

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

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6
7 IRENE D. SUSI
8 DOB: 01/03/1968
9 APSIN ID: 7346402
10 DMV NO.: 7239381 AK
11 ATN: 115745535

12 CRISTINA D. YAMBAO
13 DOB: 05/20/1966
14 APSIN ID: 6531290
15 DMV NO.: 6531290 AK
16 ATN: 115745499

17 Defendants.

18 No. (Irene D. Susi)

19 No. (Cristina D. Yambao)

20 INFORMATION

21 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)
22 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
23 crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court.
24 The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990:

25 Count I - AS 47.05.210(a)(1) Fel C

26 Medical Assistance Fraud

27 Irene D. Susi - 001, Cristina D. Yambao - 001

Count II - AS 47.05.210(a)(5)

Medical Assistance Fraud

Irene D. Susi - 002, Cristina D. Yambao - 002

Count III - AS 47.05.210(a)(5)

Medical Assistance Fraud

Irene D. Susi - 003, Cristina D. Yambao - 003

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Count IV - AS 47.05.210(a)(5)
Medical Assistance Fraud
Irene D. Susi - 004

Count V - AS 47.05.210(a)(5)
Medical Assistance Fraud
Irene D. Susi - 005

THE DISTRICT ATTORNEY CHARGES:

COUNT I

That in the Third Judicial District, State of Alaska, on or between December 2010 and January 2015, at or near Anchorage, IRENE D. SUSI AND CRISTINA D. YAMBAO 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, and the value of the benefit was between \$500 and \$25,000. 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 in the Third Judicial District, State of Alaska, on or between December 8, 2010 and February 6, 2011, at or near Anchorage, IRENE D. SUSI AND CRISTINA D. YAMBAO 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.

COUNT III

That in the Third Judicial District, State of Alaska, on or between April 11, 2012 and June 5, 2012, at or near Anchorage, IRENE D. SUSI AND CRISTINA D. YAMBAO knowingly made a false entry or falsely altered a medical assistance record.

1 All of which is a Class A Misdemeanor offense being contrary to and in violation of AS
2 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

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4 **COUNT IV**

5 That in the Third Judicial District, State of Alaska, on or between August 10, 2011 a
6 nd October 4, 2011, at or near Anchorage, IRENE D. SUSI knowingly made a false entry or
7 falsely altered a medical assistance record.

8 All of which is a Class A Misdemeanor offense being contrary to and in violation of AS
9 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

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11 **COUNT V**

12 That in the Third Judicial District, State of Alaska, on or between December 29, 2
13 014 and January 25, 2015, at or near Anchorage, IRENE D. SUSI knowingly made a false entry
14 or falsely altered a medical assistance record.

15 All of which is a Class A Misdemeanor offense being contrary to and in violation of AS
16 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

17 The undersigned swears under oath this Information is based upon a review of
18 police report 0674097 submitted to date.

19
20 **BAIL INFORMATION**

21 Dated at Anchorage, Alaska, this ____ day of November, 2017.

22
23 **JAHNA LINDEMUTH**
ATTORNEY GENERAL

24
25 By: _____
26 Jenna L. Gruenstein
27 Assistant Attorney General
Alaska Bar No. 0912086

Department of Law, Criminal Division

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