

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 11 CM 1292

SAMANTHA S. CONNAUGHTY
626 Meier Lane
Onalaska, WI 54650
DOB: 02/01/69

Defendant.

CRIMINAL COMPLAINT
FRAUDULENT INSURANCE CLAIMS

I, RICHARD A. BASILIERE, BEING DULY SWORN ON OATH UPON
INFORMATION AND BELIEF STATE THAT:

COUNT ONE

Beginning on or about January 1, 2009, and continuing until on or about July 30, 2009, in the city of Onalaska, La Crosse County, Wisconsin, defendant Samantha S. Connaughty did knowingly and willfully make or cause to be made false statements on applications for payment for hours she claimed to have worked as a nurse for a patient covered by the Medicaid Program, a public benefits insurance program, by representing that she had provided authorized services to Medicaid recipient Tiffany Lipke, contrary to Wis. Stat. § 943.395(1)(a) and (2)(a), a Class A misdemeanor.

The maximum penalty for this crime is imprisonment not to exceed nine months, or a fine not to exceed \$10,000, or both.

COUNT TWO

Beginning on or about August 1, 2009, and continuing until on or about December 31, 2009, in the city of Onalaska, La Crosse County, Wisconsin, defendant Samantha S. Connaughty did knowingly and willfully make or cause to be made false statements on applications for payment for hours she claimed to have worked as a nurse for a patient covered by the Medicaid Program, a public benefits insurance program, by representing that she had provided authorized services to Medicaid recipient Tiffany Lipke, contrary to Wis. Stat. § 943.395(1)(a) and (2)(a), a Class A misdemeanor.

The maximum penalty for this crime is imprisonment not to exceed nine months, or a fine not to exceed \$10,000, or both.

COUNT THREE

Beginning on or about January 1, 2010, and continuing until on or about November 15, 2010, in the city of Onalaska, La Crosse County, Wisconsin, defendant Samantha S. Connaughty did knowingly and willfully make or cause to be made false statements on applications for payment for hours she claimed to have worked as a nurse for a patient covered by the Medicaid Program, a public benefits insurance program, by representing that she had provided authorized services to Medicaid recipient Tiffany Lipke, contrary to Wis. Stat. § 943.395(1)(a) and (2)(a), a Class A misdemeanor.

The maximum penalty for this crime is imprisonment not to exceed nine months, or a fine not to exceed \$10,000, or both.

FACTUAL BASIS

Your complainant was assigned to review claims for payment submitted to the Wisconsin Medicaid Program by registered nurse Samantha S. Connaughty. Pursuant to this audit and investigation, your complainant has personally been in contact with, interviewed, and/or has

communicated with various adult citizen witnesses as described later herein whom he believes to be truthful and reliable.

Your complainant has spoken with and has reviewed written documentation provided to complainant by James Essaff, the Quality Assurance Manager for Hewlett Packard Enterprise Services (HP). HP is the financial intermediary that receives, processes and reimburses health care providers that utilize the State of Wisconsin's Medicaid Program for the delivery and reimbursement of services. The written documentation provided included provider application information and forms, and billing/payment records involving defendant Samantha S. Connaughty and Medicaid payments Connaughty received for providing services to Tiffany Lipke. Said records were maintained in the normal course of business.

Based on his review of the provider application materials supplied by HP and Essaff, your complainant knows that Samantha S. Connaughty, DOB: 02/01/1969, is a Registered Nurse, RN license #150809-30, and is certified as an independent nurse to deliver services under the Medicaid based "Nurses in Independent Practice" program. Connaughty was approved to be a Medicaid provider on April 2, 2008, and still holds a valid certification for delivering services under the Nurses in Independent Practice program. Since Connaughty delivers services within the homes of the recipients, HP considers her home address of 626 Meier Lane, Onalaska, Wisconsin 53650, as her business address and sends her Medicaid service provider reimbursement checks to that address.

Provider application materials shown to your complainant by HP and Essaff also indicated that defendant Connaughty submitted "Trading Partner Agreements" in which Connaughty agreed to transmit Wisconsin Medicaid claims for payment for services she provided to patients electronically through an authorized third party billing agent named Badgerland Billing, LLC.

Your complainant also personally interviewed Catherine Lipke, the mother and guardian of Medicaid recipient Tiffany Lipke. Lipke informed your complainant that defendant Samantha

Connaughty provided nursing services to her daughter under Medicaid's "Nurses in Independent Practice" program. Lipke stated that Connaughty did not provide services to Tiffany Lipke on several dates between August 2010 and November 2010 when defendant Connaughty submitted bills to Medicaid for said services. Lipke indicated that according to Tiffany's care records including calendars, medication administration records and nursing notes, Samantha Connaughty did not provide services to Tiffany as the Medicaid records indicate. Lipke further pointed out that according to her memory and her review of the nursing calendar, Connaughty last provided services to Tiffany Lipke at the end of September, 2010; however, Connaughty billed for providing services in November of 2010 when no such services were provided.

Your complainant further personally interviewed defendant Samantha Connaughty, who made statements against her penal interests. During your complainant's interviews, your complainant asked the defendant about her causing Medicaid bills to be submitted for services purportedly provided to Tiffany Lipke, when in fact no such services were provided. Connaughty admitted that she did not provide some services that were billed to Medicaid concerning Tiffany Lipke. Connaughty indicated that sometime in 2008, she became very sick with what was eventually diagnosed as lymphoma. Because she was too ill to work, but still needed the money to support herself and her children, she caused fraudulent claims to be submitted to Medicaid for services that she did not perform. She also stated that because she sometimes worked over 12 hours in a particular day, she billed those hours that she worked, over and above the 12 hours, on a different day. Connaughty stated that she was very good at drafting and maintaining nursing notes and stated that if she did not have a note for a service, then the service did not take place. Connaughty stated that she caused false claims to be submitted to Medicaid for services purportedly delivered to Medicaid recipient Tiffany Lipke, and admitted that she knew it was wrong to submit claims for services that she knew that she did not deliver.

Connaughty stated that all dates of service she actually delivered to Tiffany are supported by nursing notes. Connaughty then provided your complainant with a copy of all the nursing notes she created regarding Tiffany Lipke. Connaughty informed your complainant that any claims which are not supported by nursing notes were for services that Tiffany Lipke did not receive. With regards to the nursing notes that do support actual services to Tiffany Lipke, Connaughty stated she sometimes billed Medicaid for more hours than her notes justify. Again, Connaughty stated that she was billing for more hours than were indicated on the notes because she sought reimbursement for services that are not covered by Medicaid (providing over 12 hours of service). Connaughty also stated that she had no verification that she was performing any services over and above the hours indicated on the notes.

Based on your complainant's review of the Medicaid billing records, including the Wisconsin Medicaid remittance and status reports, along with the associated cancelled checks supplied to your complainant by James Essaff, and based upon nursing notes and medication administration records maintained by Catherine Lipke, nursing notes maintained by Samantha Connaughty, and the statements of Catherine Lipke and Samantha Connaughty, your complainant has concluded that the claims associated with the following dates of service were billed when no such services were performed:

Medicaid Recipient: Tiffany Lipke

Samantha Connaughty's care of Tiffany Lipke: 4/17/08 - 11/15/10

Date of Service	Hours Worked (Shown on Nursing Notes)	Time of Day Worked (Shown on Nursing Notes)	Copy of Notes Retained By:	Calendar	Logs	PDN Hours	Hrs Paid	Paid	Over-payments
1/1/2009	No nursing note		n/a	Not on Calendar	none	UF 6AM - Noon	6	\$196.14	\$196.14
1/3/2009	No nursing note		n/a	Sick	none	UF 6AM - Noon	12	\$392.28	\$392.28
1/4/2009	No nursing note		n/a	Not on Calendar	none	UF 6AM - Noon	8.5	\$277.87	\$277.87
1/9/2009	8.5 hrs	7:30AM-4PM	Sam/Lipke	7 to 4	none	UF 6AM - Noon	9	\$294.21	\$16.35
1/13/2009	No nursing note		n/a	Sick	none	UG 12PM-6PM	6	\$196.14	\$196.14

Date of Service	Hours Worked (Shown on Nursing Notes)	Time of Day Worked (Shown on Nursing Notes)	Copy of Notes Retained By:	Calendar	Logs	PDN Hours	Hrs Paid	Paid	Over-payments
1/20/2009	No nursing note		n/a	Sick	none	UG 12PM-6PM	6	\$196.14	\$196.14
1/21/2009	No nursing note		n/a	Sick	none	UF 6AM - Noon	12	\$392.28	\$392.28
1/22/2009	No nursing note		n/a	Sick	none	UJ 12AM-6AM	4	\$130.76	\$130.76
1/23/2009	No nursing note		n/a	Sick	none	UF 6AM - Noon	12	\$392.28	\$392.28
1/25/2009	5 hrs	4PM - 9PM	Sam only	4 to 9	none	UG 12PM-6PM	6	\$196.14	\$32.69
2/5/2009	No nursing note		n/a	Not on Calendar	No	UH 6PM-12AM	4	\$130.76	\$130.76
2/6/2009	9.5 hrs	8AM - 5:30PM	Sam/Lipke	crossed out	Yes	UF 6AM - Noon	12	\$392.28	\$81.72
2/12/2009	No nursing note		n/a	crossed out	No	UG 12PM-6PM	5	\$163.45	\$163.45
2/13/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	5	\$163.45	\$163.45
2/14/2009	10 hrs	8:30AM-6:30PM	Sam/Lipke	crossed out	Yes	UF 6AM - Noon	12	\$392.28	\$65.38
2/15/2009	No nursing note		n/a	crossed out	No	UF 6AM - Noon	12	\$392.28	\$392.28
2/21/2009	5.75 hrs	9:15AM-1 PM	Sam/Lipke	Not on Calendar	Yes	UF 6AM - Noon	7	\$228.83	\$106.24
2/22/2009	No nursing note		n/a	crossed out	No	UG 12PM-6PM	6	\$196.14	\$196.14
2/23/2009	6.5 hrs	2:30PM-9PM	Lipke only	crossed out	Yes	UF 6AM - Noon	12	\$392.28	\$179.79
2/26/2009	No nursing note		n/a	crossed out	No	UG 12PM-6PM	6	\$196.14	\$196.14
2/27/2009	8 hrs	8 AM - 4PM	Sam/Lipke	crossed out	Yes	UF 6AM - Noon	10	\$326.90	\$65.38
2/28/2009	No nursing note		n/a	crossed out	No	UF 6AM - Noon	8	\$261.52	\$261.52
3/1/2009	4 hrs	4 PM - 8 PM	Sam/Lipke	4 to 8	Yes	UG 12PM-6PM	6	\$196.14	\$65.38
3/5/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	6	\$196.14	\$196.14
3/6/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
3/7/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
3/8/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
3/31/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
4/4/2009	No nursing note		n/a	crossed out	No	UG 12PM-6PM	5	\$163.45	\$163.45
4/5/2009	No nursing note		n/a	9 to 5	No	UF 6AM - Noon	12	\$392.28	\$392.28
4/6/2009	No nursing note		n/a	4 to 10	No	UG 12PM-6PM	5	\$163.45	\$163.45
4/16/2009	No nursing note		n/a	crossed out	No	UG 12PM-6PM	8	\$261.52	\$261.52
4/19/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
4/20/2009	No nursing note		n/a	crossed out	No	UF 6AM - Noon	12	\$392.28	\$392.28
4/21/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	6	\$196.14	\$196.14
4/24/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	6	\$196.14	\$196.14
4/25/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	5	\$163.45	\$163.45
4/28/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	6	\$196.14	\$196.14

Date of Service	Hours Worked (Shown on Nursing Notes)	Time of Day Worked (Shown on Nursing Notes)	Copy of Notes Retained By:	Calendar	Logs	PDN Hours	Hrs Paid	Paid	Over-payments
5/2/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
5/4/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	5	\$163.45	\$163.45
5/5/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	5	\$163.45	\$163.45
5/8/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	8	\$261.52	\$261.52
5/9/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	7	\$130.76	\$130.76
5/11/2009	7.5 hrs	8AM - 4:30PM	Sam/Lipke	8 to 4:30	Yes	UF 6AM - Noon	8.5	\$277.87	\$32.69
5/18/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	9	\$294.21	\$294.21
5/20/2009	9.5 hrs	12:30PM-9PM	Sam/Lipke	10 to 9	Yes	UF 6AM - Noon	9.5	\$310.56	\$32.69
5/22/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	6	\$196.14	\$196.14
5/24/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
5/28/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	8	\$261.52	\$261.52
5/29/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	8	\$261.52	\$261.52
5/31/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	7	\$228.83	\$228.83
6/2/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	4	\$130.76	\$130.76
6/4/2009	5 hrs	4:30 - 9:30	Sam/Lipke	4:30 to 9:30	Yes	UG 12PM-6PM	6	\$196.14	\$32.69
6/8/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
6/10/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
6/14/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	6	\$196.14	\$196.14
6/17/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
6/22/2009	No nursing note		n/a	Not on Calendar	No	UH 6PM-12AM	5	\$163.45	\$163.45
6/23/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	5	\$163.45	\$163.45
6/24/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
6/25/2009	7 hrs	2PM-9PM	Sam/Lipke	unclear	Yes	UG 12PM-6PM	8	\$261.52	\$32.69
6/27/2009	No nursing note		n/a	whited out	No	UF 6AM - Noon	12	\$392.28	\$392.28
6/29/2009	No nursing note		n/a	crossed out	No	UF 6AM - Noon	12	\$392.28	\$392.28
7/18/2009	7 hrs	8AM - 3PM	Sam only	8 to 3	Yes	UF 6AM - Noon	9	\$294.21	\$65.38
7/26/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	7	\$228.83	\$228.83
7/29/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	5	\$163.45	\$163.45
7/30/2009	5 hrs	12PM - 5PM	Sam only	12 to 5	Yes	UG 12PM-6PM	11	\$359.59	\$196.14
8/1/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
8/2/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
8/3/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	9	\$294.21	\$294.21
8/9/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	9	\$294.21	\$294.21

Date of Service	Hours Worked (Shown on Nursing Notes)	Time of Day Worked (Shown on Nursing Notes)	Copy of Notes Retained By:	Calendar	Logs	PDN Hours	Hrs Paid	Paid	Over-payments
8/10/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	5	\$163.45	\$163.45
8/11/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	5	\$163.45	\$163.45
8/13/2009	8 hrs	9AM- 5PM	Sam/Lipke	8 to 5	Yes	UF 6AM - Noon	11	\$359.59	\$98.07
8/14/2009	11 hrs	6AM - 5 PM	Sam only	8 to 5	Yes	UF 6AM - Noon	12	\$392.28	\$32.69
8/20/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
8/24/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	8	\$261.52	\$261.52
8/31/2009	5 hrs	5PM - 9PM	Sam/Lipke	5 to 10	Yes	UG 12PM-6PM	4	\$163.45	\$32.69
9/3/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	11	\$359.59	\$359.59
9/5/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	11	\$326.90	\$326.90
9/6/2009	No nursing note		n/a	8 to 5	No	UF 6AM - Noon	12	\$392.28	\$392.28
9/9/2009	5.5 hrs	8AM - 1:30PM	Sam/Lipke	8 to 1:30	Yes	UF 6AM - Noon	9	\$294.21	\$114.42
9/10/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	8	\$261.52	\$261.52
9/12/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
9/19/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
9/20/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
9/21/2009	No nursing note		n/a	8 to 5	No	UF 6AM - Noon	7	\$228.83	\$228.83
9/23/2009	9 hrs	8AM to 5PM	Sam only	8 to 5	Yes	UF 6AM - Noon	11	\$359.59	\$65.38
9/30/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	11	\$359.59	\$359.59
10/1/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
10/2/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
10/3/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
10/5/2009	7 hrs	10AM-5PM	Sam only	10 to 5	Yes	UF 6AM - Noon	9	\$294.21	\$65.38
10/7/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	9	\$294.21	\$294.21
10/8/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	7	\$228.83	\$228.83
10/12/2009	6 hrs	11AM - 5PM	Sam/Lipke	8 to 5	Yes	UF 6AM - Noon	9	\$294.21	\$98.07
10/13/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	7	\$228.83	\$228.83
10/14/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	9	\$294.21	\$294.21
10/15/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	9	\$294.21	\$294.21
10/17/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	8	\$261.52	\$261.52
10/18/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	8	\$261.52	\$261.52
10/19/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	5	\$163.45	\$163.45
10/20/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	5	\$163.45	\$163.45
10/21/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28

Date of Service	Hours Worked (Shown on Nursing Notes)	Time of Day Worked (Shown on Nursing Notes)	Copy of Notes Retained By:	Calendar	Logs	PDN Hours	Hrs Paid	Paid	Over-payments
10/24/2009	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
10/31/2009	6 hrs	9AM-3PM	Sam/Lipke	9 to 3	Yes	UF 6AM - Noon	12	\$392.28	\$196.14
11/5/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
11/15/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
11/20/2009	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	6	\$196.14	\$196.14
11/25/2009	4 hrs	9AM - 1PM	Sam/Lipke	9 to 12:30	Yes	UG 12PM-6PM	5	\$163.45	\$32.69
11/29/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
12/6/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
12/13/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	8	\$261.52	\$261.52
12/16/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
12/17/2009	No nursing note		n/a	Sick	No	UG 12PM-6PM	5	\$163.45	\$163.45
12/23/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
12/30/2009	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
1/1/2010	No nursing note		n/a	Not on calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
1/2/2010	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
1/9/2010	No nursing note		n/a	Not on calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
1/15/2010	4 hrs	5PM - 9PM	Sam/Lipke	5 to 9	Yes	UG 12PM-6PM	5	\$163.45	\$32.69
1/15/2010	No nursing note		n/a	5 to 9	No	UF 6AM - Noon	6	\$196.14	\$196.14
1/23/2010	No nursing note		n/a	Sick	No	UF 6AM - Noon	6	\$196.14	\$196.14
2/5/2010	7 hrs	7:30AM-2:30PM	Sam/Lipke	7:30AM-2:30PM	Yes	UF 6AM - Noon	7.5	\$245.18	\$16.35
2/7/2010	No nursing note		n/a	Not on calendar	No	UJ 12AM-6AM	10	\$326.90	\$326.90
2/8/2010	8 hrs	7:30AM-3:30PM	Sam only	7:30-3:30	Yes	UF 6AM - Noon	9.5	\$310.56	\$49.04
3/26/2010	8 hrs	7:30AM-3:30PM	Sam/Lipke	7:30-3:30	Yes	UF 6AM - Noon	9	\$294.21	\$32.69
4/2/2010	8.5 hrs	9AM - 5:30PM	Sam/Lipke	9-5:30	Yes	UF 6AM - Noon	10	\$326.90	\$49.04
4/3/2010	9 hrs	8:30AM-5:30PM	Sam/Lipke	9-5:30	Yes	UF 6AM - Noon	10	\$326.90	\$32.69
4/16/2010	5.5 hrs	10AM-3:30PM	Sam only	inconclusive	No	UF 6AM - Noon	8	\$261.52	\$81.73
4/21/2010	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
4/24/2010	No nursing note		n/a	Not on calendar	No	UG 12PM-6PM	8	\$261.52	\$261.52
4/25/2010	No nursing note		n/a	Crossed out 1 to 10	No	UF 6AM - Noon	12	\$392.28	\$392.28
7/11/2010	No nursing note		n/a	Not on calendar	No	UF 6AM-Noon	12	\$392.28	\$392.28
7/12/2010	No nursing notes		n/a	Not on calendar	No	UF 6AM-Noon	12	\$392.28	\$392.28
7/14/2010	No nursing note		n/a	Not on calendar	No	UF 6AM-Noon	6	\$196.14	\$196.14
7/16/2010	5.5 hrs	8AM - 1:30PM	Sam/Lipke	8 - 1:30	Yes	UF 6AM-Noon	6	\$196.14	\$16.35

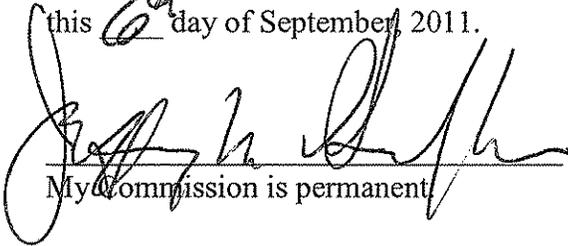
Date of Service	Hours Worked (Shown on Nursing Notes)	Time of Day Worked (Shown on Nursing Notes)	Copy of Notes Retained By:	Calendar	Logs	PDN Hours	Hrs Paid	Paid	Over-payments
7/23/2010	No nursing note		n/a	Not on calendar	No	UG 12PM-6PM	7	\$228.83	\$228.83
7/27/2010	No nursing note		n/a	Not on calendar	No	UF 6AM-Noon	6	\$196.14	\$196.14
7/30/2010	No nursing note		n/a	Not on calendar	No	UF 6AM-Noon	6	\$196.14	\$196.14
8/4/2010	5 hrs	8 AM - 1PM	Sam/Lipke	8 - 1	Yes	UF 6AM - Noon	6	\$196.14	\$32.69
8/5/2010	No nursing note		n/a	Not on calendar	No	UF 6AM - Noon	11	\$359.59	\$359.00
8/8/2010	No nursing note		n/a	Not on Calendar	No	UF 6AM-Noon	10	\$326.90	\$326.90
8/9/2010	No nursing note		n/a	Sick	No	UG 12PM-6PM	6	\$196.14	\$196.14
8/10/2010	No nursing note		n/a	Sick	No	UF 6AM - Noon	6	\$196.14	\$196.14
8/11/2010	No nursing note		n/a	Sick	No	UF 6AM - Noon	10	\$326.90	\$326.90
8/16/2010	No nursing note		n/a	Not on Calendar	No	UF 6AM - Noon	12	\$392.28	\$392.28
8/26/2010	No nursing note		n/a	Sick	No	UF 6AM - Noon	6	\$196.14	\$196.14
8/27/2010	No nursing note		n/a	Sick	No	UF 6AM - Noon	12	\$392.28	\$392.28
9/12/2010	No nursing notes		n/a	Not on Calendar	No	UF 6AM - Noon	10	\$326.90	\$326.90
9/15/2010	No nursing notes		n/a	Sick	No	UF 6AM - Noon	6	\$196.14	\$196.14
9/17/2010	8 hrs	8:30AM-4:30P	Sam/Lipke	9 - 4:30	Yes	UF 6AM - Noon	10	\$326.90	\$65.38
9/20/2010	No nursing note		n/a	Not on Calendar	No	UG 12PM-6PM	6	\$196.14	\$196.14
11/7/2010	No nursing notes		n/a	Not on calendar	No	UG 12PM-6PM	6	\$196.14	\$196.14
11/8/2010	No nursing notes		n/a	Not on calendar	No	UF 6AM-Noon	12	\$392.28	\$392.28
11/10/2010	No nursing notes		n/a	Not on calendar	No	UG 12PM-6PM	6	\$196.14	\$196.14
11/15/2010	No nursing notes		n/a	Not on calendar	No	UG 12PM-6PM	7	\$228.83	\$223.83
									\$37,890.32

Dated this 6th day of September, 2011.



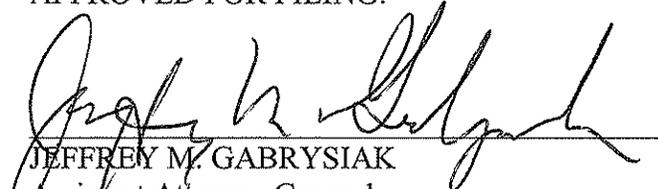
RICHARD A. BASILIERE
Auditor Senior
Medicaid Fraud Control and Elder Abuse Unit
Wisconsin Department of Justice

Subscribed and sworn to before me
this 20 day of September, 2011.



My Commission is permanent

APPROVED FOR FILING:



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