

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

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6
7 LYNN M. SWANSON
8 DOB: 08/05/1980
9 APSIN ID: 6695397
10 DMV NO.: 6695397 AK
11 ATN: 114677613

12 Defendant.

13 No. (Lynn M. Swanson)

14 INFORMATION

15 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:

16 Count I - AS 47.05.210(a)(2)
17 Medical Assistance Fraud
18 Lynn M. Swanson - 001

19 Count II - AS 47.05.210(a)(5)
20 Medical Assistance Fraud
21 Lynn M. Swanson - 002

22 THE ASSISTANT ATTORNEY GENERAL CHARGES:

23 COUNT I

24 That in the Third Judicial District, State of Alaska, on or about November 2015 -
25 February 2016, at or near Wasilla, LYNN M. SWANSON knowingly prepared or assisted
26 another person in preparing claims for submission to a medical assistance agency for property,
27 services, or a benefit with reckless disregard that the claimant is not entitled to the property,

1 services, or benefit; to wit: each individual false timesheet is a separate incident of Medicaid
2 Assistance Fraud.

3 All of which is a Misdemeanor class A offense being contrary to and in violation of
4 47.05.210(a)(2) 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 November 2015 -
February 2016, at or near Wasilla, LYNN M. SWANSON knowingly made false entries in, or
falsely altered, medical assistance records; to wit: each individual false timesheet is a separate
incident of Medicaid Assistance Fraud.

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 State gives notice that it reserves the right to recharge the Defendant's conduct
such that each individual false timesheet would constitute a separate count of Medical Assistance
Fraud under each subsection of AS 47.05.210 identified above.

The undersigned swears under oath this Information is based upon a review of
reports in MFCU case number 0646952 submitted to date:

Medicaid is a program, funded by the state and federal governments, providing
Medical coverage to disabled and low-income Alaskans, known as "recipients." The
Alaska Department of Health and Social Services ("DHSS") administers Medicaid.
Medical providers are enrolled in Medicaid so that they may submit claims to DHSS and
receive payment, from Medicaid, for medical services provided to recipients.

The Defendant, Lynn Swanson, is (or, was until recently) enrolled in Medicaid
as a personal care assistant ("PCA"). PCAs provide home health care services to
Medicaid recipients. The Defendant was, until recently, employed by an agency that
employed various PCA's in the Wasilla area.

On or about April 4, 2016, the Defendant's former employer submitted a
complaint that the Defendant had forged a recipient's signature on timesheets that falsely
claimed that the Defendant had provided services to a recipient.

1 On or about April 11, 2016, the recipient told MFCU investigators that the
2 Defendant had failed to provide PCA services on approximately nine dates in February
3 2016. Additionally, the recipient said that her signature, which appears on three timesheet
4 dated in January and February 2016, is not actually hers.

5 On or about May 5, 2016, MFCU investigators interviewed the Defendant. The
6 Defendant admitted that she signed, and submitted to the agency, multiple timesheets
7 bearing dates from November 2015 – February 2016. Initially, the Defendant claimed to
8 have actually provided the services indicated. Later in the interview, however, the
9 Defendant admitted that she had not actually been to the recipient's home on the dates in
10 question. She agreed that her conduct constituted fraud.

11 MFCU investigators calculate the value of the fraudulent claims submitted to
12 Medicaid to be \$274.50, and the loss to the agency due to payment to the Defendant for
13 work she did not perform as being \$234.57.

14 Dated at Anchorage, Alaska, this 29th day of July, 2016.

15 JAMES E. CANTOR
16 ATTORNEY GENERAL

17 By: _____
18 Jonas M. Walker
19 Assistant Attorney General
20 Alaska Bar No. 0712110