

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE TWENTY-FOURTH JUDICIAL CIRCUIT
WASHINGTON COUNTY

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff,

v.

JESSE L. KEMPFER,

Defendant.

No. 2026-CF-

53

FILED

JUN 16 2026

Andrea Runkel
Clerk of Circuit Court
Washington County Illinois

INFORMATION

Now come the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, and inform the Court that:

Count I of IV: On or about August 30, 2023, to on or about April 16, 2025, in Washington County, Illinois, Jesse L. Kempfer (hereinafter called "Defendant") committed the offense of **Managed Health Care Fraud**, in violation of 305 ILCS 5/8A-13(b)(1), in that Defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, knowingly executed or conspired to execute a scheme or artifice to defraud Molina Healthcare, a state or federally funded or mandated health plan, in connection with the delivery of or payment for health care services, being gas mileage reimbursement for medical visits, causing said health plan to authorize payments under the Illinois Public Aid Code to Defendant through Medical Transportation Management (MTM, Inc.), which Defendant was not entitled, or in a greater amount than Defendant was entitled, having a total value of ten thousand dollars (\$10,000.00) or more. **Class 1 Felony.**

Count II of IV: On or about August 30, 2023, to on or about April 16, 2025, in Washington County, Illinois, Jesse L. Kempfer (hereinafter called "Defendant") committed the offense of **Theft**, in violation of 720 ILCS 5/16-1(a)(1)(A) in that Defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, knowingly exerted unauthorized control over governmental property of the State of Illinois, said property being United States currency having a total value exceeding ten thousand dollars (\$10,000.00) and not exceeding one hundred thousand dollars (\$100,000.00), with the intent to permanently deprive the State of Illinois of the use or benefit of said property. **Class 1 Felony.**

Count III of IV: On or about August 30, 2023, to on or about April 16, 2025, in Washington County, Illinois, **Jesse L. Kempfer** (hereinafter called "Defendant") committed the offense of **Theft**, in violation of **720 ILCS 5/16-1(a)(2)(A)** in that Defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, knowingly obtained by deception, control over governmental property of the State of Illinois, said property being United States currency having a total value exceeding ten thousand dollars (\$10,000.00) and not exceeding one hundred thousand dollars (\$100,000.00), in that the Defendant caused false claims to be submitted to an Illinois Medicaid Managed Care Program, causing the Illinois Medicaid Managed Care Program to authorize payments to the Defendant through Medical Transportation Management (MTM, Inc.), with the intent to permanently deprive the State of Illinois of the use or benefit of said property. **Class 1 Felony.**

Count IV of IV: On or about August 30, 2023, to on or about April 16, 2025, in Washington County, Illinois, **Jesse L. Kempfer** (hereinafter called "Defendant") committed the offense of **Forgery**, in violation of **720 5/17-3(a)(2)** in that Defendant, through a series of acts performed in furtherance of a single intention and design, with the intent to defraud, knowingly delivered false documents to Illinois Medicaid Managed Care Program, Molina Healthcare, by way of Medical Transportation Management (MTM, Inc.), to wit: false entries related to gas mileage reimbursement for medical visits knowing the record had been thus made. **Class 3 Felony.**

The People of the State of Illinois,


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State of Illinois)
) ss.
County of Washington)

I, [REDACTED], Special Investigator for the Office of the Illinois Attorney General Medicaid Fraud Control Unit, on oath state that the above information is true to the best of my knowledge and information.

[REDACTED]

Subscribed and sworn to before me this 16th day of June, 2026.

[REDACTED]

Notary Public

[REDACTED]

The Court has examined the Information and has examined the Informant upon oath concerning the allegations contained herein.

It appears from the Information and the examination of said Informant that **Jesse L. Kempfer** has committed the offense.

IT IS SO ORDERED that a **Notice to Appear** issue.

Enter: June 16th, 2026.

[REDACTED]

Judge