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**IN THE DISTRICT COURT OF CHEROKEE COUNTY, KANSAS
ELEVENTH JUDICIAL DISTRICT**

STATE OF KANSAS,

Plaintiff,

vs.

Case No. CK-2026-CR-_____

DONALD RAY ELLISON III,

Defendant.

COMPLAINT - INFORMATION

COMES NOW the State of Kansas, by and through Kiley Deain, Assistant Attorney General, and for and on behalf of the State of Kansas allege and state against the defendant, **Donald Ray Ellison III:**

COUNT 1

**MAKING FALSE CLAIM, STATEMENT OR REPRESENTATION TO THE
MEDICAID PROGRAM**

K.S.A. 21-5927

Level 7 Nonperson Felony

That on or about a time between June 2022, through March 2023 in Cherokee County, Kansas, Donald Ray Ellison III, did then and there unlawfully and with intent to defraud, make, present, submit, offer or cause to be made, presented, submitted or offered any false or fraudulent claim for payment for any goods, service, item for which payment may be made, in whole or in part, under the Medicaid program, to wit: made a false claim for PCA services in the amount of approximately \$41,449.20 and received payment of approximately \$41,449.20, whether or not the claim is allowed or allowable, all in violation of K.S.A. 21-5927(a)(1)(A), and amendments thereto. Making false claim, statement or representation to the Medicaid program, of at least \$25,000.00 but less than \$100,000.00, a Level 7 nonperson felony. (Penalty Range: Up to 34

months in the Kansas Department of Corrections, 12 months of post-release and a fine of up to \$100,000.00. K.S.A. 21-6611, K.S.A. 21-6804 and amendments thereto).

OR IN THE ALTERNATIVE

**MAKING FALSE CLAIM, STATEMENT OR REPRESENTATION TO THE
MEDICAID PROGRAM**

K.S.A. 21-5927

Level 7 Nonperson Felony

That on or about a time between June 2022, through March 2023, in Cherokee County, Kansas, Donald Ray Ellison III, did then and there unlawfully and with intent to defraud, make, present, submit, offer or cause to be made, presented, submitted or offered any false or fraudulent statement or representation for use in determining payments which may be made, in whole or in part, under the Medicaid program, to wit: made a false representation to the Kansas Medicaid program for PCA services in the amount of approximately \$41,449.20 and received payment of approximately \$41,449.20, whether or not the claim is allowed or allowable, all in violation of K.S.A. 21-5927(a)(1)(B), and amendments thereto. Making false claim, statement or representation to the Medicaid program, of at least \$25,000.00 but less than \$100,000.00, a Level 7 nonperson felony. (Penalty Range: Up to 34 months in the Kansas Department of Corrections, 12 months of post-release and a fine of up to \$100,000.00. K.S.A. 21-6611, K.S.A. 21-6804 and amendments thereto.)

COUNT 2

MAKING FALSE INFORMATION

K.S.A. 21-5824

Level 8 Nonperson Felony

That on or about a time between June 2022, and March 2023, in Cherokee County, Kansas, Donald Ray Ellison III, did then and there unlawfully and with intent to defraud, make, generate, distribute, draw or cause to be made, generated, distributed or drawn, any written instruments, electronic data or entry in a book of account with knowledge that such information falsely states or represents some material matter or is not what it purports to be, to wit: submitted false PCA timesheets to Windsor Place Home Care for payment of services through the Kansas Medicaid program, in violation of K.S.A. 21-5824(a). Making False Information, a Level 8 Nonperson Felony. (Penalty Range: Up to 23 months of confinement in the Kansas Department of Corrections and a fine up to \$100,000, K.S.A. 21-6605 and K.S.A. 21-6611(a)(3), and amendments thereto).

WITNESSES

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Kim Epps, Kansas Attorney General's Office

Special Agent Cory Gilmore, Kansas Attorney General's Office
Special Agent Dean Harcrow, Kansas Attorney General's Office
American Bank of Baxter Springs – Custodian of Records
AuthentiCare – Custodian of Records
Kansas Department of Labor – Custodian of Records
Kansas Teachers Community Credit Union – Custodian of Records
United Healthcare – Custodian of Records
Windsor Place Home Care – Custodian of Records
Medicaid Fraud and Abuse Division of Kansas Attorney General – Custodian of Records

I, Kiley Deain, state that I am authorized and empowered to prosecute for and on behalf of the State of Kansas through the Office of the Kansas Attorney General, and the matters and things set forth and contained in the above and foregoing Complaint-Information are true and correct as I am informed and verily believe.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of June 2026.

KRIS W. KOBACH
Attorney General

/s/ Kiley Deain

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