

**STATE OF LOUISIANA : 19TH JUDICIAL DISTRICT COURT**

**VERSUS : PARISH OF EAST BATON ROUGE**

**DAYSHA LASHAWN SIMMONS : STATE OF LOUISIANA**

[REDACTED]

**LA ID:**

[REDACTED]

**AFFIDAVIT**

**BEFORE ME**, the undersigned Authority of the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, Special Agent Shahiem Grant, with the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, Baton Rouge, Louisiana, who, upon being duly sworn by me, deposes and says that DAYSHA LASHAWN SIMMONS of [REDACTED] did violate:

1 Count(s) of 14:70.1-- MEDICAID FRAUD-- (Felony)

between the dates of 11-03-2023, through and including 06-07-2024, in the Parish of East Baton Rouge, State of Louisiana, in that DAYSHA LASHAWN SIMMONS intentionally defrauded Louisiana's Medicaid Program by presenting for allowance or payment, or causing the presentation for allowance or payment of false or fraudulent claims for furnishing services.

**OVERVIEW OF THE LOUISIANA MEDICAID PROGRAM**

A brief explanation of how the Medicaid Program operates is helpful in understanding the fraud perpetrated by DAYSHA LASHAWN SIMMONS, against the State of Louisiana. The Louisiana Department of Health (hereinafter, "LDH") is statutorily authorized to enter into contracts called "provider agreements" with entities who provide medical or medically-related services. Following the execution of such provider agreements, these entities are certified as eligible Medicaid "providers." Through this provider agreement mechanism, providers are

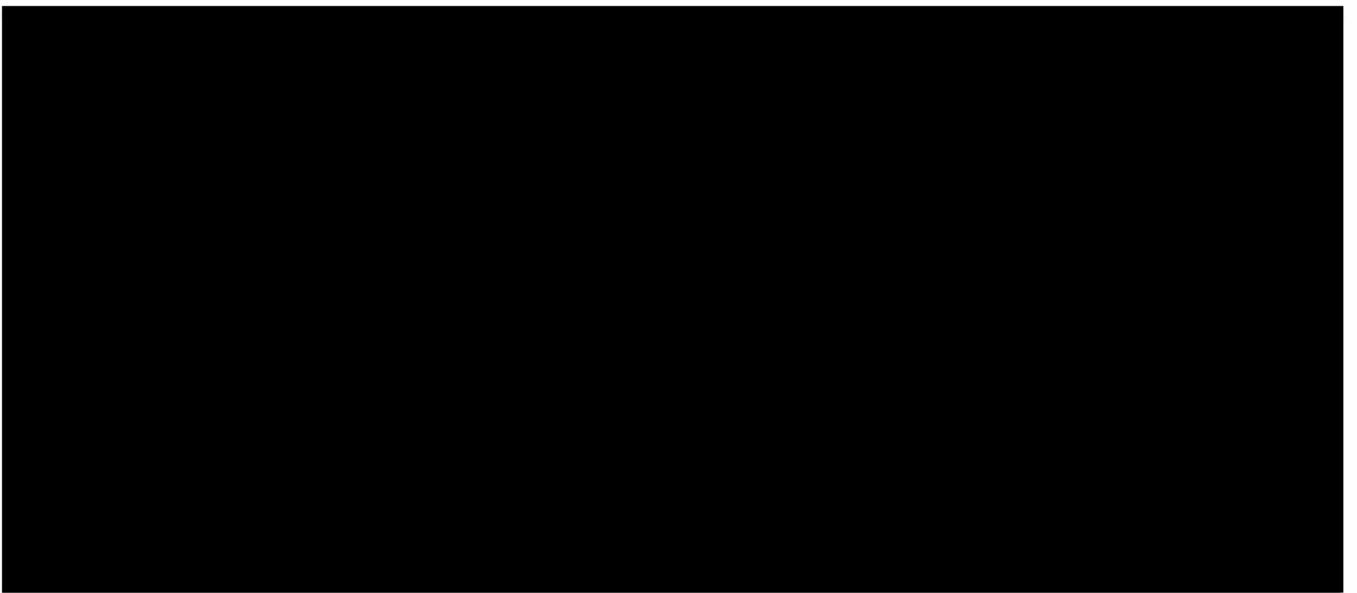
reimbursed by LDH for services rendered to Medicaid Recipients. Reimbursement is made to a provider in accordance with the rates that are established by LDH.

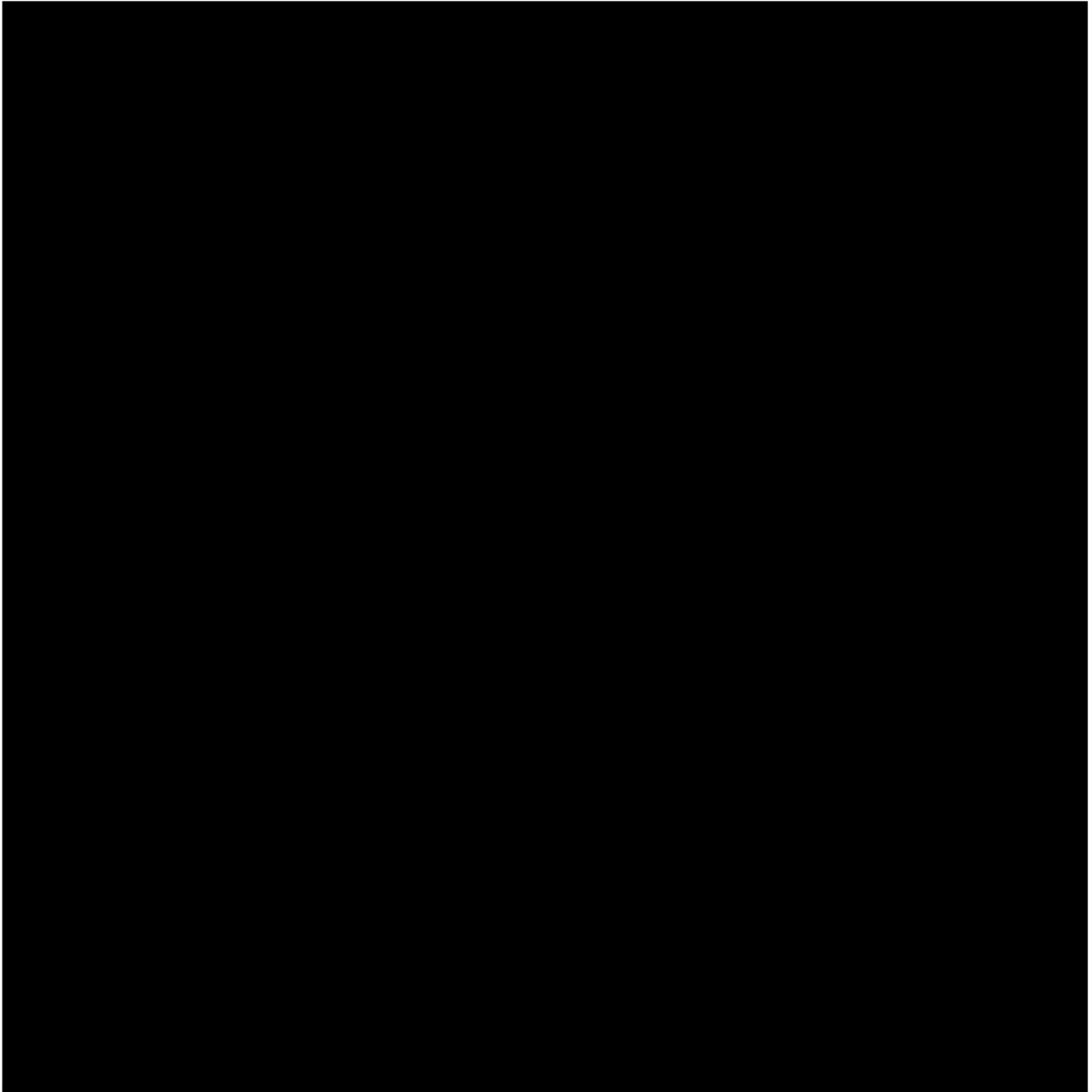
Every claim submitted on part of a provider discloses the recipient identification number and name of the Medicaid recipient receiving the services, address of the Medicaid recipient, description of the service provided, amount billed for each service, and date of service. These claims are all presented and submitted by the providers to Gainwell Technologies (formerly known as DXC Technology) (hereinafter "Gainwell"), the fiscal intermediary for the State of Louisiana's Medicaid System. Gainwell Technologies receives and processes all Medicaid billings at its office located in East Baton Rouge Parish and subsequently remits payment to the providers.

The Medicaid Program has a Long Term Personal Care Service Program (hereinafter, "LTPCS") that is administered by LDH. LTPCS is assistance rendered to a disable person with functional impairments by a caregiver employed by a licensed LTPCS agency and consists of performing tasks necessary to the disabled person's well-being and daily living activities.

Additionally, in the fall of 2016, LDH made available an Electronic Visit Verification (EVV) system for providers to train their DSW and start utilizing it for in home services verification in conjunction with the existing prior authorization data contract with Statistical Resources, Inc. (SRI). Through either a smart phone or electronic tablet, the EVV system utilizes GPS to pin point when a caregiver arrives at and leaves a specific location, such as the client's home. The EVV system also details the name of the individual providing the service, type of service and individual receiving the service.

Subject committed Medicaid fraud by not rendering services to the recipient.

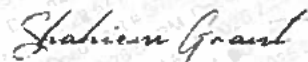




The above facts support the charge of one count of Medicaid Fraud as defined in La R.S. 14:70.1.

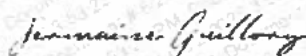
Probable cause has been shown that on 11-03-2023, through and including 06-07-2024, DAYSHA LASHAWN SIMMONS committed Medicaid fraud.

**THEREFORE**, for the above stated reasons, Affiant prays for the issuance of a Warrant of Arrest for DAYSHA LASHAWN SIMMONS

A handwritten signature in cursive script, reading "Shahiem Grant", written in black ink on a light-colored background.

Special Agent Shahiem Grant  
Affiant

THUS DONE AND PASSED on the 02 day of June, 2025.

A handwritten signature in cursive script, reading "Jermaine Guillory", written in black ink on a light-colored background.

**Jermaine Guillory**  
State of Louisiana