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**IN THE DISTRICT COURT OF WYANDOTTE COUNTY, KANSAS
TENTH JUDICIAL DISTRICT**

STATE OF KANSAS,

Plaintiff,

vs.

Case No. WY-2026-CR-

SHARAE MICHELLE LORA

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, **Sharae Michelle Lora**:

COUNT 1

**MAKING A 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 November 2022 and February 2024, in Wyandotte County, Kansas, Sharae Michelle Lora, 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 \$36,847.08 and received payment of approximately \$36,847.08, 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 November 2022 and February 2024, in Wyandotte County, Kansas, Sharae Michelle Lora, 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: to wit: made a false representation to the Kansas Medicaid program for PCA services in the amount of approximately \$36,847.08 and received payment of approximately \$36,847.08 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 November 2022 and February 2024, in Wyandotte County, Kansas, Sharae Michelle Lora, 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 obtain money, property, services or any other thing of value by means of false or fraudulent pretenses or representation by using such computer, computer system, computer network or any other property, to wit: submitted or caused to be submitted falsified webservice claims to induce payment from the Kansas Medicaid program, in violation of K.S.A. 21-5839(a)(2). Unlawful Acts Concerning Computers, 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.)

COUNT 3

IDENTITY THEFT

K.S.A. 21-6107

Level 8 Nonperson Felony

That on or about a time between November 2022 and February 2024, in Wyandotte County, Kansas, Sharae Michelle Lora, did then and there unlawfully and knowingly obtain, possess, transfer or use the personal identifying information, or document containing the same, belonging to or issued to another person, to wit: Tiaye Rogers (DOB XX/XX/2002), with intent to defraud the Kansas Medicaid program and/or Tiaye Rogers, in violation of K.S.A. 21-6107(a)(1), Identity theft, 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. 22-6611, and amendments thereto.)

WITNESSES

[REDACTED]

Special Agent Cory Gilmore, Kansas Attorney General's Office

Kim Epps, Kansas Attorney General's Office

Special Agent Jack Sanders, Kansas Attorney General's Office

ADP – Custodian of Records

Amazon – Custodian of Records

Bank of America – Custodian of Records

Bank of Midwest – Custodian of Records

FedEx – Custodian of Records

Fiserv – Custodian of Records

Royal City Bell – Custodian of Records

United Healthcare – Custodian of Records

Wisely Pay – Custodian of Records

Kansas AG Medicaid Fraud and Abuse Division – 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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