

INDICTMENT

THE STATE OF MISSISSIPPI

CIRCUIT COURT

COUNTY OF MADISON

____ TERM, ____
No. 26-240

WIRE FRAUD (1 COUNT)

Section 97-19-83(1), Miss. Code of 1972, as amended

FILED
MADISON COUNTY

JUN 10 2026

MEDICAID FRAUD (1 COUNT)

Section 4-13-213, Miss. Code of 1972, as amended

ANITA WILKINSON, CIRCUIT CLERK

BY AW

D.C.

The GRAND JURORS of the State of Mississippi, taken from the body of the good and lawful citizens of Madison County, Mississippi, being duly selected, impaneled, sworn and charged in the Circuit Court of Madison County, Mississippi, Circuit Court District #20, upon their oaths, present that:

SHAWNCEE VASSAR-CUNNINGHAM

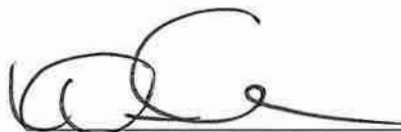
COUNT I

in Madison County, Mississippi and elsewhere, within a period of time from on or about December, 2019, through on or about November, 2020, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money, property, or services, or personal advantage by means of materially false or fraudulent pretenses, representations, or promises, for the purpose of executing such scheme or artifice or attempting so to do, transmitted or caused to be transmitted by mail, telephone, newspaper, radio, television, wire, electromagnetic waves, microwaves, or other means of communication or by person, any writings, signs, signals, pictures, sounds, data, or other matter across county or state jurisdictional lines, to wit: Shawncee Vassar-Cunningham, d/b/a Reliant Home Care, LLC, having devised a scheme to defraud, or to obtain money by means of materially false or fraudulent pretenses, representations or promises, submitted false or fraudulent claims for payment to the Mississippi Division of Medicaid falsely and fraudulently claiming that the services to the beneficiary were provided by a Registered Nurse, when in truth and in fact, as she then well knew, the services were provided by a Licensed Practical Nurse, which is impermissible per the regulations and practices of the Division of Medicaid and would not be compensable, being transmitted electronically or by other means of communication across county or state jurisdictional lines, in direct violation of § 97-19-83(1) of the *Mississippi Code of 1972, Annotated*, as amended, contrary to the statute in such cases made and provided, and against the peace and dignity of the State of Mississippi.

COUNT II

Based on a series of acts connected together and constituting parts of a common scheme or plan, in Madison County, Mississippi and elsewhere, within a period of time from December, 2019, through on or about November, 2020, did willfully, unlawfully, and feloniously make, present, and cause to be made and presented false, fictitious, or fraudulent claims for Medicaid benefits for service dates and times, knowing the claims to be false, fictitious, or fraudulent, in that Shawncee Vassar-Cunningham, d/b/a Reliant Home Care, LLC, submitted materially false and fraudulent claims to the Mississippi Division of Medicaid misrepresenting that the services to the beneficiary were provided by a Registered Nurse, when in truth and in fact, as she then well knew, the services were provided by a Licensed Practical Nurse, which is impermissible per the regulations and practices of the Division of Medicaid and would not be compensable, in violation of § 43-13-213 of the *Mississippi Code of 1972, Annotated*, as amended, contrary to the statute in such cases made and provided, and against the peace and dignity of the State of Mississippi.

A TRUE BILL



William C. Lamar
Special Assistant Attorney General
550 High Street
Jackson, MS 39201


Grand Jury Foreman

AFFIDAVIT

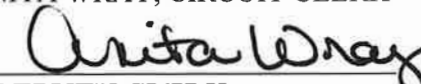
COMES NOW London Bullock, Foreman of the aforesaid Grand Jury, and makes oath that this indictment presented to this Court was concurred in by twelve (12) or more members of the Grand Jury and at least fifteen (15) members thereof were present during all deliberations.


FOREMAN OF THE GRAND JURY

SWORN TO AND SUBSCRIBED before me on this, the 27 day of May, 2026.



ANITA WRAY, CIRCUIT CLERK

BY: 
DEPUTY CLERK