

STATE OF LOUISIANA : **19TH JUDICIAL DISTRICT COURT**

VERSUS : **PARISH OF EAST BATON ROUGE**

ASHA CLARK : **STATE OF LOUISIANA**



AFFIDAVIT

BEFORE ME, the undersigned Authority of the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, Officer Aaron Cormier, with the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, Baton Rouge, Louisiana, who, upon being duly sworn by me, deposes and says that ASHA CLARK of [REDACTED], did violate:

2 Count(s) of 14:70.1-- MEDICAID FRAUD-- (Felony)

Between the approximate dates of 05-22-2024, through and including 11-01-2024, by intentionally defrauding the Louisiana Medicaid Program by causing the presentation, for payment, false or fraudulent claims for providing medical services or knowingly and intentionally submitted false information in order to obtain greater compensation than that which was legally authorized for furnishing service.

OVERVIEW OF THE LOUISIANA MEDICAID PROGRAM

A brief explanation of how the Medicaid Program operates is helpful in understanding the fraud perpetrated by ASHA CLARK against the State of Louisiana. The Louisiana Department of Health (hereinafter "LDH") is statutorily authorized to enter into contracts with entities providing medical or medically related services to Louisiana Medicaid recipients. Entities that contract with LDH to provide services to Medicaid recipients are referred to as providers. In order for a provider

to be paid for the services rendered to Medicaid recipients, they must submit claims for payment to GAINWELL Technologies (formerly known as DXC Technology) (hereinafter “GAINWELL”), the fiscal intermediary for the State of Louisiana’s Medicaid Program. GAINWELL receives and processes all Medicaid claims at its office located in East Baton Rouge Parish, and subsequently remits payments to the providers.

Home and Community Based Services (hereinafter “HCBS”) licenses are granted by LDH to providers that render home and community based services to Louisiana Medicaid recipients. HCBS services are designed to assist individuals with functional impairments with their daily living activities. HCBS services must be rendered by an employee of the HCBS provider, who has been trained as a Direct Service Worker (hereinafter “DSW”). DSWs are trained on, and required to, fill out true and accurate service logs, which must clearly reflect the services provided and billed. Based upon the service logs filled out by the DSW, HCBS providers thereafter submit claims to GAINWELL that are subsequently processed and paid.

Additionally, in the fall of 2016, LDH made available an Electronic Visit Verification (EVV) system for providers to train their DSW and start utilizing it for in home services verification in conjunction with the existing prior authorization data contract with Statistical Resources, Inc. (SRI). Through either a smart phone or electronic tablet, the EVV system utilizes GPS to pin point when a caregiver arrives at and leaves a specific location, such as the client’s home. The EVV system also details the name of the individual providing the service, type of service and individual receiving the service.

MEDICAID FRAUD SCHEME AND COUNTS

On November 14, 2024, the Medicaid Fraud Control Unit received a complaint from Quality Support Coordination, who provides mediation for Louisiana Medicaid recipients, that Asha Clark who was employed as a Direct Service Worker (DSW), submitted false claims to Medicaid for services not provided to Medicaid recipient, A.C., who was incarcerated during the times when the services were allegedly rendered. During the investigation of said complaint and according to employee records from Fiscal Agent, Acumen, it was learned that Asha Clark was employed as A.C.’s Direct Service Worker (DSW) within the Self Direction program, which is a Medicaid service delivery model that allows participants or an authorized representative to take on the role of the employer for their own care. Asha Clark was employed by Employer/Authorized representative and grandmother of Asha Clark, Ruth Watson, on October 31, 2023. The investigation also revealed that A.C. was incarcerated in the Washington Parish Jail between May 22, 2024 through May 30, 2024 and August 3, 2024 through December 5, 2024.

Affiant's review of electronic time entries obtained from Acumen and electronic visit verification (EVV) system utilized by the Louisiana Department of Health (LDH), LaSRS (Louisiana Service Reporting System) submitted by Asha Clark, and a list of incarceration dates obtained from Washington Parish Jail revealed the following corresponding overlapping dates:

05/22/2024	08/20/2024	09/12/2024	10/06/2024	10/28/2024
05/23/2024	08/21/2024	09/13/2024	10/07/2024	10/29/2024
05/24/2024	08/22/2024	09/15/2024	10/08/2024	10/30/2024
05/27/2024	08/25/2024	09/16/2024	10/09/2024	10/31/2024
05/28/2024	08/26/2024	09/17/2024	10/10/2024	11/01/2024
05/29/2024	08/27/2024	09/18/2024	10/11/2024	
05/30/2024	08/28/2024	09/19/2024	10/13/2024	
08/05/2024	08/29/2024	09/20/2024	10/14/2024	
08/06/2024	08/30/2024	09/22/2024	10/15/2024	
08/07/2024	09/01/2024	09/23/2024	10/16/2024	
08/08/2024	09/02/2024	09/24/2024	10/17/2024	
08/09/2024	09/03/2024	09/25/2024	10/18/2024	
08/12/2024	09/04/2024	09/26/2024	10/20/2024	
08/13/2024	09/05/2024	09/27/2024	10/21/2024	
08/14/2024	09/06/2024	09/29/2024	10/22/2024	
08/15/2024	09/08/2024	09/30/2024	10/23/2024	
08/16/2024	09/09/2024	10/01/2024	10/24/2024	
08/18/2024	09/10/2024	10/02/2024	10/25/2024	
08/19/2024	09/11/2024	10/03/2024	10/27/2024	

On the aforementioned dates, and according to billing records, Asha Clark purportedly rendered care to A.C. while A.C. was an inmate at Washington Parish Jail. A.C.'s plan of care received from Quality Support Coordination revealed that A.C. was to be provided care for days and hours of: Mondays through Fridays hours 12:00 am to 08:00 am and 3:00 pm to 5:00 pm, Saturdays hours 12:00 pm to 4:45 pm and Sundays hours 12:00 pm to 5:00 pm. The plan of care required that the DSW render services to A.C. including community activities, transportation, purchasing items, and supervision throughout activity during the previously listed times and days. Affiant observed documents of training received from Acumen, including but not limited to, an authorization for direct deposit form signed by Asha Clark and a "Good to Go Notification" document which showed Asha Clark's Username and Password for her Electronic Visit Verification mobile app named DCI that Asha Clark used to submit false times for services allegedly rendered when A.C. was incarcerated.

During an interview with Affiant, when asked if she, Asha, at any point during her care for A.C., was A.C. not around, Asha replied, "there was this one period when A.C. was incarcerated". Affiant showed Asha Clark signed employee enrollment and provider agreement documents obtained from Acumen, to which she acknowledged the signatures were hers. Affiant showed Asha Clark her "Good to Go Notification" to which she acknowledged the Username in the document was her Login information to her DCI mobile app. Affiant read to Clark, agreement number 7 located in the Provider Agreement, which stated the following:

“The provider/employee acknowledges that the funds used to pay the employee are Medicaid funds and that the submission of false information on time records may subject the employee to criminal action, in addition to repayment of any funds”.

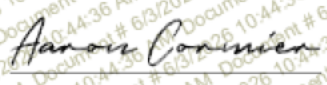
Clark stated she remembers this agreement.

Asha Clark submitted false documentation in the form of electronic time entries via DCI EVV app/website, for payment to Acumen who in turn submitted claims to Medicaid for payment, although no services were rendered, due to A.C. being incarcerated in Washington Parish Jail.

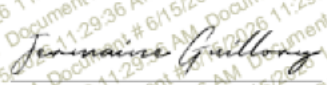
Asha Clark’s actions resulted in the submission of Eighty-one (81) false claims to the Louisiana Medicaid Program in total of two thousand ninety-six (2096) units and the sum of six thousand six hundred ten dollars and seventy-nine cents (\$6,610.79)

Probable cause has been shown that on 05-22-2024, through and including 11-01-2024, ASHA CLARK committed Medicaid fraud.

THEREFORE, for the above stated reasons, Affiant prays for the issuance of a Warrant of Arrest for ASHA CLARK.


Officer Aaron Cormier
Affiant

THUS DONE AND PASSED on the 15 day of June, 2026.


Jermaine Guillory
State of Louisiana

: 19TH JUDICIAL DISTRICT COURT

: PARISH OF EAST BATON ROUGE

: STATE OF LOUISIANA



TO ANY LAW ENFORCEMENT OFFICER

Affidavit having been made by Officer Aaron Cormier, with the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, that between 05-22-2024, through and including 11-01-2024, in the Parish of East Baton Rouge, State of Louisiana, the offender, ASHA CLARK, [REDACTED]

did commit the crime(s) of:

2 Count(s) of 14:70.1-- MEDICAID FRAUD-- (Felony)

You are, therefore, commanded forthwith to arrest the said offender and take him/her forthwith to be booked and charged in accordance with the law.

Given under my official signature, this 15 day of June, 2026.

Jermaine Guillory

Jermaine Guillory
19th Judicial District Court
State of Louisiana