

7TH JUDICIAL DISTRICT COURT
PARISH OF CONCORDIA
STATE OF LOUISIANA

ITEM NUMBER:
57-4068

WARRANT NUMBER:

AFFIDAVIT FOR ARREST WARRANT

STATE OF LOUISIANA

VERSUS

CAROLYN A BROWN -

I, Special Agent Evelyn B Robinson, with the Medicaid Fraud Control Unit, certify under oath based on the information outlined below, that there is probable cause to believe Carolyn A Brown on or about the date(s) of 06-20-2022 to 03-17-2026 did commit:

- 1 Count(s) of 14:70.1-- MEDICAID FRAUD-- (Felony)
- 1 Count(s) of 14:70.1-- MEDICAID FRAUD-- (Felony)
- 1 Count(s) of 14:70.1-- MEDICAID FRAUD-- (Felony)
- 1 Count(s) of 14:70.1-- MEDICAID FRAUD-- (Felony)
- 1 Count(s) of 14:133-- FILING FALSE PUBLIC RECORDS-- (Felony)

within this State and Parish at: 1109 Carter Street, Suite 10, Vidalia, LA 71373 in Concordia Parish and the jurisdiction of the 7th Judicial District Court, contrary to the form of the statutes of the State of Louisiana in such case made and provided, and against the peace and dignity of the same, in that the following did occur:

A brief explanation of how the Medicaid program operates is helpful in understanding the fraud perpetrated by Carolyn Brown. As part of the Medicaid program in Louisiana, HCBS is a covered service in which Medicaid reimburses the provider who renders these services. Managed Care Organizations (hereinafter MCO) are under contract with the Louisiana Department of Health (hereinafter LDH). Each MCO enters into a contract with various medical providers and are credentialed and subsequently qualified to provide services to eligible Medicaid recipients. Upon completion of the medically necessary service, a claim is submitted to the appropriate MCO, and payment is remitted to the provider.

On January 7, 2026, the Louisiana Department of Justice, Office of the Attorney General, Criminal Division, Medicaid Fraud Control Unit (hereinafter, "MFCU") opened an investigation involving a Medicaid provider, Positive Choices Counseling Service, LLC, (hereinafter Positive Choices). Positive Choices is located at 1109 Carter Street, Suite 10, Vidalia, LA 71373 and is voluntarily enrolled in

Louisiana's Medicaid Program operating under state-assigned Medicaid ID # [REDACTED]. Specifically, Positive Choices is licensed for the purpose of providing therapy and counseling services for eligible Medicaid recipients. As a Home and Community Service (hereinafter HBCS) provider, it is required, by Louisiana Department of Health (hereinafter LDH), that the Medicaid providers maintain a current CPR certification. Carolyn Brown, [REDACTED], along with her husband, Edward Brown are the current owners of Positive Choices.

This complaint was derived from the Louisiana Department of Health- PI/SURS and Managed Care Co., Louisiana Healthcare Connections (Centene), who provided information alleging that the providers/owners, Edward Brown and Carolyn Brown, submitted fraudulent CPR certifications from the National CPR Foundation. The fraudulent certifications were for the years 2022 and 2024. (CPR certifications are valid for two (2) years.) The 2022 certifications would have covered the years 2022-2024 while the 2024 certifications would have covered the years 2024-2026.

On March 16, 2026, your Affiant met with Carolyn Brown, owner of the company, at her office and advised her of your Affiant's identity. Brown was advised of her rights per a rights waiver form, which she stated she understood and signed. Brown, who owned the company for 27 years, was questioned about the fraudulent CPR certificates submitted for her and her husband, Edward Brown, Director, with the company. Brown could not give a reason for the falsified CPR certificates for her and her husband. Brown did recall that she and her husband took the CPR classes online, but they did not pay at the end of the classes. Brown has been using the National CPR Foundation for CPR certification since COVID.

After searching for files for the current CPR certificates and the 2022-2024 certificates and not finding any, Brown stated she would continue searching and contact the National CPR Foundation. Brown did admit she was the person that submitted the paperwork, which included the fraudulent CPR certificates for the business when the company was audited by Centene. An example certificate on the National CPR Foundation website includes the certification date, the renewal date, the ID number, and the instructor's name, unlike the Brown's 2022 and 2024 certificates.

On April 30, 2026, Agent received from Carolyn Brown copies of her and her husband's 2022 and 2024 (the fraudulent certificates) and their current certificates, which were renewed on March 16, 2026. The CPR certificates: CPR/AED/FIRST AID certificates for Carolyn Brown, for the years 2022, 2024, and 2026. CPR/AED/FIRST AID certificates for Edward Brown, for the years 2022, 2024, and 2026. Basic Life Support (BLS)certifications are valid for two (2) years. Agent checked the National CPR Foundation website, using the EVerify tool to verify all the certificates. The E-Verify tool requires entering the certificate ID. There was no ID on either 2022 or 2024 certificates Brown sent. Also, there was no renewal date on those certificates. In comparison, the 2026 certificates for C. Brown and E. Brown were renewed on March 16, 2026, and both certificates have the date of the certification, renewal date, identification number, and the instructor's name, and show to be valid on the website. Agent was unable to interview Edward Brown during this investigation.

The table below shows a breakdown of the total paid by Medicaid for the period covered by the fraudulent certifications. Total paid by Medicaid to the provider is **\$416,039.56**.

Year	Total Units	Total Paid
Carolyn Brown	16,597	\$416,039.56
2022	105	\$2,045.69
2023	1,085	\$28,933.12
2024	8,341	\$200,477.74
2025	5,845	\$156,073.61
2026	1,221	\$28,509.40
Grand Total	16,597	\$416,039.56

Brown's actions resulted in the submission of false claims by Positive Choices to the Louisiana Medicaid Program. Specifically, Brown submitted false claims to obtain payment to which she was not legally entitled, due to her submission of fraudulent CPR certifications while rendering services from June 20, 2022, through March 17, 2026. The total monetary amount of services fraudulently billed to the Medicaid Program as a result of Brown's submission of fraudulent CPR certifications is \$416,039.56.

Probable cause has been established that Carolyn A. Brown committed the offense of Medicaid fraud, 4 counts, in violation of LA R.S. 14:70.1 and one (1) count of filing or maintaining false public records. Medicaid fraud is defined as: The act of any person, who, with intent to defraud the state through any medical assistance program created under the Federal Social Security Act and administered by the Louisiana Department of Health (LDH) or any other state agency, does any of the following:

- (1) Presents for allowance or payment any false or fraudulent claim for furnishing services or merchandise.
- (2) Knowingly submits false information in order to obtain greater compensation than that to which he is legally entitled to for furnishing services or merchandise.
- (3) Knowingly submits false information for the purpose of obtaining authorization for furnishing services or merchandise.

Filing or maintaining false public records is defined as:

A. Filing or maintaining false public records is the filing or depositing for record in any public office or with any public official, or the maintaining as required by law, regulation, or rule, with knowledge of its falsity, of any of the following:

- (1) Any forged document.
- (2) Any wrongfully altered document.
- (3) Any document containing a false statement or false representation of a material fact.

B. The good faith inclusion of any item of cost on a Medical Assistance Program cost report which is later determined by audit to be nonreimbursable under state and federal regulations shall be an affirmative defense to a violation of this Section.

C.(1) Whoever commits the crime of filing false public records shall be imprisoned for not more than five years with or without hard labor or shall be fined not more than five thousand dollars, or both.

(2) In addition to the penalty provided for in Paragraph (1) of this Subsection, a person convicted of the provisions of this Section may be ordered to pay restitution to the state if the state suffered a loss as a result of the offense. Restitution shall include the payment of legal interest at the rate provided in R.S. 13:4202.

I hereby certify under oath the information contained herein to be true and correct, to the best of my knowledge, under penalties of perjury.

Special Agent Evelyn B Robinson
Affiant

Judge John C Reeves
7TH JUDICIAL DISTRICT COURT
PARISH OF CONCORDIA
STATE OF LOUISIANA

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VERSUS

CAROLYN A BROWN - [REDACTED]

[REDACTED]

[REDACTED]

TO ANY COMMISSIONED PEACE OFFICER:

WHEREAS, complaint has been made to me, upon the sworn affidavit of Special Agent Evelyn B Robinson, with the Medicaid Fraud Control Unit, charging one Carolyn A Brown with:

- 1 Count(s) of 14:70.1--MEDICAID FRAUD--(Felony)
- 1 Count(s) of 14:70.1--MEDICAID FRAUD--(Felony)
- 1 Count(s) of 14:70.1--MEDICAID FRAUD--(Felony)
- 1 Count(s) of 14:70.1--MEDICAID FRAUD--(Felony)
- 1 Count(s) of 14:133--FILING FALSE PUBLIC RECORDS--(Felony)

Committed on or about the date(s) of 06-20-2022 to 03-17-2026.

Now, therefore, you are hereby commanded, in the name of the State, to apprehend and arrest and book the said accused to answer the said complaint. You are further commanded to keep the said accused in safe custody until released according to law, and this shall be your warrant.

Given under my official signature, this 18 day of Jun, 2026 at 10:42 AM.

John C Reeves
Document # 6/18/2026 10:42 AM
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Judge John C Reeves
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