

IN THE CIRCUIT OF COLE COUNTY, MISSOURI
DIVISION ____

STATE OF MISSOURI,

Plaintiff

v.

MICHELLE TERRY

DOB: [REDACTED]

SSN: XXX-XX [REDACTED]

Defendant

No:

OCN:

FELONY COMPLAINT

COUNT: I

Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Michelle Terry, 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, 588.002, and 191.905.12, RSMo, in that: on or about January 3, 2023, through August 30, 2024, in the County of Cole, State of Missouri, the defendant as the owner of Destiny Adult Daycare Center LLC (Destiny), 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 purposes of receiving health care payments, to wit: that C.F., K.F., J.H., and R.O., four Medicaid recipients, were attending and receiving care from Destiny on nine hundred and fifty three (953) dates of service, all of which were false representations of material fact known by the defendant to be false when made, as neither C.F., K.F., J.H., and R.O. were actually

physically at Destiny during any date of service the defendant billed. Destiny billed Medicaid on the basis of these false dates of service from May 11, 2023, through August 30, 2024. Medicaid paid for the false claims on May 19, June 23, July 7, 19, August 4, 18, September 8, 22, October 6, 18, November 3, 17, December 8, 22, 2023, January 12, 26, February 9, 23, March 8, 19, April 5, 25, May 10, 24, June 7, 18, July 5, 19, August 9, 23, September 13, 2024. The total loss to Missouri Medicaid for this scheme is \$114,480.32.

COUNT: II

Charge Code: 570.030-034Y20232399.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Michelle Terry, in violation Section 570.030 RSMo, committed the class C 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 January 3, 2023, through September 13, 2024, 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 twenty-five thousand dollars (\$25,000).

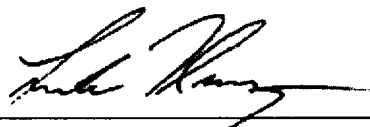
Ranges of Punishment

The range of punishment for a class C felony conviction is imprisonment in the custody of the Missouri Department of Corrections for a term of not less than three (3) years but not to exceed ten (10) years; and up to a ten thousand dollar (\$10,000) fine, or twice the amount of the offender's financial gain.

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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Prosecuting Attorney

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

Circuit Judge

SO ORDERED.