

G Jones

NOV 21 2012

INFORMATION (FELONY) PATRICIA PRESLEY, COURT CLERK

CF-2012-7165

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,)	
Plaintiff,)	
)	
vs.)	INFORMATION
)	
ROBERT C. CAMP, JR.,)	
Defendant.)	

In the name and by the authority for the State of Oklahoma, comes now E. SCOTT PRUITT, the duly elected, qualified, and acting Attorney General of the State of Oklahoma, and on his official oath informs the District Court that:

COUNT 1: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between June 1, 2011 through June 25, 2011, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 66 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 2: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between June 26, 2011 through July 25, 2011, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 118 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 3: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between July 26, 2011 through August 25, 2011, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 65 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 4: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between September 26, 2011 through October 25, 2011, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 91 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 5: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between October 26, 2011 through November 25, 2011, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 83 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 6: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between November 26, 2011 through December 25, 2011, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 239 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 7: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between December 26, 2011 through January 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 94 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 8: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between January 26, 2012 through February 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 136 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 9: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between February 26, 2012 through March 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 211 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 10: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between March 26, 2012 through April 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 114 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 11: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between April 26, 2012 through May 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 262 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 12: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between May 26, 2011 through June 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 617 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 13: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between June 26, 2012 through July 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 429 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 14: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between July 26, 2012 through August 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 258 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 15: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between August 26, 2012 through September 25, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 139 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

COUNT 16: MEDICAID FRAUD [56 O.S. §1005(A)(1)]

On or between October 31, 2012 through November 1, 2012, in Oklahoma County, Oklahoma, Defendant ROBERT C. CAMP, JR. committed the crime of MEDICAID FRAUD, a felony in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program, through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for 57 pairs of eyeglasses reimbursed by Medicaid but not having been provided to Medicaid recipients.

All in violation of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

Dated this 20 day of November, 2012.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

BY:

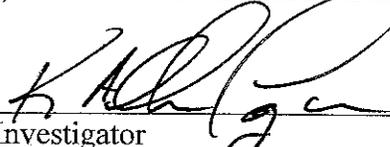


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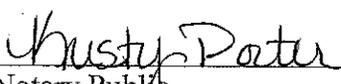
State of Oklahoma)

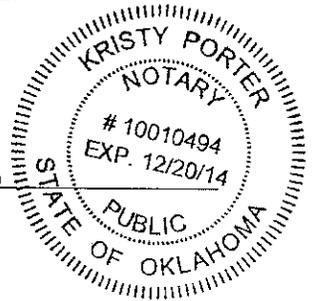
County of Oklahoma) ss.

I, Allen Logan, being duly sworn upon oath, state that I have read the above and foregoing Information and know the contents thereof, and that the facts stated herein are true.


Investigator
Medicaid Fraud Control Unit

Subscribed and sworn to before me this 20 day of November, 2012.


Notary Public



Witnesses for the State of Oklahoma:

Robert C. Camp; contact Oklahoma Attorney General's Office

Fred Oraene, Data Processing Analyst & Planning Specialist; Information Systems; Oklahoma Health Care Authority; 2401 NW 23rd ST., Ste. 1A; Oklahoma City, OK 73107-2423

Paula Printup-Porter, Senior Systems Analyst; Program Integrity Unit; Oklahoma Health Care Authority; 2401 NW 23rd ST., Ste. 1A; Oklahoma City, OK 73107-2423

Beth VanHorn, Legal Operations Director; Oklahoma Health Care Authority; 2401 NW 23rd ST.; Oklahoma City, OK 73107-2423

Justin Etchieson; Medicaid Fraud Control Unit; Oklahoma Attorney General's Office; 313 NE 21st ST.; Oklahoma City, OK 73105-3207

Allen Logan; Medicaid Fraud Control Unit; Oklahoma Attorney General's Office; 313 NE 21st ST.; Oklahoma City, OK 73105-3207

STATE OF OKLAHOMA)
) SS.
COUNTY OF OKLAHOMA)

**AFFIDAVIT OF PROBABLE CAUSE
FOR ARREST WARRANT OF ROBERT C. CAMP JR.
MEDICAID FRAUD, 56 O.S. § 1005 (A) (1)**

Allen Logan, being of lawful age and after having affirmed upon his oath to tell the truth, states as follows:

I have been a certified peace officer in Oklahoma since 1988, and I am currently employed as a criminal investigator in the Oklahoma Attorney General's Office, Medicaid Fraud Control Unit, where I have been so employed since September of 1997.

On August 30, 2012, your affiant was assigned to investigate possible Medicaid Fraud by Robert C. Camp Jr. who was an employee at the Dr. Robert Camp Optometry Clinic, located at 2515 SW 59th, Oklahoma City, Oklahoma, 73319. Dr. Robert Camp is contracted with the Oklahoma Health Care Authority (OHCA) to provide optometry services to Medicaid recipients. The OHCA is the single state agency in Oklahoma responsible for administering Medicaid Funds to providers of health care services; located at 2401 NW 23rd St. Ste. 1A in Oklahoma City.

Your affiant states that Auditor/Analyst Justin Etchieson who is employed with the Medicaid Fraud Control Unit of the Oklahoma Attorney General's Office accessed the computerized files of the OHCA and reviewed the individual billing data for the Camp Optometry Clinic. A control date of January 1, 2011 through August 31, 2012 was then used for the purposes of investigation. It was then verified that there were many pairs of glasses billed to the OHCA per month during the investigation period.

Your affiant states that on September 9, 2012, a subpoena was issued to Dr. Camp's office for the recovery of specific client files. Once the files were received on September 18, 2012, they were reviewed and investigators were unable to find pertinent documentation

regarding the dispensing of glasses.

Your affiant states that on September 20, 2012, an interview was conducted with Dr. Camp in the presence of his attorney. During this interview it was learned that Dr. Camp only worked half days, during the investigation period, and that his son, Robert Camp Jr. worked as the office manager. Robert Camp Jr. was responsible for placing examination sheets into files, ordering glasses, and using the computer to submit Medicaid Claims through the OHCA secure web site on behalf of the Dr. Robert Camp Optometry Clinic. Dr. Camp professed he does not submit electronic claims to the OHCA because he does not understand nor does he know how to operate the online claim process. Dr. Camp expects his son, Robert C. Camp Jr. to submit electronic claims to the OHCA.

Dr. Camp utilizes Team Effort Optical, exclusively, for the construction of glasses. On September 26, 2012, a subpoena was issued to Team Effort Optical regarding their billing to Dr. Camp's office. On October 3, 2012, the information was received and analyzed, it was at this time that the target date range was extended from January 1, 2011 to June 1, 2011, to an ending date of November 1, 2012. It was determined that there were no other local optical companies who provided service to Dr. Camp, by contacting the only three individual optical companies in the Oklahoma City Metro area.

Auditor/Analyst Justin Etchieson and your affiant conducted an analysis by comparing the Team Effort Optical billing to Dr. Camp, and the billing submissions from Dr. Camp to the OHCA. It was determined that there was considerable more billing to OHCA for glasses than what was constructed by Team Effort. According to the OHCA one pair of glasses included frames, two lenses, and usually scratch resistant coating on each lense, which is an aggregate amount of \$175.23 allowable amount per pair of glasses. Etchieson and your affiant reviewed each Team Effort Optical invoice to determine the number of glasses produced to Dr. Camp. This number of produced glasses was compared to the Camp OHCA billings for the same time period. The remaining difference, glasses billed but not produced, was multiplied by the OHCA reimbursement limit of \$175.23. This product represents the amount of money fraudulently paid to Camp by the OHCA, per Team Effort Optical invoice. This method of calculation was applied to each Team Effort Optical invoice and is reflected in the attached spreadsheet. As a result of the complete analysis it was determined that there were a total of five hundred and twenty four (524) pairs of glasses constructed while the OHCA was billed for three thousand four hundred ninety six (3,496) pairs

of glasses. A total amount of over billing was found to be \$359,459.53 from June 1, 2011, through November 1, 2012.

OHCA documentation reflects that OHCA weekly billing payments were made to Dr. Camp's Arvest Bank Account #19016357. During the interview with Dr. Camp he turned over two checks on Corner Stone Bank Account #289249 which was entitled as Bob Camp Mobile Music, a business owned by Robert Camp Jr. Dr. Camp also produced a deposit statemtn from OHCA into Corner Stone Account #294331, as well as Corner Stone Bank Statements for the same account revealing Robert Camp Jr. as the account holder.

Dr. Robert Camp closed his optometry clinic prior to the September 20, 2012, interview and changed the locks on the building, yet billings to the OHCA continued.

Your affiant requests, upon probable cause, the court issue a warrant for the arrest of for Robert Camp Jr. For Medicaid Fraud pursuant to Title 56 O.S. §1005 (A) (1).

Further, your affiant sayeth not.



Deputy Chief Investigator
Allen Logan

Subscribed and affirmed before me this 20 Day of November, Two Thousand and Twelve.



Kristy Porter, Notary Public



My commission expires:

12-20-14

Invoice Dates	Invoiced Units	Units Billed OHCA	Units Paid OHCA	Difference	Potential Payment Inv Units * \$175.23	Potential Overpayment
6/1/2011-6/25/2011	32	98	\$ 9,584.55	66	\$ 5,607.36	\$ 3,977.19
6/26/2011-7/25/2011	41	159	\$ 17,393.00	118	\$ 7,184.43	\$ 10,208.57
7/26/2011-8/25/2011	50	115	\$ 16,234.87	65	\$ 8,761.50	\$ 7,473.37
8/26/2011-9/25/2011	16	9	\$ 1,251.85	(7)	\$ 2,803.68	\$ (1,551.83)
9/26/2011-10/25/2011	34	125	\$ 14,485.25	91	\$ 5,957.82	\$ 8,527.43
10/26/2011-11/25/2011	24	107	\$ 12,396.49	83	\$ 4,205.52	\$ 8,190.97
11/26/2011-12/25/2011	26	265	\$ 30,434.25	239	\$ 4,555.98	\$ 25,878.27
12/26/2011-1/25/2011	35	129	\$ 17,847.85	94	\$ 6,133.05	\$ 11,714.80
1/26/2012-2/25/2012	35	171	\$ 19,265.30	136	\$ 6,133.05	\$ 13,132.25
2/26/2012-3/25/2012	29	240	\$ 33,373.36	211	\$ 5,081.67	\$ 28,291.69
3/26/2012-4/25/2012	44	158	\$ 21,500.70	114	\$ 7,710.12	\$ 13,790.58
4/26/2012-5/25/2012	14	276	\$ 37,342.94	262	\$ 2,453.22	\$ 34,889.72
5/26/2012-6/25/2012	25	642	\$ 88,203.94	617	\$ 4,380.75	\$ 83,823.19
6/26/2012-7/25/2012	45	474	\$ 64,808.10	429	\$ 7,885.35	\$ 56,922.75
7/26/2012-8/25/2012	64	322	\$ 41,407.70	258	\$ 11,214.72	\$ 30,192.98
8/26/2012-9/25/2012	10	149	\$ 18,568.85	139	\$ 1,752.30	\$ 16,816.55
*10/31/2012-11/01/2012	0	57	\$ 7,181.05	57	\$ -	\$ 7,181.05
	524	3,496	\$451,280.05	2,972	\$ 91,820.52	\$ 359,459.53