

United States Courts  
Southern District of Texas  
FILED

MAR 15 2017

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

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§

Criminal No.:

v.

17CR0141

PATRICIA ANN THOMAS

Defendant.

United States Courts  
Southern District of Texas  
FILED

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**INDICTMENT**

The Grand Jury charges:

**COUNT #1**  
**FALSE STATEMENTS TO FEDERAL AGENTS**  
**(Violation of 18 U.S.C. §1001)**

At all times material to this Indictment, unless otherwise specified:

1. The United States Department of Health and Human Services, Office of Inspector General – Office of Investigations (HHS/OIG) was a federal agency within the executive branch.
2. Special Agents working within the HHS-OIG conducted criminal, civil and administrative investigations of alleged fraud and misconduct related to HHS programs, operations and beneficiaries.
3. The Medicare Program (“Medicare”) was a federal healthcare program for people who are 65 or older, certain younger people with disabilities, and people with

End-Stage Renal Disease. The United States Department of Health and Human Services, through its agency, the Centers for Medicare and Medicaid Services (“CMS”) administered Medicare. Individuals receiving benefits under Medicare were referred to as “beneficiaries.”

4. Medicare was a “health care benefit program” as defined by Title 18, United States Code, Section 24(b).
5. Medicare paid for certain health care services in the home of beneficiaries if certain eligibility criteria were met and the services were considered reasonable and necessary for the treatment of the beneficiaries’ illness or injury. This was known as the Medicare home health benefit.
6. Defendant **PATRICIA ANN THOMAS**, a resident of Harris County, Texas, owned and operated independent living/group homes in Fresno, Fort Bend County, Texas. Many of the individuals residing in the group homes managed by **THOMAS** were Medicare beneficiaries purportedly receiving home health care services paid for by Medicare.
7. On or about April 15, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, defendant

**PATRICIA ANN THOMAS**

did knowingly and willfully make a material false and fraudulent statement in a matter within the jurisdiction of the executive branch of the government of the

United States. **THOMAS** freely and voluntarily provided a written and sworn statement to individuals who identified themselves as Special Agents of the United States Department of Health and Human Services, Office of Inspector General, knowing that the statement may be used as evidence. **THOMAS** falsely stated in substance that she never received money from health care providers for referring the residents of her group homes for home health services paid for by Medicare.

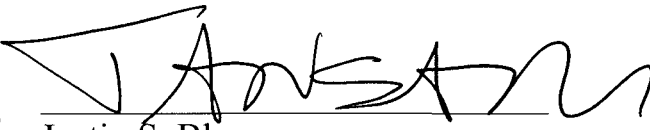
All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

~~FOR~~ PERSON

ABE MARTINEZ  
ACTING UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF TEXAS

*For*   
Justin S. Blan  
Special Assistant U.S. Attorney