

THE CLOCK IS ALREADY RUNNING

The 60-day clock is *already* running.

The CMS 60-Day Rule (42 USC 1320a-7k(d)) applies to your MCO. The Supreme Court has ruled that “*knowingly*” includes deliberate ignorance. The defense of “*we did not look*” no longer exists.

1,297

Qui tam filings, FY 2025

60d

From identifiable to liable

\$28,619

Max FCA penalty per claim

THE MATH, CONSERVATIVELY STATED

1,000 undetected fraudulent settlements	\$5K each	\$5M
Trebled under 31 USC 3729(a)(1)(G)	× 3	\$15M
Per-claim FCA penalties	\$14,308 – \$28,619	\$14.3M – \$28.6M
<i>Total FCA exposure</i>		\$29.3 – \$43.6M

Source – DOJ Civil Division, FY 2025 enforcement summary, Jan 2026

WHAT JIL DOES, IN ONE TIMELINE

From identification to safe harbor in *180 days*.

DAY 0

Tier 1 scan

Four years of settlement data scanned. Fraudulent settlements surfaced, grouped by operator. The overpayment is identified — the 60-day clock runs on your terms.

AGENT LAYER

AVA decides

The **Adaptive Validation Agent** reviews each flagged case and chooses the next action — skipping checks that won't change the outcome. Less spend for you, faster signal, no waste.

DAY 0 - 180

Tier 2 investigation

AVA-directed: UBO resolution, bank fingerprinting, premise classification, network detection. Output: CREB, anchored under FRE 902(14).

DAY 180

Safe harbor

You sit inside the investigation safe harbor with documented evidence. Self-disclosure is defensible. Cooperation credit is on the table.

CONTINUOUS · OPTIONAL Pre-settlement attestation

Tier 1 detection on incoming settlements *before* payment leaves treasury. Flagged settlements never settle. The exposure does not arise.

What we are. *A detection and proof company — we identify fraud, prove it with court-admissible evidence, and package it for your team or counsel.*

What we are not. *We do not pursue recovery. We do not take contingency. The suits and settlements stay with you.*

EVIDENCE THAT HOLDS IN COURT

148 attestation checks. Three signals that catch deliberate concealment.

AVA — 8 VALIDATION CATEGORIES

01 **Claims-data anomalies**

Upcoded codes, duplicate billing, deceased beneficiaries

02 **Corporate identity**

FinCEN BOI, SOS filings, OpenCorporates

03 **Financial infrastructure**

Shared bank accounts, signatory overlap

04 **Address co-location**

Hospice in a strip mall, DME at a UPS Store

05 **Premise classification**

Building type vs. claimed business operation

06 **Throughput plausibility**

Can the premise physically support the volume

07 **Exclusion screening**

LEIE, SAM, OFAC, state Medicaid exclusions

08 **Network detection**

Corporate, financial, address, premise graphs

i. **Premise classification**

The building cannot lie.

A 200-bed hospice billing from a 1,400 sqft mixed-use unit. A DME supplier registered at a UPS Store. AVA classifies the premise from public Street View and property records — defensible without expert testimony.

ii. **UBO resolution**

Find the human behind the shells.

14 LLCs through a Cayman holding through a Delaware parent through a nominee agent. AVA walks the chain — FinCEN BOI, CTA, state SOS, OpenCorporates — and outputs the human's name, every entity they control, with source citations.

iii. **Bank-account fingerprinting**

Where paper lies, money tells the truth.

14 entities with totally different paper ownership all deposit into 3 shared bank accounts with one common signatory. Account numbers hashed at ingest, never persisted. GLBA-compliant by design.

CREB™ THE OUTPUT

FRE 902(14)

Court Ready Evidence Model. Per-claim, per-entity, or per-network admissible package — anchored on CourtChain. UBO chain resolved, bank fingerprints hashed, premise verified, Street View attached, citations indexed, investigator approval locked. *Ready before counsel reads it.*

THE ECONOMICS

Three tiers. *You always see cost before work runs.*

<p>TIER 1</p> <p>Retroactive Detection</p> <p>\$150K – \$750K</p> <p><i>Annual flat fee, scaled by MCO size</i></p> <hr/> <p>Four-year retroactive scan. Fraudulent-settlement report. Bad Actor candidate list. Safe-harbor anchor evidence.</p>	<p>TIER 2</p> <p>Per-Case Investigation</p> <p>À la carte</p> <p><i>Customer authorizes per case</i></p> <hr/> <p>AVA-directed: UBO resolution, bank fingerprinting, premise classification, network detection, per-case CREB. You only authorize cases you choose to escalate. Sealed Escrow caps each engagement at the protocol level.</p>	<p>OPTIONAL</p> <p>Pre-Settlement Attestation</p> <p>up to \$5M</p> <p><i>Optional follow-on, annual flat</i></p> <hr/> <p>Pre-settlement detection on incoming settlements. Attestation gates before payment. Bad-actor block at the source. Flagged settlements never clear.</p>
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THE RATIO THAT MATTERS

98.4% *of the exposure stays in your pocket.*

1,000 undetected settlements × \$5K = \$29.3M – \$43.6M FCA exposure
Tier 1 + Tier 2 at MCO scale ≈ 1.6% of avoided exposure

THE COMPOUNDING ASSET

The JIL Bad Actor Registry deepens with every engagement.

Every confirmed-fraudulent UBO, bank account, premise, and entity flows in. Bad actors who tried your network last year cannot enter again — and those who tried your peer's are flagged before they reach yours.

THE NEXT 30 DAYS

Defined scope. Sized to your MCO. *Zero downside.*

HOW RISK CHANGES ONCE JIL IS ENGAGED

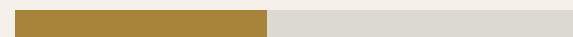
Today
RISK MAXIMUM

The 60-day clock runs from the day fraud is identifiable, whether you look or not. 1,297 qui tam filings a year. The next one could be yours.



Day 0 with JIL
RISK CONTAINED

The safe harbor is yours. Cooperation credit is on the table. Documented good-faith investigation lives in your file.



With Pre-Settlement
RISK STRUCTURALLY PRECLUDED

Flagged settlements never clear. Bad actors blocked at the source. The exposure does not arise.



TO START A DISCOVERY CALL, SHARE FIVE THINGS

- 01 Annual claims paid — and total dollar settled
- 02 Scope — full book, single line of business, or single state
- 03 Internal stakeholders — SIU, payment integrity, outside counsel
- 04 Access — settlement-ledger access, BAA scope, FinCEN BOI authorization
- 05 Executive sponsor — the person who owns recovery and compliance P&L

[Schedule a Discovery Call →](#)

[Read the AVA Design →](#)

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Compliance hubs — Switzerland • UAE • Singapore