

## IN THE CIRCUIT OF COLE COUNTY, MISSOURI

STATE OF MISSOURI,	)	
	)	
	)	
Plaintiff	)	
	)	
vs.	)	No:
	)	OCN:
	)	
JESSIE LIGGINS	)	
	)	
	)	
	)	
DOB:	)	
SSN:	)	
	)	
Defendant	)	

FELONY COMPLAINTCOUNT: I

Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Jessie Liggins, in violation of Section 191.905.1 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 191.905.12, RSMo, in that: between on or about July 1, 2022, and October 31, 2022, in the County of Cole, State of Missouri, the defendant was a health care provider who collaborated with personal care attendant (PCA), Bertina Burris-Liggins, to cause false representations to be made to MO HealthNet, for the purpose of receiving health care payments, to wit: defendant fraudulently enrolled recipients W.B. and V.B. in the Consumer Directed Services (CDS) program with Bertina Burris-Liggins as their PCA, and Bertina provided in-home personal care services to W.B. and V.B. as indicated by 316 separate Electronic Visit Verification (EVV) time records submitted from defendant's phone to Aging in Your Place, LLC as the basis for billing Medicaid from July 8, 2022, to November 4, 2022, all of which were false

representations of material fact known by the defendant to be false when made as defendant knew that W.B. and V.B. did not need services and knew that services were not being provided to W.B. or V.B. The dates of services fraudulently claimed by defendant occurred between July 1, 2022, and October 31, 2022. Medicaid relied on and paid for all false claims on July 8, 2022, through November 11, 2022. The full specified claims with dates of service, dates billed, and paid dates are attached to the Probable Cause Statement as Attachment 1. The total loss to Missouri Medicaid for this scheme is \$16,869.65.

### COUNT: II

Charge Code: 570.030-034Y202323.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Jessie Liggins, in violation of Section 570.030 RSMo, committed the class C 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 March 26, 2021, and November 11, 2022, in the County of Cole, State of Missouri, the defendant stole Missouri Medicaid money from MO HealthNet by deceit. Specifically, defendant collaborated with Bertina Burris-Liggins to make 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 \$25,000.

### RANGES OF PUNISHMENT

The range of punishment for a class C felony conviction is imprisonment in the custody of the Missouri Department of Corrections for a term of not less than three (3) years but not to exceed ten (10) years; and up to a ten thousand dollar (\$10,000) fine, or twice the amount of the offender's financial gain.

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. ...

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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.