

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

STATE OF ALASKA, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 FERDIE TAN ODRON, )  
 DOB: 11/28/1966 )  
 APSIN ID: 6761919 )  
 DMV NO. 6761919 AK )  
 ATN: 114-356-502 ) Case No. 3AN-14- CR.  
 )  
 JERLYN S. ODRON, )  
 aka: MARIA JERLYN ODRON, )  
 DOB: 1/16/1970 )  
 APSIN ID: 6459198 )  
 DMV NO. 6459198 AK )  
 ATN: 114-356-511 ) Case No. 3AN-14- 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:

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

Medical Assistance Fraud

Ferdie Tan Odron - 001

Jerlyn S. Odron - 001

Count II - AS 47.05.210(a)(5) Mis A

Medical Assistance Fraud

Ferdie Tan Odron - 002

Jerlyn S. Odron - 002

THE OFFICE OF SPECIAL PROSECUTIONS AND APPEALS CHARGES:

**Count I**

That on or about March 1, 2010 through May 28, 2012, at or near Anchorage in the Third Judicial District, State of Alaska, FERDIE TAN ODRON and JERLYN S. ODRON, 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 March 1, 2010 through May 28, 2012, at or near Anchorage in the Third Judicial District, State of Alaska, FERDIE TAN ODRON and JERLYN S. ODRON, 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 MFCU received information from a confidential source that Ferdie Odron and Jerlyn Odron billed Medicaid for providing personal care attendant (PCA) services while traveling out of state and internationally. MFCU investigator Katie Paakki contacted Homeland Security Investigation Agent Tim Brady, who informed Paakki that the Odrons travelled internationally on four different occasions while billing Medicaid for providing services to Medicaid recipient N.O. Travel records further indicated that Medicaid recipient N.O. traveled internationally on two occasions, one time without Ferdie and/or Jerlyn.

PCAs are enrolled in Medicaid as healthcare providers. The Alaska Medicaid Program pays PCAs to provide services of daily living to Medicaid recipients, which will allow Medicaid recipients to stay in their home rather than be placed in an assisted living home type setting. Medicaid recipients are evaluated for medical needs by an employee of the Department of Health and Social Services and the recipient is then authorized to hire a PCA to provide home based healthcare services. 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.

Prior to December 23, 2011, Alaska Medicaid would authorize payment for PCA services while travelling internationally if the travel was pre-approved. On December 23, 2011, the Department of Health sent out a notice to all Medicaid providers that federal law prohibits Medicaid expenditures for services outside of the United States.

The Department of Health and Social Services assessed N.O. with respect to her need for PCA services on January 8, 2010. N.O. departed the country the very next day for the Philippines and was out of the country until March 23, 2010. On March 1, 2010, Jerlyn and Ferdie Odron began billing Medicaid for providing PCA services to N.O. Jerlyn and Ferdie each submitted timesheets for PCA services from March 1, 2010 through March 23, 2010. Immigration records show that Jerlyn was in the United States during this time and N.O. was in the Philippines. Jerlyn billed Medicaid for providing PCA services, respite services and transportation services to N.O. Jerlyn claimed to be providing assistance with daily living tasks as well as driving her mother-in-law to church, the pharmacy, to her home, Costco, Fred Meyers and Carrs. Jerlyn billed Medicaid a total of \$1,489.58 for services not provided and Ferdie billed Medicaid a total of \$1,532.48 for services not provided during this time.

Immigration records revealed that Ferdie and Jerlyn both traveled internationally from February 14, 2011 through February 18, 2011. A review of timesheets submitted to the Medicaid provider revealed that both Ferdie and Jerlyn

billed Medicaid for providing PCA and respite services to N.O. while immigration records reveal that N.O. was still in the United States. In total, Ferdie billed Medicaid \$346.13 and Jerlyn billed Medicaid \$438.02 for services that were not performed.

Ferdie and N.O. travelled internationally from September 4, 2011 through September 16, 2011. Jerlyn submitted timesheets for providing respite and chore services during this period of time for a total loss to Medicaid of \$2,104.10. Ferdie billed Medicaid while travelling internationally with N.O. for a total of \$1,708.40 which is prohibited under both state and federal regulations.

Immigration records again showed that Ferdie and Jerlyn travelled internationally from May 25, 2012 through May 28, 2012 without N.O. Ferdie billed Medicaid a total of \$221.20 and Jerlyn billed Medicaid a total of \$243.96 for services not provided.

An audit of timesheets submitted by Ferdie and Jerlyn from August 31, 2011 through January 28, 2012 revealed that Ferdie and Jerlyn Odron were billing for providing simultaneous services resulting in one to three hours a day of overlap billing. There was a total of 211 hours of overlap billing during this time period resulting in an overpayment of \$4,597.52 of which \$1,411.12 is attributable to Ferdie and \$3186.40 is attributable to Jerlyn. The fraudulent billing by Ferdie and Jerlyn Odron totaled \$15,646.59 of which Ferdie's individual total was \$8,184.53 and Jerlyn's total was \$7,462.06.

Dated at Anchorage, Alaska, this \_\_\_\_ day of February, 2014.

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  
March 2014, at Anchorage, Alaska.

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