

STATE OF LOUISIANA

: 19TH JUDICIAL DISTRICT COURT

VERSUS

: PARISH OF EAST BATON ROUGE

Kirstan Shonta Wells

: 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 Hannah Amy, 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 Kirstan Shonta Wells [REDACTED] [REDACTED] did violate:

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

Between the approximate dates of 11-14-2022, through and including 08-17-2023, 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 Kirstan Shonta Wells 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 June 23, 2022, the Medicaid Fraud Control Unit (MFCU) opened an investigation into Direct Service Worker (DSW), Kirstan Shonta Wells (Wells), after receiving a complaint from the Louisiana Department of Health (LDH) alleging fraud involving billing for services not rendered. The complainant alleged that DSWs submitted billings for purportedly rendering personal care services through Acumen Fiscal Agent (hereinafter “Acumen”) to a Medicaid recipient bearing the initial “J.R.” through the Self-Direction Program.

Upon opening this investigation, MFCU Special Agents gathered additional information, obtained records, and conducted interviews. To date, Agents have learned the following information, detailed herein.

On 11/14/2022, Wells began working for employer Jaquala Robertson as a DSW to provide personal care services to J.R., a Medicaid recipient, who is Jaquala Robertson's son. Wells, as the DSW, is to provide services and support described in J.R.'s Plan of Care and document the services rendered on a service log. The service log details and underlines the services rendered, since this information is required for the claim to be billed.

Acumen Fiscal Agent, 5416 Baseline Rd #200, Mesa, AZ 85206, is one of the Fiscal Employer Agents that provides fiscal management services for Self-Direction participants that include ensuring current and initial participants are provided with information they need to effectively participate in this option including processing employee payroll and required taxes in accordance with state, federal and Medicaid regulations regarding vendor fiscal/employer agents, and ensuring questions from participants, support coordinator and LDH staff are responded to in a timely manner. According to the Louisiana Department of Health guidelines, the Self-Direction program is a service delivery option that allows participants to become the employers of the people they choose to hire to provide support for the Medicaid recipient.

Jaquala Robertson, the employer in the self-direction program, is responsible for reviewing, verifying, and approving all pending time entries through the Acumen DCI Web Portal. The employee, Wells, enters or clocks in her time through the portal, but cannot be paid until the employer officially signs off. If any entry is incorrect, the employer must actively reject it in the portal so that the employee, Wells, can correct and resubmit the time.

Through investigative means, MFCU Agent Amy obtained records that showed that Wells was part of the self-direction program through Acumen Fiscal Agent. The records obtained from Acumen Fiscal Agent revealed punch entry details under Wells' name, indicating specific dates and times Wells was purporting to provide Medicaid services to J.R. Records from Acumen showed paychecks for the aforementioned hours to Wells, and also included daily caregiver notes from Acumen which detailed specific services that Wells would have provided to J.R.

During the course of the investigation Special Agent Amy obtained attendance and other records from ABC Academy. According to the ABC Academy Timecard Detail reports, J.R. attended daycare on the same dates and at the same times Wells allegedly provided services to J.R. through Acumen. ABC Academy provided information that Jaquala Robertson would drop off J.R. at daycare but she also approved Wells time entries that had overlapping times.

MFCU analysis of J.R.'s time and attendance records at ABC Academy from November 14, 2022, to August 17, 2023, compared to punch entry details provided by Acumen Fiscal Agent, revealed numerous conflicting times where Wells appeared to be claiming to provide services to Medicaid recipient J.R. while records show J.R. was attending daycare.

In addition, records obtained from Acumen Fiscal Agent contained a Regions Bank direct deposit enrollment form with Kirstan Wells' Social Security number and account number, indicating this is where Wells' paychecks were deposited. MFCU agents obtained the above-referenced account records via subpoena to Regions Bank located at 1500 Southwest Railroad Ave., Hammond, LA 70403.

MFCU analysis of Kirstan Wells' direct deposit and transaction history obtained from Regions Bank revealed several instances of direct deposits labeled "Acumen Fiscal Ag Edi Paymnts Kirstan Wells." During an interview, Wells was shown caregiver daily notes through Acumen, and she confirmed that the times shown to her were times J.R. was with her.

The following table illustrates the fraudulent claims submitted to the Medicaid program under Kirstan Wells' name as the rendering provider when in fact J.R. was actually present at ABC Daycare:

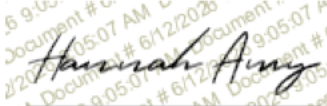
Count	Service Dates Billed to Medicaid	Fraudulent Payments
1	11/14/2022-08/17/2023	\$5,532.95
Total		\$5,532.95

Based on the above information probable cause has been shown that Wells submitted false time and notes for Medicaid services she did not provide.

Medicaid Fraud is defined under La R.S. 14:70.1 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, either presents for allowance or payment any false or fraudulent claim for furnishing services or merchandise, or knowingly submits false information in order to obtain greater compensation than that to which he is legally entitled to for furnishing services or merchandise..."

Probable cause has been shown that on 11-14-2022, through and including 08-17-2023, Kirstan Shonta Wells committed Medicaid fraud.

THEREFORE, for the above stated reasons, Affiant prays for the issuance of a Warrant of Arrest for Kirstan Shonta Wells.


Special Agent Hannah Amy
Affiant

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

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Jermaine Guillory
State of Louisiana

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WARRANT OF ARREST

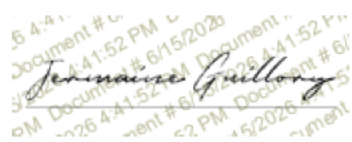
TO ANY LAW ENFORCEMENT OFFICER

Affidavit having been made by Special Agent Hannah Amy, with the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, that between 11-14-2022, through and including 08-17-2023, in the Parish of East Baton Rouge, State of Louisiana, the offender, Kirstan Shonta Wells,  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 15 day of June, 2026.


Jermaine Guillory
19th Judicial District Court
State of Louisiana