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OCT 14 2005 *R*ROBERT H. SHERWELL, CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

**UNITED STATES DISTRICT COURT**  
**WESTERN DISTRICT OF THE STATE OF LOUISIANA**  
**SHREVEPORT DIVISION**

UNITED STATES

\* DOCKET NO.: 04-50150-01

VERSUS

\* JUDGE: HICKS

JAMES DAN REID

\* MAGISTRATE: HORNSBY

**MOTION TO DELAY REPORT DATE**  
**TO U.S. BUREAU OF PRISONS**

NOW INTO COURT, through undersigned counsel, comes defendant JAMES DAN REID, who respectfully represents and moves as follows:

1.

Defendant is to report to the U.S. Bureau of Prisons facility in Jessup, Georgia, no later than 2:00 p.m. on Monday, October 17, 2005.

2.

Without promising Mr. Reid anything the court encouraged Mr. Reid to cooperate with the Louisiana Attorney General's office in their ongoing investigation of certain individuals and indicated at sentencing that it would consider a Rule 35 if filed by the government.

3.

As is indicated in the attached letter Mr. Ellison Travis, Assistant Attorney General for the State of Louisiana, Mr. Reid has actively cooperated and has been in constant communication with the state and that the delay in the State's investigation has been due to the hurricanes and the aftermath.

4.

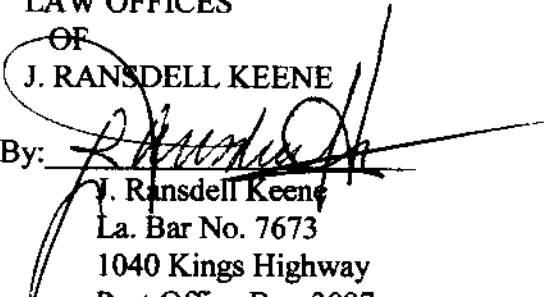
In view of all of the above Mr. Reid respectfully requests and moves the Court to issue the

appropriate Order to the Marshal, the Attorney General and the U.S. Bureau of Prisons modifying Mr. Reid's report date to 90 days from Monday, October 17, 2005 to January 17, 2006.

WHEREFORE, mover, JAMES DAN REID, prays that the court grant him a delay to report to the U. S. Bureau of Prisons.

Respectfully submitted,

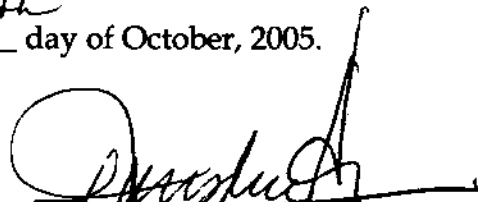
LAW OFFICES  
OF  
J. RANDELL KEENE

By:   
J. Ransdell Keene  
La. Bar No. 7673  
1040 Kings Highway  
Post Office Box 3097  
Shreveport, LA 71133-3097  
(318) 221-5770

**CERTIFICATE**

I HEREBY CERTIFY that a copy of the above foregoing Motion to Delay Report Date to U.S. Bureau of Prisons has this day been forwarded to Assistant U. S. Attorney Joseph Jarzabek, via facsimile.

Shreveport, Louisiana this the 14<sup>th</sup> day of October, 2005.

  
J. Ransdell Keene

LAW OFFICES OF  
J. RANSDALL KEENE

J. RANSDALL KEENE

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ROBERT H. SHENWELL, CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

October 14, 2005

1040 KINGS HIGHWAY  
SHREVEPORT, LOUISIANA 71104  
TELEPHONE (318) 221-5770  
FACSIMILE (318) 222-3406

Honorable S. Maurice Hicks  
U.S. District Court Judge  
Western District of Louisiana  
Shreveport Division  
United States Courthouse  
300 Fannin Street, Ste. 1167  
Shreveport, Louisiana 71101

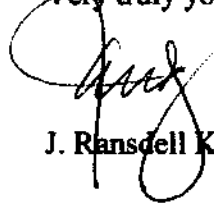
RE: United States vs. Dan Reid

Dear Judge Hicks:

I am sorry for the rush on this but we have been requesting confirmation from the Louisiana Attorney General's Office for over two (2) weeks.

Thanking you for your consideration, I am

Very truly yours



J. Ransdell Keene

JRK/td  
cc: J. Jarzebek

# LOUISIANA DEPARTMENT OF JUSTICE

## Criminal Division Medicaid Fraud Control Unit



**CHARLES C. FOULK JR.  
ATTORNEY GENERAL**

### FAX TRANSMITTAL

TELEPHONE: (225) 326-6210

FAX: (225) 326-6295

\*\*\*\*\*

DATE: October 14, 2005

TO: Randy Keene

FAX NUMBER: (318) 222-3406

FROM: Ellison Travis

Number Of Pages: 2 (Including This Page)

IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CONTACT:

Andrew LeJeune AT: (225) 326-6210

COMMENTS: Randy, this is the letter to Dan Daid. If you have any questions, please feel free to contact Ellison Travis at 1-888-799-6885. Thanks, Andrew LeJeune



State of Louisiana  
DEPARTMENT OF JUSTICE  
P.O. BOX 94005  
BATON ROUGE  
70804-9005

CHARLES C. FOTI, JR.  
ATTORNEY GENERAL

October 14, 2005

VIA FAX (318) 222-3406

J. Ransdell Keene  
PO Box 3097  
Shreveport, LA 71133-3097

RE: James D. Reid

Dear Mr. Keene:

During the past several weeks, our office has been working cases related to Hurricanes Katrina and Rita, and have not had an opportunity to go to Shreveport and interview witnesses in the investigation of A. J. Mullen Memorial Hospital aka Samaritan Healthcare. Through information provided by Mr. Reid, the scope of our investigation has expanded to include Dr. Denny E. Gamble, Mr. Tommy "Tom" R. Reese, Oxford Management, the Cost Reports submitted for years 2000-2002, and the involvement of Dr. Gamble and Mr. Reese in the scheme of patient billing.

Mr. Reid has been in constant communication with Investigator Andrew LeJeune for the past several weeks in providing information, which includes a 12 page typed statement, along with attachments, on Dr. Gamble and Mr. Reese. According to Investigator LeJeune, Mr. Reid has been very cooperative in providing information which we believe will be very helpful to this investigation.

If you have any questions, please feel free to contact me at 225-326-6210.

Sincerely,

Ellison Travis  
Assistant Attorney General  
State of Louisiana  
Department of Justice  
Medicaid Fraud Control Unit  
P.O. Box 94005  
Baton Rouge, LA 70804-9005

KEENJLTR3AJL