

IN THE IOWA DISTRICT COURT FOR SCOTT COUNTY

THE STATE OF IOWA

Plaintiff,

vs.

MARJORIE MAE KOBERG

Defendant.

CASE NUMBER: _____

COMPLAINT AND AFFIDAVIT

The Defendant is accused of **Forgery**, in that, **Marjorie Mae Koberg**, on or about 3/10/25 through 3/26/25, in the County of Scott and the State of Iowa, in violation of Iowa Code section(s) 715A.2(1)(b); 715A.2(1)(c); 715A.2(2)(b), made, completed, executed, authenticated, issued, or transferred a writing so that it purported to be the act of another who did not authorize the act and uttered the writing, which purported to be a writing affecting legal relations and the defendant knew to be forged; **to wit:** While working as a personal care services provider, Koberg created fraudulent service documentation via the electronic visit verification system to indicate that she provided 18 hours (72 15-minute units) of personal care services for a Medicaid member between 3/10/25 through 3/26/25, during which time the member was out of town and not available to receive the purported services, which resulted in Koberg receiving \$158.20 from Medicaid for services not actually provided. Koberg signed the member's name in the electronic visit verification system without the member's permission attesting that the member received the services. (Aggravated Misdemeanor).



Kyle Paxton, Investigator
State of Iowa, Medicaid Fraud Control Unit
Department of Inspections, Appeals, & Licensing

AFFIDAVIT

STATE OF IOWA, COUNTY OF POLK

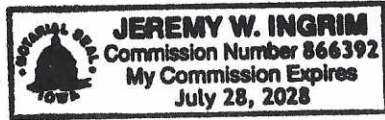
I, the undersigned, being duly sworn, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed this crime: On or about 3/10/25 through 3/26/25 in Scott County, Iowa, the Defendant, while working as a personal care services provider, Koberg created fraudulent service documentation via the electronic visit verification system to indicate that she provided 18 hours (72 15-minute units) of personal care services for a Medicaid member between 3/10/25 through 3/26/25, during which time the member was out of town and not available to receive the purported services, which resulted in Koberg receiving \$158.20 from Medicaid for services not actually provided. Koberg signed the member's name in the electronic visit verification system without the member's permission attesting that the member received the services. This is a Aggravated Misdemeanor.

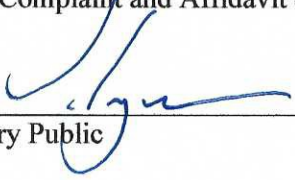
Signature of Affiant:



Kyle Paxton, Investigator
State of Iowa, Medicaid Fraud Control Unit
Department of Inspections, Appeals, & Licensing

Subscribed and sworn to before me by the person signing this Complaint and Affidavit on this 12th day of June, 2026.



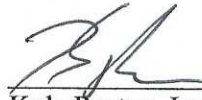

Notary Public

- ☒ Request that the Court find probable cause to allow the filing of this Complaint.
☒ Summons Requested.

IN THE IOWA DISTRICT COURT FOR SCOTT COUNTY

THE STATE OF IOWA Plaintiff, vs. MARJORIE MAE KOBERG  Defendant.	CASE NUMBER: _____ COMPLAINT AND AFFIDAVIT
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The Defendant is accused of **Tampering With Records**, in that, **Marjorie Mae Koberg**, on or about 3/10/25 through 3/26/25, in the County of Scott and the State of Iowa, in violation of Iowa Code section(s) 715A.5, knowing that the person had no privilege to do so, falsified, destroyed, removed or concealed a writing or record, with the intent to deceive or injure anyone or conceal any wrongdoing; **to wit:** While working as a personal care services provider, Koberg created fraudulent service documentation via the electronic visit verification system to indicate that she provided 18 hours (72 15-minute units) of personal care services for a Medicaid member between 3/10/25 through 3/26/25, during which time the member was out of town and not available to receive the purported services, which resulted in Koberg receiving \$158.20 from Medicaid for services not actually provided. Koberg signed the member's name in the electronic visit verification system without the member's permission attesting that the member received the services. (Aggravated Misdemeanor).

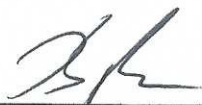


Kyle Paxton, Investigator
State of Iowa, Medicaid Fraud Control Unit
Department of Inspections, Appeals, & Licensing

AFFIDAVIT**STATE OF IOWA, COUNTY OF POLK**

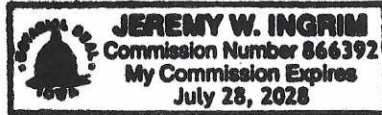
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Signature of Affiant:



Kyle Paxton, Investigator
State of Iowa, Medicaid Fraud Control Unit
Department of Inspections, Appeals, & Licensing

Subscribed and sworn to before me by the person signing this Complaint and Affidavit on this 12th day of June, 2026.



[Signature]
Notary Public

X Request that the Court find probable cause to allow the filing of this Complaint.
X Summons Requested.