

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

STATE OF ALASKA,)
)
 Plaintiff,)
)
 vs.)
)
 HEATHER CHRISTINA PLATTER,)
 DOB: 8/23/1981)
 APSIN ID: 7570132)
 DMV NO. 7370682 AK)
 ATN: 107-504-667)
)
 Defendant.)
)
 _____)
 Case No. 3HO-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 C
Medical Assistance Fraud
Heather Christina Platter - 001

Count II - AS 47.05.210(a)(B)(5)
Medical Assistance Fraud
Heather Christina Platter - 002

THE OFFICE OF SPECIAL PROSECUTIONS AND APPEALS CHARGES:

Count I

That on or about September 16, 2012 through December 29, 2012, at or near Homer in the Third Judicial District, State of Alaska, HEATHER CHRISTINA PLATTER, 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 September 16, 2012 through December 29, 2012, at or near Homer in the Third Judicial District, State of Alaska, HEATHER CHRISTINA PLATTER, 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)(B)(5) and against the peace and dignity of the State of Alaska.

Probable Cause:

The undersigned swears under oath this Information is based upon a review of investigative reports submitted to date. On January 30, 2013, Medicaid Fraud Control Unit (MFCU) investigator Lance Anderson received an investigative report and supportive documents from Jackie Buckley, Executive Director of ResCare in Anchorage. ResCare is a business that employs Personal Care Attendants (PCAs). PCAs are individuals that Medicaid pays to provide home-based care services to Medicaid recipients, allowing the recipient to stay in their home as opposed to a nursing home setting. Ms. Buckley reported a case in Homer that appeared to be fraudulent billing by PCA Heather Platter who was providing PCA services to Charlotte Carper of Homer.

On February 19, 2013, Investigator Anderson traveled to Homer with James Drayton, an investigator with Health and Social Service, Provider Quality Assurance. Investigator Anderson collected copies of timesheets submitted by Platter and employment documents, including an acknowledgement by Platter that one example of “fraud” was providing false billing information. Investigators Anderson and Drayton interviewed the recipient, Charlotte Carper, regarding the services provided by Platter. Carper stated that she informed Platter to only bill Medicaid for hours of

service she actually provided. Carper became concerned when Platter started arriving to work late and not totaling the weekly hours on her timesheet. Carper later learned from ResCare that Platter was actually billing all of the hours that Carper was authorized for each week despite not providing that many hours of service.

Carper reviewed the timesheets collected by Investigator Anderson and confirmed her signature on the timesheets. Carper, however, pointed out numerous fraudulent entries for specific dates of service claimed by Platter. Specifically, Carper pointed out that Platter only worked one weekend day, but billed Medicaid for a total of 16 weekend days between September 16, 2012 and December 29, 2012. Platter also billed from November 22-23, 2012, but Mr. Carper was present and Platter did not provide services on these days. Platter also billed for services on December 17-20, 2012 and December 24 and 26, 2012, which were again days that Mr. Platter was present.

Investigators Anderson and Drayton next contacted Platter and conducted a recorded interview. Platter initially stated that Carper told her to bill 40 hours per week so that there would be no reduction in service when her daughter returned. Platter later admitted to fraudulently billing Medicaid by entering hours on her timesheet that she did not actually work after Investigator Anderson confronted Platter with the information he received from Carper and ResCare. Platter stated that she billed Medicaid for services not provided as she was financially stressed. Carper was able to identify a total of 145 hours of fraudulent billing by Platter resulting in a loss to Medicaid of \$3,381.40.

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

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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
April 2013, at Anchorage, Alaska.

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