

**INFORMATION**

JD-CR-71 Rev. 10-10

STATE OF CONNECTICUT  
SUPERIOR COURT

Disposition date.

Police Case number  
**2014-00103**

Agency name  
**Office of the Chief State's Attorney**

Agency number  
**5700**

**Title, Allegation and Counts**

State of Connecticut vs. (Name of accused)  
**Schnitzke, Shawna J.**

Residence (Town) of accused  
[REDACTED]

Docket number

Address  
[REDACTED]

Date of birth  
[REDACTED]

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that:

To be held at (Town)  
**Hartford**

Geographical area number  
**14**

Court date

Count One — Did commit the offense of:  
**Consp. to Commit Larceny First Degree by Defrauding a Public Comm.**

Continued to Purpose Reason

At (Town) On or about (Date)  
**Hartford, CT 5/30/13 - 12/5/13**

In violation of General Statute number  
**53a-48/53a-122 (a) (4)**

Count Two — Did commit the offense of:  
**Consp. to Commit Att. Larceny Second Degree by Defrauding a Public Comm.**

At (Town) On or about (Date)  
**Hartford, CT 11/10/13 - 12/5/13**

In violation of General Statute number  
**53a-48/53a-123 (a) (4)**

Count Three — Did commit the offense of:  
**Insurance Fraud**

At (Town) On or about (Date)  
**Hartford, CT 5/30/13 - 12/5/13**

In violation of General Statute number  
**53a-215**

See other sheet for additional counts Date **6/10/2015**

Signed (Prosecuting Authority)  
*Lital Keenan*

**Court Action**

Defendant advised of rights before plea (Judge) (Date) Bond Surety  10 % Election (Date)  Cash  CT  JY  Attorney  Public defender Guardian Bond change Seized property inventory number

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number Cost  IMP  NCI Bond information  Bond forfeited  Forfeiture vacated  Forfeiture vacated and bond reinstated Application fee - receipt number if paid Circle one W I Q Program fee - receipt number if paid Circle one W I Q Probation fee - receipt number if paid Circle one W I Q Prosecutor on original disposition Reporter/monitor on original disposition Signed (Clerk) Signed (Judge)

**ARREST WARRANT APPLICATION**

JD-CR-64b Rev. 10-10  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

For Court Use Only	
Supporting Affidavits sealed	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Police Case number <b>2014-00103</b>	Agency name <b>Office of the Chief State's Attorney</b>	Agency number <b>5700</b>
Name (Last, First, Middle Initial) <b>Schnitzke, Shawna J.</b>	Residence (Town) of accused [REDACTED]	Court to be held at (Town) <b>Hartford</b>
		Geographical Area number <b>14</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the:  Affidavit Below.  Affidavit(s) Attached.

Date <b>6/10/2015</b>	Signed (Prosecuting authority) <i>Richard Keenan Greenleaf, Jr.</i>	Type/print name of prosecuting authority <b>Richard Keenan Greenleaf, Jr.</b>
--------------------------	--	--

**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

1. That, I Inspector Tracy Enns, have been a sworn police officer for the past 27 years. I am employed by the Division of Criminal Justice, Office of the Chief State's Attorney for the State of Connecticut, and assigned to the Medicaid Fraud Control Unit (MFCU). I have received specialized training in the investigation of fraud type crimes. The facts and circumstances contained in this affidavit are from personal knowledge, investigation, and information supplied by other officers, or other acting in their official capacity.

2. That, the Medicaid Fraud Control Unit received a DSS 42 CFR 455.21 (a)(1) Referral dated 5/29/14, from the Department of Social Services-Office of Quality Assurance (DSS-OQA). This referral was based on an anonymous complaint DSS received on 8/14/13, alleging Medicaid provider Dana DeCillis LPC (DeCillis), AVRS# [REDACTED] is double billing for patient sessions, billing for services not rendered, having unprofessional contact with patients, and purchasing unused prescription medication from patients. This matter was also referred to the US Department of Health and Human Services - Office of the Inspector General (HHS-OIG), and HHS-OIG Special Agent Justin Lehnw was assigned to this case.

3. That, DSS is a single state agency that operates, administers, and oversees the medical assistance program as Medicaid, pursuant to Connecticut General Statute, 17b-260 et seq., and Title XIX of the Social Security Act as amended. Medicaid is a government insurance program for persons whose income and resources are insufficient to pay for healthcare.

4. That, the State of Connecticut Medicaid program is an "insurance company" as defined in C.G.S. 38a-1(11) "insurer" or "insurance company" includes any person or combination of persons doing any kind of form of insurance business other than a fraternal benefit society, and shall include a receiver of any insurer when the context reasonably permits.

(This is page 1 of a 6 page Affidavit.)

Date <b>6/10/15</b>	Signed (Affiant) <i>Tracy Enns 2206</i>
Jurat <b>06/15/15</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>Inspector [Signature] 2254</i>

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature <i>[Signature]</i>	Signed at (City or town) <b>Hartford</b>	On (Date) <b>6/15/15</b>	Signed (Judge/Judge Trial Referee) <i>[Signature]</i>	Name of Judge/Judge Trial Referee <b>KWAK</b>
--	---	-----------------------------	--	--

**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 10-10  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**

www.jud.ct.gov

Name (Last, First, Middle Initial) <b>Schnitzke, Shawna J.</b>	Residence (Town) of accused [REDACTED]	Court to be held at (Town) <b>Hartford</b>	Geographical Area number <b>14</b>
---	---	---	---------------------------------------

**Affidavit - Continued**

5. That, a CPT code is an acronym for Current Procedural Terminology published by the American Medical Association. The purpose of the five digit coding system is to provide uniform language that accurately describes medical, surgical, and diagnostic services.

6. That, during a review of DeCillis for the period of 7/5/13 to 12/20/13, DSS found DeCillis was operating a business out of Blissful Journeys Psychotherapy, LLC, [REDACTED], with Shawna Schnitzke (Schnitzke). During this time, DSS notified DeCillis and Schnitzke of their review and requested client information. DSS indicated since this information was not submitted to them in a timely manner, they placed a hold on all Medicaid payments to DeCillis on 11/26/13.

7. That, during the DSS review period, DeCillis was licensed in CT by the Department of Public Health (DPH) under Professional Counselor License (PCL) # [REDACTED] expiration 10/31/14. Schnitzke who was not licensed, had a pending CT Clinical Social Worker (LCSW) license with DPH. It was also learned DPH had 2 active investigations against DeCillis' CT license, and 1 against Schnitzke's pending CT license.

8. That, DeCillis submitted an application to the CT Medical Assistance Program (CMAP) for enrollment as a licensed individual behavioral health clinician on 2/22/13, which was approved on 3/2/13. CMAP is a DSS medical program, which provides medical assistance to low income individuals and families, the elderly, persons with disabilities, and people with specific medical conditions and requirements. When a provider is enrolled in CMAP as an individual provider, this provider can only submit Medicaid claims for services they personally render under the DSS Provider Enrollment Agreement. As a result of this, DeCillis was not authorized to submit any claims to CMAP for services rendered by Schnitzke. In addition, Schnitzke would not have been eligible to enroll in CMAP herself because she was not an authorized licensed provider.

9. That, within this DSS review period, CMAP made \$26,136.34 in Medicaid payments to and held in suspension \$4,286.58 in payments for DeCillis under her unique NPI# [REDACTED] and AVRS# [REDACTED], for 11 Medicaid clients. Of these 11 clients, investigation revealed there were CMAP billings under DeCillis for 2 clients, where the therapy was actually provided by Schnitzke not DeCillis. In this affidavit, these 2 Medicaid clients are being identified by their initials in order to comply with the Health Insurance Portability and Accountability Act, Title 11, Section 2.1 (Patient Health Information Privacy Rule). These individuals are Client 1 "J.L." and Client 5 "B.M."

10. That, based on interviews of Client 1 "J.L." and supporting text messages by Client

(This is page 2 of a 6 page Affidavit.)

Date <b>6/10/15</b>	Signed (Affiant) <b>Det. [Signature]</b>
Jurat Subscribed and sworn to before me on (Date) <b>06/15/15</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <b>[Signature]</b>
Reviewed (Prosecutorial Official) <b>[Signature]</b>	Date <b>6/10/2015</b>
Reviewed (Judge/Judge Trial Referee) <b>[Signature]</b>	Date <b>6/15/15</b>

**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 10-10  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT**

**SUPERIOR COURT**

www.jud.ct.gov

Name (Last, First, Middle Initial) <b>Schnitzke, Shawna J.</b>	Residence (Town) of accused [REDACTED]	Court to be held at (Town) <b>Hartford</b>	Geographical Area number <b>14</b>
---	---	---	---------------------------------------

**Affidavit - Continued**

1 "J.L.," it was determined by Lehnaw and I, that DeCillis submitted fraudulent claims to DSS for the treatment of Client 1 "J.L." by Schnitzke. I verified the phone numbers used in these text messages, [REDACTED] (DeCillis) and [REDACTED] (Schnitzke), did in fact belong to these individuals. On 3/30/15, after examining the text messages between herself and DeCillis, Client 1 "J.L." said she recalls she began therapy with Schnitzke a couple of weeks before 5/30/13, while her daughter continued therapy with DeCillis. Client 1 "J.L." said she knows this because DeCillis text messaged her on 5/30/13, asking for her and her daughter's Medicaid information, which she had already given to Schnitzke a couple of weeks earlier during a therapy session with Schnitzke. The Medicaid billing for Client 1 "J.L." after 5/30/13, showed CPT code 90837 (Psychotherapy, 60 minutes with patient and/or family member) was fraudulently billed for: 6/2/13; 6/6/13; 6/13/13; 6/20/13; 6/26/13; 7/3/13; 7/10/13; 7/18/13; 7/25/13; 7/29/13; 8/1/13; and 8/7/13; at the rate of (\$94.63) per visit, which totaled \$1,135.56. In addition, there were other text messages either confirming or implying Client 1 "J.L." was seeing Schnitzke as a therapist.

11. That, Client 1 "J.L." told Lehnaw and I on 8/1/14, that Schnitzke initially told her she only takes cash because she couldn't pass a test, but later took her Medicaid information so Medicaid could pay for the services provided by Schnitzke. Over time, exact date unknown, Client 1 "J.L." said Schnitzke offered to split half the Medicaid insurance money with her for extra visits that would never actually occur. Client 1 "J.L." would further explain to MFCU Inspector Forrest John Beaulieu and I on 3/30/15, that this conversation took place in the parking lot of her residence after Schnitzke stopped by to solicit her for her pain killers, which Schnitzke often did. Client 1 "J.L." said she can't recall what exactly was said regarding splitting the Medicaid money, didn't understand all the details, but knew she didn't want to be involved and declined the offer. In addition, Client 1 "J.L." said she hid the fact that she was seeing Schnitzke for therapy to the mental health facility where she obtained her prescription medications because Schnitzke asked her to.

12. That, DeCillis' knowledge of the Medicaid fraud is confirmed in text messages between Client 1 "J.L." and DeCillis on 8/9/13. DeCillis says, "I was a little blind to some of the Shawna/ bill stuff and wanted to make sure you're ok with all that going on, if you're good that's good, if ur blind too then all the better! Just wanted to let you know if its ever weird u can trust me not to blab to Shawna...I don't want u to feel split either so hopefully all is ok?" Client 1 "J.L." responds, "No I don't know and I might have to call the insurance company and get a copy of the visits." On 3/30/15, Client 1 "J.L." tells Beaulieu and I, this made her angry because Husky only gives you so many visits, her daughter needed the therapy, and she wasn't sure how much fraud was done in her and her daughter's name.

(This is page 3 of a 6 page Affidavit.)

Date	6/10/15	Signed (Affiant)	[Signature]	
Jurat	Subscribed and sworn to before me on (Date) 06/15/15	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature] 2254	
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date	
[Signature]	6/10/2015	[Signature]	6/15/15	

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 10-10  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial) Schnitzke, Shawna J.	Residence (Town) of accused [REDACTED]	Court to be held at (Town) Hartford	Geographical Area number 14
--	---	--	--------------------------------

## Affidavit - Continued

13. That, on 8/4/14, a non-Medicaid patient of Schnitzke called me stating he wished to be interviewed. This male's name and address is not being disclosed in order to comply with the requirements of C.G.S.54-86e, where upon information regarding the name and address of victims of sexual assault is to be confidential. For reporting purposes, I will refer to this male as John Doe. John Doe stated he is making a complaint because DeCillis and Schnitzke are victimizing vulnerable clients and need to be stopped.

14. That, John Doe told Lehnaw and I, he started seeing Schnitzke as his therapist at BJP, in about 2/13, then this relationship developed into a friendship and voluntary sexual relationship with both DeCillis and Schnitzke. Regarding Medicaid, John Doe said DeCillis and Schnitzke told him they scammed the Medicaid program by obtaining Medicaid authorization, seeing a client once or twice a week, then billing Medicaid for 3 or 4 visits instead. John Doe said he asked DeCillis and Schnitzke what they would do if they got caught, and they laughed stating, "prove we didn't see them."

15. That, John Doe said DeCillis and Schnitzke also sent him a photo attached to a text message of a Medicaid check they received with the caption, "all this for half the work," and a photo of DeCillis and Schnitzke dividing money at DeCillis' residence holding a ledger, which he emailed to DPH on 9/11/13. I verified with DPH Nurse Consultant Adrienne Anderson, that DPH received from John Doe text messages between John Doe, DeCillis, and Schnitzke, and received a photo of a check #19011671 payable to DeCillis, issued by DSS on 7/9/13 for \$5,271.05. Anderson said she didn't receive documentation with the caption, "all this for half the work," or a photo of DeCillis and Schnitzke dividing money holding a ledger. I then attempted to obtain this information off of John Doe's phone through the CT Forensic Laboratory Computer Crimes Unit. They advised this information was not retrievable.

16. That, John Doe said he saw inside this ledger once depicted in the above mentioned photo and it detailed client billing to include date of service, "D" or "S" when a payment came in, and disbursement. John Doe said it was his impression, DeCillis and Schnitzke didn't want this book discovered because they kept it at DeCillis' residence in MA and told him they had to keep their business records out of CT.

17. That, on 12/10/14, Lehnaw and I interviewed Client 5 "B.M.," who identified Schnitzke as her therapist. At BJP, Client 5 "B.M." said she saw Schnitzke for therapy maybe twice. Since DeCillis couldn't bill for services performed by Schnitzke, or bill for services that didn't take place, the following 38 fraudulent Medicaid billings were identified totaling \$3,407.55:

## 1. CPT code 90791 (Psychiatric Diagnostic Evaluation) 6/12/13 (\$103.25)

(This is page 4 of a 6 page Affidavit.)

Date 6/10/15	Signed (Affiant) [Signature]
Jurat Subscribed and sworn to before me on (Date) 6/15/15	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) [Signature] 2254
Reviewed (Prosecutorial Official) [Signature]	Date 6/12/15
Reviewed (Judge/Judge Trial Referee) [Signature]	Date 6/15/15

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 10-10  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Schnitzke, Shawna J.	[REDACTED]	Hartford	14

## Affidavit - Continued

2. CPT code 90837 (Psychotherapy, 60 Minutes with Patient) 6/19/13; 6/24/13; 7/1/13; 7/8/13; 7/15/13; 7/26/13; 7/29/13; 8/5/13; 8/11/13; 8/16/13; 8/21/13; 8/26/13; 9/4/13; 9/9/13; 9/18/13; 9/23/13; 9/30/13; 10/3/13; 10/9/13; 10/16/13; 10/23/13; 10/30/13; 11/6/13; 11/10/13; 11/20/13; 12/5/13 for (\$94.63 ) each totaling \$2,460.38
3. CPT code 90847 (Family Psychotherapy Conjoint) 8/31/13; 9/14/13; 9/28/13; 10/6/13; 10/13/13; 10/19/13; 10/27/13; 11/3/13; 11/15/13; 11/23/13; 11/30/13 for (\$76.72) each totaling \$843.92

18. That, during Client 5 "B.M.'s" interview, Client 5 "B.M." turned over to me a 2 page poem she had written about the pain Schnitzke's deceit caused her, and 21 pages of text messages between her and Schnitzke from 10/21/13, to 12/29/13. Client 5 "B.M.," identified Schnitzke's phone number as [REDACTED] and her phone number as [REDACTED]. Reviewing these text messages, Client 5 "B.M.," pointed out Schnitzke wrote, "Remember if Medicaid calls u YOU need to say you see Dana DeCillis for weekly individual this is for ur insurance otherwise I go to jail sista lol. Thanks." Client 5 "B.M.," said she tried to figure out what Schnitzke was talking about, so she asked more questions, and Schnitzke says she's also been billing Medicaid for couples visits under Client 5 "B.M.," sometimes weekly. Client 5 "B.M.," said she asked why Schnitzke would go to jail, and Schnitzke responds, "shhhhh don't tell anyone and yah medicaid fraud jail time." Angered, Client 5 "B.M.," said she texted back her displeasure because she and her child with special needs, rely on their benefits. Schnitzke's text message reply included, "I apologize with my whole heart and soul I am so sorry I betrayed you like this. I was caught up in trying to make a business work without any money." Schnitzke goes on to say she is shutting down her business because it is the right thing to do, that she may go to jail for this, and maybe this is what she needs. Client 5 "B.M.'s" cellular phone [REDACTED] was forensically examined and downloaded the CT Forensic Laboratory Computer Crimes Unit, verifying these text messages were on her phone.

19. That, Lehnaw and I attempted to interview DeCillis and Schnitzke. DeCillis said her attorney would call regarding an interview, but no call was received. Two voicemails were left for Schnitzke at work, and Schnitzke did not return these calls.

20. That, a criminal history check for DeCillis and Schnitzke were negative in CT and MA. During this investigation, information was obtained to support DeCillis and Schnitzke as having a drug habit during 2013.

21. That on 4/14/15, DSS Forensic Fraud Examiner Janet Bacon identified 3 payment holds under DeCillis after 11/26/13, payment 019023054, 019022207, and 019021404. Of the fraudulent claims verified in this case, these payment holds affected billings for only 1 client Schnitzke

(This is page 5 of a 6 page Affidavit.)

Date	6/10/15	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 06/15/15	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
[Signature]	6/10/2015	[Signature]	6/15/15

**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 10-10  
 C.G.S. § 54-2a  
 Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
 SUPERIOR COURT**

www.jud.ct.gov

Name (Last, First, Middle Initial) <b>Schnitzke, Shawna J.</b>	Residence (Town) of accused [REDACTED]	Court to be held at (Town) <b>Hartford</b>	Geographical Area number <b>14</b>
---	---	---	---------------------------------------

**Affidavit - Continued  
 had seen as their provider:**

1. Client 5 "B.M.," CPT code 98037 for service dates 11/10/13; 11/20/13 and 12/5/13 for (\$94.63) each totaling \$283.89
2. Client 5 "B.M.," CPT code 90847 for service dates 11/15/13; 11/23/13 and 11/30/13 for (\$76.72) each totaling \$230.16. Based on this, the attempted larceny total is \$514.77.

22. That based on this investigation, I have probable cause to believe Schnitzke committed the following criminal violations, C.G.S. 53a-48/53a-122 (a) (4) Conspiracy to Commit Larceny in the First Degree by Defrauding a Public Community for the amount of \$4,543.11, C.G.S. 53a-48/53a-123 (a) (4) Conspiracy to Commit Attempted Larceny in the Second Degree by Defrauding a Public Community for the amount of \$514.77, and C.G.S. 53a-215 Insurance Fraud.

(This is page 6 of a 6 page Affidavit.)

Date <b>6/10/15</b>	Signed (Affiant) <i>[Signature]</i>
Jurat Subscribed and sworn to before me on (Date) <b>6/15/15</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <b>WESPECER</b> <i>[Signature]</i> <b>2257</b>
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Date <b>6/10/2015</b>
Reviewed (Judge/Judge Trial Referee) <i>[Signature]</i>	Date <b>6/15/15</b>