

STATE OF LOUISIANA : 19TH JUDICIAL DISTRICT COURT

VERSUS : PARISH OF EAST BATON ROUGE

Chrissshantenite Shanquell Paul : STATE OF LOUISIANA

[REDACTED]

AFFIDAVIT

BEFORE ME, the undersigned Authority of the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, Special Agent Stuart Boykin, 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 Chrissshantenite Shanquell Paul [REDACTED], did violate:

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

between the dates of 03-04-2023, through and including 04-21-2023, in the Parish of East Baton Rouge, State of Louisiana, in that Chrissshantenite Shanquell Paul intentionally defrauded Louisiana's Medicaid Program by presenting for allowance or payment, or causing the presentation for allowance or payment of false or fraudulent claims for furnishing services.

OVERVIEW OF THE LOUISIANA MEDICAID PROGRAM

A brief explanation of how the Medicaid Program operates is helpful in understanding the fraud perpetrated by Chrissshantenite Shanquell Paul, against the State of Louisiana. The Louisiana Department of Health (hereinafter, "LDH") is statutorily authorized to enter into contracts called "provider agreements" with entities who provide medical or medically-related services. Following the execution of such provider agreements, these entities are certified as eligible Medicaid "providers." Through this provider agreement mechanism, providers are reimbursed by LDH for

services rendered to Medicaid Recipients. Reimbursement is made to a provider in accordance with the rates that are established by LDH.

Every claim submitted on part of a provider discloses the recipient identification number and name of the Medicaid recipient receiving the services, address of the Medicaid recipient, description of the service provided, amount billed for each service, and date of service. These claims are all presented and submitted by the providers to Gainwell Technologies (formerly known as DXC Technology) (hereinafter “Gainwell”), the fiscal intermediary for the State of Louisiana’s Medicaid System. Gainwell Technologies receives and processes all Medicaid billings at its office located in East Baton Rouge Parish and subsequently remits payment to the providers.

The Medicaid Program has a Long Term Personal Care Service Program (hereinafter, “LTPCS”) that is administered by LDH. LTPCS is assistance rendered to a disable person with functional impairments by a caregiver employed by a licensed LTPCS agency and consists of performing tasks necessary to the disabled person’s well-being and daily living activities.

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.

Suspect caused provider to bill Medicaid for services not rendered while Medicaid Recipient was in a nursing facility.

MEDICAID FRAUD SCHEME AND COUNTS

On 12/04/2024, the Louisiana Department of Health furnished information and documentation regarding Sunset Personal Care, a Medicaid Personal Care Services provider located in Baton Rouge. According to the information provided, Sunset Personal Care had self-reported one of its employees for billing for services allegedly provided to a Medicaid recipient while the recipient was actually receiving services from an in-patient Nursing Rehab Facility.

On 01/06/2025, the LA Medicaid Fraud Control Unit (MFCU) opened a case on the Direct Service Worker (DSW), Chrisshantenite Paul who is the granddaughter of the recipient, [REDACTED], and who allegedly submitted false claims to Sunset Personal Care indicating that she had provided personal care services that were not rendered.

La R.S. 14:70.1, Medicaid Fraud, is defined as the “...act of any person who, with intent to defraud the state or any person or entity through any medical assistance program created under the federal Social Security Act and administered by the Louisiana Department of Health 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 for the purpose of obtaining greater compensation than what to which he is legally entitled for furnishing services or merchandise 3) knowingly submits false information for the purpose of obtaining authorization for furnishing services or merchandise...”

Affiant compared billing records from Sterling Place Nursing and signed time sheets of Chrisshantenite Paul from Sunset Personal Care for services billed for the dates 03/06/2023 through 04/21/2023.

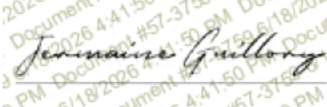
Based on the information provided above, Chrissshantenite Paul, (DSW), submitted false documentation to Sunset Personal Care for services she did not render, causing Sunset Personal Care to submit false claims to Medicaid. Chrissshantenite Paul committed one count of Medicaid Fraud, La. R.S. 14:70.1, where Count #1 covers the timeframe beginning 3/6/2023 through 4/21/2023.

THEREFORE, for the above stated reasons, Affiant prays for the issuance of a Warrant of Arrest for Chrisshantenite Shanquell Paul

Stuart Boykin
Special Agent Stuart Boykin

Affiant

THUS DONE AND PASSED on the 18 day of June, 2026.


Jermaine Guillory
State of Louisiana

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WARRANT OF ARREST

TO ANY LAW ENFORCEMENT OFFICER

Affidavit having been made by Special Agent Stuart Boykin, Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, that between 03-04-2023, through and including 04-21-2023, in the Parish of East Baton Rouge, State of Louisiana, the offender, Chrisshantenite Shanquell Paul, [REDACTED]

[REDACTED] did commit the crime(s) of:

1 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 18 day of June, 2026.

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