

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

STATE OF OKLAHOMA,)
Plaintiff,)
)
vs.)
)
LAKISHA RENEE SAMUEL,)
Defendant.)

OCT 11 2011

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

INFORMATION

In the name and by the authority for the State of Oklahoma, comes now ^{Deason} 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)]

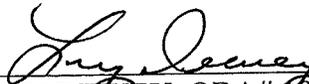
On or between April 1, 2011 through June 30, 2011, in Oklahoma County, Oklahoma, Defendant LAKISHA RENEE SAMUEL committed the crime of MEDICAID FRAUD, a felony, in violation of Title 56 O.S. Section 1005(A)(1), by willfully and knowingly causing to be submitted to the Oklahoma Medicaid Program through its fiscal agent, false claims for payment in the aggregate amount of more than \$2,500.00 for Medicaid services not provided to Q.C., S.C., E.C., and/or A.C., clients of Cornerstone Counseling & Consulting, Inc.

Medicaid Fraud is punishable by imprisonment not to exceed three years, or a fine of not more than three times the amount of payments illegally claimed or received or \$10,000.00, whichever is greater, or by both such imprisonment and fine.

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

Dated this 10 day of October, 2011.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

BY: 
LORY DEWEY, OBA# 19540
Assistant Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
(405) 521-3921

State of Oklahoma)
County of Oklahoma) ss.

I, April D. Woodard, 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.

April D. Woodard
Investigator
Medicaid Fraud Control Unit

Subscribed and sworn to before me this 10 day of October, 2011.

Kristy Porter
Notary Public

My Commission Expires: 12-20-14



Witnesses for the State of Oklahoma:

- Susan Lowrey; Program Integrity & Accountability Unit; Oklahoma Healthcare Authority; 2401 NW 23rd ST., Ste. 1A; Oklahoma City, OK 73107-2423
- Beth VanHorn; Oklahoma Healthcare Authority; 2401 NW 23rd ST., Ste. 1A; Oklahoma City, OK 73107-2423
- Paula Printup-Porter; Oklahoma Healthcare Authority; 2401 NW 23rd ST., Ste. 1A; Oklahoma City, OK 73107-2423
- Rick Pierson, Executive Director; Oklahoma State Board of Licensed Alcohol and Drug Counselors; 101 NE 51st ST.; P.O. Box 54388; Oklahoma City, OK 73154-1388
- Nicole Watson; Cornerstone Counseling & Consulting, Inc.; 4232 N. Santa Fe Ave.; Oklahoma City, OK 73118-8517
- Valerie Lewis, Executive Director; Cornerstone Counseling & Consulting, Inc.; 4232 N. Santa Fe Ave.; Oklahoma City, OK 73118-8517
- Rannette Martin, Executive Assistant; Cornerstone Counseling & Consulting, Inc.; 4232 N. Santa Fe Ave.; Oklahoma City, OK 73118-8517
- Gregory Brown; 2420 N.W. 59th ST.; Oklahoma City, OK 73112
- Jennifer Swope; 221 Tecumseh Ridge Cir.; Norman, OK 73069-8324
- Q.C., S.C., E.C., and/or A.C. c/o Melinda Forga; Oklahoma County Department of Human Services; 5905 N. Classen CT.; Oklahoma City, OK 73118
- April Woodard; Oklahoma Office of Attorney General; 313 NE 21st ST.; Oklahoma City, OK 73105-3207
- Dan Prykryl; Oklahoma Office of Attorney General; 313 NE 21st ST.; Oklahoma City, OK 73105-3207

NOTICE OF OPEN PROSECUTION RECORD

COMES NOW the State of Oklahoma and hereby gives Notice to the Defendant and counsel that pursuant to 22 O.S. §258, all law enforcement reports in the possession of the Attorney General are available for inspection in the Office of the Attorney General during normal business hours and upon reasonable notice to the assigned Assistant Attorney General.

C., E. C., A. C. and Q. C. After affiant received the records a spreadsheet was created with the dates, times and type of services that were billed to the OHCA.

On July 28, 2011 your affiant interviewed Swope at her residence located at 221 Tecumseh Ridge Circle, Norman, OK 73069. The spreadsheet was taken to Swope to verify the dates and times as dates and times that Samuel saw the Chavez children. None of the dates and times matched the dates and times that were in the progress notes and had been billed by Cornerstone Counseling & Consulting Inc. Swope provided a written statement and copies were made of her monthly calendar, February through July 2011. The statement by Swope included all the dates and times someone from Cornerstone Counseling & Consulting Inc. made contact with her and saw the Chavez children. Swope stated she has never attended counseling with Samuel or any of the four Chavez children. The total amount billed by Cornerstone Counseling & Consulting Inc. for sessions by Samuel for all four of the Chavez children was \$3,710.88.

On August 3, 2011 your affiant interviewed Nicole Watson, co-owner of Cornerstone Counseling & Consulting Inc. Watson stated that Samuel was currently employed as a part-time contractor, Licensed Alcohol and Drug Counselor (LADC) under supervision. Samuel is paid a percentage of what she bills for services she provides. Cornerstone Counseling & Consulting Inc. uses Milan Medical as their billing software. Each counselor has their own login and password to enter their progress notes into the Milan system. Once a progress note is entered by the counselor it is reviewed by Greg Brown. Brown will review each progress note to verify the information OHCA requires is included. When the notes are approved Brown will submit the progress notes to OHCA for payment.

On August 9, 2011 your affiant interviewed Gregory Brown, Cornerstone Counseling & Consulting Inc. quality review/ billing employee. Brown stated that he reviews all the progress notes submitted by every counselor at Cornerstone. He checks to make sure all the information is included that OHCA requires for billing. Brown will also reject progress notes for having the wrong billing code, missing specific information, human error and missing information in the notes regarding the goals of the counseling session.

On September 14, 2011 your affiant interviewed Lakisha Samuel at the Oklahoma City office of the Attorney General. Samuel started working for Cornerstone Counseling & Consulting Inc. from September 2010 through August 2011 as an LADC under supervision. Samuel was assigned to S. C., E. C., A. C. and Q. C. to provided counseling. She started seeing the Chavez children sometime in April or May 2011 and would visit them at their residence. Samuel was asked to review progress notes she submitted for services she provided and indicate who was present at the sessions and to initial and dates each note. There were a total of 6 different dates per child she was asked to review. The notes were billed for individual/ family counseling sessions with the client present. On each progress note Samuel stated that

the foster Mother, Swope, was present with the minor child for the session. Samuel stated she had never provided a progress note for services to be billed that she did not provide the services. Samuel did submit progress notes for billing for times and dates that the Chavez children were attending school and during weekends. Swope had stated during her interview that Samuel never saw the children on weekends or while they were attending school. Samuel was told that every date she submitted progress notes for each of the Chavez children did not match the times and dates that Swope had listed on her calendar. Samuel explained that the Chavez children's biological parents, Robin and Rafael Chavez, were being seen by a different counselor at the same time she was seeing the children. She stated when she would attempt to enter the progress notes the units were not available for billing. She would change the dates to available dates and times on the progress notes for billing any available units. Samuel completed a sworn affidavit for Investigator Woodard. In the statement Samuel stated she did change the progress notes dates and times and submitted them for billing. Samuel took no real responsibility for fraudulent billing and continued to blame the agency for the changes she made on the progress notes.

I request, upon probable cause, the court issue a warrant for the arrest of Lakisha Renee Samuel on the charge of Medicaid Fraud 56 O.S. § 1005.

Further, your affiant sayeth not.

April D. Woodard
April D. Woodard

Subscribed and affirmed before me this 6 Day of October
Two Thousand Eleven.

Kristy Porter
Kristy Porter

My commission expires:

12-20-14

