

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF Armstrong



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number 33-3-03
MDJ Hon Honorable James Andring
Address 241 Market Street
Leechburg, PA 15656
Telephone (724) 842-3571

DEFENDANT

(NAME and ADDRESS).

Teresa Naomi Geiger
First Name Middle Name Last Name Gen
[REDACTED]
Apollo, PA 15613

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 CR 87-26 Date Filed 06/17/2026 OTN/LiveScan Number A1009907-3 Complaint Number MFI250096116F Incident Number MFI250096116F Request Lab Services? ☐ YES ☒ NO

GENDER ☐ Male ☒ Female DOB 06/17/1979 POB PA Add'l DOB / / Co-Defendant(s) ☐
First Name Middle Name Last Name Gen

RACE ☒ White ☐ Asian ☒ Black ☐ Native American ☐ Unknown
ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR ☐ GRY (Gray) ☐ RED (Red/Auburn) ☐ 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.)

FBI Number MNU Number

Defendant Fingerprinted ☐ YES ☐ NO Ft HEIGHT In

Fingerprint Classification: 5 03

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)

Deputy Attorney General Nathan Michaux
(Name of the attorney for the Commonwealth)

Nathan Michaux
(Signature of the attorney for the Commonwealth)

6/17/2026
(Date)

I, Special Agent Samuel Beucher #643
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA 0222400
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state (check appropriate box)

- 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 [210] 1682 Shady Plain Road, Apollo, PA 15613
(Subdivision Code) (Place-Political Subdivision)

in Armstrong County [03] on or about December 27, 2022 through April 14, 2023
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

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Defendant Name	First Teresa	Middle Naomi	Last Geiger	

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	62	1	F3		
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) 62 P.S. 1407 (A)(1) PROVIDER PROHIBITED ACTS									
Acts of the accused associated with this Offense On or about December 27, 2022 through April 14, 2023, the actor, Teresa Geiger, knowingly submitted false information, for the purpose of obtaining greater compensation than that to which he was legally entitled, for furnishing services or merchandise under medical assistance. Namely, the actor submitted and/or caused to be submitted timesheets and/or claims to Tempus Unlimited and AccessAbilities Inc. for services she knew were not rendered resulting in her obtaining Medicaid money to which she was not entitled in violation of 62 P.S. 1407 (A)(1).									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	2	3922	(A)(1)	of the	18 PA C.S	1	F3		
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). 18 PA C.S. 3922 (A)(1) THEFT BY DECEPTION									
Acts of the accused associated with this Offense On or about December 27, 2022 through April 14, 2023, the actor, Teresa Geiger, intentionally obtained or withheld property of another by deception. Namely, the actor, submitted and/or caused to be submitted fraudulent timesheets for services she did not render and obtained U.S. currency in amount greater than \$2,000 in violation of 18 PA C.S. 3922 (A)(1).									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	3	3925	A	of the	18 PA C.S	1	F3		
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) 18 PA C.S. (A) RECEIVING STOLEN PROPERTY									
Acts of the accused associated with this Offense. On or about December 27, 2022 through April 14, 2023, the actor, Teresa Geiger, intentionally received movable property of another, US Currency greater than \$2,000, knowing that it had been stolen in violation of 18 PA C.S. 3925 (A).									

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- 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 2.
- 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.)

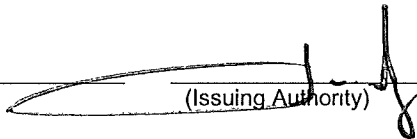
June 17th 2026
(Date) (Year)

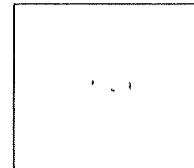

(Signature of Affiant)

AND NOW, on this date June 17, 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

33.303
(Magisterial District Court Number)


(Issuing Authority)





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AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Samuel Beucher, is employed as a Special Agent with the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations. Your Affiant is currently assigned to the Medicaid Fraud Control Section ("MFCS") in the Western Regional Office located in North Huntingdon, Pennsylvania

Your Affiant was assigned to investigate allegations that, among other things, a Direct Care Worker ("DCW") had defrauded the Pennsylvania Medical Assistance Program ("Medicaid") by causing false information to be submitted to and paid by the Pennsylvania Medicaid Program for services that Teresa GEIGER did not render to Pennsylvania Medicaid Recipients A.S and H.R..

In the course of Your Affiant's duties as a Special Agent with the MFCS, Your Affiant has become familiar with the operation of the Pennsylvania Department of Human Services ("DHS") Medicaid Program and the Medicaid reimbursement system.

The Pennsylvania Medical Assistance ("Medicaid") Program

The Pennsylvania Medical Assistance Program, also known as Medicaid, is a joint State/Federal program that purchases health care for low-income Pennsylvania residents and for those with certain disabilities. This Program is administered by the Office of Medical Assistance Programs ("OMAP") within the Pennsylvania DHS

The Medicaid Personal Care Attendant Program

Pennsylvania's Personal Care Attendant (PCA) Waiver Program provides for basic and ancillary services that enable an eligible person to remain in his/her home and community rather than being admitted to an institution, and to assist him/her in carrying out functions of daily living, self-care and mobility.

DHS Medicaid providers participating in this program receive money from the Pennsylvania Medicaid Program to pay for Personal Assistance Services (PAS) rendered by the PCAs. The Medicaid provider agencies receive Medicaid Waiver consumer-employee timesheets from individuals working as PCAs for PAS that they purportedly perform. The providers, relying on the integrity of these timesheets, then pay the PCA for the services utilizing Medicaid Program money. Tempus Unlimited is located at 600 Technology Center Drive, Stoughton, MA 02072. AccessAbilities Inc is located at 1060 Corporate Lane, Export, PA 15632

The Case against Teresa GEIGER

1. The Pennsylvania Office of Attorney General (OAG) MFCS opened an investigation involving fraudulent claims submitted by GEIGER to the Pennsylvania DHS through the Medical Assistance Program between December 27, 2022, and April 14, 2023. The allegation was provided by the Department of Human Services' Bureau of Program Integrity (BPI)



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2 In this case, UPMC is the Managed Care Organization (MCO) who acted as a financial intermediary between Medicaid public funds and the defendant. Despite the intermediary, all the money involved in this case comes from Medicaid

3. At all relevant times, GEIGER was employed by Tempus Unlimited as a Direct Care Worker (DCW) to provide PAS to Medicaid recipient A.S. Additionally, at all relevant times, GEIGER was employed by AccessAbilities Inc. as a DCW to provide PAS to Medicaid recipient H.R.

4 It was alleged that GEIGER submitted timesheets while A.S. was in an inpatient facility. It was also alleged that GEIGER submitted timesheets while H.R. was in an inpatient facility. According to GEIGER, the care for A.S. occurred at [REDACTED] Apollo, PA 15613 and the care for H.R. at [REDACTED] Apollo, PA 15613. While investigating the allegation, the fraud outlined in this affidavit was uncovered.

5. Your affiant determined that A.S. was at an inpatient facility, namely UPMC East, from December 26, 2022, to January 13, 2023.

6. It was determined that, from December 27, 2022, through January 11, 2023, GEIGER submitted 106.5 hours to Tempus Unlimited for services she could have not rendered due to A.S. being at an inpatient facility during the above time frame.

7. For example, on December 30, 2022, GEIGER billed for 15.5 hours when A.S. was admitted to UPMC East.

8 The number of fraudulent hours, 106.5 hours, was multiplied by Tempus billable rate during the above time frame to determine the total fraud loss. The MCO, UPMC, paid out approximately \$1,508.04 of Medicaid money.

9. Your affiant determined that H.R. was at an inpatient facility, namely UPMC Presbyterian Shadyside, from April 1, 2023, to April 15, 2023.

10. It was determined that, from April 3, 2023, through April 14, 2023, GEIGER submitted 89.5 hours to AccessAbilities Inc. for services she could not have rendered due to H.R. being at an inpatient facility during the above time frame.

11. For example, on April 8, 2023, GEIGER billed for 10 hours when H.R. was admitted to UPMC Presbyterian Shadyside.

12. The number of fraudulent hours, 89.5 hours, was multiplied by AccessAbilities billable rate during the above time frame to determine the total fraud loss. The MCO, UPMC, paid out approximately \$1,729.14 of Medicaid money

13 During an interview with GEIGER, she confirmed her employment as a DCW for A.S. and H.R.



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GEIGER confirmed that A.S. and H.R. had been inpatient during her employment with Tempus Unlimited and AccessAbilities Inc. GEIGER reported that she was aware she was not permitted to submit timesheets while recipients are admitted to an inpatient facility. GEIGER stated that originally, back when she worked for a previous company, she would clock in and out through a cell phone app. GEIGER stated that since cell service was spotty in her area, she was required to get a landline phone that she would use to call a provided number to clock in and out. GEIGER was given a personal code to enter after calling the provided number for the process, and only she had access to the code.

14. Your affiant obtained a fraud acknowledgment document from Tempus Unlimited that was provided to GEIGER, which explains the responsibilities for the DCW. The following was noted in the document:

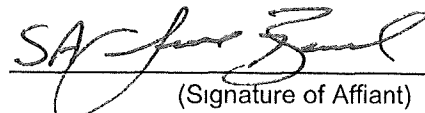
"DCW will not submit timesheets if Participant is admitted to a hospital, nursing home, rehabilitation facility or for any period for which the Participant is not eligible for waiver services."

In Summation, from December 27, 2022 through April 14, 2023, Teresa GEIGER submitted timesheets to both Tempus Unlimited and AccessAbilities Inc. while her consumers, A.S. and H.R. were in inpatient facilities. As a result, through the Managed Care Organization, UPMC, Teresa GEIGER caused a total fraud loss of approximately \$3,237.18 to the Medical Assistance Program. GEIGER received approximately \$2,429.75 in pay during the above time.

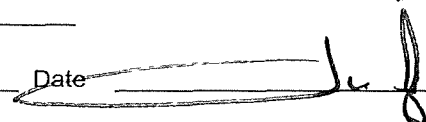
Based on the above facts, your affiant requests the following charges: (1) Count-Medicaid Fraud (Provider Prohibited Acts) (Title 62, 1407 (A)(1), Theft by Deception (Title 18, 3922 (A)(1) and Receiving Stolen Property (Title 18, 3925 (A).

I, Samuel Beucher, 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


(Signature of Affiant)

Sworn to me and subscribed before me this 17th day of June 2022

6/17/2022 Date  , Magisterial District Judge

JAMES ANDRING, MAGISTERIAL DISTRICT JUDGE
ARMSTRONG CO. PA DISTRICT COURT 33-3-03
MY COMMISSION EXPIRES 1ST MON JAN 2028



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AFFIDAVIT of PROBABLE CAUSE

My commission expires first Monday of January, 2026

JAMES ANDRING, MAGISTERIAL DISTRICT JUDGE
ARMSTRONG CO., PA DISTRICT COURT 33-3-03
MY COMMISSION EXPIRES 1ST MON JAN 2028

