

2025-CF-843

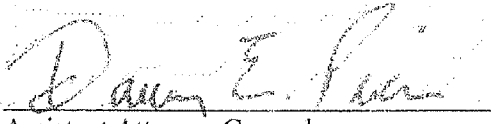
FILED

JUN 18 2025

for the County of

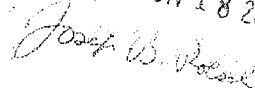
Committed the offense of **VENDOR FRAUD**, in that the defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, at least one of the acts having occurred after June 18th, 2022 and within the statute of limitations, knowingly willfully, by means of false statements and representations, submitted false Division of Rehabilitation Services, Home Services time sheets to the Division of Rehabilitation Services to obtain payments under the Public Aid Code to which she was not entitled, and based on said false Home Services time sheets the Division of Rehabilitation Services of the Illinois Department of Human Services authorized payments appropriated by Xeana Woods, said amount having an aggregate value of more than ten thousand dollars (\$10,000.00)

In violation of 305 ILCS 5/8A-3(a) and against the peace and dignity of the same People of the State of Illinois. A Class 1 Felony.


Assistant Attorney General

FILED

JUN 18 2025


Joseph W. Parn
Clerk of the
Circuit Court

62

2025-CF-843

Count II

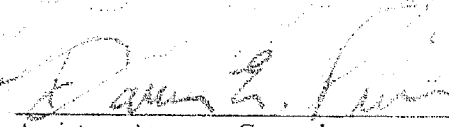
THE GRAND JURORS chosen, selected and sworn, in and for the County of Sangamon and the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, present that on or about January 26, 2022, through on or about December 28th, 2022, in the County of Sangamon, in the State of Illinois,

XEANA WOODS

DEFENDANT,

Committed the offense of **THEFT**, in that the defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, at least one of the acts having occurred after June 18th, 2022 and within the statute of limitations, knowingly exerted unauthorized control over governmental property of the State of Illinois, said property being United States Currency having a total value exceeding ten thousand dollars (\$10,000.00) and not exceeding one hundred thousand dollars (\$100,000.00), with the intent to permanently deprive the State of Illinois of the use or benefit of said property

In violation of 720 ILCS Section 5/16-1(a)(1)(A) and against the peace and dignity of the same people of Illinois. A Class 1 Felony.


Assistant Attorney General

FILED

JUN 18 2025

John B. Wood
Clerk of the Circuit Court

Count III


THE GRAND JURORS chosen, selected and sworn, in and for the County of Sangamon and the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, present that on or about January 26, 2022, through on or about December 28th, 2022, in the County of Sangamon, in the State of Illinois,

XEANA WOODS

DEFENDANT,

Committed the offense of **THEFT**, in that the defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, at least one of the acts having occurred after June 18th, 2022, and within the statute of limitations, knowingly obtained by deception, control over governmental property of the State of Illinois, said property being United States Currency having a total value exceeding ten thousand dollars (\$10,000.00) and not exceeding one hundred thousand dollars (\$100,000.00), in that the defendant submitted false time sheets to the Illinois Department of Human Services causing the Illinois Department of Human Services to authorize payments to the defendant, with the intent to permanently deprive the State of Illinois of the use or benefit of said property

In violation of 720 ILCS Section 5/16-1(a)(2)(A) and against the peace and dignity of the same people of Illinois. Class 1 Felony.


Assistant Attorney General

FILED

JUN 18 2025

Joseph B. Woodall
Clerk of the Circuit Court

2025-CF-843

Count IV

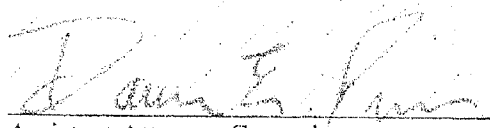
THE GRAND JURORS chosen, selected and sworn, in and for the County of Sangamon and the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, present that on or about January 26, 2022, through on or about December 28th, 2022, in the County of Sangamon, in the State of Illinois,

XEANA WOODS

DEFENDANT,

Committed the offense of **FORGERY**, in that the defendant, through a series of acts performed in furtherance of a single intention and design, with the intent to defraud, knowingly delivered false documents to the Illinois Department of Human Services, to wit: Home Services Time Sheets containing false entries for times and dates of services that were not rendered, knowing the documents had thus been made

In violation of 720 ILCS Section 5/17-3(a)(2) and against the peace and dignity of the same people of Illinois. Class 3 Felony.


Assistant Attorney General

FILED

JUN 18 2025

02
J. B. Votaw, Clerk of the
Circuit Court

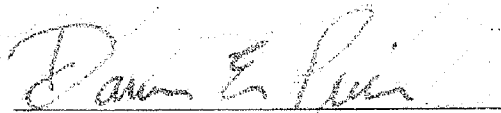
Count V

THE GRAND JURORS chosen, selected and sworn, in and for the County of Sangamon and the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, present that on or about January 26, 2022, through on or about December 28th, 2022, in the County of Sangamon, in the State of Illinois,

XEANA WOODS

DEFENDANT,

Committed the offense of **IDENTITY THEFT** in that said defendant, by a series of acts performed at different times in furtherance of a single intention and design, knowingly used personal identifying information or identification document of Teona Bates to fraudulently obtain credit, money, goods, services, or other property said property having a total value of more than ten thousand dollars (\$10,000), but not exceeding one hundred thousand (\$100,000) in violation of 720 ILCS 5/16-30(a). A Class 1 felony.


Assistant Attorney General

FILED

JUN 18 2025

Janet D. Reed
62
Clerk of the
Circuit Court

2025-CF-843

LIST OF WITNESSES

Justin Harris, Special Investigator, Office of the
Illinois Attorney General, Medicaid Fraud
Control Unit.

**IN THE CIRCUIT COURT
FOR THE SEVENTH JUDICIAL
CIRCUIT OF ILLINOIS**

Sangamon County, Springfield, Illinois
General Division

2025-843

THE PEOPLE

VS.

**XEANA WOODS
INDICTMENT FOR**

COUNT I-VENDOR FRAUD E/1
COUNT II- THEFT E/1
COUNT III- THEFT E/1
COUNT IV- FORGERY E/3
COUNT V-IDENTITY THEFT E/1

[Signature]

Foreperson of the Grand Jury

THE WITHIN Indictment returned in open
Court this 13 day of

JUNE, A. D., 2025

Bail set at \$ _____

Capias or Warrant of Arrest ordered.

NOT TO/TO (strike one) issue

[Signature]
Judge of the Circuit Court

FILED
JUN 18 2025

James W. [Signature]
Clerk of the Circuit Court