

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

STATE OF ALASKA,)
)
Plaintiff,)
)
vs.)
)
JOMILYNE PAULE MIRANDA,)
DOB: 4/26/1993)
APSIN ID: 7398996)
DMV NO. 7272709 AK)
ATN: 114-356-124) Case No. 3AN-13- CR
)
JOANNA PAULE MIRANDA,)
DOB: 1/29/1992)
APSIN ID: 7398999)
DMV NO. 7272711 AK)
ATN: 114-356-151) Case No. 3AN-13- CR
)
Defendants.)
)

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
Jomilyne Paule Miranda - 001
Joeanna Paule Miranda - 001

Count II - AS 47.05.210(a)(5) Misd A
Medical Assistance Fraud
Jomilyne Paule Miranda - 002
Joeanna Paule Miranda - 002

THE OFFICE OF SPECIAL PROSECUTIONS AND APPEALS CHARGES:

Count I

That on or about May 5, 2012 through May 26, 2012, at or near Anchorage in the Third Judicial District, State of Alaska, JOMILYNE PAULE MIRANDA and JOEANNA PAULE MIRANDA, 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 May 5, 2012 through May 26, 2013, at or near Anchorage in the Third Judicial District, State of Alaska, JOMILYNE PAULE MIRANDA and JOEANNA PAULE MIRANDA, 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.

The Program Integrity (PI) Unit of the Department of Health and Social Services (DHSS) referred an investigation to the Medicaid Fraud Control Unit (MFCU) involving personal care attendant (PCA) agency Good Faith Services, LLC. (Good Faith) and employees of Good Faith for suspected Medicaid fraud. During the course of the investigation, MFCU investigators learned from confidential source #3 that Medicaid recipient Joedie Miranda's PCAs billed Medicaid for providing PCA, respite

and transportation services to Joedie, when he was outside of the United States to the Philippines.

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 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.

Investigator Mark Payne's review of Medicaid records for Joedie Miranda revealed that Joedie is a 45 year-old Medicaid recipient authorized to receive 40 hours of PCA services per week, 10 hours of respite services (designed to provide relief to unpaid caregivers) and two units of transportation with escort per week. Jomilyn Miranda and Joeanna Miranda are enrolled PCAs with the Alaska Medicaid program working for Good Faith and providing PCA, respite and transportation services to Joedie.

In December 2011, DHSS sent out a notice that it would no longer be approving Medicaid expenditures for services performed while traveling outside of the country due to a clarification by the Centers for Medicare and Medicaid Services that 42 CFR 431.52 prohibits such expenditures. Border crossing records from ICE revealed that PCAs Joeanna Miranda and Jomilyne Miranda traveled with Medicaid recipient Joedie Miranda out of the country from May 5, 2012 through May 26, 2012. A review of Medicaid billing records revealed that Joeanna and Jomilyne Miranda billed for providing Medicaid services to Joedie Miranda during this time period.

Jomilyne Miranda was interviewed by MFCU investigators regarding her travel to the Philippines in May 2012. Jomilyne admitted to traveling to the Philippines from May 5-26, 2012 and to billing for providing PCA and respite services during this

time. Jomilyne stated that she did not know that it was wrong and that she accompanied her father to the Philippines and cared for him the entire time. Medicaid was billed a total of \$3,318.00 for PCA and respite expenditures during the time that Jomilyne and her father were in the Philippines.

Joeanna Miranda was also interviewed about her travel to the Philippines. Joeanna admitted to traveling to the Philippines from May 5-26, 2012 and to falsifying and signing the transportation logs in which she claimed to have provided services to her father between May 5-26, 2012. A review of the logs submitted to Good Faith reveal that Joeanna claimed to have been transporting her father around the Anchorage, Alaska area when she and her father were actually in the Philippines. Medicaid was billed a total of \$601.80 for transportation services during the time that Joeanna and her father were in the Philippines.

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