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

STATE OF ALASKA,

Plaintiff,

vs.

NURKI ARELIS CAMPOS  
DOB: 04/20/1966  
APSIN ID: 6533525  
DMV NO.: 6533525 AK  
ATN: 114677532

BRIGIDA ROSALBA CASTILLO  
DOB: 01/25/1971  
APSIN ID: 7115379  
DMV NO.: 7064965 AK  
ATN: 114677541

GRISELDA MERCEDES ANDUJAR  
DOB: 12/10/1956  
APSIN ID: 5578971  
DMV NO.: 5578971 AK  
ATN: 114677559

OBADIS P CABRERA  
DOB: 03/26/1986  
APSIN ID: 7038158  
DMV NO.: 7007266 AK  
ATN: 114677595

ISVERT PEREZ  
DOB: 05/30/1975  
APSIN ID: 7124291  
DMV NO.: 7071735 AK  
ATN: 114677577

REVECA M MERCEDES DAVID  
DOB: 07/30/1966  
APSIN ID: 8155944  
DMV NO.: 7497463 AK  
ATN: 114677586

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

Nurki Arelis Campos - 001, Brigida Rosalba Castillo - 001, Griselda Mercedes Andujar - 001, Obadis P Cabrera - 001, Reveca M Mercedes David - 001

Count II - AS 47.05.210(a)(5)  
Medical Assistance Fraud

Nurki Arelis Campos - 002, Brigida Rosalba Castillo - 002, Griselda Mercedes Andujar - 002, Obadis P Cabrera - 002, Reveca M Mercedes David - 002

Count III - AS 47.05.210(a)(1)Fel C  
Medical Assistance Fraud  
Isvert Perez - 001

Count IV - AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Isvert Perez - 002

THE OFFICE OF SPECIAL PROSECUTION CHARGES:

COUNT I

That in the Third Judicial District, State of Alaska, on or about June 12, 2012 through February 23, 2013, at or near Anchorage, NURKI ARELIS CAMPOS, BRIGIDA ROSALBA CASTILLO, GRISELDA MERCEDES ANDUJAR, OBADIS P CABRERA, AND REVECA M MERCEDES DAVID, 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 Felony class C offense being contrary to and in violation of 47.05.210(a)(1) and against the peace and dignity of the State of Alaska.

COUNT II

1 That in the Third Judicial District, State of Alaska, on or about June 12, 2012  
2 through February 23, 2013, at or near Anchorage, NURKI ARELIS CAMPOS,  
3 BRIGIDA ROSALBA CASTILLO, GRISELDA MERCEDES ANDUJAR, OBADIS P  
4 CABRERA, AND REVECA M MERCEDES DAVID,, knowingly made a false entry or  
5 falsely altered a medical assistance record.

6 All of which is a Misdemeanor class A offense being contrary to and in violation  
7 of 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

8 **COUNT III:**

9 That in the Third Judicial District, State of Alaska, on or about May 31, 2011  
10 through July 3, 2013, at or near Anchorage, ISVERT PEREZ, knowingly submitted or  
11 authorized the submission of a claim to a medical assistance agency for property,  
12 services, or a benefit with reckless disregard that the claimant is not entitled to the  
13 property, services, or benefit.

14 All of which is a Felony class C offense being contrary to and in violation of  
15 47.05.210(a)(1) and against the peace and dignity of the State of Alaska.

16 **COUNT IV:**

17 That in the Third Judicial District, State of Alaska, on or about May 31, 2011  
18 through July 3, 2013, at or near Anchorage, ISVERT PEREZ, knowingly made a false  
19 entry or falsely altered a medical assistance record.

20 All of which is a Misdemeanor class A offense being contrary to and in violation  
21 of 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

22  
23 The undersigned swears under oath this Information is based upon a review of  
24 Medicaid Fraud Control Unit report 0222756 submitted to date.

25  
26 The Medicaid Fraud Control Unit (MFCU) received a fraud referral from Hearts  
27 and Hands of Care alleging that two Medicaid recipients were travelling internationally

1 while their personal care attendants (“PCAs”) were billing Medicaid for allegedly  
2 providing home healthcare services to the recipients. PCAs are enrolled in Medicaid as  
3 home based healthcare providers. The Alaska Medicaid Program pays PCAs to provide  
4 services of daily living to Medicaid recipients, which will allow Medicaid recipients to  
5 stay in their home rather than be placed in an assisted living home type setting.

6 The Alaska Medicaid Program is administered by the Alaska Department of  
7 Health and Social Services (DHSS). DHSS first evaluates recipients to determine their  
8 medical needs and authorizes recipients to hire a PCA to provide home healthcare  
9 services. The PCA is then supposed to provide the authorized services to recipients. Next,  
10 the PCA and recipient or the recipient’s power of attorney signs a timesheet attesting that  
11 the authorized work was in fact done and submits it to an agency, which, in turn, submits  
12 claims to DHSS. Finally, Medicaid pays approximately \$24 an hour to the agency and the  
13 agency must pay the PCA at least half of that amount.

14 Prior to December 23, 2011, Alaska Medicaid would authorize payment for PCA  
15 services provided by the PCA to the recipient while both were travelling internationally if  
16 the travel was pre-approved. On December 23, 2011, the Department of Health sent out a  
17 notice to all Medicaid providers that federal law prohibits Medicaid expenditures for  
18 services outside of the United States. See 7AAC 125.060(c) and 42 C.F.R. sec.  
19 431.52(b).

20 One type of Medicaid fraud investigated by MFCU is known as “travel billing.”  
21 An offender commits travel billing fraud by submitting timesheets claiming to have  
22 provided PCA services that cannot possibly have been provided because the provider, or  
23 the recipient, or both, are traveling outside the United States at the time of the purported  
24 service.

25 Hearts and Hands of Care employee T.A. reported that Medicaid recipients Nurki  
26 Campos and L.R. were traveling outside of the United States in the Dominican Republic  
27 at the same time as their PCAs were billing Medicaid for providing PCA services in

1 violation of Medicaid regulations. Hearts and Hands of Care spoke with Nurki Campos  
2 who confirmed that she and L.R. did in fact travel to the Dominican Republic.

3 MFCU investigators requested international travel records from Immigration and  
4 Customs Enforcement and confirmed that both Campos and L.R. were out of the country  
5 from February 11, 2013 through February 23, 2013. Travel information further  
6 confirmed that Campos was out of the country from June 12, 2011 through July 10, 2011.  
7 A review of Medicaid billing records revealed that five different Medicaid providers  
8 billed for allegedly providing PCA services to Nurki Campos while she was travelling in  
9 the Dominican Republic. Two of the Medicaid providers billed for allegedly providing  
10 services to L.R. during travel periods and one billed Medicaid for allegedly providing  
11 services to Medicaid recipient T.W. during two periods of travel.

12 Medicaid investigators interviewed Nurki Campos regarding the services she  
13 allegedly received while travelling internationally. Campos admitted to travelling to the  
14 Dominican Republic in June 2012 to visit her ailing father. She admitted to pre-signing  
15 timesheets and giving them to her juvenile daughter. The various care providers that  
16 Medicaid was paying to provide Campos with services of daily living would then come in  
17 and watch Campos' juvenile daughter while Campos was in the Dominican Republic.  
18 Campos reviewed the timesheets and confirmed her signatures on the timesheets. Campos  
19 claimed that she believed it was ok for the providers to bill Medicaid for watching her  
20 child as the providers were helping. Campos also admitted to traveling in 2013.  
21 Medicaid was billed a total of \$6,265.52 and paid a total of \$4,692.33 for services that  
22 were not provided.

23 PCA Griselda Andujar is Campos' sister and the daughter of L.R. She submitted  
24 timesheets to Hearts and Hands of Care for a total of \$2,241.68 for allegedly providing  
25 PCA services to Campos from June 12, 2012 through July 10, 2012. Griselda Andujar  
26 was interviewed at her place of and confirmed her signatures on the timesheets  
27 submitted, stated that she was watching Campos' daughter during the time in question,

1 and admitted that it was wrong to submit timesheets and get paid for PCA services she  
2 did not complete.

3 PCA Obadis Cabrera submitted timesheets to Hearts and Hands of Care for a total  
4 of \$1,113.60 for allegedly providing respite services to Campos from July 1-10, 2012.  
5 Cabrera admitted to submitting timesheets for services that were not provided. Cabrera  
6 stated that Campos encouraged him to bill the hours while she went on vacation to the  
7 Dominican Republic and that it was wrong to bill for services not provided. Cabrera  
8 stated that he was babysitting his cousin (Nurki Campos' juvenile daughter) during the  
9 time that Campos was in the Dominican Republic.

10 PCA Brigida Castillo submitted timesheets to Hearts and Hands of Care for a total  
11 of \$2,586.40 for allegedly providing PCA services to both Campos and L.R. from June  
12 12, 2012 through July 10, 2012 (Nurki) and again from February 11, 2013 through  
13 February 23, 2013 (Nurki and L.R.). Castillo admitted to MFCU investigators that she  
14 billed for providing PCA services while Campos was out of the country, but also claimed  
15 to have provided care for Campos' daughter. Castillo then indicated that she travelled  
16 with recipient R.L. to the Dominican Republic in 2013 and provided the authorized  
17 services.

18 PCA Reveca Mercedes David submitted timesheets to Hearts and Hands of Care  
19 for a total of \$1,122.53 for allegedly providing PCA and chore services to Nurki and  
20 PCA services to L.R. during the 2013 trip.

21 PCA Isvert Perez submitted timesheets to Hearts and Hands of Care for a total of  
22 \$1,938.00 for allegedly providing PCA services to T.W. from May 31, 2011 through June  
23 14, 2011 and June 5, 2013 through July 3, 2013 and respite services to Campos from  
24 February 11, 2013 through March 12, 2013. Perez admitted to MFCU investigators that  
25 she submitted fraudulent timesheets for providing respite services for Campos, but that  
26 she was never paid. Perez also admitted to previously taking a trip to the Dominican  
27

1 Republic and could not remember if she was paid for those services. A review of her  
 2 travel records indicated that she in fact billed for this travel period.

3 In total, Medicaid paid \$4,659.33 for the unauthorized service of caring for  
 4 Campos' child while she was on vacation in the Dominican Republic in 2012. Campos  
 5 and L.R.'s Medicaid providers attempted to bill Medicaid a total of \$2,822.78 for PCA  
 6 and respite services for the trip Campos and L.R. took to the Dominican Republic in  
 7 2013. Finally, PCA Perez, in addition to the \$417.60 she attempted to bill for respite  
 8 services provided to L.R. in 2013, was paid a total of \$1,520.40 for PCA services she  
 9 never provided (2011) or was not authorized to provide (2013) to recipient T.W. during  
 10 periods of international travel.

11 **BAIL INFORMATION**

12 Griselda Mercedes Andujar:

13 CONV COURT	CONV DATE	CONV CHARGE	COURT DOCKET	POS ID	FEL	ATN
14 DAN	3/16/93	ASSAULT	93-1156	Y	N	100156812

15 Dated at Anchorage, Alaska, this \_\_\_\_ day of May, 2016.

16  
 17 **CRAIG W. RICHARDS**  
 18 **ATTORNEY GENERAL**

19 By: \_\_\_\_\_  
 20 A. Andrew Peterson  
 21 Assistant Attorney General  
 22 Alaska Bar No. 061002

23 SUBSCRIBED AND SWORN TO before me this \_\_\_\_ day of  
 24 May 2016, at Anchorage, Alaska.

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