

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR THE COUNTY OF PASCO, STATE OF FLORIDA**

STATE OF FLORIDA

CASE NUMBER

VS.

DIVISION:

PAMELA ANNE PETERSON

BEFORE ME, _____, A LAW ENFORCEMENT OFFICER, personally appeared Law Enforcement Investigator Robert Snetsinger who, first being duly sworn, deposes and states that he has reason to believe that certain laws of the State of Florida have been violated, in particular: Medicaid Provider Fraud, more than \$10,000 but less than \$50,000, 2nd Degree Felony, Florida State Statute §409.920(2). The facts outlined in this affidavit establish probable cause to believe that the laws of the State of Florida relative to the above have been violated by **PAMELA ANNE PETERSON** in Pasco County and Leon County for the Sixth and Second Judicial Circuits. The said offenses occurred in two or more judicial circuits in the State of Florida as part of a related transaction.

Defendant's Identification

PAMELA ANNE PETERSON:

W/F, DOB: [REDACTED] last known address of [REDACTED]
[REDACTED] Florida Driver's License [REDACTED]

The probable cause in support of this allegation is based upon the following facts:

Your Affiant, Robert Snetsinger, is a law enforcement officer for the State of Florida Office of Attorney General, Medicaid Fraud Control Unit (MFCU). Your Affiant, Robert Snetsinger, is currently employed as a sworn and certified law enforcement officer with the state of Florida, serving as a Law Enforcement Investigator II within the Office of the Attorney General, Department of Legal Affairs, Medicaid Fraud Control Unit (MFCU), Tampa. Your Affiant has been a certified Law Enforcement Officer in the state of Florida since December 2016, having graduated from a law enforcement recruit program recognized

by the Florida Department of Criminal Justice Standards and Training Commission and retired from law enforcement in the State of Vermont after 20 years of service. Your Affiant has been with the Tampa MFCU for over three years. As a result of combined training and experience, your Affiant is conversant with investigations involving crimes against persons, theft, fraud and various other financial crimes. Many of these investigations have led to the arrest and successful prosecution of individuals for violations of state statutes.

This Affidavit details an investigation conducted by the MFCU in which your Affiant discovered that from July 4, 2017 through December 1, 2018, **PAMELA ANNE PETERSON** did commit Medicaid provider fraud by causing the submission of claims for services that were not provided.

BACKGROUND

Medicaid is the state and federal partnership that provides healthcare coverage for selected categories of people with low incomes. The purpose of the program is to provide medical assistance and health care coverage for categories of individuals whose income and resources are insufficient to meet the costs of their medical services. The Agency for Health Care Administration (AHCA) is the State of Florida Agency which is responsible for the administration of the Medicaid program.

The MFCU exists to investigate Medicaid fraud occurring in the State of Florida. The MFCU is under the authority and supervision of the Office of the Attorney General of the State of Florida. Pursuant to Florida Statute Chapter 16, Section 16.59, the MFCU is authorized to investigate all violations of Florida Statute Chapter 409.920, Medicaid Provider Fraud, and any other criminal violations discovered during those investigations.

DXC Technology (DXC) is the fiscal agent for the State of Florida that administers program funds to Medicaid Providers and is located in Tallahassee, Leon County, Florida. DXC also provides claims data used to review claims submitted by providers to the Medicaid Program, and payments made to the providers from the Medicaid Program. Current business practice is that all Medicaid billing is done electronically, i.e., computer transmittal.

DEFINITIONS

“**Non-Emergency Transportation Services**” (NET) is authorized under the Social Security Act. The Florida NET program was implemented through Chapter 409, Florida Statutes and the Florida Administrative Code. The purpose of NET is to transport Medicaid recipients to a qualified Medicaid provider for medically necessary and Medicaid compensable services.

FACTS

An investigation conducted by the Florida Attorney General’s MFCU revealed that **PAMELA ANNE PETERSON** was an Independent Contractor employed by Logisticare Solutions, LLC as a transportation vendor, also referred to as a driver, to provide transportation services to Medicaid recipients. According to Florida Medicaid records, provided by DXC, Logisticare Solutions, LLC based in Miami, Miami-Dade County, Florida is enrolled as an authorized Medicaid provider under Provider Number [REDACTED] effective December 11, 2009, as an Individual Practice provider of Non-Emergency Transportation Services.

PAMELA ANNE PETERSON committed Medicaid provider fraud through an organized scheme of submitting falsified Mileage Reimbursement Trip Logs to Logisticare Solutions, LLC that alleged services were provided. Those falsified documents were then used in the submission of claims to the agency or its fiscal agent or a managed care plan for payment. As a result of **PAMELA ANNE PETERSON**’s submission of falsified documentation, false claims were billed and Medicaid funds totaling at least \$15,606.00 were paid for services that were not rendered. Those Medicaid funds were reimbursed to Logisticare Solutions, LLC who then paid **PAMELA ANNE PETERSON** by paper checks mailed to her home address [REDACTED]

The Medicaid recipient for whom **PAMELA ANNE PETERSON** submitted the falsified documentation which alleged services were being provided for a specific number of units each day was interviewed. They provided testimony that **PAMELA ANNE PETERSON** did not provide the total units of services that were billed.

A preliminary investigation was opened on January 9, 2019, to determine if **PAMELA ANNE PETERSON** knowingly falsified documents which she knew would then be used in the

submission of claims to the Medicaid program for reimbursement for services that were not provided, and thus causing false claims to be submitted to the agency or its fiscal agent or a managed care plan for payment in violation of Florida State Statutes. This investigation focused on NET activities by **PAMELA ANNE PETERSON** provided to Medicaid recipient [REDACTED] (initials of the recipient are being used to protect the identity of the witness) that occurred between July 4, 2017 and December 1, 2018. During this time frame, claims data shows Logisticare Solutions, LLC electronically billed for and received direct payment of \$19,038.00 from Medicaid for NET services to [REDACTED]

PAMELA ANNE PETERSON, under the direction of Logisticare Solutions, LLC, was authorized by AHCA to provide NET services. All services provided by **PAMELA ANNE PETERSON** that were billed to Medicaid by Logisticare Solutions, LLC were for NET. These services are outlined through AHCA under the Medicaid program.

As a Logisticare Solutions, LLC contractor the provider of NET services documents information such as the recipient name, trip date, trip authorization number, name and phone of the destination medical provider and total miles on a “Florida Mileage Reimbursement Trip Log” form. That form is then submitted to Logisticare Solutions, LLC and used to calculate an amount for reimbursement to the driver of a Medicaid recipient for transportation services.

Your affiant reviewed documents obtained from Logisticare Solutions, LLC for this investigation to include “Florida Mileage Reimbursement Trip Log” forms submitted via U.S. Mail by **PAMELA ANNE PETERSON** as the driver for [REDACTED]. That documentation showed that between February 19, 2016 and at least December 31, 2019, their client, [REDACTED] was provided NET services. Within that date range, between July 4, 2017 and December 1, 2018, those services were provided exclusively by **PAMELA ANNE PETERSON** for rides from [REDACTED] home address of [REDACTED] to the address of [REDACTED] [REDACTED] each and every ride.

The Logisticare Solutions, LLC documents further showed that all rides provided to [REDACTED] from home to [REDACTED] prior to July 4, 2017 occurred one day per week and were by drivers other than **PAMELA ANNE PETERSON**, all rides provided to [REDACTED] from home to [REDACTED] [REDACTED] between July 4, 2017 and December 1, 2018 occurred virtually every day

and were by **PAMELA ANNE PETERSON** only, and all rides provided to [REDACTED] from home to [REDACTED] after December 1, 2018 occurred one day per week and were by drivers other than **PAMELA ANNE PETERSON**.

The Logisticare Solutions, LLC documents also included pay checks issued by Logisticare Solutions, LLC to **PAMELA ANNE PETERSON** at [REDACTED]. There were a total of 64 pay checks with issue dates between July 18, 2017 and December 4, 2018, amounting to a total of \$53,501.50 and all were endorsed with **PAMELA ANNE PETERSON**'s signature and cashed at businesses in the Pasco County area including Check 'N Go, ACE Cash Express, and Hick's Discount Beverage.

Your affiant obtained records via administrative subpoena from Check N' Go. The records noted **PAMELA ANNE PETERSON** was a Check N' Go registered client identified by her Florida Driver's License. The records also identified four transactions between October 14, 2017 and March 3, 2018, where **PAMELA ANNE PETERSON** cashed checks issued to her by Logisticare Solutions, LLC at Check N' Go.

Your affiant obtained records via administrative subpoena from ACE Cash Express. Those records stated **PAMELA ANNE PETERSON** was an ACE Cash Express registered client identified by her Florida Driver's License. The records further identified eleven transactions between August 20, 2017 and February 12, 2018, where **PAMELA ANNE PETERSON** cashed checks issued to her by Logisticare Solutions, LLC at ACE Cash Express.

Your affiant requested records related to Logisticare Solutions, LLC checks cashed by **PAMELA ANNE PETERSON** at Hick's Discount Beverage. The store manager, Mohammed Kamaluddin, advised he was familiar **PAMELA ANNE PETERSON** and had cashed checks for her at the store in the past. He noted that persons cashing checks at Hick's Discount Beverage must provide identification that is copied and maintained in their records, however due to these transactions being two to three years old no records were found that could be turned over for this investigation.

Your affiant interviewed [REDACTED], a Medicaid recipient and transportation services client of **PAMELA ANNE PETERSON**. [REDACTED] stated that they got rides from **PAMELA ANNE PETERSON** to get services at [REDACTED]. Those rides

started at [REDACTED] home and went to [REDACTED] once per week. **PAMELA ANNE PETERSON** drove [REDACTED] from home to the facility and then back home again after services were provided at [REDACTED]. [REDACTED] is capable of positively identifying **PAMELA ANNE PETERSON** as her driver once per week in 2017.

Your affiant attempted to interview **PAMELA ANNE PETERSON** as part of this investigation. She was located at [REDACTED], the address identified as her home address by the [REDACTED]. **PAMELA ANNE PETERSON** spoke by partially opening her front door and confirmed her identity but would not confirm or deny that she provided transportation services with Logisticare Solutions, LLC. She then abruptly ended the interview stating she no longer wanted to answer questions and shut the door.

According to Florida Medicaid records, provided by DXC, [REDACTED] is enrolled as an authorized Medicaid provider under Provider Number [REDACTED] effective October 25, 2009, as a Group Practice provider of [REDACTED].

Logisticare Solutions, LLC and [REDACTED] Medicaid claims data, obtained from DXC, for services provided to Medicaid recipient [REDACTED] were reviewed by your Affiant for procedure codes billed, units billed and amounts reimbursed. Between July 4, 2017 and December 1, 2018, the data showed a consistent pattern of claims submitted by, and reimbursed to, [REDACTED] one day per week that was in agreement with [REDACTED] statement that she regularly traveled there only once per week. However, during that same date range the data showed a pattern of claims submitted by, and reimbursed to, Logisticare Solutions, LLC for NET services seven days per week consistent with the Logisticare mileage trip logs derived by forms submitted where **PAMELA ANNE PETERSON** was the driver.

The Medicaid data also showed that prior to July 4, 2017 claims submitted by, and reimbursed to, Logisticare Solutions, LLC and [REDACTED] for services to [REDACTED] occurred one day per week on the same date consistent with the Logisticare mileage trip logs derived by forms submitted where drivers were not **PAMELA ANNE PETERSON**. It also showed that after December 1, 2018 claims submitted by, and reimbursed to, Logisticare Solutions, LLC and

going scheme, **PAMELA ANNE PETERSON** did benefit from willfully and intentionally defrauding the Florida Medicaid Program by her direct actions which created false billing information and/or progress notes used to obtain reimbursement from the Medicaid program.

WHEREFORE

your Affiant respectfully requests this Honorable Court to issue an arrest warrant for the arrest of **PAMELA ANNE PETERSON** for the offense of Medicaid Provider Fraud so that **PAMELA ANNE PETERSON** be made to answer to the charges.

FURTHER AFFIANT SAYETH NOT.

Affiant

Law Enforcement Investigator Robert Snetsinger

Sworn to and Subscribed before me, the undersigned authority, this ____ day of _____, 2020.

Law Enforcement Investigator