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

STATE OF ALASKA,

Plaintiff,

vs.

NICOLE GENEVIEVE WHITE

DOB: 05/20/1987

APSIN ID: 7470859

DMV NO.: 7324713 AK

ATN: 115745706

Defendant.

Case No. 3AN-19-\_\_\_\_\_ CR

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: None.

Count I – AS 47.05.210(a)(2)  
Medical Assistance Fraud  
Nicole Genevieve White – 001

Count II – AS 47.05.210(a)(2)  
Medical Assistance Fraud  
Nicole Genevieve White – 002

Count III – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 003

Count IV – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 004

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Count V – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 005

Count VI – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 006

Count VII – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 007

Count VIII – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 008

Count IX – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 009

Count X – AS 47.05.210(a)(5)  
Medical Assistance Fraud  
Nicole Genevieve White – 010

THE OFFICE OF SPECIAL PROSECUTIONS CHARGES:

COUNT I

That in the Third Judicial District, State of Alaska, on or about August, 2017, at or near Anchorage, NICOLE GENEVIEVE WHITE knowingly prepared or assisted another person to prepare a claim for submission 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, and the value of the property, services or benefit was greater than \$500. *To Wit: for the care of JH, August 10-31, 2017.*

All of which is a Class C Felony offense being contrary to and in violation of AS 47.05.210(a)(2) and against the peace and dignity of the State of Alaska.

COUNT II

1  
2 That in the Third Judicial District, State of Alaska, on or about August, 2018, at  
3 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly prepared or assisted  
4 another person to prepare a claim for submission to a medical assistance agency for  
5 property, services, or a benefit with reckless disregard that the claimant is not entitled to  
6 the property, services or benefit, and the value of the property, services or benefit was  
7 greater than \$500. *To Wit: for the care of AB, August 10-31, 2017.*

8 All of which is a Class C Felony offense being contrary to and in violation of AS  
9 47.05.210(a)(2) and against the peace and dignity of the State of Alaska.

COUNT III

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11 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
12 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
13 falsely altered a medical assistance record. *To Wit: for the care of JH, August 6-12, 2017.*

14 All of which is a Class A Misdemeanor offense being contrary to and in  
15 violation of AS 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

COUNT IV

16  
17 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
18 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
19 falsely altered a medical assistance record. *To Wit: for the care of JH, August 13-19,*  
20 *2017.*

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

COUNT V

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24  
25 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
26 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
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1 falsely altered a medical assistance record. *To Wit: for the care of JH, August 20-26,*  
2 *2017.*

3 All of which is a Class A Misdemeanor offense being contrary to and in  
4 violation of AS 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

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6 **COUNT VI**

7 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
8 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
9 falsely altered a medical assistance record. *To Wit: for the care of AB, August 27-30,*  
10 *2017.*

11 All of which is a Class A Misdemeanor offense being contrary to and in  
12 violation of AS 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

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14 **COUNT VII**

15 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
16 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
17 falsely altered a medical assistance record. *To Wit: for the care of AB, August 6-12, 2017.*

18 All of which is a Class A Misdemeanor offense being contrary to and in  
19 violation of AS 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

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21 **COUNT VIII**

22 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
23 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
24 falsely altered a medical assistance record. *To Wit: for the care of AB, August 13-19,*  
25 *2017.*

26 All of which is a Class A Misdemeanor offense being contrary to and in  
27 violation of AS 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

COUNT IX

1 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
2 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
3 falsely altered a medical assistance record. *To Wit: for the care of AB, August 20-27,*  
4 *2017.*

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

7  
8 COUNT X

9 That in the Third Judicial District, State of Alaska, on or about August 2018, at  
10 or near Anchorage, NICOLE GENEVIEVE WHITE knowingly made a false entry or  
11 falsely altered a medical assistance record. *To Wit: for the care of AB, August 27-*  
12 *September 2, 2017.*

13 All of which is a Class A Misdemeanor offense being contrary to and in  
14 violation of AS 47.05.210(a)(5) and against the peace and dignity of the State of Alaska.

15 The undersigned swears under oath this Information is based upon a review of  
16 Medicaid Fraud Control Unit (MFCU) investigation report 0688793 submitted to date.

17 In June 2018, the Medicaid Fraud Control Unit ("MFCU") received a complaint  
18 that Nicole White was allegedly engaged in "Travel Billing." Travel Billing is a term used  
19 to describe fraudulent billing practices which include a service provider fraudulently  
20 billing Medicaid for services that could not have been provided because the service  
21 provider was travelling and not physically present at the patient's location during the  
22 period of service.

23 MFCU investigation confirmed that Nichole White did engage in Travel Billing  
24 in August 2017. Defendant billed for \$718.62 in Personal Care Assistant (PCA) services  
25 that she purportedly provided to JH and for \$682.08 in PCA services that she purportedly  
26 provided to AB, from August 10 to August 31 of 2017. Defendant could not have  
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1 provided PCA services to JH and AB because she was overseas, on vacation in Spain,  
2 during the reported time period.

3 MFCU investigation identified time sheets, submitted by Defendant, which  
4 purported to itemize services provided to JH and AB during the time period that  
5 Defendant was in Spain.

6 Defendant submitted four separate timesheets, for Medicaid compensation,  
7 purporting to document PCA services that she provided to JH. One for the week of  
8 August 6 to August 12, 2017, the second for August 13 to August 19, the third for August  
9 20 to August 26, and the fourth for August 27 through August 30.

10 Defendant submitted four separate timesheets, for Medicaid compensation,  
11 purporting to document PCA services that she provided to AB. One for the week of  
12 August 6 to August 12, 2017, the second for August 13 to August 19, the third for August  
13 20 to August 27, and the fourth for August 27 through September 2. Defendant billed  
14 twice for PCA services purportedly provided on August 27 to AB.

15 MFCU Investigator Loughton met with Defendant on July 24, 2018. Defendant  
16 admitted that she was traveling in Spain, away from clients JH and AB, on August 10 and  
17 through August 31 of 2017. Defendant admitted that she submitted timesheets which  
18 represented that she provided PCA services to clients JH and AB on August 10 and  
19 through August 31 of 2017. Defendant admitted that she did not and could not provide  
20 the PCA services reported because she was away from her clients, traveling in Spain.  
21 Defendant agreed that she thought she would get away with anyone learning that she did  
22 not actually provide the reported PCA services.

#### 23 BAIL INFORMATION

24 Per the Alaska Public Safety Information Network, the defendant has no  
25 previous criminal charges in Alaska.  
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Dated at Anchorage, Alaska, this \_\_\_\_ day of January, 2019.

KEVIN G. CLARKSON  
ATTORNEY GENERAL

By: \_\_\_\_\_  
Aaron D. Jabaay  
Assistant Attorney General  
Alaska Bar No. 0611100