

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF: YORK



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 19-2-01
MDJ: Hon. Barry Bloss
Address: 3568 Concord Road
York, Pennsylvania 17402
Telephone: (717) 840-7233

DEFENDANT:

(NAME and ADDRESS):

Jennifer

Kawahl

Coleman

First Name

Middle Name

Last Name

Gen.

[REDACTED], York, Pennsylvania 17402

NCIC Extradition Code Type

- | | | | |
|---|---|--|--|
| ☐ 1-Felony Full | ☐ 5-Felony Pend. | ☐ C-Misdemeanor Surrounding States | ☐ Distance: _____ |
| ☐ 2-Felony Ltd. | ☐ 6-Felony Pend. Extradition Determ. | ☐ D-Misdemeanor No Extradition | |
| ☒ 3-Felony Surrounding States | ☐ A-Misdemeanor Full | ☐ E-Misdemeanor Pending | |
| ☐ 4-Felony No Ext. | ☐ B-Misdemeanor Limited | ☐ F-Misdemeanor Pending Extradition Determ. | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-356-26</u>	Date Filed <u>06/16/ 2026</u>	OTN/LiveScan Number <u>51020014-2</u>	Complaint Number <u>MF1230324116F</u>	Incident Number <u>MF1230324116F</u>	Request Lab Services? ☐ YES ☐ NO
GENDER ☐ Male ☒ Female	DOB [REDACTED]	POB [REDACTED]	Add'l DOB / /	Co-Defendant(s) ☒ Gen.	
First Name Middle Name Last Name					
AKA					
RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown	ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown				
HAIR COLOR ☐ GRY (Gray) ☐ RED (Red/Aubn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☐ BRO (Brown) ☐ BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN (Green) ☐ PNK (Pink) ☒ BLN (Blonde / Strawberry)					
EYE COLOR ☐ BLK (Black) ☒ BLU (Blue) ☐ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray) ☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)					
DNA ☐ YES ☐ NO	DNA Location				WEIGHT (lbs.) 195
FBI Number [REDACTED]	MNU Number				Ft. HEIGHT In. 5' 5"
Defendant Fingerprinted ☐ YES ☐ NO	Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat ☐	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. ☐	School Veh. ☐	Oth. NCIC Veh. Code	Reg. same as Def. ☐
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

Christopher R. Sherwood, AIC

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, Ryan S. King, Special Agent
(Name of the Affiant)

Badge #104

(PSP/MPOTC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General
(Identify Department or Agency Represented and Political Subdivision)
do hereby state: (check appropriate box)

PA0222400

(Police Agency ORI Number)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have
therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [227] [REDACTED]

(Subdivision Code) (Place-Political Subdivision)

York, Pennsylvania 17402

in YORK County

[67]

(County Code)

on or about January 9, 2024 to February 8, 2024

(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-356-26	Date Filed: 06/16/2026	OTN/LiveScan Number 51020014-2	Complaint Number MF1230324116F	Incident Number MF1230324116F
Defendant Name	First: Jennifer	Middle: Kawahi	Last: Coleman	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☒	1	1407	(A)(1)	of the	Title 62	1	F3	2699	26A
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			☐ Interstate	☐ Safety Zone		☐ Work Zone	
Statute Description (include the name of statute or ordinance): MEDICAID FRAUD - SUBMISSION OF FALSE INFORMATION									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally causing false or fraudulent claims to be submitted for furnishing services under Medical Assistance and/or knowingly submitting or causing to be submitted false information for the purpose of obtaining greater compensation than that to which he was legally entitled for furnishing services under Medical Assistance.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	2	1407	(A)(4)	of the	Title 62	1	F3	2699	26A
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			☐ Interstate	☐ Safety Zone		☐ Work Zone	
Statute Description (include the name of statute or ordinance): MEDICAID FRAUD - SERVICES NOT RENDERED									
Acts of the accused associated with this Offense: One continuous count of knowingly or intentionally submitting, or causing to be submitted, a claim for services which were not rendered to a recipient under Medical Assistance.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	3	1407	(A)(12)	of the	Title 62	1	F3	2699	26A
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			☐ Interstate	☐ Safety Zone		☐ Work Zone	
Statute Description (include the name of statute or ordinance): MEDICAID FRAUD - CONSPIRACY									
Acts of the accused associated with this Offense: One continuous count of entering into an agreement, combination, or conspiracy to obtain or aid another to obtain reimbursement or payments for which there is not entitlement.									



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Docket Number: CR-356-26	Date Filed: 06/16/2026	OTN/LiveScan Number 51020014-2	Complaint Number MF1230324116F	Incident Number MF1230324116F
Defendant Name	First: Jennifer	Middle: Kawahi	Last: Coleman	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	4	3922	(A)(1)	of the	Title 18	1	F3	2699	26A
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number				☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION									
Acts of the accused associated with this Offense: One continuous count of intentionally obtaining or withholding property of another by creating or reinforcing a false impression, including false impressions as to law, value, intention, or other state of mind causing the theft of Medical Assistance funds of greater than \$2,000.00.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☒ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	5	3922	(A)(1)	of the	Title 18	1	F3	2699	26A
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number				☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION									
Acts of the accused associated with this Offense: One continuous count of intentionally obtaining or withholding property of another by creating or reinforcing a false impression, including false impressions as to law, value, intention, or other state of mind causing the theft of Medical Assistance funds of greater than \$2,000.00.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number				☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									

POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-356-26</u>	Date Filed: 06/16/2026	OTN/LiveScan Number <u>S1020014-2</u>	Complaint Number MFI230324116F	Incident Number MFI230324116F
Defendant Name	First: Jennifer	Middle: Kawahi	Last: Coleman	

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
4. This complaint consists of the preceding page(s) numbered 1 through 3.
5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) 6/16 2026
(Year)

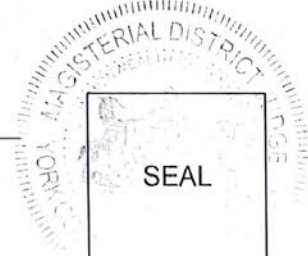
(Signature of Affiant)

AND NOW, on this date June 16, 2026 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

19-2-01
(Magisterial District Court Number)

B.L.B. East
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR-356-26	Date Filed: 06/16/2026	OTN/LiveScan Number 51020014-2	Complaint Number MF1230324-116F	Incident Number MF1230324-116F
Defendant Name	First: JENNIFER	Middle: KAWAHI	Last: COLEMAN	

AFFIDAVIT of PROBABLE CAUSE

1. Your Affiant is Special Agent Ryan S. King, Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, Medicaid Fraud Control Section, located in Harrisburg, Pennsylvania. Your Affiant is a law enforcement officer and as such, your Affiant is authorized to apply for, obtain, and serve search warrants, make seizures, and effectuate arrests. This Affidavit is based upon an analysis of the documentation obtained during the course of the investigation, interview of the Defendants, and investigative work conducted by your Affiant.
2. Your Affiant was assigned to investigate allegations of Medicaid Fraud committed by Samantha Hall, following a referral submitted by UPMC through the Pennsylvania Department of Human Services (DHS). Specifically, UPMC alleged that Hall submitted claims through Red Lion Home Care (RLHC) for attendant care services that were not provided as indicated.
3. The Defendants are Samantha Hall (Hall) and Jennifer Coleman (Coleman). Hall, who currently resides at 828 Florida Avenue, York, Pennsylvania 17404, was employed by RLHC as a Personal Care Attendant (PCA) to provide attendant care services to Coleman, a Medical Assistance recipient and consumer residing at [REDACTED] York, Pennsylvania 17402. RLHC is a Medical Assistance provider and attendant care agency located in Ardmore, Pennsylvania. As the consumer, Coleman was approved to receive attendant care services through the Attendant Care Waiver Program and, more recently, through the Community HealthChoices Waiver Program (CHC Waiver).
4. According to DHS, the purpose of the CHC Waiver is to provide services, such as attendant care services, to qualifying individuals with severe physical disabilities who are twenty-one years of age or older. Eligible participants are individuals who require long-term services and supports through Medical Assistance due to limitations in performing activities of daily living. These services, which are provided in the consumer's home, help to provide an alternative to institutionalization by enabling the consumer to live as independently as possible within the community. Attendant care services may include tasks such as assisting the consumer with transferring, bathing, dressing, toileting, meal preparation, laundry, and light housekeeping. Consumers are authorized to receive a certain number of service hours per week based upon individualized assessments and service plans.

The CHC Waiver requires consumers to select a Managed Care Organization (MCO) to administer their Medical Assistance benefits. MCOs contract with the Commonwealth of Pennsylvania to coordinate Medical Assistance services and process payments from the Medical Assistance program for attendant care services. Attendant care agencies submit claims to the MCOs, which are then reviewed, and payments are issued to the agencies. Coleman was enrolled with UPMC as her MCO.
5. Under the CHC Waiver, attendant care agencies are responsible for coordinating services and employing and paying PCAs for services rendered to consumers. RLHC was the Medical Assistance provider who served in this capacity for the services provided to Coleman. As the Medical Assistance provider, RLHC employed Hall and was responsible for the handling of payroll in relation to the services Hall was expected to provide Coleman. Hall was hired by RLHC on or about April 5, 2021.
6. According to RLHC, PCAs providing services under the CHC Waiver are required to accurately document the dates and times during which attendant care services are provided. Effective January 1, 2020, federal regulations required that all timekeeping records be submitted electronically through the Electronic Visit Verification (EVV) system. RLHC permits PCAs to submit EVV records through either a telephony system or mobile application. The telephony system requires PCAs to call into the agency at the beginning and end of each scheduled shift to report the dates and times services were provided. The mobile application requires PCAs to log into a secure account using a unique username and password on an internet-



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Defendant Name	First: JENNIFER	Middle: KAWAHI	Last: COLEMAN	

AFFIDAVIT of PROBABLE CAUSE

connected mobile device to report the dates and times services were provided. In situations where a PCA fails to clock-in or clock-out as scheduled, RLHC may manually enter EVV records after receiving verification from the consumer confirming that services were provided as directed. RLHC relies upon the EVV records submitted by PCAs to electronically bill MCOs, and, in turn, receive reimbursement with Medical Assistance funds. Hall was paid by RLHC based upon the hours she reported as having worked.

7. On November 15, 2021, Coleman signed a RLHC "Patient Service Agreement and Consent for Care," acknowledging and agreeing that "Red Lion caregivers are required to both sign in and sign out of all work shifts via Red Lion's electronic verification system. I agree and acknowledge that EVV forms the basis of weekly billing and caregiver payroll for services rendered. EVV verifies the location of caregivers along with the start and completion of their shifts."

8. At the approximate time of hire, Hall received a RLHC "Employee Handbook" which contains a clause under subsection "Attendance and Punctuality" that, "If you are going to be late to a shift, you must report the lateness at least 4 hours prior to the start of your shift." Furthermore, subsection "Electronic Visit Verification (EVV)" contains a clause which states, "The EVV system is how we [RLHC] validate that a caregiver has worked their assigned shift."

9. Your Affiant obtained and reviewed records from RLHC reflecting the dates and times Hall claimed to have worked. Your Affiant deployed covert surveillance cameras to record activity along the [REDACTED] York, Pennsylvania. Your Affiant identified thirty-one dates of service between January 9, 2024, and February 8, 2024, in which the Defendants caused claims to be submitted and Hall to be paid for attendant care services purportedly provided to Coleman, despite surveillance footage showing that Hall was not present at Coleman's residence during the billed service times.

As a result, Hall received payment for those hours, totaling no less than 361.75 hours, when according to the surveillance footage, she was not present at Coleman's residence and therefore unable to provide attendant care services. The submission of these false claims caused UPMC to issue Medical Assistance-funded payments in excess of \$7,307.35 for services that were not provided to Coleman as represented.

10. On February 12, 2024, your Affiant and Special Agent Brian Roby (SA Roby) interviewed Hall. Hall confirmed that she was employed by RLHC to provide attendant care services to Coleman and that she was scheduled to provide care from 7:00 a.m. to 7:00 p.m. daily. Hall admitted that although RLHC expected her to follow the schedule, she typically did not arrive until approximately 10:00 a.m. or later and would leave prior to the end of her scheduled shift. Hall further advised that she was familiar with RLHC's clock-in and clock-out procedures and understood that she was only permitted to document the hours she actually worked. Hall stated that she was paid based solely upon the number of hours she documented as having worked. When confronted with discrepancies between the hours documented and the hours actually worked, Hall admitted that she had not worked the number of hours reported and stated that she was only present at Coleman's residence "when she [Coleman] wants me."

Hall further stated that Coleman was aware that Hall was being paid for hours not actually worked. Hall additionally disclosed that Coleman had recently traveled to Utah without Hall and that Coleman had clocked-in and clocked-out for Hall during that period. Hall also admitted that she and Coleman had an arrangement whereby Hall would withdraw cash from her personal bank account and provide those funds to Coleman without repayment.

11. On February 12, 2024, your Affiant and SA Roby interviewed Coleman. Coleman confirmed that she was authorized to receive twelve hours of attendant care services per day. Coleman admitted that Hall only provided a portion of the



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Defendant Name	First: JENNIFER	Middle: KAWAHI	Last: COLEMAN	

AFFIDAVIT of PROBABLE CAUSE

authorized hours. Coleman further admitted that, beginning in or around December 2023, she personally clocked-in and clocked-out for Hall despite knowing that the submitted EVV records did not accurately reflect the services provided. Coleman also admitted that she clocked-in and clocked-out for Hall while Coleman traveled to Utah between January 22, 2024, and January 27, 2024, and acknowledged that doing so "was totally wrong." Coleman further acknowledged that the false clock-in and clock-out entries resulted in payments being issued to Hall for services that were not provided. Coleman additionally admitted that she requested Hall purchase items for her without reimbursing Hall for those purchases.

12. Based upon the evidence obtained during the investigation, review of surveillance footage, EVV data analysis, and the statements made by the Defendants, your Affiant determined that the Defendants engaged in an ongoing and systematic scheme to submit and cause the submission of false claims for attendant care services that were not provided, resulting in an overpayment of Medical Assistance funds.

13. Your Affiant has probable cause to believe that, from at least January 9, 2024 through February 8, 2024, as principal accomplice or co-conspirator, the Defendants, Samantha Hall and Jennifer Coleman, knowingly submitted false information to RLHC for the purpose of obtaining greater compensation than that to which they were entitled. Specifically, the Defendants, engaged in unlawful conduct, which defrauded Medical Assistance by knowingly reporting false EVV data, which misrepresented the description of services provided, dates of service, duration of services provided, and/or the identity of the actual provider. In combination, these schemes, which created the false impression that Hall had provided services that she had not, causes a theft of no less than \$7,307.35 of Medical Assistance funds.

14. Your Affiant believes the facts contained within this affidavit are sufficient probable cause to warrant the arrest of Samantha Hall and Jennifer Coleman for the following crimes: Medicaid Fraud, 62 P.S. §1407(a)(1), (a)(4), (a)(12), and Theft by Deception, 18 Pa.C.S.A §3922(a)(1).

I, SPECIAL AGENT RYAN S. KING, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this 16th day of June, 2026
B.L.B. Land, Magisterial District Judge

My commission expires the first Monday of January, 2028

