that, in or about November 2019, Medicaid Enrollee-19 called Transportation Manager-1 to say he no longer wanted any medical transportation to be scheduled on his account.

149. On or about November 7, 2019, another law enforcement officer and I interviewed Medicaid Enrollee-19. During that interview, I learned the following:

a. Medicaid Enrollee-19 receives certain drug treatment at clinic located at Bronx Address-2.

b. Medicaid Enrollee-19 has never taken Medicaid-funded transportation services because the drug treatment clinic he visits is near his home. Medicaid Enrollee-19 has never lived in Brooklyn.

c. Medicaid Enrollee-19 is aware of a Medicaid fraud scheme in which a woman, who he referred to as "Solaida," paid individuals to use their Medicaid information.

d. Solaida requests biographic and Medicaid information from Medicaid recipients. Solaida's representative then calls Transportation Manager-1 to schedule Medicaid transportation and submit claims for transportation not provided.

e. In exchange for allowing Solaida to use the Medicaid recipient's information, Solaida pays Medicaid recipients \$100 per week cash if there are five trips booked per week or \$120 per week cash if there are six trips booked per week.

f. When calling Transportation Manager-1, Solaida's representative changes the Medicaid recipient's home address to a distant address in Brooklyn, because the reimbursement rate is higher for a longer trip.

g. Solaida drives a black Mercedes truck or SUV, and pays Medicaid recipients on Wednesdays mornings. Solaida pays many Medicaid recipients in the area near Bronx Address-2.

h. Medicaid Enrollee-19 stated that Solaida's scheme is ongoing.

i. Medicaid Enrollee-19 provided a particular phone number as Solaida's phone number (the "Gonzalez Phone Number").

150. Based on my review of records from Facebook, Inc. ("Facebook"), I have learned the Gonzalez Phone Number is associated with an Instagram account in the name of "zoraida gonzalez." Furthermore, Facebook records indicate the Gonzalez Phone Number is "verified." Based on my training and experience, I have learned that a "verified" telephone number is one that a service provider has confirmed is active and is controlled by the user enrolling with the service provider. Facebook records state that a "verified" telephone number "indicates the account holder responded to a text sent to the listed phone number."

151. Based on my review of records from a telecommunications provider, I have learned that the "MSISDN" name associated with the phone associated with the Gonzalez Phone Number is "Zoraida Gonzalez."

152. On or about August 19, 2019, I reviewed the contents of a mobile phone belonging to JULIO ALVARADO, the defendant, (the "Alvarado Mobile Phone") while ALVARADO was entering the United States at an international airport in the New York Area. During that review, I learned, in substance and in part, the following:

a. ALVARADO had text message conversations with an individual saved in his phone as "Driver 102 Lady."

b. The contact information card for "Driver 102 Lady" listed the Gonzalez Phone Number.

153. Based on my review of bank records for accounts belonging to KJ, I have learned that many of the checks from KJ to ZORAIDA GONZALEZ, the defendant, included in the memo line references to 102, such as the note "Car 102," "#102," or "102."

B. Payments To Medicaid Enrollees

154. On or about November 10, 2019, I went to the home address in Yonkers, New York, associated with ZORAIDA GONZALEZ, the defendant; based on my review of the returns from commercial databases (the "Gonzalez Address"). There, I observed a large black Mercedes van parked in the driveway (the "Gonzalez

Mercedes") and I noted the license plate number (the "Gonzalez License Plate Number").

155. Based on my review of NYPD records, on or about November 6, 2019, ZORAIDA GONZALEZ, the defendant, received a ticket from an NYPD officer for an improper turn while in a vehicle with the Gonzalez License Plate Number.

156. On or about November 20, 2019, law enforcement officers and I conducted surveillance of the Gonzalez Mercedes. Based on my own observations and my conversations with other law enforcement officers, I have learned, in substance and in part, the following:

a. At approximately 5:08 a.m. on November 20, 2019, a female, later identified as ZORAIDA GONZALEZ, the defendant, and another individual, departed from the Gonzalez Address in the Gonzalez Mercedes.

b. Between approximately 6:00 a.m. and approximately 10:30 a.m., law enforcement officers observed GONZALEZ driving to various locations in the Bronx, New York. At least nineteen times, an individual would approach the Gonzalez Mercedes, and law enforcement officers observed a hand-to-hand transaction take place. On at least six of those occasions, law enforcement officers observed GONZALEZ handing currency to the person who approached her vehicle.

c. Law enforcement officers interviewed three individuals who had participated in hand-to-hand transactions with ZORAIDA GONZALEZ, the defendant.

d. The first individual ("Medicaid Enrollee-20") stated, in sum and substance, that his "sister" had given him \$10 because he needed money. During the hand-to-hand transaction between Medicaid Enrollee-20 and GONZALEZ, law enforcement officers observed GONZALEZ hand Medicaid Enrollee-20 currency and a piece of paper. When law enforcement officers interviewed Medicaid Enrollee-20, he had a rolled up piece of paper in his hand that, although only partially visible, was consistent with the appearance of a Form 2015.

e. The second individual ("Medicaid Enrollee-21") stated, in sum and substance, that he was paid \$300 because "she owed [him] money." During the hand-to-hand transaction between Medicaid Enrollee-21 and GONZALEZ, law enforcement officers observed GONZALEZ hand Medicaid Enrollee-21 currency and a piece of paper. When law enforcement officers interviewed

Medicaid Enrollee-21, he also had a Form 2015 in his hand.

f. The third individual interviewed ("Medicaid Enrollee-22") stated, in sum and substance, that his "Auntie," "Zoraida," gave him \$60 to help him because he did not have any money. During the hand-to-hand transaction between Medicaid Enrollee-22 and GONZALEZ, law enforcement officers observed GONZALEZ hand Medicaid Enrollee-22 currency.

157. Based on my conversations with OMIG employees and my review of records provided by OMIG, I have learned, in substance and in part, the following:

a. From in or about October 2018, to in or about October 2019, KJ submitted approximately 323 claims for transportation services related to Medicaid Enrollee-20. For these claims, KJ was paid approximately \$44,000.

b. From in or about November 2018, to in or about September 2019, KJ submitted approximately 270 claims for transportation services related to Medicaid Enrollee-21. For these claims, KJ was paid approximately \$28,000.

c. From in or about July 2019, to in or about September 2019, KJ submitted approximately 46 claims for transportation related to Medicaid Enrollee-22. For these claims, KJ was paid approximately \$4,000.

C. Medicaid Enrollee-23

158. Based on my conversations with a particular Medicaid enrollee ("Medicaid Enrollee-23"), I have learned, in substance and in part, the following:

a. In or about December 2018, Medicaid Enrollee-23 learned that he could receive money in exchange for his Medicaid information. To do so, he was directed to visit an individual, believed to be NELSON DIAZ, a/k/a "Abdul Alamin," the defendant, at a particular location in the Bronx ("Bronx Location-3").¹²

¹² Medicaid Enrollee-23 does not know the name of this individual. However, for several reasons, I believe the individual he met is NELSON DIAZ, a/k/a "Abdul Alamin," the defendant. First, as set forth below, DIAZ placed calls to Transportation Manager-1 purporting to be Medicaid Enrollee-23. Second, Medicaid Enrollee-23 described the person he met as

b. In or about December 2018, Medicaid Enrollee-23 went to Bronx Location-3 and met DIAZ. There, he gave DIAZ his Medicaid information and DIAZ placed a call in order to schedule the transportation.¹³ Medicaid Enrollee-23 met with DIAZ on at least one other occasion.

c. After Medicaid Enrollee-23's meeting with DIAZ, ZORAIDA GONALEZ, the defendant, paid Medicaid Enrollee-23 on several occasions. GONZALEZ contacted Medicaid Enrollee-23 via phone call and text message using the Gonzalez Phone Number.

d. GONZALEZ paid Medicaid Enrollee-23 approximately each week on Wednesday morning. Medicaid Enrollee-23 described GONZALEZ's vehicle as a Mercedes.

e. Medicaid Enrollee-23's wife, who was present on one occasion when I interviewed Medicaid Enrollee-23, described GONZALEZ's vehicle as a black minivan.¹⁴

f. Soon after Medicaid Enrollee-23's first meeting with DIAZ, GONZALEZ told Medicaid Enrollee-23 that he needed to complete a Form 2015. Medicaid Enrollee-23 told GONZALEZ that he could not get a Form 2015.

g. Medicaid Enrollee-23 has never taken

having darker skin, glasses, and a beard, and wearing a certain kind of headdress. As described elsewhere in this Complaint, based on the Facebook records, Instagram Records, and subscriber information described below, I have identified DIAZ and believe he meets the description provided by Medicaid Enrollee-23. Third, the location where Medicaid Enrollee-23 met DIAZ was adjacent to DIAZ's apartment building, based on my conversations with Medicaid Enrollee-23 and my review of DIAZ's lease, provided by his apartment building. Finally, as set forth elsewhere in this Complaint, one of the phone numbers DIAZ used to call Transportation Manager-1 was registered to ZORAIDA GONZALEZ, the defendant.

¹³ As set forth below, Transportation Manager-1 records show that NELSON DIAZ, a/k/a "Abdul Alamin," the defendant, placed a call to Transportation Manager-1 purporting to be Hernandez and seeking to schedule a standing order for transportation rides.

¹⁴ As noted above, law enforcement officers observed ZORAIDA GONZALEZ, the defendant, making payments to Medicaid enrollees while driving in the Gonzalez Mercedes, a large black Mercedes van.

Medicaid-funded transportation with KJ.

159. Based on my review of records provided by a telecommunications provider, I have learned that there were approximately 148 phone calls or text messages ("Phone Contacts") between the Gonzalez Phone Number and a particular phone number associated with Medicaid Enrollee-23.

160. In or about January 2020, Medicaid Enrollee-23 was shown a set of images depicting several different individuals and identified the photograph that I believe depicts ZORAIDA GONZALEZ, the defendant, based on law enforcement records, as the person who paid him money in exchange for his Medicaid information.

161. Based on my review of records provided by OMIG, I have learned that, from in or about November 2018 to in or about December 2019, KJ submitted approximately 330 claims for transportation services for Medicaid Enrollee-23. For these claims, KJ was paid approximately \$33,000.

162. As set forth above, contrary to KJ's approximately 330 claims for transportation services for Medicaid Enrollee-23, Medicaid Enrollee-23 has never taken Medicaid-funded transportation with KJ.

163. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant attested to nearly all of KJ's claims for transporting Medicaid Enrollee-23.

D. Calls to Transportation Manager-1

164. Based on my review of records from Transportation Manager-1, I have learned that, between in or about July 2018 and in or about May 2019, there were approximately 40 calls from the Gonzalez Phone Number to Transportation Manager-1. On many of these calls, the caller identifies herself as "Zoraida Gonzalez" and attempts to book orders on behalf of others.

E. Payments from KJ

165. Based on my review of bank records, I have learned that from in or about July 2018 to in or about December 2019, ZORAIDA GONZALEZ, the defendant, received approximately 86 checks from bank accounts belonging to KJ totaling approximately \$523,000. The checks were all signed by JORGELINA ABREU GIL, the defendant, or JULIO ALVARADO, the defendant.

NELSON DIAZ, a/k/a "Abdul Alamin"

166. On or about November 7, 2019, another law enforcement officer and I interviewed Medicaid Enrollee-19. During that interview, I learned the following:

- a. ZORAIDA GONZALEZ, the defendant, had an associate who helped her with her Medicaid scheme.
- b. Medicaid Enrollee-19 displayed the Facebook page of this associate (the "Alamin Facebook Page"). The Facebook page showed the display name "Abdul Alamin" and a particular date of birth that matches the date of birth of NELSON DIAZ, a/k/a "Abdul Alamin", the defendant.
- c. The Alamin Facebook Page contains a "profile picture," which, based on my training and experience, is often a photograph of the individual who operates the page. Here, the profile picture for the Alamin Facebook Page showed an adult male who matches the description of DIAZ based on my review of photographs is a law enforcement database.

167. Based on my review of Facebook records, I have learned that there is a particular phone number listed by the owner of the Alamin Facebook Page ("Alamin Phone Number-1"). This phone number was "verified" on or about August 9, 2019. Furthermore, the email address associated with the Alamin Facebook Page references the name "Abdul Qudduss," which I believe to be an alias for NELSON DIAZ, a/k/a "Abdul Alamin, the defendant, based on my review of law enforcement records.

A. Calls to Transportation Manager-1

168. Based on my review of records from Transportation Manager-1, I have learned that, from in or about February 2019 to in or about October 2019, there were approximately 821 calls between Transportation Manager-1 and Alamin Phone Number-1. My review of the calls shows that, on several occasions, NELSON DIAZ, a/k/a "Abdul Alamin," the defendant, attempts to place several fraudulent orders. For example:

- a. On or about February 26, 2019, DIAZ, with a male-sounding voice, claims to be a particular female Medicaid enrollee ("Medicaid Enrollee-24") in order to schedule Medicaid transportation. When DIAZ is told that he has not obtained a Form 2015, he disputes the operator's account.

- b. Approximately 9 minutes after placing the

call impersonating Medicaid Enrollee-24, DIAZ calls Transportation Manager-1 and claims to be another female Medicaid Enrollee ("Medicaid Enrollee-25"). Again, Diaz is told that he has not filed a Form 2015, so he is not eligible for medical transportation through Medicaid. He disputes this account.

c. Approximately 7 minutes after placing the call impersonating Medicaid Enrollee-25, DIAZ calls back to Transportation Manager-1, again claiming to be Medicaid Enrollee-24. When he is told he does not have a Form 2015 on file, he disputes the account and says, among other things, he has submitted it five times.

d. On the same day, DIAZ called Transportation Manager-1 at least five additional times, each time claiming to be a different male Medicaid enrollee.

169. In or about December 2019, I met with an individual in the Bronx, New York ("Individual-2") who was familiar with NELSON DIAZ, a/k/a "Abdul Alamin," the defendant. I played for Individual-2 certain audio calls between Transportation Manager-1 and Alamin Phone Number-1. Individual-2 confirmed that the voice of the caller from Alamin Phone Number-1 was DIAZ.

170. Based on my review of publicly available records, I have learned that there is an Instagram account for an individual named "Abdul AL-Amin" (the "Alamin Instagram Page"). The profile picture on the Alamin Instagram Page depicts the same individual shown in the profile picture of the Alamin Facebook Page, *i.e.*, NELSON DIAZ, a/k/a "Abdul Alamin," the defendant.

171. Based on my review of records provided by Facebook, which owns Instagram, I have learned that there is a particular phone number listed by the owner of the Alamin Instagram Page ("Alamin Phone Number-2"). This phone number has been verified by Facebook.

172. Based on my review of records from Transportation Manager-1, I have learned, in substance and in part, the following:

a. From in or about September 2018, to in or about March 2019, there were 383 calls between Transportation Manager-1 and Alamin Phone Number-2.

b. On or about September 7, 2018, NELSON DIAZ, a/k/a "Abdul Alamin", the defendant, called Transportation Manager-1 claiming to be a particular Medicaid enrollee ("Medicaid Enrollee-26"). On the call, DIAZ stated that he wanted to create a standing order for travel Monday through Saturday. DIAZ specifically requested travel with KJ. The operator asked whether he wants his standing order to go until December 31 or "further," to which DIAZ quickly responded that he wanted the standing order to go further. The operator entered the standing order to go into mid-2019.

c. Approximately an hour after placing the call impersonating Medicaid Enrollee-26, DIAZ called Transportation Manager-1 again from Alamin Phone Number-2. This time, DIAZ claimed to be a particular Medicaid enrollee ("Medicaid Enrollee-27"). Because Transportation Manager-1 did not have a Form 2015 on file for Medicaid Enrollee-27, the operator only agreed to enter standing order until the end of the month.

d. On or about November 30, 2018, DIAZ called Transportation Manager-1 claiming to be Medicaid Enrollee-19. DIAZ requested a standing order for transportation Monday-Friday. The operator initially suggested setting a standing order for one month, but DIAZ balked at that suggested and requested a standing order for one year. He requested that his standing order begin as soon as possible, rather than giving a specific day his treatment would begin. DIAZ requested travel through KJ.

e. In or about October 2018, December 2018, January 2019, and March 2019, DIAZ called Transportation Manager-1 claiming to be Medicaid Enrollee-23. On the calls, DIAZ sought to change Medicaid Enrollee-23's listed address in the Transportation Manager-1 system, and schedule standing order trips. As set forth above, Medicaid Enrollee-23 never took any Medicaid-funded trips with KJ and was paid by ZORAIDA GONALEZ, the defendant, in exchange for his Medicaid information.

f. On or about February 6, 2019, and on or about March 4, 2019, Transportation Manager-1 employees called Alamin Phone Number-2. The calls went to voicemail. On the voicemail recording, which was similar for each call, the user of Alamin Phone Number-2 identifies himself as "Abdul Qudduss," *i.e.*, the same name referenced in the email address for the Alamin Facebook Page.

173. Based on my review of records from a telecommunications provider, I have learned that, from on or

about August 27, 2018, to on or about April 27, 2019, the subscriber associated with Alamin Phone Number-2 was "ZORAIDA GONZALEZ." As set forth above, this is approximately the same time period when NELSON DIAZ, a/k/a "Abdul Alamin," the defendant, was placing calls to Transportation Manager-1 using Alamin Phone Number-2.

174. Based on my review of records provided by OMIG, I have learned that, from in or about July 2018 to in or about November 2018, KJ submitted approximately 111 claims related to transportation for Medicaid Enrollee-26. For those claims, KJ was paid approximately \$11,000.

175. Based on my review of records provided by OMIG, I have learned that, from in or about September 2018 to in or about November 2019, KJ submitted approximately 184 claims related to transportation for Medicaid Enrollee-27. For those claims, KJ was paid approximately \$24,000.

176. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant attested to each of KJ's claims for transporting Medicaid Enrollee-26 and Medicaid Enrollee-27.

JORGELINA ABREU GIL and JULIO ALVARADO

177. Based on my investigation and as set forth below, JORGELINA ABREU GIL and JULIO ALVARADO, the defendants, have been actively involved in orchestrating and furthering the scheme to submit thousands of fraudulent claims to Medicaid.

A. Facilitating Day-to-Day Activities

178. Based on my investigation, I have learned that two email accounts are principally associated with KJ.

179. Based on my review of records provided by an email provider, I have learned, in substance and in part, the following:

a. KJ Email Account-1 was created on or about September 6, 2013. The user-provided subscriber name for KJ Email Account-1 is "KJ Transportation Kings & Gunhill." The recovery email for KJ Email Account-1 is a particular email address that references the name of JORGELINA ABREU GIL, the defendant ("Abreu Gil Email Account-1"). The telephone number for KJ Email Account-1 is a particular phone number associated with ABREU GIL, as set forth below (the "Abreu Gil Phone

Number").

b. KJ Email Account-2 was created on or about September 10, 2018. The user-provided subscriber name for KJ Email Account-2 is "jorjelina abreu." Like with KJ Email Account-1, the recovery email for KJ Email Account-2 is Abreu Gil Email Account-1 and the telephone number provided for KJ Email Account-2 is the Abreu Gil Phone Number.

180. As set forth below, based on my review of emails in KJ Email Account-1 and KJ Email Account-2, produced pursuant to a judicially authorized search warrant, my conversations with other law enforcement officers who have reviewed those records, and my conversations with an individual associated with Billing Provider-1 ("Individual-3"), I have learned that KJ Email Account-1 was operated by JULIO ALVARADO and JORGELINA ABREU GIL, the defendants, and others associated with KJ. Meanwhile, KJ Email Account-2 was generally operated by only JULIO ALVARADO and JORGELINA ABREU GIL, the defendants.

181. Based on my review of email correspondence between KJ Email Account-1 and Billing Provider-1, I have learned, in substance and in part, the following:

a. On or about October 12, 2017, Individual-3 wrote to KJ Email Account-1. The email had the subject "medicaid payments" and the body of the message had a screenshot showing a table of Medicaid payments to KJ on certain dates in September and October 2017. On or about October 13, 2017, an individual responded from KJ Email Account-1 to provide The Abreu Gil Phone Number. The individual closed the email with "JORGELINA FROM KJ."

b. On or about May 21, 2018, an individual wrote to Individual-3 from KJ Email Account-1 to provide an updated address form for eMedNY, New York State's online website for submitting certain health-related claims. The form, submitted on behalf of "KJ Transportation C Service Inc," was signed by "Jorgelina Abreu" and dated May 21, 2018.

c. On or about July 3, 2018, an individual wrote to Individual-3 from KJ Email Account-1 to say "Same problem I can't attest those trips." The email message also included a screenshot of what appears to be the Transportation Manager-1 online portal for managing transportation claims. Based on my review of the screenshot, it appears that the user logged in to the Transportation Manager-1 system was "Jorgelina Abreu."

d. On or about August 14, 2018, Individual-3 wrote to KJ Email Account-1 to provide information about Billing Provider-1's "Dispatch Base and Driver App." The email from Individual-3 is addressed to "Julio." On or about August 16, 2018, an individual wrote back to Individual-3 from KJ Email Account-1 and the email was signed "Julio."

e. On or about October 12, 2018, Individual-3 emailed KJ Email Account-1 and KJ Email Account-2 to note that a certain driver is listed as inactive on Transportation Manager-1 but KJ is still listing him as the driver and then attesting to those rides.

f. On or about February 28, 2019, an individual wrote to Individual-3 from KJ Email Account-1 to say "Hi im jorgelina from KJ i need a favor ir you cant please send to me all the Payments that a make to you please Thanks."

182. Based on my review of email correspondence between KJ Email Account-1 and Transportation Manager-1, I have learned, in substance and in part, the following:

a. On or about August 24, 2017, an individual wrote to Transportation Manager-1 from KJ Email Account-1 to provide a "Transportation Provider Information" form, dated July 25, 2017. The form lists, among other things, the following information:

i. The "Company Name" is "KJ TRANSPORTATION C SERVICES INC."

ii. The "Primary Contact Name" is JORGELINA ABREU GIL, the defendant.

iii. The phone number listed for KJ is a particular phone number that is also prominently displayed outside KJ's physical office space in the Bronx, New York.

iv. The "User Supervisors" are "JULIO ALBARADO" and another individual affiliated with KJ.

v. The "Dispatch Email" is KJ Email Account-1.

vi. The Transportation Provider Information form is dated July 25, 2017, and is signed by ABREU GIL.

b. On or about August 24, 2017, an individual

wrote to Transportation Manager-1 from KJ Email Account-1 to provide an updated Transportation Provider Information form, dated August 24, 2017. That form contains much of the same information as the version dated July 25, 2017. However, among other changes, the updated form lists The Abreu Gil Phone Number as the alternate phone number for KJ. The updated form is also signed by ABREU GIL.

c. On August 29, 2017, ABREU GIL wrote to Individual-1 from KJ Email Account-1 to say that, although the company previously only did trips in the Bronx and Manhattan, it could now do "vouchers," i.e., Medicaid-funded trips, in Queens and Brooklyn. The email message was signed "JORGELINA ABREU KJTRANSPORTATION."

183. Based on my review of email correspondence between KJ Email Account-1 and Dispatch Service-1, I have learned that, on or about July 23, 2018, a user wrote from KJ Email Account-1 to say "THIS MESSAGE IS TO INFORM YOU THAT JULIO/JORGELINA DID NOT GIVE ANYONE ACCESS TO KJS LIMOSYS ACCOUNT - WE WERE ON VACATION IN RECENT DAYS AND IT SEEMS THAT SOMEONE CAN VIEW OR CALLS - I WILL BE CHANGING TEAM VIEWER FROM ALL SYSTEMS AND CALLING YOU DIRECTLY TO SHARE IT."

184. Based on my review of email correspondence and my conversations with Individual-3, I have learned that KJ Email Account-2 was created to give JORGELINA ABREU GIL and JULIO ALVARADO, the defendants, a separate email account that was not accessible by others who worked at KJ.

185. Based on my review of email correspondence between KJ Email Account-2 and Billing Provider-1, I have learned, in substance and in part, the following:

a. On or about September 10, 2018, ABREU GIL wrote to Individual-3 from KJ Email Account-2 to say "im jorgelina from kj if it is to inform you that this is a new email that I have created to receive notices from you if you can please send me all the necessary information to this email and the other will use it for issues of tlc only not billing. please use this email for our business. Any question you can call me thanks. jorgelina."

b. On or about July 24, 2019, Individual-3 wrote to KJ Email Account-2 to inquire about "over 600 unattested trips." On or about the same day, an individual responded from KJ Email Account-2 to say "Hi thanks I'm going star doing tomorrow."

186. Based on my review of email correspondence from KJ Email Account-1 and KJ Email Account-2, I have learned, in substance and in part, that, on several occasions in 2018 and 2019, individuals sent email messages from the two KJ email accounts to Billing Provider-1 showing wire transfer receipts. The receipts showed payments from KJ to Billing Provider-1 and listed JORGELINA ABREU GIL, the defendant, as the person who originated the wire transfer.

187. Other records shows that JULIO ALVARADO and JORGELINA ABREU GIL, the defendants, were involved in day-to-day activities of KJ. For example, on or about February 23, 2018, JORGELINA ABREU GIL, the defendant, sent an email from KJ Email Account-1 to an individual at the New York State Worker's Compensation Board inquiring about the company's worker's compensation policy. The email is signed "thank again Jorgelina abreu KJ transportation."

B. Operating KJ with Co-Conspirators

188. Based on my review of text message communications between JORGELINA ABREU GIL, the defendant, and JULIO ALVARADO, the defendant, I have learned that both defendants communicated with one another regarding the operations of KJ, including dispatching functions. For example:

a. On or about December 10, 2018, ABREU GIL sent ALVARADO a screenshot showing a page from Billing Provider-1's platform. The screenshot appears to show that two potential customers are not eligible for Medicaid-funded transportation. ABREU GIL sent similar screenshots to ALVARADO on January 7, 2019, and February 11, 2019.

b. On or about December 12, 2018, ALVARADO sent ABREU GIL a screenshot showing a page from KJ's Dispatch System. The trip shown in the screenshot is assigned to "37," i.e., the Driver Number associated with CRISTOPHER SANTOS FELIX, VICTORIA PALMA BREA, and JOHN MANUEL MEJIA, the defendants.

c. On or about December 30, 2018, ALVARADO sent ABREU GIL a picture showing a table with seven columns, apparently representing each day between December 24 and December 30. Within each column was a list of dollar values ranging from \$15 to \$360. There is a total provided for each column, and an overall total stated as \$2130. The table then shows a subtraction of 20% and a total of \$1704. At the top of the page is the number 523, i.e., Co-Conspirator-2's Driver Number. Based on my review of records from Payment Service-1, I

have learned that, on the same day ALVARADO sent ABREU GIL this table, ABREU GIL sent \$1,704.00 to Co-Conspirator-2 using Payment Service-1.

d. On or about January 15, 2019, ALVARADO sent ABREU GIL a picture of a list of five individuals, along with Medicaid numbers, phone numbers, and addresses. As set forth below, two days later, ABREU GIL forwarded the list to Co-Conspirator-2.

189. Based on my review of text message communications between JORGELINA ABREU GIL, the defendant, and others associated with KJ, I have learned that ABREU GIL regularly communicated with others about KJ's day-to-day operations. For example:

a. On or about December 5, 2018, Co-Conspirator-2 sent a screenshot showing a page from KJ's Dispatch System and asking ABREU GIL to order a car for that trip using a publicly available ride-sharing service ("Ride-Sharing Service-1"). Approximately five minutes later, ABREU GIL sent back a screenshot showing that she had ordered the trip using Ride-Sharing Service-1.

b. On or about January 17, 2019, ABREU GIL sent Co-Conspirator-2 a picture of a phone screen showing the names of five individuals, Medicaid ID numbers, phone numbers, and addresses. As set forth above, JULIO ALVARADO, the defendant, sent this list to ABREU GIL two days earlier.

c. On or about January 25, 2019, Co-Conspirator-2 wrote to ABREU GIL to say "25 and 11 is here for payments but you didn't leave me instructions for them." As set forth above, Driver Numbers 11 and 25 are both associated with JOHN MANUEL MEJIA, the defendant.

d. On or about April 12, 2019, Co-Conspirator-2 wrote to ABREU GIL to say "Hey this weekend im going to grab random numbers to audit the trips - January to April 13 2019 to see whats cancelled from [Transportation Manager-1] to see who owns you money. Is this okay with you?" ABREU GIL responded "Yes."¹⁵

¹⁵ Based on my investigation, including conversations with Transportation Manager-1 and OMIG employees, I have learned that in some instances Transportation Manager-1 or the New York State Department of Health will deny or otherwise not pay a claim that

190. Based on my review of text message communication between JORGELINA ABREU GIL, the defendant, and Co-Conspirator-1, I have learned that, on or about April 12, 2019, Co-Conspirator-1 sent ABREU GIL a picture of a note card listing various items and dollar amounts. Among others, the note gave the following items and a corresponding dollar amount: "2123" and \$1,600.00; "2124" and \$2,124.00; "2125" and \$956.00; "2127" and \$679.00"; "Rent 4/11/19" and \$2,150.00; "Mortgage" and \$3,800.00; and "#30" and \$150.00.

191. Based on my review of bank records for accounts belonging to KJ, I have learned that, between April 12, 2019, and April 23, 2019, JORGELINA ABREU GIL, the defendant, drafted and signed checks corresponding to each of the payments listed in the note from Co-Conspirator-1.¹⁶ In particular, her checks associated with driver numbers listed "2123," "2124," "2125," and "2127" in the memo line of the check.

C. Co-Conspirator-7's Fraudulent Driver Cards

192. As set forth above, based on my conversation with a Transportation Manager-1 employees and my review of publicly available Transportation Manager-1 information, I have learned that Transportation Manager-1 requires that a transportation provider state the driver who performed each trip and the vehicle he or she used. For each driver, the transportation provider must provide a driver's license number and expiration date. For each vehicle, the transportation provider must list the license plate number and the date the car's registration expires. The driver and vehicle must be selected on the attestation page for each leg of each trip claimed.

193. Based on my review of the text message communications on a phone operated by HECTOR SALAZAR HERRERA, the defendant, a backup of which was produced pursuant to a search warrant, I have learned, in substance and in part, the

is submitted by KJ. Accordingly, to the extent JORGELINA ABREU GIL, the defendant, paid co-conspirators based on the Medicaid claims submitted to Transportation Manager-1 and the DOH but some of those claims were denied or not paid, ABREU GIL might be "owed" money from those co-conspirators.

¹⁶ In her note, Co-Conspirator-1 listed the value \$2,124 for the driver number "2124." That may have been written in error because ultimately the check written on or about April 12, 2019, with "#2124" in the memo line was written for \$1,414.00.

following:

a. On or about November 3, 2018, JULIO AVARADO, the defendant, messaged SALAZAR HERRERA to ask if SALAZAR HERRERA had contacted a particular individual ("Co-Conspirator-7"), who ALVARADO referenced by a first name similar to Co-Conspirator-7's first name. SALAZAR HERRERA responded that, in sum and substance, he was waiting for Co-Conspirator-7 to get the drivers information and insurance information.

b. On or about November 3, 2018, SALAZAR HERRERA messaged Co-Conspirator-7 asking if she could send him certain documents by email before she came to the base. SALAZAR HERRERA also provided the address of KJ's office in the Bronx and an email address. Co-Conspirator-7 subsequently wrote that she was on her way.

c. Later that day, SALAZAR HERRERA sent images of eight driver's license cards and informed Co-Conspirator-7 that they were "expired." In response, Co-Conspirator-7 expressed frustration and indicated she would send others.

d. Several days later, on or about November 8, 2018, SALAZAR HERRERA messaged Co-Conspirator-7 to say that some of the licenses she recently sent were repeats of ones she had sent before. Co-Conspirator-7 responded that if he sent her the repeats, she would send him more.

e. On or about November 30, 2018, SALAZAR HERRERA again asked Co-Conspirator-7 for more drivers. SALAZAR HERRERA also referenced the need to charge more "vouchers," i.e., Medicaid-funded trips.

f. On or about December 3, 2018, ALVARADO again asked SALAZAR HERRERA about Co-Conspirator-7. SALAZAR HERRERA responded that he was "waiting for her to get all the drivers information and insurances together." He added that if Co-Conspirator-7 "gives me the paperwork, I will also bring them with me."

g. On or about December 3, 2018, and December 4, 2018, SALAZAR HERRERA again asked Co-Conspirator-7 for more drivers. On December 4, 2018, Co-Conspirator-7 indicated that she could provide more drivers but she did not have more cars. SALAZAR HERRERA stated that he would take the licenses then and asked how much he should pay for them.

h. Throughout December 2018, SALAZAR HERRERA

continued to ask Co-Conspirator-7 for drivers and licenses. In one message, SALAZAR HERRERA tells Co-Conspirator-7 that he could pay her \$4,000 if she got him at least 100 licenses and 100 drivers. He later told her that he had licenses but needed car papers. In another exchange, Co-Conspirator-7 told SALAZAR HERRERA that he had information for vehicles but the registrations are not active. SALAZAR HERRERA indicated that the registrations might still work for his purposes so she should pass them along.

194. Based on my review of records from Check-Cashing Company-1, I have learned that, on or about November 3, 2018, Co-Conspirator-7 deposited a check from KJ worth \$700. As set forth above, November 3, 2018, is also the date when JULIO ALVARADO, the defendant, asked HECTOR SALAZAR HERRERA, the defendant, about Co-Conspirator-7, and the date when Co-Conspirator-7 and SALAZAR HERRERA communicated about driver information. The check to Co-Conspirator-7 was signed by ALVARADO and is dated November 3, 2018.

195. Based on my review of records from Payment Service-1, I have learned that, on or about December 20, 2018, HECTOR SALAZAR HERRERA, the defendant, twice attempted to send \$400 to a user identified by the first name of Co-Conspirator-7. However, the transfers were unsuccessful.

196. As set forth above, on or about November 3, 2018, SALAZAR HERRERA responded to Co-Conspirator-7 to let her know some of the driver's licenses she sent were expired. With that message, he sent pictures showing eight driver's licenses. The licenses show information for, among others, three particular drivers ("Driver-1," "Driver-2," and "Driver-3").

197. Based on my review of records from Transportation Manager-1, I have learned, in substance and in part, the following:

a. On or about November 5, 2018, two days after SALAZAR HERRERA responded to Co-Conspirator-7 with pictures of driver's licenses, all eight drivers depicted were added to KJ's Transportation Manager-1 profile as drivers capable of completing rides. The drivers were added by JORGELINA ABREU GIL, the defendant.

b. On or about November 5, 2018, KJ began listing Driver-1 when it attested to Medicaid-funded trips, including some that purportedly happened as early as October 15, 2018. From on or about November 5, 2018, to on or about

September 12, 2019, KJ listed Driver-1 as the driver for approximately 722 trips.¹⁷ ABREU GIL attested to 718 of these trips. Based on my review of records provided by OMIG, I have learned that, for claims related to these trips, KJ was paid approximately \$50,000.

c. KJ listed Driver-1 as the driver for trips involving, among others, Medicaid Enrollee-5, Medicaid Enrollee-11, Medicaid Enrollee-15, Medicaid Enrollee-16, Medicaid Enrollee-18, Medicaid Enrollee-23, Medicaid Enrollee-24, Medicaid and two other particular Medicaid enrollees whose claims I believe to be fraudulent, based on my investigation ("Medicaid Enrollee-28" and "Medicaid Enrollee-29").¹⁸

d. On or about November 5, 2018, KJ began listing Driver-2 when it attested to Medicaid-funded trips, including some that purportedly happened as early as October 15, 2018. From on or about November 5, 2018, to on or about December 11, 2019, KJ listed Driver-2 as the driver for approximately 1,027 trips. ABREU GIL attested to 1,023 of these trips. Based on my review of records provided by OMIG, I have learned that, for claims related to these trips, KJ was paid approximately \$53,000.

e. KJ listed Driver-2 as the driver for trips involving, among others, Medicaid Enrollee-2, Medicaid Enrollee-5, Medicaid Enrollee-16, Medicaid Enrollee-21, Medicaid Enrollee-23, Medicaid Enrollee-27, Medicaid Enrollee-28, and

¹⁷ As noted above, each "claim" submitted by KJ to Medicaid could involve two "trips," e.g., travel from a customer's home to their medical appointment, and then travel from their medical appointment back to their home. However, KJ must attest to each trip and identify the driver and vehicle associated with each trip. Accordingly, here I have identified the total number of times a driver is listed as completing a particular trip.

¹⁸ Based on my interview with family members of Medicaid Enrollee-28 and my review of law enforcement records, I have learned that Medicaid Enrollee-28 left the United States in or about December 2015 and did not return, and that Medicaid Enrollee-28 died in or about September 2018, prior to the date when KJ submitted claims regarding transportation for Medicaid Enrollee-28 involving Driver-2. Based on my interview with Medicaid Enrollee-29, I have learned that he never took Medicaid-funded transportation and, prior to my interview with him in or about August 2019, had never heard of KJ.

Medicaid Enrollee-29.

f. On or about November 5, 2018, KJ began listing Driver-3 when it attested to Medicaid-funded trips, including some that purportedly happened as early as October 16, 2018. From on or about November 5, 2018, to on or about September 11, 2019, KJ listed Driver-3 as the driver for approximately 716 trips. ABREU GIL attested to all of these trips. Based on my review of records provided by OMIG, I have learned that, for claims related to these trips, KJ was paid approximately \$48,000.

g. KJ listed Driver-3 as the driver for trips involving, among others, Medicaid Enrollee-9, Medicaid Enrollee-11, Medicaid Enrollee-15, Medicaid Enrollee-23, Medicaid Enrollee-24, and Medicaid Enrollee-27.

198. Based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested to nearly all of KJ's claims that listed Driver-1, Driver-2, or Driver-3.

199. In or about January 2020, other law enforcement officers and I interviewed Driver-1, Driver-2, and Driver-3. Based on the interviews I conducted and my conversations with other law enforcement officers, I have learned that none of those drivers performed rides for KJ. During the relevant period, Driver-1 only did Medicaid-funded trips for a transportation company other than KJ. Driver-2 had never heard of Medicaid vouchers. Driver-3 had never driven for a Medicaid voucher. Accordingly, contrary to KJ's claims and JORGELINA ABREU GIL's, the defendant's, attestation, these drivers did not perform the thousands of trips attributed to them by KJ in its Medicaid claims.

D. Driver Data in Dispatch Service-1

200. As set forth above, KJ uses Dispatch Service-1. Among other things, Dispatch Service-1 pairs trips with individual drivers. Accordingly, through Dispatch Service-1, KJ can assign a particular driver to handle a particular Medicaid enrollee's trip.

201. As set forth above, on or about April 19, 2019, another law enforcement officer and I interviewed JULIO ALVARADO, the defendant. During that interview, ALVARADO stated that financial records and records relating to his business operation were held by Dispatch Service-1.

202. Based on my review of text message communication between JULIO ALVARADO, the defendant, and JORGELINA ABREU GIL and HECTOR SALAZAR HERRERA, the defendants, email communications to and from the KJ email accounts, my review of certain records provided by Transportation Manager-1, and my communications with law enforcement officers who had conversations with Individual-3, among other things, I have learned that ALVARADO is closely involved in the day-to-day operations of KJ. Those operations including dispatching drivers and paying KJ employees, including drivers.

203. As set forth above, KJ submitted thousands of claims for transportation that it did not, in fact, provide. Individuals at KJ, typically JORGELINA ABREU GIL, attested to those trips on the Transportation Manager-1 website. However, based on my review of records provided by Dispatch Service-1, I have learned, in substance and in part, that many of those fraudulent trips are also reflected in Dispatch Service-1. For example:

a. Records from Dispatch Service-1 show that Driver Number 37 - a Driver Number associated with CRISTOPHER SANTOS FELIX, the defendant - conducted 262 trips for Medicaid Enrollee-17 and 216 trips for Medicaid Enrollee-18.

b. As set forth above, neither Medicaid Enrollee-17 nor Medicaid Enrollee-18 ever took any trips with KJ.

c. Records from Dispatch Service-1 identify various individuals associated with KJ as the dispatcher for various trips, including JULIO ALVARADO, the defendant, and Co-Conspirator-2.

d. ALVARADO is listed as the dispatcher for approximately 122 total trips for Medicaid Enrollee-17 and Medicaid Enrollee-18 in which he assigned the enrollee to Driver 37.

204. Although Dispatch Service-1 records show a large number of trips with one driver, records of claims submitted to Transportation Manager-1 do not match this. Rather, based on my review of records provided by Transportation Manager-1, I have learned that JORGELINA ABREU GIL, the defendant, attested that more than 78 different drivers conducted trips for Medicaid Enrollee-17 and Medicaid Enrollee-18.

E. Attesting to Fraudulent Claims

205. As set forth above, JORGELINA ABREU GIL, the defendant, attested to thousands of fraudulent claims submitted by KJ.

206. Based on my review of the internet search history of a phone operated by JORGELINA ABREU GIL, a backup of which was produced pursuant to a search warrant, I have learned, on several occasions between at least in or about February 2019 and in or about September 2019, ABREU GIL visited and logged into the Transportation Manager-1 website. Records show that ABREU GIL visited the URL for the attestation page on several occasions. In addition, the Transportation Manager-1 website is saved as a "bookmark" in her mobile phone web browser, giving her quicker access to that page. Based on my conversations with Transportation Manager-1 employees and my review of Transportation Manager-1 records, I have learned that the website for Transportation Manager-1 can be used to view trip volume and activity, and attest to specific trips, among other things.

207. Based on my review of text communications between JORGELINA ABREU GIL, the defendant, and a particular individual associated with KJ ("Co-Conspirator-8"), I have learned that, in substance and in part, on or about March 7, 2019, ABREU GIL sent a message to Co-Conspirator-8 saying that she was doing the attestations and including a photograph of one of the attestation pages on the Transportation Manager-1 website.

208. Based on my training and experience, and my review of publicly available information, I have learned that a particular technology company ("Company-1") sells a popular mobile phone and, in addition, a service that allows users to save documents and images to a cloud-based backup system (the "Company-1 Cloud").

209. Based on my review of records provided by Company-1 pursuant to a judicially authorized search warrant, I have learned, in substance and in part, the following:

a. The user of the account associated with Abreu Gil Email Account-1, who I believe to be JORGELINA ABREU GIL, the defendant, stored certain photographs and documents on the Company-1 Cloud.

b. Among the photographs ABREU GIL saved to the Company-1 Cloud is a photograph showing a computer on the

attestation page of the Transportation Manager-1 website ("Diaz Attestation Page Photograph"). The particular trip shown on the attestation page in the photograph is a March 21, 2019, trip for Medicaid Enrollee-16. As set forth above, KJ submitted approximately 171 claims for transportation for Medicaid Enrollee-16, far in excess of the number of trips taken by Medicaid Enrollee-16. JOSE JIMENEZ HIDALGO, the defendant, paid Medicaid Enrollee-15 in exchange for Medicaid Enrollee-16's Medicaid information.

c. The attestation page contains the false statement notice quoted above that states, among other things, "PLEASE TAKE NOTICE: FILING FALSE STATEMENTS IS A CRIME."

d. Metadata for the photograph shows that it was taken on March 26, 2019, using the same camera that ABREU GIL used to take other photographs around the same time, based on my review of records provided by Company-1. In addition, the photograph shows the Transportation Manager-1 website accessed using a laptop similar to one regularly depicted in ABREU GIL's photographs.

210. Based on my review of records provided Transportation Manager-1, I have learned, in substance and in part, that JORGELINA ABREU GIL, the defendant, attested to the trip shown in the Diaz Attestation Page Photograph on March 26, 2019, *i.e.*, the same day the photograph was taken.

F. Withdrawing Cash and Transferring Funds

211. In or about April 2019, another law enforcement officer and I interviewed JULIO ALVARADO, the defendant. During the interview, ALVARADO stated that only he and his wife, JORGELINA ABREU GIL, the defendant, have access to the business checkbook.

212. Based on my review of bank records for accounts held in the name of KJ (the "KJ Accounts"), I have learned, in substance and in part, the following:

a. Since KJ began submitting transportation claims in or about August 2017, there have been a significant number of cash withdrawals from the KJ Accounts. In addition, during the same time period, there have been dozens of transfers, via check, electronic transfer, or wire transfer, from the KJ Accounts to accounts held in the name of JORGELINA ABREU GIL, the defendant.

b. In four instances from in or about June 2018 to in or about February 2019, JULIO ALVARADO, the defendant, transferred money from an account held in the name of KJ to an account held in his own name. For example, on about June 20, 2018, ALVARADO transferred \$20,000 from an account held in the name of KJ at Bank-2 to an account held in his own name at Bank-2.

213. Based on my review of bank records, including surveillance videos, I have learned, in substance and in part, that, on several occasions in late-2019, JORGELINA ABREU GIL and JULIO ALVARADO, the defendants, withdrew large quantities of cash from the KJ Accounts.

214. Based on my review of records produced by Check-Cashing Company-1, I have learned that on or about June 8, 2018, an individual matching the appearance of "Jorgelina Abreu Gil," based on law enforcement records and my personal experience with that individual, cashed a check worth approximately \$80,000 at Check-Cashing Company-1. According to text on the front of the check, the checks were Medicaid payments from the State of New York. Specifically, the checks were drawn from an account in the name of "Medical Assistance (Title XIX) Program" held at Bank-1.

Other Fraudulent Claims

215. In addition to the claims listed above for specifically identified Medicaid Enrollees, I believe, based on my investigation, my communications with other law enforcement officers, and my review of records, that a significant number of other claims submitted by the defendants were fraudulent.

216. As set forth above, KJ submitted a large number of transportation claims on days when the Medicaid patient did not have an associated claim for Medicaid-funded treatment on the same day.

217. Other law enforcement officers and I have reviewed text message and email communications involving various defendants in which the defendant is sending or receiving Medicaid information for a third party.

218. Other law enforcement officers and I have interviewed several other individuals, not specifically identified above, who never took trips with KJ or were paid for their trips, but for whom KJ submitted claims for Medicaid-funded transportation. Furthermore, these claims are attributable to specific defendants based on, among other

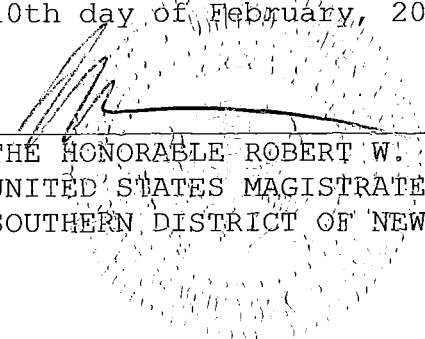
things, records of communications and Driver Numbers.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of JORGELINA ABREU GIL, JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PALMA BREA, CRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMENEZ HIDALGO, FRANCISCO SALAZAR, and NELSON DIAZ, a/k/a "Abdul Alamin", the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.



KYLE TALLIO
Special Agent
United States Department of
Homeland Security

Sworn to before me this
10th day of February, 2020



THE HONORABLE ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK