IN THE CIRCUIT OF COLE COUNTY, MISSOURI
DIVISION ___

STATE OF MISSOURI,	)	
Plaintiff,	)	
	)	
v.	)	No:
	)	OCN:
	)	
GALING PEEL [redacted]	)	
	)	
	)	
	)	
DOB: [redacted]	)	
SSN: [redacted]	)	
Defendant.	)	

FELONY COMPLAINT

COUNT: I
Charge Code: 191.905-002Y20205599.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Galing Peel, acting alone or in concert with 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 January 22, 2021, through February 22, 2025, in the County of Cole, State of Missouri, the defendant as Personal Care Attendant (PCA) in the Missouri Medicaid 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 purpose of receiving health care payments, to wit: the defendant was providing in-home personal care services to Medicaid recipient W.W. as indicated by Electronic Visit Verification (EVV) time records defendant submitted to Bootheel In Home Care Services LLC

(Bootheel) for four hundred and thirty one (431) false dates of service, which in turn were used by Bootheel as the basis for billing Medicaid from March 23, 2021, through August 29, 2024, all of which were false representations of material fact known by the defendant to be false when made, as defendant was working at other places of employment and could not have provided W.W. services as defendant claimed. The dates of service fraudulently claimed by the defendant were from January 22, 2021, through February 22, 2025. Medicaid paid for the false claims on April 9, May 28, October 22, November 12, 24, December 10, 23, 2021, January 7, 18, February 4, 18, March 4, 25, April 8, 18, May 6, 24, June 10, 24, July 7, 22, August 5, 19, September 9, 23, November 4, 18, December 9, 23, 2022, January 6, 18, February 3, March 3, April 6, 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, February 9, 23, April 25, May 10, June 7, August 23, September 13, October 11, November 8, December 13, 2024, January 10, February 7, April 11, May 23, 2025. The total loss to Missouri Medicaid for this scheme is $66,238.48.

COUNT: II
Charge Code: 570.030-034Y20232399.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that Galing Peel, 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 January 22, 2021, through May 23, 2021, 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 ($750.00).

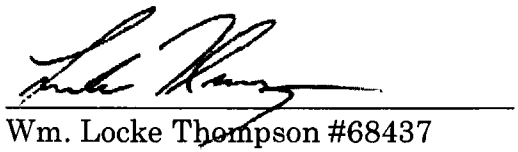
Ranges of Punishment

The range of punishment for a class C felony conviction is imprisonment in the custody of the Missouri Department of Corrections for a term of not less than three (3) years but not to exceed ten (10) years; and up to a ten thousand dollar ($10,000) fine, or twice the amount of the offender's financial gain.

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.



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

_____
Circuit Judge

SO ORDERED.