

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Sandra Wilkes, acting alone or in concert with another, 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: from December 1, 2024, through February 28, 2025, in the County of Cole, State of Missouri, the defendant as a co-owner of Smiles Adult Day Care Center, LLC (Smiles), 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 services, to wit: that eighteen (18) Medicaid recipients were attending and receiving adult day care services from Smiles on fifty-two (52) dates of service, all of which were false representations of material fact known by the defendant to be false when made, as Smiles was closed for business

from December 1, 2024, through February 28, 2025, and did not provide any services to Medicaid recipients. The dates of service fraudulently claimed by the defendant were from December 1, 2024, through February 28, 2025. Medicaid paid for the false claims on December 13, 27, 2024, January 10, 24, and February 7, 28, 2025. The total loss to Missouri Medicaid for this scheme is \$66,492.96.

COUNT: II

Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Sandra Wilkes, acting alone or in concert with another, 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: from December 1, 2024, through March 30, 2026, in the County of Cole, State of Missouri, the defendant as a co-owner of Smiles Adult Day Care Center, LLC (Smiles), 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 services, to wit: that twenty (20) Medicaid recipients were attending and receiving adult day care services from Smiles on sixty-six (66) dates of service, all of which were false representations of material fact known by the defendant to be false when made, as Smiles was closed for business on every Monday from December 1, 2024, through March 30, 2026, and did not provide any services to Medicaid recipients. The dates of service fraudulently claimed by the defendant were from December 1, 2024, through March 23, 2026. Medicaid paid for the false claims on December 13, 27, 2024, January 10, 24, February 7, 28, March 14, 28, April 11, 25, May 16, 30, June 13, 27, July 11, 25, August 15, 29, September 12, 26, October 10, 24, November 14, 28, December 12, 26, 2025, January 9, 23, February 6, 27, and March 27, 2026. The total loss to Missouri Medicaid for this scheme is \$54,869.24.

COUNT: III

Charge Code: 570.030-034Y20232399.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Sandra Wilkes, acting alone or in concert with another, 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 December 1, 2024, through March 27, 2026, 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

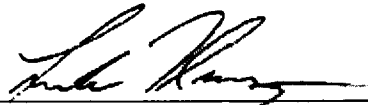
The range of punishment for a class C felony conviction is imprisonment in the custody of the Missouri Department of Corrections for a term of not less than three (3) years but not to exceed ten (10) years; and up to a ten thousand dollar (\$10,000) fine, or twice the amount of the offender's financial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



Wm. Locke Thompson #68437
Prosecuting Attorney

Case Assigned to:

Arvids V. Petersons #48370
Assistant Attorney General
Missouri Attorney General's Office
221 West High Street
Jefferson City, MO 65101
P: 573-751-7192
Email: Arvids.Petersons@ago.mo.gov

John M. McKenzie #71068
Assistant Attorney General
Missouri Attorney General's Office
221 West High Street
Jefferson City, MO 65101
P: 573-751-7192
Email: John.McKenzie@ago.mo.gov

Lucas Chapman #76575
Assistant Attorney General
Missouri Attorney General's Office
221 West High Street
Jefferson City, MO 65101
P: 573-751-7192
Email: Lucas.Chapman@ago.mo.gov

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

Circuit Judge

SO ORDERED.