

IN THE CIRCUIT OF COLE COUNTY, MISSOURI

STATE OF MISSOURI,)	
)	
)	
vs.)	No:
)	OCN:
)	
KENDALL L. MORRIS)	
)	
)	
)	
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 Kendall L. Morris, in violation of Section 191.905.1 RSMo, committed the class D felony of Medicaid Fraud: 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 October 10, 2023, in the County of Cole, State of Missouri, the defendant 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: defendant represented that he was providing direct support services to Medicaid recipient J.U. in J.U.'s home and surrounding area on October 10, 2023 through the Missouri Medicaid vendor company Crossroads ISL, LLC ("Crossroads") on October 10, 2023, as indicated by the service notes defendant submitted to Crossroads for October 10, 2023, which contained numerous false representations of material fact known by the defendant to

be false when made, as defendant was abusing J.U. in Memphis, TN, and/or was the defendant was arrested and placed in custody during the times of services. Contrary to the service notes defendant submitted, the defendant did not watch J.U. swing on his swing after lunch, nor did the defendant take J.U. on an outing to Cape Girardeau on October 10, 2023. The date of service fraudulently claimed by defendant occurred on or about October 10, 2023, and the service notes defendant submitted to Crossroads for this date of service were in turn used by each company as the basis for billing Medicaid on 11/6/2023. Defendant was paid by Medicaid on 11/10/2023. The total loss to Missouri Medicaid is \$2,071.58.

COUNT: II

Charge Code: 570.030-035Y202023.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Kendall L. Morris, in violation 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 Sections 558.011 and 558.002 RSMo, in that: between October 10, 2023 and November 10, 2023, in the County of Cole, State of Missouri, the defendant obtained payments from MO HealthNet by deceit in making 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 the 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 the 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.