

State of Minnesota
County of Rock

District Court
5th Judicial District

Prosecutor File No.
Court File No.

18CR01154

State of Minnesota,

Plaintiff,

COMPLAINT

Summons

vs.

LISA B. RAINFORD-MOEDING DOB: 03/28/1979

311 Oak Drive
Luverne, MN 56156

Defendant.

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I

Charge: Insurance Fraud-Present False Representation/Conceals Facts-Claim for Payment

Minnesota Statute: 609.611.1(a)(2), with reference to: 609.52.3(2)

Maximum Sentence: Not more than 10 years, \$20,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 01/09/2017 to 08/30/2017

Control #(ICR#): 18001704

Charge Description: Between 1/1/2017 to 6/30/2017, within the County of Rock, defendant with the intent to defraud for the purpose of depriving another of property or for pecuniary gain, presented a claim for payment or benefit under an insurance policy which contained a false representation and totaled over \$5,000.

COUNT II

Charge: Insurance Fraud-Present False Representation/Conceals Facts-Claim for Payment

Minnesota Statute: 609.611.1(a)(2), with reference to: 609.52.3(2)

Maximum Sentence: Not more than 10 years, \$20,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 01/09/2017 to 08/30/2017

Control #(ICR#): 18001704

Charge Description: Between 7/1/2017 to 10/2/2017, within the County of Rock, defendant with the intent to defraud for the purpose of depriving another of property or for pecuniary gain, presented a claim for payment or benefit under an insurance policy which contained a false representation and totaled over \$5,000.

STATEMENT OF PROBABLE CAUSE

Your Complainant is a licensed peace officer in the State of Minnesota. In this capacity your Complainant believes the following to be true and correct.

Kristofer Carlson is a special agent with the Minnesota Commerce Fraud Bureau (CFB). In that capacity, Agent (SA) Carlson conducted a fraud investigation stemming from a referral from American Family Life Assurance Company (AFLAC).

On or about August 10, 2018, AFLAC submitted a report to the MN CFB detailing suspected insurance fraud committed by subject Lisa B. Rainford (Rainford), DOB: 03/28/1979. Rainford applied for a supplemental insurance policy from AFLAC on or about October 19, 2016. Rainford was granted coverage through AFLAC following her application submission.

Between January 2017 and October 2017, Rainford filed claims for injuries stemming from alleged accidents that occurred. AFLAC Special Investigations Unit (SIU) Investigator T. Rotthoff discovered through her own investigation that Rainford's claims were invalid. Following her discovery, SIU Rotthoff submitted a fraud referral to the CFB for criminal investigation.

Rainford is the mother of three daughters and shares custody of her three daughters with her ex-husband, Collin Rainford. Collin Rainford is the biological father of two of their daughters and is listed as the father of their third daughter on her birth certificate.

Rainford is currently unemployed. Rainford was previously employed as a chemical dependency counselor and as an employee with ShopKo in Luverne, MN.

Between January 2017 and October 2017, Rainford submitted numerous claims to AFLAC regarding treatment stemming from alleged accidents that occurred. Rainford submitted claims on behalf of her three daughters and herself. Rainford made claims on AFLAC policy # P0M2W0G5. Rainford submitted paperwork purportedly from several providers that documented treatment for the claimed accidents. The providers included Sanford Health, Stephen J. Morris, DDS (dental office), and Today's Family Dentistry.

On August 29, 2017, claims department specialist Katelyn Mille contacted Sanford Luverne Medical Center to verify treatment and treatment dates listed on one of Rainford's claims for benefits. Sanford Health medical records employee 'Kay' advised specialist Mille that the dates listed for treatment were invalid. Specialist Mille contacted Sanford Luverne Clinic to verify treatment and treatment dates for an ambulance transportation. Medical records employee 'Susie' advised Rainford hadn't received the specified treatment and the treatment date was invalid. Rainford's claims and file were forwarded to AFLAC's SIU Rotthoff.

SIU Rotthoff investigated all of the claims for benefits that Rainford submitted under her policy. SIU Rotthoff spoke with each of the providers Rainford listed in her claims. SIU Rotthoff reviewed treatment records and patient information with providers. SIU Rotthoff reviewed documents Rainford purported were from several Sanford Health facilities and two dental offices including Stephen Morris, DDS and Today's Family Dentistry. None of the claimed treatment dates discussed with providers existed. SIU Rotthoff discovered that one of the listed providers, Stephen Morris, DDS, hadn't seen Rainford's children as patients in their office. There were no patient records and no invoices for treatment because none was provided.

SIU Rotthoff organized all claims payments made to Rainford following her accident claims submissions. Based on Rainford's paperwork, SIU Rotthoff determined Rainford submitted fraudulent claims and was

paid over \$10,000 in benefits.

Upon conclusion of AFLAC's investigation, SIU Rotthoff initially sent Rainford a letter dated July 27, 2018 advising that she'd collected benefits based on invalid claims and owed AFLAC \$2,325.00 dollars. This amount was based on the confirmed invalid claims SIU Rotthoff investigated to date. Ultimately, SIU Rotthoff discovered all of the invalid claims after full review and sent out an updated letter on November 15, 2018 requesting repayment in the amount of over \$14,000 dollars. Rainford didn't respond to either request, nor responded to SIU Rotthoff's email and phone requests to discuss the invalid claims.

AFLAC submitted a fraud referral to the MN CFB which detailed their findings. SA Carlson was assigned the referral and initiated an investigation. SA Carlson requested and received the claim file and SIU Investigative file. AFLAC's file included a spreadsheet which separated valid claims and invalid claims submitted to AFLAC under Rainford's supplemental policy. The claims spreadsheet was updated following the initial referral submission, after all claims had been fully reviewed by SIU Rotthoff.

SA Carlson further learned that Rainford submitted claims to AFLAC through their website's electronic claim submission process. Rainford submitted over 100 claims between January 2017 and October 2017. Rainford submitted claims for numerous injuries treated at several providers including Sanford Health, Stephen Morris, DDS, and Today's Family Dentistry.

On October 24, 2018, SA Carlson met with Dr. Stephen Morris (Morris) and receptionist Sandy Harwick (Harwick) to discuss claims Rainford file regarding crown replacements for broken teeth to her children and her. SA Carlson first talked with Dr. Morris about his practice and his appointments with Lisa Rainford. SA Carlson documented his conversation with Dr. Morris in a report. The report included several attachments from Rainford's claims submissions and Morris' physical records.

Dr. Morris has been practicing dentistry for the past 44 years in Dawson, MN and has worked with Harwick at his office in Dawson, MN for the past 15 years. Dr. Morris' office keeps records for his patients and files those records under the patients' last names. There are no account numbers associated with patient records or files. Receptionist Harwick is responsible for filing records, submitting insurance claims, and keeping invoices and other documents for each patient. Dr. Morris had never heard of his office documents and paperwork being used for any fraudulent claims in the past.

SA Carlson and Dr. Morris reviewed Rainford's file(s). Rainford was not a regular patient with his office. Dr. Morris treated Rainford on April 11, 2017. During Rainford's April 11, 2017, visit, Dr. Morris performed routine, preventive care for Rainford including an initial exam, bitewings X-rays, fluoride treatment and prophylaxis (adult). Dr. Morris prescribed penicillin to Rainford for an infected tooth identified at the appointment as well.

Dr. Morris reviewed an Explanation of Benefits document and an office invoice Rainford submitted online to AFLAC claiming she'd broken a tooth and received a 'crown permanent tooth' from Dr. Morris. Dr. Morris denied treating Rainford for a broken tooth and verified the two documents were not produced or sent from their office. Dr. Morris printed a copy of the actual invoice provided to Rainford from their office. The two documents were not the same. Dr. Morris' office provides invoices produced from QuickBooks. The invoice submitted by Rainford to AFLAC was not produced by QuickBooks and listed an account for Rainford which didn't exist at Morris' office. The bill from Dr. Morris' office submitted to Blue Plus Advantage insurance was paid in full (documents are included in the Morris report).

Harwick reviewed Rainford's file with SA Carlson and provided copies of all documents and paperwork from the file to SA Carlson. SA Carlson's conversation was documented in a report. The file contained a

chart with a list of dates of service for Rainford. Rainford was seen on April 11, 2017, for a routine exam, seen on April 24, 2017, for a tooth extraction, and seen on July 13, 2017, for resin fillings in tooth #24 and tooth #25. Rainford failed to appear at her scheduled appointments on May 8, 2017, and October 24, 2017.

In Rainford's claims submissions, she alleged having tooth #30 extracted and receiving a permanent crown after breaking her tooth on April 11, 2017. According to X-rays on file taken at Morris' office, Rainford's tooth #30 was already missing prior to any extraction at his office on April 24, 2017. Furthermore, Rainford's tooth #28 was extracted on April 24, 2017 due to an abscess caused by infection. None of Rainford's submitted paperwork and documents matched paperwork contained in Morris' physical file.

Further review of records with Harwick revealed that none of Rainford's children were seen at their office. Rainford submitted several claims on behalf of her children noting broken teeth remedied by Dr. Morris with permanent crowns placed on those same teeth claimed broken. Not one of Rainford's children had been a patient of Dr. Morris nor had a file with Dr. Morris' office. All of Rainford's claims of treatment with Dr. Morris were materially misrepresented to the insurance company in order to collect benefits fraudulently.

On November 15, 2017, SA Carlson met with Sanford Health staff at Sanford Laverne Clinic in Laverne, MN. SA Carlson, Director of Ancillary Services Nancy Drenth (Drenth), and Release of Information manager Becky Uilk (Uilk) reviewed and discussed medical documents and records for treatment and care provided to Rainford and her children between January 2017 and September 2017. SA Carlson reviewed with Drenth and Uilk paperwork submitted by Rainford purported to be from various Sanford Health providers and locations. SA Carlson's conversation with Drenth and Uilk was documented in a report.

None of the listed services in the Sanford Health records matched any of the claims submitted by Rainford to AFLAC. All of Rainford's claims for treatment with Sanford Health were materially misrepresented to the insurance company in order to collect benefits fraudulently. Drenth, Uilk, and SA Carlson reviewed the children's Sanford Health dates of service for treatment and care. None of the Sanford Health records matched the treatment or care claimed by Rainford to AFLAC.

All of the documents submitted by Rainford to AFLAC were invalid and were not generated by or on behalf of Sanford Health. All of Rainford's claims for treatment of her children were materially misrepresented to the insurance company in order to collect benefits fraudulently.

On November 16, 2017, SA Carlson met with and spoke to Rainford's ex-husband, Collin Rainford. SA Carlson's conversation with Collin Rainford was documented in a report. Collin Rainford married Lisa Rainford in May 2006. In or around June 2012, Collin Rainford filed for a divorce which was finalized in or around January 2013. Collin Rainford and Lisa Rainford had three daughters while they were married.

Approximately a year and a half after their first daughter was born, Lisa Rainford informed Collin Rainford he was not the biological father. Collin Rainford was listed as the father on the birth certificate and continued to care for and insure all three daughters. Collin Rainford was ultimately granted shared custody of his daughters in or around June 2015. He sees and spends time with two of three daughters on a routine, weekly basis. For approximately the last two years, his eldest daughter has not spoken to or visited with Collin.

Collin has carried full medical, dental and vision (health) insurance for his daughters since his divorce. Collin's previous employer provided health insurance through a company called UMR. Collin Rainford periodically checked his insurance benefits and bills online. While checking bills and benefits online a couple years ago, he discovered over \$40,000 dollars listed in Explanation of Benefits for his three daughters for various medical visits. Collin Rainford was unaware that his daughters had seen any medical

doctors at the time for any illnesses or injuries, let alone been billed for such visits. Upon further inquiry with UMR Insurance, Collin Rainford discovered that his ex-wife, Lisa Rainford, accessed his health insurance account online and changed contact information and billing/receipt delivery to online only. Lisa Rainford changed the contact email to something similar to lbmoeding@gmail.com and changed the mailing address to her address in Beaver Creek, MN.

Collin Rainford and SA Carlson reviewed injuries and treatment Rainford claimed to AFLAC on behalf of their daughters. Collin Rainford confirmed that none of the children had broken their teeth nor had they had crown replacements for their teeth. Collin Rainford confirmed that two daughter had their tonsils removed, but hadn't had any other surgery or hospital stays. Collin Rainford confirmed that his daughters hadn't broken any bones in a scooter accident, a fall from a horse, or from falling off the monkey bars.

Collin informed SA Carlson that when he was previously married to Lisa Rainford, she'd been insured with AFLAC through her employer. Collin Rainford believed she was insured by AFLAC approximately 7-8 years ago. Rainford mentioned to Collin Rainford she could submit a claim for an accident to AFLAC and receive claims benefits in the form of cash. Collin Rainford believed Rainford had actually received monetary benefits at that time from AFLAC.

On November 15 and November 16, 2018, SA Carlson attempted contact with Rainford at her residence at 311 Oak Dr., Luverne, Rock County, MN 56156. SA Carlson observed a green 2014 Kia Soul in the driveway which registered to Rainford. SA Carlson observed the Kia Soul either in the driveway of the residence or in a shared parking lot directly to the south of the residence. SA Carlson also observed a white 1998 Pontiac Bonneville parked in the driveway of the residence during one attempt which registered to Rainford. SA Carlson overheard someone speaking inside the residence on several of his attempts, but ultimately SA Carlson was unable to make contact with anyone.

The tables below are analyses of claims submitted to AFLAC by Rainford:

LISA RAINFORD
DATE

PROVIDER LISTED
ACTUAL SERVICE
CLAIMED SERVICE
AMOUNT PAID
03/29/2017
Sanford Health/Morris Dental
Office visit/Swollen tooth (not trauma)
ER Visit/Broken tooth from trauma
\$120.00
4/11/2017
Morris Dental
Routine Dental Check-up
Tooth extraction/broken tooth from trauma
\$520.00
6/26/2017
Sanford Health
NONE
Maj. Diagnosis (F/U)/Fractured spine injury
\$400.00
6/27/2017
Sanford Health
NONE
ER Visit/Appliances/Fractured spine injury
\$445.00
6/28/2017
Sanford Health
NONE
Hospital stay/benefits/Fractured spine injury
\$1,250.00
7/05, 7/07, 7/10/2017
Sanford Health
NONE
Phys. Therapy/Fractured spine injury
\$105.00
7/12, 7/14, 7/17/2017
Sanford Health
NONE
Phys. Therapy/Fractured spine injury
\$105.00
7/19, 7/21, 7/23, 7/26/2017
Sanford Health
Prescription Refill
Phys. Therapy/Fractured spine injury
\$140.00
8/20/2017
Sanford Health
Prescription Refill
ER Visit/X-rays/Fractured hip and wrist injury
\$470.00

SHAYLA RAINFORD

2/22/2017
Sanford Health
NONE
Phys. Therapy/unknown injury (none listed)
\$35.00
2/28/2017
Sanford Health
NONE
Phys. Therapy/unknown injury (not listed)
\$35.00
3/02/2017
Sanford Health
NONE
Phys. Therapy
\$35.00
3/09/2017
Sanford Health
NONE
Phys. Therapy
\$35.00
3/29/2017
Sanford Health
NONE
Phys. Therapy/F/U Visit
\$35.00
4/04/2017
Sanford Health
NONE (email to doctor, no visit)
F/U Doc visit
\$35.00
5/05/2017
Sanford Health
Prescription Refill/Email to doctor
ER Visit/Hospital care/stay/Fractured leg injury
\$2,370.00
5/17, 5/19, 5/22, 5/24-5/26/2017
Sanford Health
Office visit re: anxiety (5/24/2017)
Phys. Therapy/Fractured leg injury
\$210.00
6/05, 6/12, 6/15, 6/21, 6/29/2017
Sanford Health
NONE (visiting Florida @ the time per email on 6/22/2017)
Phys. Therapy/Fractured leg injury
\$175.00
5/24/2017
Sanford Health/Morris Dental
Anxiety/Depression/Doc visit for med change
ER Visit/Crown placement/Broken tooth (tooth trauma)
\$555.00

AVA RAINFORD
 DATE
 PROVIDER LISTED
 ACTUAL SERVICE
 CLAIMED SERVICE
 AMOUNT PAID
 2/22/2017
 Morris Dental
 NONE
 ER Visit/Crown placement/broken tooth from trauma
 \$520.00
 4/10/2017
 Sanford Health
 NONE
 ER Visit/X-rays
 \$895.00
 4/13/2017
 Sanford Health
 NONE
 F/U Visit
 \$35.00
 4/13/2017
 Sanford Health
 NONE
 X-rays/MRI
 \$200.00
 4/14/2014
 Sanford Health
 NONE
 Hospital stay/care/F/U Visit/broken leg injury
 \$2,535.00
 5/08, 5/10, 5/12, 5/15/2017
 Sanford Health
 NONE
 Phys. Therapy/broken leg injury
 \$140.00
 5/17/2017
 Sanford Health
 NONE
 Phys. Therapy/broken leg injury
 \$35.00
 5/22/2017
 Sanford Health
 Office visit re: sore throat
 Phys. Therapy/broken leg injury
 \$35.00

6/12, 6/15, 6/21, 6/29/2017

Sanford Health

NONE

Phys. Therapy/broken leg injury

\$140.00

8/12/2017

Morris Dental

NONE

Crown placement/broken tooth from trauma

NONE PAID

TEAGAN RAINFORD

1/09/2017

Sanford Health/Morris Dental

NONE

ER Visit/Crown placement/broken tooth from trauma

\$555.00

3/15/2017

Sanford Health

Office visit re: ear infection/nasal congestion

ER Visit/Wrist injury

\$325.00

3/15/2017

Sanford Health

NONE

F/U Visit/wrist injury

\$35.00

7/23/2017

Sanford Health

NONE

ER/Doc Visit/broken left arm (fall from horse)

\$200.00

7/23/2017

Sanford Health

NONE

ER/Doc Visit/broken left arm (fall from monkey bars)

NONE

7/23/2017

Sanford Health

NONE

Hospital stay/care

\$1,945.00

Total Amount Paid to Lisa Rainford: \$14,670.00

SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant

Kris Carlson
Special Agent
85 7th Place East
Suite 100
St. Paul, MN 55101
Badge: 0113

Electronically Signed:
04/21/2021 02:55 PM
Anoka County, MN

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney

Jeffrey L Haubrich
Assistant County Attorney
120 N McKenzie
PO Box 538
Luverne, MN 56156
(507) 283-9111

Electronically Signed:
04/21/2021 02:37 PM

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

☒ SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear as directed in the Notice of Hearing before the above-named court to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

☐ WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

☐ *Execute in MN Only*

☐ *Execute Nationwide*

☐ *Execute in Border States*

☐ ORDER OF DETENTION

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$

Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: April 22, 2021.

Judicial Officer

Terry S Vajgrt
Judge

Electronically Signed: 04/22/2021 10:24 AM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF ROCK
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

Lisa B. Rainford-Moeding

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE

*I hereby Certify and Return that I have served a copy of this
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Lisa B. Rainford-Moeding
DOB: 03/28/1979
Address: 311 Oak Drive
Luverne, MN 56156

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender: FEMALE

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	1/9/2017	609.611.1(a)(2) Insurance Fraud-Present False Representation/Conceals Facts-Claim for Payment	Felony	U111G	N	MN062095Y	18001704
	Penalty	1/9/2017	609.52.3(2) Theft-Value over \$5,000 or Trade Secret, Explosive, Controlled Substance I or II	Felony	U111G	N	MN062095Y	18001704
2	Charge	1/9/2017	609.611.1(a)(2) Insurance Fraud-Present False Representation/Conceals Facts-Claim for Payment	Felony	U111G	N	MN062095Y	18001704
	Penalty	1/9/2017	609.52.3(2) Theft-Value over \$5,000 or Trade Secret, Explosive, Controlled Substance I or II	Felony	U111G	N	MN062095Y	18001704