

INDICTMENT

STATE OF LOUISIANA

19th JUDICIAL DISTRICT COURT

FOR THE PARISH OF EAST BATON ROUGE

FILED
2014 SEP 23 AM 11:22
EAST BATON ROUGE


STATE OF LOUISIANA

VERSUS

**BRUCE GREENSTEIN (WM 7/11/69)
8219 45th AVENUE NE
SEATTLE, WASHINGTON**



A TRUE BILL

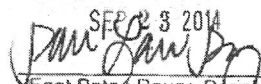
BY: 
FOREPERSON

NO. _____

DIVISION _____

FACTUAL BACKGROUND

Defendant Bruce Greenstein ("Greenstein") became Secretary of the Louisiana Department of Health and Hospitals ("DHH"), an appointed public position, on September 15, 2010 and was terminated by the Governor's Office on May 1, 2013. The following felony charges are based upon facts concerning (1) the publication by DHH in 2010 of a Request for Proposal ("RFP") which sought bids from vendors to provide Medicaid billing services and which was eventually awarded to Greenstein's former private employer, Client Network Services Inc. ("CNSI"), in 2011; (2) the creation and issuance of "Addendum No. 2" to the original RFP on January 10, 2011; (3) the issuance and applicability of a letter signed by Greenstein on September 27, 2010, which required that DHH employees involved in the bidding process have no contact with bidders or their representatives; (4) the number and nature of telephonic contacts between Greenstein and CNSI during his term as Secretary of DHH; and (5) Greenstein's testimony, taken under oath, before the Louisiana Senate Committee on Senate and Governmental Affairs on June 17, 2011; deposition testimony taken on October 29, 2013, in a civil matter entitled "CNSI vs. State of

SEP 23 2014

East Baton Rouge Parish
Deputy Clerk of Court

Louisiana, et al." filed under No. 621,271 in the 19th Judicial District Court, Parish of Baton Rouge; and Grand Jury testimony taken on June 3, 2014 before the Grand Jury for the Parish of East Baton Rouge, relative to the above-referenced facts, and to other relevant and material information.

OFFENSES

On the 23rd day of September, 2014, the Grand Jury for the Parish of East Baton Rouge, State of Louisiana, charges that in the Parish, District and State aforesaid,

BRUCE GREENSTEIN

Committed the following offenses:

COUNT 1

On June 17, 2011 during his testimony under oath before the Louisiana Senate Committee on Senate and Governmental Affairs, Greenstein was questioned by Senator Robert Marionneaux regarding the creation of "Addendum No. 2" to the original DHH bid proposal ("RFP"), which was issued by DHH at Greenstein's direction on January 10, 2011 and which allowed Greenstein's former employer, CNSI, to remain as a bidder in spite of the fact that CNSI would have been disqualified under the terms of the original RFP due to their lack of an important qualification. Senator Marionneaux asked Greenstein if the "expansion of scope" of the RFP accomplished by Addendum No. 2 "allowed CNSI to then submit a plan which they otherwise would not have been qualified to submit." Greenstein responded as follows: "I don't know if they would have not, not qualified to bid." Greenstein's reply to Senator Marionneaux constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123 (A) and (C)(4).

COUNT 2

The State of Louisiana realleges the facts and circumstances contained within Count 1 and further alleges that, in a further response to Senator Marionneaux, Greenstein replied: "My goal Senator, the whole way has been to have the most competition, all of these vendors submitted letters of intent and had been engaged with the department before I was here. So, it wasn't as if the

idea was that what I said created an opportunity that didn't exist before." Greenstein's reply to Senator Marionneaux constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(A) and (C)(4).

COUNT 3

Following Senator Marionneaux's questioning on June 17, 2011, Senator Peterson asked Greenstein additional questions regarding his memory of an email regarding Addendum No. 2 which was sent between Greenstein and his former employer, CNSI founder Adnan Ahmed, on January 7, 2011, three days before DHH, acting on Greenstein's direction, issued Addendum No. 2 on January 10, 2011 to satisfy Ahmed and keep CNSI from being disqualified from bidding due to their lack of a relevant financial qualification. Referencing Greenstein's earlier Senate testimony on June 8, 2011, Senator Karen Carter Peterson asked Greenstein: "Why did you say last week under oath that you didn't have any conversations about 'anything' that was contained in the RFP?" Greenstein responded: "That's what I remembered at the time, and when I saw the January 7 email I recognized I had that exchange." Greenstein's reply to Senator Peterson constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(A) and (C)(4).

COUNT 4

The State of Louisiana realleges the facts and circumstances contained within Counts 1-3 and further alleges that, in a further response to Senator Peterson, Greenstein replied: "I was not trying to mislead anyone, I was nervous at the time, I was trying to think back to the time frames when your questions were pertaining toI know for sure that I had no conversations about how the proposals were evaluated, scores, were the decisions being made, all the parts that produced to who the winning bidder was. I could just not remember the degree to which I was involved in the interactions during that time. There were very few, and I just couldn't remember when I didn't have any more discussions about it." Greenstein's reply to Senator Peterson constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false

statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(A) and (C)(4).

COUNT 5

On June 3, 2014, under oath before the East Baton Rouge Parish Grand Jury, Greenstein testified falsely regarding the nature of his voluminous contacts with CNSI official Creighton Carroll. This testimony constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(A) and (C)(4).

COUNT 6

On June 3, 2014, under oath before the East Baton Rouge Parish Grand Jury, Greenstein testified falsely regarding the applicability of a letter to Greenstein issued by Greenstein to DHH personnel on September 27, 2010 which forbade relevant employees from contact with bidders. This testimony constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(A) and (C)(4).

COUNT 7

On June 3, 2014, under oath before the East Baton Rouge Parish Grand Jury, Greenstein testified falsely regarding the creation of and his intent in issuing Addendum No. 2. This testimony constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(C)(4).

COUNT 8

On June 3, 2014, under oath before the East Baton Rouge Parish Grand Jury, Greenstein testified falsely regarding legal advice that he claimed to have received from DHH Staff Attorney Stephen Russo. This testimony constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(A) and (C)(4).

COUNT 9

On June 3, 2014, under oath before the East Baton Rouge Parish Grand Jury, Greenstein testified falsely regarding his confrontation by DHH and Administration officials prior to his second testimony before the Senate on June 17, 2011, and their attempts to discover the truth regarding the number and nature of his contacts with CNSI while serving in a public capacity as DHH Secretary. This testimony constitutes **PERJURY**, as defined by Louisiana Revised Statute 14:123, in that it is a materially false statement made knowingly and intentionally by Greenstein in violation of La. R.S. 14:123(A) and (C)(4).

**JAMES D. CALDWELL
ATTORNEY GENERAL
STATE OF LOUISIANA**



**DAVID CALDWELL
BUTCH WILSON
ASSISTANT ATTORNEYS GENERAL
PUBLIC CORRUPTION UNIT
LOUISIANA DEPARTMENT OF JUSTICE**

Filed September 23 2014



DEPUTY CLERK

FILED
2014 SEP 23 AM 11:22
DEPARTMENT OF JUSTICE