

COPY

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TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

TRACEY L. WALKER,
[REDACTED]

Defendant.

NO.

26110179-32

INFORMATION

Count I: Conspiracy to Commit
Theft in the First Degree
RCW 9A.28.040 and RCW
9A.56.030(1)(a)

Count II: Theft in the First Degree
RCW 9A.56.030(1)(a)

Count III: Conspiracy to Commit
Theft in the First Degree
RCW 9A.28.040 and RCW
9A.56.030(1)(a)

Count IV: Theft in the First Degree
RCW 9A.56.030(1)(a)

Count V: Conspiracy to Commit
Theft in the First Degree
RCW 9A.28.040 and RCW
9A.56.030(1)(a)

Count VI: Theft in the First Degree
RCW 9A.56.030(1)(a)

Count VII: Solicitation to Commit
False Statement -Medicaid
RCW 74.09.230(1)

1 I, NICHOLAS W. BROWN, Attorney General for the State of Washington, with the
2 concurrence of Spokane County Prosecuting Attorney Preston McCollam pursuant to
3 RCW 43.10.232, through Assistant Attorney General Rachel Sterett, do accuse TRACEY L.
4 WALKER of the crime of CONSPIRACY TO COMMIT THEFT IN THE FIRST DEGREE
5 (CLASS C FELONY), THEFT IN THE FIRST DEGREE (CLASS B FELONY) and
6 SOLICIATION TO COMMIT MEDICAID FALSE STATEMENT (GM), committed as
7 follows:

8 **COUNT I – CONSPIRACY TO COMMIT THEFT IN THE FIRST DEGREE**

9 On, about, or between April 25, 2023 through July 24, 2023, in the County of Spokane,
10 State of Washington, the above named defendant, TRACEY L. WALKER, with intent that
11 conduct constituting the crime of Theft in the First Degree, to wit: in a series of transactions
12 which are part of a common scheme or plan, did wrongfully obtain or exert unauthorized control
13 over property or services of another, to wit: Medicaid funds, of an aggregate value exceeding
14 \$5,000, with intent to deprive such other of such property or services, did agree with one or more
15 persons to engage in or cause the performance of that crime, and any one of such persons did
16 take a substantial step in pursuance of such agreement; contrary to RCW 9A.28.040 and RCW
17 9A.56.030(1)(a).

18 **COUNT II – THEFT IN THE FIRST DEGREE**

19 On, about, or between July 24, 2023 through June 23, 2024, in the County of Spokane,
20 State of Washington, the above named defendant, TRACEY L. WALKER, in a series of
21 transactions which are part of a common scheme or plan, did wrongfully obtain or exert
22 unauthorized control over property or services of another, to wit: Medicaid funds, of an aggregate
23 value exceeding \$5,000, with intent to deprive such other of such property or services; contrary
24 to RCW 9A.56.020(1)(a)(b), RCW 9A.56.010, RCW 9A.56.030(1)(a); and/or was an
25 accomplice to the crime pursuant to RCW 9A.080.020.
26

1 **COUNT III – CONSPIRACY TO COMMIT THEFT IN THE FIRST DEGREE**

2 On or about September 15, 2023, in the County of Spokane, State of Washington, the
3 above named defendant, TRACEY L. WALKER, with intent that conduct constituting the crime
4 of Theft in the First Degree, to wit: by deception, obtaining and taking control over the property
5 or services of another or the value thereof, with intent to deprive the other person of the property
6 or services, to wit: Medicaid funds, of an aggregate value exceeding \$5,000, obtained by a series
7 of transactions which are part of a criminal episode or a common scheme or plan be performed,
8 did agree with one or more persons to engage in or cause the performance of that crime, and any
9 one of such persons did take a substantial step in pursuance of such agreement; contrary to RCW
10 9A.28.040 and RCW 9A.56.030(1)(a).

11 **COUNT IV – THEFT IN THE FIRST DEGREE**

12 On, about, or between September 15, 2023 through August 20, 2024, in the County of
13 Spokane, in the State of Washington the above named defendant, TRACEY L. WALKER, in a
14 series of transactions which are part of a common scheme or plan, did wrongfully obtain or exert
15 unauthorized control over property or services of another, to wit: Medicaid funds, of an aggregate
16 value exceeding \$5,000, with intent to deprive such other of such property or services; contrary
17 to RCW 9A.56.020(1)(a)(b), RCW 9A.56.010, RCW 9A.56.030(1)(a); and/or was an
18 accomplice to the crime pursuant to RCW 9A.080.020.

19 **COUNT V – CONSPIRACY TO COMMIT THEFT IN THE FIRST DEGREE**

20 On or about September 28, 2024 in the County of Spokane, State of Washington, the
21 above named defendant, TRACEY L. WALKER, with intent that conduct constituting the crime
22 of Theft in the First Degree, to wit: by deception, obtaining and taking control over the property
23 or services of another or the value thereof, with intent to deprive the other person of the property
24 or services, to wit: Medicaid funds, of an aggregate value exceeding \$5,000, obtained by a series
25 of transactions which are part of a criminal episode or a common scheme or plan be performed,
26 did agree with one or more persons to engage in or cause the performance of that crime, and any

1 one of such persons did take a substantial step in pursuance of such agreement; contrary to RCW
2 9A.28.040 and RCW 9A.56.030(1)(a).

3 **COUNT VI – THEFT IN THE FIRST DEGREE**

4 On, about, or between September 28, 2024 through October 30, 2025, in the County of
5 Spokane, in the State of Washington the above named defendant, TRACEY L. WALKER, in a
6 series of transactions which are part of a common scheme or plan, did wrongfully obtain or exert
7 unauthorized control over property or services of another, to wit: Medicaid funds, of an aggregate
8 value exceeding \$5,000, with intent to deprive such other of such property or services; contrary
9 to RCW 9A.56.020(1)(a)(b), RCW 9A.56.010, RCW 9A.56.030(1)(a); and/or was an
10 accomplice to the crime pursuant to RCW 9A.080.020.

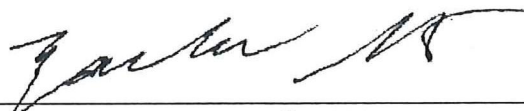
11 **COUNT VII – SOLICITATION TO COMMIT FALSE STATEMENT- MEDICAID**

12 On or about October 14, 2024, in the County of Spokane, State of Washington, the above
13 named defendant, TRACEY L. WALKER, with intent to promote or facilitate the commission
14 of False Statement – Medicaid, to wit: knowingly made or caused to be made any false statement
15 or representation of a material fact in any application for any payment under any medical care
16 program authorized under RCW 74.09, offered to give money or other thing of value to another
17 to engage in specific conduct which would constitute such crime or would establish complicity
18 of such person in its commission or attempted commission had such crime been attempted or
19 committed; contrary to RCW 9A.28.030(1) and RCW 74.09.230(1).

20 DATED this 18th day of June 2026.

21 Nicholas W. Brown
22 Attorney General

23
24 BY:


25 Rachel Sterett WSBA #27141
26 Assistant Attorney General
509-225-3873