

**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT  
IN AND FOR VOLUSIA COUNTY, FLORIDA**

STATE OF FLORIDA,

COURT CASE NO.: \_\_\_\_\_

Plaintiff,

v.

OSWP No.: 2005-0069-CFB

VIDYA BHOOLAI,

Defendant.

\_\_\_\_\_ /

INFORMATION FOR:

COUNT 1:           ORGANIZED FRAUD  
                      \$50,000 OR MORE  
                      F.S. 817.034(4)(a)  
                      F-1

COUNTS 2-26:     MEDICAID  
                      PROVIDER FRAUD  
                      F.S. 409.920(2)(a)  
                      F-3

**IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA**

**COUNT 1: ORGANIZED FRAUD \$50,000 OR MORE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES THAT beginning on or about July 2, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **VIDYA BHOOLAI**, did engage in a scheme to defraud, to-wit: a systematic, ongoing course of conduct, intending to defraud one or more persons, to-wit: **the Florida Medicaid program, Agency for Health Care Administration**, as administrator, or intending to obtain property from one or more of these same persons by false or fraudulent pretenses, representations or promises, or willful misrepresentations of a future act, and in so doing did obtain property, to-wit: United States Currency with an aggregate value of \$50,000 or more, in violation of Florida Statute 817.034(4)(a).

## **COUNT 2: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Geraldine Apfelbeck**, in violation of Florida Statute 409.920(2)(a).

## **COUNT 3: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient James Austin**, in violation of Florida Statute 409.920(2)(a).

## **COUNT 4: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Irene Bricault-Pedroso**, in violation of Florida Statute 409.920(2)(a).

## **COUNT 5: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Lloyd Coleman**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 6: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Timothy Combs**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 7: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Clint Doddridge**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 8: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Kristopher Doski**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 9: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Martin Dupont**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 10: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Vanessa Gooden**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 11: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Benjamin Hogg**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 12: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient William Hollis**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 13: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Larry Huyser**, in violation of Florida Statute 409.920(2)(a).

#### **COUNT 14: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Roger E. Kelly**, in violation of Florida Statute 409.920(2)(a).

#### **COUNT 15: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient John Kitchen**, in violation of Florida Statute 409.920(2)(a).

#### **COUNT 16: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Jack Littles**, in violation of Florida Statute 409.920(2)(a).

#### **COUNT 17: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Theresa Luby**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 18: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Leonardo Mirando**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 19: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Daniel Oakes**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 20: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Troy Pender**, in violation of Florida Statute 409.920(2)(a).

### **COUNT 21: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Alexander Roscillo**, in violation of Florida Statute 409.920(2)(a).

## **COUNT 22: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Michael Smith**, in violation of Florida Statute 409.920(2)(a).

## **COUNT 23: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Edward Von Derahe**, in violation of Florida Statute 409.920(2)(a).

## **COUNT 24: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Mark Warner**, in violation of Florida Statute 409.920(2)(a).

## **COUNT 25: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Brenda Woodle**, in violation of Florida Statute 409.920(2)(a).

**COUNT 26: MEDICAID PROVIDER FRAUD**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2002 and continuing through and including on or about November 30, 2004, in the Second and Seventh Judicial Circuits of Florida, to wit: Leon and Volusia Counties, Florida, **Vidya Bhoelai** did knowingly make, cause to be made or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim submitted to the **Florida Medicaid program, Agency for Health Care Administration**, as administrator, or its fiscal agent for payment, to wit: did cause multiple claims for services to be submitted for **Rising Sun Manor** which were not rendered to **recipient Robert Zickella**, in violation of Florida Statute 409.920(2)(a).

AND SAID OFFENSES OCCURRED IN TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA AS PART OF A RELATED TRANSACTION OR SAID OFFENSES WERE CONNECTED WITH AN ORGANIZED CRIMINAL CONSPIRACY AFFECTING TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA.

PETER H. WILLIAMS  
STATEWIDE PROSECUTOR  
STATE OF FLORIDA

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DAN R. MOSLEY  
Assistant Statewide Prosecutor  
Florida Bar Number 856843  
135 West Central Boulevard  
Suite 1000  
Orlando, Florida 32801  
(407) 245-0893

STATE OF FLORIDA  
COUNTY OF ORANGE

Personally appeared before me, Dan R. Mosley, Assistant Statewide Prosecutor for the State of Florida, who, being first duly sworn, says that he has received testimony under oath from the material witnesses which, if true, would constitute the offenses herein charged, and that this prosecution is instituted in good faith.

Sworn to and subscribed before me this \_\_\_\_ day of April, 2005, by Dan R. Mosley, who is personally known to me.

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Amy Romero  
Notary Public  
State of Florida at Large

**DEFENDANT'S BIOGRAPHICAL DATA:**

**VIDYA BHOOLAI**

R/S: B/F

DOB: 06/26/1963

SSN: 769-03-4879

LKA: 700 Daytona Ave.  
Holly Hill, FL 32117