

1 compensation medical and/or temporary total disability (TTD) wage loss benefits
2 that he was not entitled to receive after he notified his former employer, Campbell's
3 Plumbing and Heating of Belgrade, Montana, of an alleged workplace injury. After
4 the claim was accepted by Montana State Fund, the Defendant feigned injury and/or
5 misrepresented symptoms to doctors and other medical professionals so that he
6 could continue receiving benefits. Over this same time span, Montana State Fund
7 paid approximately \$91,770.18 in medical benefits and \$40,937.78 in TTD wage-
8 loss benefits.

9 The Defendant engaged in a continuing course of conduct and in a series
10 of acts or omissions motivated by a purpose to accomplish a single criminal
11 objective or by a common purpose or plan that resulted in the repeated commission
12 of the same offense (Theft) or that affected the same person or the same persons
13 (State Fund) or the property of the same person or persons (State Fund
14 compensation/benefits).

15 A list of the possible witnesses for the State now known to the prosecution is
16 as follows (complete contact information will be provided with discovery):

- 17 1. Agent John Komora, Division of Criminal Investigation, 2225 11th Ave.,
18 Helena, MT 59601;
- 19 2. Investigator Shane Shaw, Montana State Fund, 855 Front Street, Helena,
MT 59604;
- 20 3. Michael Sanders, Claims Examiner, Montana State Fund, 855 Front
Street, Helena, MT 59604;
- 21 4. Kristy Wilson, Claims Examiner, Montana State Fund, 855 Front Street,
22 Helena, MT 59604;
- 23 5. Jill Larson, Customer Service Specialist, Montana State Fund, 855 Front
Street, Helena, MT 59604;
- 24 6. Peter Nolan, Private Investigator, Day & Associates, 23 South Last
Chance Gulch, Helena, MT 59624;
- 25 7. Marshall Investigative Group, Park Ridge, IL 60068;
- 26 8. Nikki Hill, Nurse Practitioner, Belgrade Urgent Care, 403 W. Main St.,
27 Belgrade, MT 59714;

- 1 9. Dr. Michael Ferrell, Bridger Orthopedic and Sports Medicine, 1450 Ellis
- 2 St., Bozeman, MT 59715;
- 3 10. Dr. Jean-Pierre Phancao, Bridger Orthopedic and Sports Medicine, 1450
- 4 Ellis St., Bozeman, MT 59715;
- 5 11. Dr. Heidi Tuthill, Advanced Medical Imaging, Bozeman, MT 59715;
- 6 12. Dr. Emily Reid, Community Physician Group, 2825 Fort Missoula Rd.,
- 7 Missoula, MT;
- 8 13. Michael Campbell, Campbell's Plumbing and Heating, Belgrade, Montana
- 9 58714;
- 10 14. Tonya Weir, Campbell's Plumbing and Heating, Belgrade, Montana
- 11 58714;
- 12 15. Will Morgan, Belgrade, MT 59714;
- 13 16. Stan Campbell, Belgrade, MT 59714;
- 14 17. Jeff Nehring, Helena, MT 59620;
- 15 18. Julia Caruana, Three Forks, MT 59752;
- 16 19. Marcus Wilcox, Central Plumbing and Heating, Belgrade, MT 59714;
- 17 20. Cody Marks, Clancy, MT 59634;
- 18 21. Colby Chapman, Billings, MT 59105;
- 19 22. Gary Marshall, Blackfoot Media Group;
- 20 23. Robin Murphy, ID;
- 21 24. Any other State Fund employee or contractor identified in discovery;
- 22 25. Any witness needed for chain of custody purposes; and
- 23 26. Any other medical provider, employee, or other witness identified in
- 24 discovery.
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Dated this 15th day of April, 2019.


CHRIS MCCONNELL
Assistant Attorney General