

COMMONWEALTH OF  
PENNSYLVANIA  
COUNTY OF: Luzerne



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 11-1-01  
MDJ: Hon. Richard Cronauer  
Address: 100 Hazle Street  
Wilkes-Barre, Pennsylvania 18702  
Telephone: (570) 825-7373

DEFENDANT:

(NAME and ADDRESS):

Khall Rashid Rivera  
First Name Middle Name Last Name Gen.

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States ☐ Distance: \_\_\_\_\_  
☐ 2-Felony Ltd. ☐ 6-Felony Pend. Extradition Determ. ☐ D-Misdemeanor No Extradition  
☒ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending  
☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <b>CR-265-25</b>	Date Filed <b>06/17/2025</b>	OTN/LiveScan Number <b>E 101 3097-1</b>	Complaint Number <b>MF1230224130F</b>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB [REDACTED]	POB New York	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA					
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk/Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
EYE COLOR <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number			200	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				FL. HEIGHT (in.)	
Fingerprint Classification:				5' 7"	

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	/	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color			

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

Christopher R. Sherwood, SDAG  
(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

06/10/2025  
(Date)

I, Ryan S. King, Special Agent  
(Name of the Affiant)

[REDACTED]  
(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)  
do hereby state: (check appropriate box)

[REDACTED]  
(Police Agency ORI Number)

1. ☒ I accuse the above named defendant who lives at the address set forth above  
☐ I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have  
therefore designated as John Doe or Jane Doe  
with violating the penal laws of the Commonwealth of Pennsylvania at [REDACTED]  
[REDACTED] (Subdivision Code) [REDACTED] (Place-Political Subdivision)

In [REDACTED] County [ 40 ] on or about March 25, 2019 to August 15, 2022  
(County Code) (Offense Date)



**POLICE CRIMINAL COMPLAINT**

Docket Number: <b>12-265-25</b>	Date Filed: <b>06/17/ 2025</b>	OTN/LiveScan Number <b>E1013097-1</b>	Complaint Number <b>MFI230224130F</b>	Incident Number
Defendant Name	First: <b>Khalil</b>	Middle: <b>Rashid</b>	Last: <b>Rivera</b>	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	<b>1</b>	<b>1407</b>	<b>(A)(1)</b>	<b>of the</b>	<b>Title 62</b>	<b>1</b>	<b>F3</b>	<b>2699</b>	<b>26A</b>
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<b>PennDOT Data</b> (if applicable)	<b>Accident</b> Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): <b>MEDICAID FRAUD - SUBMISSION OF FALSE INFORMATION</b>									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally causing false or fraudulent claims to be submitted for furnishing services under Medical Assistance and/or knowingly submitting or causing to be submitted false information for the purpose of obtaining greater compensation than that to which he was legally entitled for furnishing services under Medical Assistance.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	<b>2</b>	<b>1407</b>	<b>(A)(4)</b>	<b>of the</b>	<b>Title 62</b>	<b>1</b>	<b>F3</b>	<b>2699</b>	<b>26A</b>
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<b>PennDOT Data</b> (if applicable)	<b>Accident</b> Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): <b>MEDICAID FRAUD - SERVICES NOT RENDERED</b>									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally submitting, or causing to be submitted, a claim for services which were not rendered to a recipient under the Medical Assistance Program.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	<b>3</b>	<b>1407</b>	<b>(A)(7)</b>	<b>of the</b>	<b>Title 62</b>	<b>1</b>	<b>F3</b>	<b>2699</b>	<b>26A</b>
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<b>PennDOT Data</b> (if applicable)	<b>Accident</b> Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): <b>MEDICAID FRAUD - MISREPRESENTATION</b>									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally submitting, or causing to be submitted, a claim which misrepresented the description of services provided; the dates of services, the identity of the recipient or the actual provider under the Medical Assistance Program.									



**POLICE CRIMINAL COMPLAINT**

Docket Number: <u>CL 2025-25</u>	Date Filed: <u>06/17/2025</u>	OTN/LiveScan Number <u>E1013097-1</u>	Complaint Number <u>MF1230224130F</u>	Incident Number
Defendant Name	First: <u>Khalil</u>	Middle: <u>Rashid</u>	Last: <u>Rivera</u>	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	<u>4</u>	<u>1407</u>	<u>(A)(9)</u>	<u>of the</u>	<u>Title 62</u>	<u>1</u>	<u>F3</u>	<u>2699</u>	<u>26A</u>
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>	<u>4</u>	<u>1407</u>	<u>(A)(9)</u>	<u>of the</u>	<u>Title 62</u>	<u>1</u>	<u>F3</u>	<u>2699</u>	<u>26A</u>
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): <b>MEDICAID FRAUD - SUBMIT A CLAIM FOR SERVICES NOT PROVIDED</b>									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally submitting, or causing to be submitted, a claim for services which were not rendered by a provider under the Medical Assistance Program.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	<u>5</u>	<u>3922</u>	<u>(A)(1)</u>	<u>of the</u>	<u>Title 18</u>	<u>1</u>	<u>F3</u>	<u>2399</u>	<u>26A</u>
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>	<u>5</u>	<u>3922</u>	<u>(A)(1)</u>	<u>of the</u>	<u>Title 18</u>	<u>1</u>	<u>F3</u>	<u>2399</u>	<u>26A</u>
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): <b>THEFT BY DECEPTION</b>									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally obtaining or withholding property of another by creating or reinforcing a false impression, including false impressions as to law, value, intention or other state of mind causing the theft of Medical Assistance funds of greater than \$2,000.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	<u>6</u>	<u>4911</u>	<u>(A)(1)</u>	<u>of the</u>	<u>Title 18</u>	<u>1</u>	<u>F3</u>	<u>2699</u>	<u>26A</u>
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>	<u>6</u>	<u>4911</u>	<u>(A)(1)</u>	<u>of the</u>	<u>Title 18</u>	<u>1</u>	<u>F3</u>	<u>2699</u>	<u>26A</u>
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): <b>TAMPERING WITH PUBLIC RECORDS OR INFORMATION</b>									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally making false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government.									





# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-2025-25</u>	Date Filed: <u>06/17/2025</u>	OTN/LiveScan Number <u>21013097-1</u>	Complaint Number <u>MF1230224130F</u>	Incident Number
Defendant Name	First: <u>Khalli</u>	Middle: <u>Rashid</u>	Last: <u>Rivera</u>	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	<u>7</u>	<u>4911</u>	<u>(A)(2)</u>	<u>of the</u>	<u>Title 18</u>	<u>1</u>	<u>F3</u>	<u>2699</u>	<u>26A</u>
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>	<u>7</u>	<u>4911</u>	<u>(A)(2)</u>	<u>of the</u>	<u>Title 18</u>	<u>1</u>	<u>F3</u>	<u>2699</u>	<u>26A</u>
PennDOT Data (If applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): <u>TAMPERING WITH PUBLIC RECORDS OR INFORMATION</u>									
Acts of the accused associated with this Offense: <u>One continuous count of making, presenting, or using any record, document or thing knowing it to be false, and with intent that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government.</u>									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>				<u>of the</u>					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>				<u>of the</u>					
PennDOT Data (If applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>				<u>of the</u>					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>				<u>of the</u>					
PennDOT Data (If applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									

# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-265-25</u>	Date Filed: <u>06/17/2025</u>	OTN/LiveScan Number <u>E 1013097-1</u>	Complaint Number <u>MF1230224130F</u>	Incident Number
Defendant Name	First: <u>Khalil</u>	Middle: <u>Rashid</u>	Last: <u>Rivera</u>	

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 4.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.  
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

June 10<sup>TH</sup> 2025  
(Date) (Year)

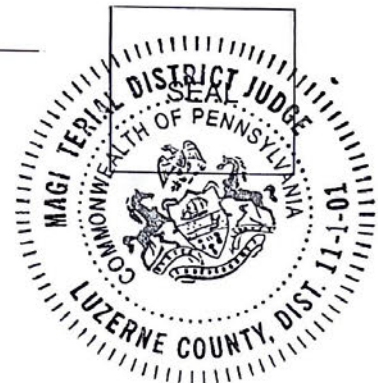
Ry. King  
(Signature of Affiant)

AND NOW, on this date 6-11-25 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

11-1-01  
(Magisterial District Court Number)

[Signature]  
(Issuing Authority)





**POLICE CRIMINAL COMPLAINT**

Docket Number: <b>CR-265-25</b>	Date Filed: <b>06/17/2025</b>	OTN/LiveScan Number <b>E1013097-1</b>	Complaint Number <b>MF1230224130F</b>	Incident Number
Defendant Name	First: <b>Khalil</b>	Middle: <b>Rashid</b>	Last: <b>Rivera</b>	

**AFFIDAVIT of PROBABLE CAUSE**

Your Affiant is Special Agent Ryan S. King, Pennsylvania Office of Attorney General (OAG), Bureau of Criminal Investigations, Medicaid Fraud Control Section, located in Harrisburg, Pennsylvania. Your Affiant is a law enforcement officer and as such, your Affiant is authorized to apply for, obtain and serve search warrants, make seizures and effectuate arrests. This Affidavit is based on an analysis of the documentation obtained during the course of the investigation, interview of the Defendant, and investigative work conducted by your Affiant.

In the course of his official duties, your Affiant has personally been involved in an investigation into Khalil R. Rivera (Rivera), a Blended Case Manager (BCM), formerly employed with Children's Service Center of Wyoming Valley (CSC).

On May 1, 2025, the 52nd Statewide Investigating Grand Jury issued Presentment No. 21 recommending that criminal charges be filed against Rivera for violations of the Crimes Code of Pennsylvania. The aforementioned Presentment was accepted by the Honorable Richard A. Lewis, Supervising Judge of the 52<sup>nd</sup> Statewide Investigating Grand Jury by Order dated May 1, 2025.

Having read and reviewed the Presentment, and having participated in this investigation and considering all the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this Affidavit of Probable Cause (A copy of the Presentment is attached hereto). Based upon my review of the testimony given before the Grand Jury and the documents produced for the Grand Jury, I believe that the testimony of the various witnesses is accurately summarized in the Presentment and that the records referred to in the Presentment are stated accurately.

Based upon my review of the evidence, your Affiant concludes that there is probable cause to believe that Khalil R. Rivera engaged in illegal activity which is accurately summarized in the attached Presentment. Your Affiant determines that there is probable cause to conclude that Khalil R. Rivera violated the following laws of the Commonwealth of Pennsylvania:

Medicaid Fraud, 62 P.S. §1407(a)(1),(4),(7),(9)

Theft by Deception, excess of \$2,000 but less than \$100,000, 18 Pa.C.S. §3922(a)(1)

Tampering with Public Records or Information, 18 Pa.C.S. §4911(a)(1),(2)



# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-265-25</u>	Date Filed: <u>06/17/2025</u>	OTN/LiveScan Number <u>E1013097-1</u>	Complaint Number <u>MF1230224130F</u>	Incident Number
Defendant Name	First: <u>Khalil</u>	Middle: <u>Rashid</u>	Last: <u>Rivera</u>	

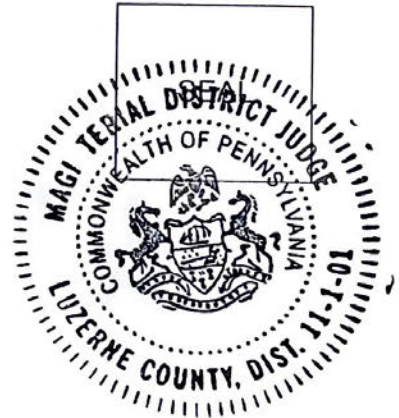
## AFFIDAVIT of PROBABLE CAUSE

I, Ryan S. King, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this 17 day of June 2025  
6-17-25 Date [Signature], Magisterial District Judge  
(Signature of Affiant) [Signature]

My commission expires the first Monday of January, 2030



CR - 265-25

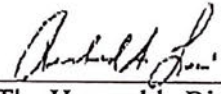
IN THE COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA

IN RE: : SUPREME COURT OF PENNSYLVANIA  
THE FIFTY-SECOND STATEWIDE : 69 M.D. MISC. DKT. 2023  
INVESTIGATING GRAND JURY :  
: DAUPHIN COUNTY COMMON PLEAS  
: CP-22-MD-979-2023  
: NOTICE NO. 47

**ORDER UNSEALING PRESENTMENT NO. 21 AND ORDER ACCEPTING  
PRESENTMENT NO. 21**

AND NOW, this 21st day of May 21, 2025, it is ORDERED that Presentment No. 21 and Order Accepting Presentment No. 21 are hereby unsealed so that the Commonwealth of Pennsylvania can utilize the Presentment in connection with the institution of criminal charges.

BY THE COURT:

  
\_\_\_\_\_  
The Honorable Richard A. Lewis  
Supervising Judge  
Fifty-Second Statewide Investigating Grand Jury



IN THE COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA

IN RE: : SUPREME COURT OF PENNSYLVANIA  
THE FIFTY-SECOND STATEWIDE : 69 M.D. MISC. DKT. 2023  
INVESTIGATING GRAND JURY : DAUPHIN COUNTY COMMON PLEAS  
: CP-22-MD-979-2023  
: NOTICE NO. 47


ORDER ACCEPTING PRESENTMENT NO. 21

1. The Court finds Presentment No. 21 of the Fifty-Second Statewide Investigating Grand Jury is within the authority of said Grand Jury and is in accordance with the provisions of the Investigating Grand Jury Act, 42 Pa.C.S. §§ 4541 *et seq.* Accordingly, this Presentment is accepted by the Court.

2. The County for conducting the trial of all charges pursuant to this Presentment shall be Luzerne County.

3. The Attorney General's Office of the Commonwealth of Pennsylvania is hereby authorized to prosecute as recommended in this Presentment by instituting appropriate criminal proceedings in the aforesaid county.

SO ORDERED this 15<sup>th</sup> day of May, 2025.

  
The Honorable Richard A. Lewis  
Supervising Judge  
Fifty-Second Statewide Investigating Grand Jury

IN THE COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA

IN RE: : SUPREME COURT OF PENNSYLVANIA  
: 69 M.D. MISC. DKT. 2023  
THE FIFTY-SECOND STATEWIDE :  
: DAUPHIN COUNTY COMMON PLEAS  
INVESTIGATING GRAND JURY : CP-22-MD-979-2023  
:  
: NOTICE NO. 47

TO THE HONORABLE RICHARD A. LEWIS, SUPERVISING JUDGE:

PRESENTMENT NO. 21

We, the Fifty-Second Statowide Investigating Grand Jury, duly charged to inquire into offenses against the criminal laws of the Commonwealth, have obtained knowledge of such matters from witnesses sworn by the Court and testifying before us. We find reasonable grounds to believe that various violations of the criminal laws have occurred. So finding with no fewer than twelve concurring, we do hereby make this Presentment to the Court.

[REDACTED]

For person  
The Fifty-Second Statewide Investigating Grand Jury

DATED: May 1, 2025.



## INTRODUCTION

We, the members of the Fifty-Second Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code occurring in and around Luzerne County, pursuant to Notice of Submission of Investigation No. 47, do hereby make the following findings of fact and recommendation of charges:

## FINDINGS OF FACT

The Grand Jury conducted an investigation into allegations that Khalil R. Rivera, a blended case manager ("BCM") with the Children's Service Center of Wyoming Valley ("CSC") located at 335 South Franklin Street in Wilkes-Barre, Luzerne County, committed Medicaid fraud and related offenses during the course of his employment between March 25, 2019 and August 15, 2022. The investigation revealed that Rivera fraudulently billed for providing services to his child clients when no such services were rendered. As a result, numerous child clients who suffered from mental or emotional illnesses did not receive the services that they needed. In total, Rivera submitted 1,289 fraudulent claims for reimbursement, and CSC received an excess of \$72,081.32 in Medicaid funds as a result.

Special Agent Ryan King ("SA King") of the Pennsylvania Office of Attorney General Medicaid Fraud Control Section testified that he was assigned to investigate allegations of Rivera's fraud that were submitted in a referral from Community Care Behavioral Health Organization ("CCBHO"), the managed care organization that processes and pays the claims submitted by CSC<sup>1</sup> for services provided to Medicaid recipients on behalf of the Department of Human Services. CCBHO had reported that it received a voluntary self-disclosure of billing concerns from CSC pertaining to Rivera on January 16, 2023. In the self-disclosure, CSC reported that it was made

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<sup>1</sup> CSC is a Medicaid provider, and Rivera's clients were Medical Assistance recipients.

aware that a client had not received services from Rivera in almost a year, despite documented encounters reflected in CSC's electronic medical record ("EMR"). CSC had conducted an internal investigation, using the CSC's employee identification badge system, the EMR, and, telephone questionnaires they completed after speaking with the guardian for each of Rivera's clients, which revealed that Rivera was billing for services not rendered to multiple clients. A comparison between Rivera's badge swipe log and his billing transactions in the EMR showed that he had billed for face-to-face contacts at clients' homes or in the community at times when he was in the office. CSC also found that many of Rivera's notes had a "copy and paste" presentation, in which he recorded the exact same progress note for multiple clients. There were encounter forms missing from the EMR for 217 billed encounters, as well as blank forms that were either signed by clients/guardians or dated with no signature.

The Grand Jury learned that blended case management is a service provided to individuals with mental illnesses or emotional disorders that connects them with appropriate support services needed for their care. Each client is assigned a BCM who is responsible for monitoring and advocating for services based upon the client's individualized needs. In order to bill Medicaid for services, a BCM is required to meet with the client, either in person or by phone, and document his/her progress and recommend additional services as needed. Rivera was assigned to 68 clients over the course of his employment with CSC. In order for CSC to receive Medicaid reimbursement for BCM services, a BCM is required to submit documentation to CSC of the services that were rendered. CSC, in turn, bills CCBHO. Once payment is approved, CSC is reimbursed by CCBHO with Medicaid funds. These funds are used by CSC to cover the costs of the services and to pay salaried employees, such as Rivera.



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Records were obtained from CSC, which included the BCM position description and performance standards, the billing expectations for BCMs, and the progress notes and encounter forms completed by Rivera. The Grand Jury learned that BCM encounters can occur face-to-face or via phone call, but must be documented by the BCM upon completion through notes and encounter forms. BCMs are required to enter and complete service document notes within three days of an encounter, in which they indicate the activity performed, whether the encounter was face-to-face or over phone call, the general purpose of the encounter, with whom the BCM interacted, and, progress notes regarding the client. Service document notes must be dated and identify a start and end time for the encounter. The encounter forms contain a log in which the BCM lists dates of service provided to the client in a given month, and the client or his/her parent/guardian then sign and date the form at the end of the month to verify that service was actually rendered on those dates. At the start of his/her employment, BCMs must read and sign a document acknowledging an understanding of the billing processes and procedures for the blended case management program. The document explains that billing must be done in 15-minute intervals and BCMs can only bill for encounters lasting eight minutes or longer. The document also states that CSC has a zero-tolerance policy on fraudulent billing. A copy of this document, which was signed by Rivera on March 29, 2019, was obtained during the course of the investigation.

As part of its internal investigation into Rivera, CSC's BCM supervisor conducted telephone questionnaires with seven families whose children were to receive services from Rivera. On July 18, 2022, the BCM supervisor spoke with the father of B.S., a client who began receiving services from Rivera in 2019 at age three. B.S.'s father stated that Rivera had not had contact with them since December 2021. He said that Rivera would present undated forms for the family to

sign, with Rivera explaining that he would just fill-in the dates on the forms at a later time. On April 26, 2024, SA King conducted another telephone questionnaire with B.S.'s father. In this call, B.S.'s father explained that when the family first began receiving services from Rivera, he would come to their home for upwards of an hour every other week. After a month or two, Rivera would only visit once a month. From 2020 to 2021, Rivera made shorter visits once per quarter. B.S.'s father told SA King that Rivera would bring a "stack" of five to six encounter forms for him to sign each time he visited, up until around Christmas 2021 when he stopped contacting the family entirely.

The Grand Jury was presented with service documents for B.S. that were recorded by Rivera. One service document for an alleged face-to-face visit in the client's home, dated May 10, 2022, contained the following progress note:

I came in today in order to do a Wellness visit on my families proceed to see if they needed any extra resources in order to help them they explained to me that they have a slight complaint with food and other various things I allow them to vent for quite some time once they were finished I preceded [sic] to give them the resources I think that would be appropriate to help them after quite some time I didn't ask how behaviors have been in the home they explain to me that they are up and down and sometimes they get out of control I proceeded to ask if they felt they needed more services in place and gave them options once they were done going over all the services available I had them signed [sic] the previous encounter form in order to keep the clients [sic] file up to date once we're done I preceded [sic] to schedule a follow up appointment in the next two weeks.

A service document from July 15, 2022, contained the exact same progress note with no variations. Despite the fact that he had not provided services to B.S. since Christmas 2021, Rivera submitted progress notes and billed for telephone and face-to-face services on 12 occasions from January 17, 2022 until June 15, 2022. Rivera documented three telephone encounters for a total of six units and nine face-to-face encounters for a total of 47 units.

CSC also conducted telephone questionnaires with a client, J.R., and J.R.'s mother. J.R. began receiving services from Rivera in 2019. In an initial questionnaire on July 18, 2022 and in



a follow-up questionnaire on August 3, 2022, J.R.'s mother reported that they had not seen Rivera since Christmas 2021. On August 4, 2022, the BCM supervisor spoke with J.R., who stated that Rivera came to his/her home the week prior and had J.R. sign encounter forms. In a telephone questionnaire with SA King, J.R.'s mother recalled that she did not sign encounter forms every time Rivera visited, but there were times when Rivera asked her to sign more than one encounter form, some of which were blank. She also confirmed that Rivera stopped providing services to the family around Christmas 2021. However, from January 7, 2022 to June 21, 2022, Rivera submitted progress notes and billed for face-to-face encounters with J.R. on 12 different occasions for a total of 78 units. Rivera also billed for at least eight telephone encounters before Christmas 2021 where he was either missing an encounter form or a progress note, or the documentation was incomplete.

CSC provides its employees with agency-issued cell phones for work-related communications, but they were also permitted to use their personal cell phones if they desired. If an employee chose to use their personal cell phone for work, CSC would reimburse them \$20 per month. According to documentation obtained from CSC regarding the agency's cell phone policy, Rivera opted out of the agency-issued cell phone and instead used his personal phone. In an interview with SA King on August 14, 2024, Rivera claimed that he only used his personal phone for services rendered via phone because the landline phones at CSC were outdated and difficult to use.

A record of all incoming and outgoing calls associated with Rivera's personal phone number from January 1, 2019 to December 31, 2022 was obtained. This record was compared with Rivera's billing transactions for all encounters occurring via telephone during his employment to determine when Rivera placed phone calls to his assigned 58 clients. This comparison revealed that Rivera documented 2,433 units of service for phone calls that he did not make, as there was

CP-265-25

no corresponding call in his phone records during the times he indicated in service documents. He also documented 563 units for calls that were under seven minutes and, therefore could not be billed, and 591 units that were overbilled in excess of the units of service actually rendered. In total, Rivera billed a total of 3,587 fraudulent units over 1,289 claims, for 54 of the 58 clients receiving telephone services, resulting in payment of \$72,081.32 in Medicaid funds to CSC.



### RECOMMENDATION OF CHARGES

Based upon the evidence that we have obtained and considered, which establishes a prima facie case, we, the members of the Fifty-Second Statewide Investigating Grand Jury, recommend that the Attorney General or his designee institute criminal proceedings against the person listed below and charge him with the following offenses:

#### KHALIL RIVERA

Medicaid Fraud, 62 P.S. §1407(a)(1),(4),(7),(9);

Theft by Deception, excess of \$2,000 but less than \$100,000, 18 Pa.C.S. §3922(a)(1); and

Tampering with Public Records or Information, 18 Pa.C.S. §4911(a)(1),(2)