

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF FULTON



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 39-04-02  
MDJ: Hon. WENDY RICHARDS MELLOTT  
Address: 208 NORTH SECOND STREET  
MCCONNELLSBURG, PA 17233

DEFENDANT: (NAME and ADDRESS):  
LORI ANN KETCHAM  
First Name Middle Last Name Gen.  
3 SOUTH HIGH STREET, NEWBURG, PA 17240

Telephone: (717)485-4842

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Limited
- 3-Felony Surrounding States
- 4-Felony No Extradition
- 5-Felony Pending Extradition
- 6-Felony Pending Extradition Determ.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending Extradition
- F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <b>CR-60-18</b>	Date Filed <b>6/22/2018</b>	OTN/LiveScan Number <b>U598839-3</b>	Complaint/Incident Number <b>MF143-037</b>	SID <b>421-32-65-9</b>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB <b>6/29/1981</b>	Place of Birth <b>York, Pa</b>	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name <b>AKA</b>		Middle Name	Last Name	Gen.	
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> ONG (Orange)	<input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)	<input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)	
Driver License	State <b>PA</b>	License Number <b>31 018 160</b>	Expires <b>6/30/2019</b>	Weight <b>185 lbs.</b>	
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO	FBI Number <b>800159AH7</b>	Height <b>5 Ft. 5 in.</b>		
Fingerprint Classification	MNU Number				
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location	Defendant a Veteran?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

DEFENDANT VEHICLE INFORMATION

Plate Number	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Commercial Veh. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

CHRISTOPHER JASON, DAG  
(Name of the attorney for the Commonwealth)

*Christopher Jason DAG*  
(Signature of the attorney for the Commonwealth)

6/22/2018  
(Date)

I, <b>TUCKER J. BEECHER, SPECIAL AGENT</b> (Name of the Affiant)	<b>BADGE #505</b> (PSP/PMPOETC - Assigned Affiant ID Number & Badge #)
of <b>Pennsylvania Office of Attorney General</b> (Identify Department or Agency Represented and Political Subdivision)	<b>PA0222400</b> (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [401] _____ West, Mcconnellsburg, PA 17233 (Subdivision Code) (Place-Political Subdivision)	
in <b>FULTON</b> County	<b>[29]</b> on or about <b>MAY 18, 2016 THROUGH FEBRUARY 28, 2018</b> (County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-60-18</b>	Date Filed: <b>6/22/18</b>	OTN/LiveScan Number <b>4598839-3</b>	Complaint/Incident Number <b>MF143-037</b>
Defendant Name:	First: <b>LORI</b>	Middle: <b>ANN</b>	Last: <b>KETCHAM</b>

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>0</b>				
<input checked="" type="checkbox"/> Lead?	<b>1</b> Offense#	<b>1407</b> Section	<b>(A)(1)</b> Subsection	<b>of the</b> <b>TITLE 62</b> PA Statute (Title)	<b>1</b> Counts	<b>F-3</b> Grade	<b>2699</b> NCIC Offense Code	<b>110</b> UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): <b>MEDICAID FRAUD - SUBMISSION OF FALSE INFORMATION</b>					
Acts of the accused associated with this Offense: From May 18, 2016 through February 28, 2018, in a continuous course of conduct, as a principal, accomplice, or co-conspirator, the Defendant, Lori Ann Ketcham, did knowingly or intentionally present for allowance or payment false or fraudulent claims for furnishing services under Medicaid and/or knowingly submitted false information for the purpose of obtaining greater compensation than she was entitled to receive. Specifically, the Defendant, knowingly submitted false information on contact notes to Peerstar, LLC (Peerstar) to obtain greater compensation than she was entitled to receive in violation of 62 P.S. §1407(a)(1).								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>0</b>				
<input type="checkbox"/> Lead?	<b>2</b> Offense#	<b>1407</b> Section	<b>(A)(7)</b> Subsection	<b>of the</b> <b>TITLE 62</b> PA Statute (Title)	<b>1</b> Counts	<b>F-3</b> Grade	<b>2699</b> NCIC Offense Code	<b>110</b> UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): <b>MEDICAID FRAUD - MISREPRESENTATION</b>					
Acts of the accused associated with this Offense: From May 18, 2016 through February 28, 2018, in a continuous course of conduct, as a principal, accomplice, or co-conspirator, the Defendant, Lori Ann Ketcham, knowingly or intentionally caused the submission of fraudulent claims by Peerstar which misrepresented the description of services or the dates of services to Medicaid recipients. Specifically, the Defendant, intentionally submitted false contact notes to Peerstar, which contained false dates and times, which in turn caused Peerstar to submit fraudulent Medicaid claims to PerformCare, in violation of 62 P.S. §1407(a)(7).								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>0</b>				
<input type="checkbox"/> Lead?	<b>3</b> Offense#	<b>3922</b> Section	<b>(A)(1)</b> Subsection	<b>of the</b> <b>TITLE 18</b> PA Statute (Title)	<b>1</b> Counts	<b>F-3</b> Grade	<b>2399</b> NCIC Offense Code	<b>110</b> UCR/NIBRS Code
<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): <b>THEFT BY DECEPTION</b>					
Acts of the accused associated with this Offense: From May 18, 2016 through February 28, 2018, in a continuous course of conduct, as a principal, accomplice, or co-conspirator, the Defendant, Lori Ann Ketcham, did intentionally obtain property of another by deception by creating a false impression, including false impressions as to law, value, intention or other state of mind. Specifically, the Defendant provided false contact notes to Peerstar, representing that she had provided a greater number of hours of service than she actually provided, and in doing so, caused the theft of over \$2,000.00 from Medicaid and/or Peerstar/PerformCare, in violation of 18 Pa.C.S. §3922(a)(1).								



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Defendant Name:	First: <i>LORI</i>	Middle: <i>ANN</i>	Last: <i>KETCHAM</i>

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <i>0</i>
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<input type="checkbox"/>	<i>4</i>	<i>4911</i>	<i>(A)(2)</i>	of the	<i>TITLE 18</i>	<i>1</i>	<i>F-3</i>	<i>2589</i>	<i>110</i>
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

Acts of the accused associated with this Offense: From May 18, 2016 through February 28, 2018, in a continuous course of conduct, as a principal, accomplice, or co-conspirator, the Defendant, Lori Ann Ketcham, did knowingly make, present, or use any record, document or thing knowing it to be false, and with intent that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government. Specifically, the Defendant submitted falsified contact notes to Medicaid provider, Peerstar, which caused fraudulent claims to be submitted to Medicaid, a government administered program, in violation of 18 Pa.C.S. §4911(a)(2).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <i>0</i>
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<input type="checkbox"/>	<i>5</i>	<i>4101</i>	<i>(A)(2)</i>	of the	<i>TITLE 18</i>	<i>1</i>	<i>M-1</i>	<i>2589</i>	<i>250</i>
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: From May 18, 2016 through February 28, 2018, in a continuous course of conduct, as a principal, accomplice, or co-conspirator, the Defendant, Lori Ann Ketcham, did intentionally make, complete, execute, authenticate, issue or transfer legal names of individuals so that it purported to be the act of another, who did not authorize that act. Specifically, the Defendant, recorded false signatures of a client without the client's consent, on contact notes submitted to Peerstar, representing that the client had signed off and verified that the Defendant provided services she claimed to have provided. In doing so, the Defendant caused Peerstar/PerformCare to process fraudulent claims of service based on the completion of fraudulent encounter forms, in violation of 18 Pa.C.S. §4101(a)(2).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:





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Defendant Name:	First: LORI	Middle: ANN	Last: KETCHAM

**AFFIDAVIT of PROBABLE CAUSE**

1. Your Affiant is Tucker Beecher, presently employed as a Special Agent with the Pennsylvania Office of Attorney General (OAG), Bureau of Criminal Investigations (BCI), Medicaid Fraud Control Section (MFCS). Your Affiant is assigned to the OAG Central Regional Office located in Lemoyne, PA 17043. Your Affiant is a law enforcement officer and as such, your Affiant is authorized to apply for, obtain and serve search warrants, make seizures and effectuate arrests. This Affidavit is based upon personal knowledge and/or information provided to your Affiant through the course of the investigation.

2. The Defendant is Lori Ann Ketcham (the Defendant). The Defendant resides at 3 South High Street, Newburg, PA 17240. The Defendant was employed as a Certified Peer Specialist (CPS) from May 5, 2016 through September 28, 2016 at Peerstar, LLC. (Peerstar) a community behavioral healthcare service agency located at 214 College Park Plaza, Johnstown, PA 15904. As a CPS, the Defendant was responsible for providing individual advocacy and support to her peers to facilitate the development of recovery skills and enhance wellness. In the time the Defendant was working at Peerstar, she had a total of four clients that all lived in Franklin and Cumberland Counties.

3. According to the Pennsylvania Department of Human Services (DHS) records, Peerstar is enrolled as a Medicaid Provider. The Defendant submitted her billing documentation to the Peerstar office located at 200 Lincoln Way West, McConnellsburg, PA 17233 (Fulton County). Peerstar provides guidance, support and hope to individuals recovering from mental illnesses and/or co-occurring substance abuse disorders. DHS pays a per capita amount for every Medicaid recipient each month to behavioral health managed care organization PerformCare, 8040 Carlson Road, Harrisburg, PA 17112. PerformCare disburses Medicaid funds to Peerstar upon receipt of encounter claims from service hours reported by Peerstar employees.

4. According to Pennsylvania Medicaid bulletin # OMHSAS-16-12, "Based upon the fundamental principles of recovery, Peer Support Services (PSS) are specialized supportive interventions conducted by Certified Peer Specialists (CPS). A CPS is a self-identified individual who currently or previously received behavioral health services who is trained and certified to offer support and assistance in helping others in their recovery and community-integration process. PSS is intended to inspire hope in individuals that recovery is not only possible, but probable. The service is designed to promote empowerment, self-determination, understanding, coping skills, and resiliency through mentoring and service coordination supports that allow individuals with serious mental illness or serious emotional disturbance and co-occurring disorders to achieve personal wellness and cope with the stressors and barriers encountered when recovering from their disabilities."

5. On December 12, 2016, the OAG, MFCS, received a referral from Erin O'Conner-Pritchard (O'Conner-Pritchard), Manager of the Special Investigations Unit for PerformCare, regarding alleged fraudulent billing documentation submitted by the Defendant causing her to be paid more money than she was entitled to receive. O'Conner-Pritchard reported that an investigation was completed by Peerstar into the Defendant's claims of service and Peerstar alleged that all of the Defendant's four clients identified discrepancies from what the Defendant reported to Peerstar. Peerstar found instances where the Defendant billed for dates and times when clients said they never saw the Defendant, inflated the amount of time she billed for services, documented inaccurate information on billing documents and submitted photocopied time sheets.

6. Special Agent Mike Carlson (SA Carlson) contacted Peerstar Program Director, Lori Miller (Miller) and obtained employment records for the Defendant from Peerstar. Included was the Defendant's personnel record, Peerstar CPS Manual, Medicaid CPS Program Regulations, Peerstar Code of Conduct, training records, disciplinary records, payroll records, time sheets and contact notes for the Defendant's caseload. Contact notes are used to



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document the dates, times and locations of services provided to each client. The contact notes are to be verified at the time of service and signed by the client. The Defendant was compensated based on the information contained on the contact notes she submitted to Peerstar.

Your Affiant reviewed the training documentation from Peerstar which showed that on May 5, 2016, the Defendant signed an acknowledgement stating she reviewed and understands all aspects of the CPS position description. On the same date, the Defendant also signed a form indicating she was in receipt of the Company Employee Handbook and that she understands all policies contained therein, including: correct documentation and billing procedures, no simultaneous billing for two providers at the same time, contact note requirements and how to report Medicaid fraud. The Defendant signed a Peerstar 'Code of Conduct Acknowledgement' certifying she received the Peerstar code of conduct, that she has read the code of conduct and understands that the code of conduct outlines her responsibilities to Peerstar.

7. Your Affiant confirmed payment by PerformCare, using Medicaid funds, to Peerstar for claims submitted as a result of contact notes submitted by the Defendant. The claims submitted by Peerstar were based on the amount of units the Defendant recorded on her contact notes. The services the Defendant billed for were billed to Medicaid at the rate of \$14.00 per unit of service, for providing CPS services to her clients. A unit is measured as 15 minutes of service.

8. Your Affiant queried an employment history search from the PA Department of Labor & Industry using the PA Justice Network (JNET) for the Defendant. Your Affiant located reported wages from Honor Health Network, d.b.a. Angels on Call, LTD. (Angels on Call) and wages from New Visions, Inc. (New Visions) for the Defendant.

9. Your Affiant obtained employment records from Angels on Call, for the Defendant. Included was the Defendant's job description, shift records and work calendars for her position. The Defendant was employed as a Caregiver who worked with clients in their homes by providing them attendant care services. The Defendant's clients resided in Cumberland and Franklin Counties. The Defendant was required to record her shifts using a web based program that geo-located her position when she recorded her shifts. The Defendant was required to record her shift using her client's phone or if she used her phone she had to be in close proximity of the client's residence. Angels on Call is also a Pennsylvania Medicaid Provider.

10. Your Affiant obtained employment records from New Visions, Inc. (New Visions), for the Defendant. Included was the Defendant's job description and time sheets for her position. The Defendant was employed as a Structured Community Residence Residential Support Staff who worked with clients in a group home setting in Cumberland County. The Defendant provided her clients with attendant care services in the group home. The Defendant was required to complete paper time sheets for her shifts. New Visions is also a Pennsylvania Medicaid Provider.

The Peerstar clients interviewed will be identified using their initials only throughout this affidavit.

11. Your Affiant and Special Agent Ryan King interviewed M.B. and D.H., two of the Defendant's clients from her position with Peerstar. Both clients interviewed identified multiple dates of service that were inflated in duration or were not accurate to what services were billed as though provided by the Defendant. Both clients also reported that the Defendant had them sign incomplete or blank contact notes at their appointments. D.H.

**POLICE CRIMINAL COMPLAINT**

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also identified contact notes that had her signature affixed that were photocopied. Altogether the clients identified 88 hours of service that were overbilled.

12. Your Affiant compared the contact notes submitted by the Defendant for her CPS position with Peerstar with the information and documentation obtained during the course of your Affiant's investigation including the interviews with the Peerstar clients, shift records from Angels on Call and shift records from New Visions.

The following table illustrates specific examples of fraud, as identified by your Affiant. The information listed in the table is the date of service, start time, end time, client name and service location the Defendant recorded on her documentation that shows the overlapping shifts between her positions.

Date of Service	Start time	End time	Client Name	Service Location	Agency
Friday, July 22, 2016	11:30:00 AM	1:30:00 PM	P.H.	Shippensburg	AOC
Friday, July 22, 2016	1:00:00 PM	3:30:00 PM	D.H.	Chambersburg	Peerstar
Friday, July 22, 2016	1:57:46 PM	6:53:02 PM	R.H.	Shippensburg	AOC
Friday, July 22, 2016	4:00:00 PM	7:00:00 PM	B.B.	Chambersburg	Peerstar

Monday, August 1, 2016	12:30:00 PM	4:30:00 PM	D.H.	Chambersburg	Peerstar
Monday, August 1, 2016	1:56:00 PM	7:00:00 PM	R.H.	Shippensburg	AOC

Tuesday, September 6, 2016	7:00:00 AM	11:00:00 AM	M.B.	Chambersburg	Peerstar
Tuesday, September 6, 2016	8:00:00 AM	10:00:00 AM	R.K.	Shippensburg	AOC
Tuesday, September 6, 2016	8:55:29 AM	11:23:17 AM	D.L.	Lemoyne	AOC
Tuesday, September 6, 2016	11:30:00 AM	3:30:00 PM	D.H.	Chambersburg	Peerstar

Friday, February 17, 2017	4:00:00 PM	9:00:00 PM	K.L.	Carlisle	AOC
Friday, February 17, 2017	7:00:00 PM	11:59:00 PM	SCR Newville	Newville	New Vision

Friday, November 24, 2017	6:00:00 AM	10:00:00 AM	N.K.	Newburg	AOC
Friday, November 24, 2017	11:00:00 AM	1:00:00 PM	R.K.	Shippensburg	AOC
Friday, November 24, 2017	2:00:00 PM	6:00:00 PM	N.K.	Newburg	AOC
Friday, November 24, 2017	3:00:00 PM	11:59:00 PM	SCR Newville	Newville	New Vision

13. Your Affiant identified an on-going pattern of conduct from May 18, 2016 through February 28, 2018, where the Defendant inflated the lengths of the shifts she reported, misrepresented the times she was with her clients and billed for services when she was not with her clients. Your Affiant identified at least 192 hours of service the Defendant billed for, but could not have provided.

14. On June 15, 2018, Special Agent Ryan King (SA King) and your Affiant interviewed the Defendant. The Defendant stated her responsibilities as a CPS were to assist clients with day to day activities at the client's home and in the community. The Defendant confirmed she was trained and certified as a peer specialist. The



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Defendant confirmed she was provided the Peerstar code of conduct, read the code of conduct and understood the code of conduct by executing her signature on an acknowledgement. The Defendant confirmed she also executed her signature on an acknowledgement certifying that she understands all aspects of the position description for the Peerstar CPS position. The Defendant confirmed that she was familiar with the billing section of the Peerstar employee manual with defined billing procedures. The Defendant confirmed she understood her Peerstar contact notes were used to calculate her pay for billing purposes.

The Defendant admitted that the times and duration of appointments on her Peerstar contact notes were misrepresented and not always accurate. The Defendant admitted that the times of her Angels on Call shifts were misrepresented and not always accurate. The Defendant admitted that she presented incomplete Peerstar contact notes to clients to sign and that she photocopied contact notes with her client's signatures already affixed. The Defendant admitted that she knew submitting fraudulent documentation was wrong. The Defendant confirmed she was paid more money than that to which she was legally entitled.

15. The evidence obtained through your Affiant's investigation and interview with the Defendant indicates that the Defendant engaged in a continuing and persistent pattern of fraud from May 18, 2016 through February 28, 2018, by inflating her hours of service and misrepresenting the hours of services she did provide. By submitting false documentation to Peerstar, Angels on Call and New Visions, the Defendant was paid more than she was entitled to receive. Your Affiant identified at least 280 fraudulent hours of service billed by the Defendant between her three positions.

Relying on the fraudulent documentation submitted by the Defendant, Peerstar, Angels on Call and New Visions submitted claims to PerformCare, and Medicaid, and were collectively reimbursed in an amount in excess of \$2,000.00, for services which had not been provided or were misrepresented. Further, the Defendant did knowingly present contact notes with forged signatures of an individual who did not authorize the act, knowing them to be false and with the intent to be taken genuine, belonging, received or kept by Medicaid for information or record.

16. Your Affiant believes the facts contained in this affidavit are sufficient and probable cause to warrant the arrest of the Defendant for the following crimes: Medicaid Fraud, 62 P.S. §1407(a)(1), (a)(7), Theft by Deception, 18 Pa.C.S. §3922(a)(1), Tampering with public records or information, 18 Pa.C.S. §4911(a)(2) and Forgery, 18 Pa.C.S. §4101(a)(2).

17. The above statements and information are true and correct to the best of my information, knowledge, and belief, and any false statements made therein are made subject to the penalties of Section 4904 of the Crimes Code, 18 Pa.C.S. §4904 relating to Unsworn Falsification to Authorities.

**I, TUCKER J. BEECHER, SPECIAL AGENT, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.**

  
\_\_\_\_\_  
(Signature of Affiant)

Sworn to me and subscribed before me this 22nd day of June 2018



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Defendant Name:	First: LORI	Middle: ANN	Last: KETCHAM

Date

*06/22/2018*

, Magisterial District Judge

My commission expires first Monday of January, *2022*



SEAL