

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: BRADFORDMagisterial District Number: 42-3-02
MDJ: Hon. LARRY J. HURLEY
Address: 75 HERRICK AVENUE
SAYRE, PA 18840

Telephone: (570)888-6324

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENN SYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

STEPHANIE

GWEN

KING

First Name

Middle Name

Last Name

6860 SHESHEQUIN ROAD, ULSTER, PA 18850

Ge
n

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number

Date Filed

OTN/LiveScan Number

Complaint/Incident Number

Request Lab
Services?☐ YES ☐ NO

GENDER

DOB 07/07/1976

POB

Add'l DOB / /

Co-Defendant(s) ☐☐ Male☒ Female

First Name

Middle Name

Last Name

Gen.

AKA STEPHANIE

GWEN

BIDWELL

F

RACE

☒ White☐ Asian☐ Black☐ Native American☐ Unknown

ETHNICITY

☐ Hispanic☐ Non-Hispanic☐ UnknownHair
Color☐ GRY (Gray)☐ RED (Red/Aubn.)☐ SDY (Sandy)☐ BLU (Blue)☐ PLE (Purple)☒ BRO (Brown)☐ BLK (Black)☐ ONG (Orange)☐ WHI (White)☐ XXX (Unk./Bald)☐ GRN (Green)☐ PNK (Pink)☐ BLN (Blonde / Strawberry)Eye
Color☐ BLK (Black)☒ BLU (Blue)☐ BRO (Brown)☐ GRN (Green)☐ GRY (Gray)☐ HAZ (Hazel)☐ MAR (Maroon)☐ PNK (Pink)☐ MUL (Multicolored)☐ XXX (Unknown)

DNA

☐ YES☐ NO

DNA Location

WEIGHT (lbs.)

FBI Number

MNU Number

Defendant Fingerprinted

☐ YES☐ NO

Ft. HEIGHT In.

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

Plate #

State

Haz
mat
☐

Registration

Sticker (MM/YY) /

Comm'l Veh.

Ind. ☐

School Veh.

☐

Oth. NCIC Veh. Code

Reg.
same
as Def.
☐

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).

SDAG MARK BELLAVIA / DAG CHRIS SHERWOOD

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

02/24/2022

(Date)

I, SA MATTHEW G. YOCUM / SA DAVID BUNCHALK

(Name of the Affiant)

BADGE #816 / BADGE #553

(PSP/MPOTEC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ 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 [402] Athens Boro

(Subdivision Code)

(Place-Political Subdivision)

in BRADFORD County

[08]

(County Code)

on or about November 1, 2016 through March 25, 2020



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number MF1200036314
Defendant Name:	First: STEPHANIE	Middle: GWEN	Last: KING

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.)

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 checked="" type="checkbox"/>	1	1407	(A)(1)	of the	TITLE 62	2	F3	2699	110
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	

Statute Description (include the name of statute or ordinance): **MEDICAID FRAUD - SUBMISSION OF FALSE INFORMATION**

Acts of the accused associated with this Offense: On or about May 7, 2019 and July 3, 2019, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly or intentionally present for allowance or payment, false or fraudulent claims for furnishing services under the Medical Assistance Program and/or knowingly submitted false information, for the purpose of obtaining greater compensation than that to which she was legally entitled and/or knowingly submitted false information for the purpose of obtaining authorization for furnishing services or merchandise under medical assistance. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

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"/>	2	4101	(A)(1)	of the	TITLE 18	2	F3	2399	110
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	

Statute Description (include the name of statute or ordinance): **FORGERY - ALTERS ANY WRITING OF ANOTHER WITHOUT AUTHORITY**

Acts of the accused associated with this Offense: On or about May 7, 2019 and July 3, 2019, as a principal or accomplice, the Defendant, Stephanie G. King, with the intent to defraud or injure anyone, or with the knowledge that she is facilitating a fraud or injury, alters any writing of another without their authority. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

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"/>	3	4101	(A)(2)	of the	TITLE 18	2	F3	2399	110
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	

Statute Description (include the name of statute or ordinance): **FORGERY - MAKES, COMPLETES, EXECUTES, AUTHENTICATES, ISSUES OR TRANSFERS ANY WRITING**

Acts of the accused associated with this Offense: On or about May 7, 2019 and July 3, 2019, as a principal or accomplice, the Defendant, Stephanie G. King, with the intent to defraud or injure anyone, or with the knowledge that she is facilitating a fraud or injury, made, completed, executed, authenticated, issued or transferred any writing so that it purports to be the act of another who did not authorize that act. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number MFI200036314
Defendant Name:	First: STEPHANIE	Middle: GWEN	Last: KING

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 _____					
<input type="checkbox"/> Lead?	4	4101	(A)(3)	of the	TITLE 18	2	F3	2399	110
PennDOT Data (if applicable)		Accident Number	PA Statute (Title)		Counts	Grade	NCIC Offense Code	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): FORGERY - UTTERS ANY WRITING									
Acts of the accused associated with this Offense: On or about May 7, 2019 and July 3, 2019, as a principal or accomplice, the Defendant, Stephanie G. King, with the intent to defraud or injure anyone, or with the knowledge that she is facilitating a fraud or injury, uttered any writing which she knew to be forged. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									

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 _____					
<input type="checkbox"/> Lead?	5	4911	(A)(1)	of the	TITLE 18	1	F3		
PennDOT Data (if applicable)		Accident Number	PA Statute (Title)		Counts	Grade	NCIC Offense Code	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): TAMPERING WITH PUBLIC RECORDS									
Acts of the accused associated with this Offense: From May 7, 2019 through March 25, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly make a false entry in, or false alteration of, any record, document or thing 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. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									

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 _____					
<input type="checkbox"/> Lead?	6	4911	(A)(2)	of the	TITLE 18	1	F3		
PennDOT Data (if applicable)		Accident Number	PA Statute (Title)		Counts	Grade	NCIC Offense Code	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): TAMPERING WITH PUBLIC RECORDS									
Acts of the accused associated with this Offense: From May 7, 2019 through March 25, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did 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. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: STEPHANIE	Middle: GWEN	Last: KING

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 _____					
<input type="checkbox"/> Lead?	7	1407	(A)(6)	of the	TITLE 62	1	F3	2699	110
PennDOT Data (if applicable)	Accident Number	PA Statute (Title)		Counts	Grade	NCIC Offense Code	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): MEDICAID FRAUD - BELOW ACCEPTED MEDICAL TREATMENT STANDARDS									
Acts of the accused associated with this Offense: From November 10, 2017 through November 9, 2019, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly or intentionally submit a claim for services, supplies or equipment which are not documented in the record in the prescribed manner and are of little or no benefit to the recipient, are below the accepted medical treatment standards, or are unneeded by the recipient. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									

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 _____					
<input type="checkbox"/> Lead?	8	780-113	(A)(12)	of the	TITLE 35	1	F	5503	
PennDOT Data (if applicable)	Accident Number	PA Statute (Title)		Counts	Grade	NCIC Offense Code	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): CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT - OBTAINING POSSESSION OF A CONTROLLED SUBSTANCE BY FRAUD									
Acts of the accused associated with this Offense: From November 10, 2017 through November 9, 2019, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, acquired or obtained possession of a controlled substance by misrepresentation, fraud, forgery, deception or subterfuge. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									

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 _____					
<input type="checkbox"/> Lead?	9	780-113	(A)(14)	of the	TITLE 35	1	F	5503	1840
PennDOT Data (if applicable)	Accident Number	PA Statute (Title)		Counts	Grade	NCIC Offense Code	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): CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT - PRESCRIBING OUTSIDE THE GOOD FAITH PRACTICE OF MEDICINE									
Acts of the accused associated with this Offense: From November 10, 2017 through November 9, 2019, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, prescribed controlled substances that were not done in good faith in the course of professional practice, within the scope of the patient relationship, or in accordance with treatment principles accepted by a responsible segment of the medical profession. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number MFI200036314
Defendant Name:	First: STEPHANIE	Middle: GWEN	Last: KING

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 _____					
<input type="checkbox"/>	10	1407	(A)(1)	of the	TITLE 62	1	F3	2699	110
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	
Statute Description (include the name of statute or ordinance): MEDICAID FRAUD - SUBMISSION OF FALSE INFORMATION									
Acts of the accused associated with this Offense: From November 1, 2017 through February 10, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly or intentionally present for allowance or payment, false or fraudulent claims for furnishing services under the Medical Assistance Program and/or knowingly submitted false information, for the purpose of obtaining greater compensation than that to which she was legally entitled and/or knowingly submitted false information for the purpose of obtaining authorization for furnishing services or merchandise under medical assistance. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									

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 _____					
<input type="checkbox"/>	11	1407	(A)(6)	of the	TITLE 62	1	F3	2699	110
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	
Statute Description (include the name of statute or ordinance): MEDICAID FRAUD - BELOW ACCEPTED MEDICAL TREATMENT STANDARDS									
Acts of the accused associated with this Offense: From November 1, 2017 through February 10, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly or intentionally submit a claim for services, supplies or equipment which are not documented in the record in the prescribed manner and are of little or no benefit to the recipient, are below the accepted medical treatment standards, or are unneeded by the recipient. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									

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 _____					
<input type="checkbox"/>	12	3922	(A)(1)	of the	TITLE 18	1	F2	2399	060
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	
Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION									
Acts of the accused associated with this Offense: From November 1, 2017 through February 10, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, intentionally created or reinforced a false impression, including false impressions as to law, value, intention or other state of mind by submitting fraudulent claims to the Medicaid Program causing theft of over \$100,000.00. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number MFI200036314
Defendant Name:	First: STEPHANIE	Middle: GWEN	Last: KING

<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 _____
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<input type="checkbox"/> Lead?	13	4117	(A)(2)	of the	TITLE 18	1	F3	2699	26A
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input checked="" type="checkbox"/> 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): **INSURANCE FRAUD - FALSE CLAIM**

Acts of the accused associated with this Offense: From November 7, 2016 through June 6, 2017, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly and with the intent to defraud any insurer, present to insurance companies, Highmark, statements forming a part of, or in support of, claims that contained false, incomplete or misleading information concerning any fact or thing material to the claims. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

<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 _____
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<input type="checkbox"/> Lead?	14	3922	(A)(1)	of the	TITLE 18	1	F3	2399	060
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input checked="" type="checkbox"/> 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): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: From November 7, 2016 through June 6, 2017, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, intentionally created or reinforced a false impression, including false impressions as to law, value, intention or other state of mind by submitting fraudulent claims to Highmark causing theft of over \$2,000.00. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

<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 _____
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<input type="checkbox"/> Lead?	15	4117	(A)(2)	of the	TITLE 18	1	F3	2699	26A
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input checked="" type="checkbox"/> 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): **INSURANCE FRAUD - FALSE CLAIM**

Acts of the accused associated with this Offense: From November 1, 2017 through March 24, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly and with the intent to defraud any insurer, present to insurance companies, Highmark, statements forming a part of, or in support of, claims that contained false, incomplete or misleading information concerning any fact or thing material to the claims. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number MF1200036314
Defendant Name:	First: STEPHANIE	Middle: GWEN	Last: KING

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"/> Lead?	16	3922	(A)(1)	of the	TITLE 18	1	F2	2399	060
	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): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: From November 1, 2017 through March 24, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, intentionally created or reinforced a false impression, including false impressions as to law, value, intention or other state of mind by submitting fraudulent claims to Highmark causing theft of over \$100,000.00. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

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"/> Lead?	17	780-113	(A)(14)	of the	TITLE 35	1	F	5503	1840
	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): **CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT - PRESCRIBING OUTSIDE THE GOOD FAITH PRACTICE OF MEDICINE**

Acts of the accused associated with this Offense: From November 1, 2017 through March 24, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, prescribed controlled substances that were not done in good faith in the course of professional practice, within the scope of the patient relationship, or in accordance with treatment principles accepted by a responsible segment of the medical profession. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

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"/> Lead?	18	1407	(A)(6)	of the	TITLE 62	1	F3	2699	110
	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): **MEDICAID FRAUD - BELOW ACCEPTED MEDICAL TREATMENT STANDARDS**

Acts of the accused associated with this Offense: From November 1, 2017 through March 24, 2020, in a continuous course of conduct, as a principal or accomplice, the Defendant, Stephanie G. King, did knowingly or intentionally submit a claim for services, supplies or equipment which are not documented in the record in the prescribed manner and are of little or no benefit to the recipient, are below the accepted medical treatment standards, or are unneeded by the recipient. See Affidavit of Probable Cause attached hereto and incorporated herein by reference.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number MFI200036314
Defendant Name:	First: STEPHANIE	Middle: GWEN	Last: KING

AFFIDAVIT of PROBABLE CAUSE

1. Your Affiant is Special Agent David Bunchalk (SA Bunchalk), Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, Insurance Fraud Section (IFS). Your Affiant is assigned to the OAG Central Regional Office located at 680 Baltimore Drive, Wilkes-Barre, PA. 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 and obtained by your Affiant through the course of the investigation.
2. Your Affiant is Special Agent Matthew G. Yocum (SA Yocum), 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 at Strawberry Square, Harrisburg, PA. 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 and obtained by your Affiant through the course of the investigation.
3. The Defendant is Stephanie G. King, a Certified Registered Nurse Practitioner (CRNP). The Defendant owned and operated The Center for Holistic and Integrative Mental Health, LLC (CHIMH), which was an outpatient mental health facility located at 307 North Main Street, Athens, Pennsylvania 18810. According to the Pennsylvania Department of State (DOS), the Defendant holds a Certified Registered Nurse Practitioner license practicing under License number SP011532 and holds a Registered Nurse license practicing under License number RN554209. In order to provide the expanded treatment functions of a CRNP, which includes the ability to prescribe medication, the Defendant is required to collaborate with a Pennsylvania licensed physician and document her collaboration through a collaborative agreement and prescriptive authority collaborative agreement. The Defendant's licenses and prescriptive authority collaborative agreements were last renewed on September 24, 2019 and expired on October 31, 2021. The Defendant is also registered with the DEA to prescribe controlled substances under registration number MK2465739. The Defendant's licenses are currently under suspension effective March 25, 2020 by the DOS. CHIMH closed effective March 2020 and is no longer an operational facility.
4. The Pennsylvania Office of Attorney General (PA OAG), Medicaid Fraud Control Section (MFCS) and Insurance Fraud Section (IFS) received information from the Pennsylvania Office of State Inspector General (OSIG) via an anonymous tip and a referral from the Bradford County District Attorney's Office.
5. On December 6, 2018, the IFS received a referral from the Bradford County District Attorney's Office alleging that the Defendant was billing for services not performed. Additionally, it was alleged that the Defendant engaged in romantic relationships with at least two patients, P.J.S. and M.P.V., and that the Defendant was having sexual contact with P.J.S. during his scheduled appointments. Despite the Defendant not providing any legitimate medical services during these sexual liaisons, she continued to bill P.J.S.'s insurer, Highmark, for services she did not perform.
6. On January 28, 2020, the MFCS received a separate referral from OSIG via an anonymous tip alleging fraudulent billing practices by the Defendant. The referral alleged that the Defendant used her registered nurse to supervise treatments and to call in medications for her patients, including controlled substances. Furthermore,



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it was purported that unlicensed employees of the Defendant were providing services to Medicaid patients and then billing under the Defendant as if the Defendant was the one that rendered the services.

7. Since June 1, 2014, CHIMH and the Defendant were enrolled as Medical Assistance (MA) providers through the Pennsylvania Department of Human Services (DHS), the state agency responsible for overseeing Pennsylvania's MA program (Medicaid). As MA providers, CHIMH and the Defendant enrolled with Community Care Behavioral Health Organization (CCBHO), a managed care organization (MCO) that processes and pays MA claims submitted by MA providers, on May 25, 2016. As a managed care organization, CCBHO is contracted by DHS to manage money from the MA program and pay claims submitted by their network providers for services rendered to their members (MA recipients). The Defendant was assigned provider identification number 102633730 and CHIMH was assigned provider identification number 102943072. The provider identification number is used to identify the provider when submitting claims for reimbursement to the MA program. As MA providers, the Defendant and CHIMH were required to update their provider agreements with DHS and provide information relevant to their ability to practice every five years through a process known as revalidation. If a provider does not revalidate every five years, they lose their ability to bill MA for services.

8. Since December 11, 2014, CHIMH and the Defendant were enrolled with Highmark Blue Shield. Through this enrollment with Highmark Blue Shield, CHIMH and the Defendant billed and were paid for services by Highmark Blue Shield. CHIMH was issued Provider Identification Number 003129701 and the Defendant was issued Provider Identification Number 002664595. As providers, the Defendant and CHIMH enrollment would renew annually unless terminated or the Defendant or CHIMH failed to meet the licensure requirements established by the Department of State.

9. SA Bunchalk interviewed P.J.S. on November 8, 2019. P.J.S. stated that he had become a patient of the Defendant in the fall of 2016. P.J.S. began treatment with Sarah Dekay as his therapist. A short time after starting his sessions at CHIMH, P.J.S. began seeing the Defendant as his therapist. P.J.S. stated soon after the Defendant became his therapist, the sessions turned sexual. He stated that he would see the Defendant two or three times per week for therapy sessions. According to P.J.S., the physical and sexual contact continued for many sessions and was the "norm" for his therapy appointments. At the end of one of his sessions, the Defendant mentioned to P.J.S. that his medical chart needed to be updated for billing purposes. P.J.S. stated that he and the Defendant would meet around town and engage in sexual behavior. The Defendant also had rented an apartment in Athens Borough for the two of them to meet outside of the office. P.J.S. stated that the relationship between him and the Defendant went on for several months until the Defendant started seeing another patient named M.P.V. Eventually the Defendant began dating M.P.V., and moved him into her residence. P.J.S. stated that he was dismissed as a patient by the Defendant in April 2017 and received an official letter from the office in June 2017 indicating services were terminated.

10. On February 10, 2020, SA Bunchalk met with P.J.S. for the purpose of signing an "Authorization for the Release of Health Information." P.J.S. signed the form and it was then presented to the Defendant at the Center for Holistic and Integrative Mental Health, L.L.C. office in Athens Borough, PA. The Defendant provided your affiant with 170 pages of medical records and documents pertaining to care and treatment of P.J.S.

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11. SA Bunchalk reviewed 170 pages of medical records and documents pertaining to the care and treatment of P.J.S., provided by the Defendant. SA Bunchalk noted a letter contained in the file titled "Notification of Discharge." The letter was for P.J.S. which also included his date of birth. The letter cites the "Date of admission" as November 7, 2016 and "Date of Discharge" as May 23, 2017. In further review of the records, it was noted, a billed visit occurred on May 30, 2017, electronically signed by the Defendant on May 30, 2017 at 21:34 (9:34p.m.) utilizing CPT Code 90837. A second billed visit occurred on June 6, 2017, electronically signed by the Defendant at 18:29 (6:29p.m.) utilizing CPT Codes 99214 and 90836. Also noted, was the "Place of Service" showed "office." These two visits were after the date of discharge of May 23, 2017.

12. SA Bunchalk, on or about December 23, 2019, contacted Earl Bock (Bock), Senior Fraud Consultant Special Investigations with Highmark Insurance for claims data pertaining to patient P.J.S. billed by the Defendant. Bock provided the requested documents on or about this same date. In review of those records, the Defendant received in excess of \$3,000 from Highmark for patient care not rendered to P.J.S. The dates of billed services were November 7, 2016 thru June 6, 2017.

13. SA Bunchalk interviewed the Defendant on February 3, 2020 and February 14, 2020. The Defendant stated M.P.V. was a patient in her office starting in early 2017 until early November 2017. According to the Defendant, she and M.P.V. entered into a romantic relationship around the same time (November 2017) he stopped being a patient of CHIMH, and soon after he moved in with her. The Defendant admitted to SA Bunchalk that she wrote prescriptions for M.P.V. during the time of their relationship and believed the insurer for M.P.V. at this time was Medicaid. Although the Defendant did not bill MA to write these prescriptions, she acknowledged MA paid for these prescriptions once they were filled. The Defendant admitted that she would prescribe a higher dose than was medically necessary for M.P.V. and she would then take the excess dosage for herself. The Defendant also admitted to writing prescriptions for her husband, William King (W. King), although she never saw him as a patient. The Defendant stated that she would write the prescription for a higher dose than was medically necessary, and would take the excess dosage for herself. SA Bunchalk asked the Defendant for a copy of her collaborating agreement with Dr. Farrington. The Defendant was unable to locate a copy of her collaborating agreement and stated that she had very little communication with Dr. Farrington. A number of former employees of CHIMH were interviewed and also indicated they did not have any contact with a collaborating physician while working for the Defendant.

14. Your Affiants are familiar with the Pennsylvania Prescription Drug Monitoring Program (PDMP) that is maintained by the Pennsylvania Department of Health (DOH). PDMP collects information on all filled prescriptions for controlled substances (Schedules II through V). PDMP helps prevent prescription drug abuse and helps health care providers safely prescribe controlled substances. The PDMP provides law enforcement the ability to identify prescriptions filled within Pennsylvania only. A review of the PDMP data determined that the Defendant wrote 13 prescriptions for M.P.V. for schedule II and schedule IV controlled substances when the Defendant was no longer seeing him as a patient. SA Yocum reviewed data from the PDMP for the Defendant. It was determined that the Defendant was prescribing controlled substances to commercially and privately insured patients as well as MA recipients from November 2017 through March 2020. SA Yocum's analysis of the PDMP report revealed that over



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3,750 prescriptions were written using the Defendant's DEA registration number to over 300 commercially and privately insured patients and MA recipients during this time. Through the investigation, SA Yocum determined that not only were patients filling prescriptions in Pennsylvania, but some traveled or lived outside of Pennsylvania and filled prescriptions written by the Defendant out of state.

15. SA Yocum obtained records for prescriptions written by the Defendant for M.P.V from Walmart and CVS Pharmacy. Analysis of the records confirmed that the Defendant wrote 13 prescriptions for controlled substances for M.P.V after November 10, 2017, when he was no longer a patient of the Defendant. These prescriptions were written and filled between November 29, 2018 and November 9, 2019.

16. Your Affiants conducted an interview with Wendy Miller (Miller) with the PA Department of State, Board of Nursing (the Board). According to Miller, the collaborative agreement formalizes the relationship between a CRNP and a medical physician which gives the CRNP the ability to practice. Miller described the collaborative agreement as a contract between the two parties. A CRNP may also choose to execute a prescriptive authority collaborative agreement if the CRNP wants the ability to prescribe controlled substances to their patients. Prescriptive authority collaborative agreements are signed by the CRNP and the collaborating physician and then filed with and approved by the Board. The CRNP is also required to maintain a copy of the agreement at their practice location. Miller stated that the CRNP is required to renew the prescriptive authority agreement when their CRNP license expires, which occurs every two years. The renewal form that the CRNP submits to the Board for their prescriptive authority collaborative agreement does not require the signature of the collaborating physician named in the underlying agreement before it is filed and approved by the Board, nor does the Board verify the existence of the relationship between the parties before accepting the renewal. The Board accepts the representations made by the CRNP as true and correct and processes the renewal under the belief that the underlying prescriptive authority collaborative agreement is still valid unless informed otherwise by the CRNP.

17. Miller directed your Affiants to the Professional Nursing Law for additional information regarding the rules and regulations for CRNPs. Your Affiants reviewed those rules and regulations and found the following pertinent information: The State Board of Nursing regulates the practice of CRNPs, like the Defendant, and requires that CRNPs collaborate with a licensed physician in order to provide the expanded treatment functions found at 49 Pa. Code § 21.282a, and in order to prescribe controlled substances under 49 Pa. Code § 21.283. Collaboration is defined by the Professional Nursing Law as a process in which a CRNP works with one or more physicians to deliver health care services within the scope of the CRNP's expertise. 63 P.S. § 212. The process includes the immediate availability of a licensed physician to a CRNP, either directly or by electronic means; a predetermined plan for emergency services; and availability of the physician on a regularly scheduled basis for referrals, review of standards of medical practice incorporating consultation and chart review, drug and other medical protocols within the practice setting, periodic updating in medical diagnosis and therapeutics and cosigning records when necessary to document accountability by both parties. 63 P.S. § 212. According to 49 Pa. Code § 21.285, the CRNP has the responsibility to renew and update the prescriptive authority collaborative agreement at least every two years and is also responsible to notify the Board when the agreement has been terminated.



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18. Your Affiants obtained the Defendant's active prescriptive authority collaborative agreements on file with the DOS, Bureau of Professional & Occupational Affairs, State Board of Nursing from November 2017 to March 2020, which are listed below:

- a. The initial agreement between the Defendant and Dr. Jon R. Grigg (Dr. Grigg) was signed by Dr. Grigg on June 29, 2012. The agreement was subsequently renewed by the Defendant on August 4, 2013, August 16, 2015, September 10, 2017 and September 23, 2019.
- b. The initial agreement between the Defendant and Dr. Quinne R. Farrington (Dr. Farrington) was signed by Dr. Farrington on December 15, 2015. This agreement was subsequently renewed by the Defendant on September 10, 2017 and September 23, 2019.¹

19. Your Affiants interviewed Dr. Grigg who stated that he had previously worked with the Defendant at Concern Counseling (Concern). He stated that he and the Defendant had a collaborative agreement during her time at Concern, which was sometime around 2012. Agents identified a prescriptive authority collaborative agreement on file with DOS, which shows a copy of the agreement that was signed by Dr. Grigg and the Defendant on June 29, 2012. Dr. Grigg believed the collaborative agreement had terminated when the Defendant terminated employment with Concern several years ago. He stated he has not had contact with the Defendant and indicated it was "4 years – maybe even 5 or 6 years since I've spoken with her."

20. Your Affiants interviewed Dr. Farrington who stated that she knew the Defendant from their time working together at Susquehanna Health around 2013. Dr. Farrington stated she served in the role as a preceptor to the Defendant. Dr. Farrington separated from employment with Susquehanna in 2013 and opened her own private practice. Dr. Farrington stated that she had received a call from her former colleague, Dr. Bennett, who advised her that the Defendant was in need of a collaborating physician for the Defendant's practice. Dr. Farrington stated that she entered into a collaborative agreement and a prescriptive authority collaborative agreement with the Defendant in December of 2015. Dr. Farrington confirmed the authenticity of the prescriptive authority collaborative agreement that was on file with DOS, which was digitally signed by the Defendant on December 13, 2015 and by her on December 15, 2015.

21. Dr. Farrington described the two separate agreements that outlined her collaboration with the Defendant: the collaborative agreement, which generally defined the relationship between the parties, and the prescriptive authority collaborative agreement, which gave the Defendant the ability to prescribe controlled substances within the scope of her treatment. Dr. Farrington stated it was her understanding that the collaborative agreement needed to be signed by both parties and updated every two years. Furthermore, she stated that the prescriptive authority collaborative agreement between her and the Defendant should have expired on December 15, 2017 and advised she did not have any further contact with the Defendant to renew or update the agreement. Dr.

¹ The Defendant also renewed her license each time she renewed her prescriptive authority collaborative agreements on the same dates.



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Farrington stated that she was receiving a \$1,000 per month stipend from the Defendant as part of the collaborative agreement, which was deposited into her account via direct deposit. According to Dr. Farrington, the total amount she received from the Defendant was \$10,000 in 2016 and \$6,000 in 2017 for a combined total of \$16,000. Dr. Farrington provided your Affiant with documentation of her bank account in 2016 and 2017 which revealed payments of \$1,000 being deposited into the account up until September 2017 from an account named "The Center for H Payroll." Dr. Farrington stated that she stopped receiving payments in the fall of 2017 and has not received any further payment from the Defendant after the expiration of the agreement.

22. SA Yocum discovered a collaborative agreement dated October 10, 2018, electronically signed by the Defendant and Dr. Farrington. The agreement was identified in the Pennsylvania Provider Reimbursement and Operations Management Information System (PROMISE), Provider Enrollment Automation Program (PEAP), which was submitted to the MA program by the Defendant when she was due for re-validation to be an MA provider. A review of the 2018 collaborative agreement revealed the document was identical to the 2015 collaborative agreement between the Defendant and Dr. Farrington with the only difference being the dates on the agreement and the dates following the electronic signatures. There was also a substitute physician listed on the collaborative agreement between the Defendant and Dr. Farrington named Dr. Sayed Shaheer Alamy (Dr. Alamy). However, Dr. Alamy's signature did not appear on either document.

23. Your Affiants interviewed Dr. Farrington a second time following the discovery of a collaborative agreement dated October 10, 2018, with Dr. Farrington's name and signature on it. Dr. Farrington stated that she did not sign the 2018 collaborative agreement, nor was she aware of its existence. Dr. Farrington again stated she had not had contact with the Defendant since the fall of 2017. Additionally, Dr. Farrington again confirmed that the financial stipend's also stopped completely in the fall of 2017. According to Dr. Farrington, the Defendant never actually sought her assistance or 'collaborated' with her nor was Dr. Farrington ever physically present at the Defendant's practice located at 307 N Main St, Athens, PA.

24. SA Yocum interviewed Dr. Alamy, who stated that he knew the Defendant from his time working together at Susquehanna around 2009 or 2010 while the Defendant was a student. Eventually, the Defendant graduated from school and began employment at Susquehanna as a Nurse Practitioner. Dr. Alamy stated that the last time he has had any type of contact with the Defendant was in 2011. According to Dr. Alamy, the Defendant did not like psychiatrists and often referred to them as "stupid." Dr. Alamy stated he never acted as a substitute collaborative doctor for the Defendant at her private practice. Dr. Alamy stated he was not aware that his name was listed on the Defendant's collaborative agreement or on her prescriptive authority collaborative agreement as a substitute collaborative physician. SA Yocum showed Dr. Alamy the collaborative agreements dated December 2015 and October 2018 and a prescriptive collaborative agreement from December 2015. Dr. Alamy stated he was not familiar with the documents. Dr. Alamy stated that there was no formal agreement between him and the Defendant where he had agreed to be her substitute collaborative doctor. Dr. Alamy stated he was aware that his ex-wife, Dr. Farrington, had entered into an agreement with the Defendant after the Defendant opened her private practice. He stated he believed Dr. Farrington was the Defendant's collaborating physician for approximately one year.



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25. SA Yocum interviewed Barbara Judy (Judy), Supervisor of Provider Enrollment with DHS. Judy explained the enrollment and revalidation process for MA providers, such as the Defendant. After initially becoming credentialed, a provider is required to get revalidated every five years. Providers are required to go through the enrollment / revalidation process which includes submitting an application and supporting documentation. Once the application is submitted via an online portal, it is date/time stamped and there is an electronic system of checks conducted before it is assigned to a person employed by DHS for further review. Ultimately, once the application passes to the individual worker with DHS, it is reviewed and then approved, sent back for further information, or denied.

26. According to Judy, the Defendant submitted a revalidation application on April 3, 2019, via the online portal. On May 6, 2019 the Defendant's revalidation was returned to the Defendant with the message "We will need an updated Collaborative Practice Agreement." Judy provided SA Yocum with a copy of the collaborative agreement that the Defendant initially submitted on April 3, 2019, which was with Dr. Farrington's signature from 2015. The Defendant then re-submitted the application on May 7, 2019 and July 3, 2019 with the collaborative agreement signed on October 10, 2018. DHS ultimately accepted the application with the collaborative agreement signed on October 10, 2018 and renewed the Defendant's provider agreement. The Defendant's MA provider agreement would have expired on June 1, 2019, if DHS would not have accepted the forged collaborative agreement as part of her renewal.

27. SA Yocum requested and received credentialing records from CCBHO for the Defendant and CHIMH. Those records included the Defendant's obligations as a provider in the CCBHO network and the Defendant's communications with CCBHO. On November 14, 2017, CCBHO responded to the Defendant's November 6, 2017 inquiry about her billing practices and provided the Defendant with practice guidelines for CRNPs. Those guidelines also stated that CRNPs can only practice while collaborating with a Pennsylvania licensed physician.

28. On or about August 6, 2021, SA Bunchalk spoke with Bock in regards to credentialing within Highmark Insurance. Bock indicated that Highmark verifies the license through the Department of State (DOS). Although Highmark does not require the provider to submit a collaborative agreement during the application process, Highmark does monitor the provider's license on a monthly basis. Highmark will terminate the provider if the license is: suspended, revoked or expired. Highmark would also not pay claims if the collaborative agreement was not in place.

29. On February 4, 2022, your Affiants conducted an interview with Bock pertaining to provider agreements and billing practices for the defendant. Bock specifically referenced Highmark policy Z-27. In that policy, it states the qualifications that the provider needs to maintain and abide by in order for Highmark to payout any billing for medical services. Bock highlighted that providers are governed by the state licensure or certification statutes and regulations applicable to their profession. It is the responsibility of the provider to meet and maintain any certification and licensure requirements to receive payment for billed medical services. Bock also stated, providers are informed upon signing onto Highmark, all medical policies are made available to the provider and it is the responsibility of the provider to abide by Highmark policy.

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30. During the February 4, 2022 interview, your Affiants went over payments paid to the Defendant by Highmark during the time period of November 1, 2017 through March 24, 2020. These payments were paid to the Defendant by Highmark for billed medical services. The defendant submitted claims for over 400 individual Highmark recipients which totaled over 4,000 claims that were paid to the Defendant in excess of \$300,000.00.
31. Your Affiants also questioned Bock about whether Highmark would have paid for billed medical services while the provider was actively engaging in sexual relations with the patient during the actual office visit. Bock stated that Highmark would not have paid a claim(s) to the provider, who was engaged in such relations during the visit.
32. Your Affiants obtained records from Intuit Inc.; the payroll system used by the Defendant in her practice. The Intuit records confirmed Dr. Farrington was hired on December 13, 2015 and lists her salary as \$1,000 per month. Analysis of the payroll records revealed that Dr. Farrington was paid a total of \$16,000 by the Defendant with the initial payment being made January 1, 2016 and the last payment being on September 29, 2017. SA Yocum confirmed that to pay Dr. Farrington, the Defendant had to manually select her in the software and authorize payment.
33. SA Yocum requested and received the Defendant's claims submissions from CCBHO and conducted analysis on the claims submitted between November 1, 2017 and February 10, 2020. During that time, the Defendant submitted claims for over 250 individual MA recipients which totaled over 2,000 claims billed in excess of \$100,000.00.
34. Based on the facts above, the Defendant was not collaborating within the meaning of the Professional Nursing law, 63 P.S. §212(13), and as a result, was providing treatment and prescribing controlled substances to patients below accepted medical treatment standards. The Defendant's relationship with Dr. Farrington had ended on October 31, 2017, but the Defendant continued to practice, prescribe controlled substances, and submit documents to the Board as if the two were still collaborating. Furthermore, the Defendant submitted a forged document to DHS for the purpose of obtaining authorization to provide services as a MA provider.
35. Your Affiants have probable cause to believe that, in a continuous course of conduct, the Defendant knowingly submitted a forged collaborative agreement to DHS, on or about May 7, 2019, without the consent of Dr. Farrington, to gain authorization to furnish services under MA until March 25, 2020. In doing so, the Defendant knowingly made false alteration of a document received by the government with the intent that it be taken as genuine part of her application.
36. Your Affiants have probable cause to believe, that beginning on or about November 10, 2017 and ending on November 9, 2019, in a continuous course of conduct, the Defendant did knowingly refer M.P.V. to another provider by prescription for controlled substances that were prescribed below the accepted medical treatment standards, not issued in good faith, and outside the scope of the patient relationship. Additionally, the Defendant did knowingly obtain controlled substances through M.P.V. by subterfuge.



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37. Your Affiants have probable cause to believe that, in a continuous course of conduct, the Defendant engaged in unlawful conduct which defrauded Medical Assistance by knowingly submitting fraudulent claims to CCBHO from November 1, 2017 through February 10, 2020 which were false and below accepted medical treatment standards. In combination, these schemes, which created the false impression that the Defendant had provided services as duly licensed professional when she had not, caused the theft of greater than \$100,000 from Medical Assistance.

38. Your Affiants have probable cause to believe the Defendant, engaged in unlawful conduct by intentionally submitting claims to Highmark, for the care of P.J.S. for a period of November 7, 2016 through June 6, 2017, which were false and contained misleading information, in that the Defendant engaged in a sexual relationship with P.J.S., during scheduled office appointments, while still practicing as a medical provider for P.J.S. and received payment from Highmark in excess of \$3,000.

39. Your Affiants have probable to believe that the Defendant, knowingly and with the intent to defraud Highmark Insurance, submitted claims with false, incomplete or misleading information from November 1, 2017 through March 24, 2020. The Defendant when filing these claims, presented herself a duly licensed professional, when in fact she did not meet the requirements of licensing, as outline by the Department of State, causing Highmark to pay on these claims in excess of \$300,000.00.

40. Your Affiants have probable cause to believe that from November 1, 2017 until March 24, 2020, in a continuous course of conduct, the Defendant prescribed controlled substances below accepted medical treatment standards, not in good faith, and outside the scope of the patient relationship, while not properly licensed under the Professional Nursing Act. In addition, those prescriptions written by the Defendant and filled by Highmark and MA recipients caused Highmark and MA to reimburse claims billed by the pharmacies for the fraudulent prescriptions.

41. Your Affiants believe the facts contained in this affidavit are sufficient probable cause to warrant the arrest of the Defendant for the following crimes: Insurance Fraud, 18 Pa.C.S. §4117(a)(2), Medicaid Fraud, 62 P.S. §1407(a)(1),(6),(7), Violations of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. §780-113(a)(12),(14), Theft by Deception, 18 Pa.C.S. §3922(a)(1), Forgery, 18 Pa.C.S. §4101(a)(1),(2),(3), Tampering with Public Records, 18 Pa.C.S. §4911(a)(1),(2).

42. The above statements and information are true and correct to the best of our 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.



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- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 8.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

SAID-0 Manby
(Signature of Affiant)

AND NOW, on this date Feb 24, 2022 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

42-3-02
(Magisterial District Court Number)

[Signature]
(Issuing Authority)

SEAL



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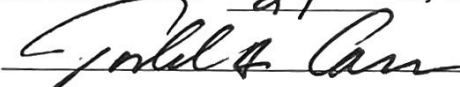
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I, SA MATTHEW G. YOCUM / SA DAVID BUNCHALK, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.


(Signature of Affiant)

Sworn to me and subscribed before me this 24th day of Feb 2022

 Date 2022, Magisterial District Judge

My commission expires first Monday of January, 2024

SEAL