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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAI'I

STATE OF HAWAI'I,

vs.

ROBERT WOLF and  
CHING-YING JAO,

Defendants.

CR. NO.

COUNT 1:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694)

COUNT 2:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-1)

COUNT 3:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-2)

COUNT 4:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-3)

(Caption continued on next page)

COUNT 5:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-4)

COUNT 6:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-5)

COUNT 7:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-6)

COUNT 8:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-7)

COUNT 9:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-8)

COUNT 10:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-9)

COUNT 11:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-10)

COUNT 12:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-11)

COUNT 13:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-12)

COUNT 14:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-13)

COUNT 15:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-14)

COUNT 16:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-15)

COUNT 17:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-16)

COUNT 18:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-17)

COUNT 19:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-18)

COUNT 20:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-19)

COUNT 21:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-20)

COUNT 22:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-21)

COUNT 23:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-22)

COUNT 24:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-23)

COUNT 25:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-24)

COUNT 26:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-25)

COUNT 27:  
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§346-43.5, H.R.S.  
(A.G. NO. 15-11694-26)

COUNT 28:  
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§346-43.5, H.R.S.  
(A.G. NO. 15-11694-27)

COUNT 29:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-28)

COUNT 30:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-29)

COUNT 31:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-30)

COUNT 32:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-31)

COUNT 33:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-32)

COUNT 34:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-33)

COUNT 35:  
MEDICAL ASSISTANCE FRAUD  
§346-43.5, H.R.S.  
(A.G. NO. 15-11694-34)

FELONY INFORMATION; EXHIBIT "A"

FELONY INFORMATION

Counts 1- 6 relate to Client Tieman Ryan.

COUNT 1:

On or about January 3, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on January 10, 2014 for payment, falsely stated or represented a material fact

that WOLF and JAO provided psychotherapy services to client Ryan, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 2:

On or about January 8, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 3, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Ryan, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 3:

On or about January 14, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false

statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 3, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Ryan, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 4:

On or about January 31, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 3, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Ryan, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services,

or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 5:

On or about February 4, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 9, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Ryan, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 6:

On or about February 14, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical



Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 17, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Ryan, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

Counts 7 – 35 relate to Client Timothy Kakalia ("Kakalia").

COUNT 7:

On or about July 26, 2013, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on August 4, 2013 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Ryan, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 8:

On or about August 28, 2013, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on September 10, 2013 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 9:

On or about September 11, 2013, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on September 18, 2013 for payment, falsely stated or represented a material

fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 10:

On or about October 16, 2013, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on September 23, 2013 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 11:

On or about November 13, 2013, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false

statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on November 19, 2013 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 12:

On or about November 27, 2013, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on December 2, 2013 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services,

or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 13:

On or about December 13, 2013, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on December 16, 2013 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 14:

On or about February 12, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical

Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 17, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 15:

On or about March 21, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on March 31, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

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COUNT 16:

On or about April 4, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on April 9, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 17:

On or about April 16, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on April 19, 2014 for payment, falsely stated or represented a material fact

that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 18:

On or about May 14, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on May 19, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 19:

On or about June 11, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false



statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai`i Revised Statutes. The claim, received on June 16, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 20:

On or about July 9, 2014, in the City and County of Honolulu and State of Hawai`i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai`i Revised Statutes. The claim, received on July 14, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services,

or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 21:

On or about August 1, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on August 3, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 22:

On or about August 13, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical

Assistance Fraud, in violation of §346-43.5 of the Hawai`i Revised Statutes. The claim, received on August 26, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 23:

On or about September 3, 2014, in the City and County of Honolulu and State of Hawai`i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai`i Revised Statutes. The claim, received on September 17, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

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COUNT 24:

On or about September 10, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on October 1, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 25:

On or about September 17, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on September 21, 2014 for payment, falsely stated or represented a material

fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 26:

On or about October 15, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on October 18, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 27:

On or about November 5, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false

statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on November 9, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 28:

On or about December 3, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on December 8, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services,

or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 29:

On or about December 10, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on December 14, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 30:

On or about December 17, 2014, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical

Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on December 31, 2014 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 31:

On or about January 14, 2015, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on January 20, 2015 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

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COUNT 32:

On or about February 5, 2015, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 8, 2015 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 33:

On or about February 11, 2015, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on February 16, 2015 for payment, falsely stated or represented a material fact

that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 34:


On or about March 11, 2015, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on March 21, 2015 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

COUNT 35:

On or about April 8, 2015, in the City and County of Honolulu and State of Hawai'i, ROBERT WOLF and CHING-YING JAO did knowingly and willfully make or cause to be made to the medical assistance program, also known as Medicaid, a false

statement or false representation of material fact in an application for payment or claim, for the furnishing of services or for the purpose of obtaining greater compensation than that to which they are legally entitled, thereby committing the offense of Medical Assistance Fraud, in violation of §346-43.5 of the Hawai'i Revised Statutes. The claim, received on April 12, 2015 for payment, falsely stated or represented a material fact that WOLF and JAO provided psychotherapy services to client Kakalia, when no such session took place. The Medical Assistance Fraud alleged herein was not discovered until February 18, 2015, by the Med-QUEST Division, Department of Human Services, or a person who has a legal duty to represent the Med-QUEST Division, Department of Human Services.

DATED: Honolulu, Hawai'i SEP 18 2017

  
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DAWN S. SHIGEZAWA  
Deputy Attorney General  
State of Hawai'i

# NOTICE OF ELECTRONIC FILING

**Electronically Filed  
FIRST CIRCUIT  
1CPC-17-0001329  
20-SEP-2017  
11:29 AM**

An electronic filing was submitted in Case Number 1CPC-17-0001329. You may review the filing through the Judiciary Electronic Filing System. Please monitor your email for future notifications.

**Case ID:** 1CPC-17-0001329

**Title:** State of Hawaii v. Robert Wolf, Jao Ching-Ying

**Filing Date / Time:** WEDNESDAY, SEPTEMBER 20, 2017 10:39:51 AM

**Filing Parties:** State of Hawaii Criminal Prosecution by Attorney General  
Dawn Shigezawa

**Case Type:** Circuit Court Criminal

**Lead Document(s):** Felony Info

**Supporting Document(s):** Felony Info

If the filing noted above includes a document, this Notice of Electronic Filing is service of the document under the Hawai'i Electronic Filing and Service Rules.

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This notification is being electronically mailed to:  
Dawn S. Shigezawa ( *Dawn.S.Shigezawa@hawaii.gov* )  
The following parties need to be conventionally served:  
Douglas S. Chin  
Jao Ching-Ying  
Robert Wolf

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