

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Andrea Thomas, in violation of Section 191.905.1 RSMo, committed the class D felony of False Statement to Receive a Health Care Payment: to knowingly make or cause to be made a false statement or false representation of a material fact in order to receive a health care payment, punishable upon conviction under Sections 558.011, 558.002, and 191.905.12, RSMo, in that: on or about April 18, 2023, through April 9, 2025, in the County of Cole, State of Missouri, the defendant as a Personal Care Attendant (PCA) in the Missouri Medicaid Consumer-Directed Services (CDS) program, was a health care provider who knowingly caused false representations to be made to the Missouri Medicaid Program (MO HealthNet), a health care payer, for the purpose of receiving health care payments, to wit: that defendant was providing in-home personal care services to Medicaid recipient K.T. as indicated by Electronic Visit Verification (EVV) time records defendant submitted to Provision Home Care (Provision) for one hundred and five (105) dates of services, which in turn were used

by Provision as the basis for billing Medicaid from May 3, 2023, through May 28, 2025, all of which were false representations of material fact known by the defendant to be false when made, as K.T. was admitted in-patient at various times during the false dates of service at Christian Hospital, Specialty Select Hospital St. Louis, SSM Health DePaul Hospital, Kindred Hospital, and Mercy Hospital, and could not receive in-home personal care services as defendant claimed. The false dates of services fraudulently claimed by the defendant occurred between April 18, 2023, and April 9, 2025. Medicaid paid for the false claims on May 19, June 23, July 7, November 3, 17, 2023, July 19, August 23, October 25, 2024, January 10, 24, February 7, March 7, April 11, May 23, June 13, 2025. The total loss to Missouri Medicaid for this scheme is \$18,679.58.

COUNT: II

Charge Code: 570.030-035Y20202399.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Ameasha Poindexter, in violation Section 570.030 RSMo, committed the class D felony of Stealing by Deceit: appropriates property or services of another with the purpose to deprive him or her thereof, either without his or her consent or by means of deceit or coercion, punishable upon conviction under Sections 558.011 and 558.002 RSMo in that: on or about April 18, 2023, through June 13, 2025, in the County of Cole, State of Missouri, the defendant stole Missouri Medicaid money from MO HealthNet by deceit. Specifically, defendant made false representations to MO HealthNet when defendant knew such representations were false, causing MO HealthNet to rely upon the false representations and thereby inducing MO HealthNet to part with payments that the defendant then took, intending to withhold such payments from MO HealthNet permanently, and the payments had a combined value of at least seven hundred and fifty dollars (\$750.00).

### Ranges of Punishment

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

The range of punishment for violating Section 191.905 shall be a civil penalty of not less than five thousand dollars (\$5,000) and not more than ten thousand dollars (\$10,000) for each separate act in violation of Section 191.905(1)—(3), plus three times the amount of damages which the state and federal government sustained because of the act of that person.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.



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Wm. Locke Thompson #68437  
Prosecuting Attorney

#### **Case Assigned to:**

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Received and filed this \_\_\_\_\_ day of \_\_\_\_\_, 2026, and bail is set  
at \_\_\_\_\_.

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Circuit Judge

SO ORDERED.