

receipt and transfer of the proceeds from the fraud; and (d) diverting proceeds of the fraud for the personal use and benefit of the defendants and their co-conspirators.

Manner and Means of the Conspiracy

5. The manner and means by which the defendants and their co-conspirators sought to accomplish the purpose of the conspiracy included, among others, the following:

a. REINALDO WILSON and JEAN WILSON falsely certified to Medicare that they would comply with all Medicare rules and regulations, and federal laws, including that they would not knowingly present or cause to be presented a false and fraudulent claim for payment by Medicare and that they would comply with the Anti-Kickback statute.

b. REINALDO WILSON and JEAN WILSON created, owned, and/or controlled the ACC Network.

c. REINALDO WILSON, JEAN WILSON, and others, through the ACC Network, recruited, hired, and paid health care providers, in the District of New Jersey and elsewhere, to order Braces for Medicare beneficiaries.

d. REINALDO WILSON, JEAN WILSON, and others solicited and received illegal kickbacks and bribes from Person A, Person B, and others in exchange for the ordering, arranging for, and recommending the ordering of Braces for Medicare beneficiaries.

e. REINALDO WILSON, JEAN WILSON, and others caused the ACC Network to receive Medicare beneficiary information in order for the ACC Network health care providers to sign Brace orders.

f. REINALDO WILSON, JEAN WILSON, and others facilitated ordering of braces by refraining from charging a fee to Medicare beneficiaries or billing Medicare for purported telemedicine consultations conducted by the ACC Network health care providers.

g. REINALDO WILSON, JEAN WILSON, and others, through the ACC Network, paid health care providers to order Braces for Medicare beneficiaries that were procured through the payment of kickbacks and bribes, medically unnecessary, ineligible for Medicare reimbursement, and/or not provided as represented.

h. REINALDO WILSON, JEAN WILSON, and others transferred brace orders to Brace providers, Person A, Person B, recruiters, and others to support false and fraudulent claims to Medicare that were submitted by Brace providers, located in the District of New Jersey and elsewhere.

i. REINALDO WILSON, JEAN WILSON, and others concealed and disguised the payment and receipt of illegal kickbacks and bribes from the United States Department of Health and Human Services by causing them to be paid to the ACC Network indirectly through nominee companies and bank accounts, opened by REINALDO WILSON, JEAN WILSON and others.

j. REINALDO WILSON, JEAN WILSON, and others falsified, fabricated, altered, and caused the falsification, fabrication, and alteration of Brace orders and other records all to support claims for Braces that were obtained through illegal kickbacks and bribes, medically unnecessary, not eligible for Medicare reimbursement, and/or not provided as represented.

k. REINALDO WILSON, JEAN WILSON, and others also concealed and disguised the scheme from the United States Department of Health and Human Services by entering into sham contracts and agreements, labeling kickback and bribe payments as “medical” and “consultation” expenditures.

1. REINALDO WILSON, JEAN WILSON, and others caused the Brace providers to submit, and cause the submission of, an amount in excess of \$56 million for Brace orders that were obtained through illegal kickbacks and bribes, medically unnecessary, not eligible for Medicare reimbursement, and/or not provided as represented. Medicare paid these Brace providers in excess of \$28 million for these claims.

Overt Acts

6. In furtherance of the conspiracy and in order to accomplish the objects thereof, REINALDO WILSON, JEAN WILSON, and their co-conspirators committed and caused the commission of the following overt acts in the District of New Jersey and elsewhere:

a. In or around March 2017, REINALDO WILSON, JEAN WILSON, and others solicited and received an illegal kickback and bribe from Person A, and others in the form of a wire to ACC’s bank account ending in x0813 in the approximate amount of \$18,000.

b. In or around July 2017, REINALDO WILSON, JEAN WILSON, and others solicited and received an illegal kickback and bribe from Person A, and others in the form of a wire to ACC’s bank account ending in x0813 in the approximate amount of \$34,920.

c. In or around December 2018, REINALDO WILSON, JEAN WILSON, and others solicited and received an illegal kickback and bribe from Person A, and others in the form of a wire to AIM's bank account ending in x5326 in the approximate amount of \$5,000.

d. In or around January 2019, REINALDO WILSON, JEAN WILSON, and others solicited and received an illegal kickback and bribe from Person A, and others in the form of a wire to AIM's bank account ending in x5326 in the approximate amount of \$3,465.

In violation of Title 18, United States Code, Section 371.

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

7. Paragraphs 1, and 4 through 6 of the Indictment are re-alleged and incorporated by reference as though fully set forth herein.

8. From in or around March 2017, and continuing through in or around April 2019, in the District of New Jersey, and elsewhere, the defendants,

REINALDO WILSON, and
JEAN WILSON

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

a. to knowingly and willfully execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title

18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit programs, in connection with the delivery of and payment for health care benefits, items, and services, contrary to Title 18, United States Code, 1347; and

b. to knowingly and with the intent to defraud, devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and to knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice to defraud, contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

9. It was the object of the conspiracy for REINALDO WILSON, JEAN WILSON, and other co-conspirators to unlawfully enrich themselves by, among other things: (a) submitting or causing the submission of false and fraudulent claims to Medicare for claims based on kickbacks and bribes; (b) submitting or causing the submission of false and fraudulent claims to Medicare for services that were (i) medically unnecessary; (ii) not eligible for Medicare reimbursement; and/or (iii) not provided as represented; (c) concealing the submission of false and fraudulent claims to Medicare and the receipt and

transfer of the proceeds from the fraud; and (d) diverting proceeds of the fraud for the personal use and benefit of the defendants and their co-conspirators.

Manner and Means of the Conspiracy

10. The manner and means by which the REINALDO WILSON, JEAN WILSON, and their co-conspirators sought to accomplish the purpose of the conspiracy included, among others, the following:

a. REINALDO WILSON and JEAN WILSON falsely certified to Medicare that they would comply with all Medicare rules and regulations, and federal laws, including that they would not knowingly present or cause to be presented a false and fraudulent claim for payment by Medicare and that they would comply with the Anti-Kickback statute.

b. REINALDO WILSON and JEAN WILSON created, owned, and/or controlled the ACC Network.

c. REINALDO WILSON, JEAN WILSON, and others, through the ACC Network, recruited, hired, and paid health care providers, in the District of New Jersey and elsewhere, to order Braces for Medicare beneficiaries.

d. REINALDO WILSON, JEAN WILSON, and others solicited and received illegal kickbacks and bribes from Person A, Person B, and others in exchange for the ordering, arranging for, and recommending the ordering of Braces for Medicare beneficiaries.

e. REINALDO WILSON, JEAN WILSON, and others caused the ACC Network to receive Medicare beneficiary information in order for the ACC Network health care providers to sign Brace orders.

f. REINALDO WILSON, JEAN WILSON, and others facilitated ordering of braces by refraining from charging a fee to Medicare beneficiaries or billing Medicare for purported telemedicine consultations conducted by the ACC Network health care providers.

g. REINALDO WILSON, JEAN WILSON, and others, through the ACC Network, paid health care providers to order Braces for Medicare beneficiaries that were procured through the payment of kickbacks and bribes, medically unnecessary, ineligible for Medicare reimbursement, and/or not provided as represented.

h. REINALDO WILSON, JEAN WILSON, and others transferred brace orders to Brace providers, Person A, Person B, recruiters, and others to support false and fraudulent claims to Medicare that were submitted by Brace providers, located in the District of New Jersey and elsewhere.

i. REINALDO WILSON, JEAN WILSON, and others concealed and disguised the payment and receipt of illegal kickbacks and bribes from the United States Department of Health and Human Services by causing them to be paid to the ACC Network indirectly through nominee companies and bank accounts, opened by REINALDO WILSON, JEAN WILSON, and others.

j. REINALDO WILSON, JEAN WILSON, and others falsified, fabricated, altered, and caused the falsification, fabrication, and alteration of Brace orders and other records all to support claims for Braces that were obtained through illegal kickbacks and bribes, medically unnecessary, not eligible for Medicare reimbursement, and/or not provided as represented.

k. REINALDO WILSON, JEAN WILSON, and others also concealed and disguised the scheme from the United States Department of Health and Human Services by entering into sham contracts and agreements, labeling kickback and bribe payments as “medical” and “consultation” expenditures.

l. REINALDO WILSON, JEAN WILSON, and others caused the Brace providers to submit, and cause the submission of, an amount in excess of approximately \$56 million for Brace orders that were obtained through illegal kickbacks and bribes, medically unnecessary, not eligible for Medicare reimbursement, and/or not provided as represented. Medicare paid these Brace providers approximately in excess of \$28 million for these claims.

m. REINALDO WILSON, JEAN WILSON, and others, through the use of interstate wires, caused Medicare to make payments for services that were obtained through illegal kickbacks and bribes, medically unnecessary, not eligible for Medicare reimbursement, and/or not provided as represented.

In violation of Title 18, United States Code, Section 1349.

COUNTS THREE THROUGH FIVE
(Soliciting and Receiving of Health Care Kickbacks)

11. Paragraphs 1, 4 through 6, 7, and 8 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

12. On or about the dates set forth below, in the District of New Jersey, and elsewhere, the defendants,

REINALDO WILSON and
 JEAN WILSON

did knowingly and willfully solicit and receive remuneration, including kickbacks and bribes, directly and indirectly, overtly and covertly, in cash and in kind, in return for purchasing, leasing, ordering, and arranging for and recommending purchasing, leasing, and ordering any good, facility, service, and item for which payment may be made in whole and in part under a federal health care program, as defined by 42 U.S.C. § 1320a-7b(f), namely, Medicare, as follows:

Count	Date	Originating Account	Payee	Amount
3	March 17, 2017	Company A	ACC	\$18,000
4	July 17, 2017	Company A	ACC	\$34,920
5	December 10, 2018	Company B	AIM	\$5,000

In violation of 42 U.S.C. § 1320a-7b(b)(1)(B) and 18 U.S.C. § 2.

COUNT SIX
(Conspiracy to Commit Money Laundering)

13. Paragraphs 1, 4 through 6, 7, and 8 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

14. From in or around March 2017 through in or around the April 2019, in the District of New Jersey, and elsewhere, the defendants,

REINALDO WILSON and
JEAN WILSON

did knowingly, combine, conspire, confederate, and agree with each other, and others known and unknown, to commit certain offenses against the United States in violation of Title 18, United States Code, Section 1956, that is: to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000 and such property having been derived from a specified unlawful activity, that is, conspiracy to defraud the United States and pay and receive kickbacks relating to a health care benefit program, namely, Medicare, in violation of Title 18, United States Code, Section 371, and conspiracy to commit health care fraud and wire fraud, in violation of Title 18, United States Code, Section 1349, contrary to Title 18, United States Code, Section 1957.

In violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION
(Counts One, Three, Four, and Five)

15. Upon conviction of one or more of the Federal health care offenses as defined in 18 U.S.C. § 24 alleged in Counts One, Three, Four, and Five of this Indictment, the defendants,

REINALDO WILSON and
JEAN WILSON

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), all property, real and personal, the defendants obtained that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of such offense, and all property traceable to such property.

FORFEITURE ALLEGATION
(Count Two)

16. Upon conviction of the conspiracy offense in violation of 18 U.S.C. § 1349 alleged in Count Two of this Indictment, the defendants,

REINALDO WILSON and
JEAN WILSON

shall forfeit to the United States:

a. As to the conspiracy to violate 18 U.S.C. § 1347, pursuant to 18 U.S.C. § 982(a)(7), all property, real and personal, the defendants obtained that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of the conspiracy to violate 18 U.S.C. § 1347, and all property traceable to such property; and

b. As to the conspiracy to violate 18 U.S.C. § 1343, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, the defendants obtained that constitutes or is derived from proceeds

traceable to the commission of the conspiracy to violate 18 U.S.C. § 1343, and all property traceable to such property.

FORFEITURE ALLEGATION
(Count Six)

17. Upon conviction of the money laundering conspiracy offense in violation of 18 U.S.C. § 1956(h) alleged in Count Six of this Indictment, the defendants,

REINALDO WILSON and
JEAN WILSON

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the money laundering conspiracy offense, and all property traceable to such property.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

18. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- c. cannot be located upon the exercise of due diligence;
- d. has been transferred or sold to, or deposited with, a third person;
- e. has been placed beyond the jurisdiction of the Court;
- f. has been substantially diminished in value; or
- g. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18 United States Code, Section 982(b), to seek forfeiture of any other property of defendants REINALDO WILSON and JEAN WILSON up to the value of the forfeitable property described above.

A True Bill,


Foreperson 



RACHAEL A. HONIG
Attorney for the United States,
Acting Under Authority Conferred
By 28 U.S.C. § 515

ALLAN MEDINA
Chief, Healthcare Fraud Unit
Criminal Division, Fraud Section



DARREN C. HALVERSON
Trial Attorney
Criminal Division, Fraud Section

CASE NUMBER: 20-111 (km)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

REINALDO WILSON and JEAN WILSON

INDICTMENT FOR

**18 U.S.C. § 371, 18 U.S.C. § 1349, 42 U.S.C. § 1320a-7b(b)(1)(B),
18 U.S.C. § 2, and 18 U.S.C. 1956(h)**

**A True Bill,
[Redacted]
foreperson**

RACHAEL A. HONIG

**Attorney for the United States, Acting Under Authority Conferred By 28 U.S.C. § 515
FOR THE DISTRICT OF NEW JERSEY**

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