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

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6
7 JEANLYNN KANA JOHNSON

8 DOB: 03/02/1991

9 APSIN ID: 7527972

DMV NO.: 7527972 AK

ATN: 115745697

10 Defendant.

11
12 No. 3KN-19-_____ CR (Jeanlynn Kana Johnson)

13 INFORMATION

14 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)
15 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.
16 The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990:

17 Count I - AS 47.05.210(a)(1)Fel C
18 Medical Assistance Fraud
19 Jeanlynn Kana Johnson - 001

20 Count II - AS 47.05.210(a)(5)
21 Medical Assistance Fraud
22 Jeanlynn Kana Johnson - 002

23
24 THE ATTORNEY GENERAL CHARGES:

25 COUNT I

26 That in the Third Judicial District, State of Alaska, on or about Jan. 2014 to Sept.
27 2015, at or near Kenai, JEANLYNN KANA JOHNSON, knowingly submitted or authorized the

1 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, and the
3 value of the property, services, or benefit is greater than \$500.

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

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COUNT II

That in the Third Judicial District, State of Alaska, on or about Jan. 2014 to Sept.
2015, at or near Kenai, JEANLYNN KANA JOHNSON, 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.

The undersigned swears under oath this Information is based upon a review of
police report 0635378 submitted to date.

This case arose after a tip from PCA agency Consumer Direct of Kenai to the Medicaid
Fraud Control Unit (MFCU). Per the complaint, the agency noticed that personal care attendant
(PCA) timesheets submitted by Jeanlyn Johnson to Consumer Direct were fraudulently filled out.

PCAs are enrolled in Medicaid as home-based healthcare providers. The Alaska
Medicaid Program pays PCAs to provide services of daily living to Medicaid recipients, which
will allow Medicaid recipients to stay in their home rather than be placed in an assisted living
home type setting. Medicaid recipients are evaluated for medical needs by an employee of the
Department of Health and Social Services. The DHSS evaluator decides on an appropriate
number of hours for the recipient to receive home healthcare based on the recipient's needs. The
Medicaid recipient is then authorized to hire a PCA through a PCA agency to provide those
home based healthcare services. The PCA fills out a timesheet for the work done over the course
of specific day or week and both the PCA and the recipient (or guardian) signs the timesheet.

1 The PCA then submits the timesheet to a PCA agency. The PCA agency in turn bills Medicaid.
2 Medicaid pays approximately \$24 an hour to the agency and the agency must pay the PCA at
3 least half of that amount.

4 Consumer Direct reported that approximately 20 photocopied PCA timesheets were
5 submitted between the dates of 1/12/2014 through 5/30/2015. The company reported that it
6 appeared the PCA timesheets were photocopies of each other claiming 40.5 hours of potentially
7 fraudulent work per week. The timesheets were all signed by Jeanlyn Johnson claiming work
8 performed for Joanne Fox. The timesheets were clearly photocopies, including etched over dates
9 on the signature lines, identical signatures, identical times for performing various services,
10 identical number and extent of services performed, etc. In total, Medicaid paid approximately
11 \$19,000 for services reflected in the photocopied timesheets.
12

13 The MFCU case was assigned to Inv. Don McLeod. Inv. McLeod and other agents
14 interviewed Johnson. Johnson stated that she and a client of hers, Berry "Joanne" Fox, would
15 regularly fabricate PCA timesheets and split the money. Johnson stated that she worked
16 approximately 5 hours per week of nominal PCA work, such as going to the grocery store with
17 Fox, while claiming the full 40.5 hours per week. Johnson would get paid \$16/hr from
18 Consumer Direct, and then Johnson would pay Fox \$100-\$200 per pay period or per week for
19 her cooperation. Johnson stated that the whole scheme was Fox's idea, and she knew it was
20 wrong and a crime, but she committed the crime because she was poor and needed the money.
21 Johnson stated that the 20 timesheets seemed like about the right number she fraudulently
22 copied.
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25 Johnson committed the crime of Medical Assistance Fraud, AS § 47.05.210(a)(1) by
26 submitting false photocopied timesheets claiming work that was not performed in an amount
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over \$500. Johnson committed the crime of Medical Assistance Fraud, AS § 47.05.210(a)(5) by making false entries in the timesheets.

BAIL INFORMATION

Per the Alaska Public Safety Information Network, the defendant has the following convictions in Alaska: No relevant criminal history. The State requests and summons.

Dated at Kenai, Alaska, this ____ day of January, 2019.

KEVIN G. CLARKSON
ATTORNEY GENERAL

By: _____
Eric Senta
Assistant Attorney General
Alaska Bar No. 1011091