

FILED
06-18-2026
CIRCUIT COURT
DANE COUNTY, WI
2026CF001312

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

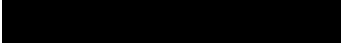
STATE OF WISCONSIN,

Plaintiff,

v.

Case No.

ZAMBIA BELL



Defendant.

CRIMINAL COMPLAINT

The Wisconsin Department of Justice, pursuant to its authority under Wis. Stat. § 49.846, files this criminal complaint against Zambia Bell (d/o/b 

The State alleges that Defendant defrauded Medicaid by submitting fraudulent timesheets to the Wisconsin Medicaid IRIS program for services not provided. Wisconsin Medicaid distributed funds to Defendant as payment because of those fraudulent timesheets.

COUNT 1: THEFT BY FRAUD

On or between approximately January 10, 2015, and April 7, 2023, in the city of Milwaukee, Milwaukee County, Wisconsin, Zambia Bell did obtain title to property of another person by intentionally deceiving the person with a false representation which is known to be false, made with intent to defraud, which did defraud the person to whom it was made, the value of which property exceeded \$10,000 but did not exceed \$100,000, belonged to the same owner, and was obtained pursuant to a single intent and design and in execution of a single deceptive scheme, contrary to Wis. Stat. §§ 943.20(1)(d), 943.20(3)(c), and 971.36(3)(a).

Pursuant to Wis. Stat. § 939.50(3)(g), upon conviction for this offense, a Class G Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than ten (10) years, or both.

COUNT 2: MEDICAL ASSISTANCE FRAUD

On or about July 26, 2022, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 3: MEDICAL ASSISTANCE FRAUD

On or about August 15, 2022, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 4: MEDICAL ASSISTANCE FRAUD

On or about September 6, 2022, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 5: MEDICAL ASSISTANCE FRAUD

On or about September 20, 2022, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 6: MEDICAL ASSISTANCE FRAUD

On or about October 11, 2022, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 7: MEDICAL ASSISTANCE FRAUD

On or about November 29, 2022, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 8: MEDICAL ASSISTANCE FRAUD

On or about January 30, 2023, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or

representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 9: MEDICAL ASSISTANCE FRAUD

On or about February 8, 2023, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 10: MEDICAL ASSISTANCE FRAUD

On or about March 1, 2023, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

COUNT 11: MEDICAL ASSISTANCE FRAUD

On or about March 15, 2023, in the city of Madison, Dane County, Wisconsin, Zambia Bell did make or cause to be made a false statement or representation of material fact in an application for a Medical Assistance benefit or payment, contrary to Wis. Stat. § 946.91(2)(a).

Pursuant to Wis. Stat. §§ 946.91(2) and 939.50(3)(h), upon conviction for this offense, a Class H Felony, the Defendant may be fined not more than \$25,000, or imprisoned not more than six (6) years, or both.

FACTUAL BASIS

I, the Complainant, am an investigator with the Wisconsin Department of Justice, Medicaid Fraud Control and Elder Abuse Unit (MFCEAU). As part of its duties, MFCEAU investigates and prosecutes civil and criminal offenses related to Medicaid providers, Medicaid recipients, and facilities that receive Medicaid funding.

I base this Complaint upon my investigation, my training and experience, my review of business and state records, and my interviews with witnesses. I believe the records I reviewed in this matter to be reliable as they are corporate, government, and/or certified records. I also believe that the witness statements are truthful and reliable.

The factual basis provided herein is only a summary of the facts learned during this investigation and is submitted for purposes of establishing probable cause for the charged offenses. This statement of facts does not necessarily contain everything known by the affiant relating to the investigation.

Based upon information and belief, I state:

Background

The Wisconsin Medical Assistance program, commonly known as Medicaid, is a joint federal and state program that provides coverage for numerous health services to qualifying indigent Wisconsin residents. One such service is the Include, Respect, I Self-Direct (IRIS) program.

The IRIS program allows qualifying participants to select their own personal care worker (PCW) and obtain services based on an allocated budget. Participants can hire PCWs themselves directly, or through a care agency. PCWs subsequently log and submit their hours through biweekly timesheets to receive payment for services rendered.

Among other qualifications, IRIS participants and PCWs agree to adhere to IRIS rules. These rules are provided to each participant each year enrolled, and the participant and PCW agree to abide by those rules each year. For example, IRIS program rules do not allow PCWs to bill for any services that are not actually provided.

Timesheets under the IRIS program are submitted biweekly, include hours worked each day, and indicate whether those hours were for Supportive Home Care (SHC) or Personal Care (PC) services. Each timesheet is required to have both the signature of the PCW reporting their time and the signature of the member.

Wisconsin Department of Health Services (DHS) contracts with agencies to help administer the IRIS program for Wisconsin residents. Two types of such

agencies are Fiscal Employer Agents (FEA) and IRIS Consultant Agencies (ICA). The member and PCW can choose which ICA and FEA to work with.

Under the IRIS program, PCWs submit biweekly timesheets to the FEA, if hired directly by the participant, or to the care agency for payment. The FEA/agency collects timesheets from PCWs and bills DHS accordingly. A PCW is not paid by DHS except through the FEA/agency, and the FEA/agency will not collect/pay money from the Medicaid program through DHS unless the PCW has submitted a timesheet.

Consulting agents regularly contact members and PCWs to ensure that services are being provided and adjust services and hours as needed.

The IRIS program is headquartered at 201 E. Washington Avenue, city of Madison, Dane County, Wisconsin. All IRIS funds are paid through this Madison office.

The IRIS program is not the only program for personal care and supportive home care services through Wisconsin Medicaid. These services can also be administered as fee-for-service through Personal Care Agencies (PCA). While there are differences between the programs, for purposes of this Complaint the services are materially similar. Most notably, the care workers submit their care hours and are paid by Wisconsin Medicaid as a result of the submitted hours. The PCAs function as the FEA and submit those care hours to Wisconsin Medicaid headquartered at 201 E. Washington Avenue, city of Madison, Dane County, Wisconsin.

Specific Allegations

Count 1 Theft by Fraud

The Medicaid Fraud Scheme

On or about December 19, 2014, Zambia Bell enrolled in the IRIS program to serve as a member's PCW. Her first claimed service occurred on January 10, 2015. By October 2021, Defendant was serving as PCW for eight total members through the IRIS and PCA (fee-for-service) programs (referred collectively herein as "the Programs").

Review of the Programs' records show that Bell elected to receive payment from Wisconsin Medicaid by direct deposit to her bank account. Review of the bank account records confirmed that this occurred at all relevant times for all members. In total, Bell was paid \$381,292.18 for services rendered through the Programs.

Further review of Bell's bank records revealed that Bell maintained other employment at Henkel Corp. ("Henkel"). Records from Henkel show that from October 4, 2021, through at least May 9, 2024, Bell served as a full-time "mixer operator." Henkel's records demonstrated that Bell's work required her to be in person and included her punch-in and punch-out times (including breaks).

Data Analyst Amber Dieter analyzed the hours Bell submitted to the Programs with the hours she worked at Henkel. Analyst Dieter determined that from March 28, 2021, through March 30, 2023, Bell's total hours worked exceeded 24 hours per day 437 times, or about 59.699% of the calendar days.

Analyst Dieter further analyzed the data to determine a “minimum fraud amount.” To do this, Analyst Dieter made every assumption to Bell’s benefit.

- Analyst Dieter assumed Bell’s Henkel hours were worked. I believe this assumption to be reliable as Bell’s Henkel job duties as a “mixer operator” required her to be physically present and absences were noted in Henkel records. Moreover, through my training and experience I am aware that it would be impossible for Bell to perform her care services while physically present at Henkel.
- Next, Analyst Dieter ensured that the highest rate of pay for Program services was counted before adding the next set of hours. For example, if Member A’s care reimbursed at \$10.00/hr. and Member B’s care reimbursed at \$15.00/hr., Analyst Dieter assumed Bell worked the hours reimbursing at \$15.00/hr., up to 24 hours, before adding Member A’s care hours.

Using this methodology, Analyst Dieter determined that Bell was paid a total of \$43,081.13 for daily care hours that exceeded 24 hours.

Notably, Analyst Dieter’s calculation assumed no sleep, travel, or other non-work time. The fraud amount increases if the assumed number of hours worked was lowered to 20 or 16 hours:

- 20 hours - \$67,083.09
- 16 hours - \$100,447.05

Analyst Dieter also determined that Bell's IRIS records show that she claimed to provide some IRIS services every single day since July 9, 2020, with about 59% of those days exceeding 20 hours a day.

As previously mentioned, Bell was paid a total of \$381,292.18. Of that, \$311,112 was paid after Bell began claiming hours exceeding 16-hour days on October 6, 2019.

Counts 2–11 Medical Assistance Fraud

On July 26, 2022, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 46.98 hours. She was paid \$497.08 for the claimed IRIS services.

On August 15, 2022, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 33.58 hours. She was paid \$311.41 for the claimed IRIS services.

On September 6, 2022, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 31.58 hours. She was paid \$311.41 for the claimed IRIS services.

On September 20, 2022, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 31.61 hours. She was paid \$311.91 for the claimed IRIS services.

On October 11, 2022, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 31.72 hours. She was paid \$313.76 for the claimed IRIS services.

On November 29, 2022, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 31.50 hours. She was paid \$310.24 for the claimed IRIS services.

On January 30, 2023, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 28.50 hours. She was paid \$273.69 for the claimed IRIS services.

On February 8, 2023, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 31.50 hours. She was paid \$317.79 for the claimed IRIS services.

On March 1, 2023, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 31.50 hours. She was paid \$320.34 for the claimed IRIS services.

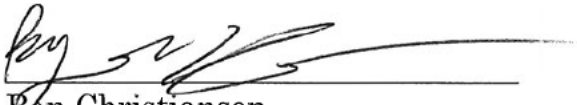
On March 15, 2023, IRIS and Henkel records show Bell submitted timesheets claiming to work a total of 31.50 hours. She was paid \$320.34 for the claimed IRIS services.

Interview of Defendant

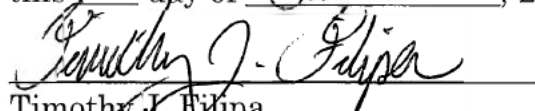
Investigator Christopher Parsons and I interviewed Bell. During the interview, Bell admitted that she was a PCW to the members. She indicated that most of her clients were family friends through her mother. When asked the maximum hours she would work on a given day, she was unable to provide a number. Bell confirmed that she worked at Henkel full time and described her hours as typically 5:45 a.m. to 2:15 p.m., Monday through Friday. We questioned

Bell as to why her total hours worked would exceed 24 hours in a day. Bell responded, "I don't know, I probably just lost track of time or something like that." Investigator Parsons asked Bell if she had seen an opportunity to make extra money by adding time here and there. Bell responded, "I probably, you know possibly put too many on there or you know mistakenly. I didn't do that on purpose."

Dated this 18th day of June, 2026.


Ben Christianson
Investigator
Medicaid Fraud Control & Elder Abuse Unit
Wisconsin Department of Justice

Subscribed and sworn to
before me and approved for filing
this 18th day of June, 2026.


Timothy J. Filipa
Assistant Attorney General
State Bar No. 1097622
Wisconsin Department of Justice