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6 SUPERIOR COURT OF WASHINGTON FOR THURSTON COUNTY

7 STATE OF WASHINGTON,

NO.

8 Plaintiff,

CERTIFICATION FOR
DETERMINATION OF PROBABLE
CAUSE

9 vs.

10 MICHAEL WRAYMAN MANN,
DOB: 12/11/1957

Defendant.

11 I, JEFFREY D. HARTLEY, am an Investigator with the Washington State Attorney
12 General's Office (AGO) Medicaid Fraud Control Unit (MFCU) and I am familiar with the
investigation conducted in this case.

13 The MFCU is a unit within the AGO; its specialized function is to investigate and
14 prosecute fraud committed by contracted Medicaid providers. Under various programs, Title
15 XIX (Medicaid) funds are used to provide medical services for eligible, qualifying clients. The
16 programs were formerly administered through the Washington State Department of Social and
17 Health Services (DSHS). Effective July 1, 2011, the Medicaid programs are now administered
under the Health Care Authority. Here forward DSHS and HCA are referred to as the
"Agency". Medicaid is a medical care program authorized under RCW 74.09 and is
administered through the Agency in Olympia, WA.

18 On September 12, 2012, I received a phone call from Ms. Erin Mayo, Durable Medical
19 Equipment (DME) Program Manager, for the Agency. Ms. Mayo reported one of her
20 technicians, Ms. Patricia (Trish) MacDougal, had been contacted by a Wheelchairs Plus
21 accountant. The accountant, Kent Collins, reported fraudulent billing practices were occurring
at Wheelchairs Plus, Inc. Ms. Mayo further described the facts as reported by Ms. MacDougal.

22 My subsequent investigation gives me reason to believe probable cause exists that
23 **Michael Wrayman Mann (MANN), DOB: December 11, 1957**, d/b/a Wheelchairs Plus,
24 committed the crimes of Theft in the First Degree (RCW 9A.56.020(1)(b) and
RCW 9A.56.030(1)(a), and Medicaid False Statement (RCW 74.09.230(1)) based upon the
following facts:

25 Prior to participating in the Medicaid program, each provider must first enter into a
26 Core Provider Agreement with the Agency. The Core Provider Agreement is the basic

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Mann, Michael
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1 contract between the Agency and an entity providing services to eligible clients. The core
2 provider agreement outlines and defines terms of participation in medical assistance programs.
3 As a basic part of a Core Provider Agreement, and specifically cited in the Core Provider
4 Agreement signed by MANN, the provider agrees they are "subject to and shall comply with
5 all federal laws and state laws, rules and regulations and all program policy provisions,
6 including department [Agency] numbered memorandum, billing instructions, and other
7 associated written department [Agency] issuances in effect at the time the service is rendered,
8 which are incorporated into the Agreement by the reference."

9 MANN, by his own admissions became an Agency provider in 1996 or 1997. However,
10 relevant to this certification, on October 8, 2002, the Agency's "Provider Relations" unit
11 received an Enrollment Application with an attached Core Provider Agreement signed by a
12 "Michael W. Mann President." The application and core provider agreement were dated
13 October 1, 2002. MANN used the same agreement from October 2002 through October 2012
14 while operating as a sole proprietorship under the name of Wheelchairs Plus, Inc. This
15 agreement states, in part:

16 **3. Billing and Payment. The Provider agrees:**

- 17 a. *To submit claims for services rendered to eligible clients, as identified*
18 *by the department, in accordance with rules and billing instructions in*
19 *effect at the time the service is rendered.*
20 b. ...
21 c. *To be held to all the terms of the Agreement even though third party*
22 *may be involved in billing claims to the department [Agency]...*

23 Further between October 1, 2002 and October 18, 2012, the Washington State
24 Medicaid Agency produced sets of instructions for Medicaid providers, such as MANN. The
25 instructions were called either Billing Instructions or Provider Guides. A set of these
26 instructions specifically covered Wheelchairs. These instructions were provided to Medicaid
27 providers as they were updated. Any changes to the program rules in between billing
28 instruction updates were addressed in numbered memorandums. In each one of these Billing
29 Instructions or Provider Guides there is a statement to the effect of "Furnish to"
30 [MAA/Department/Agency] "clients only new equipment that includes full manufacturer and
31 dealer warranties;" I have reviewed these instructions and spoken in depth with Agency
32 personnel about them. Durable Medical Equipment (DME) is equipment that can withstand
33 repeated use; is primarily and customarily used to serve a medical purpose; generally is not
34 useful to a person in the absence of illness or injury; and is appropriate for use in the client's
35 place of residence. The date of delivery is the date the client actually took physical possession
36 of an item or equipment; this is the date of service in which a payment is based. The agency
37 pays for DME and related supplies including modifications, accessories, and repairs when they
38 are: Covered within the scope of the client's medical program, medically necessary, as defined
39 in WAC 182-500-0005, prescribed by a physician, advanced registered nurse practitioner
40 (ARNP), or physician assistant certified (PAC) within the scope of his or her licensure,
41 authorized, as required in the Billing Instructions or Provider Guides.

1 The agency requires prior authorization (PA) for covered durable medical equipment
2 (DME), related supplies such as wheelchairs. The agency evaluates requests requiring PA on a
3 case-by-case basis to determine medical necessity and to determine if the services meet the
requirement as outlined in the Billing Instructions or Provider Guides.

4 My investigation found between December 2006 and October 2012, **MANN**, doing
5 business as Wheelchairs Plus, consummated a fraud scheme where he and/or his employees
6 (Collectively "**MANN**") would either purchase wheelchairs from private parties over the
7 internet from sites such as Craigslist.org, or acquire them from nursing homes, usually from an
8 area **MANN** referred to as the "bone closet." The term "bone closet" refers to the location
9 where nursing or other long-term care facilities store equipment such as used wheelchairs left
10 by patients who no longer need them, have died, received a new chair, etc. **MANN** would then
11 refurbish the chairs, sometimes repainting, and then affix new labels and serial numbers, which
he or his staff created or obtained from the manufacturer. **MANN** or his staff, under his
direction, would then deliver the chair to the Medicaid Client(s). **MANN** or his staff would
then submit a claim for payment to the Washington State Medicaid Agency. **MANN**
submitted, or had submitted these claims for payment knowing that the Washington State
Medicaid Agency only paid for new equipment.

12 I reviewed records maintained by the Washington State Department of Revenue (DOR)
13 and determined, according to the website, Wheelchairs Plus, Inc. DOR account was opened on
or about January 1, 2001 assigned Unified Business Identification (UBI) #602027947.

14 I reviewed records maintained by the Washington State Secretary of State (WASOS)
15 and determined, according to the website, that Wheelchairs Plus, Inc. was a for profit
16 corporation, with a filing date of December 15, 2000. The Registered Agent for the
17 corporation was Michael **MANN**, with an address of 8724 Fauntlee Crst SW, Seattle, WA
98136, which was **MANN**'s home address. The UBI # was listed as 602027947.

18 On October 18, 2012, pursuant to a Search Warrant issued by the Thurston County
19 Superior Court, a search was conducted of **MANN**'s business, Wheelchairs Plus, located in
20 Seattle, WA. The evidence seized consisted of client files, DSHS billing instructions, DSHS
21 remittance advice forms, bank records, employee files, employee instructions, computers,
22 wheelchairs, etc. At the time of my arrival both of the suite's garage bay doors were open. As
23 you looked towards the building, the ground in front of the garage door to the right was wet
24 and there was a wheelchair turned upward just outside and a pressure washer located just
inside of the door. The garage door to the right was about half way open and there was a work
bench covered by cardboard except about a 2ft x 2ft area with a fan running. I readily smelled
the odor of spray paint coming from that area as I approached the building. Behind the
cardboard near the work bench were various wheelchair parts with wet paint.

25 During the execution of the search warrant **MANN** was interviewed by myself and
26 Senior Investigator Larry Carlier. **MANN** subsequently admitted Wheelchairs Plus had been
purchasing or obtaining for free previously used wheelchairs, reconditioning the chairs and

1 then selling the chairs to Washington State Medicaid clients, via Washington State's Medicaid
2 Agency, as new.

3 **MANN** expressed he was aware of the rules regarding the selling of used equipment.

4 *MR. HARTLEY: what other rules are there?*

5 *MR. CARLIER: Do they normally buy used chairs?*

6 *MR. MANN: No they don't.*

7 *MR. HARTLEY: Okay. So is it - is it your understanding the product has to be new?*

8 *MR. MANN: Yes.*

9 *MR. HARTLEY: Okay.*

10 *MR. CARLIER: Okay.*

11 *MR. HARTLEY: What is your understanding if you give somebody a trial chair, a
12 loaner have you - urn and then there's - uh - a need for a replacement? What is your
13 understanding then this - can you give them a loaner and turn it into a used - a new
14 chair? Or must you replace it with a new chair?*

15 *MR. MANN: Uh - Normally we replaced it with a new chair*

16 *MR. HARTLEY: But..., what is your understanding of the rules is?*

17 *MR. MANN: That - uh - the trial chair couldn't stay, you know, couldn't stay used by
18 the resident that we needed to or the Medicaid client and that it needed to be replaced
19 at the time of approval of the claim.*

20 **MANN** explained where the used wheelchairs came from, how the chairs were
21 reconditioned, and the steps undertaken to conceal his business's actions, such as affixing
22 fraudulent serial numbers to the chairs. **MANN** expressed he had been doing this for the
23 previous two and one half to three years.

24 *MR. CARLIER: So when did the - the reconditioning thing start?*

25 *MR. MANN: That was probably I'm going to say two-and-a-half years ago. And that's
26 best guess it's not like I'm trying to hide something but - urn -*

27 **MANN** explained the process of purchasing wheelchairs from Craigslist started when
28 Wheelchairs Plus would purchase a "trial" wheelchair (a trial wheelchair, similar in make and
29 model to a chair identified that to meet the patient's needs, used in decision making). Once the
30 chair was under the client it would meet the client's needs, so they would leave the chair with
31 them.

32 *"MR. MANN: -- urn - wheelchair cause it's pretty - detailed, you know, information.
33 And then we've got - we had a - uh - wheelchair from - uh -- Craigslist that we had
34 gotten for the trial wheelchair okay. And then, you know, the trial wheelchair would be
35 a chair - what would happen we would just leave the chair - start leaving the chair
36 underneath 'em."*

37 During the interview **MANN** was asked why Wheelchairs Plus created fictitious serial
38 numbers for used wheelchairs.

1 MR. CARLIER: Why would you change the serial numbers?

2 MR. MANN: Uh -

3 MR. CARLIER: It's obvious but I'm -

4 MR. MANN: Yeah.

5 MR. CARLIER: -- why would you change the serial numbers?

6 MR. MANN: Uh - Because the chair was, you know, supposed - well yeah chair was supposed to be new and it's -

7 MR. CARLIER: What about stickers?

8 MR. MANN: Urn -- Yeah we made the stickers.

9 MR. CARLIER: The - and the serial number stickers right?

10 MR. MANN: Uh - Yes we made the sticker that, you know, indicated the model of chair.

11 MR. CARLIER: You made those?

12 MR. MANN: Yes.

13 MR. CARLIER: Okay. Um - How would you make 'em?

14 MR. MANN: Um - Well would have it scanned in, you know -

15 Regarding how serial numbers were selected, MANN stated.

16 MR. CARLIER: Would you look for one [serial number] that was out of state or -

17 MR. MANN: Yeah.

18 MR. CARLIER: And why would you do that?

19 MR. MANN: Um -- So the number that the state had, that I would call in, wouldn't be the same number of an individual that - um - a wheelchair would -

20 MR. CARLIER: And that was your decision to do that?

21 MR. MANN: Yes.

22 Between September 19, 2012 and October 30, 2013, myself or other investigators from my office interviewed individuals who were either working for MANN at the time of their interview or had previously worked for MANN, two of which as earlier as March and April 2008. All the employees interviewed, except one who had been with WCP for five days, acknowledged that WCP collected used wheelchairs, refurbished the wheelchairs and then billed the Agency as if they were new. All the Employees, except one who had been with WCP for five days, acknowledged that MANN was approved and was actively involved in the process.

23 On September 19, 2012, I interviewed of Mr. Shaun Garrison, a sales person for WCP. Mr. Garrison began working for WCP in July 2010. His job duties included visiting nursing homes and obtaining evaluations from Physical Therapists. Mr. Garrison said when he first began working MANN instructed him to ask therapists at the nursing facilities if they had any old chairs to give them and go through their "bone yards." Mr. Garrison said after six months of being pressured by MANN to check the bone yards for chairs and parts that he began doing it, just to get MANN off his back. MANN would tell him to get anything he could, such as chairs, backs, and leg rests.

1 Mr. Garrison admitted he has picked up parts from the different facilities, taken them
2 back to the office, and turned them over to MANN. Mr. Garrison estimated he picked up
between 40 and 50 chairs from the different facilities.

3 Mr. Garrison stated all of the chairs and parts were returned to the office for
4 refurbishing. Mr. Garrison estimated about half of the chairs he obtained from the nursing
5 facilities went back out as new chairs. He further estimated about 75% of MANN's business
consisted of reselling used chairs.

6 Mr. Garrison admitted he had picked up chairs which were purchased from Craigslist
and return them to the business. He estimated MANN paid approximately \$600 per used chair.

7 On September 12, 2012, I made initial telephonic contact with Mr. Kent Collins, and
8 accountant and office assistant with WCP. I briefly confirmed Mr. Collins was an employee of
9 WCP and the company serviced Medicaid clients. According to Mr. Collins, Medicaid
comprised 99% of WCP's business.

10 On September 19, 2012, I interviewed Mr. Collins regarding his allegations. Mr.
11 Collins alleged MANN, the owner and operator of WCP, had been instructing his employees to
12 purchase used wheelchairs from Craigslist throughout the greater Seattle area or collect them
for free from skilled nursing facilities. MANN would then refurbish the chairs and sell them to
DSHS Medicaid clients as new.

13 On September 19, 2012, I interviewed Ms. Ruby King who began working for MANN
14 on July 17, 2009. Ms. King was the WCP office manager, coming to work for MANN after he
ran an ad, which she responded to. MANN told Ms. King that he was getting rid of his entire
15 staff, as he believed they were stealing from him. Specifically MANN stated he thought
Ms. Jan McTaggart, his previous office manager, had stolen \$300,000 from his company.

16 Ms. King confirmed MANN, after purchasing the used wheelchairs, was refurbishing
and putting new serial numbers on them. Ms. King identified that when she was hired she had
17 no experience with wheelchairs or the DME business. However, Ms. King felt she was able to
18 learn the business in about six months, learning everything she knew from MANN. Ms. King
even stated MANN had written instructions on how to choose a wheelchair serial number to
19 use.

20 On October 18, 2012, Investigator Carlier and I interviewed Mr. Robert Aspiras, a
WCP employee. Mr. Aspiras stated he had known MANN for approximately 20 years, but had
21 only been working for MANN for the previous 10 weeks. Mr. Aspiras said he and others
knew the business was purchasing used wheelchairs, reconditioning them and selling them as
new. Mr. Aspiras knew what was going on was not right, but he needed employment.
22 Mr. Aspiras said MANN was also aware of what was going on, when MANN gave
Mr. Aspiras a tour of the shop they went to the reconditioning area and MANN said "this is
23 where we make our money." Mr. Aspiras said he picked up wheelchairs from nursing homes
he visited and once even picked up a wheelchair purchased from Craigslist. MANN negotiated
24 the price and gave Mr. Aspiras a debit card to get money out of an ATM.

25 On October 18, 2012, Investigators Mariya Kunin and Tim Scott interviewed
26 Mr. Jeffrey Neubert. Mr. Neubert stated he had only worked at Wheelchairs Plus for several
months. Mr. Neubert explained his job at Wheelchairs Plus was to primarily assemble used

1 wheelchairs. Mr. Neubert stated "every once in a while" they would get to assemble a new
2 wheelchair and the process was much quicker than a used wheelchair assembly. When asked
3 who provided him instruction Neubert replied "Um - when I started - um- the owner,
4 Michael" [MANN].

5 On October 18, 2012, Investigators Kunin and Scott interviewed Mr. Ronald Howard.
6 Mr. Howard stated he had worked for WCP for a couple years. Mr. Howard stated he was not
7 responsible for obtaining wheelchairs' serial numbers, making serial number stickers or
8 placing them on the wheelchairs. Mr. Howard stated he was responsible for refurbishing the
9 wheelchairs and described the process. Mr. stated when he first started to work for WCP it
10 was MANN who instructed him on how to refurbish wheelchairs; "he told me that I need this
11 one redone, stripped and painted and redone."

12 October 18, 2012, Investigators Kunin and Scott interviewed Mr. James Hand.
13 Mr. Hand stated he had worked for Wheelchairs Plus for five days. Mr. Hand did not know
14 where any of the wheelchair parts came from or where they went after they were assembled.

15 On September 24, 2013, at 3:19 PM, Investigators Jackie Franklin and Ken Harkcom
16 interview Mr. Peterson Conanan. Mr. Conanan worked for MANN at Wheelchairs Plus for
17 approximately a year to a year and a half. Mr. Conanan said he worked in the back warehouse
18 where the wheelchairs were built. Mr. Conanan explained he stripped, pressure washed,
19 painted, and rebuilt wheelchairs on a daily basis. Mr. Conanan said MANN and sometimes
20 Ms. King inspected the wheelchairs after he was done with them.

21 On occasion MANN had him make deliveries of wheelchairs, but MANN always went
22 with him and MANN was the one who spoke to the client. MANN had Mr. Conanan pick up
23 wheelchairs that MANN had found on Craigslist. Mr. Conanan would receive cash from
24 MANN to purchase the Craigslist wheelchairs. According to Conanan, MANN only
25 purchased wheelchairs from Craigslist; MANN did not sell them on the website. Mr. Conanan
26 said for every 10 wheelchairs that were built for customers, only one was new.

On September 24, 2013, Investigators Franklin and Harkcom interviewed Ms. Brenda
Vega. Ms. Vega said she had answered an advertisement posted on Craigslist for a job with
WCP. According to Ms. Vega, she only worked for WCP for a couple of weeks, but she was
hired to replace Mr. Collins as the biller. Ms. Vega said MANN went on vacation after she
was hired and all Ms. Ruby King had her do was answer the phone.

Ms. Vega said it was clear to her Ms. King did not want Mr. Collins to leave and
Ms. King was not going to let her replace him. Ms. Vega indicated when MANN returned
from vacation he was surprised to see Mr. Collins still in the office. After MANN had a
meeting with Ms. King and Mr. Collins in his office she was let go. Ms. Vega acknowledged
that during the short time she worked at WCP she did learn that they sold both new and used
wheelchairs.

On September 30, 2013, Investigator Harkcom called and spoke with Mr. Bryon
McQuaid. Mr. McQuaid agreed to speak with Investigator Harkcom but did not want to be
recorded. Mr. McQuaid said he worked at WCP for approximately three weeks, but did not
like working there. Mr. McQuaid said he re-purposed and built chairs to the specifications
given to him by Mr. Howard. Mr. McQuaid indicated he had worked for Care Medical
previously, so the assembly of manual wheelchairs was not hard.

1 On October 2, 2013, Investigator Harkcom received a call from Mr. McQuaid who
2 advised he had some additional information to provide. According to Mr. McQuaid, he
3 worked for MANN longer than three weeks. He explained MANN paid him "under the table"
4 for a few weeks and MANN told Mr. McQuaid to call him if anyone asks Mr. McQuaid about
5 how the WCP operation worked. MANN told him if he didn't, then MANN would turn
6 Mr. McQuaid in for evading taxes. Mr. McQuaid said MANN personally checked every
7 wheelchair and had stated "Nothing leaves without my approval."

8 On October 22, 2013, Investigators Franklin and Harkcom interviewed Ms. Alexis
9 Kuehn. Ms. Kuehn said she worked for MANN from March to November of 2008. According
10 to Kuehn, she had met MANN while she worked as a Rehabilitation Technician at the Ballard
11 Care and Rehab Center. According to Kuehn, about 25% of the wheelchairs sold by
12 Wheelchairs Plus were used, but MANN would present everything as new. She gave the
13 example of taking parts from used wheelchairs and putting them in bins that contained both
14 new and used parts. Ms. Kuehn remembered cleaning up ROHO cushions, from used chairs,
15 and putting them back on the shelf where they would be used again.

16 On October 30, 2013, Investigators Franklin and Harkcom interviewed former WCP
17 employee, Mr. Bobby Hines. Mr. Hines said he worked for WCP for a couple of months
18 starting in April 2008. Mr. Hines learned of Wheelchairs Plus when a temp agency referred
19 him to MANN. According to Mr. Hines, he was hired to build and deliver wheelchairs.
20 Mr. Hines explained MANN had a particular way he wanted the wheelchairs built so he
21 showed Mr. Hines what he wanted. MANN would randomly spot check the completed
22 wheelchairs for quality. Mr. Hines said less than 1% of the wheelchairs were used. He
23 described the wheelchairs he worked on were new and had to be removed from the box.
24 According to Mr. Hines, MANN had started collecting used wheelchairs from some facilities,
25 but did not know if WCP had removed anything off the old wheelchairs. He did remember
26 occasionally he would have to paint parts after doing a repair on a wheelchair.

On October 18, 2012, during the interview of MANN, I obtained a records release from
MANN to obtain records from Sunrise Medical, Invacare Corporation, PDG Technologies, and
Pride Mobility. Based on these releases I requested copies of all records regarding any
wheelchairs or wheelchair parts or related items which were shipped to Wheelchairs Plus from
these four manufactures. The agency was able to provide a list of serial numbers, from their
electronic system, which was used to record serial numbers called in by WPC employee. The
serial number called in was allegedly the manufacturer's serial number, affixed to the
wheelchair and was called in as part of acknowledgement of delivery (date of service) which
also triggered a payment to be made to MANN.

Over several months I compared the serial numbers for chairs which the manufacturer's
said they sent to WCP with the list provided by the Agency. After removing serial numbers
from the Agency's list, which matched those provided by the manufacturers, I was left with
serial numbers for which I did not have a manufacturer invoice or was a serial number used
more than one time. I then went back to the manufacturers and did further research of the
remaining serial numbers.

1 I found wheelchairs which, according to the manufacturer's invoice(s), were sent to a
2 vendor other than Wheelchairs Plus or that wheelchairs serial numbers the manufacturer said
3 were not proper or did not exist, according to their records.

4 In incidents where MANN, doing business as Wheelchairs Plus, received or purchased
5 from a legitimate source and, according to the records, sold to the State Medicaid agency at
6 least two times; the second and subsequent claims were identified as potential wrongful acts.

7 **Theft in the First Degree:**

8 In reviewing the records obtained during the search of the Wheelchairs Plus business
9 office, obtained from the Washington State Medicaid Agency, or collected from different
10 wheelchair manufacturers, the following schemes were identified:

- 11 ➤ Scheme I: Wheelchairs marked with serial numbers the manufacturer said were not
12 proper or did not exist, according to their records.
- 13 ➤ Scheme II: Wheelchairs which MANN, doing business as Wheelchairs Plus, received
14 or purchased from a legitimate source and, according to the records, sold to the State
15 Medicaid agency at least two times; the second and subsequent claims were identified
16 as potential wrongful acts.
- 17 ➤ Scheme III: Wheelchairs which, according to the manufacturer's invoice(s), were sent
18 to a vendor other than Wheelchairs Plus.

19 All schemes I identified were supported with evidence found or provided by the
20 Washington State Medicaid agency and/or the wheelchair manufacturer and evidence seized
21 from the Wheelchairs Plus business office. All evidence identified supported the commission
22 of a potential wrongful act.

23 My investigation found between July 28, 2009 and October 12, 2012, there were 119
24 individual completed claims (incidents) where MANN, doing business as Wheelchairs Plus, in
25 Washington State, or his staff, submitted fraudulent claims and was paid which were used and
26 presented to the Agency as new. The claims were made to the Agency, who resided in
Thurston County, WA and payment was made by the Agency or the Agency's representative,
the Washington State Treasurer's Office, also located in Thurston County, WA.

The total payment made to MANN, as a result of MANN's actions to the Agency, was
\$606,980.00.

Medicaid False Statement:

My investigation established each of the above cited 119 incidents of theft was
predicated on a Medicaid False Statement, in that on 119 occasions where MANN, doing
business as Wheelchairs Plus, in Washington State, or his staff contacted the Agency and

1 reported the delivery and a reported serial number that was either falsified or had been
2 previously used or delivered for payment on behalf of a previous Medicaid Client. The
3 following 9 incidents represent examples of those false statements. This information was
4 obtained from WCP's own records and Agency payment records.

- 5 1) On or about March 31, 2009, a WCP employee assessed Medicaid client I.A., a
6 91 year-old Medicaid client suffering from Alzheimer's, for a wheelchair. On May
7 5, 2009, **MANN** "OK'd" the paperwork to be submitted. On May 14, 2009, a WCP
8 employee submitted a request for authorization, to the Agency, for a PDG Bentley
9 Manual wheelchair and accessories. On July 6, 2009, the Agency approved the
10 purchase of a wheelchair. On August 3, 2009, a WCP employee reported, to the
11 Agency, that a Bentley Manual wheelchair, serial number 19954, was delivered
12 (date of service) to Medicaid client I.A. on July 29, 2009. The evidence of delivery,
the delivery receipt, was dated April 16, 2009. On August 4, 2009, WCP billed the
Agency for the wheelchair. In addition, according to PDC, the manufacturer of the
wheelchair, a Bentley Manual wheelchair, Serial Number 19954 was shipped to
WCP on or about May 17, 2009. That wheelchair, according to WCP records, was
used as a rental wheelchair for Ballard Care and Rehab patient from December 3,
2007 through approximately May 2, 2008. The Agency paid **MANN** \$4,754.96 for
this wheelchair and accessories.
- 13 2) On or about September 14, 2011, a WCP employee assessed Medicaid client R.A.,
14 a 61 year-old Medicaid client suffering from Paraplegia, for a wheelchair. On
15 October 3, 2011, a WCP employee submitted paperwork to **MANN** to check and
16 approve. On October 3, 2011, **MANN** "OK'd" the paperwork. On October 14,
2011, a WCP employee submitted a request for authorization, to the Agency, for a
17 Solara 3G Manual wheelchair and accessories. On November 14, 2011, the Agency
18 approved the purchase of a wheelchair. On December 1, 2011, a WCP employee
19 reported to the Agency that a Solara 3G wheelchair, Serial Number 11DE004677,
20 was delivered (date of service) to Medicaid client R.A. on November 28, 2011. The
21 evidence of delivery, the delivery receipt, was dated January 4, 2012. On
22 December 13, 2011, WCP billed the Agency for the wheelchair. Although WCP
reported delivering Medicaid client R.A. a Solara 3G wheelchair, serial number
11DDE004677, the wheelchair's manufacturer, Invacare, provided a copy of an
invoice showing a Solara 3G wheelchair, with that serial number, was shipped on or
about May 2, 2011, to a customer whose address was in Indianapolis, IN. The
Agency paid **MANN** \$5,202.05 for this wheelchair and accessories.
- 23 3) On or about July 12, 2011, a WCP employee assessed Medicaid client E.B., an
24 81 year-old Medicaid client suffering from a Cerebrovascular Accident (CVA), for
25 a wheelchair. On August 25, 2011, a WCP employee submitted paperwork to
26 **MANN** to check and approve. On August 25, 2011, **MANN** "OK'd" the
paperwork. On September 6, 2011, a WCP employee submitted a request for
authorization, to the Agency, for a Solara 3G Manual wheelchair and accessories.

1 On October 6, 2011, the Agency approved the purchase of a wheelchair. On
2 October 18, 2011, a WCP employee reported to the Agency that a Solara 3G
3 wheelchair, Serial Number 11HE003126, was delivered (date of service) to
4 Medicaid client E.B. on October 14, 2011. A WCP file note, dated 10/18/2011,
5 reads "SG [Shaun Garrison] to deliver 10/20." The evidence of delivery, the
6 delivery receipt, was dated October 20, 2011. On October 20, 2011, WCP billed
7 the Agency for the wheelchair. Although WCP reported delivering Medicaid client
8 E.B. a Solara 3G wheelchair, serial number 11HE003126, the wheelchair's
9 manufacture, Invacare, provided a copy of an invoice showing a Solara 3G
10 wheelchair, with that serial number, was shipped on or about August 23, 2011, to a
11 customer whose address was in Cheektowaga, NY. The Agency paid MANN
12 \$4,845.97 for this wheelchair and accessories.

13 4) On or about March 21, 2011, a WCP employee assessed Medicaid client V.B., a
14 65 year-old Medicaid client suffering from Multiple Sclerosis, for a wheelchair. On
15 May 23, 2011, a WCP employee submitted paperwork to MANN to check and
16 approve. On May 23, 2011, MANN "OK'd" the paperwork. On May 23, 2011,
17 WCP submitted a request for authorization, to the Agency, for a Sunrise Medical
18 Quickie Iris 2 wheelchair and accessories. On May 24, 2011, a check of the
19 Agency database, for the submittal, showed "No Record" so the request for
20 authorization was resubmitted. On June 6, 2011, the request for authorization was
21 approved by the Agency. On June 7, 2011, there is a note in the WCP file which
22 reads "Use Serial # IRSE-001458." On June 9, 2011, a WCP employee reported to
23 the Agency that a Sunrise Medical Quickie Iris 2 wheelchair, Serial Number IRSE-
24 001458, was delivered (date of service) to Medicaid client V.B. on June 9, 2011.
25 On June 10, 2011, WCP billed the Agency for the wheelchair. A WCP file note,
26 dated June 20, 2011, reads "Pd [paid] in full." Under that note, there is another note
which reads "Not Delivered". There is no record of WCP returning the money. In
addition, according to Sunrise, the manufacturer of the wheelchair, a Quickie Iris 2
wheelchair, serial number IRSE-001458 was shipped to WCP on or about
February 13, 2009. That wheelchair, according to WCP records, was delivered to
client D.T. on or about March 15, 2010. The Agency paid MANN \$5,513.93 for
this wheelchair and accessories.

5) On or about June 19, 2012, a WCP employee assessed Medicaid client J.B., an
88 year-old Medicaid client suffering from a Cerebrovascular Accident (CVA), for
a wheelchair. On June 20, 2012, a WCP employee submitted paperwork to MANN
to check and approve. On June 20, 2012, MANN "OK'd" the paperwork. On
June 28, 2012, a WCP employee submitted a request for authorization to the
Agency to purchase a Sunrise Medical Quickie Iris 2 wheelchair and accessories.
On August 8, 2012, the Agency approved the purchase of a wheelchair. On
August 16, 2012, a WCP employee reported to the Agency that a Sunrise Medical
Quickie Iris 2 wheelchair, serial number IRSE-020723, was delivered (date of
service) to Medicaid client J.B. on August 13, 2012. On August 21, 2012, WCP

1 billed the Agency for the wheelchair. Although WCP reported delivering Medicaid
2 client J.B. a Quickie Iris 2 wheelchair, serial number IRSE-020723, the
3 wheelchair's manufacturer, Sunrise Medical, provided a copy of an invoice
4 showing a Quickie Iris 2 wheelchair with that serial number was shipped on or
about May 22, 2013, to a customer whose address was in Sunnyvale, CA. The
Agency paid MANN \$4,878.65 for this wheelchair and accessories.

5 6) On or about September 19, 2011, a WCP employee assessed Medicaid client E.C., a
6 90 year old Medicaid client suffering from Rheumatoid Arthritis, for a wheelchair.
7 On September 29, 2011, MANN "OK'd" the paperwork to be submitted. On
8 October 6, 2011, a WCP employee submitted a request for authorization to the
9 Agency for a Solara 3G Manual wheelchair and accessories. On or about
10 October 7, 2011, the Agency denied WCP's request as WCP had submitted a wrong
11 code. On October 7, 2011, the request was resubmitted. On November 16, 2011,
12 the Agency approved the purchase of a wheelchair. On December 1, 2011, a WCP
13 employee reported to the Agency that a Solara 3G wheelchair, serial number
14 11DE004869, was delivered (date of service) to Medicaid client E.C. on
November 28, 2011. There was no evidence of delivery, a delivery receipt located
in the WCP file. On December 6, 2011, WCP billed the Agency for the wheelchair.
Although WCP reported delivering Medicaid client E.C. a Solara 3G wheelchair,
serial number 11DDE004869, the wheelchair's manufacturer, Invacare, provided a
copy of an invoice showing a Solara 3G wheelchair with that serial number was
shipped on or about May 3, 2011, to a customer whose address was in San Antonio,
TX. The Agency paid MANN \$4,669.77 for this wheelchair and accessories.

15 7) On or about July 28, 2011, a WCP employee assessed Medicaid client F.C., a
16 91 year-old Medicaid client suffering from Macular Degeneration for a wheelchair.
17 On August 31, 2011, a WCP employee submitted paperwork to MANN to check
18 and approve. On September 1, 2011, MANN "OK'd" the paperwork to be
19 submitted. On September 1, 2011, a WCP employee submitted a request for
20 authorization to the Agency for an Invacare 9000XT wheelchair and accessories.
21 On September 30, 2011, the Agency approved the purchase of a wheelchair. On
22 October 6, 2011, a WCP employee reported, to the Agency, that an Invacare
23 9000XT wheelchair, serial number 11JM026288, was delivered (date of service) to
24 Medicaid client F.C. on October 4, 2011. The evidence of delivery, the delivery
25 receipt, was dated November 1, 2011. On October 26, 2011, WCP billed the
26 Agency for the wheelchair. Although WCP reported delivering Medicaid client
F.C. an Invacare 9000XT wheelchair, Serial Number 11JM026288, the
wheelchair's manufacturer, Invacare, provided a copy of an invoice showing a
Tracer EX2 wheelchair, with that serial number, was shipped on or about October
28, 2011, to a customer whose address was in Parsons, TN. The Agency paid
MANN \$3,042.72 for this wheelchair and accessories.

- 1 8) On or about February 9, 2011, a WCP employee assessed Medicaid client J.C., a
2 73 year-old Medicaid client suffering from Senile Dementia for a wheelchair. On
3 February 15, 2012, a WCP employee submitted paperwork to MANN to check and
4 approve. On February 15, 2012, MANN "OK'd" the paperwork to be submitted.
5 On February 20, 2012, a WCP employee submitted a request for authorization to
6 the Agency for a PDG Fuze T-20 tilt-in-space wheelchair and accessories. On
7 March 22, 2012, the Agency approved the purchase of a wheelchair. On March 26,
8 2012, a WCP employee reported to the Agency that a PDG Fuze T-20 tilt-in-space
9 wheelchair, serial number 49851, was delivered (date of service) to Medicaid client
10 J.C. on March 23, 2012. There was no evidence of delivery, a delivery receipt
11 located in the WCP file. On March 27, 2011, WCP billed the Agency for the
12 wheelchair. Although WCP reported delivering Medicaid client J.C. a PDG Fuze
13 T-20 tilt-in-space wheelchair, Serial Number 49851, the wheelchair's manufacturer,
14 Product Development Group (PDG), provided a copy of an invoice showing a PDG
15 Fuze T-20 tilt-in-space wheelchair, with that serial number, was shipped on or
16 about November 16, 2011, to a customer whose address was in Norfolk, NE. The
17 Agency paid MANN \$4,034.25 for this wheelchair and accessories.
- 18 9) On or about March 23, 2012, a WCP employee assessed Medicaid client H.D., a
19 79 year-old Medicaid client suffering from Coronary Artery Disease (CAD), for a
20 wheelchair. On March 26, 2012, a WCP employee submitted paperwork to MANN
21 to check and approve. On March 26, 2012, MANN "OK'd" the paperwork to be
22 submitted. On April 2, 2012, a WCP employee submitted a request for
23 authorization to the Agency for a PDG Bentley Manual wheelchair and accessories.
24 On May 17, 2012, the request for authorization was denied as the Medicaid client's
25 provider had not provided enough information in a timely fashion. On June 20,
26 2012, a WCP employee resubmitted a request for authorization to the Agency for a
PDG Bentley Manual wheelchair and accessories. On June 26, 2012, the Agency
approved the purchase of a wheelchair. On June 28, 2012, a WCP employee
reported to the Agency that a PDG Bentley Manual wheelchair, Serial Number
49445, was delivered (date of service) to Medicaid client H.D. on June 28, 2012.
The evidence of delivery, the delivery receipt, was dated July 2, 2012. On June 29,
2012, WCP billed the Agency for the wheelchair. Although WCP reported
delivering Medicaid client H.D. a Bentley Manual wheelchair, serial number 49445,
the wheelchair's manufacturer, Product Development Group (PDG), provided a
copy of an invoice showing a PDG Fuze T-50 tilt-in-space wheelchair, with that
serial number, was shipped on or about October 24, 2011, to a customer whose
address was in North York, Ontario, Canada. The Agency paid MANN \$4,228.37
for this wheelchair and accessories.

Attached to this declaration (Attachment A) is a spreadsheet detailing the incidents involved in the 119 wheelchairs mentioned above. Attachment A is incorporated by reference to this Certification for Determination of Probable Cause.

1 Based on the aforementioned, I believed MANN, doing business as Wheelchairs Plus
2 Inc., billed the agency for wheelchairs, in which he was not entitled to receive payment for, in
3 an amount in excess of \$5,000.00, constituting a violation of Theft in the First Degree
(RCW 9A.56.020(1)(b) and RCW 9A.56.030(1)(a), and multiple acts of Medicaid False
Statement (RCW 74.09.230(1)).

4 These acts primarily occurred in King and Thurston Counties, Washington.

5 I certify under penalty of perjury under the laws of the state of Washington that the
6 foregoing is true and correct.

7 DATED this 18th day of July, 2014 at Olympia, Washington.

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11 JEFFREY D. HARTLEY, Investigator
12 Medicaid Fraud Control Unit
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ATTACHMENT

A

CERTIFICATION FOR DETERMINATION
OF PROBABLE CAUSE

1

ATTORNEY GENERAL OF WASHINGTON
Medicaid Fraud Control Unit
PO Box 40114
Olympia, WA 98504-0114
(360) 586-8888

Mann, Michael
095973

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
1	100183776	10/12/2012	10/12/2012	49413	Mfg. invoice shows chair shipped to France, 10/24/11	PDG	PDG: T50 WCP: Bentley
2	100193463	10/12/2012	10/12/2012	53175	Mfg. invoice shows wc shipped to Norwood Canada, invoice 11/07/2012	PDG	Fuse T-50
3	100198045	9/25/2012	9/25/2012	49997	Mfg. invoice shows chair shipped to Denmark, 12/23/11	PDG	PDG: Eclipse WCP: T20
4	100198580	9/24/2012	9/25/2012	IRSE-020810	Mfg. invoice shows wc shipped to Chatsworth, CA on 5/22/12	Sunrise	Quickie Iris
5	100184636	9/24/2012	9/25/2012	43397	Mfg. invoice shows chair shipped to Brooklyn, NY	PDG	PDG: T50 WCP: Stellar
6	100196796	9/24/2012	9/25/2012	12DE004070	Mfg. invoice shows chair shipped to Akron, OH, 5/1/12 A 10/5/12 note in WCP's file states "need to deliver WC"	Invacare	Solara
7	100198336	9/21/2012	9/21/2012	30490	Mfg. invoice shows chair shipped to Portland, OR, 09/20/08	PDG	Fuse T-50
8	100183779	9/14/2012	9/14/2012	49397	Mfg. invoice shows chair shipped to Phoenix, AZ, 10/21/11	PDG	PDG: Bentley WCP: T20
9	100194495	9/13/2012	9/14/2012	A70204116	WCP billed for this serial Number twice ADAMS,	Sunrise	Breezy Ultra 4

¹ In those incidents where the manufacture and WCP are listed in the same box, it is indicating when the model the manufacture reported as appose to the model Mann or his business reported the model to be.

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
					Edith delivered 10/10/07		
10	100193508	9/10/2012	9/10/2012	IRSE-017899	Mfg. invoice shows wc shipped to Newington, CT on 12/19/11	Sunrise	Quickie Iris
11	100175250	9/10/2012	9/13/2012	52175	Chairs was a Manufacturer's Representative Demonstration chair, with no warranty Suspected forged documents used in authorization (Physician Order)	PDG	Luna Bariatric
12	100185228	9/4/2012	9/5/2012	12DE004092	Mfg. invoice shows chair shipped to Anchorage, AK, 5/1/12	Invacare	Solara
13	100185651	9/4/2012	9/11/2012	54891	Mfg. invoice shows chair shipped to The Comfort Company, Winlock, WA, 09/05/12	PDG	Stellar
14	100183773	8/31/2012	9/5/2012	12DE004087	Mfg. invoice shows chair shipped to Bartonville, IL, 4/28/12 Although the Chair was called in on 9/5/12 as having being ready for delivery, there is a note on 9/13/12 saying the chair was ready for delivery	Invacare	Solara
15	100181516	8/27/2012	8/28/2012	45370	Mfg. invoice shows chair shipped to Brooklyn, NY, 4/15/11	PDG	PDG: T50 WCP: Stellar
16	100188058	8/20/2012	8/20/2012	12DE004078	Mfg. invoice shows chair shipped to Lenexa, KS, 5/1/12	Invacare	Solara
17	100170975	8/17/2012	8/17/2012	PLS-100187	Mfg. invoice shows wc shipped to Ozark, MO on 6/9/09 Note in file: 8/27/12 Chair not delivered waiting on parts; 10/16/12 chair delivered	Sunrise	Quickie Plus

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
18	100185598	8/17/2012	8/17/2012	IRSE-020943	Mfg. invoice shows wc shipped to Springfield, OR on 5/30/12	Sunrise	Quickie Iris
19	100165979	8/17/2012	8/21/2012	J9928810245020	Mfg. invoice and Medicaid paperwork shows chairs was originally purchased for Barbara Hardy, 11/12/10; Note: On 8/21/12 called in chair delivery date of 8/17/12, chair delivered on 9/11	Pride	Jazzy 614
20	100187117	8/16/2012	8/17/2012	IRSE-020976	Mfg. invoice shows wc shipped to Fresno, CA on 5/31/12	Sunrise	Quickie Iris
21	100179025	8/16/2012	8/17/2012	12HM019092	Mfg. invoice shows chair shipped to LA Mirada, CA, 8/15/12 Note: On 8/17/12 file noted that delivery date was reported as 8/16/12, subsequent 9/12/12 note :chairs needs to be delivered", 9/13/13 Chair ready for inspection and delivery, need del (delivery) receipt, 9/17/12 close file.	Invacare	9000XT
22	100185232	8/13/2012	8/16/2012	IRSE-020723	Mfg. invoice shows wc shipped to Sunnyvale, GA on 5/22/12	Sunrise	Quickie Iris
23	100160038	8/13/2012	8/13/2012	A111209348	Mfg. records search indicates the serial number associated with this wheel chair could not be found in their system. Note: On 8/13/12 file noted that deliver date was reported as 8/13/12, subsequent 9/11 note SG (Shaun Garrison) delivering chair - picking up T-20	Sunrise	Breezy Ultra 4
24	100183350	8/6/2012	8/13/2012	51988	Mfg. invoice shows chair shipped to Toronto, ON, Canada, 01/22/13	PDG	PDG: Bentley WCP: Stellar

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
25	100180084	8/6/2012	8/7/2012	IRSE-019788	Mfg. invoice shows wc shipped to Albuquerque, NM on 3/24/12	Sunrise	Quickie Iris
26	100170389	8/2/2012	8/6/2012	44108	Mfg. invoice shows chair shipped to Lindsay, Canada, 2/15/11	PDG	PDG: T20 WCP: T50
27	100161820	7/27/2012	7/30/2012	12DE004093	Mfg. invoice shows chair shipped to Newington, CT, 4/30/12	Invacare	Inv: Spree WCP: Solara 3G
28	100155031	6/28/2012	6/28/2012	49445	Mfg. invoice shows chair shipped to Toronto, ON, Canada, 10/24/11 File Note: 6/28/12 called in chair delivery of 6/28/12, subsequent 7/3/12 note RH (Ron Howard) to deliver new Bentley, pickup Stellar, Del (delivered) W/C	PDG	PDG: T50 WCP: Bentley
29	100164841	6/28/2012	6/28/2012	44396	Mfg. invoice shows wc shipped to Anaheim, CA, 03/31/11	PDG	Fuze T-50
30	100173000	6/25/2012	6/26/2012	11FE004917	Mfg. invoice shows chair shipped to Lombard, IL, 7/1/11	Invacare	Solara
31	100159370	6/15/2012	6/20/2012	IRSE-019567	Mfg. invoice shows wc shipped to Cincinnati, OH on 3/20/12	Sunrise	Quickie Iris
32	100160736	5/11/2012	5/14/2012	11FE004890	Mfg. invoice shows chair shipped to Canton, OH, 7/1/11	Invacare	Solara
33	100142956	5/8/2012	5/14/2012	IRSE-019572	Mfg. invoice shows wc shipped to Wilsonville, OR on 3/16/12	Sunrise	Quickie Iris
34	100157077	5/7/2012	5/9/2012	12AE004072	Mfg. invoice shows chair shipped to Latham, NY,	Invacare	Solara

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
1/27/12							
35	100158793	5/7/2012	5/7/2012	49807	Mfg. invoice shows chair shipped to Toronto, ON, Canada, 12/7/11	PDG	PDG: T50 WCP: T20
36	100143831	4/23/2012	4/24/2012	49396	Mfg. invoice shows chair shipped to Hazelwood, MO, 10/20/11	PDG	PDG: Stellar WCP: Bentley
37	100155029	4/18/2012	4/19/2012	IRSE-019733	Mfg. invoice shows wc shipped to Great Falls, MT on 3/22/12 File Note: 4/30 Need Delivery receipt and Serial # put on chair; 5/9/12 Patient "pasted" away, SG brought back chair	Sunrise	Quickie Iris
38	100139848	4/13/2012	4/19/2012	IRSE-019757	Mfg. invoice shows wc shipped to Atlanta, GA on 3/24/12	Sunrise	Quickie Iris
39	100142758	4/9/2012	4/10/2012	11EM036898	Mfg. invoice shows chair shipped to Care Medical, Seattle, WA 5/27/11	Invacare	9000XT
40	100147256	4/2/2012	4/4/2012	IRSE-018257	Mfg. invoice shows wc shipped to Columbus, OH on 1/10/12	Sunrise	Quickie Iris
41	100143161	3/23/2012	3/26/2012	49851	Mfg. invoice shows chair shipped to Omaha, NE, 11/16/11	PDG	PDG: Stellar WCP: T20
42	100142900	3/23/2012	3/26/2012	48563	Mfg. invoice shows chair shipped to Cornwell, ON, Canada, 1/19/12	PDG	Stellar

Mann, Michael
095978

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
43	100115602	2/21/2012	2/21/2012	BH01YQX0823207	There is no delivery records in the file, the serial number is not correct for the Quantum 600 and they if no evidence in the WCP client file or any record seized from WCP supporting the purchase or sell of this chair	Pride	Quantum 6000Z
44	100139840	2/20/2012	2/21/2012	48910	MFG Shipped to WCP on 11/23/2011 (chair was this serial number was also sold to Ruth Squires on 2/14/12)	PDG	Fuze T-20
45	100133339	2/17/2012	2/17/2012	A110514899	Mfg. states serial number does not show up in their system, the delivery date called into HCA was 2/17/12, however, a note in the WCP file on 2/27/12, stated "needs to deliver chair"	Sunrise	Breezy Ultra 4
46	100109684	2/17/2012	2/17/2012	J6929609066020	Mfg. Invoice shows wc shipped to Tim's Home Medical Med1, Bremerton, WA on 11/3/09	Pride	Quantum 1121
47	100131513	2/8/2012	2/9/2012	11JM019088	Mfg. invoice shows chair shipped to Bangor, ME, 10/18/11; however, a note in the WCP file on 2/20/12, stated "needs to deliver chair"	Invacare	9000XT
48	100133635	2/1/2012	2/6/2012	49855	Mfg. invoice shows chair shipped to Toronto, ON, Canada, 11/29/11	PDG	Fuse T-20
49	100133618	1/26/2012	1/27/2012	42498	Mfg. Invoice shows chair was shipped to Hazelwood, MO 11/22/10	PDG	PDG: T50 WCP: T20

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
50	100130026	1/23/2012	1/24/2012	IRSE-018244	Mfg. invoice shows wc shipped to Hohenwald, TN on 1/09/12; however, a note in the WCP file on 2/6/12, states "paid" followed by "Chair not delivered", 4/4 Del (delivery) slip printed, 4/9 close file. There is a delivery receipt in the file, dated 4-5-12, signed by a T. Garcia	Sunrise	Quickie Iris
51	100127199	12/29/2011	1/4/2012	IRSE-017366	Mfg. invoice shows wc shipped to Cerritos, CA on 11/21/11	Sunrise	Quickie Iris
52	100119765	12/29/2011	1/3/2012	Q2H-004634	Mfg. invoice shows wc shipped to Canandaigua, NY on 8/9/11	Sunrise	Quickie 2
53	100114283	12/16/2011	12/20/2011	IRSE-016688	Mfg. invoice shows wc shipped to Lynnwood, WA on 10/14/11	Sunrise	Quickie Iris
54	100097302	12/1/2011	12/5/2011	41998	Mfg. invoice shows chair shipped to Ottawa, ON, Canada, 10/19/10	PDG	Fuse T-50
55	100115952	11/30/2011	12/6/2011	11DE004879	Mfg. invoice shows chair shipped to Eau Claire, WI, 5/3/11	Invacare	Solara
56	100111125	11/28/2011	12/1/2011	11DE004677	Mfg. invoice shows chair shipped to Indianapolis, IN, 5/2/11	Invacare	Inv: Solara 2G WCP: Solara 3G
57	100115606	11/28/2011	12/1/2011	11DE004875	Mfg. invoice shows chair shipped to Bristol, TN, 5/3/11; File note states chair was delivered on 11/28/11, however, a note in the WCP file on 12/12/11, stated "needs to deliver chair" and on 1/9/12 "Delivered Chair"	Invacare	Solara

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
58	100109267	11/28/2011	12/1/2011	11DE004869	Mfg. invoice shows chair shipped to San Antonio, TX, 5/3/11	Invacare	Solara
59	100108494	11/22/2011	11/23/2011	49855	Mfg. invoice shows chair shipped to Toronto, Canada, Invoice date 11/29/2011	PDG	Fuze T-20
60	100118472	11/21/2011	11/23/2011	49853	Mfg. invoice shows chair shipped to North Vancouver, BC, Canada, 11/16/11 Suspected forged authorization documents	PDG	PDG: Stellar WCP T20
61	100107542	10/25/2011	10/26/2011	47908	Mfg. invoice shows chair shipped to Chino, CA Dahlgren did not like the Bentley; put her in Fuze T20 that was Abe Walker's - Serial # 49391. DSHS approved Bentley Manual Tilt	PDG	PDG: T50 WCP: Bentley
62	100108953	10/25/2011	10/26/2011	47885	Mfg. invoice shows chair shipped to Oakville, ON, Canada, 08/02/11; 11/3/11 note in file reads "Changing to 9XT, make sure serial # in file 11JM025668, changed from Bentley to 9XT paid for Bentley	PDG	PDG: T20 WCP: Bentley
63	100107740	10/25/2011	10/26/2011	47889	Mfg. invoice shows chair shipped to Denmark, 9/13/11; the delivery receipt is dated 11/2/11 and has "changed out to 9XT" written on it.	PDG	PDG: Eclipse WCP: Bentley
64	100109826	10/25/2011	10/26/2011	49391	Mfg. invoice shows chair shipped to Anaheim, CA, 4/20/12; Note in file 11/4/11 "Abe Walker did not like T-20; put him in Magorie Greens Bentley, Serial	PDG	PDG: Stellar WCP: T20

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
					#47885".		
65	100101822	10/24/2011	10/26/2011	11DE004868	Mfg. invoice shows chair shipped to Lancaster, OH, 05/03/11	Invacare	Solara
66	100105568	10/21/2011	10/26/2011	11JM019091	Mfg. invoice shows chair shipped to Tupelo, MS, 10/17/11	Invacare	9000XT
67	100103273	10/14/2011	10/18/2011	11HE003126	Mfg. invoice shows chair shipped to Cheektowaga, NY, 8/23/11; File note 10/18/11, SG to deliver chair on 10/20	Invacare	Solara
68	100104880	10/5/2011	10/6/2011	47677	Mfg. invoice shows chair shipped to Denmark, 3/12/12	PDG	PDG: Stellar WCP Bentley
69	100102850	10/4/2011	10/6/2011	11JM026288	Mfg. invoice shows chair shipped to Parsons, TN, 10/28/11	Invacare	Inv: Tracer WCP: 9000XT
70	100102841	9/20/2011	9/20/2011	46873	Mfg. invoice shows chair shipped to Toronto, ON, Canada, invoice date 7/11/12	PDG	PDG: Fuze T20 WCP T50
71	100096903	9/15/2011	9/27/2011	Q2H-004533	Mfg. invoice shows wc shipped to Newington, CT on 7/15/11	Sunrise	Quickie 2
72	100097222	9/7/2011	9/8/2011	IRSE-013702	Mfg. invoice shows wc shipped to Alexandria, VA on 4/20/11; 9/26/11 File note " Not delivered yet"	Sunrise	Quickie Iris
73	100093357	8/25/2011	8/25/2011	063363-1-1-1	Mfg. records search indicates the serial number associated with this wheel chair could not be found in their system	Gendron	Regency XL 2000

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
74	100094209	8/12/2011	8/15/2011	46723	Mfg. invoice shows wc shipped to Toronto, Canada, 7/6/12	PDG	PDG: Astrotite Folding WCP: T50
75	100091164	8/1/2011	8/2/2011	IRSE-014781	Mfg. invoice shows wc shipped to Wall Township, NJ on 6/24/11	Sunrise	Quickie Iris
76	100093365	7/27/2011	7/27/2011	47352	Mfg. invoice shows chair shipped to Vancouver, BC, Canada, 6/8/11	PDG	PDG: Stellar WCP: Bentley
77	100094623	7/27/2011	7/27/2011	B01106633	Mfg. invoice shows wc shipped to WCP on 6/28/11, Same Serial number was listed for Crofoot, Willmeta, 8/25/11	Sunrise	Breezy Ultra 4
78	100090977	7/21/2011	7/22/2011	49198	Mfg. invoice shows chair shipped to Australia, 10/6/11	PDG	PDG: T20 WCP: T50
79	100090996	7/14/2011	7/20/2011	47196	Mfg. invoice shows chair shipped to Manchester, HN, 06/23/09	PDG	PDG: Stellar WCP: Bentley
80	100086357	6/29/2011	7/1/2011	IRSE-014337	Mfg. invoice shows wc shipped to Cheektowaga, NY on 6/2/11	Sunrise	Quickie Iris
81	100087780	6/21/2011	6/22/2011	47255	Mfg. invoice shows chair shipped to WCP, 8/10/11, chair was also sold to Victoria Rich, 6/28/11	PDG	Fuse T-20
82	100082328	6/9/2011	6/9/2011	49132	Mfg. invoice shows chair shipped to Durham, ON, Canada, 10/4/11	PDG	PDG: Eclipse 600 WCP: T50

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
83	100086332	6/9/2011	6/9/2011	IRSE-001458	Mfg. invoice shows wc shipped to WCP on 2/13/09, Same Serial number was listed for client Debritu Teferi	Sunrise	Quickie Iris
84	100080351	6/6/2011	6/7/2011	QT-39319	Mfg. invoice shows wc shipped to Renton, WA on 4/7/03; File note states "get serial # from Ron"	Sunrise	Quickie TS
85	100087734	6/6/2011	6/7/2011	47344	Mfg. invoice shows chair shipped to North Vancouver, BC, Canada, 8/26/11	PDG	PDG: T50 WCP T20
86	100061955	6/3/2011	6/7/2011	43107	Mfg. invoice shows chair shipped to Hazelwood, MO, 12/20/10	PDG	Fuse T-50
87	100079521	6/1/2011	6/9/2011	B01106623	Mfg. invoice shows wc shipped to Canada on 3/17/11	Sunrise	Breezy Ultra 4
88	100086712	5/31/2011	6/1/2011	46854	Mfg. invoice shows chair shipped to Toronto, ON, Canada, 9/6/12; Note in file: 5/31 "Make serial # for T-50"	PDG	Fuse T-50
89	100066463	5/23/2011	6/1/2011	11BE000156	Mfg. invoice shows chair shipped to Watertown, NY, 2/8/11	Invacare	Solara
90	100079535	5/12/2011	5/13/2011	B00523204	Mfg. records search indicates the serial number associated with this wheel chair could not be found in their system	Sunrise	Breezy Ultra 4
91	100078038	4/25/2011	4/25/2011	A90213969	Mfg. records search indicates the serial number associated with this wheel chair could not be found in their system	Sunrise	Breezy Ultra 4

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
92	100027883	4/22/2011	4/25/2011	33361	Mfg. invoice shows chair shipped to Portland, OR, 6/4/09	PDG	Fuse T-50
93	100072486	4/18/2011	4/19/2011	IRSE-010706	Mfg. invoice shows wc shipped to WCP on 10/7/10, Same Serial number was listed for Norma Pecolar	Sunrise	Quickie Iris
94	100069325	3/25/2011	3/25/2011	13981	Mfg. invoice shows chair shipped to Tonawanda, NY, 3/21/04	PDG	Bentley
95	100053583	3/16/2011	3/9/2011	IRSE-012787	Mfg. invoice shows wc shipped to WCP on 2/25/11 (chair was delivered on 1/31/11) Same Serial number was listed for Margaret Ewing 3/12/11	Sunrise	Quickie Iris
96	100047403	2/10/2011	2/10/2011	IRSE-010698	Mfg. invoice shows wc shipped to WCP on 2/13/09, Same Serial number was listed for Client Dionisia Acena, 11/5/10	Sunrise	Quickie Iris
97	100060500	2/9/2011	2/10/2011	IRSE-036869	Invoice shows WCP received WC in March 2008, sold to Herbert Fregia, 7/7/08	Sunrise	Quickie Iris
98	100041477	2/7/2011	2/8/2011	42913	Mfg. invoice shows chair shipped to Denmark, 2/8/11 This chair was partially paid for by Blue Cross Blue Shield as the primary insurance (\$2,498.09)	PDG	PDG: Eclipse WCP: Bentley
99	100050122	2/7/2011	2/8/2011	42909	Mfg. invoice shows chair shipped to Chattanooga, TN, 12/14/10	PDG	Bentley

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
100	100042063	2/4/2011	2/4/2011	IRSE-010708	Mfg. invoice shows wc shipped to WCP on 10/7/10, Same Serial number was listed for George Huang, 11/30/10	Sunrise	Quickie Iris
101	100059702	1/31/2011	3/9/2011	IRSE-012788	WCP Received the Chair on 2/25/11 Chair was sold to Ladislade Oregon, 03/11/11	Sunrise	Quickie Iris
102	100053729	1/31/2011	3/8/2011	37281	Mfg. invoice shows chair shipped to College PT., NY, 11/18/10	PDG	PDG: T50 WCP: Bentley
103	100039631	12/9/2010	12/10/2010	IRSE-010718	Mfg. invoice shows wc shipped to WCP on 10/7/10, Same Serial number was listed for Gerald T. Powers, 11/12/10	Sunrise	Quickie Iris
104	100027884	11/2/2010	11/2/2010	A70902806	Mfg. invoice shows wc shipped to Marianna, FL on 11/8/07	Sunrise	Breezy Ultra 4
105	100011075	9/15/2010	9/16/2010	30938	Mfg. invoice shows chair shipped to Lincoln, NE, 9/22/08	PDG	PDG: T50 WCP T20
106	100027886	9/15/2010	9/16/2010	32338	Mfg. invoice shows chair shipped/Invoiced to WCP about 1/8/09, Chair was sold to DSHS Client Birdie Nuebauer, who died on the same day the chair was delivered?8/19/10 the chair was subsequently used as a rental for a hospice patient before being sold to Mason	PDG	Fuze T-20

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#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
107	320913514	3/29/2010	4/1/2010	04H759346	According to Mfg. the first two digits of Invacare's serial numbers indicate a year. Therefore this would have been a 2004 chair delivered in 2009	Invacare	Solara
108	320933477	3/4/2010	3/11/2010	J4741709023020	Chair was originally sold to DSHS client Dorothy Winston, 11/07/08. There are notes in Wilcox's WCP file regarding what the pride serial numbers mean and a note identifying the chair as Winston's. The chair underwent several repairs	Pride	Jazzy 1650 HD
109	1/22/2010	1/22/2010	1/22/2010	A60907642	Mfg. records indicate this wheelchair was shipped to WCP on 8/31/2007. A chair with the same serial number was sold to Sonja Craig , in Jan 2007	Invacare	9000XT
110	320912258	1/13/2010	1/15/2010	30438	Mfg. invoice shows chair shipped to Sydney, Canada	PDG	Bentley
111	320908085	12/31/2009	1/4/2010	J5728209020020	WC was purchased from Stat Medical on 12/29/09 Chair was delivered 1/8/10	Pride	Quantum 600
112	320913621	12/18/2009	12/21/2009	A70708763	WCP billed for this serial Number twice (Nelson, Frank delivered 12/11/07) WCP also originally received this chair from Sunrise medical September 2007	Sunrise	Breezy Ultra 4

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
113	320924637	12/11/2009	12/15/2009	09HM058886	Mfg. records search indicates the serial number associated with this wheel chair could not be found in their system	Invacare	Tracer IV
114	320924664	12/4/2009	12/4/2009	32907	Mfg. invoice shows chair shipped to Newington, CT, 4/2/08 This is no delivery records in the file, the serial number is not correct for the Quantum 600 and they if no evidence in the WCP client file or any record seized from WCP supporting the purchase or sell of this chair	PDG	PDG: Stellar WCP: T20
115	320933351	11/10/2009	1/20/2010	A71206952	Mfg. invoice shows wc shipped to Columbia, MO on 7/2/08 Invoice shows a deliver date of 1/22/10	Sunrise	Breezy Ultra 4
116	320919509	11/9/2009	11/9/2009	07KM015	Mfg. records search indicates the serial number associated with this wheel chair could not be found in their system (2007 Ser# for a 2009 delivery)	Invacare	9000XT
117	320922274	10/8/2009	10/13/2009	CGT-024700	WCP received the chair 11-17-2006, Same Serial number was listed for Myrtle Graham, 6/1/07	Sunrise	Quickie Iris

#	Prior Authorization	Date of Delivery (DOD)	Date on which DOD was reported	Reported Serial Number	Notes	Manufacture	Model ¹
118	320861106	7/29/2009	8/3/2009	19954	Mfg. invoice shows chair shipped to WCP, 5/17/2006, unknown who chair was ordered for, however the chair was being used as a Rental at Ballard Care and Rehab from 12/3/07 through at least 4/2/08	PDG	Bentley
119	320861124	7/28/2009	8/5/2009	08IM375902	Mfg. records search indicates the serial number associated with this wheel chair could not be found in their system	Invacare	9000XT

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