

STATE OF SOUTH DAKOTA)
: SS
COUNTY OF HUGHES)

IN CIRCUIT COURT
SIXTH JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA,

Plaintiff,

v.

SHARON LARAYE MONSON
DOB: 03/06/1977
1309 EDGEWATER DRIVE
PIERRE, SD 57501,

Defendant.

32CRI24-000042

INDICTMENT FOR:

COUNT 1:

UNLAWFULLY OBTAINING BENEFITS
OR PAYMENTS FROM MEDICAL
ASSISTANCE PROGRAM
(SDCL 22-45-2)
(CLASS 5 FELONY)

COUNT 2:

UNLAWFULLY OBTAINING BENEFITS
OR PAYMENTS FROM MEDICAL
ASSISTANCE PROGRAM
(SDCL 22-45-2)
(CLASS 5 FELONY)

COUNT 3:

UNLAWFULLY OBTAINING BENEFITS
OR PAYMENTS FROM MEDICAL
ASSISTANCE PROGRAM
(SDCL 22-45-2)
(CLASS 5 FELONY)

COUNT 4:

PERJURY TO OBTAIN STATE
BENEFITS
(SDCL 22-29-9.1 & 22-29-5)
(CLASS 6 FELONY)

COUNT 5:

FAILURE TO KEEP NECESSARY
RECORDS UPON WHICH MEDICAID
CLAIM IS BASED
(SDCL 22-45-6)
(CLASS 1 MISDEMEANOR)

THE HUGHES COUNTY GRAND JURY CHARGES:

COUNT 1

That on or about the 7th day of November, 2022, in the County of Hughes, State of South Dakota, Sharon Laraye Monson did commit the public offense of **UNLAWFULLY OBTAINING BENEFITS OR PAYMENTS FROM MEDICAL ASSISTANCE PROGRAM**, in violation of SDCL 22-45-2, a Class 5 Felony, in that she made or caused to be made a claim, knowing the claim to be false, in whole or in part, by commission or omission; to wit: the Defendant submitted claims to the South Dakota Medicaid Program for services allegedly provided to Shawn D. McDaniel on November 7, 2022, that were not actually provided;

COUNT 2

That on or about the 16th day of December, 2022, in the County of Hughes, State of South Dakota, Sharon Laraye Monson did commit the public offense of **UNLAWFULLY OBTAINING BENEFITS OR PAYMENTS FROM MEDICAL ASSISTANCE PROGRAM**, in violation of SDCL 22-45-2, a Class 5 Felony, in that she made or caused to be made a claim, knowing the claim to be false, in whole or in part, by commission or omission; to wit: the Defendant submitted claims to the South Dakota Medicaid Program for services allegedly provided to Kimberly K. Lieberman on December 16, 2022, that were not actually provided;

COUNT 3

That on or about the 1st day of January, 2023, in the County of Hughes, State of South Dakota, Sharon Laraye Monson did commit the public offense of **UNLAWFULLY OBTAINING BENEFITS OR PAYMENTS FROM MEDICAL ASSISTANCE PROGRAM**, in violation of SDCL 22-45-2, a Class 5 Felony, in that she made or caused to be made a claim, knowing the claim to be false, in whole or in part, by commission or omission; to wit: the Defendant submitted

claims to the South Dakota Medicaid Program for services allegedly provided to Amanda J. Hubbard on January 1, 2023, that were not actually provided;

COUNT 4

That on or about the 14th day of July, 2023, in the County of Hughes, State of South Dakota, Sharon Laraye Monson did commit the public offense of **PERJURY TO OBTAIN STATE BENEFITS** in violation of SDCL 22-29-9.1 and 22-29-5, a Class 6 Felony, in that she submitted any petition, application, information, or other document for the purpose of obtaining benefits or any other privilege from the State of South Dakota, that she verified the aforementioned under oath or affirmation by signing a statement, and she knew the statement to be false or untrue, in whole or in part; to wit: the Defendant submitted reports and invoices, made on affirmation, for payment to the SD Department of Human Services for services allegedly provided to David Ganske on July 14, 2023, that were not actually provided;

COUNT 5

That on or about or between the dates of the 1st day of January, 2018 and the 1st day of January, 2024, in the County of Hughes, State of South Dakota, Sharon Laraye Monson did commit the public offense of **FAILURE TO KEEP NECESSARY RECORDS UPON WHICH CLAIM IS BASED**, in violation of SDCL 22-45-6, a Class 1 Misdemeanor, in that she, having submitted a claim for or received payment for a good or a service under the Medicaid program, intentionally failed to maintain such records as are necessary to disclose fully the nature of all a good or a service for which a claim was submitted or payment was received, or such records as are necessary to disclose fully all income and expenditures upon which rates of payment were based, for a period of at least six years following the date on which payment was received;

contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Dated this 9th day of January 2024, at Pierre, South Dakota.

A True Bill
"A TRUE BILL"

THIS INDICTMENT IS MADE WITH THE CONCURRENCE OF AT LEAST SIX GRAND JURORS.

Jan D. Sans
Grand Jury Foreperson

WITNESS WHO TESTIFIED BEFORE THE GRAND JURY IN REGARD TO THIS INDICTMENT:

Special Assistant Attorney General Jeff Metzinger, South Dakota Medicaid Fraud Control Unit

Chief Auditor Ron Bugay, South Dakota Medicaid Fraud Control Unit

STATE OF SOUTH DAKOTA)
 : SS REQUEST FOR WARRANT
COUNTY OF HUGHES)

I, Mandy Miiller, prosecuting attorney in the above matter, do hereby request a Warrant be issued against the above-named Defendant.

Dated this 9th day of January, 2024.

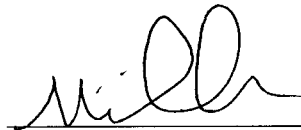
Mandy Miiller
Mandy Miiller
Assistant Attorney General

STATE OF SOUTH DAKOTA)
 : SS
COUNTY OF HUGHES)

NOTICE OF DEMAND

FOR ALIBI DEFENSE

I, Mandy Miiller, prosecuting attorney in the above matter, hereby state that the alleged offenses were committed on or about or between the dates of the 1st day of January, 2018 and the 1st day of January, 2024, at Pierre, South Dakota. I hereby request that Defendant or their attorney serve upon me a written notice of their intention to offer a defense of alibi within ten days as provided in SDCL 23A-9-1. Failure to provide such notice of an alibi defense may result in exclusion of any testimony pertaining to an alibi defense.



Mandy Miiller
Prosecuting Attorney