

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

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6
7 JESSICA JOY HUFF
8 DOB: 01/31/1975
9 APSIN ID: 6477291
10 DMV NO.: 6477291 AK
11 ATN: 115745841

12 Defendant.

File No. 3KN-19-_____ CR
(Jessica Joy Huff)

13 **INFORMATION**

14 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)
15 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
16 crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court.
17 The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

18 Count I - AS 47.05.210(a)(1)Misd A
19 Medical Assistance Fraud
20 Jessica Joy Huff - 001

21 Count II - AS 47.05.210(a)(5)
22 Medical Assistance Fraud
23 Jessica Joy Huff - 002

24 Count III - AS 11.46.150
25 Theft in the Fourth Degree
26 Jessica Joy Huff - 003

27 Count IV - AS 11.71.040(a)(9)
Misconduct Involving a Controlled Substance in the Third Degree
Jessica Joy Huff - 004

THE OFFICE OF SPECIAL PROSECUTIONS CHARGES:

COUNT I

1 That in the Third Judicial District, State of Alaska, on or about March 9, 2018, at
2 or near Soldotna, JESSICA JOY HUFF knowingly submitted or authorized the
3 submission of a claim to a medical assistance agency for property, services, or a benefit
4 with reckless disregard that the claimant is not entitled to the property, services, or
5 benefit.

6 All of which is a Misdemeanor class A offense being contrary to and in violation
7 of 47.05.210(a)(1) and against the peace and dignity of the State of Alaska.

COUNT II

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10 That in the Third Judicial District, State of Alaska, on or about March 9, 2018, at
11 or near Soldotna, JESSICA JOY HUFF knowingly made a false entry or falsely altered a
12 medical assistance record.

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

COUNT III

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16
17 That in the Third Judicial District, State of Alaska, on or about March 9, 2018, at
18 or near Soldotna, JESSICA JOY HUFF, with intent to deprive another of property or to
19 appropriate property of another to oneself or a third person, obtained the property of
20 another and the value of the property or services is less than \$250, adjusted for inflation
as provided in AS 11.46.982, to wit: 30 1-miligram tablets of Lorazepam.

21 All of which is a class B Misdemeanor offense being contrary to and in violation
22 of AS11.46.150 and against the peace and dignity of the State of Alaska.

COUNT IV

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25 That in the Third Judicial District, State of Alaska, on or about March 9, 2018, at
26 or near Soldotna, JESSICA JOY HUFF obtained possession of a controlled substance, 30
27

1 1-miligram tablets of Lorazepam, a Schedule IVA controlled substance, by
2 misrepresentation, fraud, forgery, deception, or subterfuge.

3 All of which is a Felony class C offense being contrary to and in violation of
4 11.71.040(a)(9) and against the peace and dignity of the State of Alaska.

5 The undersigned swears under oath this Information is based upon a review of
6 police report 069608 submitted to date.

7 The defendant, Jessica Joy Huff, was employed by PCA agency Consumer
8 Direct Care Network-Kenai (“Consumer Direct”) as a personal care assistant (“PCA”) in
9 the first quarter of 2018. In February 2018, Huff was assigned client C.K., who was
10 receiving Medicaid PCA services through Consumer Direct. C.K.’s PCA would assist
11 with activities of daily living such as transferring, dressing, hygiene, laundry, locomotion,
12 meal prep, housework, and shopping. To receive payment for her PCA services, Huff
13 submitted to Consumer Direct PCS (“Personal Care Services”) timesheets, which
14 included notes about condition of the recipients, activities that were performed, and the
15 hours worked.

16 On March 10, 2018, she signed and dated a PCS Timesheet showing that she
17 provided services for C.K. on March 5, March 6, March 7, March 8, and March 9.
18 Specifically, on her signed timesheet, Huff claimed to work with C.K. on March 9, 2018
19 from 12:00 p.m. to 5:30 p.m. Based on the timesheet, Consumer Direct submitted a
20 claim to the Alaska Medicaid program for those hours.

21 On November 1, 2018, the Medicaid Fraud Control Unit (“MFCU”) received a
22 referral from DHSS alleging that PCA Jessica Huff picked up a C.K.’s medication –
23 Lorazepam, a Schedule IVA controlled substance – on March 9, 2018, but didn’t take it
24 to C.K. Instead, according to C.K., the PCA drove to Homer for the next several days.
25 The PCA told employees at Consumer Direct that on the day she picked up the
26 medication in Soldotna she wasn’t able to make contact with the recipient so just kept the
27 medication and drove to Homer. While in Homer, she said, the medication was stolen
from her unlocked vehicle.

1 MFCU Investigator Lance Anderson interviewed C.K. on February 14, 2019.
2 C.K. stated that on March 9, 2108, her PCA, Jessica Huff, drove her to her doctor
3 because an acquaintance had just died and she was feeling very anxious. C.K. said her
4 doctor, Dr. Schurig, in Kenai, prescribed an anti-anxiety medication, Lorazepam, and
5 they drove to the Soldotna Professional Pharmacy to have it filled. The pharmacy told
6 them they were really busy and it would take a while to fill the order so it would be better
7 to come back. C.K. said the doctor also told her it would be best if she stayed with a
8 friend for a few days until she felt better. C.K. said she had Jessica drive her to C.K.'s
9 friend's residence approximately 6 miles out of Soldotna on the Sterling Hwy toward
10 Homer. C.K. said Jessica told her she would return to Soldotna and pick up the
11 medication then bring it to her. C.K. said she waited for Jessica at the friend's house and
12 even spent the night but Jessica never arrived or called. C.K. said she had three
13 conversations and/or texts over the next few days inquiring about the medication. At first
14 Jessica told her she would drop off the medication but didn't. Then Jessica said she had
15 gone to Homer and would get it to her but on the third exchange Jessica told C.K. the
16 medication had been stolen out of her roommate's truck that was unlocked in Homer.
17 C.K. said she had one more conversation with Jessica when a few days later she got a call
18 from Jessica asking if C.K. would contact Consumer Direct and tell them that she had
19 delivered the medication. C.K. told her she would not. C.K. said she called Consumer
20 Direct and reported the incident. C.K. also reported the incident to Kenai Police (18-
21 030387), but since the matter occurred in Soldotna, Kenai PD did not conduct any
22 investigation and it is unclear at this point whether anyone at Kenai PD forwarded the
23 information to Soldotna Police.

24 Investigator Anderson obtained the records from Soldotna Professional
25 Pharmacy, which showed that C.K.'s medication was picked up at 4:52 p.m. on March 9,
26 2018, the day that Huff put on her timesheet as working with C.K. until 5:30 p.m. To get
27 from Homer from Soldotna, Huff would have had to travel on the Sterling Highway right
past the house where C.K. was staying with a friend, where Huff had just dropped her off
earlier in the day.

1 Investigator Anderson interviewed C.K.'s friend, Jay Veinup, who confirmed
2 what C.K. described and said there is no reason Jessica could not have dropped off the
3 medication at his home which is on the way to Homer.

4 Investigator Anderson interviewed Huff, who stated that she had given C.K. a
5 ride to her doctor and pharmacy on Friday, March 9, 2018 and that she gave C.K. a ride
6 to Jay's residence on the Sterling highway. She also confirmed that she went back to the
7 pharmacy and picked up the medication, but did not drop off the medication because
8 C.K. told her that she was going to go to Anchorage for three days for an appointment
9 and would not be available. Huff stated that she tried to call C.K. but received no answer
10 for three hours. Huff stated that she offered to drop off the medication, but C.K. told her
11 no. She confirmed that she did not travel to Homer on March 9, 2018. She confirmed
12 that she did not file a police report about the stolen Lorazepam.

13 BAIL INFORMATION

14 Per the Alaska Public Safety Information Network, the defendant has the
15 following convictions in Alaska:

CONV COURT	CONV DATE	CONVICITING CHARGE	COURT DOCKET	POS ID	FEL	ATN
DKN	10/26/15	VIOLATE CONDITION OF RELEASE FOR M	3KN-15-374		Y	N 115200081
DSW	11/05/13	HARASSMENT 2-OFFENSIVE PHYS CONTAC	3SW-12-270		Y	N 113732037
DAN	11/21/07	RECKLESS ENDANGERMENT	3AN-07-10555		Y	N 110636757

19 Dated at Anchorage, Alaska, this ____ day of March, 2019.

21 KEVIN G. CLARKSON
22 ATTORNEY GENERAL

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