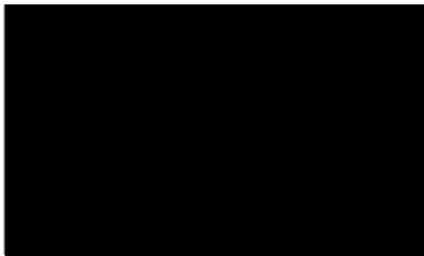


STATE OF LOUISIANA : 1ST JUDICIAL DISTRICT COURT
VERSUS : PARISH OF CADDO
CONSTANCE AMOS JONES : STATE OF LOUISIANA



FILED
JUN 16 2026

PATRICK HUNT
DEPUTY CLERK OF COURT

AFFIDAVIT

BEFORE ME, the undersigned authority, personally came and appeared Matthew W. Downhour, Special Agent for the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, Baton Rouge, Louisiana, who having been duly sworn, did depose and say that an arrest warrant should be issued for the above-named person, Constance Amos Jones, [REDACTED] the owner of Life Matters Counseling and Therapy, LLC, located at 7505 Pines Road Suite 1200-I, Shreveport, La, 71129, who did commit a felony criminal offense in violation of Louisiana Revised Statute 14:133, filing or maintaining false public records, two (2) counts, while she was employed as the owner of Life Matters Counseling and Therapy, LLC, located in Shreveport, Louisiana, Caddo Parish based on the following:

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

On October 10, 2025, 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, Life Matters Counseling and Therapy, hereinafter Life Matters.

Life Matters is located at 7505 Pines Rd Suite 1255, Shreveport, Louisiana, 71129 and is voluntarily enrolled in Louisiana's Medicaid Program billing under the National Provider Identification # [REDACTED]. Specifically, Life Matters is licensed for the purpose of providing therapy and counseling services for eligible Medicaid recipients. As an HCBS provider, it is required, by LDH, that the Medicaid providers employed by Life Matters maintain a current CPR certification. LDH rules also require that Life Matters administration performs monthly Office of Inspector General (hereinafter OIG) exclusion searches and Louisiana State adverse actions searches on all employees providing services to Medicaid recipients. Constance Amos Jones (hereinafter Jones) is the owner of Life Matters and founded the company in 2014. The investigation was based on the allegation that Jones altered/falsified CPR certifications, falsified OIG exclusions search results, and falsified Louisiana state adverse actions search results that are required on all Life Matters staff members.

In July of 2025, LHC conducted a quality review audit of the Life Matters employees. It was discovered that Jones submitted forged documentation, a CPR certificate and card, several OIG exclusions search results, and Louisiana State adverse actions search results in response to this audit. The mentioned fraudulent/falsified documents were emailed to Matthew Broome, the Centene SIU investigator conducting the quality review audit of Life Matters on behalf of LHC. The forged OIG exclusions and LDH adverse actions check documentation was for seven employees, Barbara Maiden, Crystal Coutee, Carolyn Grayson, Myrtis Jones, Roderick Meaux, Kimberly Law and Tiffany George.

The CPR documents were submitted to show completion of CPR course certification for one employee, Barbara Maiden. Attempts were made to verify the ID number on the on the CPR card [REDACTED] provided by Jones and the results came back to a different name, [REDACTED]. [REDACTED] is not an employee of Life Matters. Also, attempts were made to verify the ID number on the on the CPR certificate [REDACTED] provided by Jones for Barbars Maiden, and the results came back as "No results, we could not find any certificates with the information provided."

In February of 2026, Affiant interviewed Matthew Broome, LHC, and Centene SIU Investigator. Broome relayed that Constance Jones submitted the mentioned falsified documents to him, via

email, in response to a quality audit of Life Matters employees conducted by a Medicaid managed care organization, Louisiana Healthcare Connections.

In February of 2026, Affiant obtained and reviewed the mentioned documents submitted to LHC by Jones. Included in these records were copies of the falsified CPR certificate & card involving Barbara Maiden, as well as the falsified OIG exclusions search results and Louisiana state adverse actions search results for all seven employees. These documents had noticeable differences from authentic documents to include grammar mistakes, mismatched font, and spacing/arrangement differences.

In May of 2026, Affiant interviewed Jones. In 2025, Jones received a request from LHC for documents relating to the training and certification of her employees. Jones realized she did not complete the monthly OIG exclusion searches and Louisiana state exclusion checks per LDH guidelines.

Jones admitted to submitting the falsified CPR certification for the one employee but denied knowing it was falsified. Jones admitted to falsifying the OIG exclusions search results and Louisiana state adverse actions search results for all seven employees. She then submitted these falsified documents to LHC in response to their records request to falsely show she and her employees followed LDH guidelines.

Undersigned Affiant's investigation further revealed that between July 3, 2024, through June 29, 2025, a total of \$44,331.87 has been identified as the total amount of Medicaid services billed by and paid to Life Matters for services rendered when this provider was not legally entitled to receive payment due to noncompliance with mandatory program rules.

Both federal and state law, regulations, and/or rules that govern the Medicaid Program require Medicaid providers to maintain program-related records for a five-year period. The record retention obligation is documented in each written provider agreement, which is a requirement for any provider prior to enrollment in Louisiana's Medicaid Program. (La. R.S. 46:437.12(A)(3); La. Admin. Code. Tit.50, Pt I, §4147; Federal Regulation 42 C.F.R. §431.107.)

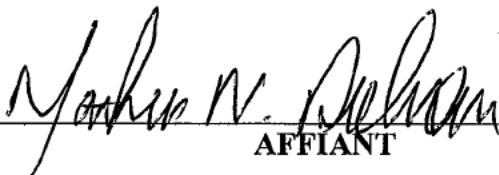
As a result of the investigation, based on a review of the mentioned records and interviews, there is probable cause to believe that Constance Amos Jones committed La. R.S. 14:133 (2) counts of Filing or maintaining false public records while employed at Life Matters Counseling & Therapy: Count #1 is for all falsified documentation involving the CPR records, and Count #2 is for all falsified documentation involving the federal and state exclusion searches.

La. R.S. 14:133 Filing or maintaining false public records is defined as 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.

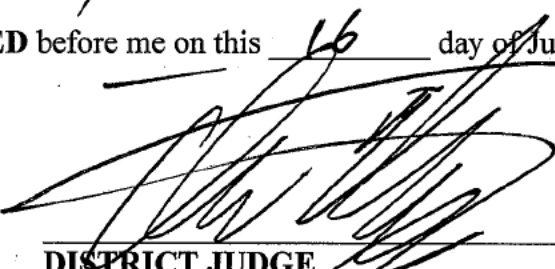
Therefore, Special Agent Matthew Downhour, with the Louisiana Department of Justice, Office of the Attorney General, Criminal Division, Medicaid Fraud Control Unit, is seeking a warrant for the arrest of Constance Amos Jones for two counts of Filing or Maintaining False Public Records in violation of La. R.S. 14:133.

THEREFORE, for the above stated reasons, Affiant prays for the issuance of a warrant of arrest for Constance Amos Jones, [REDACTED] for two (2) counts of Louisiana Revised Statute 14:133, Filing or maintaining false public records.


AFFIANT

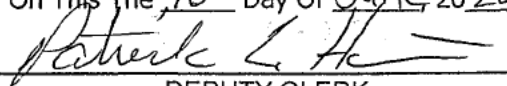
SWORN TO AND SUBSCRIBED before me on this 16 day of June 2026 in Shreveport, Louisiana

Time: 12:01


DISTRICT JUDGE
1st JUDICIAL DISTRICT COURT
PARISH OF CADDO
STATE OF LOUISIANA

ATTEST
A TRUE COPY

On This The 16TH Day Of June, 2026


DEPUTY CLERK
FIRST JUDICIAL DISTRICT COURT
CADDO PARISH, LA.

STATE OF LOUISIANA : 1st JUDICIAL DISTRICT COURT
VERSUS : PARISH OF CADDO
CONSTANCE AMOS JONES : STATE OF LOUISIANA

WARRANT OF ARREST

TO: ANY LAW ENFORCEMENT OFFICER

An affidavit having been made by Special Agent Matthew W. Downhour, of the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, the offender, Constance Amos Jones, [REDACTED]

[REDACTED] did commit (2) counts of the crime of filing or maintaining false public records, defined by Louisiana Revised Statutes 14:133, when she submitted records that she falsified in response to an audit conducted in July of 2025 where the timeframe on the falsified records covers the timeframe of 7/3/2024 – 6/29/2025:

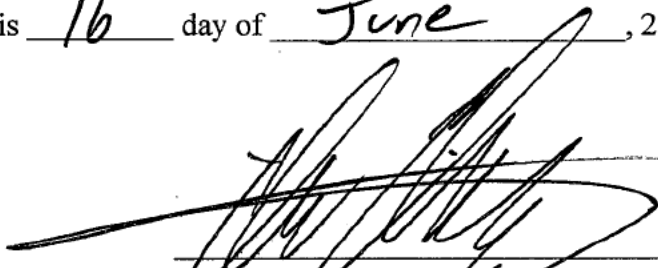
Filing or maintaining false public records is defined as the filing or depositing for record in any public office or with any public official, or the maintaining as required by law, regulation, or rule, with knowledge of its falsity, of any of the following:

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

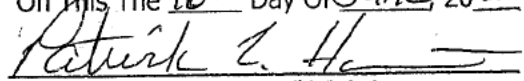
You are therefore commanded forthwith to arrest the said offender and take her forthwith to be booked and charged in accordance with the law.

ORDERED AND SIGNED this 16 day of June, 2026.

Time: 12:01


DISTRICT JUDGE
1st JUDICIAL DISTRICT COURT
PARISH OF CADDO
STATE OF LOUISIANA

JUDGE CHRIS VICTORY ATTEST
A TRUE COPY

On This The 16TH Day Of June, 2026

DEPUTY CLERK
FIRST JUDICIAL DISTRICT COURT
CADDO PARISH, LA.

Bond: \$25,000
JONEC573994ARWMWD