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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

UNITED STATES OF AMERICA	:	CRIMINAL NO. 5:26-CR-_____
	:	
v.	:	VIOLATIONS:
	:	18 U.S.C. § 1347
DAWN JAMES-ELLIS,	:	18 U.S.C. § 1349
LAMONICA LAKES,	:	18 U.S.C. § 1028A(a)(1)
TARSHEA FUDGE-RILEY,	:	18 U.S.C. § 981(a)(1)(C)
ANGELA CHILDS,	:	18 U.S.C. § 982(a)(7)
ADRIAN HARRIS,	:	28 U.S.C. § 2461(c)
	:	
Defendants.	:	<u>FILED UNDER SEAL</u>
	:	

THE GRAND JURY CHARGES:

BACKGROUND

1. At all relevant times, DAWN JAMES-ELLIS was a licensed therapist living and operating her therapy practice, Therapy On the Go, in Montezuma, Georgia.

2. At all relevant times, LAMONICA LAKES, TARSHEA FUDGE-RILEY, and ANGELA CHILDS, at JAMES-ELLIS’s direction, created therapy session notes for JAMES-ELLIS.

3. Therapy session notes are required by health care benefit programs to be created and kept by licensed therapy practices in the event a health care benefit program wishes to review the notes before authorizing and issuing payment for services rendered, which is often referred to as “pre-payment review.”

4. At all relevant times, Victim No. 1 was insured by a health care benefit program as defined in Title 18, United States Code, Section 24(b).

5. At all relevant times, ADRIAN HARRIS and her immediate family members were insured by a health care benefit program as defined in Title 18, United States Code, Section 24(b).

6. The Employee Retirement Income Security Act (“ERISA”) is a federal law that sets standards for most voluntarily established pension and health care plans in private industry to protect individuals covered by these plans.

7. Private insurance companies, including Blue Cross Blue Shield, Aetna, Cigna, and Optum, offer health care coverage directly to consumers and through employers, including ERISA and non-ERISA health care plans. They also manage health care plans offered to federal employees. These health care plans affect commerce and cover medical and clinical treatment costs in accordance with the terms of their policies and state and federal law, including requirements that testing and treatment be medically necessary, provided by properly licensed facilities, and provided in accordance with the terms of the health care plans’ contracts.

8. At all relevant times, Blue Cross Blue Shield, Aetna, Cigna, and Optum were health care benefit programs as defined in Title 18, United States Code, Section 24(b).

COUNT ONE
(Conspiracy to Commit Health Care Fraud)

9. Beginning from as late as January 2019, and continuing until in or about December 2022, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court, the defendants,

**DAWN JAMES-ELLIS,
LAMONICA LAKES,
TARSHEA FUDGE-RILEY,
ANGELA CHILDS,
ADRIAN HARRIS,**

and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with each other to commit an offense against the United States, to wit, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud Blue Cross Blue Shield, Aetna, Cigna, Optum, and other health care benefit

programs affecting commerce as defined in Title 18, United States Code, Section 24(b), 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, Blue Cross Blue Shield, Aetna, Cigna, Optum, and other health care benefit programs in connection with the delivery of and payment for health care benefits, items, and services. All in violation of Title 18, United States Code, Section 1347.

Scheme to Defraud

10. The object of the scheme and conspiracy were for the defendants to cause fraudulent insurance claims for mental health therapy sessions to be submitted to Blue Cross Blue Shield, Aetna, Cigna, Optum, and other health care benefit programs in order for JAMES-ELLIS to receive payments for therapy sessions she did not provide for her personal benefit.

11. As part of the scheme and conspiracy, JAMES-ELLIS paid LAKES, FUDGE-RILEY, CHILDS, and HARRIS for their willful and knowing participation in the scheme and conspiracy, which they used for their personal benefit.

Manner and Means

12. To orchestrate this scheme, the defendants submitted claims for, caused claims to be submitted for and fraudulently fabricated information related to therapy sessions they knew never occurred.

13. In some instances, the claims for therapy sessions submitted to a health care benefit program were backdated as if JAMES-ELLIS provided therapy sessions for an individual before the individual commenced therapy sessions. In other instances, the claims submitted indicated the sessions were held after the individuals ceased receiving therapy sessions.

14. Still in other instances, JAMES-ELLIS would provide individuals with therapy in family or group sessions and then submit and cause to be submitted fraudulent claims to a health care benefit program for each individual within the family or group session. JAMES-ELLIS also submitted and caused to be submitted claims as if she were treating several individuals within the same family or group, when in fact she was treating only some or one of the individuals.

15. JAMES-ELLIS would often submit and cause to be submitted fraudulent claims for over twenty-four hours of therapy sessions that purportedly occurred in a single day. JAMES-ELLIS would also submit and cause to be submitted fraudulent claims for therapy sessions that purportedly occurred on weekends, holidays, and when she was away on vacation and not administering therapy sessions.

16. As part of the scheme and conspiracy, HARRIS received payment from JAMES-ELLIS for providing her and her family's health care benefit program and plan information to JAMES-ELLIS knowing that JAMES-ELLIS would submit and cause to be submitted fraudulent claims to the health care benefit program for therapy sessions never rendered.

17. As part of the scheme and conspiracy, JAMES-ELLIS also paid others for providing their and their family's health care benefit program and plan information to JAMES-ELLIS knowing that JAMES-ELLIS would submit and cause to be submitted fraudulent claims to their health care benefit program for therapy sessions never rendered.

18. As part of the scheme and conspiracy, JAMES-ELLIS, without the knowledge of some individuals, used the individuals' health care benefit program and plan information to which she was originally provided lawful access to submit and cause to be submitted fraudulent claims to their respective health care benefit program for therapy services never received.

19. HARRIS's fraudulent involvement in the scheme and conspiracy as outlined above began at some point in 2021 and ended at some point in 2022.

20. As part of the scheme and conspiracy, LAKES, FUDGE-RILEY, and CHILDS knowingly and willfully created fraudulent therapy session notes for JAMES-ELLIS for therapy sessions that JAMES-ELLIS, LAKES, FUDGE-RILEY, and CHILDS knew did not occur. JAMES-ELLIS paid LAKES, FUDGE-RILEY, and CHILDS per note created.

21. The fraudulent therapy session notes revealed anomalies and inconsistencies, which were markers of fraudulent entries. For instance, some notes were often created on a date that was months, if not years, later than when the therapy sessions allegedly occurred. Some notes were created minutes, if not seconds, apart from each other, were generic, lacked substance, and the exact wording used to describe the patient's mood and appearance would be repetitious. Other notes contained patient information, but the session information sections were left blank. The vast majority of the notes did not have an electronic signature by JAMES-ELLIS. JAMES-ELLIS and her co-conspirators intentionally omitted the electronic signature because when a provider electronically signs a note, the electronic signature carries a timestamp that cannot be edited or altered by the therapist. The presence of an electronic signature makes it impossible to backdate notes and fabricate sessions. JAMES-ELLIS and her co-conspirators were aware of the impact of electronic signatures, and their omission of them was an intentional act in furtherance of their scheme to defraud.

22. Knowing that these therapy session notes were fraudulent and that she did not conduct the sessions outlined in the notes, JAMES-ELLIS nevertheless submitted and caused to be submitted fraudulent claims to Blue Cross Blue Shield, Aetna, Cigna, Optum, and other health care benefit programs in exchange for payment from the health care benefit programs.

23. When certain health care benefit programs began to suspect they were being defrauded by JAMES-ELLIS, JAMES-ELLIS was placed on pre-payment review by those health care benefit programs in 2022. JAMES-ELLIS thereafter submitted and caused to be submitted what she knew to be fraudulent therapy session notes created by LAKES, FUDGE-RILEY, and CHILDS to the health care benefit programs in an effort to be paid by the health care benefit programs for the therapy sessions that never occurred.

24. LAKES's fraudulent involvement in the scheme and conspiracy as outlined above began as late as January 2019 and ended as early as December 2022, with the exact dates being unknown to the Grand Jury.

25. FUDGE-RILEY's fraudulent involvement in the scheme and conspiracy as outlined above began as late as September 2020 and ended as early as June 2022, with the exact dates being unknown to the Grand Jury.

26. CHILDS's fraudulent involvement in the scheme and conspiracy as outlined above began as late as March 2022 and ended as late as June 2022, with the exact dates being unknown to the Grand Jury.

27. As a result of the defendants' scheme and conspiracy, health care benefit programs were fraudulently billed for and made payments to JAMES-ELLIS and Therapy On the Go totaling millions of dollars for services which JAMES-ELLIS knew she had not, in fact, provided.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Identity Theft)

28. Beginning from about July 2022 and continuing until in or about August 2022, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court, the defendant,

DAWN JAMES-ELLIS,

did knowingly transfer, possess, and use, without lawful authority, means of identification of another person, to wit: the name and all or part of the date of birth of Victim No. 1, whose identity is known to the Grand Jury. The defendant did so in relation to the commission of a felony enumerated in Title 18, United States Code, Section 1028A(c)(5), to wit: Title 18, United States Code, Section 1347. All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE NOTICE

(18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(7), and 28 U.S.C. § 2461(c) – Criminal Forfeiture)

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C), in conjunction with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982(a)(7).

2. Upon conviction of the offense(s) in violation of Title 18, United States Code, Section 1349, in connection with Title 18, United States Code, Section 1347, set forth in Count One; and/or Title 18, United States Code, Section 1028A(a)(1) set forth in Count Two of this Indictment, the defendant(s),

**DAWN JAMES-ELLIS,
LAMONICA LAKES,
TARSHEA FUDGE-RILEY,
ANGELA CHILDS,
ADRIAN HARRIS,**

shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(C), in conjunction with Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s), or a conspiracy to commit such offense; and/or any property, real or personal, that constitutes or is

derived, directly or indirectly, from gross proceeds traceable to the commission of the offense(s), pursuant to Title 18, United States Code, Section 982(a)(7), including, but not limited to, a personal money judgment in an amount to be determined.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

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

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), through Title 18, United States Code, Section 981(a)(1)(C), and Title 18, United States Code, Section 982(b)(1).

All pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(7), and 28 U.S.C. § 2461(c).

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

Presented by:

WILLIAM R. KEYES
UNITED STATES ATTORNEY



HANNAH M. COUCH
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 10 day of March, AD 2026.



Deputy Clerk