

FILED
05-05-2026
Anna Maria Hodges
Clerk of Circuit Court
2026CF002103

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 26-CF-2103

DEBBIE LONG
9048 W FOREST HOME AVE,
MILWAUKEE, WI 53228
DOB: 02-12-1982,

Defendant.

AMENDED CRIMINAL COMPLAINT

The Wisconsin Department of Justice, pursuant to its authority under Wis. Stat. § 49.846(2), files this criminal complaint against Debbie Long (DOB: 02-12-1982).

Debbie Long¹ was an owner and the administrator of Pinnacle Home Health Care, LLC (Pinnacle). The State alleges that she defrauded Wisconsin Medicaid of almost \$2.2 million by billing for personal care services which did not take place.

Furthermore, Long fraudulently obtained a \$219,072 loan from the Paycheck Protection Program by inflating the size of Pinnacle's workforce and payroll expenses.

¹ The defendant's maiden name is Lewis, and she often went by "Debbie Lewis" or "Deb Lewis." For clarity and consistency, this complaint will use her married name even when referring to documents or witness statements that use her maiden name.

Lastly, the State alleges that Long used the proceeds from her unlawful activities to purchase a restaurant, a car, and a car wash. As for the purchase of the car and car wash, Long helped funnel her ill-gotten gains through several shell companies in a series of transactions designed to conceal the origin of the funds.

Count 1
THEFT BY FRAUD
GREATER THAN \$100,000

On or between approximately March 13, 2017, and August 12, 2022 , in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Debbie Long, did obtain title to property of another person by intentionally deceiving the person with a false representation which was known to be false, made with intent to defraud, which did defraud the person to whom it was made, the value of which property exceeded \$100,000, belonged to the same owner, and was obtained pursuant to a single intent and design and in execution of a single deceptive scheme, contrary to Wis. Stat. §§ 943.20(1)(d), (3)(cm), and 971.36(3)(a).

Pursuant to Wis. Stat. § 939.50(3)(f), upon conviction for this offense, a Class F felony, the defendant may be fined not more than \$25,000, or imprisoned not more than twelve years and six months, or both.

Count 2
FRAUD AGAINST A FINANCIAL INSTITUTION
GREATER THAN \$100,000

On or about May 8, 2020, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Debbie Long, did obtain money, funds, credits, assets, securities, or other property owned by or under the custody or control of a financial

institution by means of false pretenses, representations, or promises where the value of the money exceeded \$100,000, contrary to Wis. Stat. §§ 943.82(1) and 943.91(5).

Pursuant to Wis. Stat. § 939.50(3)(e), upon conviction for this offense, a Class E felony, the defendant may be fined not more than \$50,000, or imprisoned not more than fifteen years, or both.

Count 3
WIRE FRAUD AGAINST A FINANCIAL INSTITUTION

On or about May 5, 2020, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Debbie Long, did transmit or cause to be transmitted electrically, electromagnetically, or by light any signal, writing, image, sound, or data for the purpose of committing a financial crime, contrary to Wis. Stat. § 943.90.

Pursuant to Wis. Stat. § 939.50(3)(h), upon conviction for this offense, a Class H felony, the defendant may be fined not more than \$10,000, or imprisoned not more than six years, or both.

Count 4
MONEY LAUNDERING GREATER THAN \$100,000

On or about August 28, 2020, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Debbie Long, did knowingly conduct a transaction involving proceeds that the defendant knew were derived from unlawful activity, and the total value of the proceeds exceeded \$100,000, contrary to Wis. Stat. §§ 943.895(2)(a)1 and (3)(e).

Pursuant to Wis. Stat. § 939.50(3)(f), upon conviction for this offense, a Class F felony, the defendant may be fined not more than \$25,000, or imprisoned not more than twelve years and six months, or both.

Count 5
MONEY LAUNDERING GREATER THAN \$100,000
PARTY TO A CRIME

On or between approximately March 5, 2020, and December 23, 2020, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Debbie Long, did knowingly conduct a transaction involving proceeds that the defendant knew were derived from unlawful activity that was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds obtained through unlawful activity, the total value of the proceeds exceeded \$100,000, and the violations were pursuant to a single intent and design, contrary to Wis. Stat. §§ 943.895(2)(a)4.a., (2)(c), and (3)(e).

Furthermore, under Wis. Stat. § 939.05, the defendant may be charged and convicted of the commission of the crime by directly committing the crime, by intentionally aiding and abetting the crime, or by being a party to a conspiracy with another to commit the crime or advising, hiring, counselling or otherwise procuring another to commit the crime.

Pursuant to Wis. Stat. § 939.50(3)(f), upon conviction for this offense, a Class F felony, the defendant may be fined not more than \$25,000, or imprisoned not more than twelve years and six months, or both.

Facts Constituting the Charged Offenses

I, the Complainant, am an Investigator with the Wisconsin Department of Justice, Medicaid Fraud Control and Elder Abuse Unit (MFCEAU). MFCEAU investigates and prosecutes civil and criminal offenses related to Medicaid providers and entities that receive Medicaid funding. 42 C.F.R. § 1007.11.

I base this complaint upon my investigation, my training and experience and my review of business and State records. I have found business and State records to be reliable in the past.

This case was also investigated by Special Agents Ken Folkers and David Hall of the Division of Criminal Investigation at the Wisconsin Department of Justice, Detective Brian Wallender of the Greenfield Police Department, and Data Analyst Amber Dieter of MFCEAU. Special Agent Folkers conducted all the witness interviews either alone or with Detective Wallender. As Special Agents Folkers and Hall, Detective Wallender, and Analyst Dieter are all involved in law enforcement, I consider them to be reliable and trustworthy.

The identities of the witnesses are known to me, and they are identified in this complaint by pseudonyms.

This complaint contains a summary of facts necessary to establish probable cause; it does not contain all facts related to the investigation.

Based upon information and belief, I state:

Background

Wisconsin Medicaid is a joint federal and state program that provides medical coverage to indigent Wisconsin residents and is administered by the Wisconsin Department of Health Services (DHS). Residents that receive coverage from Wisconsin Medicaid are called “members.”

Pinnacle Home Health Care, LLC (Pinnacle) provided “personal care services” to Medicaid members. “Personal care services” are “medically oriented activities related to assisting a recipient with activities of daily living” so that members may continue to live in their home and community. Wis. Admin. Code DHS § 107.112(1)(a). Personal care services may include assistance with bathing, getting in and out of bed, mobility and ambulation, skin care, toileting, dressing and undressing, and meal preparation. Wis. Admin. Code DHS § 107.112(1)(b). A worker who provides personal care services is called a “personal care worker” (PCW).

At all times relevant to this complaint, Debbie Long was an owner and the administrator of Pinnacle. Moreover, Pinnacle was located, and Long resided in, the city of Milwaukee, Milwaukee County, Wisconsin.

Payment from Wisconsin Medicaid to Pinnacle

To receive compensation from Wisconsin Medicaid, Pinnacle submitted claims for reimbursement to DHS via the online ForwardHealth Portal or submitted the claims through a Health Maintenance Organization (HMO). *See* Wis. Admin. Code DHS § 106.03. A claim for reimbursement may seek reimbursement for different services for different Medicaid members on different days. But each individual service for each individual member is denoted by its own individual detail line within the

claim for reimbursement and contains the member's Medicaid identification number, the procedure code, the number of units, and the charge amount. *See* Wis. Admin. Code DHS §§ 106.03(2), 108.02(4).

Pinnacle was responsible for the truthfulness and accuracy of its reimbursement claims. Wis. Admin. Code DHS § 106.03(2)(c).

Medicaid providers cannot receive reimbursement for services that were never performed or for expenses that were never incurred. *See* Topic #516 in the Personal Care Section of the ForwardHealth Online Handbook for BadgerCare Plus and Medicaid.²

Pinnacle's Scheme to Defraud Wisconsin Medicaid

An analysis of Pinnacle's claims for reimbursement and the witness interviews show that Pinnacle committed widespread fraud against Wisconsin Medicaid by submitting fraudulent claims for reimbursement.

From March 13, 2017, to August 12, 2022,³ Pinnacle was paid approximately \$8,277,000 in connection with approximately 204,222 detail lines. An analysis of approximately 31,825 of those detail lines indicates that Pinnacle defrauded Wisconsin Medicaid of at least \$2.1 million during that time for services that were never performed.

Pinnacle used several methods to commit this fraud.

² All subsequent references to a specific topic number refer to a topic in the Personal Care Section for BadgerCare Plus and Medicaid in the ForwardHealth Online Handbook, <https://www.forwardhealth.wi.gov/WIPortal/Subsystem/KW/Display.aspx?ia=1&p=1&sa=47>.

³ There are three important dates for a claim for reimbursement: (1) the date that the service was provided, (2) the date that the claim was submitted for payment, and (3) the date that the claim was paid. For clarity and consistency, this complaint only refers to the date that the claim was paid.

Method #1: Billing for Impossible or Improbable Hours of Service

The procedure code for personal care services is T1019, and each unit of that code accounts for 15 minutes of personal care services. *See* Topic #2481. Thus, there are four units in an hour and a maximum of ninety-six units in a day.

Pinnacle was paid approximately \$750,752 for personal care services in connection with individual detail lines that claimed that a PCW performed more than ninety-six units of personal care services in a day for one member, which is impossible. For example, Pinnacle submitted one claim (which was paid) for 54,200 units (which is equal to 13,550 hours) of personal care services in one day for one member.

Pinnacle was also paid approximately \$819,994 in connection with individual detail lines that claimed a PCW performed 48 units of personal care services or more (i.e., 12 hours and above) in one day for one member. This amount of service, given the hands-on nature of personal care service, is highly improbable.

In total, Pinnacle was paid more than \$1.57 million in connection with claims for personal care services that were either impossible or improbable.

Method #2: Billing for Services When No Services Were Ever Rendered

Pinnacle was paid approximately \$141,397 for services that the PCW, in an interview, said he or she never provided.

Likewise, Pinnacle was paid approximately \$14,006 for services that the PCW could not have provided because the PCW said that he or she did not even know the member.

In addition, Pinnacle was paid approximately \$92,569 for services that the member said he or she never received.

In total, Pinnacle was paid in excess of \$247,000 for services that either the PCW or the member said never took place.

Method #3: Billing for Services in Excess of Those That Were Rendered

Pinnacle was paid approximately \$67,198 for claimed services that the member, in an interview, said were more than the services that were rendered by the PCW.

In a similar vein, Pinnacle was paid approximately \$62,223 for claimed services that the PCW said were more than the services that he or she provided.

In total, Pinnacle was paid in excess of \$129,000 for claimed services that were more than the services that were rendered.

Method #4: Billing While the Member was in the Hospital or Incarcerated

Medicaid does not reimburse personal care services if the member is in the hospital. Wis. Admin. Code DHS §§ 107.03(18), 107.112(4)(a). Medicaid also does not reimburse personal care services if the member is incarcerated. Wis. Admin. Code DHS § 107.03(13)–(15).

In total, Pinnacle was paid in excess of \$28,000 for personal care services that were purportedly provided while the member was either in the hospital or was incarcerated.

Method #5: Billing for Misrepresentation of Need

Pinnacle was paid in excess of \$219,000 for services where the interview with the member revealed that the member's need for services was misrepresented.

For example, Pinnacle stated that one member lived alone, which increased the level of services that the member qualified for, when the member actually lived with two PCWs. For another member, a child, the level of services was not supported by medical records or an Individual Education Plan from school.

Method #6: Billing for Travel Expenses That Were Never Incurred

In addition to personal care services, Pinnacle could seek reimbursement for travel expenses incurred by PCWs travelling from their home to the home of the member. See Topics #2481 and 2485. Witness interviews and claims analysis, however, indicates that Pinnacle sought reimbursement for travel expenses that the PCW never incurred because the PCW lived with the member.

In total, Pinnacle was paid in excess of \$43,000 for travel expenses the PCW never incurred.

Payroll Analysis

In addition to the claims data and witness interviews, a comparison between Pinnacle's payroll expenses and its reimbursement claims supports that Pinnacle committed widespread fraud against Wisconsin Medicaid. Otherwise, if its claims were legitimate, then Pinnacle paid its workers far less than the federal and state minimum wage of \$7.25 per hour. 29 U.S.C. § 206(a)(1)(C); Wis. Stat. § 104.035(1)(a).

From March 13, 2017, to August 12, 2022, Pinnacle sought reimbursement for 628,019.5 hours of claimed personal care services.⁴ During that same time, Pinnacle reported to the Wisconsin Department of Workforce Development (DWD) that it paid \$2,578,972.74 in total wages to its employees. *See* Wis. Stat. § 108.205; Wis. Admin. Code DWD § 111.02. So, if both figures are accurate, then Pinnacle paid its employees an average of \$4.10 per hour.

The disparity between claimed personal care services and wages is even more stark when examining Pinnacle's bank accounts for potential payroll expenses. (Pinnacle had seven bank accounts spread out across three banks.) After totaling all checks that appeared to be for payroll expenses (i.e., something about payroll was written in the memo line or it was a check to an employee) and cash withdrawals (which *might* have been for payroll), I identified \$1,870,086.17 as possible payroll expenses. Using that as the total payroll amount, and assuming that Pinnacle's reimbursement claims were accurate, then Pinnacle paid its employees an average of \$2.98 per hour.

Put simply, Pinnacle's lack of payroll expenses in comparison with its claims for reimbursement undercuts the legitimacy of those claims. After all, if Pinnacle performed all the personal care services it claimed, then attracting and maintaining a workforce while paying far less than minimum wage would have been both illegal and nearly impossible.

Red Dot Real Estate & Housing Program

⁴ Since each unit of personal care services accounts for 15 minutes of service, the total hours of personal care services can be determined by dividing the total claimed units by four. *See* Topic #2481.

Before summarizing some of the interviews with PCWs and members associated with Pinnacle, it is important to note that many of them referred to the Red Dot Real Estate & Housing Program (Red Dot).

Although the name suggests that the Red Dot is a charity or government program, it is really a shell company controlled by Debbie Long.⁵ Wisconsin Department of Financial Institutions (DFI) records indicate that its principal office is located at 4330 South 38th Street in Greenfield, Wisconsin, which was Debbie Long's home address. Furthermore, Red Dot had accounts at three different banks (Educator's Credit Union, US Bank, and BMO Harris Bank), and Debbie Long was the sole authorized user for all the accounts except for a checking account at BMO Harris Bank (BMO Harris). For that account, no. XXXXXX9624, no money was withdrawn from the account during the alleged course of conduct, and the only banking activity of note was a \$200,000 deposit on August 31, 2020, from the Levi Day Memorial Trust, which, as will be explained further below, was another shell company controlled by Debbie Long.

Member Interviews

PCW 1

According to DHS records, PCW 1 provided care to Member 1. During an interview, PCW 1 said that she started working for Pinnacle after she saw an

⁵ Charitable organizations must register with the Wisconsin Department of Financial Institutions (DFI) before soliciting contributions in Wisconsin. Wis. Stat. § 202.12(1)(a). Red Dot has never registered with DFI as a charitable organization.

advertisement and contacted the manager “Deb.” PCW 1 said that “Deb” is a black female.

PCW 1 said that “Deb” assigned her to work at a group home occupied by four males. PCW 1 said that she worked seven to eight hours per shift and completed a daily log that was ultimately given to “Deb.” PCW 1 said that she worked for Pinnacle for a couple months at the group home, left, then came back and worked a couple more months.

PCW 1 was asked whether she provided care to Member 1. PCW 1 said that she did not recognize Member 1’s name. Detective Wallender then showed PCW 1 a picture of Member 1, and PCW 1 said that she did not know the person in the photograph.

In a subsequent interview, PCW 1 was shown numerous documents related to her employment that were given to DHS, including her employment application, employee orientation, and a performance review. PCW 1 said that she did not recognize the signature that purportedly belonged to her on any of the documents.

PCW 1 was also shown signed timesheets regarding her purported care of Member 1. PCW 1 denied signing any of the timesheets and reiterated that she does not know Member 1.

Altogether, Pinnacle was paid \$10,921.80 by Wisconsin Medicaid for PCW 1’s purported care of Member 1.

PCW 2

DHS records indicate that PCW 2 provided personal care services to Members 2 and 3.

PCW 2 said she worked for Pinnacle for three months in 2017 and provided personal care to her neighbor, Member 2. PCW 2 said she worked six hours a day, Monday through Friday. Pinnacle, however, continued to submit timesheets on into 2018.

During the interview, PCW 2 never mentioned providing care to Member 3.

In total, Pinnacle was paid \$17,154.42 for care allegedly provided to Member 2 by PCW 2 after PCW 2 quit providing such care. Pinnacle was also paid \$19,274 for care to Member 3.

Member 4

DHS records show that Member 4 received personal care services from Pinnacle. In an interview, Member 4 denied ever receiving personal care services from Pinnacle (or any other agency). Member 4 said he knew Debbie Long because he had a child with her sister.

Pinnacle was paid \$15,874 for personal care services that were purportedly provided to Member 4.

PCW 3 and Member 5

Member 5 received personal care services from his wife, PCW 3. Member 5 said that his wife was paid by Pinnacle for her care services until DHS initiated a payment suspension.

SA Folkers and Detective Wallender later visited Pinnacle's office at 6815 West Capitol Drive in Milwaukee. They observed that there were timesheets in an open folder outside of the office door. There were nine timesheets regarding PCW 3's care for Member 5, and all of them contained the signatures of PCW 3 and Member 5. None of the timesheets indicated that PCW 3 incurred travel expenses, which makes sense since they lived together as a married couple.

In a later interview, Member 5 said that he and PCW 3 continued to turn in timesheets to Pinnacle in the hope of PCW 3 being paid again at some point.

Despite PCW 3 never incurring travel expenses while caring for her husband, Member 5, Pinnacle received \$11,745 in reimbursements from Wisconsin Medicaid for travel expenses.

PCW 4 and Member 6

Member 6 told SA Folkers that he was introduced to Pinnacle after requesting information about housing resources from the Red Dot. Member 6 said that he subsequently received a \$15 gift card, hygiene products, and a list of potential housing.

Member 6 said that Debbie Long owned Pinnacle.

Member 6 said he received personal care services from PCW 4, his cousin, through Pinnacle, for less than a year. Member 6 said that he left Pinnacle after it stopped paying PCW 4.

PCW 4 said that after she quit working with Pinnacle, she was contacted by a person from Pinnacle and was told that "services are back active." PCW 4 said she

had no further communication with Pinnacle and did not turn in any more timesheets after her last payment on January 17, 2020.

Nevertheless, Pinnacle was paid \$8,425 for personal care services that supposedly took place after both Member 6 and PCW 4 said they ended their association with Pinnacle.

PCW 5 and Member 7

PCW 5, through Pinnacle, provided services to her son, Member 7. PCW 5 stopped submitting timesheets to Pinnacle after PCW 5 was informed that Pinnacle was being audited by the state.

However, Pinnacle continued to submit claims for PCW 5's services after PCW 5 stopped submitting timesheets. In total, Pinnacle was paid \$16,920 for personal care services after PCW 5 stopped submitting timesheets.

PCW 6 and Member 8

Member 8 received personal care services through her daughter, PCW 6. Member 8 said she learned about Pinnacle after receiving a flyer in the mail. Member 8 also said that she was part of the Red Dot. Member 8 said she picked up \$100 in cash at Pinnacle's office as part of Red Dot. Member 8 said the money helped with her rent, and it was the reason that she decided to receive care through Pinnacle.

Member 8 further said that she stopped receiving care through Pinnacle about two years prior to the interview, which took place on February 10, 2022. PCW 6 said that she provided two hours of personal care service a day to Member 8 and that they have not been with Pinnacle for almost three years.

Overall, Pinnacle was paid \$47,698.04 for services that were billed after Member 8 and PCW 6 stopped working with Pinnacle or for services that were billed in excess of two hours per day.

PCW 7 and Member 9

DHS records show that Pinnacle billed for services on behalf of PCW 7 and Member 9. Member 9 said he met with Debbie Long to fill out and sign paperwork. Member 9 also said that Long came to his house, but he was never told that he was approved for care services with Pinnacle. Member 9 said, "I got nothing."

Likewise, PCW 7 said that she planned on providing care to Member 9, but Member 9 was never approved for care services with Pinnacle. PCW 7 denied ever providing care services to Member 9 and denied ever being paid by Pinnacle.

In total, Pinnacle was paid \$32,593.42 for PCW 7's "services" to Member 9.

PCW 8 and Member 10

PCW 8 provided care to his son, Member 10. PCW 8 said he provided care for a year or two and left Pinnacle in the summer of 2019.

Pinnacle was paid \$8,886.37 for services that PCW 8 ostensibly provided after he quit.

PCW 9 and Member 11

PCW 9 provided care to her daughter, Member 11. PCW 9 said she worked with Pinnacle from 2016 until December 4, 2020. PCW 9 said she did not turn in any timesheets after her last paycheck and that she never documented travel time as she lived with her daughter.

Pinnacle was paid \$15,767.20 in travel reimbursements for PCW 9.

Member 12

Member 12 said that she received care from Pinnacle from 2017 through 2019. Prior to receiving care through Pinnacle, Member 12 met with Debbie Long, and Long told her about Red Dot. Member 12 said that Red Dot was a financial program to help adults with disabilities. Member 12 was paid \$100 per month to help buy personal items. Member 12 said she received personal checks from Long.

Member 12 also said that her PCW provided care three times a week. DHS claims data, however, shows that Pinnacle claimed to have provided personal care services for seven days a week.

Pinnacle was paid \$66,774.61 for personal care services in excess of what Member 12 said was rendered.

PCW 10 and Member 13

PCW 10 said that she provided personal care to Member 13 before PCW 10, eventually, needed personal care services for herself. PCW 10 also said that Member 13 lives at her residence.

DHS claims data shows that Member 13 received care services from Pinnacle from April 12, 2017, to December 6, 2020. PCW 10, however, said that she was unaware of Member 13 receiving any personal care services after PCW 10 started receiving personal care services from Pinnacle on March 21, 2018.

Pinnacle was paid \$111,482.63 for personal care services and travel expenses related to Member 13 that never occurred.

Member 14

Member 14 said he received personal care services from Pinnacle for just one month. Pinnacle, however, submitted claims for reimbursement over the course of ten months.

Pinnacle was paid \$20,184.96 for personal care services that it ostensibly provided over an additional nine months.

Member 15

Member 15 said she received personal care services, for twelve hours a day, from Pinnacle from 2019 through 2020. Nevertheless, Pinnacle continued to bill for personal care services for Member 15 after 2021, and also billed for more than twelve hours of care in a day.

Pinnacle was paid \$1,712.94 for fraudulent claim submissions in connection with Member 15.

Member 16

Member 16 told SA Folkers that he started receiving personal care services through Pinnacle in 2018 and was only with Pinnacle for a year. Pinnacle, however, continued to submit claims for reimbursement regarding Member 16 into 2021.

Pinnacle was paid \$29,974.36 for claims for reimbursement that took place after Member 16 said he stopped receiving care through Pinnacle.

Debbie Long Submitted Fraudulent Claims for Reimbursement to DHS

As recounted below, several factors show that Debbie Long was responsible for the fraudulent claims that Pinnacle made to DHS and to HMOs.

Debbie Long Ran Pinnacle

According to records from DFI, Debbie Long filed articles of incorporation to organize Pinnacle as a limited liability company in January 2015. Long also listed herself as the registered agent and as an organizer (with an additional person listed as an organizer). After incorporating the business, Long filed all of Pinnacle's annual reports with DFI.

Long also held herself out as the administrator of Pinnacle in all interactions with DHS, with Health Maintenance Organizations (HMOs), and in hearings before the Division of Hearings and Appeals (DHA).

Furthermore, as was explained above, interviews with witnesses show that Long oversaw Pinnacle's day-to-day operations.

Debbie Long Had the Ability to Submit Claims for Reimbursement

As mentioned above, Pinnacle had to submit claims for reimbursement to DHS through the online ForwardHealth Portal. *See* Wis. Admin. Code DHS § 106.03. But before someone can submit a claim through the portal, that person must register for an account.

Records obtained from DHS show that Debbie Long had an active administrator account and was, therefore, able to submit claims for reimbursement through the ForwardHealth Portal. That said, four other people had clerk accounts and could also submit claims. The other organizer listed in Pinnacle's articles of incorporation did not have an account.

Debbie Long Controlled Pinnacle's Bank Accounts

As mentioned above, Pinnacle had seven bank accounts spread out across three banks. Four of the accounts (two checking accounts and two money market accounts) were at BMO Harris Bank (BMO Harris), two (both checking accounts) were at Educator's Credit Union (Educator's), and one (a checking account) was at US Bank. According to the signature cards from these banks, Debbie Long was the sole authorized user for six of the seven accounts.

For the Pinnacle account that had another authorized user, BMO Harris money market acct. no. XXXXXX0290, Long appears to be the sole user. The account was largely funded by a transfer from BMO Harris money market acct. no. XXXXXX2919 (which Long controlled) and a check from DHS to Pinnacle (which Long ran). Long also transferred money out of the account because her signature appears on cashier's checks and cash withdrawal slips for the account.

In addition, the records from the banks show that Long, on numerous occasions, traveled to bank branches to make cash withdrawals, deposits, or to take out cashier's checks.

Debbie Long Benefitted from Large Purchases That Were Made Using Fraudulently Obtained Funds

As will be explained in more detail below, Debbie Long purchased Kitt's Custard and helped launder the money that was used to purchase a luxury car and a car wash. Even if her husband was the purchaser of the car and car wash, Long acquired a one-half interest in both because Wisconsin is a marital property state. Wis. Stat. § 766.31(3).

Paycheck Protection Program

In addition to using Pinnacle to defraud the federal and state government through the Medicaid program, during the same timeframe Long used Pinnacle to defraud the federal government through the Paycheck Protection Program (PPP).

PPP was created by Congress to curb the economic disruption from the coronavirus pandemic by providing low-interest loans to businesses to pay for operating expenses and employee compensation. *See* 15 U.S.C. § 636(a)(36)(F)(i). PPP was administered by the Small Business Administration, which relied on private lenders to process loan applications.

In the application, applicants had to assert, in part, that “the uncertainty of current economic conditions makes necessary the loan request to support the ongoing operations of the eligible recipient,” and that “funds will be used to retain workers and maintain payroll or make mortgage payments, lease payments, and utility payments.” 15 U.S.C. § 636(a)(36)(G)(i). The maximum loan amount was based on a 2.5 multiplier of the business’s monthly payroll costs. 15 U.S.C. § 636(a)(36)(E).

Debbie Long Submitted a Fraudulent PPP Loan Application

In May 2020, Debbie Long applied for a PPP loan for Pinnacle. In the application, Long claimed that Pinnacle had 120 employees and had an average monthly payroll of \$87,629. Long also provided the private lender, BMO Harris, with a purported payroll summary for 2019 to support her claims regarding Pinnacle’s monthly payroll costs.

Application records show that Long applied for the loan through an online platform, uploaded the 2019 payroll summary to the platform, and e-signed the application using DocuSign on May 5, 2020.

Long listed Pinnacle's address and her home address on the application. Both are in the city of Milwaukee, Milwaukee County, Wisconsin.

As part of the application, Long certified that Pinnacle "was in operation on February 15, 2020 and had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on Form(s) 1099-MISC," that she understood "that if the funds are knowingly used for unauthorized purposes, the federal government may hold me legally liable, such as for charges of fraud," and that "the information provided in this application and the information provided in all supporting documents and forms is true and accurate in all material respects."

Based on Long's representations, BMO Harris approved a \$219,072 PPP loan for Pinnacle at an interest rate of 1 percent. The proceeds of the loan were deposited into a BMO Harris checking account for Pinnacle, acct. no. XXXXXX7723, on May 8, 2020. Long was the sole authorized user of the account.

Long's claims about Pinnacle's workforce and payroll expenses, however, are directly contradicted by the information Pinnacle provided to the Wisconsin Department of Workforce Development (DWD) for the same timeframe. Like all employers in Wisconsin, Pinnacle had to submit quarterly wage reports to DWD. Wis. Stat. § 108.205; Wis. Admin. Code DWD § 111.02. The wage reports included the

names, social security numbers, and wages paid to each employee during the quarter.
Id.

According to Pinnacle's wage reports, during the second quarter of 2020—when Long applied for the PPP loan—Pinnacle had 46 employees (not 120) and paid \$108,350.37 in wages, which means the average monthly payroll was \$36,116.79 (not \$87,629).

Pinnacle's wage reports also undercut the 2019 payroll summary provided by Long to BMO Harris. During the first quarter of 2019, Pinnacle reported to DWD that it had 100 employees and a payroll of \$247,741.18 (i.e., an average monthly payroll of \$82,580.39). During the second quarter, Pinnacle reported having 88 employees and a reported payroll of \$224,778.57 (i.e., an average monthly payroll of \$74,926.19). For the third quarter, Pinnacle claimed it had 87 employees and a payroll of \$244,707.40 (i.e., an average monthly payroll of \$81,569.13). For the fourth quarter of 2019, Pinnacle reported having 77 employees and a payroll of \$199,577.27 (i.e., an average monthly payroll of \$66,525.76).

Furthermore, BMO Harris records for acct. no. XXXXXX7723 do not show any banking activity consistent with paying \$87,629 for payroll or business expenses on a monthly basis. In fact, between May 2020 and September 2020, the largest withdrawal, by far, was \$176,000 on June 26, 2020. On that date, Long withdrew \$1,000 in cash and took out a cashier's check for \$175,000 to 7 Elite Medical Supply, LLC.

7 Elite Medical Supply, LLC (later renamed 7 Elite Construction Management, LLC) was a company that was run, in part, by Long's husband. Because Pinnacle was a personal care agency, and would have little need for medical supplies, it does not appear that this payment was for a legitimate business expense.⁶

Moreover, after reviewing Pinnacle's bank records from all seven accounts from May 2020 through August 2020, and totaling all checks that appeared to be for payroll expenses (i.e., something about payroll was written in the memo line or it was a check to an employee) and cash withdrawals (which *might* have been for payroll), I identified \$54,495.16 in possible payroll expenses. Calculated in this fashion, the average monthly payroll was \$13,623.79 from May 2020 to August 2020.

In summary, Debbie Long inflated Pinnacle's workforce and payroll expenses to receive a larger PPP loan. Even more, as will be explained below, Long did not use the money exclusively for payroll or business expenses as required.

Debbie Long Purchased Kitt's Frozen Custard Using the Fraudulent PPP Loan and Fraudulent Reimbursements from Wisconsin Medicaid

Debbie Long used money from the PPP loan and reimbursements from Wisconsin Medicaid to purchase Kitt's Frozen Custard (Kitt's).

Kitt's is located at 7000 West Capitol Drive in Milwaukee.

Debbie Long purchased Kitt's on August 28, 2020, through two transactions. In one transaction, Long used a cashier's check for \$18,747.79 to pay to the owner. The cashier's check was drawn on BMO Harris acct. no. XXXXXX2900, which is a

⁶ As will be explained in further detail below, 7 Elite Medical Supply/7 Elite Construction Management was a shell company used to launder money.

checking account for Pinnacle. In the other transaction, Long initiated a wire transfer of \$691,033.73 to the owner. The funds for the wire transfer were drawn from acct. no. XXXXXX7723, which is the same checking account that received the funds from the PPP loan.

An analysis of acct. no. XXXXXX7723 by Analyst Dieter shows that Long used the PPP loan to pay for Kitt's because she would not have been able to fully fund the wire transfer on August 28, 2020, without it. On May 7, 2020 (the day before the PPP loan money was deposited in the account), the account's balance was \$533,590.93. From May 7th until the purchase of Kitt's on August 28th, the account received \$167,940.79 from Wisconsin Medicaid, and Long deposited \$131,136.72, for a total cash inflow of \$299,077.51. During the same period, Long withdrew \$239,341.61, transferred \$115,055.12, and paid \$5,343.71 for various fees and payments, for a total cash outflow of \$359,740.44. Thus, there was a negative net cash flow of \$60,662.93 from the day before the PPP loan money entered the account until Long purchased Kitt's. Therefore, without the \$219,072 PPP loan, the account would have had a balance of \$472,928, and Long would have been unable to fund the \$691,033.73 wire transfer on August 28, 2020.

In addition, Long would not have been able to fund the wire transfer without the reimbursements from Wisconsin Medicaid. When the PPP loan (\$219,072) is added to the balance from May 7, 2020 (\$533,590.93), the balance on May 8, 2020 becomes \$752,662.93. Without the reimbursements from Wisconsin Medicaid (\$167,940.79), the total cash inflow was just \$131,136.72 from May 7, 2020, to August

28, 2020, and the total cash outflow remains the same (\$359,740.44). So, the account would have had a negative net cash flow of \$228,603.72. Therefore, without the Medicaid reimbursements, the account balance would have been \$524,059.21 on August 28, 2020, and Long would have been unable to fund the \$691,033.73 wire transfer.

Thus, both the fraudulent PPP loan and the fraudulent reimbursements from Wisconsin Medicaid were essential to Long's purchase of Kitt's.

Long Helped Funnel Fraud Proceeds Through Three Shell Companies to Purchase a Mercedes Benz and an Octopus Car Wash

The acquisition of Kitt's was not the only purchase that Long participated in that involved money derived from fraud. Long also helped direct money, obtained from her scheme to defraud Wisconsin Medicaid, from Pinnacle through three shell companies and her own bank accounts to fund the purchase of a Mercedes Benz AMG S63 and an Octopus Car Wash. Long, along with her husband, moved the money around through numerous transactions designed to conceal the origin, ownership, and control of the proceeds.

The Shell Companies

The three shell companies used by Long and her husband were 7 Elite Construction Management, LLC (7 Elite Construction),⁷ 7 Global Properties, LLC

⁷ According to DFI records, on June 22, 2020, 7 Elite Medical Supply, LLC, changed its name to 7 Elite Construction Management, LLC. The name change, which suggests an inexplicable shift in business practices, also supports that it was a shell company.

(7 Global), and the Levi Day Memorial Trust. All three appear to be shell companies for several reasons.

First, from looking at the bank records for the entities, none of them carried on any significant business activities. There are no clear payroll or business expenses. The withdrawals from these accounts are primarily either large cash withdrawals or are point of sale purchases for personal expenses.

Second, none of these companies ever paid state or federal income taxes. In fact, none of these companies even had a Federal Employer Identification Number or a Federal Tax Identification Number, which is assigned by the Internal Revenue Service for tax reporting.

Lastly, none of these companies ever filed a wage report with DWD, which would indicate that none of these companies ever had any employees despite each having millions of dollars in cash flow. *See Wis. Stat. § 108.205; Wis. Admin. Code DWD § 111.02.*

Bank Accounts

In addition to the bank accounts for Pinnacle, Debbie Long controlled the bank account for the Levi Day Memorial Trust and her own accounts.

Her husband was an authorized user for the bank accounts for 7 Elite Construction and 7 Global Properties. The BMO Harris records indicate that he was the primary user of those accounts.

Proceeds Derived from Unlawful Activity

The money used to purchase the Mercedes Benz AMG S63 and the Octopus Car Wash both came from three bank accounts for Pinnacle at BMO Harris: acct. no. XXXXXX2919, acct. no. XXXXXX0290, and acct. no. XXXXXX2900.

On October 25, 2018, Debbie Long deposited the proceeds from twenty-five checks, \$318,310.41 in total, into XXXXXX2900 (\$100,310.41) and XXXXXX2919 (\$218,000.00). Six of the checks came from DHS in connection with Pinnacle's claims for reimbursement for personal care services.

Analyst Dieter's analysis of those six checks reveals that Pinnacle was paid, in part, in connection with all the fraudulent schemes mentioned above: billing for impossible or improbable hours, billing for services when no services were rendered, billing for services in excess of those that were rendered, billing while the member was in the hospital or incarcerated, and billing for misrepresentation of need.

The Flow of the Money Used to Purchase the Car and the Car Wash

After the money was paid to Pinnacle, Long and her husband moved it around in sixteen different financial transactions over the course of nine to eleven months before the car and car wash were purchased through a shell company.

January 23, 2020

To start, in three different transactions, Pinnacle transferred \$906,038.71 (from BMO Harris acct. no. XXXXXX2919), \$945,289.26 (from BMO Harris acct. no. XXXXXX0290), and \$150,000 (from BMO Harris acct. no. XXXXXX2900) to 7 Global

Properties (BMO Harris acct. no. XXXXXX9410). In total, Pinnacle transferred \$2,001,327.97 to 7 Global Properties.

February 11, 2020

7 Global Properties transferred \$2,000,000 from its checking account (BMO Harris acct. no. XXXXXX9410) to its savings account (BMO Harris acct. no. XXXXXX3828).

August 24, 2020

7 Global Properties (from BMO Harris acct. no. XXXXXX3828) transferred \$1,990,547.05 to a personal account for Debbie Long (BMO Harris acct. no. XXXXXX9688).

August 26, 2020

Long (from BMO Harris acct. no. XXXXXX9688) transferred \$1,900,000 to the Levi Day Memorial Trust (BMO Harris acct. no. XXXXXX9807). The time stamp on the deposit and withdrawal slips show that the transaction occurred at 16:01.

The full \$1,900,000 stayed put for six minutes. Then the Levi Day Memorial Trust (from BMO Harris acct. no. XXXXXX9807) transferred \$1,000,000 to 7 Global Properties (BMO Harris acct. no. XXXXXX9882) and \$500,000 to 7 Elite Construction (BMO Harris acct. no. XXXXXX9890). The first transfer was at 16:07 and the second was at 16:08.

Long (from BMO Harris acct. no. XXXXXX9688) also transferred \$24,000 to 7 Elite Construction (BMO Harris acct. no. XXXXXX9890). This took place at 16:09.

August 27, 2020

7 Global Properties transferred \$1,000,000 (from BMO Harris acct. no. XXXXXX9882) to Debbie Long (BMO Harris acct. no. XXXXXX9688) at 9:50.

7 Elite Construction transferred \$524,000 (i.e., the sum of the previous day's transfers into BMO Harris acct. no. XXXXXX9890) to Debbie Long (BMO Harris acct. no. XXXXXX9688) at 9:52.

The Levi Day Memorial Trust (from BMO Harris acct. no. XXXXXX9807) transferred \$400,000 (i.e., the remaining amount from the previous day's \$1,900,000 transfer from Debbie Long's account) back to Debbie Long (BMO Harris acct. no. XXXXXX9688). This happened at 9:53.

In other words, Debbie Long transferred a total of \$1,924,000 from her personal checking account (BMO Harris acct. no. XXXXXX9688) on August 26, 2020, to three separate shell companies, and got all the money back into the same personal checking account less than twenty-four hours later.

Nevertheless, the \$1,924,000 only stayed in Long's personal checking account for twelve minutes. Then Debbie Long (from BMO Harris acct. no. XXXXXX9688) transferred the full amount to her money market account (BMO Harris acct. no. XXXXXX9904) at 10:05.

August 31, 2020

Debbie Long (from BMO Harris acct. no. XXXXXX9904) transferred \$1,914,000 to the Levi Day Memorial Trust (BMO Harris acct. no. XXXXXX9807) at 10:21.

Levi Day Memorial Trust then (from BMO Harris acct. no. XXXXXX9807) transferred \$1,000,000 to 7 Global Properties (BMO Harris acct. no. XXXXXX9882) at 10:27.

October 16, 2020

7 Global Properties (from BMO Harris acct. no. XXXXXX9882) transferred \$100,000 to 7 Elite Construction (BMO Harris acct. no. XXXXXX9890).

So, from the \$1,000,000 transfer to 7 Global Properties on August 31, 2020, \$900,000 remained with 7 Global Properties and \$100,000 went to 7 Elite Construction.

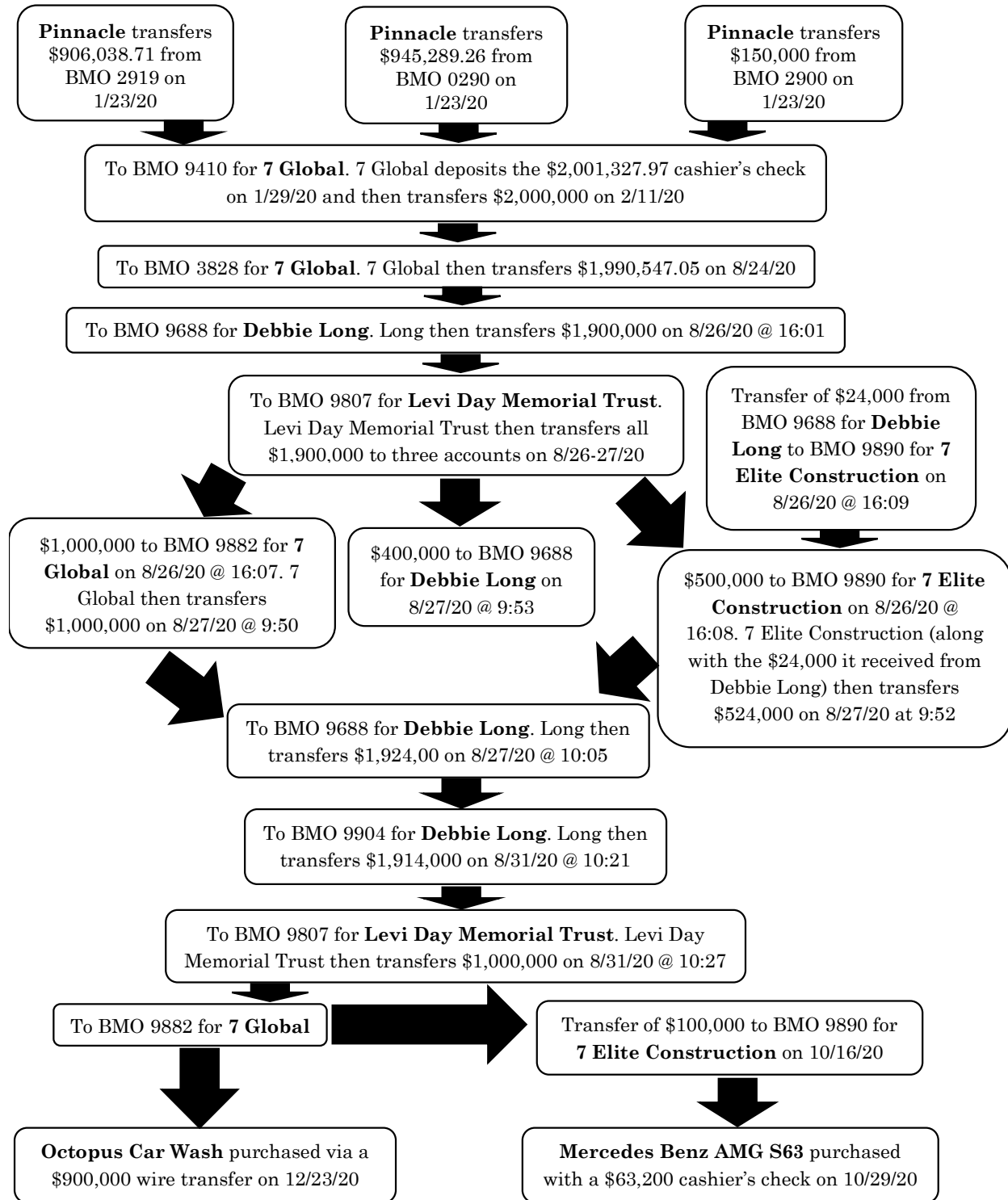
October 29, 2020

7 Elite Construction took out a cashier's check (from BMO Harris acct. no. XXXXXX9890) for \$63,200 to purchase a Mercedes Benz AMG S63.

December 23, 2020

7 Global Properties (from BMO Harris acct. no. XXXXXX9882) initiated a wire transfer of \$900,000 to purchase an Octopus Car Wash in Milwaukee.

Flow Chart of the Money Used to Purchase the Car and Car Wash



As to Count 1

Count 1 encompasses Debbie Long's scheme to defraud Wisconsin Medicaid on or between March 13, 2017, and August 12, 2022. As stated above, the investigation revealed that Long, through Pinnacle, was paid at least \$2,195,760.87 in fraudulent reimbursements.

Pursuant to Wis. Stat. § 971.36(3)(a), the State is alleging a continuing course of conduct.

As to Counts 2 & 3

Counts 2 and 3 concern Debbie Long's submission of a fraudulent PPP loan application to BMO Harris, which contained material misrepresentations about Pinnacle's workforce, Pinnacle's payroll expenses, and how the loan proceeds would be used.

Long used DocuSign to sign the fraudulent PPP loan application on or about May 5, 2020. The loan proceeds were deposited into a bank account for Pinnacle on or about May 8, 2020.

As to Count 4

Count 4 is about Debbie Long conducting a transaction to purchase Kitt's Custard, on or about August 28, 2020, using money that she knew was obtained by fraud against both PPP and Wisconsin Medicaid.

As to Count 5

Count 5 encompasses Debbie Long's participation in a scheme, as a party to a crime, on or between approximately January 23, 2020, and December 23, 2020, to

conduct a transaction that was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds, which were obtained through her scheme to defraud Wisconsin Medicaid.

Pursuant to Wis. Stat. § 943.895(2)(c), the State is alleging a continuing course of conduct, and the value of the total laundered proceeds exceeded \$100,000.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to me telephonically on May 5, 2026.

Electronically Signed By:

s/ Benjamin Christianson
Benjamin Christianson
Investigator
Wisconsin Department of Justice

Electronically Signed By:

s/ Timothy J. Filipa
TIMOTHY J. FILIPA
Assistant Attorney General
Medicaid Fraud Control & Elder Abuse Unit
Wisconsin Department of Justice
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