

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

STATE OF ALASKA,)
)
 Plaintiff,)
)
 vs.)
)
 REAGAN CUNANAN MEDINA,)
 DOB: 9/18/1982)
 APSIN ID: 6861989)
 DMV NO. 6861989 AK)
 ATN: 114-356-475)
)
 Defendant.)
)
 _____)
 Case No. 3AN-13- CR.

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 47.05.210(a)(1)Fel B
Medical Assistance Fraud
Reagan C. Medina - 001

Count II - AS 47.05.210(a)(5) Mis A
Medical Assistance Fraud
Reagan C. Medina - 002

THE OFFICE OF SPECIAL PROSECUTIONS AND APPEALS CHARGES:

Count I

That on or about October 2010 through February 2013, at or near Anchorage in the Third Judicial District, State of Alaska, REAGAN C. MEDINA 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 B 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 October 2010 through February 2013, at or near Anchorage in the Third Judicial District, State of Alaska, REAGAN C. MEDINA, knowingly made a false entry or falsely altered a medical assistance record.

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

Probable Cause Statement:

The undersigned swears under oath this Information is based upon a review of the Medicaid Fraud Control Unit (MFCU) investigative report submitted to date.

On February 26, 2013, MFCU received a fraud referral from Lynne Keilman-Cruz, RN of the Division of Senior and Disability Services (DSDS) with the Department of Health and Social Services (DHSS). The referral provided that on January 18, 2013, DHSS employees made a presentation to the residents of Chugach Manor and Chugach View apartments located in Anchorage, which are low income housing facilities operated by Alaska Housing Finance Corporation. After the presentation a 91 year old resident approached Keilman-Cruz and reported that she had been solicited for and pressured to accept personal care attendant (PCA) services by a Good Faith Services, LLC (Good Faith) employee. The resident reported that she only agreed to services on three days per week and that the PCA stopped coming to her apartment after the resident returned from an out-of-state vacation.

PCAs are home based healthcare providers that the Alaska Medicaid Program pays to provide services which will allow Medicaid recipients to stay in their home rather than be placed in a nursing home type setting. Medicaid recipients are evaluated for their needs and a PCA is then hired by the recipient to provide those needs

in the recipient's home. The PCA fills out a timesheet for the work done and submits it to a PCA agency that in turn bills Medicaid. Medicaid pays approximately \$24 an hour to the agency and the agency must pay the PCA at least half of that amount.

On March 19, 2013, MFCU investigators executed a search warrant at the offices of Good Faith. Employee Reagan Medina was interviewed during the service of the warrant. Medina stated he had been employed by Good Faith since September 2010 as a client manager, employee trainer, and PCA. Reagan's duties required him to open and close the office on a daily basis and conduct training sessions for employees on Saturdays.

MFCU investigators asked Department of Homeland Security, Immigration and Customs Enforcement Agent Timothy Brady to check on international travel for Medina. Immigration records revealed that Medina traveled internationally from Honolulu to Manila on May 5, 2012 and returned to the United States on May 19, 2012. Medicaid records revealed that Medina billed for providing PCA services while he was traveling internationally in the Philippines. Medina was re-interviewed on April 24, 2013. Medina admitted to traveling to the Philippines in 2012 and to billing Medicaid for PCA services through Good Faith during the same time. Medicaid records reveal that Medina billed Medicaid a total of \$2,105.30 for services he claimed to be providing to recipients in Alaska while traveling internationally.

Medina was subsequently re-interviewed by MFCU investigators. Medina stated that during his employment that he billed Medicaid for providing PCA services to four different Medicaid recipients through Good Faith (R.B., E.S., F.A., and P.P.). Medina initially stated that 100% of his services for E.S. were fraudulent as he provided no services to E.S., but rather that he split the payment from Medicaid for the services with E.S. Medina, however, said that only 70% of his billing for the remaining recipients was fraudulent. Medina later admitted that all of the time he billed for all of his recipients was fraudulent.

MFCU investigators pulled timesheets for Medina and compared these timesheets to Medicaid billing. The timesheets revealed that from October 2010

through February 2013 that Medina billed Medicaid at total of \$90,151.88 for providing PCA services to Medicaid recipients. Medicaid paid Medina a total of \$60,723.13 just for providing PCA services to E.S. from May 14, 2011 through February 13, 2013. Medina admitted that he did not provide any services to E.S., but rather that he and E.S. split the proceeds from the money paid by Medicaid for the services he claimed to be providing. E.S. subsequently notified DHSS that he no longer needed PCA services paid for by Medicaid.

Bail Information:

CONV COURT	CONV DATE	CONVICTING CHARGE	COURT DOCKET	POS ID	FEL	ATN
DAN	01/22/07	HINDER PROSECUTION 2- VAR ACTS RE	3AN-06-8541		Y	N 109780263

Dated at Anchorage, Alaska, this ____ day of November, 2013.

MICHAEL C. GERAGHTY
ATTORNEY GENERAL

By: _____
A. Andrew Peterson
Assistant Attorney General
Alaska Bar No. 0601002

SUBSCRIBED AND SWORN TO before me this ____ day of
November 2013, at Anchorage, Alaska.

Notary Public in and for Alaska
My Commission Expires: End of Hire