

IN THE CIRCUIT OF COLE COUNTY, MISSOURI

STATE OF MISSOURI,)	
)	
)	
vs.)	No:
)	OCN:
)	
JOYCE JACOX)	
)	
)	
)	
DOB:)	
SSN:)	
)	
)	
)	

FELONY COMPLAINTCOUNT: I

Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Joyce Jacox, 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 June 6, 2022, and September 21, 2022, in the County of Cole, State of Missouri, the defendant, as the consumer and employer in the Consumer-Directed Services (CDS) program, was a health care provider who knowingly collaborated with her attendant, A.L., to cause false representations to be made to MO HealthNet, a health care payer, for the purpose of receiving health care payments, to wit: that A.L. was providing in-home personal care services to the defendant, as indicated by Electronic Visit Verification (EVV) time records defendant submitted to Emerest Health CDS (Emerest) for one hundred seven (107) dates of service, which were in turn used by Emerest as the basis for billing for Medicaid from June 17, 2022, to September 30, 2022, all of which were

false representations of material fact known by the defendant to be false when made, as A.L. was recruited by the defendant to be her “stand by PCA” and never provided services to defendant and A.L. was working elsewhere during multiple dates of services. The dates of services fraudulently claimed by defendant occurred between June 6, 2022, and September 21, 2022. Medicaid relied on and paid for all false claims on June 24, 2022, through October 7, 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 \$8,058.27.

COUNT: II

Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Joyce Jacox, 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 October 30, 2022, and June 24, 2024, in the County of Cole, State of Missouri, the defendant, as the consumer and employer in the Consumer-Directed Services (CDS) program, was a health care provider who knowingly collaborated with her attendant, Laila Pruitt, to cause false representations to be made to MO HealthNet, a health care payer, for the purpose of receiving health care payments, to wit: that Laila Pruitt was providing in-home personal care services to the defendant, as indicated by Electronic Visit Verification (EVV) time records defendant submitted to Emerest Health CDS (Emerest) for two hundred forty (240) dates of service, which were in turn used by Emerest as the basis for billing for Medicaid from November 10, 2022, to July 5, 2024, all of which were false representations of material fact known by the defendant to be false when made, as Laila Pruitt was recruited by the defendant to be her “stand by PCA” and never provided services to defendant and Laila was working elsewhere during multiple dates of services. The dates of services fraudulently claimed by

defendant occurred between October 30, 2022, and June 24, 2024. Medicaid relied on and paid for all false claims on November 11, 2022, through July 12, 2024. The full specified claims with dates of service, dates billed, and paid dates are attached to the probable cause statement as Attachment 2. The total loss to Missouri Medicaid for this scheme is \$19,652.00.

COUNT: III

Charge Code: 570.030-035Y202023.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Joyce Jacox, 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 June 24, 2022, and October 7, 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 fifty (\$750.00).

COUNT: IV

Charge Code: 570.030-035Y202023.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Joyce Jacox, 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 11, 2022, and July 12, 2024, 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 fifty (\$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.



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Case Assigned to:

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

Circuit Judge

SO ORDERED.