

FILED

MAR -1 2017

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
RUSSELL JAMES HALL,)
)
Defendant.)

4:17CR098 RLW

INFORMATION

The Defendant

The United States Attorney charges that:

1. At all times relevant to this charge, defendant Russell James Hall (“Hall”) was a resident of Knox County, Missouri. Hall was employed by an ambulance district that maintained an office in Edina, Missouri, in Knox County, Missouri, all within the Northern Division of the Eastern District of Missouri.

Background

The Ambulance District and the Medicare Program

2. The Knox County Ambulance District (“KCAD”) is a local government entity that provides ambulance and emergency response services to Knox County residents.

3. The United States Department of Health and Human Services administers the Medicare program. The Medicare program is a health care benefit program within the meaning of 18 U.S.C. § 24(b) that affects interstate commerce. Funded by tax-payer revenue, the Medicare program provides elderly and disabled citizens of Missouri with medical benefits, items, and services.

4. Under certain circumstances, the Medicare program provides reimbursement to entities that provide ambulance transport for persons covered by the Medicare program,

including fee-based reimbursement for ambulance services that included basic or advanced life support. KCAD was and is enrolled in the Medicare program, and periodically submitted claims and requested reimbursement from the Medicare program for ambulance services it provided to persons covered by the Medicare program.

5. From January 1, 2015 through December 31, 2015, KCAD received in excess of \$10,000 from the Medicare program as reimbursement for ambulance transports. From January 1, 2016 through December 31, 2016, KCAD received in excess of \$10,000 from the Medicare program as reimbursement for ambulance transports. When the Medicare program paid KCAD for ambulance transports during 2015-16, it sent deposits to a KCAD bank account numbered **35.

6. As a salaried employee of KCAD during 2011-15, Hall was entitled to four weeks of vacation, covering two pay periods or 160 hours of work. KCAD paid salaries to Hall and other KCAD employees using checks drawn on a KCAD bank account numbered **35. During 2011, 2012, and 2013, KCAD paid Hall vacation pay equivalent to two pay periods. From on or about June 27, 2014 to June 1, 2015, Hall wrote and cashed approximately twenty checks drawn on KCAD's account numbered **35 for vacation salary in excess of the four weeks of vacation that he was entitled to for each of those years. These checks paid Hall approximately \$24,607.

7. As a salaried employee of KCAD during 2011-15, Hall was entitled to extra pay if he worked extra shifts beyond his regular work schedule. Typically, if Hall actually worked an extra shift at KCAD, another employee would sign the check approving the extra shift pay. From on or about May 8, 2013 through on or about May 26, 2015, Hall wrote and cashed approximately twelve checks for extra shifts that he did not actually work, without an authorizing signature from another KCAD employee. These checks paid Hall approximately \$3,876.

8. All of Hall's checks discussed above in this Information in paragraphs 6-7 were part of Hall's single scheme, common plan, and continuing course of conduct to embezzle, steal, obtain by fraud, obtain without authority, and convert the money, property, and funds of KCAD for Hall's own personal benefit.

Count 1

9. Paragraphs 1 through 8 are incorporated by reference, as if fully set forth herein.

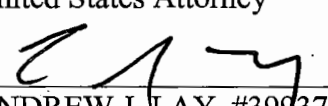
10. On or about June 1, 2015, in Knox County, in the Northern Division of the Eastern District of Missouri, and elsewhere,

RUSSELL JAMES HALL,

the defendant herein, being an agent of the Knox County Ambulance District, a local government entity that received in the one year period beginning on January, 1, 2015 benefits in excess of \$10,000 from the Medicare program, embezzled, stole, obtained by fraud, obtained without authority, knowingly converted to his use when he was not the rightful owner, and intentionally misapplied money and property worth at least \$5,000 that was owned by, under the care of, under the custody of, and under the control of the Knox County Ambulance District, including a June 1, 2015 check from Knox County Ambulance District's bank account made out to defendant in the amount of \$1,211.04, all in violation of 18 U.S.C. § 666(a)(1)(A) and 2.

Respectfully submitted,

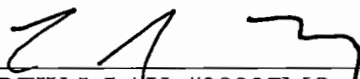
RICHARD G. CALLAHAN
United States Attorney



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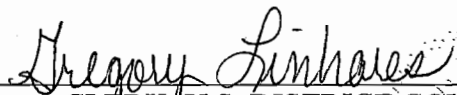
UNITED STATES OF AMERICA)
NORTHERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Andrew J. Lay, Assistant United States Attorney for the Eastern District of Missouri,
being duly sworn, do say that the foregoing information is true as I verily believe.

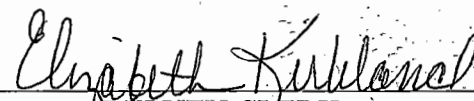


ANDREW J. LAY, #39937MO

Subscribed and sworn to before me this 13 day of February, 2017.



CLERK, U.S. DISTRICT COURT

By: 

DEPUTY CLERK