

Debby Moody, #22679
Assistant Attorney General
Office of the Attorney General
120 SW 10th Avenue
Topeka, Kansas 66612
Phone: 785.368.7132
Fax: 785.291.3875
Email: debby.moody@ag.ks.gov

ELECTRONICALLY FILED
2026 Jun 15 PM 2:17
CLERK OF THE SHAWNEE COUNTY DISTRICT COURT
CASE NUMBER: SN-2026-CR-001197
PII COMPLIANT

**IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS
THIRD JUDICIAL DISTRICT**

STATE OF KANSAS,

Plaintiff,

vs.

Case No.

**MATTHEW GORDON LAMBERT,
Defendant.**

COMPLAINT - INFORMATION

COMES NOW the State of Kansas, by and through Deborah L. Moody, Assistant Attorney General, and for and on behalf of the State of Kansas allege and state against the defendant, **Matthew Gordon Lambert**:

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 September 2021, through November 2024 in Shawnee County, Kansas, Matthew Gordon Lambert, 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, facility accommodation 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 \$31,065.35 and received payment of approximately \$30,714.37, 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 September 2021, through November 2024 in Shawnee County, Kansas, Matthew Gordon Lambert, 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 he provided PCA services in the amount of approximately \$31,065.35 and received payment of approximately \$30,714.37, 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

UNLAWFUL ACTS CONCERNING COMPUTERS

K.S.A. 21-5839

Level 8 Nonperson Felony

That on or about a time between September 2021, through November 2024, in Shawnee County, Kansas, Matthew Gordon Lambert, did then and there unlawfully use a computer, computer system, computer network or any other property for the purpose of devising or executing a scheme or artifice with the intent to defraud or to obtain money, property, services or any other thing of value by means of false or fraudulent pretense or representation, in violation of K.S.A. 21-5839(a)(2) and amendments thereto. Unlawful acts concerning computers, a level 8 nonperson felony. (Penalty Range: Up to 23 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.)

WITNESSES

Special Agent Misty Davis, Kansas Attorney General's Office

██████████
██████████

FMS Independence, Inc. – Custodian of Records
FMS Windsor Place at Iola LLC. – Custodian of Records
FMS Unidos Personal Care LLC. – Custodian of Records
Kimberly Clearwater, Kansas Attorney General’s Office
Special Agent Dean Harcrow, Kansas Attorney General’s Office

██████████

MCO Sunflower – Custodian of Records
MCO UHC – Custodian of Records
Lawrence Memorial Hospital – Custodian of Records
Healthcare Resort of Kansas City – Custodian of Records
Providence Medical Center – Custodian of Records

██████████

Discover Bank – Custodian of Records
MFCU Custodian of Records

I, Deborah L. Moody, 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 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 15th day of June, 2026.

KRIS W. KOBACH
OFFICE OF THE KANSAS ATTORNEY GENERAL

/s/Deborah L. Moody

Deborah L. Moody, 22679
Assistant Attorney General
Medicaid Fraud and Abuse Division, a unit of the
Criminal Prosecution Division
120 SW 10th Avenue
Topeka, Kansas 66612
Phone (785) 368.7132
Fax (785) 368.6223
debby.moody@ag.ks.gov
ATTORNEY FOR THE STATE