

SUPPRESSED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
LATASHA C. STEVENSON,)
)
Defendant.)

Criminal No. 15-30093-DRH

Title 18, United States Code
Section 1347

FILED

JUN 02 2015

INDICTMENT

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE

THE GRAND JURY CHARGES:

1. **LATASHA C. STEVENSON** defrauded the State of Illinois Medicaid Home Services Program by falsely claiming and taking payments for personal assistant services not actually performed. The State of Illinois pays a personal assistant hourly wages for performance of services for a qualified beneficiary. The qualified beneficiary must have a written Employment Agreement with the personal assistant and/or an Individual Provider Payment Policies form. The qualified beneficiary must have a Service Plan listing all services to be provided. In order for the personal assistant to receive payment from the State of Illinois, the beneficiary must submit a Home Services Program Time Sheet form listing the hours worked by the personal assistant and signed by both the beneficiary and personal assistant.
2. The Home Services Program is a Medicaid Waiver Program which is designed to provide a disabled individual who, with assistance in performing daily living activities in the home, would not require similar care in a nursing home. The Illinois Department of Human Services, Division of Rehabilitation Services (DORS) administers the program. Medicaid Waiver programs

enable states to use both state and federal Medicaid funds to pay for services related to medical care that would not ordinarily be covered under Medicaid.

3. On February 21, 2011, **STEVENSON** completed an Employment Agreement Between Customer and Personal Assistant form with a qualified Medicaid beneficiary.

4. From on or about February 28, 2011 through on or about November 15, 2012, **STEVENSON**, in furtherance of a scheme to defraud the Medicaid Home Services Program for the State of Illinois, completed Home Service Time Sheets which she falsely claimed personal assistant services for customer CF that were not provided. **STEVENSON** also falsely claimed personal assistant services while customer CF was in the hospital. **STEVENSON** signed each timesheet under the following printed statement:

I CERTIFY THE ABOVE INFORMATION IS TRUE AND THAT THE CUSTOMER WAS IN HIS/HER HOME AT THE TIME SERVICES WERE RENDERED (NOT ON VACATION, IN HOSPITAL, IN NURSING HOME, ETC.).

5. From on or about December 17, 2012 through on or about February 26, 2013, **STEVENSON**, in furtherance of a scheme to defraud the Medicaid Home Services Program for the State of Illinois, completed Home Service Program Time Sheets which she falsely claimed personal assistant services for customer CF that were not provided. **STEVENSON** also falsely claimed personal assistant services while customer CF was in the hospital. **STEVENSON** signed each timesheet under the following printed statement:

I understand falsification of any information submitted on this form could lead to criminal prosecution.

COUNT 1

Health Care Fraud

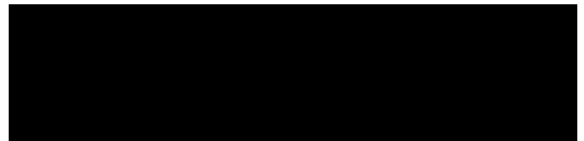
6. Paragraphs 1 through 5 are re-alleged and incorporated in Count 1.


7. From on or about February 28, 2011 through on or about February 26, 2013, in Saint Clair County, within the Southern District of Illinois,

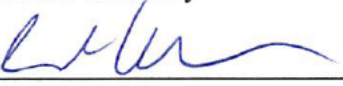
LATASHA C. STEVENSON


defendant, did knowingly and willfully execute a scheme to defraud a health care benefit program, affecting interstate commerce as defined in Title 18, United States Code, Section 24(b), namely Medicaid, in connection with the delivery of and payment for health care benefits and services by submitting time sheets and receiving payment for personal assistant services not performed, in violation of Title 18, United States Code, Section 1347.

A TRUE BILL




STEPHEN R. WIGGINTON
United States Attorney


WILLIAM E. COONAN
Assistant United States Attorney


MICHAEL HALLOCK
Assistant United States Attorney

Recommended Bond: \$5,000 unsecured