

STATE OF INDIANA )

IN THE ALLEN

COURT

) SS:

COUNTY OF ALLEN)

CAUSE NO. 02

STATE OF INDIANA

COUNT I

VS

TARA TIARA BROWN

**INFORMATION OF FRAUD**

**I.C. 35-43-5-4(a)(2)(C)**

**I.C. 35-43-5-4(b)(2)**

**A LEVEL 6 FELONY**

The Attorney General of the State of Indiana, by his Deputy Attorney General being duly sworn on his/her oath or having affirmed, informs that

Between August 28, 2023 and December 27, 2023 in Allen County, State of Indiana, Tara Tiara Brown did knowingly or intentionally cause to be presented a claim that contained a false or misleading statement or created a false or misleading impression to Home Is Where The Heart Is and BlueSky Homecare with the intent to obtain property worth at least seven hundred and fifty dollars (\$750.00) but less than fifty thousand dollars (\$50,000.00);

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-43-5-4(a)(4) and I.C. 35-43-5-4(b)(2) and against the peace and dignity of the State of Indiana.

/s/Georgeanna Teipen

Georgeanna Teipen

Deputy Attorney General

WITNESSES: Anyone listed in the police reports or body worn cameras, anyone involved in the chain of custody, anyone involved in the Defendant's arrest or book-in, anyone needed for rebuttal, anyone listed by the defense, anyone involved in the Defendant's prior arrests or convictions, any probation or parole officers (past or current), fingerprint expert, ISP Chemist, ISP Laboratory Analyst, jail call/tablet representative, digital forensic analyst,

Home Is Where The Heart Is

BlueSky Homecare

Tina Benson

Lewis Cliborne

[REDACTED]

Lucky Erenven

[REDACTED]

Babtunde Jegede

[REDACTED]

Rachelle Williams

STATE OF INDIANA )  
 ) SS:  
COUNTY OF ALLEN)

IN THE ALLEN  
CAUSE NO. 02

COURT

STATE OF INDIANA

COUNT II

VS

TARA TIARA BROWN

**INFORMATION OF THEFT**  
**I.C. 35-43-4-2(a)(1)**  
**A LEVEL 6 FELONY**

The Attorney General of the State of Indiana, by his Deputy Attorney General being duly sworn on his/her oath or having affirmed, informs that:

Between August 28, 2023 and December 27, 2023 in Allen County, State of Indiana, Tara Tiara Brown did knowingly or intentionally exert unauthorized control over the property of Home Is Where The Heart Is and BlueSky Homecare, to-wit: money with the intent to deprive Home is Where the Heart and BlueSky Homecare of any part of the use or value of the property, said property having a value of at least seven hundred fifty dollars and less than the value of fifty thousand dollars, to-wit: \$3,406.41;

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-43-4-2(a) and I.C. 35-43-4-2(a)(1)(A) and against the peace and dignity of the State of Indiana.

I affirm under the penalties of perjury that the foregoing representations are true to the best of my knowledge and belief.

/s/Georgeanna Teipen  
Georgeanna Teipen  
Deputy Attorney General

WITNESSES: Anyone listed in the police reports or body worn cameras, anyone involved in the chain of custody, anyone involved in the Defendant's arrest or book-in, anyone needed for rebuttal, anyone listed by the defense, anyone involved in the Defendant's prior arrests or convictions, any probation or parole officers (past or current), fingerprint expert, ISP Chemist, ISP Laboratory Analyst, jail call/tablet representative, digital forensic analyst,

Home Is Where The Heart Is

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Tina Benson

Lewis Cliborne

[REDACTED]

Luckv Erenven

[REDACTED]

Babtunde Jegede

[REDACTED]

Rachelle Williams

STATE OF INDIANA

IN THE ALLEN SUPERIOR COURT

SS:

COUNTY OF ALLEN

CAUSE NO: \_\_\_\_\_

STATE OF INDIANA

vs.

TARA TIARA BROWN

DOB/01-04-1982

**AFFIDAVIT FOR PROBABLE CAUSE**

I, Lewis T. Cliborne, Supervising Investigator for the Office of the Indiana Attorney General, Medicaid Fraud Control Unit ("MFCU"), have good cause to believe that between August 28, 2023, and December 27, 2023, in the County of Allen, State of Indiana, the above-named person knowingly and intentionally committed the following crime:

Fraud, I.C. 35-43-5-4(a)(4) and I.C. 35-43-5-4(b)(2), a Level 6 Felony

Theft, I.C. 35-43-4-2(a)(1), a Level 6 Felony

- 1) I am a Supervising Investigator employed by the Office of the Indiana Attorney General, MFCU, and have served with the agency since January 2018. I am a graduate of the Indiana Law Enforcement Academy and previously worked as a sworn law enforcement officer in various capacities for over 24 years. I am currently assigned to the Hobart Field Office where I am responsible for investigating, among other matters, healthcare fraud cases. I have received specialized training in the investigation of Medicaid fraud, healthcare fraud, theft, the diversion of controlled substances by medical practitioners, and related crimes.
- 2) Because this affidavit is being submitted for the purpose of securing an arrest warrant, I have not included every fact which has been revealed through the course of this investigation. Rather, I have set forth only the facts that are believed to be necessary to establish the required foundation for issuance of the requested warrant.
- 3) Medicaid is a federally assisted grant program for the States. Medicaid enables the States to provide medical assistance and related services to needy individuals. The Centers for Medicare and Medicaid Services is a component of the U.S. Department of Health and Human Services and administers Medicaid on a federal level. Within broad federal rules, however, each State decides who is eligible for Medicaid including what services are covered, payment levels for services, and administrative and operational procedures. The State directly pays the providers of Medicaid services with the State obtaining the federal share of the payment from the accounts drawn on funds of the United States Treasury. The federal share in Indiana is approximately two-thirds while the State share is one-third.
- 4) On or about February 7, 2025, the Office of the Indiana Attorney General, MFCU, received a

referral for possible healthcare fraud from the Federal Bureau of Investigation regarding a home health care service agency, Home Is Where The Heart Is (“HIWTHI”), located in Fort Wayne, Indiana.

- 5) Tara Tiara Brown (“Brown”) resides in Fort Wayne, Indiana. She is an in-home Personal Care Assistant (“PCA”) employee that receives compensation and is responsible for providing daily Medicaid funded personal care services for disabled Medicaid recipients in their residence based upon approved care plans. PCA service examples include assistance with bathing, mobility transfers, and meal preparation, among other things. According to records maintained by the State of Indiana, Department of Workforce Development, during the period of the alleged fraud, Brown was employed by Home Is Where The Heart Is (“HIWTHI”), BlueSky Homecare Services (“BHS”), and Helzberg Diamonds retail jewelry store in Fort Wayne, Indiana.
- 6) HIWTHI, 2478 Lake Avenue, Fort Wayne, Indiana 46805, is a non-skilled in-home care provider for the elderly, or disabled individuals with serious illness. HIWTHI is also an enrolled Indiana Medicaid provider. Brown began employment with HIWTHI as a PCA on or about August 14, 2023.
- 7) BHS, 1398 Shadeland Avenue, Suite 2210, Indianapolis, Indiana 46219, is a non-skilled in-home care provider for the elderly, or disabled individuals with serious illness. BHS is also an enrolled Indiana Medicaid provider. Brown began employment with BHS as a Program Director with additional PCA responsibilities on or about July 26, 2023.
- 8) J.D. and B.J. are disabled Medicaid recipients that purportedly received in-home services from Brown and her employer, BHS, through the Indiana PathWays for Aging Program (“IPAP”). IPAP is an Indiana Health Coverage Program for individuals who are aged 60 and older, are eligible for Medicaid, and meet blindness or disability criteria. The program makes it possible for individuals to get nursing facility level of care at home or in a community setting, while living independently and provides an alternative to nursing facility admission for individuals with a disability.
- 9) W.J. is Brown’s mother and purportedly received in-home services from Brown and her employer, HIWTHI, through the IPAP at their shared residence in Fort Wayne, Indiana.
- 10) In accordance with federal and state Electronic Visit Verification requirements, both HIWTHI and BHS utilize Sandata Technologies SANTRAX Electronic Daily Visit Sheets (“DVS”) to document services provided to patients. The DVS includes, among other items, the type of services performed, the individual receiving the service, the date and location of the service, the individual providing the service, and the time the service begins and ends. HIWTHI and BHS employees are issued individual identification numbers and passwords which are required to log into the application from their smartphone and/or tablet. Once submitted by HIWTHI and BHS employees, the DVS is used to determine employee compensation and for Indiana Medicaid claim reimbursement justification.
- 11) In response to subpoenas issued by the Office of the Indiana Attorney General, MFCU, I

examined a sampling of 21 suspected fraudulent electronic HIWTHI and BHS DVSs completed and electronically submitted by Brown for J.D., B.J., and W.J. dated between August 28, 2023, and December 27, 2023. As shown in the chart below, on all 21 reviewed DVSs, Brown was simultaneously clocked in with up to three separate companies in three different geographic locations throughout Allen County, Indiana at the same time. A review of submitted claims revealed that the Indiana Medicaid program reimbursed HIWTHI and BHS in the amount of **\$6,073.53**, and Brown was compensated by HIWTHI and BHS in the amount of **\$3,406.41** based on the fraudulent DVSs that she knowingly and intentionally submitted.

- 12) In response to a subpoena issued by the Office of the Indiana Attorney General, MFCU, I examined certified attendance records from Helzberg Diamonds retail jewelry store, 4201 Coldwater Road, Fort Wayne, Indiana 46805. As shown in the chart below, Brown was working at Helzberg Diamonds on November 15, 22, 24, and 27, 2023, and December 20, and 27, 2023, at the same time she was also clocked in with HIWTHI and BHS and purportedly providing in-home care services to J.D. and W.J. in Fort Wayne, Indiana.
- 13) I interviewed disabled Indiana Medicaid recipient, J.D. As shown in the chart below, while employed with BHS, Brown submitted eight DVSs for daily services rendered to J.D. from 9:00 AM to 6:00 PM dated, October 25 and 30, 2023, November 15, 22, 24, 27, 2023, and December 20 and 27, 2023. However, J.D. stated that they never heard of Brown, nor had they ever received any in-home services from Brown.
- 14) I interviewed disabled Indiana Medicaid recipient, B.J. As shown in the chart below, while employed with BHS, Brown submitted two DVSs for daily services rendered to B.J. from 7:00 AM to 7:00 PM on August 28, 2023, and from 10:00 AM to 6:00 PM on October 30, 2023. However, B.J. stated that they could not recall anyone named Brown ever providing any in-home services at their residence.

Date	Daily Submitted Timesheets	Patients / Company	Brown Paid	Medicaid Paid
8/28/2023	15.56 Hrs (7:59 AM - 11:55 PM)	W.J. (HIWTHI)	\$233.40	\$549.76
	12 Hrs (7 AM - 7 PM)	B.J. (BHS)	\$138	\$397.43
10/25/2023	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	\$178.62
	2 Hrs (6:00 AM - 8:00 AM)	W.J. (HIWTHI)	\$30	Combined Claim
	16 Hrs (7:58 AM - 11:58 PM)	W.J. (HIWTHI)	\$240	\$618.48
10/30/2023	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	\$151.18
	8 Hrs (10:00 AM - 6:00 PM)	B.J. (BHS)	\$92	\$492.95
	2 Hrs (6:00 AM - 8:00 AM)	W.J. (HIWTHI)	\$30	Combined Claim
	15.56 Hrs (8:02 AM - 11:58 PM)	W.J. (HIWTHI)	\$233.40	\$618.48
11/15/2023	17.59 Hrs (5:59 AM - 11:58 PM)	W.J. (HIWTHI)	\$263.85	\$670.02
	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	No Claim
	4.98 Hrs (12:00 PM - 4:59 PM)	Helzberg Diamonds FW	***	***
11/22/2023	17.58 Hrs (5:59 AM - 11:57 PM)	W.J. (HIWTHI)	\$263.70	\$532.58
	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	No Claim
	6.42 Hrs (11:35 AM - 6:00 PM)	Helzberg Diamonds FW	***	***
11/24/2023	17.55 Hrs (6:03 AM - 11:58 PM)	W.J. (HIWTHI)	\$263.25	\$360.78
	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	No Claim
	5.32 Hrs (10:50 AM - 4:09 PM)	Helzberg Diamonds FW	***	***
11/27/2023	17.59 Hrs (5:59 AM - 11:58 PM)	W.J. (HIWTHI)	\$263.85	\$352.19
	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	No Claim
	5.72 Hrs (3:01 PM - 8:45 PM)	Helzberg Diamonds FW	***	***
12/20/2023	17.23 Hrs (6:37 AM - 12:00 AM)	W.J. (HIWTHI)	\$258.45	\$773.10
	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	No Claim
	6.08 Hrs (3:20 PM - 9:25 PM)	Helzberg Diamonds FW	***	***
12/27/2023	17.59 Hrs (5:59 AM - 11:58 PM)	W.J. (HIWTHI)	\$263.85	\$377.96
	9 Hrs (9:00 AM - 6:00 PM)	J.D. (BHS)	\$104	No Claim
	8.78 Hrs (11:28 AM - 8:15 PM)	Helzberg Diamonds FW	***	***
	<b>**All Times EST**</b>		<b>\$3,406.41</b>	<b>\$6,073.53</b>

15) I interviewed Brown about electronically submitting overlapping timesheets on the same days, with multiple companies, while claiming to be providing Medicaid funded in-home care services to J.D., B.J., and W.J. and she admitted to the fraud saying, in part, “there were times that I did submit timesheets, uh, maybe I shouldn’t have put the time down. I was basically going off a schedule.”

16) On each of the submitted electronic HIWTHI and BHS DVSs, Brown fraudulently

misrepresented that on the reported dates and times, she rendered in-home services for Medicaid recipients J.D., B.J., and W.J., including, assisting patient with bathing, oral care, and dressing, among other things. However, Brown did not provide these services because all the DVS submissions were fraudulent as Brown was simultaneously clocked in with three different companies, in three different locations at the same time as the reported DVS dates and times.

Based on the information contained in this affidavit there is probable cause to believe that, Tara Tiara Brown, knowingly and intentionally, executed a scheme and artifice to defraud enrolled Indiana Medicaid providers, HIWTHI and BHS, and the Indiana Medicaid program, by electronically submitting at least 21 fraudulent DVSs dated between August 28, 2023, and December 27, 2023, to HIWTHI and BHS, and received payments she knew she was not entitled to for in-home care services she knew she never rendered to disabled Indiana Medicaid recipients, J.D., B.J., and W.J. These deliberate and fraudulent actions by Tara Tiara Brown caused HIWTHI and BHS to submit to the Indiana Medicaid program claims for reimbursement containing materially false information.

I swear, under the penalty for perjury as specified by, I.C. 35-44.1-2-1, that the foregoing information is true to the best of my knowledge and belief.



May 22, 2025

Lewis T. Cliborne  
Supervising Investigator  
Office of the Indiana Attorney General  
Medicaid Fraud Control Unit

Probable cause found. Arrest Warrant Issued.

☒ , Defendant ordered released on recognizance with a promise to appear. Defendant subject to any conditions listed in the attached Pretrial Supervision Order.

\_\_\_\_\_ Defendant to be held for initial bail hearing on \_\_\_\_\_ day of \_\_\_\_\_, 2025, at 1:00pm

\_\_\_\_\_ Defendant to be held for next available bail hearing after the warrant is served.

\_\_\_\_\_ Bond to be set in the amount of \_\_\_\_\_ corporate surety or \_\_\_\_\_ case. Defendant subject to any conditions listed in the attached Pretrial Supervision Order.

So found this \_\_\_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_\_ am/pm.

  
\_\_\_\_\_  
Judge, Allen Circuit/Superior Court

6/16/2025