

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

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6 FILGIA SABINA PEREZ

7 DOB: 12/30/1955

8 APSIN ID: 7084050

9 DMV NO.: 7040810 AK

10 ATN: 115745643

11 Defendant.

No. 3AN-18-_____ CR
(Filgia Sabina Perez)

12 INFORMATION

13 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)
14 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.
15 The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

16 Count I - AS 47.05.210(a)(1) Fel C
17 Medical Assistance Fraud
18 Filgia Sabina Perez - 001

19 THE OFFICE OF SPECIAL PROSECUTIONS CHARGES:

20 COUNT I

21 That in the Third Judicial District, State of Alaska, on or between March 29, 2017
22 and May 28, 2017, at or near Anchorage, FILGIA SABINA PEREZ, knowingly submitted or
23 authorized the submission of a claim to a medical assistance agency for property, services, or a
24 benefit with reckless disregard that the claimant is not entitled to the property, services, or
25 benefit.

26 All of which is a Class C Felony offense being contrary to and in violation of
27 47.05.210(a)(1) and against the peace and dignity of the State of Alaska.

1 The undersigned swears under oath this Information is based upon a review of
2 police report 0675803 submitted to date.

3 The Medicaid Fraud Control Unit (“MFCU”) received a complaint about a
4 Medicaid Recipient splitting money with her Personal Care Assistants (“PCA”). An
5 investigation revealed one of the Recipient’s PCAs, Filgia Perez, had committed
6 Medicaid travel fraud when she traveled outside the United States with her Medicaid
7 Recipient mother. Perez billed \$4,489.60 for services rendered from 3/29/2017 through
8 5/28/2017, while Filgia and the recipient, A.O., were in the Dominican Republic. A.O. is
9 a close relative of Filgia Perez. When interviewed, Filgia admitted to the foreign travel
10 and admitted she pre-filled the time sheets and gave them to her friend in Anchorage for
11 submission while she was out of the country.

12 The billing was separated into 6 separate signed PCA time sheets which were
13 submitted to Consumer Care Network, the PCA Agency.

14 Filgia’s personnel file contained a “receipt signature sheet” which Filgia had
15 signed indicating she had received a copy of the consumer/employee handbook. The form
16 was dated 6/24/2016. An “employee acknowledgement form” was also inside Filgia’s
17 personnel file and it was signed by Filgia on 6/23/2016. This document states that Filgia
18 acknowledged that she had received a copy of the agency policies and procedures. The
19 form also states that Filgia accepted responsibility for familiarizing herself with the
20 information, seeking clarification of its terms or guidance, where necessary, and
21 complying with the content. A “statement of understanding” form was also inside
22 Filgia’s personnel file. Number four (4) on this document states, “I have reviewed a copy
of and understand the employment policies of Consumer Care Network.”

23 On 10/30/2017, MFCU Investigators received a copy of Consumer Care
24 Networks’ policy and procedures handbook as well as their employee handbook. Page 22
25 of the policy and procedures handbook has a section titled “travel away from assigned
26 duty station.” This section stated that an employee must have all official travel approved
27 by the employee’s supervisor and authorized by the Program director prior to travel. Page

1 24 of the policy and procedures manual discusses fraud to include knowingly billing false
2 time or tasks. Page 13 of the employee manual has a section titled “travel time and
3 mileage.” This section stated that the Consumer Direct PCA program does not
4 compensate for PCA travel time unless such costs are specified in the consumer’s service
5 plan. Page 23 of the employee handbook also discusses fraud in the similar language as
6 the policy handbook.

7 Billing during time away from the home was not authorized. The PCA was
8 required to have all official travel approved by the supervisor and authorized by the
9 program director prior to the travel. This was not done. The total unauthorized billing
10 was \$4,489.60.

11 On 10/30/2017, in an interview with MFCU investigators, Filgia stated she was
12 unaware she could not bill for PCA services when traveling outside the United States.
13 Filgia admitted she left the US on 3/29/2017 with A.O. and they did not return until
14 5/28/2017. MFCU Investigator Williams reviewed each of the 6 time sheets and Filgia
15 initialed the bottom of each form stating each was true and accurate. Filgia confirmed her
16 and A.O.’s signature on the forms. Filgia stated she prefilled all of her PCA timesheets
17 before she left for the trip and she gave them to a friend for submission. Filgia understood
18 the friend would fax the time sheets as they were due since the friend was going to
19 remain in the Anchorage area.

20 Dated at Anchorage, Alaska, this ____ day of October, 2018.

21 JAHNA LINDEMUTH
22 ATTORNEY GENERAL

23
24 By: _____
25 John C. Cagle
26 Assistant District Attorney
27 Alaska Bar No. 1102009