

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

STATE OF ALASKA, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 SUSAN SOOK CHO, )  
 aka: KWANGSOOK CHO, )  
 DOB: 10/15/1958 )  
 APSIN ID: 5265421 )  
 DMV NO. 5265421 AK )  
 ATN: 114-356-232 )  
 )  
 Defendant. )  
 )

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Case No. 3AN-13- CR.  
3AN-13-459 SW

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  
Susan Sook Cho - 001

Count II - AS 47.05.210(a)(5) Misd A  
Medical Assistance Fraud  
Susan Sook Cho - 002

THE OFFICE OF SPECIAL PROSECUTIONS AND APPEALS CHARGES:

**Count I**

That on or about January 2011 through December 2012, at or near Anchorage in the Third Judicial District, State of Alaska, SUSAN SOOK CHO, 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 January 2011 through December 2012, at or near Anchorage in the Third Judicial District, State of Alaska, SUSAN SOOK CHO, 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 licensed and registered health care providers that the Alaska Medicaid Program pays to provide home based healthcare 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 healthcare 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. The MFCU initiated a medical assistance fraud investigation based on the above allegations.

In February 2013, the MFCU initiated a joint investigation with Program Integrity (PI) into the billing practices of Good Faith. A number of PCAs were identified by PI as being high billers, including an office employee by the name of Susan Cho. MFCU investigators requested travel records from Agent Timothy Brady with Immigration and Customs Enforcement (ICE) for Susan Cho and her recipients. Border crossing records revealed that Susan Cho traveled from Seattle, Washington to Korea on October 9, 2012 and did not return until October 25, 2012.

On March 19, 2013, MFCU executed a search warrant at Good Faith seizing numerous recipient and PCA files, including records pertaining to Susan Cho. A review of Cho's files revealed that she billed Medicaid for providing PCA services to two different recipients during the time that she was out of the country. Medicaid records also revealed that Cho was billing for providing PCA services at the same time that PCA Suzi Choi was billing Medicaid for providing respite care to recipient Chang Choi on October 14 & 21, 2012. Medicaid paid \$571.34 for PCA services while Cho was out of the country.

Timesheets submitted by Cho for purposes of billing Medicaid for PCA services in 2011 revealed numerous incidence of overlapping time in which Cho was billing Medicaid for providing services to two different recipients simultaneously. In 2011, Medicaid paid \$5,168 for PCA services that could not be provided due to duplicate timesheets. A review of timesheets submitted for 2012 revealed a total of \$4,632.81 in duplicate bills submitted to Medicaid for alleged PCA services.

On June 13, 2013, Susan Cho was interviewed regarding her Medicaid billings. Cho admitted that she went to Korea last year from October 9, 2012 through October 24-25, 2009. Cho also identified the signatures on the timesheets as belonging

to her and her parents. Cho claimed that submitting the timesheets was a mistake and that she wanted to pay the money back. Cho was then asked about the overlapping billing in 2011 and 2012 and she claimed that she would provide “back-up” PCA services and bill for those. Cho claimed that she did not know that overlapping time was fraud. In total, Medicaid overpaid \$10,372.44 for PCA services that Cho alleged to provide.

Dated at Anchorage, Alaska, this \_\_\_\_ day of July, 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  
July 2013, at Anchorage, Alaska.

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