

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

STATE OF ALASKA,

Plaintiff,

vs.

MARGARET VALERIE WILLIAMS

DOB: 04/02/1942

APSIN ID: 6914420

DMV NO.: 6912936 AK

ATN: 115745247

Case No. 3AN-17-

CR.

DONALD ABUBOACKARI GOODING
KALLON

DOB: 05/13/1971

APSIN ID:

DMV NO.:

ATN: 115745211

Case No. 3AN-17-

CR.

WILSON ABOULAH I ESAPA

DOB: 02/01/1959

APSIN ID: 8478839

DMV NO.: 7571777 AK

ATN: 115745238

Case No. 3AN-17-

CR.

PRINCESS FRANCESCA TURAY

DOB: 03/15/1980

APSIN ID: 6532992

DMV NO.: 6532992 AK

ATN: 115745229

Case No. 3AN-17-

CR.

FLAMINGO EYE, LLC.

ATN: 115745256

Case No. 3AN-17-

CR.

Defendants.

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:

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Count VI - AS 47.05.210(a)(1)
Medical Assistance Fraud
Margaret Valerie Williams - 006, Donald Abuboackari Gooding Kallon - 006, Princess
Francesca Turay - 006, FLAMINGO EYE, LLC - 006

Count VII - AS 47.05.210(a)(1)
Medical Assistance Fraud
Margaret Valerie Williams - 007, Donald Abuboackari Gooding Kallon - 007, Princess
Francesca Turay - 007, FLAMINGO EYE, LLC - 007

Count VIII - AS 47.05.210(a)(1)
Medical Assistance Fraud
Margaret Valerie Williams - 008, Donald Abuboackari Gooding Kallon - 008, Princess
Francesca Turay - 008, FLAMINGO EYE, LLC - 008

Count IX - AS 47.05.210(a)(5)
Medical Assistance Fraud
Margaret Valerie Williams - 009, Donald Abuboackari Gooding Kallon - 009, Princess
Francesca Turay - 009, FLAMINGO EYE, LLC – 009, Wilson Aboulahi Esapa - 009

Count X - AS 47.05.210(a)(5)
Medical Assistance Fraud
Margaret Valerie Williams - 010, Donald Abuboackari Gooding Kallon - 010, Princess
Francesca Turay - 010, FLAMINGO EYE, LLC – 010, Wilson Aboulahi Esapa - 010

Count XI - AS 47.05.210(a)(1)
Medical Assistance Fraud
Margaret Valerie Williams - 011, Donald Abuboackari Gooding Kallon - 011, Princess
Francesca Turay - 011, FLAMINGO EYE, LLC - 011

Count XII - AS 11.31.100 / 11.56.610(a)(1)
Attempted Tampering With Physical Evidence
Margaret Valerie Williams - 012, Donald Abuboackari Gooding Kallon - 012, Princess
Francesca Turay - 012, FLAMINGO EYE, LLC – 012, Wilson Aboulahi Esapa - 012

1 THE ATTORNEY GENERAL CHARGES:

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COUNT VI

That in the Third Judicial District, State of Alaska, on or about July 25, 2016, at or near Anchorage, MARGARET VALERIE WILLIAMS, DONALD ABUBOACKARI GOODING KALLON, PRINCESS FRANCESCA TURAY, AND FLAMINGO EYE, LLC, as principal and/or accomplice, 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, to wit: a single T2021 violation regarding Jane Doe and John Doe.

All of which is a Misdemeanor class A offense being contrary to and in violation of 47.05.210(a)(1) 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 July 19, 2016, at or near Anchorage, MARGARET VALERIE WILLIAMS, DONALD ABUBOACKARI GOODING KALLON, PRINCESS FRANCESCA TURAY, AND FLAMINGO EYE, LLC, as principal and/or accomplice, 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, to wit: a single T2021 violation with respect to Jane Does 2 and 3.

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

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4 COUNT VIII

5 That in the Third Judicial District, State of Alaska, on or about August 20, 2014,
6 at or near Anchorage, MARGARET VALERIE WILLIAMS, DONALD
7 ABUBOACKARI GOODING KALLON, PRINCESS FRANCESCA TURAY, AND
8 FLAMINGO EYE, LLC, as principal and/or accomplice, knowingly submitted or
9 authorized the submission of a claim to a medical assistance agency for property,
10 services, or a benefit with reckless disregard that the claimant is not entitled to the
11 property, services, or benefit, to wit: a single T2016 violation with respect to Jane Doe.

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

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17 COUNT IX

18 That in the Third Judicial District, State of Alaska, on or about April 5, 2016, at
19 or near Anchorage, MARGARET VALERIE WILLIAMS, DONALD ABUBOACKARI
20 GOODING KALLON, WILSON ABOULAHY ESAPA, PRINCESS FRANCESCA
21 TURAY, AND FLAMINGO EYE, LLC, as principal and/or accomplice, knowingly
22 made a false entry or falsely altered a medical assistance record, to wit: a single Jane Doe
23 day habilitation record.
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1 All of which is a Misdemeanor class A offense being contrary to and in violation
2 of 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

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4 COUNT X

5 That in the Third Judicial District, State of Alaska, on or about December 15,
6 2014, at or near Anchorage, MARGARET VALERIE WILLIAMS, DONALD
7 ABUBOACKARI GOODING KALLON, WILSON ABOULAHY ESAPA, PRINCESS
8 FRANCESCA TURAY, AND FLAMINGO EYE, LLC, as principal and/or
9 accomplice, knowingly made a false entry or falsely altered a medical assistance record,
10 to wit: a single John Doe day habilitation record.

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

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16 COUNT XI

17 That in the Third Judicial District, State of Alaska, on or about November 7,
18 2015, at or near Anchorage, MARGARET VALERIE WILLIAMS AND DONALD
19 ABUBOACKARI GOODING KALLON AND PRINCESS FRANCESCA TURAY
20 AND FLAMINGO EYE, LLC, as principals or accomplices, knowingly submitted or
21 authorized the submission of a claim to a medical assistance agency for property,
22 services, or a benefit with reckless disregard that the claimant is not entitled to the
23 property, services, or benefit, to wit: a single T2016 violation with respect to Jane Doe.

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

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4 **COUNT XII**

5 That in the Third Judicial District, State of Alaska, on or about September 22,
6 2016, at or near Anchorage, MARGARET VALERIE WILLIAMS, DONALD
7 ABUBOACKARI GOODING KALLON, WILSON ABOULAH I ESAPA, PRINCESS
8 FRANCESCA TURAY, AND FLAMINGO EYE, LLC, as principal and/or accomplice,
9 with the intent to commit the following crime took a substantial step towards destroying,
10 mutilating, altering, suppressing, concealing, or removing physical evidence with intent
11 to impair its verity or availability in an official proceeding or a criminal investigation, to
12 wit: ordering staff to alter documents to match false CIR delivered to DHSS.

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15 All of which is a Misdemeanor class A offense being contrary to and in violation
16 of AS11.31.100/11.56.610(a)(1) and against the peace and dignity of the State of Alaska.

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18 Further information:

19 This case arose after the Medicaid Fraud Control Unit (“MFCU”) began
20 investigating Flamingo Eye, LLC following a murder which occurred in one of the
21 company’s facilities on November 7th, 2015. A resident of Viburnum House, Gilbert
22 Nashookpuk, murdered an employee while that employee was the sole care provider
23 working in the house at the time. See case 3AN-15-10026CR for further details. As of
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1 the writing of this Information, Nashookpuk has been convicted of Murder in the First
2 Degree, with sentencing scheduled at a later date.

3 Flamingo Eye, LLC is a corporation owned by Margaret Williams. Williams,
4 doing business through Flamingo Eye, LLC, runs several Assisted Living Homes
5 (“ALHs”) throughout the Anchorage area. The physical houses are described in the
6 company by name, such as “Stanford house,” “Viburnum house” (a/k/a “Eye to Eye”),
7 “Eye to Eye 2,” and “Flamingo house.” At each of these residences, Flamingo Eye, LLC
8 houses several adult individuals with developmental or cognitive disabilities of various
9 degrees. These recipients have been approved by the Department of Health and Social
10 Services to receive Medicaid assistance, including assistance for residential living
11 support and day rehabilitation (“dayhab”). The basic plan approved by DHSS was that
12 one or more recipients would live in a home supported by 24/7 care to provide for their
13 needs and assist them in developing various skills to assist them in transitioning to self-
14 sufficiency. The ALHs, which are typically for-profit entities, would then bill Medicaid
15 for the various services provided to those recipients.
16

17 Margaret Williams owns Flamingo Eye, LLC. Margaret Williams was paid
18 personally by Medicaid for the care of the several individuals in her various ALHs. The
19 business facilities were registered largely under the Flamingo Eye, LLC name. Williams,
20 Princess Turay and Donald Kallon (a/k/a Abuboackari Gooding Kallon a/k/a Donald
21 Abuboackari Kallon a/k/a Abu Kallon) ran the business directly on a day to day basis.
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1 Williams, Turay and Kallon were each personally and substantially involved in the
2 “upper management” decisions of the company.

3 Flamingo Eye, LLC employed dozens of people as caregivers during the course of
4 administering these ALHs over the years. The typical work week for a typical employee
5 was to work a 12-hour day or night shift at approximately \$10-\$15 per hour for
6 approximately 60 hours per week. The employees would work either day or night shift in
7 order to keep at least one person in each ALH at a time. Other typical employees were
8 dedicated dayhab employees, who would arrive at the various houses to pick up the
9 residents to take them out into the community. Each dayhab employee would be
10 assigned to take the recipients, often in groups of two, out for the recipients’ dayhab
11 activities for the day. The recipients would go to dayhab in shifts of various lengths,
12 typically a morning group, an afternoon group, and an evening group. Each ALH could
13 also be managed by a “middle manager,” who oversaw the day to day operations of that
14 particular house and its employees, and who reported to Margaret Williams, Princess
15 Turay and Donald Kallon. One such “middle manager” was Wilson Esapa, who oversaw
16 the Viburnum house for a period of time.

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21 The Department of Health and Social Services, working in conjunction with a
22 recipient’s Care Coordinator, approved the Medicaid recipient for a specific type and
23 level of care, detailed in a Plan of Care (POC) for each resident of an ALH. A POC
24 provides several specific schedules, plans, and goals for each recipient, such as medical
25 visits, emergency contacts, self-sufficiency goals, medication schedules, vocational

1 training, etc. For those residents represented in guardianship proceedings, the POC must
2 also be approved by their Office of Public Advocacy guardians. A POC must also be
3 signed and approved by a representative of the ALH, as well as any other family
4 representative of the resident, or any other relevant care coordinator. Each recipient's
5 POC must be reviewed and updated every year by all appropriate parties. Each
6 recipient's POC must also be reviewed by employees of the ALH in which that recipient
7 resides.
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9 A typical POC approved by DHSS may allow for a particular recipient to reside in
10 a "group residence" setting with at least one 24/7 employee to oversee a group of five
11 recipients in a single home. Alternatively, a typical POC approved by DHSS may allow
12 for a particular recipient to reside in a single resident "supported living" setting. After
13 DHSS approves a specific plan for the type of house the recipient may reside in (group or
14 single), DHSS would then approve a specific Medicaid billing code and rate for the ALH
15 to bill under for that person. A requirement of the POC and of Medicaid is that the ALH
16 must follow the POC in order to lawfully bill Medicaid for the approved residential
17 services. Group residency is paid by Medicaid at approximately \$309.43 per day per
18 recipient under billing code T2016. Single, supported living residency is paid at
19 approximately \$541.32 per day for that one recipient under billing code T2017. These
20 rates do not include rent or other incomes, which were typically paid by the recipient's
21 family members or the Office of Public Advocacy.
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1 A typical POC may also include a requirement that the employees of the ALH
2 engage in dayhab, or trips out into the community for the recipients to work on various
3 social and self-sufficiency skills. A POC may allow the ALH to do the dayhab, or may
4 approve a different organization or individual to do dayhab trips with the recipients. An
5 example of a typical dayhab trip done by an ALH may include a trip to the mall, a trip to
6 the gym, or a trip to the grocery store. The POC requires that the dayhab be either group
7 or single trips into the community, and the POC approved a maximum amount of time –
8 typically three or four hours – an ALH could bill for each dayhab trip in a day. A
9 requirement of the POC and of Medicaid is that the ALH must follow the POC in order to
10 lawfully bill Medicaid for the approved dayhab services. Group dayhab services were
11 paid by Medicaid \$7.32 per 15 minutes, per recipient under code T2021HQ. Single
12 dayhab services were paid by Medicaid at \$10.46 per 15 minutes, for that one recipient
13 under code T2021.

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17 Jane Doe 1 was one resident at Viburnum house since approximately Nov. 2013
18 until she moved to Stanford house. Jane Doe 1’s POC required that she reside in
19 “supported living,” as defined in 7 AAC 130.265(d). Jane Doe 1’s supported living is
20 defined as one-on-one 24/7 care provided in the recipient’s own private residence. Jane
21 Doe 1’s POC also required that her dayhab be conducted one-on-one, and approved the
22 ALH to bill up to three hours per day in accordance with 7 AAC 130.260. Jane Doe 1’s
23 2014, 2015 and 2016 POCs were approved by her care coordinator, OPA guardian, and
24 Margaret Williams (2014) and Princess Turay (2015 and 2016).

1 John Doe was a resident of Viburnum house since approximately July 2012. John
2 Doe's POC required that he reside in group residential setting as defined in 7 AAC
3 130.265(f), defined as a residence with two or more Medicaid recipients residing in the
4 home overseen by one 24/7 staff member. John Doe's POC also required that his dayhab
5 be conducted one-on-one, and approved the ALH to bill up to three hours per day in
6 accordance with 7 AAC 130.260. John Doe's 2013 and 2014 POCs were signed by
7 Margaret Williams and his 2015 and 2016 POCs were signed by Princess Turay.

9 Jane Doe 2 was a resident at Flamingo house from Sep. 2012. Jane Doe 2's POC
10 required that she reside in a group residential setting in a home overseen by one 24/7 staff
11 member. Jane Doe 2's POC also required that her dayhab be conducted one-on-one, and
12 approved the ALH to bill up to three hours per day. Jane Doe 2's 2012 and 2013 POC
13 were signed by unknown staff of Flamingo Eye, and her 2015 and 2016 POC were signed
14 by Donald Kallon.

16 Jane Doe 3 was a resident at Flamingo house from approximately July 2013. Jane
17 Doe 3's POC required that she reside in a family or group residential setting with at most
18 five Medicaid recipients residing in the home overseen by one 24/7 staff member. Jane
19 Doe 2's POC also required that her dayhab be conducted one-on-one, and approved the
20 ALH to bill up to three hours per day. Jane Doe 3's 2013 POC was signed by Margaret
21 Williams, her 2014 and 2015 POCs were signed by Princess Turay, and her 2015 and
22 2016 POCs were signed by Donald Kallon.

1 Several other recipients resided at Flamingo Eye, LLC's various houses, each with
2 POCs similar to, though not identical to, the above four examples. The approved billing
3 for each of the recipient's care varied by year and by recipient, but a typical POC
4 approved approximately \$150,000 - \$250,000 per recipient per year. At any given time,
5 up to six recipients were living in each of Margaret William's ALHs, with the exception
6 of Stanford house where only one or two recipients resided, for a total of about 10 -15
7 recipients living in Flamingo Eye, LLC properties at any given time.

9 Through the course of investigating Flamingo Eye, LLC after the Nov. 7th, 2015
10 murder, several discrepancies and impossibilities in the Medicaid billing were discovered
11 by MFCU Investigator Don McLeod. Inv. McLeod discovered discrepancies and
12 impossibilities on the significant majority of the Medicaid billing documents provided by
13 Flamingo Eye, LLC. By way of just a few examples, the dayhab employee would file a
14 time sheet indicating they provided 3 hour long individual dayhab services to six
15 individuals in a single shift. Or the dayhab employee would file a time sheet indicating
16 that they went to various closed businesses on Easter. Or the dayhab employee would
17 file a time sheet for a particular day of the month that was identical to that same day in
18 every other month that calendar year. Or the dayhab employee would indicate they went
19 to a business during hours when that business is normally closed. Or the same residential
20 employee would write that they were overseeing the group residence with the 5 recipients
21 (John Doe's purportedly duplex-style house) and the single residence with the 1 recipient
22 (Jane Doe 1's purportedly duplex-style house) on the same shift. During each of these

1 instances, Investigator McLeod observed that Flamingo Eye, LLC would routinely bill an
2 inflated and fraudulent amount of individual dayhab for each of their recipients, or an
3 inflated and fraudulent amount of single residential service for Jane Doe 1.

4 Inv. McLeod interviewed several of the lower level employees after discovering
5 the paperwork discrepancies. Each of the interviewed employees admitted that they had
6 filled out documents during the course of their employment which were not true, or were
7 true but later changed by upper management, or were true and later disregarded by upper
8 management during the course of billing Medicaid.
9

10 For instance, Inv. McLeod interviewed JT, who was hired by Flamingo Eye to
11 provide dayhab services for a number of recipients. On July 19th 2016 (**Count 7**) JT
12 wrote on his dayhab note that he took both Jane Doe 1 and John Doe together to the
13 baseball fields for three hours of exercise, which should have constituted group dayhab
14 services paid by Medicaid \$7.32 per 15 minutes, per recipient under code T2021HQ
15 (\$29.28 per person per hour). Upper management in Flamingo Eye used JT's dayhab
16 note to fraudulently bill Medicaid for two separate *single* dayhab rates for Jane Doe 1 and
17 John Doe on that day, paid by Medicaid at \$10.46 per 15 minutes, per recipient under
18 code T2021 (\$41.84 per person per hour). Margaret Williams was then paid personally at
19 the inflated rate. The ALH was not approved to provide group dayhab services to either
20 Jane Doe 1 or John Doe at all, however even if the ALH were approved, Williams'
21 billing would constitute fraud because she was paid the inflated rate for services she did
22 not actually provide.
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1 Similarly, on July 25th, 2016 (**Count 6**) JT wrote on his dayhab note that he took
2 Jane Does 2 and 3 out on group dayhab, where they got a fountain soda, went to the lake
3 for a walk, and went to watch the airplanes take off at the airport. Their group dayhab
4 trip was interrupted by a physical fight between the two women. Again upper
5 management in Flamingo Eye used JT's dayhab note to bill Medicaid for a full three
6 hours of two separate *single* day hab rates for Jane Does 2 and 3. Margaret Williams was
7 then paid the inflated rate.
8

9 JT further stated to Inv. McLeod that, pursuant to instruction by upper
10 management, nearly 100% of his dayhab notes were fabricated to one degree or another,
11 with about 50% completely fabricated because he did not do dayhab at all for that day.
12 JT stated that he would routinely simply copy-and-paste old dayhab notes per instructions
13 from upper management.
14

15 On April 5th, 2016 (**Count 9**) Wilson Esapa wrote that he took Jane Doe to the
16 Fifth avenue mall for dayhab from 8:30-9:15am, which is an impossibility because the
17 mall was closed at that time. Margaret Williams was paid for single dayhab for Jane Doe
18 for that day.
19

20 On December 14th, 15th and 16th, 2014 (**Count 10**), Wilson Esapa wrote that he
21 took John Doe to the YMCA for gym activities for his dayhab. A records check by the
22 YMCA business records custodian established that John Doe only checked into the
23 YMCA on December 15th, and not the 14th or 16th. Margaret Williams was paid for
24 single hayhab for John Doe on those days.
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1 In addition to dayhab records, ALHs are required to keep detailed residential
2 records for billing. On August 17th, 2014 (**Count 8**) a single staff member was present
3 during the whole day shift to oversee the residents of Viburnum House. Pursuant to the
4 POCs of the residents of Viburnum, including Jane Doe 1 and John Doe's POCs, at least
5 two staff members are required to be in Viburnum at any given time, with Jane Doe 1 and
6 her staff member living 24/7 in a separate private duplex-style residence. Margaret
7 Williams was paid for group residential rate for John Doe but also billed the single
8 residential rate for Jane Doe 1, which is fraud for two reasons, because the service that
9 was provided (group home) did not follow Jane Doe 1's POC and the service billed
10 (single home) was not a service actually provided. Similarly, on Nov. 7th, 2015 (**Count**
11 **11**), the night one of the residents murdered the staff member, the decedent was the only
12 staff member overseeing the six members of Viburnum House. Margaret Williams was
13 paid for group residential rate for John Doe but also billed the single residential rate for
14 Jane Doe 1, which again violated her POC and was not a service actually provided.

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18 In addition to dayhab and residential records, ALHs, as "mandatory reporters," are
19 required by statute, regulation and POC to report to state authorities whenever there is a
20 "critical incident." The levels of critical incidents and levels of required responses are
21 defined differently in statute, regulation, and plan of care, however emergency situations
22 must be responded to reasonably under 7 AAC 75.290 and any incident involving EMS
23 response must be reported to DHSS under 7 AAC 130.224. These critical incident
24 reports ("CIRs") must typically be sent to DHSS within 24 hours of a critical incident.

1 Following the Nov. 7th, 2015 murder, DHSS began an investigation into Flamingo Eye,
2 LLC for licensing purposes. That official licensing investigation included appeals,
3 licensing actions, and other official DHSS proceedings, and continues to this date as of
4 the writing of these charges. Following the Nov. 7th, 2015 murder, Flamingo Eye, LLC
5 was also aware of MFCU's investigation into the ALHs and Medicaid billing, including
6 seizing computer evidence from the ALHs in Aug. 2016. Following the licensing action,
7 Williams, d/b/a Flamingo Eye, LLC, requested an ALJ hearing, which would have
8 included sworn testimony in front of a judicial officer. On or about Sep. 23rd, 2016
9
10 **(Counts 5 and 12)** a critical incident occurred at Viburnum house where John Doe 2 was
11 found on the floor unable to move at about 6am. Rather than call 911, staff called Wilson
12 Esapa. Wilson Esapa arrived several minutes later and waited several more minutes
13 before calling 911. EMS arrived at about 7am and took John Doe 2 to the hospital. The
14 next day, Esapa created a CIR for DHSS that stated the staff at the ALH immediately
15 called 911 first, prior to calling him. Esapa then delivered that CIR with the false
16 statement to DHSS. Esapa then instructed the staff members to alter their own personal
17 notes and residential records. Staff refused, and became concerned with Esapa's
18 demands. Two staff members – JT and TL – independently and separately recorded
19 Esapa telling staff to change the residential records. Esapa stated Williams and Kallon
20 told him that the residential records needed to match the CIR, because the State had
21 recently collected several documents from the ALH. The documents related to the CIR
22 needed to match otherwise "it would be a problem for the company" when the State sees

1 “the story is different.” JT delivered his recording, and TL delivered both her recording
2 and the true residential records to MFCU Inv. McLeod. Inv. McLeod then compared the
3 true residential records to the false CIR supplied to DHSS by Esapa and confirmed the
4 discrepancy. DHSS Investigator Chris Terry later stated that if DHSS had received the
5 true facts in the CIR, that information would have been relevant to and admissible in the
6 licensing action, including in front of the ALJ.

8 Throughout the course of the dozens of interviews Investigator McLeod
9 conducted, a common theme was that low-level staff members would complain that
10 Flamingo Eye, LLC was not providing the required services for the recipients, or was
11 providing unsafe services for the recipients. Margaret Williams, Donald Kallon, Princess
12 Turay, and Wilson Esapa would field those complaints, but tell the staff members that
13 they needed the paperwork the staff members filled out to match the Medicaid bills, so no
14 matter what the staff members needed to write down that they provided the services. By
15 way of example, JT stated that the would often not take recipients out on dayhab because
16 they were acting up, or that he would come home early or leave late and not do the full
17 three hours, however Williams, Kallon, Turay and Esapa all told him he needed to fill out
18 the paperwork saying he did three hours for everybody so that they could bill the
19 maximum number of hours at the inflated rates for every recipient. By way of another
20 example, MF cared for another recipient (Jane Doe 4), the sole resident at Stanford
21 House, for a period of time. If MF completed her documentation truthfully, upper
22 management would call her up and instruct her to change the documentation to reflect the

1 maximum billing. ST stated that she was assigned to Jane Doe 1's one-on-one care for
2 about one month, but later quit after upper management threatened to fire her if she did
3 not complete false dayhab notes. ST stated that Jane Doe went to dayhab about once per
4 week, and otherwise the dayhab notes were falsified pursuant to Princess's, Donald's and
5 Margaret's instruction. JA stated that Margaret Williams told her to go back and
6 fraudulently complete two months of dayhab notes for another recipient so that Williams
7 could get paid. KH stated that upper management gave her instructions to "tell the
8 detectives" that Jane Doe was living downstairs, alone, with one-on-one care because
9 that's how they were billing, despite Jane Doe living in the main house with the five
10 other recipients. CC stated that she routinely observed dayhab staff come to the house,
11 sleep or otherwise not take the recipients out for dayhab, and then fraudulently complete
12 dayhab notes. CC stated she reported this to Williams, Turay and Kallon, who then
13 instructed her to send the dayhab notes to Kallon.

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17 Documentation and staff interviews also supported probable cause for many other
18 areas of fraud and illegal business practices, such as inappropriate medication
19 distribution, retaining recipient monthly stipends, illegal use of chemical restraints upon
20 the recipients, inadequate staff training, multiple violations of the critical incident
21 reporting requirements, HIPAA violations, fire drill and safety violations, etc. Inv.
22 McLeod found almost all parts of Flamingo Eye, LLC's business operations were at least
23 partially fraudulent or violative of the statutes or regulations.

1 Inv. McLeod’s investigation revealed that Flamingo Eye, LLC’s business practices
2 were based substantially on fraudulent billing to Medicaid, and the fraud was
3 orchestrated by Flamingo Eye, LLC’s sole owner Margaret Williams, upper management
4 Princess Turay and Donald Kallon, and with the help of Wilson Esapa. The business
5 model was to house vulnerable disabled adults approved for Medicaid funded care, not
6 provide that care at all or over-report the level of care provided, and fraudulently bill
7 Medicaid. At any given time, Flamingo Eye was housing approximately 10-15 such
8 vulnerable adults. Since 2012, Ms. Williams was paid an average of approximately \$1.45
9 million dollars per year from Medicaid for these services.
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11

12 Dated at Anchorage, Alaska, this ____ day of March, 2017.

13
14 JAHNA LINDEMUTH
15 ATTORNEY GENERAL

16 By: _____
17 Eric Senta
18 Assistant Attorney General
19 Alaska Bar No. 1011091
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