

IN THE CIRCUIT OF COLE COUNTY, MISSOURI

STATE OF MISSOURI,)	
)	
)	
Plaintiff)	
)	
vs.)	No:
)	OCN:
)	
SHEILA HALE)	
)	
)	
)	
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 Sheila Hale, 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 April 25, 2022, and March 15, 2023, in the County of Cole, State of Missouri, the defendant, as the biller and Chief Financial Officer of Bridgeway Clinics, LLC (Bridgeway), and as a purported licensed professional mental health provider, was a health care provider who knowingly collaborated with Randy Hale 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 R.T., J.L., and M.S. were providing behavioral health services at Bridgeway for 451 dates of service, which were in turn submitted by defendant and Randy Hale at Bridgeway as the basis for billing for Medicaid from August 25, 2022, to April 10, 2024, all of which were false representations of material fact known by

the defendant to be false when made, as R.T., L.J., and M.S. never provided behavioral health services to Medicaid recipients at Bridgeway, and because defendant and Randy Hale were the ones in fact purporting to provide behavioral health services. The dates of services fraudulently claimed by defendant occurred between August 25, 2022, and April 10, 2024. Medicaid relied on and paid for all false claims on October 7, 2022, through April 12, 2024. The full specified claims with dates of services, dates billed, and paid dates are attached to the probable cause statement as attachments 1, 2, and 3. The total loss to Missouri Medicaid for this scheme is \$55,115.08.

COUNT: II

Charge Code: 570.223-002Y202699.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Sheila Hale, in violation of Section 570.223 RSMo, committed the class C felony of identity theft, punishable upon conviction under Sections 558.011 and 558.002 RSMo, in that: on or about August 25, 2022, through April 10, 2024, in Cole County, State of Missouri, the defendant knowingly, with the intent to deceive or defraud, used R.T.'s, J.L.'s, and M.S.'s stolen Provider Identification Numbers, a means of identification, not lawfully issued for defendant's use and that resulted in the theft of \$55,115.05.

COUNT: III

Charge Code: 570.030-034Y202323.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Sheila Hale, 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 October 7, 2022, and April 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 \$25,000.00.

RANGES OF PUNISHMENT

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000.00); 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 (\$20,000.00).

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 (\$20,000.00).

The range of punishment for violating Section 191.905 shall be a civil penalty of not less than five thousand dollars (\$5,000.00) and not more than ten thousand dollars (\$10,000.00) 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. ...

Wm. Locke Thompson #68437
Prosecuting Attorney

Case Assigned to:

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