

STATE OF MISSOURI,
Plaintiff

vs.

IVORIE CHAMBERS,

DOB:
SSN:
Defendant

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FELONY COMPLAINT

COUNT: I

Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Ivorie Chambers, in violation of Section 191.905 RSMo, committed the class D felony of False Statement to Receive a Health Care Payment: to knowingly make or cause to be made a false statement or false representation of a material fact in order to receive a health care payment, punishable upon conviction under Sections 558.011, 588.002, and 191.905 RSMo, in that: on or about July 1, 2022, through August 1, 2022, in the County of Cole, State of Missouri, the defendant, a Personal Care Attendant (PCA) and owner of Consumer Directed Services (CDS) company, Healing Hands Home Care and Counseling Services, LLC (Healing Hands), a vendor in the Missouri Medicaid CDS program, was a health care provider who knowingly caused false representations to be made to the Missouri Medicaid Program (MO HealthNet), a health care payer, for the purpose of receiving health care payments, to wit: that defendant was providing in-home personal care services to Medicaid recipient E.J., as indicated by 14 separate Electronic Visit Verification (EVV) time records defendant manually entered and submitted via her CDS company, Healing Hands, as the basis for billing Medicaid from July 8, 2022, to August 10, 2022, all of which were false representations of material fact known by the defendant to be false when made, as Medicaid recipient E.J. died on April 7, 2022. The dates of service

fraudulently claimed by defendant occurred between July 1, 2022, through August 1, 2022. For a detailed listing of all false claims, see Attachment 1 to the Probable Cause Statement. Medicaid relied on and paid for all false claims from July 8, 2022, to August 12, 2022. The total loss to Missouri Medicaid for this scheme is \$782.40.

COUNT: II

Charge Code: 570.030-035Y202023.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Ivorie Chambers, in violation of Section 570.030 RSMo, committed the class D felony of Stealing by Deceit: to appropriate property or services of another with the purpose to deprive him or her thereof, either without his or her consent or by means of deceit or coercion, punishable upon conviction under Section 558.011 and 558.002 RSMo, in that: between November 12, 2021, through July 22, 2022, in the County of Cole, State of Missouri, the defendant stole Missouri Medicaid money from MO HealthNet by deceit. Specifically, defendant made false representations to MO HealthNet when defendant knew such representations were false, causing MO HealthNet to rely upon the false representations and thereby inducing MO HealthNet to part with payments that defendant then took, intending to withhold such payments from MO HealthNet permanently, and the payments had a combined value of at least seven hundred and fifty dollars (\$750.00).

RANGES OF PUNISHMENT

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

The range of punishment for violating Section 191.905 shall be a civil penalty of not less than five thousand dollars (\$5,000) and not more than ten thousand dollars (\$10,000) for each separate act in violation of Section 191.905(1)—(3), plus three times the amount of damages which the state and federal government sustained because of the act of that person. ...

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wm. Locke Thompson #68437
Prosecuting Attorney

Case Assigned to:

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Received and filed this _____ day of _____, 2025, and bail is set at _____.

Circuit Judge

SO ORDERED.