

IN THE CIRCUIT OF COLE COUNTY, MISSOURI
DIVISION ____

STATE OF MISSOURI,	)	
	)	
	)	
v.	)	No:
	)	OCN:
	)	
YOLANDA SIMMONS	)	
	)	
	)	
DOB: 	)	
SSN: XXX-XX- 	)	
	)	
	)	

Defendant.)

FELONY COMPLAINT

COUNT: I

Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Yolanda Simmons, acting alone or in concert with one 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: on or about March 6, 2022, through February 7, 2025, in the County of Cole, State of Missouri, the defendant as a Personal Care Attendant (PCA) in the Missouri 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 purposes of receiving health care payments, to wit: that Yolanda Simmons was providing in-home personal care services to Medicaid recipient Chiquita Perry, as indicated by Electronic Visit

Verification (EVV) time records submitted to Elite Home Health Care (Elite) for six hundred and twenty seven (627) false dates of services, which in turn were used by Elite as the basis for billing Medicaid from March 17, 2022, through June 6, 2024, all of which were false representations of material fact known by the defendant to be false when made, as Chiquita Perry was working for General Motors, and Yolanda Simmons was working at Biome Education Group and Bethesda Lutheran Communities, and could not have provided in-home personal care services while either Chiquita Perry or Yolanda Simmons were physically present at work. The dates of service fraudulently claimed by the defendant were from March 6 through June 30, 2022, July 2 through July 30, 2022, August 1 through December 10, 2022, January 1 through June 30, 2023, July 2 through December 30, 2023, January 1 through May 31, 2024. Medicaid paid for the false claims on April 8, 18, May 6, 24, June 10, 24, July 7, 22, August 5, 19, September 9, 23, October 7, 19, November 4, 18, December 9, 23, 2022, January 6, February 3, 17, March 3, 24, April 6, 19, May 5, 19, June 9, 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 25, May 10, 24, June 7, 18, October 11, 2024, February 7, 2025. The total loss to Missouri Medicaid for this scheme is \$51,798.77.

COUNT: II

Charge Code: 570.030-035Y20202399.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Yolanda Simmons, 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 March 6, 2022, through February 7, 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 (\$25,000).

Ranges of Punishment

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000.000); 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 (\$20,000.00)

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:

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

Circuit Judge

SO ORDERED.