

STATE OF LOUISIANA : 19TH JUDICIAL DISTRICT COURT

VERSUS : PARISH OF EAST BATON ROUGE

TONGIA HILL MOY : 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 Evelyn B Robinson, 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 TONGIA HILL MOY [REDACTED] [REDACTED] did violate:

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

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

between the dates of 08-26-2025, through and including 01-30-2026, in the Parish of East Baton Rouge, State of Louisiana, in that TONGIA HILL MOY 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 TONGIA HILL MOY, 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.

MEDICAID FRAUD SCHEME AND COUNTS

AFFIDAVIT

BEFORE ME, the undersigned authority personally came and appeared Evelyn Robinson, Special Agent for the Louisiana Department of Justice, Criminal Division, Medicaid Fraud Control Unit (hereinafter “MFCU”), Baton Rouge, Louisiana, who having been duly sworn, did depose and say that Tongia Hill-Moy, [REDACTED]

[REDACTED] did violate:

L.A. R. S. 14:70.1, Medicaid Fraud, two (2) counts, between the dates of 08-25-2025, through and including 1-31-2026, in the Parish of East Baton Rouge, State of Louisiana, in that Tongia Hill-Moy intentionally defrauded the 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.

On July 18, 2025, the Medicaid Fraud Control Unit opened an investigation (MFCU File #: 57-3913) involving Guidance Personal Care (“hereinafter Guidance Personal”) employee Tongia Hill-Moy, on allegations that she was billing Medicaid for services she was not rendering. The complainant, Medicaid recipient, M. S., reported to the Louisiana Department of Health hotline that Hill-Moy was his Direct Service Worker (“hereinafter DSW”) and Hill-Moy never provided services to him. Guidance Personal provides home and community-based services (hereinafter “HCBS”) to Medicaid recipients who require non-medical assistance in their homes. The Louisiana Medicaid Program then reimburses Guidance Personal for its services.

On July 30, 2025, Special Agent Robinson and Special Agent Staten met with M. S. at his residence. M. S. was advised of Agents’ identities and agreed to a recorded interview. M. S. thinks he became a client of the agency after being accepted to receive Medicaid in 2023 and stopped receiving services on December 27, 2025.

The interview with M.S. led this Agent to begin researching Hill-Moy using LaSRS (Louisiana Service Reporting System). LDH requires DSWs to utilize an Electronic Visit Verification (hereinafter “EVV”) system to clock-in and clock-out when providing HCBS services to recipients. In order to clock in or out, DSWs must login to the EVV system through a web portal on a portable device (such as a smart phone or tablet) using a username and PIN. The EVV system captures the location of the device when the DSW clocks in or out of the EVV system. EVV data and additional data (such as the name of the individual providing the service, type of service, and individual receiving the service) are maintained in a database known as the Louisiana Service Reporting System (hereinafter “LaSRS”), which is operated by an LDH contractor, Statistical Resources, Inc. (hereinafter “SRI”).

Through LaSRS Agent found a current and regularly visited client, Medicaid recipient, P. H. (Medicaid # [REDACTED]), that Hill-Moy was purportedly providing services to. Upon seeing the location of the residence, and attempting to conduct surveillance, Agent concluded that the assistance of a pole camera to be installed near the recipient’s residence was needed to conduct surveillance. On August 25, 2025, the pole camera was installed, and video surveillance began.

On October 29, 2025, the camera was removed, and the surveillance recordings/videos were downloaded and are maintained on the secure LA DOJ/MFCU network. Agent Robinson reviewed the recordings of the eighteen (18) days of surveillance, and the recordings confirmed that, though Hill-Moy billed Medicaid for those days, that services were not provided by Hill-Moy to P. H. Hill-Moy can be seen in multiple video recordings driving past the residence at the time of her clock-ins/outs using LaSRS. There were some days that Hill-Moy or her vehicles, a white Kia sedan and/or a black Mercedes, were not seen at or near P.H.’s residence, but LaSRS records document Hill-Moy was clocked in/out by someone in the office by the “editing” option in the LaSRS system.

Examples: August 27, 2025, a black Mercedes, 4-door passes the recipient’s residence during Hill-Moy’s clock-in time. A dark colored sedan passed the recipient’s residence during

Hill-Moy's clock-out time. Hill-Moy stated she took the recipient to the grocery store, and later she took P. H. to get something to eat. On September 7, 2025, at Hill-Moy's clock-in time, a black 4-door Mercedes passed the recipient's residence. A white 4-door sedan passed the residence at the time Hill-Moy clocked out. On this day, Hill-Moy noted in the progress notes that she took the recipient to church, cooked a meal, and cleaned the living room.

In reviewing the LaSRS data during the course of this investigation this agent was able to locate a second Medicaid recipient whom, Hill-Moy was also purportedly providing services for, W.D. Agent requested the patient files for P. H. and W. D., and the personnel file for Hill-Moy on March 18, 2026, after the pole camera surveillance was completed, due to Hill-Moy's brother owning the business and her mother being the registered agent.

On March 17, 2026, Agents Robinson and Staten went to P. H.'s residence and spoke with her and her husband, R. H. Both were advised of their rights, which they stated they understood. R. H. signed his wife's form with her approval. P. H. is blind (2 ½ years) and has a tracheostomy. Both stated Hill-Moy has never provided services for P. H. P.H. advised that a representative of Guidance Personal came by their residence to do the initial assessment (determine the number of service hours needed), and Hill-Moy came by a couple of times but never stayed. According to P. H., Hill-Moy has never provided personal care services for her. Hill only sat and talked to her, and P. H. stated it was not even an hour-long visit.

Agent Robinson then located the other Medicaid recipient whom Moy-Hill was clocking in/out for during this investigation. W. D. (Medicaid # [REDACTED]), who lives with his mother, R. C., and stepfather, E. C., was contacted and interviewed.

W. D. is paralyzed on his left side from the waist up and has no use of his left arm. W. D. began receiving long-term care services from Guidance Personal in 2024, and Hill-Moy became his DSW in 2025. Hill-Moy clocked in as W. D.'s DSW randomly, seventy-nine (79) days, from September 10, 2025, through January 31, 2026. Agent Robinson questioned the 11:00 p.m. or later clock-outs for Hill-Moy, and both R. C. and E. C. stated those clock-ins/outs did not happen. W.D. was asked if Hill-Moy provided services for him while showing him the number of times documented in a LaSRS printout. W. D. stated Hill-Moy had only been to the residence twice that he remembered. R. C. was asked if Hill-Moy was at the residence at 11:00 p.m. on any night. R.C. stated she was not going to tell a lie; Hill-Moy was not there at that time of night. R. C. has only seen her twice at her residence, and that is when Hill-Moy came by looking for W. D. E. C., a leg amputee who is home almost all the time, said he has not seen Hill-Moy at the residence and does not know what she looks like.

Agent Robinson met with W. D. again on April 7, 2026, to review his patient file that was received from Guidance Personal Care. Agent Robinson showed W. D. his alleged signature on the service logs and time sheets completed by Hill-Moy and on the application W. D. completed when he initially signed up with the provider. W. D. stated that the signature on the service logs and timesheets was not his signature.

April 7, 2026, Hill-Moy and her attorney, J. Rodney Pierre, came to the MFCU office for an interview. Hill-Moy was advised of her rights per a rights waiver form, for which she agreed

and signed. During the interview Agents questioned Hill-Moy about the services she was purported to provide for P.H. and W.D. Hill-Moy stated she provided services to both Medicaid recipients, P. H. and W. D., despite being shown LaSRS printouts and still images from the pole camera footage to the contrary.

Hill-Moy's actions resulted in the submission of false claims by Guidance Personal to the Louisiana Medicaid Program for payment. Specifically, Hill-Moy submitted false or fraudulent documentation in the form of time sheets & service logs to obtain payment to which she was not legally entitled, for dates, times, and services she did not perform for either Medicaid recipient: P.H., from August 26, 2025, through and including October 29, 2025, total monetary loss to the Medicaid Program as a result of Hill-Moy's submission of false time sheets and service logs for services that were not actually rendered to P.H. for these dates of services is **\$3,393.79** (Medicaid billing during pole camera surveillance period only), and W.D., from September 10, 2025, through and including January 30, 2026, total monetary loss to the Medicaid Program as a result of Hill-Moy's submission of false time sheets and service logs for services that were not actually rendered to W.D. for these dates of services is **\$5,824.54**. The total fraudulent billing billed to and paid by Medicaid is **\$9,218.33**.

Under La. R.S. 14:70.1, the crime of Medicaid fraud is 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 that 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.

Thus, Affiant sets forth that probable cause has been established that Tongia Hill-Moy committed the offense of Medicaid fraud, two (2) counts, in violation of LA R.S. 14:70.1. in that, as it relates to P.H. from August 26, 2025, through and including October 29, 2025, and, and it relates to W.D. from September 10, 2025, through and including January 30, 2026, Tongia Hill-Moy committed Medicaid fraud (2) counts.

Probable cause has been shown that on 08-26-2025, through and including 01-30-2026, TONGIA HILL MOY committed Medicaid fraud.

THEREFORE, for the above stated reasons, Affiant prays for the issuance of a Warrant of Arrest for TONGIA HILL MOY

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Special Agent Evelyn B Robinson
Affiant

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

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Jermaine Guillory
State of Louisiana

: 19TH JUDICIAL DISTRICT COURT

: PARISH OF EAST BATON ROUGE

: STATE OF LOUISIANA

TO ANY LAW ENFORCEMENT OFFICER

did commit the crime(s) of:

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

Given under my official signature, this 18 day of June, 2026.

Jermaine Guillory
19th Judicial District Court
State of Louisiana