

COUNTY OR CIRCUIT COURT - CRIMINAL DIVISION
PINELLAS COUNTY, FLORIDA

STATE OF FLORIDA :
V. : WITNESS AFFIDAVIT
CARLA ANN MEJIA :

BEFORE ME, A NOTARY PUBLIC, personally appeared Law Enforcement Investigator Heather M. Stuart, who being duly sworn says:

Your Affiant, Heather M. Stuart, is a duly sworn Law Enforcement Investigator for the Office of the Attorney General Medicaid Fraud Control Unit for the State of Florida. Your Affiant states that beginning on or about March 1, 2005 and ending on or about September 30, 2005, CARLA ANN MEJIA did commit the offenses of Organized Fraud, Florida State Statute 817.034(4)(a)(1) to wit: did then and there engage in a systematic, ongoing course of conduct, with intent to defraud one or more persons, or with intent to obtain property from one or more persons by false or fraudulent pretenses, representations, or promises or willful misrepresentation of a future act, did obtain U.S. currency with an aggregate value of \$50,000.00 or more; and four counts of Criminal Use of Personal Identification Information, Florida State Statute 817.568(2)(a) to wit: did willfully and without authorization fraudulently

use personal identification information concerning an individual or individuals without first obtaining that individual's consent.

Your Affiant became involved in this investigation in November 2005, and received information from Dale Valentine, the Compliance Officer for Pediatric Services of America, Inc., that CARLA ANN MEJIA, the Location Director of the St. Petersburg office, located at 12225 28th Street N in St. Petersburg, Pinellas County, Florida, had tampered with the payroll and scheduling systems by creating false work schedules for employees, causing Medicaid, as administered by AHCA, located at 2727 Mahan Drive, Tallahassee, Leon County, Florida, to be billed for services that were never provided. Pediatric Services of America, Inc. is a Medicaid enrolled provider of pediatric day treatment centers, respiratory therapy and equipment services. It bills under Medicaid Provider #6500412-00.

Your Affiant interviewed the Staffing Coordinator for Pediatric Services of America, Inc., Theresa Horton, who at the relevant time periods was responsible for scheduling the employees and preparing the payroll reports for closing. Your Affiant learned that one of Horton's duties was to submit payroll reports to CARLA ANN MEJIA, who would then approve them. At that time, the reports would be sent to the Corporate office where the employee paychecks would be generated and Medicaid would be billed for services. The payroll checks would then be sent in a package to the St. Petersburg office where CARLA ANN MEJIA would distribute them to the employees.

Your Affiant learned that Theresa Horton began to notice some irregularities regarding the payroll reports in July 2005. Horton discovered that after she had provided a report to CARLA ANN MEJIA

for approval, CARLA ANN MEJIA returned it to her with additional employees' names (Sandra Pages-Myers and Carol Jones) that had not been previously scheduled to work. Your Affiant learned that Horton then reviewed the work schedules for the corresponding timeframe and discovered that the added employees' names, Sandra Pages-Myers and Carol Jones, had also been added to the schedules. Your Affiant learned that Horton contacted Jones and discovered that Jones had not worked at all during that time period. Your Affiant learned that numerous times from March 2005 to September 30, 2005, employees Sandra Pages-Myers, Carol Jones, Mary Jo Barrott, Kathleen Cleveland, Tina Van Doren-Ruppell, Stephanie Doehleman, and Carolyn Beausoleil appeared on the payroll reports and/or schedules when they did not work or provide services to any patients or Medicaid recipients.

Your Affiant interviewed the above employees regarding the altered monthly schedules. Each employee denied working for the recipients who were scheduled during the specified months and times. Some employees were able to verify their work schedule by comparing the fraudulent schedule to their personal date books or financial records on their home computers. Most of the employees provided service to the same recipient, and when they reviewed the fraudulent schedules they did not recognize any of the patient names as being regular customers. A large number of patients involved in these fraudulent schedules and payroll reports are Medicaid recipients. Your Affiant's investigation revealed and determined that the altered schedules and payroll reports caused Medicaid to be billed \$150,859.18 for services not rendered. Your Affiant also learned that CARLA ANN MEJIA received bonuses based on increased hours and revenue generated at the St. Petersburg office of Pediatric Services of America, Inc.

Your Affiant also obtained copies of the payroll checks generated for the times when the employees named above were not actually working. The checks were written with these employees' names as the payees and were also endorsed in the same name on the back of the check. Many were also co-endorsed in the name CARLA MEJIA. Each employee verified that the signature on the back of each paycheck was not their signature, and also that they had not given anyone else permission to sign their names or endorse checks in their names. The employees also confirmed that the bank accounts and the bank name written on the back of the paychecks were not their financial institutions. Your Affiant received bank account statements and deposits for the MacDill Federal Credit Union bank account belonging to CARLA ANN MEJIA and discovered that the fraudulent and forged payroll checks had been deposited into the account in the amount of \$14,261.94. Additionally, \$3,213.48 was deposited into the account of Carolyn Beausoleil for payment of a loan regarding the purchase of a vehicle by CARLA ANN MEJIA from Ms. Beausoleil. Furthermore, CARLA ANN MEJIA received bonus money from Pediatric Services of America, Inc. for the increased billing in the amount of \$4,124.00.

Your Affiant interviewed CARLA ANN MEJIA on November 17, 2005. CARLA ANN MEJIA admitted to changing the payroll reports which generated the paychecks. CARLA ANN MEJIA admitted she forged the payee's signature on checks and deposited them into her account at MacDill Federal Credit Union. She was also questioned about the monthly employee schedules for the time period of this investigation. Your Affiant presented her the employee schedules of those involved in this investigation. CARLA ANN MEJIA admitted she altered her own schedule which created fraudulent billing to Medicaid for services not provided, but denied altering the other employees' schedules.

Wherefore, your Affiant respectfully requests this Honorable Court to issue a capias for the arrest of CARLA ANN MEJIA for the offenses of Organized Fraud, a first degree felony, Florida State Statute 817.034(4)(a)(1), and four counts Criminal Use of Personal Identification Information, a third degree felony, Florida State Statute 817.568(2)(a), so that she may be made to answer to the charges.

The foregoing instrument was acknowledged before me this ____ day of August, 2006 by

Affiant

_____,
who is personally known to me or has produced _____ as identification and who did take an oath.

Affiant's Address

NOTARY PUBLIC

Affiant's Telephone Number

County Court or Circuit Court -
Criminal Division, Pinellas County, Florida

FINDING OF PROBABLE CAUSE

I, _____, have reviewed this affidavit and do find there is
probable cause to hold and bind over for trial the defendant named in this affidavit.

<p>Clerk of this Court is hereby directed to ISSUE CAPIAS for arrest of Defendant</p> <p>CARLA ANN MEJIA</p> <p>Defendant is to be admitted to Bail in</p> <p>the sum of \$ _____.</p> <p style="padding-left: 40px;">Including surcharge</p> <p>_____</p> <p>County / Circuit Judge</p>
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JUDGE

DATE