

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

STATE OF ALASKA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
MILE VIANE FAINUULELEI, )  
DOB: 11/30/1982 )  
APSIN ID: 7232363 )  
DMV NO. 7149423 AK )  
ATN: 107-504-748 ) Case No. 3AN-13- CR  
)  
KATERINA KATHERINE LETUANE, )  
DOB: 12/9/1986 )  
APSIN ID: 7276803 )  
DMV NO. 7186532 AK )  
ATN: 107-504-676 )  
)  
Defendants. ) Case No. 3AN-13- CR  
\_\_\_\_\_)

**INDICTMENT**

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 47.05.210(a)(1)Fel C  
Medical Assistance Fraud  
Mile Viane Fainuulelei - 001

Count II - AS 47.05.210(a)(2)Fel C  
Medical Assistance Fraud  
Katerina Katherine Letuane - 001

Count III - AS 11.46.130(a)(1)  
Theft In The Second Degree  
Mile Viane Fainuulelei - 002  
Katerina Katherine Letuane - 002

Count IV - AS 47.05.210(a)(1)Fel C  
Medical Assistance Fraud  
Katerina Katherine Letuane - 003

Count V - AS 47.05.210(a)(2)Fel C  
Medical Assistance Fraud  
Mile Viane Fainuulelei - 003

Count VI - AS 11.46.130(a)(1)  
Theft In The Second Degree  
Mile Viane Fainuulelei - 004  
Katerina Katherine Letuane - 004

Count VII - AS 11.56.200  
Perjury  
Katerina Katherine Letuane - 005

THE GRAND JURY CHARGES:

**Count I**

That on or about December 16, 2007 to March 16, 2008, at or near Anchorage in the Third Judicial District, State of Alaska, MILE VIANE FAINUULELEI, 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 class C felony offense being contrary to and in violation of AS 47.05.210(a)(1) and against the peace and dignity of the State of Alaska.

**Count II**

That on or about December 16, 2007 to March 16, 2008, at or near Anchorage in the Third Judicial District, State of Alaska, KATERINA KATHERINE LETUANE, knowingly prepared or assisted another person to prepare a claim for submission 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 class C felony offense being contrary to and in violation of AS 47.05.210(a)(2) and against the peace and dignity of the State of Alaska.

**Count III**

That on or about December 16, 2007 to March 16, 2008, at or near Anchorage in the Third Judicial District, State of Alaska, KATERINA KATHERINE LETUANE and MILE VIANE FAINUULELEI committed the crime of theft and the value of the property or services was \$500 or more but less than \$25,000.

All of which is a class C felony offense being contrary to and in violation of AS 11.46.130(a)(1) and against the peace and dignity of the State of Alaska.

**Count IV**

That on or about April 28, 2008 to June 16, 2008, at or near Anchorage in the Third Judicial District, State of Alaska, KATERINA KATHERINE LETUANE, 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 class C felony offense being contrary to and in violation of AS 47.05.210(a)(1) and against the peace and dignity of the State of Alaska.

**Count V**

That on or about April 28, 2008 to June 16, 2008, at or near Anchorage in the Third Judicial District, State of Alaska, MILE VIANE FAINUULELEI, knowingly prepared or assisted another person to prepare a claim for submission 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 class C felony offense being contrary to and in violation of AS 47.05.210(a)(2) and against the peace and dignity of the State of Alaska.

**Count VI**

That on or about April 28, 2008 to June 16, 2008, at or near Anchorage in the Third Judicial District, State of Alaska, KATERINA KATHERINE LETUANE and MILE VIANE FAINUULELEI committed the crime of theft and the value of the property or services was \$500 or more but less than \$25,000.

All of which is a class C felony offense being contrary to and in violation of AS 11.46.130(a)(1) and against the peace and dignity of the State of Alaska.

**Count VII**

That on or about December 5, 2011, at or near Anchorage in the Third Judicial District, State of Alaska, KATERINA KATHERINE LETUANE made a false sworn statement which the person did not believe to be true.

All of which is a class B felony offense being contrary to and in violation of AS 11.56.200 and against the peace and dignity of the State of Alaska.

DATED this \_\_\_\_\_ day of February, 2013 at Anchorage, Alaska.

A true bill

---

Grand Jury Foreperson

---

A. Andrew Peterson  
Assistant Attorney General,  
ABA No. 0601002

WITNESSES EXAMINED BEFORE THE GRAND JURY:

Katherine Paakki