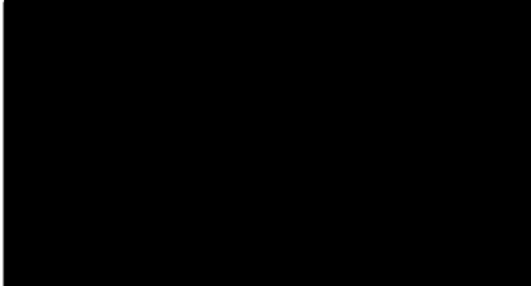


STATE OF LOUISIANA : 19TH JUDICIAL DISTRICT COURT
VERSUS : PARISH OF EAST BATON ROUGE
Tiera Green : STATE OF LOUISIANA



AFFIDAVIT

BEFORE ME, the undersigned Authority of the 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana, Special Agent Madelynn Varnado Ziebarth, 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 Tiera Green of [REDACTED] [REDACTED] did violate:

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

Between the approximate dates of 12-06-2022, through and including 05-17-2023, 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 Tiera Green 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 December 4, 2024, the Medicaid Fraud Control Unit opened an investigation on Capital Regions Care, INC (CRC) based on allegations that the Direct Service Worker (DSW) Tiera Green was purporting to provide services to Medicaid recipient J.G. while J.G. was hospitalized.

Special Agent obtained J.G.'s hospital records from Oceans Behavioral Health Hospital of Baton Rouge (OBHBR), which revealed four separate time periods of hospitalization with the following dates: December 6 through 21, 2022, January 6 through 19, 2023, March 20 through 29, 2023, and May 2 through 17, 2023.

Through investigative means, Special Agent obtained the recipient file for J.G., which included a plan of care, progress notes, hospital stays, and the employee file for Green. Special Agent conducted a telephonic interview with June Hood, the sister of J.G., who stated that Green was his worker and never came to the hospital while J.G. was inpatient and that J.G. was not allowed to have visitors because he was in the

hospital for psychiatric reasons.

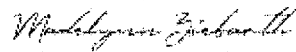
Special Agent interviewed Green. Green stated she worked for CRC in 2022 and 2023 and provided services to J.G. Special Agent had Green review copies of the progress notes for J.G. and Green recognized and acknowledged her signature. The progress notes included activities such as shaving and grocery shopping. Green initially denied clocking in to provide services while J.G. was in OBHBR. Special Agent showed Green the clock-ins, progress notes, and the admission and discharge sheet. Green admitted to clocking in to provide services to the recipient while he was hospitalized at OBHBR.

MFCU Analyst created a hospital overlap report based off the hospital admission and discharge records, progress notes, and the CRC Medicaid payments for J.G. Medicaid Fraud occurred from December 6, 2022, through May 17, 2023. The review of the records revealed numerous conflicting time and date entries between aforementioned period where she submitted the required documentation to CRC to bill Medicaid for services rendered to J.G. on dates and times when he was actually hospitalized at OBHBR. Because Green fraudulently submitted false progress notes for services she did not actually render, she directly caused CRC to present fraudulent claims to Medicaid in the amount of \$3,629.92.

Louisiana Revised Statute 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: presents for allowance or payment any false or fraudulent claim for furnishing services or merchandise, knowingly submits false information for the purpose of obtaining greater compensation than that to which he is legally entitled for furnishing services or merchandise, knowingly submits false information for the purpose of obtaining authorization for furnishing services or merchandise."

Probable cause has been shown that on 12-06-2022, through and including 05-17-2023, Tiera Green committed Medicaid fraud.

THEREFORE, for the above stated reasons, Affiant prays for the issuance of a Warrant of Arrest for Tiera Green.



Special Agent Madelynn Varnado Ziebarth
Affiant

THUS DONE AND PASSED on the 04 day of June, 2026.

Nicole Robinson

Nicole Robinson
State of Louisiana

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STATE OF LOUISIANA

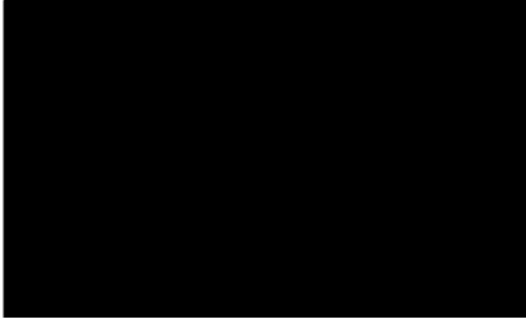
: 19TH JUDICIAL DISTRICT COURT

VERSUS

: PARISH OF EAST BATON ROUGE

Tiera Green

: STATE OF LOUISIANA



WARRANT OF ARREST

TO ANY LAW ENFORCEMENT OFFICER

Affidavit having been made by Special Agent Madelynn Varnado Ziebarth, with the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit, that between 12-06-2022, through and including 05-17-2023, in the Parish of East Baton Rouge, State of Louisiana, the offender, Tiera Green, [REDACTED] DOB 11/30/1994, 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 04 day of June, 2026.

A handwritten signature in cursive script, appearing to read "Nicole Robinson".

Nicole Robinson
19th Judicial District Court
State of Louisiana