

1 IN THE DISTRICT COURT FOR THE STATE OF ALASKA  
2 THIRD JUDICIAL DISTRICT AT ANCHORAGE

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6  
7 VICTOR TABACO ALDEZA

8 DOB: 03/06/1959

9 APSIN ID: 7300102

DMV NO.: 7205337 AK

ATN: 115745418

3AN-17-\_\_\_\_\_CR

10 LOVELYEMY ALDEZA LIBAO

11 DOB: 04/09/1967

12 APSIN ID:

13 DMV NO.: 6890579 AK

ATN: 115745382

3AN-17-\_\_\_\_\_CR

14 REGINO TABACO ALDEZA

15 DOB: 01/08/1970

16 APSIN ID:

17 DMV NO.: 6986352 AK

ATN: 115745373

3AN-17-\_\_\_\_\_CR

18 ALBERT TABACO ALDEZA

19 DOB: 11/03/1976

20 APSIN ID:

21 DMV NO.: 7205336 AK

ATN: 115745409

3AN-17-\_\_\_\_\_CR

22 GEORGE LAZAGA ALDEZA

23 DOB: 10/20/1973

24 APSIN ID:

DMV NO.: 7639518 AK

ATN: 115745391

3AN-17-\_\_\_\_\_CR

25 Defendants.  
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INFORMATION

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990:

Count I - AS 11.46.600(a)(2)  
Scheme To Defraud

Victor Tabaco Aldeza - 001, Lovelyemy Aldeza Libao - 001, Regino Tabaco Aldeza - 001, Albert Tabaco Aldeza - 001, George Lazaga Aldeza - 001

Count II - AS 47.05.210(a)(1)  
Medical Assistance Fraud

Victor Tabaco Aldeza - 002, Lovelyemy Aldeza Libao - 002, Regino Tabaco Aldeza - 002, Albert Tabaco Aldeza - 002, George Lazaga Aldeza - 002

Count III - AS 47.05.210(a)(1)  
Medical Assistance Fraud

Victor Tabaco Aldeza - 003, Lovelyemy Aldeza Libao - 003, Regino Tabaco Aldeza - 003

Count IV - AS 47.05.210(a)(5)  
Medical Assistance Fraud

Victor Tabaco Aldeza - 004, Lovelyemy Aldeza Libao - 004, Regino Tabaco Aldeza - 004

Count V - AS 47.05.210(a)(1)  
Medical Assistance Fraud

Victor Tabaco Aldeza - 005, Regino Tabaco Aldeza - 005, Albert Tabaco Aldeza - 003

Count VI - AS 47.05.210(a)(5)  
Medical Assistance Fraud

Victor Tabaco Aldeza - 006, Regino Tabaco Aldeza - 006, Albert Tabaco Aldeza - 004

Count VII - AS 47.05.210(a)(1)  
Medical Assistance Fraud

Victor Tabaco Aldeza - 007, Regino Tabaco Aldeza - 007, Albert Tabaco Aldeza - 005

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Count VIII - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 008, Regino Tabaco Aldeza - 008,  
Albert Tabaco Aldeza - 006

Count IX - AS 47.05.210(a)(1)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 009, Regino Tabaco Aldeza - 009,  
Albert Tabaco Aldeza - 007

Count X - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 010, Regino Tabaco Aldeza - 010,  
Albert Tabaco Aldeza - 008

Count XI - AS 47.05.210(a)(1)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 011, Regino Tabaco Aldeza - 011,  
Albert Tabaco Aldeza - 009

Count XII - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 012, Regino Tabaco Aldeza - 012,  
Albert Tabaco Aldeza - 010

Count XIII - AS 47.05.210(a)(1)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 013, Regino Tabaco Aldeza - 013,  
Albert Tabaco Aldeza - 011

Count XIV - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 014, Regino Tabaco Aldeza - 014,  
Albert Tabaco Aldeza - 012

Count XV - AS 47.05.210(a)(1)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 015, Regino Tabaco Aldeza - 015,  
Albert Tabaco Aldeza - 013

Count XVI - AS 47.05.210(a)(5)

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Medical Assistance Fraud  
Victor Tabaco Aldeza - 016, Regino Tabaco Aldeza - 016,  
Albert Tabaco Aldeza - 014

Count XVII - AS 47.05.210(a)(1)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 017, Lovelyemy Aldeza Libao - 005,  
Regino Tabaco Aldeza - 017, Albert Tabaco Aldeza - 015

Count XVIII - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 018, Lovelyemy Aldeza Libao - 006,  
Regino Tabaco Aldeza - 018, Albert Tabaco Aldeza - 016

Count XIX - AS AS11.31.100/47.05.210(a)(1)  
Attempted Medical Assistance Fraud  
Victor Tabaco Aldeza - 019, Regino Tabaco Aldeza - 019,  
George Lazaga Aldeza - 003

Count XX - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 020, Regino Tabaco Aldeza - 020,  
George Lazaga Aldeza - 004

Count XXI - AS AS11.31.100/47.05.210(a)(1)  
Attempted Medical Assistance Fraud  
Victor Tabaco Aldeza - 021, Regino Tabaco Aldeza - 021,  
George Lazaga Aldeza - 005

Count XXII - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Victor Tabaco Aldeza - 022, Regino Tabaco Aldeza - 022,  
George Lazaga Aldeza - 006

1 THE OFFICE OF SPECIAL PROSECUTIONS CHARGES:

2 COUNT I

3 That in the Third Judicial District, State of Alaska, on or about January 1<sup>st</sup>, 2009 to  
4 March 2017, at or near Anchorage, VICTOR TABACO ALDEZA, LOVELYEMY ALDEZA  
5 LIBAO, REGINO TABACO ALDEZA, ALBERT TABACO ALDEZA, GEORGE LAZAGA  
6 ALDEZA, acting as principals and accomplices, knowingly engaged in conduct constituting a  
7 scheme to defraud one or more persons of \$10,000 or to obtain \$10,000 or more from one or  
8 more persons by false or fraudulent pretense, representation, or promise and obtained property or  
9 services in accordance with the scheme, to wit: approximately \$364,756.70 from Medicaid for  
10 PCA and respite services.

11 All of which is a Felony class B offense being contrary to and in violation of  
12 11.46.600(a)(2) and against the peace and dignity of the State of Alaska.

14 COUNT II

15 That in the Third Judicial District, State of Alaska, on or about January 1<sup>st</sup>, 2009, to  
16 March 2017, at or near Anchorage, VICTOR TABACO ALDEZA, LOVELYEMY ALDEZA  
17 LIBAO, REGINO TABACO ALDEZA, ALBERT TABACO ALDEZA, AND GEORGE  
18 LAZAGA ALDEZA, acting as principals and accomplices, knowingly submitted, or caused to be  
19 submitted in furtherance of the conspiracy, claims totaling approximately \$364,756.70 to  
20 Medicaid for PCA and respite services with reckless disregard for the fact that the conspirators  
21 were not entitled to the claims, benefits or property.

22 All of which is a Felony class B offense being contrary to and in violation of  
23 47.05.210(a)(1) and 47.05.210(b)(1) and against the peace and dignity of the State of Alaska.

COUNT III

1  
2 That in the Third Judicial District, State of Alaska, on or about Oct. 28<sup>th</sup>, 2009 to Nov.  
3 29<sup>th</sup>, 2009, at or near Anchorage, VICTOR TABACO ALDEZA, LOVELYEMY ALDEZA  
4 LIBAO, REGINO TABACO ALDEZA, acting as principals and accomplices, knowingly  
5 submitted or authorized the submission of a claim to a medical assistance agency for property,  
6 services, or a benefit with reckless disregard that the claimant is not entitled to the property,  
7 services, or benefit.

8  
9 All of which is a Felony class C offense being contrary to and in violation of  
10 47.05.210(a)(1) and 47.05.210(b)(2) and against the peace and dignity of the State of Alaska.

COUNT IV

11  
12 That in the Third Judicial District, State of Alaska, on or about Oct. 28<sup>th</sup>, 2009 to Nov.  
13 29<sup>th</sup>, 2009, at or near Anchorage, VICTOR TABACO ALDEZA, LOVELYEMY ALDEZA  
14 LIBAO, AND REGINO TABACO ALDEZA, acting as principals and accomplices, knowingly  
15 made a false entry or falsely altered a medical assistance record.

16  
17 All of which is a Misdemeanor class A offense being contrary to and in violation of  
18 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

COUNT V

19  
20 That in the Third Judicial District, State of Alaska, on or about Aug. 7<sup>th</sup>, 2010 to Sep.  
21 14<sup>th</sup>, 2010, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA,  
22 AND ALBERT TABACO ALDEZA, acting as principals and accomplices, knowingly submitted  
23 or authorized the submission of a claim to a medical assistance agency for property, services, or  
24

1 a benefit with reckless disregard that the claimant is not entitled to the property, services, or  
2 benefit.

3 All of which is a Felony class C offense being contrary to and in violation of  
4 47.05.210(a)(1) and 47.05.210(b)(2) and against the peace and dignity of the State of Alaska.

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COUNT VI

That in the Third Judicial District, State of Alaska, on or about Aug. 7<sup>th</sup>, 2010 to Sep.  
14<sup>th</sup>, 2010, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA,  
AND ALBERT TABACO ALDEZA, acting as principals and accomplices, knowingly made a  
false entry or falsely altered a medical assistance record.

All of which is a Misdemeanor class A offense being contrary to and in violation of  
47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

COUNT VII

That in the Third Judicial District, State of Alaska, on or about March 28<sup>th</sup>, 2012 to  
April 25<sup>th</sup>, 2012, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO  
ALDEZA, AND ALBERT TABACO ALDEZA, acting as principals and accomplices,  
knowingly submitted or authorized the submission of a claim to a medical assistance agency for  
property, services, or a benefit with reckless disregard that the claimant is not entitled to the  
property, services, or benefit.

All of which is a Felony class C offense being contrary to and in violation of  
47.05.210(a)(1) and 47.05.210(b)(2) and against the peace and dignity of the State of Alaska.

COUNT VIII

1  
2 That in the Third Judicial District, State of Alaska, on or about March 28<sup>th</sup>, 2012 to  
3 April 25<sup>th</sup>, 2012, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO  
4 ALDEZA, AND ALBERT TABACO ALDEZA, acting as principals and accomplices,  
5 knowingly made a false entry or falsely altered a medical assistance record.

6 All of which is a Misdemeanor class A offense being contrary to and in violation of  
7 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

COUNT IX

9  
10 That in the Third Judicial District, State of Alaska, on or about March 19<sup>th</sup>, 2013 to  
11 May 23<sup>rd</sup>, 2013, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO  
12 ALDEZA, AND ALBERT TABACO ALDEZA, acting as principals and accomplices,  
13 knowingly submitted or authorized the submission of a claim to a medical assistance agency for  
14 property, services, or a benefit with reckless disregard that the claimant is not entitled to the  
15 property, services, or benefit.

16 All of which is a Felony class C offense being contrary to and in violation of  
17 47.05.210(a)(1) and 47.05.210(b)(2) and against the peace and dignity of the State of Alaska.

COUNT X

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19  
20 That in the Third Judicial District, State of Alaska, on or about March 19<sup>th</sup>, 2013 to  
21 May 23<sup>rd</sup>, 2013, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO  
22 ALDEZA, AND ALBERT TABACO ALDEZA, acting as principals and accomplices,  
23 knowingly made a false entry or falsely altered a medical assistance record.



1 All of which is a Misdemeanor class A offense being contrary to and in violation of  
2 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

3 COUNT XI

4 That in the Third Judicial District, State of Alaska, on or about May 21<sup>st</sup>, 2014, at or  
5 near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA, AND ALBERT  
6 TABACO ALDEZA, acting as principals and accomplices, knowingly submitted or authorized  
7 the submission of a claim to a medical assistance agency for property, services, or a benefit with  
8 reckless disregard that the claimant is not entitled to the property, services, or benefit.  
9

10 All of which is a Misdemeanor class A offense being contrary to and in violation of  
11 47.05.210(a)(1) and 47.05.210(b)(3) and against the peace and dignity of the State of Alaska.

12 COUNT XII

13 That in the Third Judicial District, State of Alaska, on or about May 21<sup>st</sup>, 2014, at or  
14 near Anchorage, VICTOR TABACO ALDEZA AND REGINO TABACO ALDEZA AND  
15 ALBERT TABACO ALDEZA, acting as principals and accomplices, knowingly made a false  
16 entry or falsely altered a medical assistance record.  
17

18 All of which is a Misdemeanor class A offense being contrary to and in violation of  
19 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

20 COUNT XIII

21 That in the Third Judicial District, State of Alaska, on or about Aug. 22<sup>nd</sup>, 2014, at or  
22 near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA, AND ALBERT  
23 TABACO ALDEZA, acting as principals and accomplices, knowingly submitted or authorized  
24

1 the submission of a claim to a medical assistance agency for property, services, or a benefit with  
2 reckless disregard that the claimant is not entitled to the property, services, or benefit.

3 All of which is a Misdemeanor class A offense being contrary to and in violation of  
4 47.05.210(a)(1) and 47.05.210(b)(3) and against the peace and dignity of the State of Alaska.

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COUNT XIV

That in the Third Judicial District, State of Alaska, on or about Aug. 22<sup>nd</sup>, 2014, at or  
near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA, AND ALBERT  
TABACO ALDEZA, acting as principals and accomplices, knowingly made a false entry or  
falsely altered a medical assistance record.

All of which is a Misdemeanor class A offense being contrary to and in violation of  
47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

COUNT XV

That in the Third Judicial District, State of Alaska, on or about Feb. 17<sup>th</sup>, 2015 to Oct.  
9<sup>th</sup>, 2015, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA,  
AND ALBERT TABACO ALDEZA, acting as principals and accomplices, knowingly submitted  
or authorized the submission of a claim to a medical assistance agency for property, services, or  
a benefit with reckless disregard that the claimant is not entitled to the property, services, or  
benefit.

All of which is a Felony class B offense being contrary to and in violation of  
47.05.210(a)(1) and 47.05.210(b)(1) and against the peace and dignity of the State of Alaska.

COUNT XVI

1  
2 That in the Third Judicial District, State of Alaska, on or about Feb. 17<sup>th</sup>, 2015 to Oct.  
3 9<sup>th</sup>, 2015, at or near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA,  
4 AND ALBERT TABACO ALDEZA, acting as principals and accomplices, knowingly made a  
5 false entry or falsely altered a medical assistance record.

6 All of which is a Misdemeanor class A offense being contrary to and in violation of  
7 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

COUNT XVII

9  
10 That in the Third Judicial District, State of Alaska, on or about March 1<sup>st</sup>, 2016 to July  
11 21<sup>st</sup>, 2016, at or near Anchorage, VICTOR TABACO ALDEZA, LOVELYEMY ALDEZA  
12 LIBAO, REGINO TABACO ALDEZA, AND ALBERT TABACO ALDEZA, acting as  
13 principals and accomplices, knowingly submitted or authorized the submission of a claim to a  
14 medical assistance agency for property, services, or a benefit with reckless disregard that the  
15 claimant is not entitled to the property, services, or benefit.

16 All of which is a Felony class C offense being contrary to and in violation of  
17 47.05.210(a)(1) and 47.05.210(b)(2) and against the peace and dignity of the State of Alaska.

COUNT XVIII

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19  
20 That in the Third Judicial District, State of Alaska, on or about March 1<sup>st</sup>, 2016 to July  
21 21<sup>st</sup>, 2016, at or near Anchorage, VICTOR TABACO ALDEZA, LOVELYEMY ALDEZA  
22 LIBAO, REGINO TABACO ALDEZA, AND ALBERT TABACO ALDEZA, acting as  
23 principals and accomplices, knowingly made a false entry or falsely altered a medical assistance  
24 record.

1 All of which is a Misdemeanor class A offense being contrary to and in violation of  
2 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

3 COUNT XIX

4 That in the Third Judicial District, State of Alaska, on or about March 18<sup>th</sup>, 2017, at or  
5 near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA, AND  
6 GEORGE LAZAGA ALDEZA, acting as principals and accomplices, with the intent to commit  
7 the crime of medical assistance fraud took a substantial step towards, knowingly submitted or  
8 authorized the submission of a claim to a medical assistance agency for property, services, or a  
9 benefit with reckless disregard that the claimant is not entitled to the property, services, or  
10 benefit with reckless disregard that the claimant is not entitled to the property, services, or  
11 benefit.

12 All of which is a Misdemeanor class B offense being contrary to and in violation of  
13 AS11.31.100, 47.05.210(a)(1) and 47.05.210(b)(3) and against the peace and dignity of the State  
14 of Alaska.

15 COUNT XX

16 That in the Third Judicial District, State of Alaska, on or about March 18<sup>th</sup>, 2017, at or  
17 near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA, AND  
18 GEORGE LAZAGA ALDEZA, acting as principals and accomplices, knowingly made a false  
19 entry or falsely altered a medical assistance record.  
20

21 All of which is a Misdemeanor class A offense being contrary to and in violation of  
22 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.  
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COUNT XXI

1  
2 That in the Third Judicial District, State of Alaska, on or about March 21<sup>st</sup>, 2017, at or  
3 near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA,  
4 AND GEORGE LAZAGA ALDEZA, acting as principals and accomplices, with the intent to  
5 commit the crime of medical assistance fraud took a substantial step towards, knowingly  
6 submitted or authorized the submission of a claim to a medical assistance agency for property,  
7 services, or a benefit with reckless disregard that the claimant is not entitled to the property,  
8 services, or benefit.  
9

10 All of which is a Misdemeanor class B offense being contrary to and in violation of  
11 AS11.31.100, 47.05.210(a)(1), and 47.05.210(b)(3) and against the peace and dignity of the State  
12 of Alaska.

COUNT XXII

13  
14 That in the Third Judicial District, State of Alaska, on or about March 21<sup>st</sup>, 2017, at or  
15 near Anchorage, VICTOR TABACO ALDEZA, REGINO TABACO ALDEZA, AND  
16 GEORGE LAZAGA ALDEZA, acting as principals and accomplices, knowingly made a false  
17 entry or falsely altered a medical assistance record.  
18

19 All of which is a Misdemeanor class A offense being contrary to and in violation of  
20 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.  
21

22 The undersigned swears under oath this Information is based upon a review of  
23 Medicaid Fraud Control Unit case number 0665547 submitted to date. The State alleges:  
24  
25

26 Information  
27 *State v. Victor Tabaco Aldeza,*  
*Lovelyemy Aldeza Libao,*  
*Regino Tabaco Aldeza,*  
*Albert Tabaco Aldeza,*  
*George Lazaga Aldeza,*  
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1 This PCA fraud case arose from a tip given to the Department of Health and Social  
2 Services from Arctic Care Services on or about March 20<sup>th</sup>, 2017. PCAs, or Personal Care  
3 Assistants, are enrolled in Medicaid as home- or community-based healthcare providers. The  
4 Alaska Medicaid Program pays PCA agencies to provide services of daily living to senior or  
5 disabled Medicaid recipients, which will allow Medicaid recipients to stay in their home rather  
6 than be placed in an assisted living home type setting or other long-term care facility. Medicaid  
7 recipients are evaluated for medical needs by an employee of the Department of Health and  
8 Social Services. The DHSS evaluator decides on an appropriate number of hours and the types  
9 of services for the recipient to receive home healthcare based on the recipient’s individualized  
10 needs. The Medicaid recipient is then authorized to hire a PCA provider through a PCA agency  
11 to provide those home- or community-based based healthcare services. The PCA provider, as an  
12 employee of the PCA agency, fills out a timesheet for the work done over the course of specific  
13 day or week and both the PCA provider and the recipient (or guardian/power of attorney) signs  
14 the timesheet. The PCA provider then submits the timesheet to the PCA agency. The PCA  
15 agency in turn bills Medicaid for the work reflected on the PCA provider’s timesheet under a  
16 particular code – either code T1019 or S5150. Medicaid pays approximately \$24 an hour to the  
17 PCA agency and the agency must pay the PCA provider at least half of that amount.

20 This case involves several types of Medicaid fraud. One type of Medicaid fraud  
21 investigated by the Medicaid Fraud Control Unit (MFCU) is known as “travel billing.” An  
22 offender commits travel billing fraud by submitting timesheets claiming to have provided PCA  
23 services that cannot possibly have been provided because the provider, or the recipient, or both,  
24 were traveling outside the United States at the time of the purported service. Prior to December

1 23<sup>rd</sup>, 2011, Alaska Medicaid could authorize payment for PCA services while travelling  
2 internationally if the travel was pre-approved. On December 23<sup>rd</sup>, 2011, the Department of  
3 Health sent out a notice to all Medicaid providers that federal law prohibits Medicaid  
4 expenditures for services outside the United States. Under no circumstances may a recipient  
5 travel outside of the United States of America and still receive Medicaid funded services. See 7  
6 AAC 125.050, and 18 U.S.C. § 1396a(80).

7  
8 Another type of Medicaid fraud investigated by MFCU involves a PCA recipient  
9 malingering to their health care professional, or to their PCA agency, or to DHSS, or all three,  
10 with the hope of getting approved for services they would not otherwise be approved for if they  
11 weren't malingering. The malingering PCA recipient would then collude with a PCA provider  
12 (typically a family member), and the two of them would involve an unwitting PCA agency to bill  
13 Medicaid for services not performed and not needed by submitting fraudulent time sheets.

14  
15 Arctic Care Services provides PCA agency services and regularly bills Medicaid and  
16 works with the Department of Health and Social Services to provide PCA services to disabled  
17 and elderly recipients. On March 18<sup>th</sup>, 2017, PN, an Arctic Care Services employee, was in the  
18 Dimond Mall food court area where he recognized **Regino Aldeza** working at the Charley's  
19 Philly Steaks fast food restaurant. PN recognized R. Aldeza because R. Aldeza was supposed to  
20 be a significantly disabled Medicaid recipient being taken care of by his PCA provider, **Victor**  
21 **Aldeza**, who worked as a PCA employee for Arctic Care. PN observed R. Aldeza working at the  
22 Charley's Philly Steaks restaurant in a manner wholly inconsistent with R. Aldeza's and V.  
23 Aldeza's reports of R. Aldeza's disability and needs. PN reported his observations to his  
24

1 supervisor, who in turn reported the situation to DHSS Senior and Disability Services  
2 coordinator LKC.

3           According to Arctic Care and DHSS, R. Aldeza had been assessed as being eligible for  
4 Medicaid and was assigned full-time PCA services, amounting to 36.5 hours per week, since the  
5 2005-2006 timeframe as a result of an aneurysm surgery. R. Aldeza was assessed as needing  
6 assistance in all aspects of life, including eating, locomotion, toileting, meal preparation, basic  
7 household chores, basic walking and range of motion exercises, and personal hygiene. DHSS  
8 reported that it is a requirement of the PCA provider and the PCA recipient to report a change of  
9 circumstances that would require either an increase or a decrease in hours or services. According  
10 to Arctic Care, they also require a periodic home visit where a staff member will visit the home  
11 and assess the PCA to confirm PCA services are still needed for the recipient, and that the PCA  
12 provider is providing the necessary services. As of early 2017, V. Aldeza, R. Aldeza and two  
13 powers of attorney **George Aldeza** and **Alberto Aldeza** had convinced Arctic Care and DHSS  
14 that R. Aldeza needed 36.5 hours of health care per week. During those 36.5 hours, the  
15 following services were supposedly being provided by V. Aldeza to R. Aldeza on a *daily* basis:  
16 six mobility transfers, eight locomotion events, two dressing events, three eating events, eight  
17 meal preps (seven “light” meals and one “main” meal), six toilet uses, one personal hygiene, one  
18 “shopping” event, and two vital sign checkups. V. Aldeza, G. Aldeza, A. Aldeza, and their sister  
19 **Lovelyemy Libao** were billing all or nearly all of these services every day for years by  
20 submitting time sheets to Arctic Care reflecting that the services had been performed for R.  
21 Aldeza, typically between the hours of 4am-10am, or 4am-7am and then again from 7pm-9pm.  
22 Attendant to each timesheet, Arctic Care requires PCA providers to fill out a “Weekly Case  
23  
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1 Note,” and on all of those weekly case notes, V. Aldeza was asked to “identify any changes,  
2 improvement, or decline in the recipient’s health, safety or welfare.” Each week, V. Aldeza  
3 wrote “No Changes,” “No Improvements,” or the like.

4 On March 21<sup>st</sup>, 2017 LKC and a coworker went to the Dimond Mall food court during  
5 the lunch hour. While there, they also observed R. Aldeza working at Charley’s Philly Steaks.  
6 R. Aldeza was moving freely, lifting heavy objects, working vigorously, conversing normally,  
7 using the cash register and making change, preparing meals quickly in a fast-food environment,  
8 and was observed to be in fine health with no observable difficulties doing anything. Based on  
9 her observations, LKC obtained documents from Arctic Care Services and prepared a referral to  
10 the Medicaid Fraud Control Unit.

12 On March 29<sup>th</sup>, 2017 LKC reported the suspected fraud to MFCU, and the case was  
13 assigned to Medicaid Fraud Investigator McLeod. Inv. McLeod collected R. Aldeza’s  
14 employment documents from RK, the owner of Charlie’s Philly Steaks. RK confirmed that R.  
15 Aldeza was employed by his fast food restaurants since approximately Feb. 2015. Department of  
16 Labor records indicate that R. Aldeza worked at RK’s companies since then, but also that R.  
17 Aldeza worked at Wrightway Auto Carriers, Inc. in 2012. Inv. McLeod also discovered that R.  
18 Aldeza was issued a fishing ticket for catching over his limit of trout on Jewel Lake in 2014, that  
19 R. Aldeza has had a fishing and hunting license for years, and that R. Aldeza was issued a  
20 speeding ticket in 2012 in Kenai, and that R. Aldeza had moved into his own apartment with his  
21 daughter at some point, that he takes care of his 11 year old daughter by himself, in 2010 R.  
22 Aldeza had been arrested for Assault 4 and then again for two VCORs, and that R. Aldeza lost  
23 his passport because he was delinquent on his child support. Furthermore, Inv. McLeod  
24  
25

1 discovered that V. Aldeza was billing as if he were working as a care provider during days when  
2 he (V. Aldeza) was outside of the country, was billing times when R. Aldeza was on surveillance  
3 video working or in DOC custody, was billing all of the above-described services when R.  
4 Aldeza was overfishing at Jewel Lake, and that there were several other impossibilities and  
5 inconsistencies in V. Aldeza's timesheets.

6 In 2010 R. Aldeza was arrested for three separate misdemeanor crimes: Assault 4,  
7 VCOR and VCOR. As a result, R. Aldeza was remanded and in custody at various times  
8 through 2010. The Assault 4th charge stemmed from an Anchorage Police Department call at  
9 0449 hours on Aug. 7<sup>th</sup>, 2010. The initial report came in indicating that R. Aldeza was  
10 intoxicated, got into an argument with MK, and punched her twice in the head with a closed fist.  
11 APD observed a black eye and a swollen and cut lower lip on MK. There is no indication in the  
12 police report that V. Aldeza was present at the time. R. Aldeza was placed under arrest at that  
13 time for Assault 4. Later that same day, V. Aldeza bailed R. Aldeza out of jail, according to  
14 court documents. On Aug. 19<sup>th</sup>, 2010 R. Aldeza was violating his conditions of release by  
15 contacting MK at their residence. On Aug. 28<sup>th</sup>, 2010 R. Aldeza was again violating his  
16 conditions of release by contacting MK at their residence. This second VCOR arrest arose  
17 because V. Aldeza called 911 to report that MK was "causing problems." On or about Sep. 1st,  
18 R. Aldeza bailed out and was released from custody again. On Sep. 10<sup>th</sup>, R. Aldeza was again  
19 remanded, this time with a third party custodian requirement. On Sep. 14<sup>th</sup> R. Aldeza entered  
20 into a time-served plea agreement and was convicted of the two VCORs and not the Assault 4.  
21 At no point did any of the involved APD officers observe R. Aldeza to be severely disabled, nor  
22 did the several judges or attorneys involved note any competency or disability issues with R.  
23  
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1 Aldeza during any of his arraignments, bail hearings, or change of plea. V. Aldeza submitted  
2 timesheets claiming, and was paid for, PCA services for every day between Aug. 1<sup>st</sup>, 2010 and  
3 Sep. 25<sup>th</sup>, 2010, including specifically from 0500-0700 on Aug. 7th, as R. Aldeza was in the  
4 process of being arrested and from Sep. 10th-14th while R. Aldeza was in custody.

5 Inv. McLeod contacted the Dimond Mall Security Chief to obtain surveillance video.  
6 The surveillance video showed R. Aldeza driving his own car to and from work, walking from  
7 the parking lot to the food court in the Dimond Mall, showed R. Aldeza changing from his street  
8 clothes to his work clothes by himself with no assistance, showed him standing and ambulating  
9 and conversing normally for many full work days, typically from about 9:15am-3pm.

10  
11 Inv. McLeod interviewed R. Aldeza twice. R. Aldeza stated that he had a “brain bleed”  
12 about 10 years ago, leading to his disability designation. R. Aldeza stated that he moved into his  
13 own apartment with his daughter, whom he cares for by himself, sometime near September or  
14 October 2015. R. Aldeza stated he is still disabled because he is tired when he comes home from  
15 work, and R. Aldeza also stated he is not disabled and can work and live by himself since he  
16 started working for RK. R. Aldeza further stated that V. Aldeza gives him \$500 per month for  
17 rent, but that R. Aldeza does not know what V. Aldeza is putting on his time sheets and R.  
18 Aldeza does not ask questions. During the interviews, R. Aldeza was able to move, converse,  
19 and interact with Inv. McLeod without any outward display of any disability whatsoever,  
20 including during the second interview which was at R. Aldeza’s apartment where R. Aldeza  
21 lived with his young daughter.  
22

23  
24 Inv. McLeod interviewed V. Aldeza. V. Aldeza stated he does “everything” for R.  
25 Aldeza, including dressing, bathing, toileting, shopping, locomotion, prepares cooking, and

1 “everything.” V. Aldeza stated that he’s “not lying” and that “everything is true.” Inv. McLeod  
2 asked V. Aldeza about several impossibilities in his billing. Just as an example, Inv. McLeod  
3 asked about one day when Customs and Border Patrol recorded V. Aldeza entering the United  
4 States in Oregon at about 1:40pm, on a flight from Tokyo, yet V. Aldeza submitted a timesheet  
5 claiming to have provided all of the above-described services to R. Aldeza from 4-7am. Inv.  
6 McLeod also asked V. Aldeza about submitting timesheets for days and times when R. Aldeza is  
7 on surveillance video working, and why V. Aldeza was billing Medicaid for providing services  
8 for R. Aldeza when R. Aldeza clearly was not disabled and clearly did not need the services. V.  
9 Aldeza shortly thereafter terminated the interview.  
10

11           Inv. McLeod interviewed Lovelyemy Libao. Libao stated that she covered for V.  
12 Aldeza when he was traveling outside of the country or otherwise unavailable to provide  
13 “services” for R. Aldeza. Inv. McLeod observed that Libao’s timesheets associated with the  
14 time periods where she was “covering” were often photocopies of each other, with exactly  
15 identical signatures, as well as exactly identical notations and times listing all of the above  
16 services (such as precisely seven light meal preps every time). Inv. McLeod asked Libao about  
17 providing locomotion, dressing, and meal prep services to someone who can drive and walk to  
18 his job, change into his work clothes, and provide meals to other people for a living. Libao  
19 stated she does “homekeeper” type work sometimes, but not every day. Libao also provides  
20 PCA services for the Aldeza father, Justino Aldeza.  
21

22           Inv. McLeod interviewed Alberto Aldeza. Despite being R. Aldeza’s power of attorney  
23 for many years, and signing dozens of timesheets, and being V. Aldeza’s and R. Aldeza’s  
24 brother, A. Aldeza stated that he “don’t know nothing about that.” A. Aldeza stated that he  
25

1 didn't look at the timesheets, he just signed them, and that V. Aldeza did not tell him what the  
2 timesheets were for. A. Aldeza stated he signed stacks of timesheets at a time but doesn't ask  
3 questions. A. Aldeza stated that V. Aldeza asked him to be power of attorney for R. Aldeza, but  
4 A. Aldeza did not and still does not know what the responsibilities are. A. Aldeza terminated the  
5 interview and did not schedule a further interview.

6           Inv. McLeod interviewed George Aldeza. G. Aldeza stated Victor is his partner and R.  
7 Aldeza is his brother-in-law. G. Aldeza came to America in May of 2016 and became R.  
8 Aldeza's power of attorney because V. Aldeza asked him to. G. Aldeza stated he works  
9 typically from 3am to 10pm every day at two different jobs. G. Aldeza stated that despite being  
10 R. Aldeza's power of attorney and signing many timesheets, he didn't know V. Aldeza's work  
11 schedule or the work he does for R. Aldeza.

12           Immigration and Customs Enforcement Agent Brady reviewed V. Aldeza's and R.  
13 Aldeza's travel to and from the country. R. Aldeza did not recently travel outside the country,  
14 due to his suspended passport. V. Aldeza traveled outside of the country several times, including  
15 from Oct. 28<sup>th</sup>, 2009 to Nov. 29<sup>th</sup>, 2009 and from March 28<sup>th</sup>, 2012 to April 25<sup>th</sup>, 2012, and from  
16 April 23<sup>rd</sup>, 2014 to May 21<sup>st</sup>, 2014. Agent Brady observed that V. Aldeza was standing in front  
17 of a U.S. Customs and Border Patrol officer in Oregon at 1:47 and 15 seconds on May 21<sup>st</sup>, 2014.  
18 During each of these time periods, V. Aldeza billed Medicaid for work, or (in 2009) approved L.  
19 Libao's work, that he could not possibly have done or observed because he and R. Aldeza were  
20 in different countries.

21           Inv. McLeod reviewed R. Aldeza's medical records and statements by R. Aldeza's  
22 doctor in support of his PCA re-applications. On Feb. 6<sup>th</sup>, 2017 Dr. Samuelson diagnosed R.  
23

1 Aldeza's "primary diagnosis" as aphthae ulcers, also known as canker sores. R. Aldeza's  
2 secondary diagnosis on that date was depression. Tertiary diagnoses listed were unspecified  
3 gout, esophageal reflux (heartburn), and hypercholesterolemia (high cholesterol). Inv. Quentin  
4 Warren obtained a search warrant for R. Aldeza's medical records, which showed that R. Aldeza  
5 suffered from a singular canker sore, dizzy spells after he took up smoking methamphetamine,  
6 occasional gout which was controlled by basic medication, and occasional headaches or  
7 migraines. Inv. Warren observed that R. Aldeza went to the doctor's office only once with his  
8 PCA, and otherwise no medical professional made any indication that they observed any type of  
9 totally disabling medical condition. The doctors also recorded a "history of aneurysm of the left  
10 posterior communicating artery: clipped 2005, ARH," regarding which the doctors observed "no  
11 acute disease demonstrated in this patient status post aneurysm clipping on the left." R. Aldeza  
12 had "his last follow up on the brain aneurysm in 2008."

14 Counts 3 and 4: On Oct. 28<sup>th</sup>, 2009, V. Aldeza departed the U.S. by air on China Air  
15 flight # 11 to Taipei. On Nov. 29<sup>th</sup>, 2009 V. Aldeza returned to the U.S. by air on China Air  
16 flight # 12 from Taipei. For that time period, V. Aldeza was R. Aldeza's medical power of  
17 attorney, and their sister Lovelyemy Libao was R. Aldeza's PCA provider. V. Aldeza approved  
18 the time sheets submitted by Lovelyemy Libao, certifying the work she allegedly performed while  
19 he was out of the country, by signing under the section "client signature." V. Aldeza's signature  
20 appears below the statement "I hereby certify that my employer worked the hours recorded and  
21 completed the task as assigned." Lovelyemy Libao signed the timesheets below the statement "I  
22 hereby certify that I worked the hours recorded and completed the task assigned." Both  
23  
24

1 signatures appear above the clause “Misrepresentations on this form constitute Medicaid Fraud  
2 punishable by law.” Medicaid paid approximately \$2,278.04 for this date range.

3 Counts 5 and 6: R. Aldeza spent various periods of time in custody from Aug. 7<sup>th</sup>-Sep.  
4 14<sup>th</sup>, 2010. For instance, on Aug. 7<sup>th</sup> at 0449 hours, APD was called out to R. Aldeza’s and  
5 shortly thereafter arrested him for Assault 4. V. Aldeza later bailed him out of custody. V.  
6 Aldeza also submitted a timesheet for that day claiming to have worked from 0500-0700  
7 assisting R. Aldeza with toileting, bathing, meal prep, etc. R. Aldeza signed that timesheet as the  
8 client, and A. Aldeza signed that timesheet as the power of attorney. Medicaid paid  
9 approximately \$94.69 for the total Aug. 7<sup>th</sup> claim. Furthermore, on September 10<sup>th</sup>, 2010 Judge  
10 Nolan remanded R. Aldeza with a third party custodian requirement. At that hearing, R. Aldeza  
11 scheduled a change of plea for Sep. 14<sup>th</sup>, 2010. On that day, Judge Wallace sentenced an in-  
12 custody R. Aldeza to a time-served sentence (90/87). Despite being in custody from at least  
13 September 10th to September 14<sup>th</sup>, V. Aldeza submitted two timesheets claiming to have  
14 provided R. Aldeza with the above-mentioned PCA services during that time period, including  
15 assisting in walking between rooms, dressing and undressing, using assistive devices to help R.  
16 Aldeza eat, bathing, etc. The timesheets submitted by V. Aldeza also bear R. Aldeza’s signature  
17 as the client and A. Aldeza’s signature as the medical power of attorney. The first of the two  
18 timesheets covered Aug. 29<sup>th</sup> to Sep. 11<sup>th</sup> 2010, and the signatures of all three men are dated Sep.  
19 12<sup>th</sup>, 2010 on that timesheet, despite R. Aldeza being in custody on that day. Medicaid paid  
20 approximately \$4,032.68 for the services performed during that time period.  
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24 Counts 8 and 9: On March 28<sup>th</sup>, 2012 V. Aldeza departed the U.S. by air at Seattle to  
25 Incheon on Asiana Airlines flight #271. On April 25<sup>th</sup>, 2012 V. Aldeza returned to the U.S. by

1 air at Seattle from Incheon on Asiana Airlines flight #272. During that time period, V. Aldeza  
2 submitted timesheets claiming that he worked 4-5 hours per day assisting R. Aldeza in eating,  
3 dressing and undressing, toilet use, medication, etc, despite the two of them being in different  
4 countries. The time sheets were signed by V. Aldeza as the PCA provider, by R. Aldeza as the  
5 PCA recipient, and by A. Aldeza as R. Aldeza's medical power of attorney. Medicaid paid  
6 approximately \$3,049.84 for that time period.

7  
8 Counts 9 and 10: On March 19<sup>th</sup>, 2013 R. Aldeza received a prescription from  
9 Anchorage Neighborhood Health Clinic for physical therapy related to a sore shoulder. On April  
10 25<sup>th</sup>, 2013 Providence Sports Medicine and Rehabilitation Therapies conducted a Physical  
11 Therapy Initial Assessment. The assessing therapist noted that R. Aldeza had no difficulty in  
12 washing, carrying small objects, "opening a tight or new jar," or using a knife to cut food. The  
13 assessor also noted no limitation on work, regular daily activities, and mild or moderate  
14 difficulty in sleeping or doing heavy household chores. R. Aldeza's physical therapy progressed  
15 through May 23<sup>rd</sup>, 2013, when the therapist noted he was "doing well, reporting decreased pain  
16 and increased function," with "full shoulder range of motion." During that time period, V.  
17 Aldeza submitted timesheets claiming that he worked 4-5 hours per day assisting R. Aldeza in  
18 eating, dressing and undressing, toilet use, medication, etc. The time sheets were signed by V.  
19 Aldeza as the PCA provider, by R. Aldeza as the PCA recipient, and by A. Aldeza as R.  
20 Aldeza's medical power of attorney. Medicaid paid approximately \$7,153.41 for that time  
21 period.  
22  
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24 Counts 11 and 12: On May 21<sup>st</sup>, 2014 V. Aldeza was standing in front of a U.S.  
25 Customs and Border Patrol officer in Oregon at 1:47pm and 15 seconds, having just deplaned off



1 of his flight from Tokyo. V. Aldeza later submitted a time sheet alleging that he worked from  
2 4am-7am, and again from 7pm-8pm on May 21<sup>st</sup>, 2014. The time sheet was signed by V. Aldeza  
3 as the PCA provider, by R. Aldeza as the PCA recipient, and by A. Aldeza as the medical power  
4 of attorney. Medicaid paid \$95.36 for that time period.

5 Counts 13 and 14: On Aug. 22<sup>nd</sup>, 2014 at 12:40 in the afternoon, Trooper Duell cited  
6 Regino Aldeza for “Over Limit Rainbow Trout” for taking 7 rainbow trout from Jewel Lake  
7 when the limit was 5 rainbow trout. R. Aldeza was with neither V. Aldeza nor A. Aldeza during  
8 the interaction with Trooper Duell. R. Aldeza was ambulatory, casting, conversing, and sporting  
9 in a normal manner. V. Aldeza submitted a time sheet alleging that he worked from 4-7am and  
10 again from 7-8pm, assisting R. Aldeza with locomotion, dressing and undressing, preparing  
11 meals, taking vital signs, bathing, toilet use, personal hygiene, and meal preparation. R. Aldeza  
12 did not act consistently with needing any of those services. The time sheet was signed by V.  
13 Aldeza as PCA provider, R. Aldeza as PCA recipient, and A. Aldeza as medical power of  
14 attorney. Medicaid paid \$97.60 for PCA services fraudulently claimed on that day.

15 Counts 15 and 16: R. Aldeza worked for RK at his restaurants from Feb. 17<sup>th</sup>, 2015 to  
16 Oct. 9<sup>th</sup>, 2015. During this time period, R. Aldeza did not visit Providence Medical Center or  
17 Alaska Regional Medical Center. R. Aldeza’s only medical care came from routine follow-ups  
18 with his primary care physicians for medication refills. At those two visits – on in March and  
19 one in December 2015 – his primary care physician noted that R. Aldeza “does well on his  
20 medication,” that he suffered from headaches that were getting better, and that he has “less  
21 interest in doing the things he normally likes to do.” His primary care physician made no  
22 mention of total disability, nor did R. Aldeza receive any type of medical care or services other  
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1 than those PCA services billed by V. Aldeza. V. Aldeza submitted timesheets, signed by R.  
2 Aldeza and A. Aldeza, throughout that time period claiming to have provided all of the above  
3 services. Medicaid paid approximately \$37,180.65 for that time period.

4 Counts 17 and 18: On March 24<sup>th</sup>, 2016 R. Aldeza went to Providence Medical Center  
5 Emergency Room where he complained of momentary chest pain and dizziness. After treatment  
6 began he reported the symptoms went away and he left the hospital. On March 25<sup>th</sup> R. Aldeza  
7 again went to Providence ER where he reported the symptoms had returned and worsened. The  
8 attending physician noted that R. Aldeza displayed no signs of distress other than recent  
9 alcoholic drinking and methamphetamine use. From that day to approximately July 6<sup>th</sup>, 2016 R.  
10 Aldeza visited Providence, Alaska Regional Medical Center, and Alaska Neighborhood Health  
11 Center at least a dozen separate times for reports of various minor medical complaints, such as  
12 the feeling of a phantom tickle in his throat, general anxiety, vertigo, or the like. At no point  
13 during any of those visits did the medical doctors note any sign of total disability justifying full-  
14 time PCA care. R. Aldeza arrived at and left those visits of his own power and locomotion, and,  
15 when noted, his “discharge condition” was “good.” Both V. Aldeza (claiming PCA work) and L.  
16 Libao (claiming respite work) submitted timesheets claiming to have provided the above-  
17 described services to R. Aldeza during that time period. All of those timesheets bear A. Aldeza’s  
18 signature as the power of attorney. From March 1st to July 31<sup>st</sup>, 2016, Medicaid paid  
19 approximately \$19,418 for PCA and respite services.  
20  
21

22 Counts 19 and 20: On March 18<sup>th</sup>, 2017 at 10:04am an Arctic Care employee went to  
23 the Dimond Mall food court and observed R. Aldeza standing, walking, conversing, working,  
24 lifting heavy objects, preparing meals, and performing normal physical work. Surveillance video  
25

1 shows R. Aldeza arriving at work on that day at 9:17am, at which time he drove into the parking  
2 lot, walked from the parking lot to the food court, changed into his clothes, and engaged in  
3 normal work-day activities. V. Aldeza submitted a timesheet claiming to have worked 6.5 hours  
4 of work starting at 4am, including assistance with “locomotion,” “meal prep,” etc. G. Aldeza  
5 signed that timesheet as R. Aldeza’s power of attorney. V. Aldeza was not paid for the work  
6 claimed on that timesheet, since his fraud was uncovered prior to his final paychecks being sent  
7 to him from Arctic Care.

8  
9 Counts 21 and 22: On March 21<sup>st</sup>, 2017 at 10:04am DHSS employees went to the  
10 Dimond Mall food court and observed R. Aldeza standing, walking, conversing, working, lifting  
11 heavy objects, preparing meals, and performing physical work. Surveillance video shows R.  
12 Aldeza arriving at work on that day at 9:17am, at which time he drove into the parking lot,  
13 walked from the parking lot to the food court, changed into his work clothes, and engaged in  
14 normal work-day activities. V. Aldeza submitted a timesheet claiming to have worked 6.5 hours  
15 of work starting at 4am, including assistance with “locomotion,” “meal prep,” etc. G. Aldeza  
16 signed that timesheet as R. Aldeza’s power of attorney. V. Aldeza was not paid for the work  
17 claimed on that timesheet, since his fraud was uncovered prior to his final paychecks being sent  
18 to him from Arctic Care.

#### 20 BAIL INFORMATION

21 Other than R. Aldeza’s aforementioned 2010 VCOR criminal history, none of the  
22 defendants have relevant criminal history. Other than R. Aldeza’s child, the State has no  
23 information that any of the co-defendants have children or any other ties to the State of Alaska.  
24 All of the defendants have significant ties out-of-country. L. Libao became a naturalized US  
25 citizen in 2005, R. Aldeza immigrated in 1985 and naturalized in 2008, G. Aldeza immigrated

1 sometime around 2016, V. Aldeza is unknown but routinely travels out of the country, A. Aldeza  
2 is unknown. V. Aldeza, R. Aldeza, G. Aldeza and L. Libao all list the same residence address on  
3 their DMV records, a home owned by V. Aldeza. To the best of the State's information and  
4 belief none of the co-defendants have careers.

5 Given the significant and permeating nature of the fraud in this case and the lack of ties  
6 to the State of Alaska, the State is requesting bail be set at \$50,000 cash appearance and \$10,000  
7 cash performance for each defendant, with appropriate conditions set at arraignment.

8 Dated at Anchorage, Alaska, this \_\_\_\_ day of August, 2017.

9  
10 JAHNA LINDEMUTH  
11 ATTORNEY GENERAL

12 By: \_\_\_\_\_  
13 Eric Senta  
14 Assistant Attorney General  
15 Alaska Bar No. 1011091