



Voyles was admitted to Emma's Place Assisted Living her care by Dr. Slomiany was discontinued.

- 6) On November 10, 2020, I interviewed the complainant Lisa Nice, the daughter of Wilma Voyles. Lisa was also the Power of Attorney for Wilma Voyles. I asked Lisa Nice if part of the in-house care services involved addressing the bed sore of her mother and she replied, "yes, yes and I told them up front you know I said, Mom, Mom has issues she's got a lot of medication. I told them everything about Mom and they said it was no big deal and Brad even at that point told me he had done an IV before for a patient, wasn't supposed to but he had done it." I asked Lisa if she was under the assumption at the time that Brad was a licensed Nurse and Jeanie was a licensed CNA and she replied "yes." I stated that Brad King and Jeanie King told her at the time that they were both licensed and Lisa replied "yes." I stated no doubt in your mind and she replied, "no doubt in my mind." I asked Lisa if it was her understanding that Brad was supposed to be changing her mother's bandages. Lisa replied, "ya, we thought that was part of the price we were paying was for this nurse to be there be next door."
- 7) Lisa stated that while her mother was in the hospital in July 2020, she called Brad King to determine if her mother could return to the facility and Brad told her that he could do an IV for his mother and he was OK with all of this. Lisa confirmed that this was in July 2020 and she was under the assumption that he was a licensed nurse.
- 8) Lisa stated after this incident involving her mother, she checked online in regarding the status of Brad's nursing license and Jeanie's CNA license. Lisa stated that she found that Brad's and Jeanie's licenses had expired. Lisa stated that she found out that their licenses had expired prior to admitting her mother at Emma's Place on March 16, 2020. Lisa stated that she didn't find that out until after her mother had left Emma's Place on July 22, 2020. I asked Lisa if she would have known that the King's license was expired would she have admitted her mother at Emma's Place and Lisa replied, "oh no, absolutely not." I stated but the King's conveyed to her when her mother was admitted on March 16, 2020 that they were both currently licensed as a nurse and CNA and Lisa replied "ya."
- 9) On December 2, 2020, I interviewed George Voyles the husband of Wilma Voyles. Mr. Voyles stated that he personally saw the Emma's Place Assisted Living ad in the newspaper. He stated that it was in the newspaper long before they ever thought about doing anything like this, taking her anywhere. He stated that the ad is still in the paper and is the same listing that it has always been. I asked Mr. Voyles if he recalled reading anything on Emma's Place advertisement that said that the facility was professionally licensed. Mr. Voyles stated "oh ya, ya they were licensed, ya. Licensed nurses." I asked Mr. Voyles that when he admitted his wife at Emma's Place was, he under the impression that Emma's Place was a professionally licensed Assisted Living. Mr. Voyles replied "oh, ya, ya. Brad, we met Brad too, that's Jeanie's husband and he was actually the nurse, the licensed nurse I don't know what you call them and Jeanie she was I don't know what her title. She wasn't a full-fledged-nurse, she was some kind of a nurse." I stated would that have been a CNA and he replied, "CNA, maybe." I said Certified Nursing Assistant and he replied, "there you go, ya, ya that sounds about right." I asked Mr. Voyles if Brad and Jeanie King told them, that they were a Nurse and CNA and he replied, "yes, yes, yes." I asked Mr. Voyles what kind of care he believed Brad King and Jeanie King were going to provide for his wife. He stated they were going to change the bandages on his wife, and they had been through all of that. He stated that he had told the Kings what they had been through and where they were going or had been taking her (Wound doctor). I asked Mr. Voyles when he admitted his wife at Emma's Place it was his understanding that Emma's Place was

professionally licensed, and that Brad King had stated that he was a licensed nurse and Jeanie was some kind of a nursing assistant and Mr. Voyles replied, "yes that's correct and it was in the paper that they were professionally licensed and the day that we admitted her Brad he was telling us all about it and what he was and what Jeanie was. So, I thought she was in good hands." I stated that was a selling point for you to admit your wife there is that correct and he replied, "oh yes, yes."

- 10) On December 15, 2020, I interviewed Joe Voyles the son of Wilma Voyles. Mr. Voyles stated that he spoke with both Brad and Jeanie King on the day that his mother was admitted into Emma's Place. Mr. Voyles stated that he was under the impression that Brad was a licensed nurse. He stated that Jeanie said that she was some kind of a medical aide or assistant also like a CNA. Mr. Voyles stated that after the meeting it was his impression that Brad King had a nursing license and Jeanie had some kind of medical assistant certification. Mr. Voyles stated that he really thought everything was on the up and up and that was his understanding of it they were licensed. Mr. Voyles stated that he heard Brad King say that he was going to change his mother's bandages and take care of her wound. I asked Mr. Voyles if he ever saw anyone changing his mother's bandages while she was at Emma's Place. He stated that he had helped change his mother's bandages at Emma's Place one time and he can remember looking at it. He stated that it was Brad King that was changing the bandage and who he helped.
- 11) On March 18, 2021, I interviewed RN Christopher Burnett. RN Burnett works for VNA Home Health and was providing wound care to Wilma Voyles at Emma's Place Assisted Living in 2020. I asked RN Burnett who else was caring for Ms. Voyles such as the Staff and Caregivers at Emma's Place when he wasn't there. I stated that I was referring to the care of Ms. Voyles' wound. I asked if the Staff/Caregivers were putting dressings on, medication, changing dressings when skilled nursing was not there and he replied, "when we're not there, yes, as needed." RN Burnett, stated, "but as far as I know when we go into a patient like this the Admission Nurse and subsequent nurses, we teach wound care to Caregivers or families or whoever may be providing wound care to that person and we rely on them to do that care when we are not there." I stated that you weren't going every day is that right and he replied, "correct, correct." I stated that no skilled nurse was there daily, and RN Burnett replied, "correct." RN Burnett was asked if he taught wound care to other staff or just Brad and Jeanie and he replied, "it was mostly just Brad and Jeanie." I stated to RN Burnett was it your assumption that the Caregivers whoever they may be there at Emma's Place were attending to the Midline Coccyx Wound of Ms. Voyles as far as changing a dressing if it needed to be dressed, applying the proper medication that goes in, packing it, gauze things to that effect. It was your assumption that was being done by them when a skilled nurse was not there and he replied, "correct."
- 12) On March 31, 2021, I interviewed CNA Emily Schocke a former employee at Emma's Place Assisted Living. I asked Ms. Schocke if Ms. Voyles' wound required a dressing and she replied, "yes." I asked Ms. Schocke who changed Ms. Voyles' dressings and she replied, "we did." I stated when you say we who is that and she replied, "CNA's. Caregivers. Brad showed us how to do all the dressings and then we did it." I asked Ms. Schocke if Brad and Jeanie changed the dressing on Wilma Voyles also and she replied, "yes, if it was their day to work, they would." I asked Ms. Schocke if she saw Brad and Jeanie changing Wilma's dressing and she replied, "initially they showed me how to do it and then we did it but, for the most part it was whoever was working that day did it." Ms. Schocke stated that she was also changing the dressing on the wound of another resident which was a male. She stated that the wound was on his tailbone.

- 13) On April 1, 2021, I interviewed CNA Diana Phillips a former employee at Emma's Place Assisted Living. She stated that the facility was a house, and the owners were Brad and Jeanie King. I asked Ms. Phillips if Brad was a nurse and she replied, "I guess." I asked Ms. Phillips if Brad told her, he was a nurse and she replied, "yes." I asked Ms. Phillips if Brad said he was an LPN or RN and she replied, "he said he was an LPN." I asked if Jeanie was a CNA and she replied, "yeah." I asked if she was currently licensed and she replied, "I don't know if she was currently licensed, but she did tell us she was a CNA and she worked there as a CNA before." I asked if Brad said that he was currently licensed as an LPN and she replied, "he never told us." I stated but they did tell you that they were an LPN and a CNA, and she replied, "yeah."
- 14) Ms. Phillips stated that she worked at Emma's Place Assisted Living in June and July 2020 and provided care for Wilma Voyles. I asked Ms. Phillips if Wilma Voyles had a wound on her body and she replied, "yes, she did have a wound on her bottom." She stated that when they got Wilma up in the morning there was a wound care process, and she would get another wound care process maybe before she went to bed. I stated when you say wound care process are you talking about changing the dressing, and she replied, "yeah, like having it being cleaned and stuff." Ms. Phillips stated that she followed directions on how to change Wilma's wound from written instructions on a paper left on Wilma's nightstand with Brad's signature. I stated he is telling you and giving directions on how to actually change the dressing and she replied, "yes." I stated and when I say change were you putting medication in there and gauze and she replied, "yes." I stated you were doing the same thing that the wound nurse was doing and she replied, "yes." I stated and that's putting new medication in and a gauze and the whole thing and she replied, "yeah." I stated not just the top part and she replied, "no, we had to clean it. We had to like clean, the inside of it. He taught us how to clean the inside with the long cue-tip sticks and everything." I stated who taught you that and she replied, "Brad King showed us how to do it so. Like if him and his wife didn't come over that day then I guess they wanted it to be done, I guess."
- 15) On April 14, 2021, I interviewed Courtney Hoke a former full-time employee at Emma's Place Assisted Living. She stated that when she worked at Emma's Place, she was not a CNA but was in nursing school studying to be a nurse. I asked Ms. Hoke if one of the residents at the facility was John Klein and she replied, "yes." She stated that he had a pressure wound and they changed it twice a day and then they would have a wound care nurse come in once a week or maybe twice a week. I asked Ms. Hoke when the home health person wasn't there to look after the wound who was looking after the wound and she replied, "the staff." I stated and that would be Brad, Jeanie and yourself and she replied, "uhm, uhm." I asked Ms. Hoke who instructed her that she had to change the dressings and bandages on John Klein and she replied, "Brad and Jeanie." I stated and they showed you how to change the bandages as well and she replied, "yes." I asked Ms. Hoke if she cared for a resident by the name of Wilma Voyles at Emma's Place and she replied, "yes." She indicated that Wilma Voyles also had a wound on her bottom. Ms. Hoke stated that she changed Ms. Voyles wound dressing also. I asked Ms. Hoke who told her to change Wilma's dressing and she replied, "Brad." I stated did Jeanie tell her to change the dressing too and she replied, "yeah, it was Brad and Jeanie." I stated did Brad demonstrate with Wilma on how to change the dressing and she replied, "yes and the nurses, and I would take notes from the nurse."
- 16) Ms. Hoke indicated that John Klein had a Foley catheter. She was asked who did the cath care and she replied, "we learned how to clean it. So, the same thing Brad showed us how to clean it, watched us clean it and they would have a nurse come in once or twice a week and change

it like put in a new catheter each time.” Ms. Hoke was asked to describe what kind of cath care she did, and she stated, “everyday, we would just wipe around his genital area so we would start by where the catheter was and just wipe around the tip of his privates and then go out each time. So, I think it was three (3) different times we would use a different cloth, like a different wipe and then we would take the catheter and go away from the body and do that three (3) times and flip the wipe for that each time. Your, not using the dirty part.” Ms. Hoke stated that the staff would empty the catheter in the morning, afternoon and evening if needed.

- 17) On April 28, 2021, I interviewed Rebekah Stonecipher. Ms. Stonecipher is a former full-time employee at Emma’s Place Assisted Living and related to Jeanie King. I asked Ms. Stoncipher if at any time Brad or Jeanie King showed her how to take care of the wound of John Klein and she replied, “they would if it got soiled, we would change the top like get the I think they call them 4 x 4’s we would take that off and replace it so the bacteria from the tape avoid not getting to the wound.” I asked if she took a long cue-tip with medication and swabbed the wound area the inside and around the edges before she put the bandages on and she replied, “yeah we would do that, yeah I remember that.”
- 18) On June 3, 2020, I interviewed Nurse Practitioner Kimberly Robertson. Ms. Robertson is a former employee at Advanced Care House Calls. Ms. Robertson was visiting Wilma Voyles and John Klein at Emma’s Place Assisted Living in the capacity of a Nurse Practitioner working for Advanced Care House calls. She stated that both Wilma Voyles and John Klein had pressure wounds on their backside. I asked Ms. Robertson when RN Chris Burnett was not there taking care of Wilma’s wound or the other nurses who would have been taking care of the wound and she replied, “should have been the facility staff whoever whether that be Brad, Jeanie or whomever to do the wound care.” I asked Ms. Robertson if any of the staff were nurses that she was aware of and she replied, “to my knowledge Brad was an LPN but I can’t I have no way to verify that.” I asked Ms. Robertson if Brad was a Certified LPN currently or he had been an LPN. Ms. Robertson stated, “I don’t know I was told he was an LPN, but I don’t.” I stated and what about Jeanie did she hold any type of certification CNA or Nurse and she replied, “she had said that she was a CNA but again I didn’t verify that by licensure.” Ms. Robertson stated that she was unaware that Emma’s Place Assisted Living was an un-licensed facility. I stated so you were told that Brad King was an LPN and she replied, “yes.” I stated and you assumed that he was a licensed LPN and she replied, “yes.”
- 19) An Indiana Professional License search indicated that Brad E. King was issued a Licensed Practical Nurse’s license on August 7, 2013 and it expired on October 31, 2016. The license number is 27070268A.
- 20) An Indiana Professional License search indicated that Jeanie M. King was not on file has having or have had a Professional license under the name Jeanie M. King. I searched under Jeanie King’s maiden name of Jeanie Mowery and found that she was issued a Certified Nurse’s Aide license on February 1, 2009 and it expired on February 1, 2015.
- 21) Following the receipt of the May 21, 2019 cease and desist letter from the Attorney General’s office, Brad and Jeanie King removed the information pertaining to skilled nursing on their web site <http://www.emmasplaceassistedliving.com> but continued advertising in the local newspaper that they were “Professionally Licensed.” The King’s and the facility held no current professional licenses
- 22) On October 23, 2020, I observed a news story on the internet concerning Emma’s Place Assisted Living. The story was written by Stephanie Taylor Ferriell who was the Print Editor of the Salem Leader. The article was published on September 26, 2018. The title of the article

is “Emma’s Place provided care in home-like setting.” The following are excerpts from the article:

- a. “Jeanie is a CNA with a background in the nursing home setting, which she said she didn’t like because of how rushed she felt with residents. She moved to assisted care and found her niche.”
  - b. “Brad became and LPN in 2013 and has worked in both hospitals and nursing home settings. He said he wanted to provide better care than what he’d witnessed “and what better way than to do it on your own.” “With both Brad and Jeanie being certified personnel, a nurse is on site day and night.”
  - c. On November 17, 2020, I sent a Subpoena Duces Tecum to Rhonda Smith who is the Manager of Leaders Publishing Company. Publishers of the Salem Leader, The Salem Democrat and Your AD-Vantage. The Subpoena requested Ad information on Emma’s Place Assisted living and copies of Ads.
- 23) On February 17, 2021, I received several e-mails with attachments of Ads of Emma’s Place Assisted Living from Manager Rhonda Smith dating from August 9, 2018 through December 27, 2018. All of the Ads contained the words “Professionally Licensed” in the Ad.
- 24) From August 9, 2018 through December 27, 2018 Emma’s Place Assisted Living placed 19 Ads with the words “Professionally Licensed” in the Ads. -Your-Ad-Vantage-5 Ads: The Salem Leader-9 Ads: The Salem Democrat-5 Ads: Total-19 Ads
- 25) On February 19, 2021, I received several e-mails with attachments of Ads of Emma’s Place Assisted Living from Manager Rhonda Smith dating from January 4, 2019 through February 11, 2021. All of the Ads contained the words “Professionally Licensed” in the Ad. -The Salem Leader-38 Ad, Your-Ad-Vantage-20 Ads, The Salem Democrat-20 Ads, Total-78 Ads
- 26) On February 12, 2021, Salem newspaper Manager Rhonda Smith told me that the King’s cancelled the Emma’s Place Ad that stated “Professionally Licensed” on February 11, 2021 which was one day after they were interviewed in this investigation.
- 27) On June 15, 2021, DAG Jordan Stover located Brad and Jeanie King’s web site that they had been requested to remove by the Indiana Attorney General and Indiana State Department of Health in 2019. The web site address was <http://www.emmasplaceassistedliving.com>. I received a copy of the web site Ad from DAG Stover on June 15, 2021 by e-mail. I viewed the Ad and under the **Our Services** section it stated the following:
- a. “We offer many services at Emma’s Place Senior Care assisted living home. If you have any questions about additional services, please don’t hesitate to contact us. **-24-hour/365 day attention w/ Skilled Nursing Services-**At Emma’s Place you are never left alone. Having someone there to assist with need requirements every day, all day brings a wonderful sense of relief and comfort to residents and their families. This care comes from highly educated and a well-trained, caretakers. **We take pride in having a licensed nurse on staff 24/7 as well as a certified nursing assistant.**”

I swear, under the penalty for perjury as specified by I.C. 35-44.1-2-1 that the foregoing is true to the best of my information and belief.

/s/ Jack Davis  
Affiant, Jack Davis  
Medicaid Fraud Control Unit  
Indiana Attorney General