

1 TIMOTHY C. FOX
Attorney General
2 MICHAEL J. GEE
Assistant Attorney General
3 2225 11th Ave.
P.O. Box 201417
4 Helena, MT 59620-1417
Telephone: (406) 444-2026

FILED SEP 26 2019

SHIRLEY E. FAUST, CLERK
By *Shirley E. Faust*
Deputy

5 COUNSEL FOR THE STATE

6 MONTANA FOURTH JUDICIAL DISTRICT COURT
7 MISSOULA COUNTY

8 STATE OF MONTANA,)
9 Plaintiff,) Cause No. DC-19-567
10 v.) Dept. 4 Jason Markes
11 ANDREW LANCE BOHLMAN,) INFORMATION
12 Defendant.)

13
14 Michael J. Gee, Assistant Attorney General, as attorney for the State of
15 Montana, having first obtained leave of the Court as required by law, files this
16 Information accusing the Defendant, ANDREW LANCE BOHLMAN, of having
17 committed the felony offense of:

18 **Count I: MEDICAID FRAUD**, common scheme, a felony, committed
in violation of Mont. Code Ann. §§ 45-6-313(1)(a) (2015).

19 From on or about January 2012 to November 2016, in Missoula County,
20 State of Montana, the Defendant, ANDREW LANCE BOHLMAN, as a part of a
21 common scheme, obtained Medicaid payments or benefits for himself by purposely
22 or knowingly making, submitting, or authorizing the making or submitting of false
23 or misleading Medicaid claims, statements, representations, applications, or
24 documents to a Medicaid agency for services or items that the person is not entitled
25 to under applicable statutes or rules adopted under Title 2, chapter 4.

26 More particularly, the Defendant submitted claims to the Montana Medicaid
27 Program and/or ACS/Xerox Corporation for services and items related to the care of

1 multiple Medicaid patients approximately 1,700 times for services that did not occur
2 and/or were not supported by the legally-required patient records which support these
3 services and items.

4 The Defendant engaged in a series of acts or omissions motivated by a purpose
5 to accomplish a single criminal objective or by a common purpose or plan that
6 resulted in the repeated commission of the same offense (Medicaid Fraud) or that
7 affected the same person or the same persons (the Defendant and the Defendant's
8 Medicaid patients) or the property of the same person or persons (Medicaid
9 monies/payments.)

10 The payments, benefits, or claims for this offense exceed \$1,500 in value.

11 **Maximum Penalty for Medicaid Fraud, Common Scheme**

12 The maximum punishment provided by law for Medicaid Fraud, common
13 scheme, a felony, committed in violation of Mont. Code Ann. §§ 45-6-313(1)(a)
14 (2015) is:

15 A person convicted of the offense of Medicaid fraud involving payments,
16 benefits, or claims exceeding \$1,500 in value shall be fined an amount not to
17 exceed the greater of \$50,000 or 10 times the value of the payments obtained
18 or be imprisoned in the state prison for a term not to exceed 10 years, or both.

19 Dated this 25th day of September 2019.

20
21 
22 MICHAEL J. GEE
Assistant Attorney General.

23 Witnesses known to the State at the time of filing this Information are as
24 follows:

25 Agent Loren Mardis, Medicaid Fraud Control Unit – Helena, MT;
26 Auditor Cody Strietzel, MFCU – Helena, MT;
27 Jamie Smith, Blue Cross Blue Shield – Helena, MT;
Dr. Marc Nynas, Billings Family Chiropractic – Billings, MT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

- R.L. – Missoula, MT;
- C.T. – Condon, MT;
- U.C. – Seeley Lake, MT;
- T.C. – Seeley Lake, MT;
- A.T. – Seeley Lake, MT;
- L.T. – Seeley Lake, MT;
- A.M. – Seeley Lake, MT;
- R.R. – Seeley Lake, MT;
- K.R. – Seeley Lake, MT;
- M.C. – Great Falls, MT;
- T.W. – Seeley Lake, MT;
- J.M. – Seneca Falls, NY;
- P.G. – Missoula, MT;
- K.M. – Seeley Lake, MT;
- L.M. – Seeley Lake, MT;

Any witness identified in discovery.

*The names of the patients and the Patient's parents will be produced to the Defendant during discovery.