

IN THE CIRCUIT OF COLE COUNTY, MISSOURI

STATE OF MISSOURI,)	
)	
)	
vs.)	No:
)	OCN:
)	
RHONDA JOHNSTON,)	
)	
)	
)	
)	
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 Rhonda Johnston, 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 October 31, 2022, in the County of Cole, State of Missouri, the defendant, as the owner of vendor company, Aging in Your Place, LLC, in the Missouri Medicaid Consumer Directed Services (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 attendant Bertina Burris was providing in-home personal care services to Medicaid recipients W.B. and V.B. as indicated by 316 separate Electronic Visit Verification (EVV) time records that Bertina Burris submitted to defendant and her company, Aging in Your Place. Defendant and Aging in Your Place used the EVV clock-ins 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 recklessly disregarded the truth or falsity of Bertina Burris' time

records, and defendant recklessly disregarded her mandatory duties as a Medicaid vendor to ensure recipients W.B. and V.B. received the quality and quantity of services they required. The dates of service fraudulently claimed by defendant occurred between July 1, 2022, and October 31, 2022. For a detailed listing of all false claims, see Attachments 1 and 2 to the Criminal Complaint. Medicaid relied on and paid for all false claims from July 8, 2022, to November 11, 2022. The total loss to Missouri Medicaid for this scheme is \$16,869.65.

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.