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4 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**  
5 **FOR THE COUNTY OF BENTON**  
6

7 STATE OF OREGON  
8 Plaintiff,  
9 v.

**INFORMATION**

Court No. 26CR33199  
DOJ No. XMFBF0018-25

10 GATEWAY OF WILLAMETTE VALLEY,  
11 LLC  
12 Defendant,

**Co-Defendant: Linda Sue Thomas**

13 The Defendant, Gateway of Willamette Valley, LLC, and referred to as “Gateway” is accused by  
14 Ryan S. Joslin, District Attorney for the County of Benton, by this Information, of the crimes of:

15 **Count 1: MAKING FALSE CLAIM FOR HEALTH CARE PAYMENT**  
16 **(FSG=6; C Felony; ORS 165.692 / ORS 161.170 FPC #; committed as**  
17 **follows:**

18 The Defendant, on or between January 23, 2024 and April 19, 2024, in Benton  
19 County, Oregon, an agent of Gateway while acting within the scope of  
20 employment and on behalf of the corporation did unlawfully, knowingly, and with  
21 the intent to obtain a health care payment to which Defendant was not entitled,  
22 concealed from and failed to disclose to the Department of Human Services, a  
23 health care payor, the existence of information.

24 This count includes claims in Department of Human Services run numbers:

25 674602368, 674853320, 675652557, 683473411, 683732125, 686404934,  
26 693824052, 697272648, 698117139, and 699908364

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1 **Count 2: MAKING FALSE CLAIM FOR HEALTH CARE PAYMENT**  
2 **(FSG=6; C Felony; ORS 165.692 / ORS 161.170 FPC #; committed as**  
3 **follows:**

4 The Defendant, on or between May 1, 2024 and May 16, 2024, in Benton County,  
5 Oregon, an agent of Gateway while acting within the scope of employment and on  
6 behalf of the corporation did unlawfully, knowingly, and with the intent to obtain  
7 a health care payment to which Defendant was not entitled, concealed from and  
8 failed to disclose to the Department of Human Services, a health care payor, the  
9 existence of information.

10 This count includes claims in Department of Human Services run numbers:

11 707535330, 708028889, and 709504402

12 **Count 3: MAKING FALSE CLAIM FOR HEALTH CARE PAYMENT**  
13 **(FSG=6; C Felony; ORS 165.692 / ORS 161.170 FPC #; committed as**  
14 **follows:**

15 The Defendant, on or between May 17, 2024 and May 29, 2024, in Benton  
16 County, Oregon, an agent of Gateway while acting within the scope of  
17 employment and on behalf of the corporation did unlawfully, knowingly, and with  
18 the intent to obtain a health care payment to which Defendant was not entitled,  
19 concealed from and failed to disclose to the Department of Human Services, a  
20 health care payor, the existence of information.

21 This count includes claims in Department of Human Services run numbers:

22 702622440 and 706934127

23 **Count 4: MAKING FALSE CLAIM FOR HEALTH CARE PAYMENT**  
24 **(FSG=6; C Felony; ORS 165.692 / ORS 161.170 FPC #; committed as**  
25 **follows:**

26 The Defendant, on or between June 3, 2024 and June 21, 2024, in Benton County,  
Oregon, an agent of Gateway while acting within the scope of employment and on  
behalf of the corporation did unlawfully, knowingly, and with the intent to obtain  
a health care payment to which Defendant was not entitled, concealed from and  
failed to disclose to the Department of Human Services, a health care payor, the  
existence of information.

This count includes claims in Department of Human Services run numbers:

710683523 and 714738331

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1 **Count 5: MAKING FALSE CLAIM FOR HEALTH CARE PAYMENT**  
2 **(FSG=6; C Felony; ORS 165.692 / ORS 161.170 FPC #; committed as**  
3 **follows:**

4 The Defendant, on or about June 28, 2024, in Benton County, Oregon, an agent of  
5 Gateway while acting within the scope of employment and on behalf of the  
6 corporation did unlawfully, knowingly, and with the intent to obtain a health care  
7 payment to which Defendant was not entitled, concealed from and failed to  
8 disclose to the Department of Human Services, a health care payor, the existence  
9 of information.

10 This count includes claims in Department of Human Services run numbers:

11 715517068

12 **Count 6: MAKING FALSE CLAIM FOR HEALTH CARE PAYMENT**  
13 **(FSG=6; C Felony; ORS 165.692 / ORS 161.170 FPC #; committed as**  
14 **follows:**

15 The Defendant, on or between July 20, 2024 and December 24, 2024, in Benton  
16 County, Oregon, an agent of Gateway while acting within the scope of  
17 employment and on behalf of the corporation did unlawfully, knowingly, and with  
18 the intent to obtain a health care payment to which Defendant was not entitled,  
19 concealed from and failed to disclose to the Department of Human Services, a  
20 health care payor, the existence of information.

21 This count includes claims in Department of Human Services run numbers:

22 719346456, 721481551, 722779736, 723745929, 724227152, 726193610,  
23 727321039, 729470915, 729838586, 733662964, 733906848, 735652655,  
24 736537124, 739924842, 738132636, 741031007, 741199022, and 743693949

25 **Count 7: MAKING FALSE CLAIM FOR HEALTH CARE PAYMENT**  
26 **(FSG=6; C Felony; ORS 165.692 / ORS 161.170 FPC #; committed as**  
27 **follows:**

28 The Defendant, on or between December 26, 2024 to March 28, 2025, in Benton  
29 County, Oregon, an agent of Gateway while acting within the scope of  
30 employment and on behalf of the corporation did unlawfully, knowingly, and with  
31 the intent to obtain a health care payment to which Defendant was not entitled,  
32 concealed from and failed to disclose to the Department of Human Services, a  
33 health care payor, the existence of information.

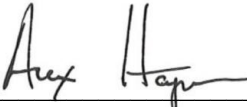
34 This count includes claims in Department of Human Services run numbers:

35 743903736, 746063032, 747906152, 747632382, 747906152, 750934647,  
36 751174522, 753224247, and 758628274

1 The State further alleges the conduct alleged in all the above counts is of same or similar  
2 character, or is based on the same act or transaction, or is based on two or more acts or  
3 transactions connected together or constituting parts of a common scheme or plan.

4 All of the above-described conduct being contrary to statute and against the peace and dignity of  
5 the State of Oregon.

6 DATED: 17 June 2026  
7 RYAN S. JOSLIN  
8 DISTRICT ATTORNEY FOR BENTON COUNTY, OREGON

9 By:   
10 Alex Hargrove, OSB #196380  
11 Special Deputy District Attorney

12 IDENTIFIERS: N/A  
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