

DISTRICT / COUNTY COURT
COUNTY OF DENVER
STATE OF COLORADO

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WARRANT

1. The affiant, Tammera Saavedra, Criminal Investigator with the Medicaid Fraud Control Unit (Mfcu) of the Colorado Attorney General's Office, a peace officer, being duly sworn upon oath, says that the facts stated herein are true.

2. I am a criminal investigator and commissioned peace officer employed by the Colorado Attorney General, assigned to the Medicaid Fraud Control Unit (Mfcu) Unit, Criminal Justice Section. I have been employed as a peace officer for over 7 years, most recently as an Attorney General Investigator, investigating complex crimes, and other violations of the Colorado Revised Statutes.

3. I have probable cause to believe that:

LATTANY, DE JANE REANIECE

[REDACTED]
[REDACTED]

described as an african american, female with black hair and brown eyes

has committed the offenses outlined in the attached Felony Complaint and Information. These offenses are:

COUNT ONE: Theft, C.R.S. 24-31-808 (1)(g), (3)(h), a Class 3 Felony

COUNT TWO: Cybercrime, C.R.S. 18-5.5-102(1)(d), a Class 3 Felony

COUNT THREE: False/Alter Destroy Documents, C.R.S. 24-31-808 (1),(g)(I), (4), a Class 5 Felony

COUNT FOUR: Attempt to Influence a Public Servant, C.R.S. 18-8-306, a Class 4 Felony

REASONS FOR MY BELIEF

Medicaid Background

Medicaid is a combined state and federal program that pays for essential medical care and services for the categorically needy (C.R.S. 25.5-1-101, et. seq.). It is funded by the state and federal governments and is administered by the Colorado Department of Health Care Policy and Financing (HCPF). The medical care and services are provided by private individuals, organizations, and companies, which are then reimbursed by the State of Colorado. HCPF has an internal division called Program Integrity (PI) that reviews potentially fraudulent activity in the Medicaid system.

C.R.S. 24-31-801 et seq. created within the Colorado Department of Law and under the control of the Office of the Attorney General in Colorado Medicaid Fraud Control Unit (COMFCU). Those statutes also tasked the COMFCU with the investigation and prosecution of fraud, misuse, waste, and abuse committed by Medicaid providers and with the investigation and prosecution of cases of patient abuse, neglect, and exploitation.

Section 1903(q) of the Social Security Act gives a state Medicaid Fraud Control Unit (MFCU) responsibility for the investigation and prosecution of all applicable state laws regarding any aspect of fraud in connection with the provision of medical assistance, and for reviewing and acting on any complaints regarding abuse and neglect of patients of health care facilities receiving payment under the federal medical assistance programs.

Under 10 Colo. Code Regs. § 2505-10:8.076.2.A et seq., the MFCU has the right to audit provider compliance, and the provider shall provide claims documents, including medical, claims documentation, and financial documents, to the MFCU upon request. Compliance monitoring includes site reviews and visits (Id. at §§ 2505-10:8.079.3.A and 8.076.2.C). Records verification includes interviews with providers, their employees, and other members of the provider's corporate structure, Id. at § § 2505-10: 8.130.2.H.

The Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule covers all identifiable information or personal health information (PHI) about a patient that is transferred to or maintained by a health care provider. In order to protect the privacy of medical information regarding individual Medicaid Clients referred to in this affidavit; I have identified the adult Medicaid Clients who received services with the moniker "AMC" along with an

individual number (i.e. AMC 1, AMC 2) to distinguish them. A separate key with the Medicaid clients specific identifying information will be maintained and made available to the court upon request and as appropriate during future legal proceedings.

In addition to the Medicaid Fraud Control Unit being exempt from HIPAA, it should also be noted that when providers enroll with the Medicaid program that they agree to provide access to patient files and records for oversight purposes. Likewise, when patients enroll in the Medicaid program, they also agree to the release of their information for such purposes. While there is a law enforcement component to the MFCUs, they have greater access to protected health information than traditional law enforcement.

COGNOS is a software tool used by HCPF and the MFCU to retrieve billing information submitted by providers. COGNOS is the term commonly used by the MFCU when referring to Medicaid / HCPF billing data and is used in this context in subsequent affidavit.

Case Summary:

Aggie's Angels Care Providers is a home healthcare services provider contracted to provide Personal Care Services to Medicaid clients. The principal administrative office is located at 1450 S. Havana St. Ste. 340, Aurora, Arapahoe County, Colorado, 80012. The company is owned and operated by DeJane Lattany.

A review of the company's billing patterns showed multiple instances where Lattany was billing out the full Prior Authorization Record (PAR) units of services available (PAR units equate to hundreds of man-hours of service, sufficient to cover anywhere from a 6-to-12-month timeframe of services). Lattany was billing out all of the PAR units for Medicaid clients within a matter of a couple of calendar days, a timeframe in which it is not possible to perform that quantity of service hours. Additionally, Lattany did not correct the over-billing issue and has no records to support the services billed for were ever provided.

During a phone interview, DeJane Lattany was asked about the overbilling issue and admitted to knowing about the impossible billings but claimed it was the error of her billing company, Affordable Professional Billing Services (APBS), and explained that she was trying to get them to correct the issue and return the funds. Through extensive investigation and research, it was determined that APBS did not exist at all. The information Lattany provided on the alleged billing company was fabricated in an effort to hinder the investigation.

A review of Aggies Angel's Care Providers client billing records showed that between November 9, 2019, through February 17, 2021, there were 319 claims paid, totaling \$526,293.89. Of those claims paid, a total of 21,876 clock hours, would have been impossible to physically perform in the timeframe billed for, resulting in an overpayment of \$372,150.47. Colorado Department of Health Care Policy and Financing (HCPF) where payments are processed, is located in Denver County, Colorado, therefore the theft occurred in Denver County.

Interviews with clients of Aggies Angel's Care Providers produced evidence that the services charged for were never provided, and that in light of this investigation, Lattany went to several of the previous clients' homes in an attempt to have them sign documentation attesting that they had received all of the service hours billed for. This effort is a contradiction of Lattany's explanation that a billing company error was the reason behind the overbilling. One client Lattany billed services for was not even a resident of Colorado at the time. Another client passed away on March 22, 2020, Lattany billed his entire year's PAR hours on February 20, 2020.

The calculated theft value after November 1, 2019, is \$372,150.47.

Probable Cause:

On April 18, 2019, the MFCU received a complaint from [REDACTED] Home Care. [REDACTED] had contacted Aggie's Angels Care Providers, and spoke to DeJane Lattany, due to excessive billing on a client named AMC 1. Aggie's Angels billed initially 800 units (200 clock hours) of personal care between May 29, 2018 and May 30, 2018. After Lattany was notified by [REDACTED] Home Care of the over-billing issue in February 2019, she revised the claim and only billed 430 units (107.5 clock hours) for the May 29, 2018 and May 30, 2018 timeframe. It is not possible to provide 107.5 clock hours of care into a 48-hour timeframe.

A second case referral was received from Sarah Geduldig with HCPF PI (Program Integrity) on October 30, 2020. The referral stated that Aggie's Angels Care Providers, which is owned and operated by DeJane Lattany, was billing out all of the available units of service, for Medicaid client AMC 2, within a short time of receiving the Prior Authorization Request (PAR). For AMC 2, the PAR certification period was October 1, 2019, through September 30, 2020, during which time the client was approved to receive 1,776 units (equivalent to 444 clock hours) of personal care services. Aggies Angel's Care Providers billed and received payment for all 1,776 units of Relative Personal Care hours from October 1, 2019 through October 9, 2019. It is not possible to perform 444 clock hours of services in a nine-day period. Given that all units on the PAR appear to have been billed within nine days of the start of the

certification period, and the hours billed could not be feasibly provided, the billing seemed suspicious.

Another referral was received from Sarah Geduldig with HCPF PI on December 2, 2020, in which Aggie's Angels Care Providers billed for 1,330 units of services for AMC 3 in an amount that exceeded 24-hours in a day.

The company's billing patterns show multiple instances of billing out the full PAR units of services available for Medicaid clients within a timeframe that is not possible to perform the quantity of service hours. Additionally, the company is not correcting the over-billing issue.

The case was assigned to me in December 2020, after previously being assigned to Investigator Terry Miles. I reviewed the intake report completed by Chief Investigator Bruce Norton and learned that the referral was sent over by HCPF for excessively billing the service units available for their Medicaid clients, within a timeframe that is impossible to perform the number of hours billed. Aggie's Angels Care Providers is owned by DeJane Lattany.

On November 5, 2020, Investigator Terry Miles sent a records request to Aggie's Angels Care Providers, asking for all billing information and Medicaid client records. Within 30 minutes of emailing that record's request, DeJane Lattany emailed Investigator Miles and requested additional time to produce the records due to COVID diagnosis for herself and her staff. Investigator Miles extended the request for 30 days. Lattany again emailed Investigator Miles on November 27, 2020, and asked for additional time to produce the records as she was still battling COVID. Investigator Miles granted her another extension, giving her until January 1, 2021, to provide the records.

On January 7, 2021, records from Aggie's Angels were received, however, the records did not include all of the information that was asked for, specifically provider timecards for the services billed to each client's Medicaid as well as billing company contact information.

On February 18, 2021, I was attempting to make contact with DeJane Lattany, at Aggie's Angels Care Providers address of record 1450 S. Havana St. Ste 320, Aurora, CO 80012. Upon arrival I noticed Ste. 320, had a note on the door that said due to Covid, the office would not be open daily. There was an abundance of what appeared to be billing sheets on the floor in front of the door, the door was locked, and no one answered my knocks. I placed my business card in the door jamb.

Once I got into the parking lot of the facility, I received a call from DeJane Lattany at phone number [REDACTED]. I was advised that she had spoken to

her secretary, who informed her that my business card was left in the office door. I asked if the secretary was present and Lattany said that she was not, she had only stopped by to grab some mail and had already left. I explained to Lattany that I did not get the information I needed in the records that she had sent over in January. I advised her that I needed to know who the billing company was, particularly a phone number and a name of the representative that they do business with and Lattany advised me that she did not have that information with her and that it was in a file at the office, but because of her reoccurring COVID diagnosis, she was unable to go to the office when the building was occupied. Lattany mentioned that it was the same billing company they had been using for a while, and that the billing company was housed at the same office complex that Aggies Angels was officing from. Lattany was instructed to provide me with the contact information for the billing company representative as well as a copy of the contract that was signed by Aggies Angels, with the billing company. Lattany assured me that she would work on getting that information to me in a reasonable timeframe.

Additionally, I asked Lattany to elaborate on a comment that she made in an email to investigator Miles regarding Aggies switching billing companies due to a "billing issue". Lattany explained that it had come to her attention that the billing company may be over billing for hours on some clients and that she was looking into the matter to see if any refunds were due, but she did not have any specific client names that the issue pertained to. Lattany reiterated that she had been experiencing COVID for several months and could not remember all the information. I did note that Lattany did not sound as if she had any respiratory issues during our conversation. Her voice was not hoarse, her breathing was not labored, and I did not hear any coughing from her in the several minutes that we spoke on the phone

In an email from February 23, 2021, Lattany admitted that there were instances where it was brought to her attention that the PAR units were being billed out in timeframes that were not feasible to perform the number of service hours charged for. Lattany claimed that it was a billing error made by her contracted billing provider, Affordable Professional Billing Services (APB Services), and she had requested that they refund Medicaid for the overbilled units, as she was not wanting to be portrayed as defrauding the Medicaid program. Lattany was asked to provide MFCU with the contact information and a copy of the contract she held with Affordable Professional Billing Services. Lattany provided MFCU with the contract she said she had signed with APBS as well as a G-mail email address and claimed it was the only contact she had for the billing company representative, Ivan Washington, whom she had dealt with when signing on with Affordable Professional Billing Services in 2015. I immediately noticed that the contract Lattany forwarded to me look haphazardly written and had numerous grammatical errors, and

formatting inconsistencies. The contract did not appear to be a professionally or legally developed document. I sent email correspondence to the aforementioned Gmail email address and no message read receipt, or reply was ever received. In that same email response, Lattany did admit that she was using one or two PARs to pay the bills and keep her business in operation, which contradicts her previous claim that she had instructed the billing company to reverse the over-billed units because she did not want to be complicit in defrauding the Medicaid program.

At the time, Ms. Lattany failed to provide us with any useable contact information for the billing provider she claims submitted the false billing invoices to Medicaid. A search of the Secretary of State website found no record of a company by the Affordable Professional Billing Services name, registered in Colorado nor was any such business entity registered in New York. The lack of identifiable or traceable business contacts coupled with the unprofessional appearing contract, yielded the conclusion the billing company was a rouse Lattany was creating to shift focus and blame for the overbilling.

All efforts to find the aforementioned business were unsuccessful. In a further attempt to identify and locate the billing company, I asked Sarah Guildling with HCPF if the Medicaid billing database had a way of tracking who submitted the claims. Sarah confirmed that the database could capture the login I.D. and I.P address of the provider submitting the claim. The computer I.P. address recorded for the latest Medicaid claims submitted for Aggies Angels Care Providers was obtained from HCPF. A search of the computer I.P address used to submit claims to the Medicaid billing system was linked to a local Colorado zip code, and not a New York City location.

On March 4, 2021, HCPF notified Lattany that due to a credible allegation of fraud, further Medicaid payments to Aggie's Angels Care Providers would be suspended, pending the outcome of the fraud investigation. Later that evening, Lattany responded to the notification about payment suspension in an email and copied me on it and Katy Grutkowski of HCPF. Lattany attached the notice of suspension to the email with a subject line of "*****IMMEDIATE ASSISTANCE*****." The email was addressed to and entirely new contact for the billing company and was sent to APBSSupport@protonmail.com. Efforts to get in contact with representatives at that email address were unsuccessful as well.

On June 18, 2021, I received an email from Thomas Hammond, regarding the investigation into DeJane Lattany and Aggie's Angels Care Providers. Mr. Hammond informed me that he was legal counsel for Lattany on the matter regarding HCPF suspension of payments.

Mr. Hammond asked what our offices needed in order to conclude our investigation and I informed him that his client needed to comply with the request for records and provide MFCU with all the information requested on her employees as well as the clients. I also informed Mr. Hammond of my desire to speak with Ms. Lattany regarding the billing company and the errors in billing that had occurred. Mr. Hammond agreed to get the records MFCU requested, from Lattany.

On August 9, 2021, I requested banking and financial information from Sarah Geduldig with HCPF PI (Program Integrity), to identify the bank accounts that Medicaid monies are deposited into, for Aggie's Angels Care Providers billings. Ms. Geduldig provided me with the account information of record for Aggie's Angels Care Providers. The information on file indicated that Aggie's Angels Care Providers holds an account at Citywide Banks. Subsequently, a Production of Record warrant was served to Citywide Banks on August 24, 2021.

On September 2, 2021, Thomas Hammond, legal counsel for Lattany, brought a letter of explanation and a blue SanDisk thumb drive to the Department of Law and left it for me. In his letter, Mr. Hammond explained that the information on the SanDisk was the documentation Lattany provided him in response to the request for records, and that he had only scanned the paper files into electronic .pdf format for convenience. I forwarded the thumb drive to the Department of Law's Information Technology department to extract the contents from the drive and place them in the investigative file. In review of the information from the drive, it was notated that none of the client files were complete and some even had handwritten notes that stated the file had been destroyed due to the client's death. Every file received lacked sufficient client care sheets recording dates and times of services performed, to substantiate the billing that occurred for each client. Most files did not contain any care sheets documenting the dates and times when employees provided services. The employment files for the staff of Aggie's Angels Care Providers were not produced either. Per Medicaid rule, the provider is legally obligated to retain all records for a minimum of seven years.

I received account information from Citywide Banks on November 04, 2021, the Account Agreement contained within the file identified that the account signers were DeJane Reaniece Lattany, [REDACTED]. Contained in the records was a copy of the Colorado driver license for DeJane Reaniece Lattany. Review revealed that several deposits were made to the account by State of Colorado HCClaimPmt. These deposits were compared against the payments made by the Colorado Health Care Policy and Financing (HCPF), and the amounts aligned, proving these were Medicaid fund payments.

There were also several transfers made to additional accounts within Citywide Banks, by the aforementioned account signers, but I was unable to find any payments or transfers from the account to APB Services or Affordable Professional Billing Services.

During the course of reviewing the banking information records, I noticed several wire transfers deposited into the checking account. I researched the wire information and identified the deposits as Paycheck Protection Program funds. In reviewing the rules associated with qualifying for a Paycheck Protection Program loan, I realized Aggie's Angels Care Providers would not be a company capable of meeting criteria for the amount of funds being received. I contacted the United States Secret Service and subsequently the Federal Bureau of Investigation regarding the PPP loan fraud I suspected. I was notified that the agency did have an active fraud investigation underway and that Lattany was recipient of several PPP loans totaling in excess of \$1 million dollars.

On February 3, 2022, I received a call from DeJane Lattany from phone number [REDACTED]. I was immediately informed of who she was and was told that she had one quick question to ask me. I said "okay," and Lattany immediately asked if I had "already put charges against her?" I told Lattany that I was unaware of any sort of legal filings against her from our office and asked her why she had that idea or understanding. Lattany was crying and explained that she was "putting her granddad in the ground" today and that she had told her attorney, Mr. Hammond to set up a meeting with me after she takes care of her family affairs, but he made it seem like charges were likely coming. I informed Lattany that we indeed needed to have that interview as soon as possible, so we could get to the bottom of the issues regarding the billing company she has claimed is responsible for all of the incorrect billing on behalf of Aggie's Angels. Lattany claimed that she is willing to answer any of our questions and would be happy to speak with me after she handles her family affairs.

On March 2, 2022, I began conducting field interviews of the clients Lattany billed services to. On the aforementioned date, I contacted AMC 3, at her address of record. According to COGNOS client billing data for Aggie's Angels Care Providers, AMC 3, was a client of Aggie's Angels Care Providers from May 2018 through October of 2020.

I informed AMC 3, that I was there to ask her questions regarding the services she received from Aggie's Angels Care Providers. AMC 3, acknowledged that she had been a client of Aggie's Angels and that her last caregiver was Zaporah. AMC 3 said she did not know any of the family of DeJane Lattany prior to receiving services and that she had picked Aggie's Angels Care Providers off of

a list of home health service providers given to her from Rocky Mountain Home Health.

AMC 3 informed me that just within the last few weeks, Zaporah had come to her home and had her sign a document verifying she was a client of Aggie's Angels Care Providers Care Providers. AMC 3 stated that according to Zaporah the forms were tax related documents for the business. I asked AMC 3 if she was provided a copy of the document and she said she was not and could not remember what the document said other than if she was a client or not.

I asked AMC 3 if Zaporah would have her sign care sheets for the services that were provided and AMC 3 confirmed that she did. AMC 3 stated that Zaporah would also call the Aggie's Angels Care Providers offices from AMC 3's phone to report when she arrived and when she departed from AMC 3's home. AMC 3 stated that for the times when Zaporah was at her home, the visit was not more than an hour or so each time, it was certainly not 24 continuous hours of care services.

AMC 3 stated that she only received services from Aggie's Angels Care Providers for a couple of months in 2020, and that after Covid shut down businesses in March of 2020, no one from Aggie's Angels ever returned to her home to provide her with services. AMC 3 stated that she was without a home health service provider for several months in 2020, until she signed on with her new provider, Shared Touch, in September of 2020. However, billing data shows that Aggie's Angels Care Providers billed a total of 3,318 units (829.5 clock hours) of Personal Care Services in the 17-day period from 10/1/2020 to 10/17/2020, when Ms. AMC 3 confirms she was not receiving services from Aggie's Angels Care Providers.

On March 2, 2022, I also contacted AMC 1, at his address of record. According to COGNOS client billing data for Aggie's Angels Care Providers, AMC 1 was a client of Aggie's Angels Care Providers from May 2018 through June of 2018 and again in September of 2020 through October of 2020, an entire year of services were billed during the September to October 2020 timeframe.

I informed AMC 1 that we were there to ask him questions regarding the services he received from Aggie's Angels Care Providers. AMC 1 said that he had been a client of Aggie's Angels and that his last caregiver was Zaporah. Prior to Zaporah, AMC 1's girlfriend, was providing his home health services. AMC 1 would not specify if the girlfriend lived with him during that time or not, but he did say he had to file domestic abuse charges on her and get a restraining order against her due to abuse. AMC 1 admitted to being [REDACTED] to DeJane Lattany. He stated he was her [REDACTED]

AMC 1 informed me that about two weeks prior (sometime after Valentine's Day 2022), Zaporah and DeJane had come to his home and had him sign a document verifying he was a client of Aggie's Angels Care Providers. AMC 1 stated that according to DeJane the forms were tax related documents for the business. I asked AMC 1 if he was provided a copy of the document and he said he was not and could not remember what the document said, he just signed it because DeJane told him to.

I asked AMC 1 if Zaporah or his girlfriend ever had him sign care sheets for the services they provided and AMC 1 confirmed that he believes they did. AMC 1 stated that Zaporah would also call the Aggie's Angels Care Providers offices from AMC 1's phone to report when she arrived and when she departed from AMC 1's home.

AMC 1 stated that he had only received services from Aggie's Angels Care Providers for short time in early 2020, and that by June of 2020 he had moved to Kansas. He stated he did not move back to Colorado until the end of October 2020. AMC 1 stated that he was without a home health service provider for several months, until he signed on with his current provider, Clinton Home Care, which was after his return to Colorado in October 2020. According to the COGNOS billing data, Aggies Angels billed the entire years' worth of service hours AMC 1 was provided by Medicaid, during a time he was not even a resident of Colorado.

In review of the Aggies Angel's bank records and client information received from Aggies Angel's attorney Mr. Hammond, I identified that AMC 4 was a client of Aggies Angel's and [REDACTED] was an employee of the business, residing at the same residence.

On March 2, 2022, I attempted to make contact with both individuals at their home address on record. Upon arrival an adult male exited the residence and informed me that his [REDACTED] AMC 4, were not at the residence at the time. I left him a business card and asked that his mother and brother give me a call.

Approximately ten minutes later, I received a call from AMC 4 at phone number [REDACTED]. I was advised that she had spoken to her son, who informed her that my business card was left at her home. AMC 4 asked me what the visit was in reference to and I told her that I was inquiring about the care she was provided from Aggies Angel's. AMC 4 confirmed that she had been a client of the business since it opened until it was closed due to Covid. AMC 4 stated that she was friends and previous neighbors with DeJane Lattany's [REDACTED]. According to AMC 4, DeJane would pay AMC 4's adult children to provide home health care services to AMC 4, in their home.

AMC 4 explained that her daughter, was her first caregiver, but that her daughter passed away and her son took over. AMC 4 stated that both her [REDACTED] both lived with her the entire time they were providing her home health care services. AMC 4 said that Aggies Angel's abruptly shut down with no explanation and that when [REDACTED] went to get his last check, he was later texted a copy of a letter that stated Aggies Angel's had gone into business with Emulsify Investments ltd., and all clients and employees would be receiving additional information about the partnership in the future. AMC 4 stated that she could never find any information online about Emulsify Investments ltd., and that the letter looked bogus. I asked AMC 4 if she still had a copy of that document and she stated that she did and would email it to me.

Additionally, I asked AMC 4 if her son [REDACTED] or her daughter provided care sheets and time slips to Aggies Angel's for their hours. AMC 4 confirmed that they did sign a care sheet to record their hours every day and they also logged into a database to record their services called Sandata. AMC 4 explained that Sandata was an App on the phone that was required by Medicaid to track services. I asked AMC 4 if she kept copies of any of the care sheets or time records for [REDACTED] or her daughter and she stated that she had not, because the original hard copies of the sheets had all been handed in to DeJane Lattany in person, until April 2021, at which time the timesheets had to be emailed due to the office being shut down. AMC 4 agreed to send me a copy of those care sheets that she had in her email.

AMC 4 informed me that in the last few weeks, Lattany had come to her home and had her sign a document verifying she was a client of Aggies Angel's Care Providers. AMC 4 stated that Lattany also had her son [REDACTED] to sign a form verifying he was an employee of the company. AMC 4 explained that Lattany told them the forms were tax related documents for the business. I asked AMC 4 if she could send me a copy of the form and she stated she was going to ask Lattany for a copy of it to forward to me. AMC 4 also mentioned that an attorney had called her around February of 2022 and asked her to provide a copy of her daughter's death certificate to him, for the company's employment records. AMC 4 stated that she sent the copy of the death certificate and employment verification to DeJane who forwarded it to the attorney. AMC 4 did not recall the attorney's name at the time.

AMC 4 acknowledged that now that she is receiving her home healthcare from another agency, she is aware that her children were not supposed to be providing her home healthcare while they lived with her. She stated that the new agency informed her of this Medicaid rule, when she had inquired about having her son provide her services.

Upon ending the call, I started to receive text messages from AMC 4. The messages included copies of care sheets from a portion of April 2021 and a copy of the Emulsify Investments Ltd. letter. AMC 4 also forwarded me copies of the two documents her and [REDACTED] signed for Lattany. AMC 4 stated in her text that Lattany would not send her copies of the actual forms that she and [REDACTED] signed but would only provide unsigned, blank copies of the documents. AMC 4 said that she repeatedly asked for copies of the forms she signed for Lattany and her calls and texts were going unanswered.

Upon review of the care sheets provided by AMC 4, it was documented that only 1.5 hours of care was being documented as being provided per day. It was clear upon review of the payroll checks issued by Lattany, that she only paid [REDACTED] for the 1.5 hours of documented care service per day he recorded providing AMC 4, and yet Lattany billed HCPF for hundreds of care hours for AMC 4, within a few calendar days of time.

In September 2022, I asked Department of Law forensic auditor Marina Mourzina to assist me in calculating the damages to the Medicaid program in this case. Marina pulled billing data from November 9, 2019, through October 1, 2022. There was a total of 319 claims paid, totaling \$526,293.89. Since it was not clear whether some of the care hours were provided for the billed dates, a full 24 hours of care credit was given, per calendar day that was billed. Therefore, only the hours in excess of 24 clock hours, were determined to be impossible billing (For example, if 100 clock hours were charged for a 1-day timeframe, then credit for 24 clock hours was given, and only 76 hours would be considered unsubstantiated billing). The calculations for all the identified dates of service resulted in a total of 21058.5 hours of impossible time billed for a total amount of \$372,150.47.

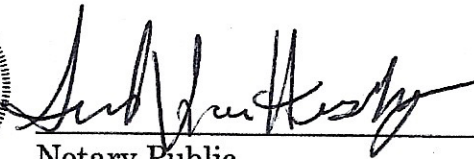
Based upon the above information, the affiant requests the court issue an arrest warrant for *Lattany, De Jane Reaniece*



Affiant

Subscribed and sworn before me this 31 day of Nov, 2022




Notary Public

My Commission expires

02/08/2025