

Approved: Rebecca Ricigliano 13 MAG 27 11
 REBECCA RICIGLIANO
 SHANE STANSBURY
 P. IAN MCGINLEY
 Assistant U.S. Attorneys

Before: HONORABLE KEVIN NATHANIEL FOX
 United States Magistrate Judge
 Southern District of New York

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UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
- v. -	:	Violations of
	:	18 U.S.C. §§ 1349, 371,
MIKHAIL KULESHOV,	:	641, 1347, 1035
ANNA KULESHOVA,	:	
ANDREY ARTASOV,	:	COUNTY OF OFFENSE:
NATALIYA ARTASOVA,	:	NEW YORK, BRONX
SERGEY OGURTSOV,	:	
TATIANA OGURTSOVA,	:	
OLGA KOKHANOVA,	:	
ALEXEY KOKHANOV,	:	
VYACHESLAV SERGEEV,	:	
OLGA TRUBNIKOVA,	:	
ANDREY DEMIN,	:	
ALLA DEMINA,	:	
ANDREY SAVUSHKIN,	:	
EKATERINA SAVUSHKINA,	:	
TIMUR SALOMATIN,	:	
NAILYA BABAIEVA,	:	
MIKHAIL KORNEEV,	:	
NATALIYA KORNEEVA,	:	
ANDREY BOBYLEV,	:	
EKATERINA BOBYLEVA,	:	
VITALY SAGURA,	:	
YAROSLAVA LAZAREVA,	:	
ROMAN LYUBUSHKIN,	:	
ELENA LYUBUSHKINA,	:	
ANDREY SOKOLOV,	:	
MARINA BARYSHNIKOVA,	:	
KONSTANTIN BELYAEV,	:	
DARIA BELYAEVA,	:	
YURIY SPIRIN,	:	
ANNA SPIRINA,	:	
VICTOR VINOGRADOV,	:	

ALEXANDRA VINOGRADOVA,
DANIIL MOKIN, :
ANNA MOKINA,
ALEXANDER BEYKUN, :
ELENA BEYKUN,
SERGEY SHCHERBAKOV, :
OLESYA NOVIKOVA,
DENIS ARINUSHKIN, :
EVGENIA ARINUSHKINA,
ANDREY SHAMIN, :
EKATERINA SHAMINA,
ANDREY KALININ, :
IRINA SHIRSHOVA,
OLEG KRAVCHENKO, :
OLESYA KRAVCHENKO,
VITALY KONDRATENKO, :
NATALIYA KONDRATENKO, and
ALEXEY SKORODUMOV, :

Defendants. :

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SOUTHERN DISTRICT OF NEW YORK, ss.:

JEREMY ROBERTSON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation, and charges as follows:

COUNT ONE

(Conspiracy to Commit Health Care Fraud)

1. From at least in or about 2004, up to and including in or about August 2013, in the Southern District of New York and elsewhere, MIKHAIL KULESHOV, ANNA KULESHOVA, ANDREY ARTASOV, NATALIYA ARTASOVA, SERGEY OGURTSOV, TATIANA OGURTSOVA, ALEXEY KOKHANOV, OLGA KOKHANOVA, VYACHESLAV SERGEEV, OLGA TRUBNIKOVA, ANDREY DEMIN, ALLA DEMINA, ANDREY SAVUSHKIN, EKATERINA SAVUSHKINA, TIMUR SALOMATIN, NAILYA BABAEVA, MIKHAIL KORNEEV, NATALIYA KORNEEVA, ANDREY BOBYLEV, EKATERINA BOBYLEVA, VITALY SAGURA, YAROSLAVA LAZAREVA, ROMAN LYUBUSHKIN, ELENA LYUBUSHKINA, ANDREY SOKOLOV, MARINA BARYSHNIKOVA, KONSTANTIN BELYAEV, DARIA BELYAEVA, YURIY SPIRIN, ANNA SPIRINA, VICTOR VINOGRADOV, ALEXANDRA VINOGRADOVA, DANIIL MOKIN, ANNA MOKINA, ALEXANDER BEYKUN, ELENA BEYKUN, SERGEY SHCHERBAKOV, OLESYA NOVIKOVA, DENIS ARINUSHKIN, EVGENIA ARINUSHKINA, ANDREY SHAMIN, EKATERINA SHAMINA, ANDREY KALININ, IRINA SHIRSHOVA, OLEG KRAVCHENKO,

OLESYA KRAVCHENKO, VITALY KONDRATENKO, NATALIYA KONDRATENKO, and ALEXEY SKORODUMOV, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to commit health care fraud in violation of Title 18, United States Code, Section 1347.

2. It was a part and an object of the conspiracy that MIKHAIL KULESHOV, ANNA KULESHOVA, ANDREY ARTASOV, NATALIYA ARTASOVA, SERGEY OGURTSOV, TATIANA OGURTSOVA, ALEXEY KOKHANOV, OLGA KOKHANOVA, VYACHESLAV SERGEEV, OLGA TRUBNIKOVA, ANDREY DEMIN, ALLA DEMINA, ANDREY SAVUSHKIN, EKATERINA SAVUSHKINA, TIMUR SALOMATIN, NAILYA BABAEVA, MIKHAIL KORNEEV, NATALIYA KORNEEVA, ANDREY BOBYLEV, EKATERINA BOBYLEVA, VITALY SAGURA, YAROSLAVA LAZAREVA, ROMAN LYUBUSHKIN, ELENA LYUBUSHKINA, ANDREY SOKOLOV, MARINA BARYSHNIKOVA, KONSTANTIN BELYAEV, DARIA BELYAEVA, YURIY SPIRIN, ANNA SPIRINA, VICTOR VINOGRADOV, ALEXANDRA VINOGRADOVA, DANIIL MOKIN, ANNA MOKINA, ALEXANDER BEYKUN, ELENA BEYKUN, SERGEY SHCHERBAKOV, OLESYA NOVIKOVA, DENIS ARINUSHKIN, EVGENIA ARINUSHKINA, ANDREY SHAMIN, EKATERINA SHAMINA, ANDREY KALININ, IRINA SHIRSHOVA, OLEG KRAVCHENKO, OLESYA KRAVCHENKO, VITALY KONDRATENKO, NATALIYA KONDRATENKO, and ALEXEY SKORODUMOV, the defendants, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud a health care benefit program, and to obtain, by means of false and fraudulent pretenses, representations, and promises, money owed by and under the custody and control of a health care benefit program in connection with the delivery of payment and for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about May 22, 2012, in the Southern District of New York, ANNA KULESHOVA and MIKHAIL KULESHOV, the defendants, submitted a Medicaid application that: (i) contained a false household size number, (ii) failed to report the income of KULESHOV, and (iii) falsely stated that KULESHOV was KULESHOVA's brother.

b. On or about November 19, 2008, in the Southern District of New York, ANDREY ARTASOV and NATALIYA ARTASOVA, the defendants, submitted: (i) a Medicaid application that falsely underreported ARTASOV's income, and (ii) a letter signed by a co-conspirator not named as a defendant herein ("CC-1") falsely underreporting ARTASOV's income.

c. In or about January 2011, in the Southern District of New York, SERGEY OGURTSOV and TATIANA OGURTSOVA, the defendants, submitted: (i) a Medicaid application that falsely underreported OGURTSOV's income, and (ii) a letter signed by MIKHAIL KORNEEV, the defendant, falsely underreporting OGURTSOV's income.

d. In or about February 2007, in the Southern District of New York, ALEXEY KOKHANOV and OLGA KOKHANOVA, the defendants, submitted: (i) a Medicaid application that falsely underreported KOKHANOV's income, and (ii) a letter signed by a co-conspirator not named as a defendant herein ("CC-2") falsely underreporting KOKHANOV's income.

e. In or about September 2010, in the Southern District of New York, VYACHESLAV SERGEEV and OLGA TRUBNIKOVA, the defendants, submitted: (i) a Medicaid application that falsely underreported SERGEEV's income, and (ii) a letter signed by KORNEEV falsely underreporting SERGEEV's income.

f. In or about June 2007, in the Southern District of New York, ALLA DEMINA and ANDREY DEMIN, the defendants, submitted: (i) a Medicaid renewal application that falsely underreported DEMIN's income, and (ii) a letter signed by CC-1 falsely underreporting DEMIN's income.

g. In or about July 2007, in the Southern District of New York, ANDREY SAVUSHKIN and EKATERINA SAVUSHKINA, submitted: (i) a Medicaid application that falsely underreported SAVUSHKIN's income, and (ii) a letter signed by a co-conspirator not named as a defendant herein ("CC-3") falsely underreporting SAVUSHKIN's income.

h. On or about November 5, 2010, in the Southern District of New York, NAILYA BABAEVA and TIMUR SALOMATIN, the defendants, submitted: (i) a Medicaid application that falsely underreported SALOMATIN's income, and (ii) a letter signed by KORNEEV falsely underreporting SALOMATIN's income.

i. On or about July 18, 2011, in the Southern District of New York, MIKHAIL KORNEEV and NATALIYA KORNEEVA, the defendants, submitted: (i) a Medicaid application that falsely underreported KORNEEV's income, and (ii) a letter signed by a co-conspirator not named as a defendant herein ("CC-4") falsely underreporting KORNEEV's income.

j. In or about 2009, in the Southern District of New York, ANDREY BOBYLEV and EKATERINA BOBYLEVA, the defendants, submitted: (i) a Medicaid renewal application that falsely underreported BOBYLEV's income, and (ii) a letter signed by KORNEEV falsely underreporting BOBYLEV's income.

k. On or about August 13, 2007, in the Southern District of New York, VITALY SAGURA and YAROSLAVA LAZAREVA, the defendants, submitted: (i) a Medicaid application that falsely underreported SAGURA's income, and (ii) a letter signed by CC-2 falsely underreporting SAGURA's income.

l. On or about January 25, 2011, in the Southern District of New York, ROMAN LYUBUSHKIN and ELENA LYUBUSHKINA, the defendants, submitted: (i) a Medicaid application that falsely reported LYUBUSHKIN's income, and (ii) a letter signed by a co-conspirator not named as a defendant herein ("CC-5") falsely underreporting LYUBUSHKIN's income.

m. On or about November 23, 2011, in the Southern District of New York, ANDREY SOKOLOV and MARINA BARYSHNIKOVA, the defendants, submitted: (i) a Medicaid application that falsely underreported SOKOLOV's income, and (ii) a letter signed by KONSTANTIN BELYAEV, the defendant, falsely underreporting SOKOLOV's income.

n. In or about December 2009, in the Southern District of New York, KONSTANTIN BELYAEV and DARIA BELYAEVA, the defendants, submitted: (i) a Medicaid application that falsely underreported BELYAEV's income, and (ii) a letter signed by KORNEEV falsely underreporting BELYAEV's income.

o. In or about January 2011, in the Southern District of New York, YURIY SPIRIN and ANNA SPIRINA, the defendants, submitted: (i) a Medicaid application that falsely underreported SPIRIN's income, and (ii) a letter signed by KORNEEV falsely underreporting SPIRIN's income.

p. In or about March 2010, in the Southern District of New York, VICTOR VINOGRADOV and ALEXANDRA VINOGRADOVA, the

defendants, submitted: (i) a Medicaid application that falsely underreported VINOGRADOV's income, and (ii) a letter signed by KORNEEV falsely underreporting VINOGRADOV's income.

q. In or about March 2011, in the Southern District of New York, DANIIL MOKIN and ANNA MOKINA, the defendants, submitted: (i) a Medicaid application that falsely underreported MOKIN's income, and (ii) a letter signed by KORNEEV falsely underreporting MOKIN's income.

r. In or about August 2010, in the Southern District of New York, ALEXANDER BEYKUN and ELENA BEYKUN, the defendants, submitted: (i) a Medicaid application that falsely underreported BEYKUN's income, and (ii) a letter signed by KORNEEV falsely underreporting BEYKUN's income.

s. In or about October 2007, in the Southern District of New York, OLESYA NOVIKOVA and SERGEY SHCHERBAKOV, the defendants, submitted: (i) a Medicaid application that falsely underreported SHCHERBAKOV's income, and (ii) a letter signed by CC-1 falsely underreporting SHCHERBAKOV's income.

t. In or about May 2008, in the Southern District of New York, DENIS ARINUSHKIN and EVGENIA ARINUSHKINA, the defendants, submitted: (i) a Medicaid application that falsely underreported ARINUSHKIN's income, and (ii) a letter signed by CC-1 falsely underreporting ARINUSHKIN's income.

u. In or about November 2010, in the Southern District of New York, ANDREY SHAMIN and EKATERINA SHAMINA, the defendants, submitted: (i) a Medicaid application that falsely underreported SHAMIN's income, and (ii) a letter signed by KORNEEV falsely underreporting SHAMIN's income.

v. In or about March 2009, in the Southern District of New York, ANDREY KALININ and IRINA SHIRSHOVA, the defendants, submitted: (i) a Medicaid application that falsely underreported KALININ's income, and (ii) a letter signed by KORNEEV falsely underreporting KALININ's income.

w. In or about April 2008, in the Southern District of New York, OLEG KRAVCHENKO and OLESYA KRAVCHENKO, the defendants, submitted: (i) a Medicaid application that falsely underreported OLEG KRAVCHENKO's income, and (ii) a letter signed by CC-1 falsely underreporting OLEG KRAVCHENKO's income.

x. In or about May 2007, in the Southern District of New York, VITALIY KONDRATENKO and NATALIYA KONDRATENKO, the defendants, submitted a Medicaid application that falsely represented that their child was a United States citizen.

y. In or about February 2005, in the Southern District of New York, ALEXEY SKORODUMOV, the defendant, submitted a Medicaid application that falsely represented that his child was a United States citizen.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Conspiracy to Steal Government Funds and Make False Statements Relating to Health Care Matters)

4. From at least in or about 2004 up to and including in or about August 2013, in the Southern District of New York and elsewhere, MIKHAIL KULESHOV, ANNA KULESHOVA, ANDREY ARTASOV, NATALIYA ARTASOVA, SERGEY OGURTSOV, TATIANA OGURTSOVA, ALEXEY KOKHANOV, OLGA KOKHANOVA, VYACHESLAV SERGEEV, OLGA TRUBNIKOVA, ANDREY DEMIN, ALLA DEMINA, ANDREY SAVUSHKIN, EKATERINA SAVUSHKINA, TIMUR SALOMATIN, NAILYA BABAEVA, MIKHAIL KORNEEV, NATALIYA KORNEEVA, ANDREY BOBYLEV, EKATERINA BOBYLEVA, VITALY SAGURA, YAROSLAVA LAZAREVA, ROMAN LYUBUSHKIN, ELENA LYUBUSHKINA, ANDREY SOKOLOV, MARINA BARYSHNIKOVA, KONSTANTIN BELYAEV, DARIA BELYAEVA, YURIY SPIRIN, ANNA SPIRINA, VICTOR VINOGRADOV, ALEXANDRA VINOGRADOVA, DANIIL MOKIN, ANNA MOKINA, ALEXANDER BEYKUN, ELENA BEYKUN, SERGEY SHCHERBAKOV, OLESYA NOVIKOVA, DENIS ARINUSHKIN, EVGENIA ARINUSHKINA, ANDREY SHAMIN, EKATERINA SHAMINA, ANDREY KALININ, IRINA SHIRSHOVA, OLEG KRAVCHENKO, OLESYA KRAVCHENKO, VITALY KONDRATENKO, NATALIYA KONDRATENKO, and ALEXEY SKORODUMOV, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, theft of government funds, in violation of Title 18, United States Code, Section 641, and false statements relating to health care matters, in violation of Title 18, United States Code, Section 1035.

5. It was a part and an object of the conspiracy that MIKHAIL KULESHOV, ANNA KULESHOVA, ANDREY ARTASOV, NATALIYA ARTASOVA, SERGEY OGURTSOV, TATIANA OGURTSOVA, ALEXEY KOKHANOV, OLGA KOKHANOVA, VYACHESLAV SERGEEV, OLGA TRUBNIKOVA, ANDREY DEMIN, ALLA DEMINA, ANDREY SAVUSHKIN, EKATERINA SAVUSHKINA, TIMUR SALOMATIN, NAILYA BABAEVA, MIKHAIL KORNEEV, NATALIYA

KORNEEVA, ANDREY BOBYLEV, EKATERINA BOBYLEVA, VITALY SAGURA, YAROSLAVA LAZAREVA, ROMAN LYUBUSHKIN, ELENA LYUBUSHKINA, ANDREY SOKOLOV, MARINA BARYSHNIKOVA, KONSTANTIN BELYAEV, DARIA BELYAEVA, YURIY SPIRIN, ANNA SPIRINA, VICTOR VINOGRADOV, ALEXANDRA VINOGRADOVA, DANIIL MOKIN, ANNA MOKINA, ALEXANDER BEYKUN, ELENA BEYKUN, SERGEY SHCHERBAKOV, OLESYA NOVIKOVA, DENIS ARINUSHKIN, EVGENIA ARINUSHKINA, ANDREY SHAMIN, EKATERINA SHAMINA, ANDREY KALININ, IRINA SHIRSHOVA, OLEG KRAVCHENKO, OLESYA KRAVCHENKO, VITALY KONDRATENKO, NATALIYA KONDRATENKO, and ALEXEY SKORODUMOV, the defendants, and others known and unknown, willfully and knowingly would and did embezzle, steal, purloin, and convert to their use and the use of another, vouchers, money and things of value of the United States and a department and an agency thereof, to wit, the United States Department of Health and Human Services, which exceeded the sum of \$1,000, and did receive, conceal, and retain the same with intent to convert it to their use and gain, knowing it to have been embezzled, stolen, purloined and converted, in violation of Title 18, United States Code, Section 641.

6. It was a further part and an object of the conspiracy that MIKHAIL KULESHOV, ANNA KULESHOVA, ANDREY ARTASOV, NATALIYA ARTASOVA, SERGEY OGURTSOV, TATIANA OGURTSOVA, ALEXEY KOKHANOV, OLGA KOKHANOVA, VYACHESLAV SERGEEV, OLGA TRUBNIKOVA, ANDREY DEMIN, ALLA DEMINA, ANDREY SAVUSHKIN, EKATERINA SAVUSHKINA, TIMUR SALOMATIN, NAILYA BABAEVA, MIKHAIL KORNEEV, NATALIYA KORNEEVA, ANDREY BOBYLEV, EKATERINA BOBYLEVA, VITALY SAGURA, YAROSLAVA LAZAREVA, ROMAN LYUBUSHKIN, ELENA LYUBUSHKINA, ANDREY SOKOLOV, MARINA BARYSHNIKOVA, KONSTANTIN BELYAEV, DARIA BELYAEVA, YURIY SPIRIN, ANNA SPIRINA, VICTOR VINOGRADOV, ALEXANDRA VINOGRADOVA, DANIIL MOKIN, ANNA MOKINA, ALEXANDER BEYKUN, ELENA BEYKUN, SERGEY SHCHERBAKOV, OLESYA NOVIKOVA, DENIS ARINUSHKIN, EVGENIA ARINUSHKINA, ANDREY SHAMIN, EKATERINA SHAMINA, ANDREY KALININ, IRINA SHIRSHOVA, OLEG KRAVCHENKO, OLESYA KRAVCHENKO, VITALY KONDRATENKO, NATALIYA KONDRATENKO, and ALEXEY SKORODUMOV, the defendants, and others known and unknown, willfully and knowingly would and did, in a matter involving a health care program, falsify, conceal, and cover up by trick, scheme, and device, a material fact and made materially false, fictitious, and fraudulent statements and representations, and made and used a materially false writings or documents knowing the same to contain a materially false, fictitious, and fraudulent statements and entries in connection with the delivery and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1035.

OVERT ACTS

7. The overt acts set forth in paragraph 3(a)-(y) are repeated and realleged as if set forth fully herein.

(Title 18, United States Code, Section 371.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

8. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have personally participated in the investigation of this matter. This affidavit is based upon my personal knowledge, my review of documents, involvement in an undercover operation during the course of this investigation, and my conversations with law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Indeed, I have omitted some of the facts that I know about the defendants and their co-conspirators in order to protect various sources of information. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise expressly indicated. For purposes of this Complaint, the term "diplomat" refers to persons representing the government or accredited affiliate of a foreign nation in the United States. A spouse and/or children of a diplomat, as dependents of the diplomats, are present in the United States on diplomatic visas and enjoy all of the privileges and immunities of the diplomat.

OVERVIEW OF THE INVESTIGATION

9. For over the past year and half, the FBI has investigated a Medicaid fraud scheme perpetrated by Russian diplomats and spouses of the diplomats living and working in New York City. The investigation has revealed the systematic, fraudulent submission of falsified applications for Medicaid benefits associated with medical costs for pregnancy, birth, and young children by Russian diplomats and the spouses of the diplomats. As a result of the falsified applications, the defendants named herein obtained Medicaid benefits that they were not otherwise entitled to because of the defendants' fraud. Medicaid, a program largely federally funded by the United States taxpayers, ultimately covered the costs associated with the pregnancies, births, and first-year-of-life medical needs of

the large number of Russian diplomats, the spouses of the diplomats, and their children. In total, the investigation uncovered approximately \$1,500,000 in fraudulently received Medicaid benefits, including the amount of benefits awarded to the defendants and dozens of other co-conspirators not named as defendants herein.

10. The fraudulent use of Medicaid benefits to cover the costs of pregnancy and child birth is widespread among the Russian diplomats and the spouses of the diplomats. Based on my review of State Department records and my discussions with an FBI agent who analyzed those records, I know that of the 63 births to Russian diplomats and their spouses in New York City between the years 2004 and 2013, 58 of those families, or 92%, were paid for by Medicaid benefits. In contrast, and based on my discussion with an employee from the NYDOH, I know that in New York County, where almost all of the spouses of the Russian diplomats have given birth, only approximately 37% of births in 2011 were paid for by Medicaid or other New York State benefit programs.

11. A review of the Russian diplomats' and their spouses' falsified Medicaid applications revealed general patterns of misrepresentations, which allowed them to qualify for Medicaid. The pattern generally included the following:

(i) The diplomats and their spouses generally fraudulently underreported their household income to an amount below the applicable Medicaid eligibility level in order to qualify for Medicaid benefits. If the Russian diplomats and/or their spouses correctly reported their income, they would not qualify for Medicaid benefits relating to pregnancy. For example, as set forth in detail below, TIMUR SALOMATIN, the defendant, formerly an accredited Russian diplomat at the Russian Mission to the United Nations (the "Mission"), reported his income to be \$3,000 a month on the Medicaid application of his wife, NAILYA BABAEVA, the defendant. This is just below the applicable eligibility threshold of \$3,052. In fact, SALOMATIN was being paid approximately \$5,160 a month by the Mission around the time he and BABAEVA applied for Medicaid - thousands of dollars above the eligibility threshold and approximately 172% more in salary than he was claiming to receive.

(ii) In support of the fraudulently underreported income levels, the Russian diplomats and their spouses also generally submitted letters purporting to certify the false, underreported income amount as a true income. The letters were

signed by MIKHAIL KORNEEV and KONSTANTIN BELYAEV, the defendants, and CC-1, CC-2, CC-3, CC-4, and CC-5. KORNEEV formerly served as a Counselor and BELYAEV formerly served as a Second Secretary, both at the Mission. CC-1 formerly served as a Counselor at the Mission. CC-2 is a Consul at the Consulate General of the Russian Federation in New York (the "Consulate"). CC-3 was formerly a Consul at the Consulate. CC-4 is an Attaché at the Mission. CC-5 is a Deputy Trade Representative at the Trade Representation of the Russian Federation in the USA, New York Office (the "Trade Representation"). The false letters from these senior Russian officials were routinely annexed to the Medicaid applications.

(iii) The Russian diplomats and their spouses also exploited other aspects of the Medicaid program. Information about the citizenship of the mother is not required on Medicaid applications because a child born in the United States is presumed to acquire United States citizenship upon birth. But almost all of the children born to Russian diplomats and their spouses do not acquire United States citizenship upon birth. Certain of the defendants lied about the citizenship status of their children in order to obtain continuing health coverage for their child. By falsely reporting that their child was a United States citizen, when, in fact, the child was a Russian citizen, the Medicaid coverage for the child was allowed to continue.

(iv) The Russian diplomats and their spouses generally applied for Medicaid benefits at the same hospital located in New York, New York (the "Hospital") or through the mail to NYCHRA offices in New York, New York. All of the defendants named in this Complaint applied for benefits at the Hospital or renewed their applications by mailing them to the NYCHRA offices in New York, New York.

12. Before, during, and after the time that the Russian diplomats and their spouses applied for and received Medicaid benefits, they also generally spent tens of thousands of dollars on ordinary goods, as well as on non-essential and luxury goods, including luxury vacations. Purchases such as luxury watches, clothes, shoes, jewelry, and other non-essential items were made by the defendants, at luxury retailer stores and outlets in New York such as Swarovski, Bloomingdale's, Tiffany & Co., Jimmy Choo, and others. Many of the Russian diplomats and their spouses, including the defendants, also spent tens of thousands of dollars on electronic merchandise at various locations, including Apple online and retail stores, and made purchases of luxury items such as concert tickets and robotic cleaning

devices. The pattern of spending by the Russian diplomats and their spouses, including the defendants, is generally inconsistent with the grossly underreported incomes claimed on the Medicaid applications.

13. As of the date of the filing of this Complaint, MIKHAIL KULESHOV, ANNA KULESHOVA, ANDREY ARTASOV, NATALIYA ARTASOVA, SERGEY OGURTSOV, TATIANA OGURTSOVA, VYACHESLAV SERGEEV, OLGA TRUBNIKOVA, ANDREY DEMIN, ALLA DEMINA, and ANDREY SAVUSHKIN, the defendants, currently live and work in the United States; each is either an accredited Russian diplomat or the spouse of a Russian diplomat. As of the date of the filing of this Complaint, EKATERINA SAVUSHKINA, OLGA KOKHANOVA, ALEXEY KOKHANOV, TIMUR SALOMATIN, NAILYA BABAEVA, MIKHAIL KORNEEV, NATALIYA KORNEEVA, ANDREY BOBYLEV, EKATERINA BOBYLEVA, VITALY SAGURA, YAROSLAVA LAZAREVA, ROMAN LYUBUSHKIN, ELENA LYUBUSHKINA, ANDREY SOKOLOV, MARINA BARYSHNIKOVA, KONSTANTIN BELYAEV, DARIA BELYAEVA, YURIY SPIRIN, ANNA SPIRINA, VICTOR VINOGRADOV, ALEXANDRA VINOGRADOVA, DANIIL MOKIN, ANNA MOKINA, ALEXANDER BEYKUN, ELENA BEYKUN, SERGEY SHCHERBAKOV, OLESYA NOVIKOVA, DENIS ARINUSHKIN, EVGENIA ARINUSHKINA, ANDREY SHAMIN, EKATERINA SHAMINA, ANDREY KALININ, IRINA SHIRSHOVA, OLEG KRAVCHENKO, OLESYA KRAVCHENKO, VITALY KONDRATENKO, NATALIYA KONDRATENKO, and ALEXEY SKORODUMOV, the defendants, previously worked and resided in the United States; each as an accredited Russian diplomat or the spouse of a Russian diplomat.

BACKGROUND: MEDICAID ELIGIBILITY

14. From my training and experience, review of documents from the United States Department of Health and Human Services ("HHS"), New York State Department of Health ("NYDOH"), New York City Human Resources Administration ("NYCHRA") and other documents, and from conversations with employees of the United States Department of Health and Human Services, NYDOH, NYCHRA, and others, I have learned the following:

a. Medicaid is a health benefits program in the United States designed to assist families and individuals with low income afford health care. Medicaid applicants can also fall within certain categories, which include pregnant women, children below a certain age, and low-income seniors, among others. Medicaid recipients generally must be citizens of the United States or qualified immigrants, except as set forth below. Diplomats, including spouses and children of diplomats, are not considered to be qualified immigrants.

b. The Medicaid program is largely federally funded, but it is administered by the states. The NYDOH administers the Medicaid program in New York State, but HHS provides a significant amount of the funding annually to the NYDOH to fund and/or reimburse the costs of the Medicaid program, including services for prenatal, post-partum, first-year-of-life care, and continuing health care for young children, among other things.

c. In New York City, the department that oversees the Medicaid program is NYCHRA, which processes applications for health insurance plans falling within the Medicaid program in its offices in New York, New York.

d. In New York State, pregnant women applying for Medicaid complete an "Access NY Healthcare" application and are "presumptively eligible" for Medicaid benefits. "Presumptive eligibility" is a mechanism by which prenatal care is immediately provided without cost to the mother pending a full Medicaid eligibility determination. To determine whether the applicant is "presumptively eligible," the provider performs a preliminary assessment of the pregnant woman's income and, if applicable, her spouse's income. During the initial intake process, the pregnant woman generally provides documentation or self-attests to information about the size of her household and the income level of the household in order to determine if the pregnant woman is entitled to Medicaid benefits. Based on my involvement in the investigation and my review of an undercover video, I know that, if a pregnant woman applying for "Access NY Healthcare" provides an income amount that is above the Medicaid eligibility level, the provider will generally not process the application.

e. Proof of United States citizenship is not required for a pregnant woman completing an "Access NY Healthcare" application. Information about the mother's citizenship is not required on the Medicaid application because the unborn child is presumed to acquire United States citizenship upon his or her birth in the United States. In addition, information about additional resources of the household, other than the monthly household income, is not required for an "Access NY Healthcare" application for pregnancy benefits. Supplemental information about household resources is typically required for individuals seeking non-pregnancy Medicaid benefits.

f. Once a pregnant woman is deemed "presumptively eligible," she receives benefits on the initial "Access NY Healthcare" application until her sixtieth post-partum day. In

addition, the newborn child is covered under the mother's initial "Access NY Healthcare" application until the child's first birthday. If the mother wishes to renew her Medicaid benefits for herself or her child, she must complete a renewal application that must include statements by the applicant regarding household income and size, as well as citizenship.

g. Whether a person is entitled to Medicaid benefits, and, if entitled, the amount to which that person is entitled, are based, in part, on the reported household income and size. That information is compared to a Medicaid eligibility chart, which is issued at least once each year and is tied to the federal poverty level. Individuals who make more than the income monthly limit for their reported household size are not eligible for prenatal Medicaid services.

h. Proof of citizenship or status within the United States is required for non-pregnancy Medicaid applications. A diplomat is generally not entitled to Medicaid benefits unless it is an emergency. If a diplomat attempts to obtain Medicaid coverage for his or her child who is not a United States citizen, that application would be rejected unless the child was in need of emergency treatment.

i. The "Access NY Healthcare" application provides applicants with the ability to simultaneously apply for the Special Supplemental Nutrition Program for Women, Infants, and Children ("WIC"). WIC offers nutrition assessment and education and monthly checks for nutritious food such as milk, cereal, fruits, and baby food, among other things. To qualify for WIC, individuals must live in New York State, meet income guidelines, and have a nutritional need. According to the WIC documents, an individual who receives Medicaid is "income eligible" for WIC.

BACKGROUND: RUSSIAN DIPLOMATS IN THE UNITED STATES

15. Based on my training and experience, my knowledge of the investigation, my review of documents and records, and my discussions with representatives of the United States Department of State (the "State Department"), I have learned the following:

a. The Mission and the Consulate are accredited by the State Department. Russian nationals employed by the Mission and the Consulate are typically issued non-immigrant, diplomatic visas to reside and work for the Russian government in the United States. In addition, the Trade Representation is a State Department-accredited office of the Russian government in the

United States and its employees are typically issued non-immigrant, diplomatic visas to reside and work for the Russian government in the United States.

b. While in the United States, the individuals employed by the Mission, Consulate, and Trade Representation are paid a salary by the Russian government. As an employee of the Mission or the Consulate, the Russian individual and his or her family are entitled to and generally live in housing, the vast majority of which is paid for by the Russian government. Employees of the Trade Representation generally also enjoy housing benefits.

c. Each of the defendants named in this Complaint is or was either: (i) a Russian national working at the Mission, the Consulate, or the Trade Representation or (ii) a Russian national married to an individual working at the Mission, the Consulate, or the Trade Representation.

d. As a result of an international convention among multiple nations and a bilateral agreement between the United States and Russia, children born in the United States to Russian diplomats generally do not acquire United States citizenship.¹

e. Any income paid to a Russian diplomat is not subject to U.S. federal, state, or local taxes. In addition, Russian diplomats employed by the Mission, the Consulate, and the Trade Representation, are permitted to use tax-exempt status documentation.

16. Based on my review of bank records and billing records of various medical facilities in New York City, I have learned the following:

a. The Mission and the Consulate historically pay for the medical expenses of its employees and their dependents, including hospital and doctor bills, as well as dental expenses.²

1 Based on my discussions with representatives of the State Department, I know that children born to certain lower-level members of the Mission staff are not covered by the bilateral agreement and therefore any children born in the United States to those staffers become American citizens.

2 I have reviewed a copy of a letter signed by a diplomat at the Mission that was provided to a medical facility in Westchester County, New York (the "Medical Facility") in an effort to obtain Emergency Medicaid coverage for a Russian diplomat's \$285,657 medical bill at the Medical Facility. In the letter, the diplomat claimed that the Russian government provided no "statutory health insurance" to pay the medical expenses of its employee and described the employee as a "low income" individual. The author of the

For example, I have reviewed a letter from the Mission to a New York City hospital in which the Mission identifies itself, in substance and in part, as the party responsible for the financial charges relating to the surgery and medical services of a particular patient, who is a dependent of a diplomat. In addition, I have reviewed numerous bills addressed to the Mission seeking payment for medical services rendered to diplomats and/or their dependents, and have also seen numerous checks drawn on Mission and Consulate bank accounts that pay such bills.

b. In or about June 2011, the Russian nationals employed by the Mission, including certain of the defendants, began to receive direct deposits payments of their salaries. Prior to June 2011, Russian nationals employed by the Mission, including certain of the defendants received their salaries in cash. Many of the defendants deposited at least some portion (but not necessarily all) of their cash salaries into United States bank accounts. Prior to June 2011, the Russian nationals employed by the Consulate and Trade Representation received intermittent direct deposits of their salaries or received cash.

THE SCHEME TO DEFRAUD THE UNITED STATES

17. As set forth in detail below, the defendants engaged in a coordinated scheme to defraud Medicaid by making material misrepresentations on their Medicaid applications, which qualified them and/or their children for benefits they were not otherwise entitled to receive. Any reference to the diplomatic positions held by the defendants is limited to the positions held around the time of the submission of the Medicaid applications described herein, and does not include any other diplomatic positions the defendants may have held in the United States.

MIKHAIL KULESHOV and ANNA KULESHOVA

18. Based on my review of State Department and NYCHRA records, I know the following:

letter, however, failed to inform the Medical facility of the Mission's and the Consulate's standard practice, as outlined more fully above, of paying for the medical expenses of its employees - including radiology services and dental care, as set forth in detail above and as evidenced by the countless payments made by the Mission and the Consulate for medical expenses incurred by diplomats working at the Mission and the Consulate.

a. MIKHAIL KULESHOV and ANNA KULESHOV, the defendants, have been married since at least 2011, the year that the State Department issued diplomatic visas to them.

b. KULESHOV is currently employed as a Second Secretary and was formerly a staff member at the Mission and resides in the United States on a diplomatic visa. As KULESHOV's wife, KULESHOVA also resides in the United States on a diplomatic visa. KULESHOV and KULESHOVA currently live in the Bronx, New York, in housing owned and paid for by the Russian government.

c. While in the United States, KULESHOVA gave birth to a child. The child did not acquire United States citizenship at birth.

19. Based on my review of NYCHRA documents, I know the following:

a. On or about May 22, 2012, ANNA KULESHOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, KULESHOVA represented the information she provided to be true under penalty of perjury. At the time of KULESHOVA's application, the Medicaid eligibility income monthly limit was \$3,182 for a household of the size that she reported.

b. In the application and supporting documents, MIKHAIL KULESHOV, the defendant, and KULESHOVA made the following false statements:

(i) KULESHOV and KULESHOVA falsely stated that the only members of the household were KULESHOVA, an older child, and the unborn child. As set forth above in paragraph 18(a), KULESHOVA and KULESHOV were married before the application for Medicaid was submitted and lived together in the Bronx, New York. KULESHOVA failed to report KULESHOV as a member of her household. In a supporting document, KULESHOV falsely claimed to be KULESHOVA's brother.

(ii) KULESHOV and KULESHOVA falsely reported that no one in the household had any income. KULESHOV and KULESHOVA failed to report KULESHOV's income from the Mission.

c. Based on the misrepresentations in their initial application and their renewal application, KULESHOVA and her

child received almost \$21,000 in Medicaid benefits that they would not otherwise have been entitled to.

20. Based on my review of bank records, credit card records, store receipts and other documents, I know the following:

a. From January 2012 through December 2012, during the time that MIKHAIL KULESHOV, the defendant, falsely claimed he was the brother of ANNA KULESHOVA, the defendant, KULESHOV received payroll deposits from the Russian government totaling over \$59,000. KULESHOV's monthly income from the Mission was approximately \$4,917 a month.

b. In July 2011, prior to the Medicaid application, MIKHAIL KULESHOV applied for a credit card (the "KULESHOV Credit Card") from a particular bank and represented his income to be \$50,000. From July 2011 to December 2011, total purchases made and paid for on the KULESOV Credit Card were approximately \$18,870. Of these purchases, over \$4,500 was spent at retailers such as Lord & Taylor and the Saks Fifth Avenue Outlet stores. In 2012, total purchases made and paid for on the KULESHOV Credit Card was approximately \$34,190. From approximately January to June 2013, total purchases made and paid for on the KULESHOV Credit Card was approximately \$24,400.

c. On May 15, 2013, while his child was still receiving Medicaid benefits, KULESHOV applied for a credit card from a certain retail store and represented that he made \$69,996 a year in income.

21. Based on my review of NYDOH Medicaid eligibility materials for the year 2012, I know that ANNA KULESHOVA, the defendant, would not have been eligible for Medicaid benefits had KULESHOVA and MIKHAIL KULESHOV, the defendant, truthfully reported (i) the size of their household, and (ii) KULESHOV's income at the Mission.

ANDREY ARTASOV and NATALIYA ARTASOVA

22. Based on my review of State Department and NYCHRA records, I know the following:

a. ANDREY ARTASOV and NATALIYA ARTASOVA, the defendants, have been married since at least in or about November 2004, the month and year that the State Department issued diplomatic visas to them.

b. ARTASOV is currently employed as a First Secretary at the Mission and resides in the United States pursuant to a diplomatic visa. As ARTASOV's wife, ARTASOVA also resides in the United States on a diplomatic visa. ARTASOV and ARTASOVA currently live in the Bronx, New York, in housing owned and paid for by the Russian government.

c. While in the United States on a diplomatic visa, ARTASOVA received medical care for a pregnancy.

23. Based on my review of NYCHRA documents, I know the following:

a. On or about November 19, 2008, NATALIYA ARTASOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, ARTASOVA represented the information she provided to be true under penalty of perjury. At the time of ARTASOVA's application, the Medicaid eligibility income monthly limit was \$3,534 for the household size she reported.

b. In the application, ARTASOVA falsely stated that her husband, ANDREY ARTASOV, the defendant, earned only \$2,900 a month.

c. In support of ARTASOVA's application, ARTASOVA and ARTASOV submitted a letter dated October 22, 2008, signed by CC-1, in which CC-1 falsely reported that ARTASOV made \$2,900 a month in income at the Mission.

d. Based on the misrepresentations in the initial application, ARTASOVA received almost \$1,200 from November 2008 to March 2009, in Medicaid benefits that she would not otherwise have been entitled to.

24. Based on my review of bank records, credit card records, store receipts and other documents, I know the following:

a. In March 2007, prior to the Medicaid application, ANDREY ARTASOV, the defendant, applied for a credit card ("ARTASOV Credit Card-1") from a particular bank and represented his income to be \$60,000 a year as a Second Secretary, the same position ARTASOV represented in ARTASOVA's Medicaid application a year later. In 2008, the year that NATALIYA ARTASOVA, the defendant, applied for Medicaid benefits, ARTASOV and ARTASOVA

made and paid for over \$48,100 in purchases on the ARTASOV Credit Card-1. These purchases included: (i) approximately \$4,500 at Swarovski retail locations, and (ii) approximately \$3,500 at Apple.

b. ARTASOV maintained a bank account at a particular bank (the "ARTASOV Bank Account"). During the year 2008, prior to the payroll direct deposits, almost \$53,000 of cash, interest, and transfers was deposited into the ARTASOV Bank Account.

c. During the years 2007-2009, ARTASOV and ARTASOVA also purchased approximately \$16,500 worth of merchandise from Lord & Taylor.

d. In 2008, ARTASOV made and paid for over \$20,000 in purchases on yet another credit card.

25. Based on my review of NYDOH Medicaid eligibility materials for the year 2008, I know that NATALIYA ARTASOVA, the defendant, would not have been eligible for Medicaid benefits, had ANDREY ARTASOV and NATALIYA ARTASOVA, the defendants, truthfully reported ARTASOV's income at the Mission.

SERGEY OGURTSOV and TATIANA OGURTSOVA

26. Based on my review of State Department and banking records, I know the following:

a. SERGEY OGURTSOV and TATIANA OGURTSOVA, the defendants, have been married since at least in or about August 2010, the month and year that the State Department issued diplomatic visas to them.

b. OGURTSOV is employed at the Mission and resides in the United States pursuant to a diplomatic visa. According to bank records, OGURTSOVA receives payroll deposits from the Russian government. It is therefore apparent that she also works for the Russian government. OGURTSOVA also resides in the United States on a diplomatic visa. OGURTSOV and OGURTSOVA currently live in the Bronx, New York, in housing owned and paid for by the Russian government.

c. During the time that she resided in the United States, OGURTSOVA gave birth to a child. The child did not acquire United States citizenship.

27. Based on my review of NYCHRA documents, I know the following:

a. On or about January 11, 2011, TATIANA OGURTSOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, OGURTSOVA represented the information she provided to be true under penalty of perjury. At the time of OGURTSOVA's application, the Medicaid eligibility income monthly limit was \$4,362 for the household size she reported.

b. In the application, OGURTSOVA falsely stated that her husband, SERGEY OGURTSOV, the defendant, earned only \$3,500 a month. OGURTSOVA also failed to report any income she received from the Russian government.

c. In support of OGURTSOVA's application, OGURTSOV and OGURTSOVA submitted a letter dated January 14, 2011, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that OGURTSOV made \$3,500 a month in income at the Mission.

d. Based on the misrepresentations in the initial application, OGURTSOVA and her child received over \$19,900 in Medicaid benefits from approximately January 2011 up to and including January 2012 that she would not otherwise have been entitled to.

28. Based on my review of bank records, credit card records, and other documents, I know the following:

a. Beginning in June 2011 and ending in December 2011, during the time that TATIANA OGURTSOVA, the defendant, received Medicaid benefits, SERGEY OGURTSOV, the defendant, received payroll deposits from the Russian government totaling almost \$40,000. OGURTSOV's average monthly income during that time was therefore approximately \$5,675 a month, almost \$2,175 a month more than OGURTSOV and OGURTSOVA reported to Medicaid on their initial application in January 2011. In addition, between June 2011 and December 2011, during the time that OGURTSOVA received Medicaid benefits, OGURTSOVA received payroll deposits from the Russian government totaling approximately \$9,561. OGURTSOVA continued to receive a salary from the Russian government until at least in or about January 2013.

b. OGURTSOV maintains a credit card through a particular bank ("OGURTSOV Credit Card-1"). In 2011, OGURTSOV

made and paid for at least approximately \$38,318 in purchases on OGURTSOV Credit Card-1.

29. Based on my review of NYDOH Medicaid eligibility materials for the year 2011, I know that TATIANA OGURTSOVA, the defendant, would not have been eligible for Medicaid benefits, had SERGEY OGURTSOV and TATIANA OGURTSOVA, the defendants, truthfully reported OGURTSOV's salary at the Mission.

ALEXEY KOKHANOV and OLGA KOKHANOVA

30. Based on my review of State Department records, I know the following:

a. ALEXEY KOKHANOV and OLGA KOKHANOVA, the defendants, have been married since at least in or about October 2005, the month and year that the State Department issued diplomatic visas for them.

b. KOKHANOV was employed at the Consulate and resided in the United States pursuant to a diplomatic visa. As a dependent of KOKHANOV, KOKHANOVA resided in the United States on a diplomatic visa. KOKHANOV and KOKHANOVA previously lived in New York, New York during KOKHANOV's diplomatic tour of duty.

c. During the time that she resided in the United States, KOKHANOVA gave birth to a child. The child did not acquire United States citizenship.

31. Based on my review of NYCHRA documents, I know the following:

a. In or about February 2007, OLGA KOKHANOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, KOKHANOVA represented the information she provided to be true under penalty of perjury. At the time of KOKHANOVA's application, the Medicaid eligibility income monthly limit was \$4,005 for the household size she reported.

b. In the application, KOKHANOVA falsely stated that her husband, ALEXEY KOKHANOV, the defendant, earned only \$22,000 per year, which would equal approximately \$1,833 a month.

c. In support of KOKHANOVA's application, KOKHANOV and KOKHANOVA submitted a letter dated January 24, 2007, signed by

CC-2 in which CC-2 falsely reported that KOKHANOV made \$22,000 a year in income at the Consulate.

d. Based on the misrepresentations in the initial application, KOKHANOVA and her child received over \$31,000 in Medicaid benefits from approximately February 2007 up to and including September 2010 that she would not otherwise have been entitled to.

32. Based on my review of bank records, credit card records, and other documents, I know that KOKHANOV maintained a bank account at a particular bank (the "KOKHANOV Bank Account"). During the year 2007, approximately \$59,000 of cash, transfers, or interest was deposited into the KOKHANOV Bank Account. In 2008, approximately \$81,000 of cash, transfers, or interest, was deposited into the KOKHANOV Bank Account. In 2009, almost \$73,000 of cash, transfers, or interest, was deposited into the KOKHANOV Bank Account. KOKHANOV also maintained a large certificate of deposit at the same bank, which generated approximately \$1,700 in interest that was required to be disclosed in the Medicaid application (but was not disclosed), in addition to the income above.

33. Based on my review of NYDOH Medicaid eligibility materials for the year 2007, I know that OLGA KOKHANOVA, the defendant, would not have been eligible for Medicaid benefits, had ALEXEY KOKHANOV and OLGA KOKHANOVA, the defendants, truthfully reported KOKHANOV's salary at the Consulate.

VYACHESLAV SERGEEV and OLGA TRUBNIKOVA

34. Based on my review of State Department records, I know the following:

a. VYACHESLAV SERGEEV and OLGA TRUBNIKOVA, the defendants, have been married since at least in or about July 2010, the month and year that their diplomatic visas were issued by the State Department.

b. SERGEEV is employed as an Attaché at the Mission and is in the United States pursuant to a diplomatic visa. As SERGEEV's wife, TRUBNIKOVA also resides in the United States on a diplomatic visa. SERGEEV and TRUBNIKOVA currently live in the Bronx, New York, in housing owned and paid for by the Russian government.

c. While in the United States, TRUBNIKOVA gave birth. The child did not acquire United States citizenship.

35. Based on my review of NYCHRA documents, I know the following:

a. In or about September 2010, OLGA TRUBNIKOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, TRUBNIKOVA represented the information she provided to be true under penalty of perjury. At the time of TRUBNIKOVA's application, the Medicaid eligibility income monthly limit was \$3,052 for the household size she reported.

b. In the application, TRUBNIKOVA falsely stated that her husband, VYACHESLAV SERGEEV, the defendant, earned only \$2,800 a month in income.

c. In support of TRUBNIKOVA's application, TRUBNIKOVA and SEGREEV submitted a letter dated September 28, 2010, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that SERGEEV made only \$2,800 a month in income at the Mission.

d. Based on the misrepresentations in the initial application, TRUBNIKOVA and her child received almost \$21,000 from September 2010 to January 2012 in Medicaid benefits that they would not otherwise have been entitled to.

36. Based on my review of bank records, credit card records, and other documents, I know that beginning from in or about June 2011 through in or about December 2011, during the time that OLGA TRUBNIKOVA, the defendant, and her child received Medicaid benefits, VYACHESLAV SERGEEV, the defendant, received payroll deposits from the Russian government totaling almost \$33,000 in a particular bank account (the "SERGEEV Account"). SERGEEV's average monthly income during that time was therefore approximately \$4,585 a month, over \$1,500 a month more than TRUBNIKOVA and SERGEEV reported to Medicaid on their initial application in September 2010, and well above the eligibility threshold. In addition, SERGEEV received payroll deposits from the Russian government of over \$54,667 from January 2012 to December 2012. In 2011, SERGEEV also withdrew approximately \$22,000 in cash from the SERGEEV Account.

37. Based on my review of NYDOH Medicaid eligibility materials for the year 2010, I know that OLGA TRUBNIKOVA, the

defendant, would not have been eligible for Medicaid benefits, had VYACHESLAV SERGEEV and OLGA TRUBNIKOVA, the defendants, truthfully reported SERGEEV's salary at the Mission.

ANDREY DEMIN and ALLA DEMINA

38. Based on my review of State Department and NYCHRA records, I know the following:

a. ANDREY DEMIN and ALLA DEMINA, the defendants, have been married since at least in or about September 2004, the month and year that the State Department issued diplomatic visas for them.

b. DEMIN is currently employed as a Counselor and previously was a First Secretary at the Mission and is in the United States pursuant to a diplomatic visa. As DEMIN's wife, DEMINA also resides in the United States on a diplomatic visa. DEMIN and DEMINA currently live in the Bronx, New York, in housing owned and paid for by the Russian government.

c. During the time that she resided in the United States, DEMINA gave birth to a child. The child did not acquire United States citizenship.

39. Based on my review of NYCHRA documents, I know the following:

a. In or about November 2006, ALLA DEMINA, the defendant, was accepted for pregnancy Medicaid benefits. In or about June 2007, DEMINA also completed a renewal application for Medicaid benefits by mail (the "June 2007 Application"). At the time of DEMINA's June 2007 Application, the Medicaid eligibility income monthly limit was \$3,442 for the household size she reported.

b. In the June 2007 Application, DEMINA falsely stated that her husband, ANDREY DEMIN, the defendant, earned only \$2,200 a month in income.

c. In support of DEMINA's June 2007 Application, DEMIN and DEMINA submitted a letter dated June 10, 2007, signed by CC-1, in which CC-1 falsely reported that DEMIN made \$2,200 a month in salary at the Mission as a First Secretary.

d. Based in part on the misrepresentations in the June 2007 Application, DEMINA and her child continued to receive

Medicaid benefits. Between December 2006 to September 2008, DEMINA and her child received \$22,200 in Medicaid benefits that they would not otherwise have been entitled to.

40. Based on my review of bank records, credit card records, and other documents, I know the following:

a. In 2007, prior to the time that the Russian government began direct deposits of payroll for employees of the Mission, ANDREY DEMIN, the defendant, maintained checking and savings accounts at a particular bank (the "DEMIN Savings Account," and collectively, the "DEMIN Accounts"). In 2007, over approximately \$46,600 of cash, interest, and transfers was deposited into the DEMIN Savings Account, well more than DEMIN's falsely reported annual salary of \$26,400. In 2007, DEMIN made over \$6,640 in purchases on a debit card associated with the DEMIN Accounts.

b. In 2008, DEMIN and DEMINA also made and paid for over \$10,500 in purchases on a particular credit card, and made over \$3,100 in purchases at Lord & Taylor between 2007-2009.

c. In July 2008, during the time that DEMINA and her child received Medicaid benefits, DEMIN and DEMINA spent over \$2,700 on a vacation to Las Vegas, Hollywood, and San Francisco.

41. Based on my review of NYDOH Medicaid eligibility materials for the years 2006 and 2007, I know that ALLA DEMINA, the defendant, would not have been eligible for Medicaid benefits, had ANDREY DEMIN and ALLA DEMINA, the defendants, truthfully reported DEMIN's salary at the Mission.

ANDREY SAVUSHKIN and EKATERINA SAVUSHKINA

42. Based on my review of State Department and NYCHRA records, I know the following:

a. ANDREY SAVUSHKIN and EKATERINA SAVUSHKINA, the defendants, have been married since at least in or about January 2005, the month and year that they were issued diplomatic visas to the United States.

b. At the time of the Medicaid application in paragraph 42(a) below, SAVUSHKIN was employed as a Third Secretary at the Consulate and resided in the United States pursuant to a diplomatic visa. As SAVUSHKIN's wife, SAVUSHKINA also resided in the United States on a diplomatic visa. Both

lived in the New York, New York, in housing owned and paid for by the Russian government. SAVUSHKIN currently works as a Russian diplomat in the United States and lives here with SAVUSHKINA.

c. During SAVUSHKIN's diplomatic tour of duty in New York, SAVUSHKINA received medical care for a pregnancy.

43. Based on my review of NYCHRA documents, I know the following:

a. In or about July 2007, EKATERINA SAVUSHKINA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, SAUVSHKINA represented the information she provided to be true under penalty of perjury. At the time of SAVUSHKINA's application, the Medicaid eligibility income monthly limit was \$2,862 for the household size she reported.

b. In the application, SAVUSHKINA falsely stated that her husband, ANDREY SAVUSHKIN, the defendant, earned only \$21,000 a year in income. In her application, SAVUSHKINA also applied for WIC benefits.

c. In support of SAVUSHKINA's application, SAVUSHKINA and SAVUSHKIN submitted a letter dated June 25, 2007 and signed by CC-3. CC-3 falsely reported that SAVUSHKIN made \$21,000 a year in income at the Consulate.

d. Based on the misrepresentations in the application, SAVUSHKINA received over \$730 from July 2007 to October 2007 in Medicaid benefits that she would not otherwise have been entitled to.

44. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. In 2007, ANDREY SAVUSHKIN and EKATERINA SAVUSHKINA, the defendants, maintained an account at a particular bank (the "SAVUSHKIN Account-1"). In 2007, over approximately \$43,600 of cash, interest, and transfers was deposited into SAVUSHKIN Account-1.

b. In or about October 2005, prior to the date on which SAVUSHKIN and SAVUSHKINA applied for Medicaid benefits, SAVUSHKIN applied for a credit card from a particular bank and

represented his annual salary to be \$70,000, or approximately \$5,833 a month.

c. In 2007, the year that SAVUSHKINA applied for Medicaid benefits, SAVUSHKIN and SAVUSHKINA made and paid for approximately \$35,700 in purchases using credit cards in their names.

d. In 2007, the year that SAVUSHKINA applied for Medicaid benefits, SAVUSHKIN and SAVUSHKINA made payments to another credit card company totaling over approximately \$12,700.

45. Based on my review of NYDOH Medicaid eligibility materials for the year 2007, I know that EKATERINA SAVUSHKIN, the defendant, would not have been eligible for Medicaid benefits, had EKATERINA SAVUSHKINA and ANDREY SAVUSHKIN, the defendants, truthfully reported SAVUSHKIN's salary at the Consulate.

TIMUR SALOMATIN and NAILYA BABAEVA

46. Based on my review of State Department and NYCHRA records, I know the following:

a. TIMUR SALOMATIN and NAILYA BABAEVA, the defendants, have been married since at least in or about August 2010, the month and year that the State Department issued diplomatic visas for them.

b. SALOMATIN was employed as a Third Secretary at the Mission and resided in the United States pursuant to a diplomatic visa. BABAEVA also resided in the United States on a diplomatic visa. SALOMATIN and BABAEVA lived in the Bronx, New York, in housing owned and paid for by the Russian government. SALOMATIN and BABAEVA no longer work or reside in the United States.

c. During the time that she resided in the United States, BABAEVA gave birth to twins. The children did not acquire United States citizenship.

47. Based on my review of NYCHRA documents, I know the following:

a. On or about November 5, 2010, NAILYA BABAEVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application.

On her application, BABAEVA represented the information she provided to be true under penalty of perjury. At the time of BABAEVA's application, the Medicaid eligibility income monthly limit was \$3,052 for a household of the size that she reported.

b. In the application, BABAEVA falsely stated that her husband, TIMUR SALOMATIN, the defendant, earned only \$3,000 a month. In her application, BABAEVA also applied for WIC benefits.

c. In support of BABAEVA's application, BABAEVA and SALOMATIN submitted a letter dated October 27, 2010 and signed by MIHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that SALOMATIN made \$3,000 a month in income at the Mission.

d. On or about June 29, 2011, after her children were born and after the Mission began direct deposits of payroll into the bank accounts of their employees, BABAEVA submitted a Medicaid renewal application to NYCHRA. The mail renewal form is in Russian, but I have reviewed it with an interpreter. In support of the renewal application, BABAEVA and SALOMATIN submitted a letter dated June 28, 2011, signed by KORNEEV, in which KORNEEV falsely reported that SALOMATIN made \$4,400 a month in income at the Mission. In the renewal application, BABAEVA also falsely claimed to pay \$500 a month for rent.

e. Based on the misrepresentations in the initial and renewal application, BABAEVA and her children received almost \$31,000 from November 2010 to August 2012 in Medicaid benefits that they would not otherwise have been entitled to.

48. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. Beginning in June 2011 and ending in December 2011, during the time that his family continued to receive Medicaid benefits, TIMUR SALOMATIN, the defendant, received payroll deposits from the Russian government totaling over \$36,100. SALOMATIN's monthly salary during that time was approximately \$5,160 a month, over \$2,100 more per month than SALOMATIN and BABAEVA reported to Medicaid on their initial application only seven months before, and more than the \$4,400 a month she reported in late June 2011 on the renewal application. From approximately January 2012 to December 2012, SALOMATIN received

payroll deposits from the Russian government totaling over \$57,000.

b. In February 2011, shortly after SALOMATIN and BABAEVA applied for BABAEVA's Medicaid benefits, SALOMATIN applied for a credit card ("SALOMATIN Credit Card-1") from a particular bank and represented his income to be \$8,333 a month. In 2011, SALOMATIN and BABAEVA spent over \$11,200 on the SALOMATIN Credit Card-1. In 2012, SALOMATIN and BABAEVA spent over \$4,200 on SALOMATIN Credit Card-1.

c. In December 2011, while BABAEVA and SALOMATIN's children continued to receive Medicaid benefits, SALOMATIN applied for another credit card from a different bank, and represented his income to be \$60,000 a year ("SALOMATIN Credit Card-2") or \$5,000 per month. From approximately February 2012 to December 2012, during the time that the children continued to receive Medicaid benefits, SALOMATIN and BABAEVA made and paid for over \$50,000 in purchases on the SALOMATIN Credit Card-1, or an average of \$4,233 a month. Among the purchases were: (i) over \$8,400 at Apple Stores; (ii) over \$10,000 on items from Prada, Bloomingdale's, and other retail locations.

d. In 2011, while BABAEVA and the children were obtaining Medicaid benefits, SALOMATIN spent almost \$1,300 in purchases at Tiffany & Co.

49. Based on my review of NYDOH Medicaid eligibility materials for the year 2010, I know that NAILYA BABAEVA, the defendant, would not have been eligible for Medicaid benefits, had TIMUR SALOMATIN and NAILYA BABAEVA, the defendants, truthfully reported SALOMATIN's income at the Mission.

MIKHAIL KORNEEV and NATALIYA KORNEEVA

50. Based on my review of State Department and NYCHRA records, I know the following:

a. MIKHAIL KORNEEV and NATALIYA KORNEEVA, the defendants, have been married since at least in or about October 2008, the month and year that the State Department issued diplomatic visas to them.

b. KORNEEV was employed as a Counselor at the Mission and resided in the United States pursuant to a diplomatic visa. As KORNEEV's wife, KORNEEVA also resided in the United States on a diplomatic visa. KORNEEV and KORNEEVA lived in the Bronx, New

York, in housing owned and paid for by the Russian government. KORNEEV and KORNEEVA no longer live or work in the United States.

c. During the time that she resided in the United States, KORNEEVA received medical care for a pregnancy.

51. Based on my review of NYCHRA documents, I know the following:

a. On or about July 18, 2011, NATALIYA KORNEEVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, KORNEEVA represented the information she provided to be true under penalty of perjury. At the time of KORNEEVA's application, the Medicaid eligibility income monthly limit was \$3,725 for the household size she reported.

b. In the application, KORNEEVA falsely stated that her husband, MIKHAIL KORNEEV, the defendant, earned only \$3,200 a month.

c. In support of KORNEEVA's application, KORNEEV and KORNEEVA submitted a letter dated July 18, 2011, signed by CC-4, in which CC-4 falsely reported that KORNEEV made \$3,200 a month in income at the Mission.

d. Based on the misrepresentations in the initial application, KORNEEVA received almost \$3,000 from in or about July 2011 to in or about May 2012 in Medicaid benefits that they would not otherwise have been entitled to.

52. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. Beginning in June 2011 and ending in December 2011, during the time that NATALIYA KORNEEVA, the defendant, received Medicaid benefits, MIKHAIL KORNEEV, the defendant, received payroll deposits from the Russian government totaling over \$58,100, including a single large payroll deposit in late 2011. KORNEEV's average monthly income during that time was therefore approximately \$8,000 a month, almost \$5,000 more a month than KORNEEV and KORNEEVA reported to Medicaid on their initial application in July 2011, during this time period.

b. In March 2009, almost two years before KORNEEVA applied for Medicaid, KORNEEV applied for a credit card ("KORNEEV Credit Card-1") from a particular bank and represented his income to be \$5,417 a month - over \$2,000 more than was later represented to Medicaid. In 2009, KORNEEV purchased and paid for almost \$1,800 of merchandise at a fur coat store using KORNEEV Credit Card-1. In October 2009, KORNEEV purchased and paid for a luxury cruise vacation using KORNEEV Credit Card-1 for over \$3,000.

c. In April 2011, approximately three months before KORNEEVA applied for Medicaid, KORNEEV applied for another credit card ("KORNEEV Credit Card-2") from a particular bank and represented his income to be \$80,000 a year. In May 2011, approximately two months before KORNEEVA applied for Medicaid, KORNEEV purchased and paid for another luxury cruise vacation to the Caribbean for almost \$2,000 on KORNEEV Credit Card-2. During this luxury cruise vacation, KORNEEV purchased and paid for \$2,000 worth of jewelry using the KORNEEV Credit Card-2. In December 2011, KORNEEV also purchased and paid for another almost \$4,000 luxury cruise vacation using KORNEEV Credit Card-2. In 2011, KORNEEV also spent and paid for \$4,300 on purchases from Apple using the KORNEEV Credit Card-2.

53. Based on my review of NYDOH Medicaid eligibility materials for the year 2011, I know that NATALIYA KORNEEVA, the defendant, would not have been eligible for Medicaid benefits, had MIKHAIL KORNEEV and NATALIYA KORNEEVA, the defendants, truthfully reported KORNEEV's income at the Mission.

ANDREY BOBYLEV and EKATERINA BOBYLEVA

54. Based on my review of State Department records, I know the following:

a. ANDREY BOBYLEV and EKATERINA BOBYLEVA, the defendants, have been married since at least in or about September 2006, the month and year that they received diplomatic visas from the State Department.

b. BOBYLEV was employed as a Third Secretary at the Mission and resided in the United States pursuant to a diplomatic visa. As BOBYLEV's wife, BOBYLEVA also resided in the United States on a diplomatic visa. BOBYLEV and BOBYLEVA lived in the Bronx, New York, in housing owned and paid for by the Russian government. BOBYLEV and BOBYLEVA no longer work or reside in the United States.

c. During the time that she resided in the United States, BOBYLEVA gave birth to a child. The child did not acquire United States citizenship.

55. Based on my review of NYCHRA documents, I know the following:

a. In or about December 2006, EKATERINA BOBYLEVA, the defendant, received an acceptance letter from Medicaid for benefits coverage. In a 2009 Medicaid renewal application, BOBYLEVA falsely stated that her husband, ANDREY BOBYLEV, the defendant, earned only \$3,000 a month. BOBYLEVA also indicated that she had zero resources. At the time of BOBYLEVA's renewal application, the Medicaid eligibility income monthly limit was \$3,052 for the household size she reported.

b. In support of BOBYLEVA's application, BOBYLEVA and BOBYLEV submitted a letter dated April 22, 2009, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that BOBYLEV made \$3,000 a month in income at the Mission as a Third Secretary.

c. Based on the misrepresentations in the initial application, BOBYLEVA and the child received approximately \$21,350 from December 2006 to August 2009 in Medicaid benefits that they would not otherwise have been entitled to.

56. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. In December 2006, shortly after ANDREY BOBYLEV and EKATERINA BOBYLEVA, the defendants, applied for BOBYLEVA's Medicaid benefits, BOBYLEV applied for a credit card ("BOBYLEV Credit Card-1") from a particular bank and represented his income to be \$5,833 a month as a Third Secretary.

b. In or about March or April 2009, BOBYLEV applied for a credit card ("BOBYLEV Credit Card-2") from a particular bank and represented his income to be \$5,833 a month as a Third Secretary.

c. In 2008 and 2009, BOBYLEV spent over \$1,500 in purchases at Tiffany & Co.

57. Based on my review of NYDOH Medicaid eligibility materials for the years 2006 to 2009, I know that EKATERINA BOBYLEVA, the defendant, would not have been eligible for Medicaid benefits, had BOBYLEV and BOBYLEVA, the defendants, truthfully reported BOBYLEV's income at the Mission.

VITALY SAGURA and YAROSLAVA LAZAREVA

58. Based on my review of State Department and NYCHRA records, I know the following:

a. VITALY SAGURA and YAROSLAVA LAZAREVA, the defendants, have been married since at least in or about August 2006, the month and year that the State Department issued diplomatic visas for them.

b. SAGURA was employed as Third Secretary at the Consulate and resided in the United States pursuant to a diplomatic visa. As SAGURA's wife, LAZAREVA also resided in the United States on a diplomatic visa. SAGURA and LAZAREVA lived in New York, New York, in housing owned and paid for by the Russian government. SAGURA and LAZAREVA no longer work or reside in the United States.

c. During the time that she resided in the United States, LAZAREVA gave birth to a child. The child did not acquire United States citizenship.

59. Based on my review of NYCHRA documents, I know the following:

a. On or about August 13, 2007, YAROSLAVA LAZAREVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, LAZAREVA represented the information she provided to be true under penalty of perjury. At the time of LAZAREVA's application, the Medicaid eligibility income monthly limit was \$2,862 for a household of the size she reported.

b. In the application, LAZAREVA falsely stated that her husband, VITALY SAGURA, the defendant, earned only \$21,000 per year. In her application, LAZAREVA also applied for WIC benefits.

c. In support of LAZAREVA's application, LAZAREVA and SAGURA, the defendants, submitted a letter dated June 15, 2007,

signed by CC-2, in which CC-2 falsely reported that SAGURA made \$21,000 a year in income at the Consulate.

d. Based on the misrepresentations in the initial application, LAZAREVA and the child received approximately \$19,440 from August 2007 to May 2009 in Medicaid benefits that they would not otherwise have been entitled to.

60. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. In 2006, before VITALY SAGURA and YAROSLAVA LAZAREVA, the defendants, applied for Medicaid benefits, SAGURA applied for a credit card ("SAGURA Credit Card-1") from a particular bank and represented his income to be \$90,000 a year, or \$7,500 a month. In 2007, SAGURA and LAZAREVA made and paid for over \$42,000 in purchases on the SAGURA Credit Card-1. In 2008, SAGURA and LAZAREVA made and paid for over \$32,500 in purchases on the SAGURA Credit Card-1. Among the purchases in 2007 and 2008 were: (i) a limousine rental in April 2007; (ii) a chartered helicopter in October 2007; (iii) a purchase in August 2008 from irobot.com, a website that sells robotic cleaning devices.

b. In 2007, three months before SAGURA and LAZAREVA applied for Medicaid benefits, SAGURA applied for a credit card ("SAGURA Credit Card-2") from a particular bank and represented his income to be \$80,000 a year.

c. From 2007 until 2008, SAGURA spent over \$8,000 in purchases at Tiffany & Co., over \$7,000 of which were made after LAZAREVA and the child obtained Medicaid benefits.

61. Based on my review of NYDOH Medicaid eligibility materials for the years 2007 to 2009, I know that YAROSLAVA LAZAREVA, the defendant, would not have been eligible for Medicaid benefits, had LAZAREVA and VITALY SAGURA, the defendants, truthfully reported SAGURA's salary at the Consulate.

ROMAN LYUBUSHKIN and ELENA LYUBUSHKINA

62. Based on my review of State Department and NYCHRA records, I know the following:

a. ROMAN LYUBUSHKIN and ELENA LYUBUSHKINA, the defendants, have been married since at least in or about October 2008, the month and year that the State Department issued diplomatic visas for them.

b. LYUBUSHKIN was employed as a Staff Member at the Trade Representation and resided in the United States pursuant to a diplomatic visa. As LYUBUSHKIN's wife, LYUBUSHKINA also resided in the United States on a diplomatic visa. LYUBUSHKIN and LYUBUSHKINA lived in the Bronx, New York. LYUBUSHKIN and LYUBUSHKINA no longer work or reside in the United States.

c. During the time that she resided in the United States, LYUBUSHKINA received medical care for a pregnancy.

63. Based on my review of NYCHRA documents, I know the following:

a. On or about January 25, 2011, ELENA LYUBUSHKINA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application (the "January 2011 Application"). On her application, LYUBUSHKINA represented the information she provided to be true under penalty of perjury. At the time of LYUBUSHKINA'S application, the Medicaid eligibility income monthly limit was \$3,725 for the household size she reported.

b. In the application, LYUBUSHKINA falsely stated that her husband, ROMAN LYUBUSHKIN, the defendant, earned only \$2,860 a month (\$34,320 per year). In her application, LYUBUSHKINA also applied for WIC benefits.

c. In support of LYUBUSHKINA'S application, LYUBUSHKINA and LYUBUSHKIN, the defendants, submitted a letter dated January 17, 2011, signed by CC-5, in which CC-5 falsely reported that LYUBUSHKIN made \$2,860 a month in salary at the Trade Representation.

d. On or about August 11, 2011, LYUBUSHKINA submitted a Medicaid renewal application to NYCHRA. In support of the renewal application, LYUBUSHKIN and LYUBUSHKINA submitted a letter dated August 9, 2011, signed by CC-5, in which CC-5 falsely reported that LYUBUSHKIN made \$2,860 a month in income at the Trade Representation.

e. Based on the misrepresentations in the initial application, LYUBUSHKINA and her child received approximately

\$18,940 from February 2011 to February 2012 in Medicaid benefits that they would not otherwise have been entitled to.

64. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. In October 2009, before ROMAN LYUBUSHKIN and ELENA LYUBUSHKINA, the defendants, applied for Medicaid benefits, LYUBUSHKIN opened a bank account at a particular bank and represented his income to be \$5,500 a month (\$66,000 a year). LYUBUSHKIN provided a letter to the bank signed by CC-5, in which CC-5 reported the higher salary level.

b. In 2010 and 2011, LYUBUSHKIN received deposits, including cash, interest, and transfers, into a bank account totaling over \$100,000 each year. In 2011, over approximately \$111,000 in cash, interest, and transfers, was deposited in the account while LYUBUSHKINA and the child were receiving Medicaid benefits.

65. Based on my review of NYDOH Medicaid eligibility materials for the year of 2011, I know that ELENA LYUBUSHKINA, the defendant, would not have been eligible for Medicaid benefits, had LYUBUSHKIN and LYUBUSHKINA's, the defendants, truthfully reported LYUBUSHKIN's salary at the Trade Representation.

ANDREY SOKOLOV and MARINA BARYSHNIKOVA

66. Based on my review of State Department records, I know the following:

a. ANDREY SOKOLOV and MARINA BARYSHNIKOVA, the defendants, have been married since at least in or about May 2010, the month and year that the State Department issued diplomatic visas for them.

b. SOKOLOV was employed as an Attaché and a Staff Member at the Mission and resided in the United States pursuant to a diplomatic visa. As SOKOLOV's wife, BARYSHNIKOVA also resided in the United States on a diplomatic visa. SOKOLOV and BARYSHNIKOVA no longer work or reside in the United States.

67. Based on my review of NYCHRA documents, I know the following:

a. On or about November 23, 2011, MARINA BARYSHNIKOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, BARYSHNIKOVA represented the information she provided to be true under penalty of perjury. At the time of BARYSHNIKOVA'S application, the Medicaid eligibility income monthly limit was \$3,725 for a household of the size she reported.

b. In the application, BARYSHNIKOVA falsely stated that her husband, ANDREY SOKOLOV, the defendant, earned only \$3,500 a month.

c. In support of BARYSHNIKOVA'S application, BARYSHNIKOVA and SOKOLOV, the defendants, later submitted a letter dated December 8, 2011, signed by KONSTANTIN BELYVAEV, the defendant, in which BELYVAEV falsely reported that SOKOLOV made \$3,500 a month in income.

d. Based on the misrepresentations in the initial application, BARYSHNIKOVA received approximately \$3,788 from December 2011 to September 2012 in Medicaid benefits that she would not otherwise have been entitled to.

68. Based on my review of bank records, airline records, credit card records, store receipts, and other documents, I know the following:

a. From June 2011 until December 2011, during the time that MARINA BARYSHNIKOVA, the defendant, received Medicaid benefits, ANDREY SOKOLOV, the defendant, received payroll deposits from the Russian government of approximately \$4,356 a month.

b. In September 2011, SOKOLOV spent approximately \$1,848 at Tiffany & Co.

c. SOKOLOV purchased numerous airline tickets in 2012, including: (i) round trip airfare between Boston and Hawaii in March 2012; (ii) round trip airfare to Turks and Cacaos in August 2012; and (iii) round trip airfare to Cancun, Mexico in December 2012.

69. Based on my review of NYDOH Medicaid eligibility materials for the years of 2011 and 2012, I know that MARINA BARYSHNIKOVA, the defendant, would not have been eligible for

Medicaid benefits, had BARYSHNIKOVA and SOKOLOV, the defendants, truthfully reported SOKOLOV's salary at the Mission.

KONSTANTIN BELYAEV and DARIA BELYAEVA

70. Based on my review of State Department records, I know the following:

a. KONSTANTIN BELYAEV and DARIA BELYAEVA, the defendants, have been married since at least approximately April 2008, the month and year that the State Department issued diplomatic visas for them.

b. BELYAEV was employed as a Second Secretary at the Mission and was in the United States pursuant to a diplomatic visa. As BELYAEV's wife, BELYAEVA also resided in the United States on a diplomatic visa. BELYAEV and BELYAEVA lived in the Bronx, New York, in housing owned and paid for by the Russian government. BELYAEV and BELYAEVA no longer work or reside in the United States.

c. During the time that she resided in the United States, BELYAEVA gave birth to a child. The child did not acquire United States citizenship.

71. Based on my review of NYCHRA documents, I know the following:

a. In or about December 2009, DARIA BELYAEVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application.³ On her application, BELYAEVA represented the information she provided to be true under penalty of perjury. At the time of BELYAEVA's application, the Medicaid eligibility income monthly limit was \$3,675 for the household size she reported.

b. In the application, BELYAEVA falsely stated that her husband, KONSTANTIN BELYAEV, the defendant, earned only \$3,000 a month.

³ The document is dated "12/29/10"; however, I believe that the document was actually submitted and signed in December 2009 because BELYAEVA first received prenatal Medicaid coverage in early January 2010, and her child was born in mid-2010 and therefore had to have applied before December 2010. Also, the letter submitted in support of her application is dated December 9, 2009, as set forth in the next paragraph.

c. In support of BELYAEVA's application, BELYAEVA and BELYAEV submitted a letter dated December 9, 2009, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that BELYAEV made \$3,000 a month in income at the Mission.

d. Based on the misrepresentations in the initial application, BELYAEVA and her child received approximately \$20,900 from January 2010 to October 2011 in Medicaid benefits that they would not otherwise have been entitled to.

72. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. Beginning in June 2011 and ending in December 2011, during the time that DARIA BELYAEVA, the defendant, and her child received Medicaid benefits, KONSTANTIN BELYAEV, the defendant, received payroll deposits from the Russian government totaling over \$28,300. BELYAEV's average monthly income during that time was therefore approximately \$4,042 a month, over \$1,000 a month more than BELYAEV and BELYAEVA reported to Medicaid on their initial application in December 2009. In addition, BELYAEV received payroll deposits from the Russian government of over \$65,724 from January 2012 to December 2012.

b. In 2010, prior to the time that the Russian government began direct deposits of payroll, BELYAEV maintained a money market/savings account at a particular bank (the "BELYAEV Savings Account"). In 2010, over \$61,000 of cash, interest, and transfers was deposited into the BELYAEV Savings Account.

c. In May 2008, almost a year and a half before BELYAEVA and BELYAEV applied for Medicaid, BELYAEV applied for a credit card from a particular bank (the "BELYAEV Credit Card-1") and represented his income to be \$60,000 a year. At \$60,000 a year, BELYAEV would have averaged a monthly income of \$5,000 a month, about \$2,000 more than BELYAEV and BELYAEVA reported on their Medicaid application in December 2009. In 2010, BELYAEV made and paid for purchases of over \$46,900 using BELYAEV Credit Card-1, including: (i) over \$1,120 at Apple in January 2010, (ii) \$1,000 in Bloomingdale's in September 2010, and (iii) over \$1,600 at Jimmy Choo in October 2010. In 2011, during the time that BELYAEV and BELYAEVA's child received Medicaid benefits, BELYAEV made and paid for almost \$20,000 in purchases on the BELYAEV Credit Card-1.

73. Based on my review of NYDOH Medicaid eligibility materials for the year 2009, I know that DARIA BELYAEVA, the defendant, would not have been eligible for Medicaid benefits, had KONSTANTIN BELYAEV and DARIA BELYAEVA, the defendants, truthfully reported BELYAEV's salary at the Mission.

YURIY SPIRIN and ANNA SPIRINA

74. Based on my review of State Department and immigration records, I know the following:

a. YURIY SPIRIN and ANNA SPIRINA, the defendants, have been married since at least in or about May 2007, the month and year that the State Department issued their diplomatic visas.

b. SPIRIN was employed as an Attaché and a Third Secretary at the Mission and was in the United States pursuant to a diplomatic visa. As SPIRIN's wife, SPIRINA also resided in the United States on a diplomatic visa. SPIRIN and SPIRINA lived in New York City, in housing owned and paid for by the Russian government. SPIRIN and SPIRINA no longer work or reside in the United States.

c. During the time that she resided in the United States, SPIRINA gave birth to two children. The children did not acquire United States citizenship.

75. Based on my review of NYCHRA documents, I know the following:

a. In or about December 2008, ANNA SPIRINA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On the application, SPIRINA represented the information she provided to be true under penalty of perjury. At the time of SPIRINA's application, the Medicaid eligibility income monthly limit was \$2,934 for the household size she reported.

b. In the application, SPIRINA falsely stated that she earned only \$29,000 annually. A \$29,000 annual income is approximately \$2,416 a month.

c. In support of SPIRINA's December 2008 Application, SPIRINA and SPIRIN submitted a letter dated December 1, 2008, signed by CC-1, in which CC-1 falsely reported that SPIRIN and SPIRINA made \$29,000 a year in salary at the Mission.

d. In or about January 2011, ANNA SPIRINA, the defendant, again applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application (the "January 2011 Application"). On the January 2011 Application, SPIRINA represented the information she provided to be true under penalty of perjury. At the time of SPIRINA's January 2011 Application, the Medicaid eligibility income monthly limit was \$3,725 for the household size she reported.

e. In the January 2011 Application, SPIRINA falsely stated that her husband, SPIRIN, the defendant, earned only \$2,500 a month in income.

f. In support of SPIRINA's January 2011 Application, SPIRINA and SPIRIN submitted a letter dated January 13, 2011, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that SPIRIN made \$2,500 a month in income at the Mission as a Third Secretary. Based on my training and experience and my knowledge of the investigation, I know that a Third Secretary is a higher level position than an Attaché, SPIRIN's position in 2008 when SPIRINA and SPIRIN first applied for Medicaid. Although he received a promotion according to the KORNEEV letter and the representations made by SPIRINA in the January 2011 Application, SPIRIN's income only increased approximately \$84 a month.

g. Based on the misrepresentations in the December 2008 and January 2011 Applications, SPIRINA and her children received over \$37,000 from December 2008 to January 2012 in Medicaid benefits that they would not otherwise have been entitled to.

76. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. Beginning in July 2011 and ending in December 2011, during the time that ANNA SPIRINA, the defendant, and her children received Medicaid benefits, YURIY SPIRIN, the defendant, received payroll deposits from the Russian government totaling over \$34,000. SPIRIN's average monthly income during that time was therefore approximately \$4900 a month, over \$2,400 a month more than SPIRIN and SPIRINA reported to Medicaid on their initial application in December 2008 and approximately \$2,400 a month more than they reported to Medicaid on the January 2011 Application. In addition, SPIRIN received payroll

deposits from the Russian government of over \$59,955 from January 2012 to July 2012.

b. In approximately May 2007, approximately a year and a half before the December 2008 Application, YURIY SPIRIN and ANNA SPIRINA, the defendants, applied for a credit card from a particular bank (the "SPIRIN Credit Card-1") and represented their income to be \$100,000 a year. In 2010, during the time that SPIRINA and her first child were obtaining Medicaid benefits, over \$20,300 in purchases were made and paid for on the SPIRIN Credit Card-1. In 2011, during the time that SPIRINA and both of her children were receiving Medicaid benefits, over \$35,700 in purchases were made and paid for on SPIRIN Credit Card-1, including approximately \$3,800 from Apple in July, August, and September 2011.

c. SPIRIN also made and paid for various purchases from Tiffany & Co. during the time that SPIRINA and her children collected Medicaid benefits, including a \$1,600 purchase in July 2009.

77. Based on my review of NYDOH Medicaid eligibility materials for the year 2008 and 2011, I know that ANNA SPIRINA, the defendant, would not have been eligible for Medicaid benefits, had YIRIY SPIRIN and ANNA SPIRINA, the defendants, truthfully reported SPIRIN's salary at the Mission on the December 2008 and January 2011 Applications.

VICTOR VINOGRADOV and ALEXANDRA VINOGRADOVA

78. Based on my review of State Department records, I know the following:

a. VICTOR VINOGRADOV and ALEXANDRA VINOGRADOVA, the defendants, have been married since at least in or about March 2009, the month and year that the State department issued diplomatic visas to them.

b. VINOGRADOV was employed as a Third Secretary at the Mission and was in the United States pursuant to a diplomatic visa. As VINOGRADOV's wife, VINOGRADOVA also resided in the United States on a diplomatic visa. VINOGRADOV and VINOGRADOVA lived in the Bronx, New York, in housing owned and paid for by the Russian government. VINOGRADOV and VINOGRADOVA no longer work or reside in the United States.

c. During the time that she resided in the United States, VINOGRADOVA gave birth to a child. The child did not acquire United States citizenship.

79. Based on my review of NYCHRA documents, I know the following:

a. In or about March 2010, ALEXANDRA VINOGRADOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, VINOGRADOVA represented the information she provided to be true under penalty of perjury. At the time of VINOGRADOVA's application, the Medicaid eligibility income monthly limit was \$3,052 for the household size that she reported.

b. In the application, VINOGRADOVA falsely stated that her husband, VICTOR VINOGRADOV, the defendant, earned only \$3,000 a month.

c. In support of VINOGRADOVA's application, VINOGRADOVA and VINOGRADOV submitted a letter dated January 26, 2010, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that VINOGRADOV made \$3,000 a month in income at the Mission as a Third Secretary.

d. In or about October 2010, VINOGRADOVA completed a Medicaid renewal application in which she reiterated that VINOGRADOV received income of \$3,000 a month. A second letter signed by KORNEEV and dated March 16, 2011, again falsely reported that VINOGRADOV's income was only \$3,000 a month as a Third Secretary.

e. Based on the misrepresentations in the initial and renewal applications, VINOGRADOVA and her child received over \$21,000 from March 2010 to January 2012 in Medicaid benefits that they would not otherwise have been entitled to.

80. Based on my review of bank records, credit card records, and other documents, I know that in approximately March or April 2009, VICTOR VINOGRADOV, the defendant, applied for a credit card from a particular bank (the "VINOGRADOV Credit Card-1") and represented his income to be \$50,000 a year. At \$50,000 a year, VINOGRADOV would have averaged a monthly salary of \$4,166, about \$1,100 a month more than VINOGRADOV and VINOGRADOVA reported on their Medicaid application in March

2010. In 2010, VINOGRADOV made and paid for approximately \$39,350 in purchases using VINOGRADOV Credit Card-1.

81. Based on my review of NYDOH Medicaid eligibility materials for the year 2010, I know that ALEXANDRA VINOGRADOVA, the defendant, would not have been eligible for Medicaid benefits, had VICTOR VINOGRADOV and VINOGRADOVA, the defendants, truthfully reported VINOGRADOV's salary at the Mission.

DANIIL MOKIN and ANNA MOKINA

82. Based on my review of State Department and NYCHRA records, I know the following:

a. DANIIL MOKIN and ANNA MOKINA, the defendants, have been married since at least August 2006, when the State Department issued diplomatic visas to them.

b. MOKIN was employed as a Counselor and First Secretary at the Mission and resided in the United States on a diplomatic visa. As MOKIN's wife, MOKINA also resided in the United States on a diplomatic visa. MOKIN and MOKINA lived in the Bronx, New York, in housing owned by and paid for by the Russian government. MOKIN and MOKINA no longer live or work in the United States.

c. During the time that she resided in the United States, MOKINA received medical care for a pregnancy.

83. Based on my review of NYCHRA documents, I know the following:

a. On or about March 18, 2011, ANNA MOKINA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, MOKINA represented the information she provided to be true under penalty of perjury. At the time of MOKINA's application, the Medicaid eligibility income monthly limit was \$3,725 for a household of the size that she reported.

b. In the application, ANNA MOKINA falsely stated that her husband, DANIIL MOKIN, the defendant, earned only \$3,000 a month. MOKINA also did not list her own income from the Mission. MOKINA also applied for WIC benefits.

c. In support of MOKINA's application, MOKIN and MOKINA submitted a letter dated March 21, 2011, signed by

MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that MOKIN made \$3,000 a month in salary at the Mission.

d. Based on the misrepresentations in MOKINA's application, MOKINA received more than \$1,800 from March 2011 to January 2012 in Medicaid benefits that she would not otherwise have been entitled to.

84. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. Beginning in June 2011, and ending in April 2012, which includes the time during which ANNA MOKINA, the defendant, received Medicaid benefits, DANIIL MOKIN, the defendant, received payroll deposits from the Russian government totaling over \$64,000. MOKIN's monthly salary from the Mission in 2011 was approximately \$6,123 a month.

b. Beginning in June 2011, and ending in June 2012, which includes the time during which MOKINA received Medicaid benefits, MOKINA received payroll deposits from the Russian government totaling over \$33,370. MOKINA's monthly salary from the Mission in 2011 was approximately \$2,789 a month. Together, MOKIN and MOKINA collected approximately \$8,912 a month in salary from the Mission, or approximately \$106,944 a year. This is approximately \$5,912 more a month than the salary reported by MOKIN and MOKINA to Medicaid.

c. In or about January 2007, MOKIN applied for a credit card ("MOKIN Credit Card-1") from a particular bank and represented his annual household income to be \$65,000 per year (approximately \$5,416 a month). MOKIN listed his employer as the Mission and his position as First Secretary. In 2011, MOKIN and MOKINA made and paid for over \$21,250 in purchases on MOKIN Credit Card-1. In February 2011, shortly before applying for Medicaid benefits, MOKIN and MOKINA spent approximately \$3,650 at a fur coat store, which is more than MOKIN and MOKINA represented to earn per month on the Medicaid application they completed in March 2011.

d. In or about May 2009 and January 2011, MOKIN applied for two other credit cards ("MOKIN Credit Card-2" and "MOKIN Credit Card-3") from the same bank. In the May 2009 application for MOKIN Credit Card-2, MOKIN represented his annual household income to be \$60,000 (or \$5,000 a month). In

the January 2011 application for MOKIN Credit Card-3, which was submitted a few months prior to the MOKINA application for Medicaid benefits, MOKIN represented his monthly income to be \$6,250 (or \$75,000 per year).

85. Based on my review of NYDOH Medicaid eligibility materials for the year 2011, I know that ANNA MOKINA, the defendant, would not have been eligible for Medicaid benefits, had MOKINA and DANIEL MOKIN, the defendants, truthfully reported MOKIN'S salary at the Mission.

ALEXANDER BEYKUN and ELENA BEYKUN

86. Based on my review of State Department and NYCHRA records, I know the following:

a. ALEXANDER BEYKUN and ELENA BEYKUN, the defendants, have been married since at least December 2008, the month and year that the State Department issued diplomatic visas to them.

b. ALEXANDER BEYKUN was employed as a Staff Member in the Mission and resided in the United States pursuant to a diplomatic visa. As ALEXANDER BEYKUN'S wife, ELENA BEYKUN also resided in the United States on a diplomatic visa. ALEXANDER BEYKUN and ELENA BEYKUN lived in the Bronx, New York, in housing owned and paid for by the Russian government. ALEXANDER BEYKUN and ELENA BEYKUN no longer live or work in the United States.

c. During the time that she resided in the United States, ELENA BEYKUN gave birth to a child. The child did acquire United States citizenship.

87. Based on my review of NYCHRA documents, I know the following:

a. On or about August 5, 2010, ELENA BEYKUN, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, ELENA BEYKUN represented the information she provided to be true under penalty of perjury. At the time of ELENA BEYKUN'S application, the Medicaid eligibility income monthly limit was \$3,675 for the household size she reported.

b. In the application, ELENA BEYKUN falsely stated that her husband, ALEXANDER BEYKUN, the defendant, earned only \$2,900 a month in income. In her application, ELENA BEYKUN also applied for WIC benefits.

c. In support of the application, ELENA BEYKUN and ALEXANDER BEYKUN submitted a letter dated August 5, 2010, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that ALEXANDER BEYKUN made \$2,900 a month in salary at the Mission.

d. Based on the misrepresentations in ELENA BEYKUN's application, ELENA BEYKUN and her child received approximately \$20,100 from August 2010 to January 2012 in Medicaid benefits that they would not otherwise have been entitled to.

88. Based on my review of bank records, credit card records, and other documents, I know the following:

a. Beginning in June 2011 and ending in December 2011, during the time that his family continued to receive Medicaid benefits, ALEXANDER BEYKUN, the defendant, received payroll deposits from the Russian government totaling approximately \$25,602. ALEXANDER BEYKUN's monthly salary during that time was therefore approximately \$3,657 a month, over \$750 more than was reported to Medicaid on the application in August 2010.

b. Prior to and during the period when ALEXANDER BEYKUN's family received Medicaid benefits, ALEXANDER BEYKUN maintained a bank account at a particular bank. In 2010, the year in which ALEXANDER BEYKUN's family began receiving Medicaid benefits, approximately \$60,376 of cash, interest, and transfers, was deposited into the account.

89. Based on my review of NYDOH Medicaid eligibility materials for the year 2010, I know that ELENA BEYKUN, the defendant, would not have been eligible for Medicaid benefits, had ALEXANDER BEYKUN and ELENA BEYKUN, the defendants, truthfully reported ALEXANDER BEYKUN's salary at the Mission.

SERGEY SHCHERBAKOV and OLESYA NOVIKOVA

90. Based on my review of State Department records, I know the following:

a. SERGEY SHCHERBAKOV and OLESYA NOVIKOVA, the defendants, have been married since at least in or about August 2007, the month and year that the State Department issued diplomatic visas to them.

b. SHCHERBAKOV was employed as a Third Secretary at the Mission and was in the United States pursuant to a diplomatic visa. As SHCHERBAKOV's wife, NOVIKOVA also resided in the United States on a diplomatic visa. SHCHERBAKOV and NOVIKOVA lived in the Bronx, New York, in housing owned and paid for by the Russian government. SHCHERBAKOV and NOVIKOVA no longer live or work in the United States.

c. During the time that she resided in the United States, NOVIKOVA gave birth to two children. The children did not acquire United States citizenship.

91. Based on my review of NYCHRA documents, I know the following:

a. In or about October 31, 2007, OLESYA NOVIKOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On the application, NOVIKOVA represented the information she provided to be true under penalty of perjury. At the time of NOVIKOVA's application, the Medicaid eligibility income monthly limit was \$2,862 for the household size she reported.

b. In the application, NOVIKOVA falsely stated that her husband, SERGEY SHCHERBAKOV, the defendant, earned only \$2,800 a month in income.

c. In support of NOVIKOVA's application, NOVIKOVA and SHCHERBAKOV submitted a letter dated October 29, 2007, signed by CC-1, in which CC-1 falsely reported that SHCHERBAKOV made \$2,800 a year in salary at the Mission.

d. In or about November 2009, OLESYA NOVIKOVA, the defendant, again applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application (the "November 2009 Application"). On the November 2009 Application, OLESYA represented the information she provided to be true under penalty of perjury. At the time of NOVIKOVA's November 2009 Application, the Medicaid eligibility income monthly limit was \$3,675 for the household size she reported.

e. In the November 2009 Application, NOVIKOVA falsely stated that her husband, SERGEY SHCHERBAKOV, the defendant, earned only \$3,000 a month.

f. In support of NOVIKOVA's November 2009 Application, SHCHERBAKOV and NOVIKOVA submitted a letter dated November 16,

2009, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that SHCHERBAKOV made \$3,000 a month in salary at the Mission as a Third Secretary.

g. Based on the misrepresentations in the October 2007 and November 2009 Applications, NOVIKOVA and her children received over \$42,800 from October 2007 to November 2011 in Medicaid benefits that they would not otherwise have been entitled to.

92. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. In or about October 2007, at about the same time that OLESYA NOVIKOVA, the defendant, applied for Medicaid benefits for her first pregnancy, SERGEY SHCHERBAKOV, the defendant, applied for a credit card from a particular bank (the "SHCHERBAKOV Credit Card-1") and represented his salary to be \$80,000 a year. A salary of \$80,000 a year results in a monthly salary of approximately \$6,666, which is approximately \$3,800 a month more than the salary of \$2,800 a month that SHCHERBAKOV and NOVIKOVA represented on the October 2007 Application. In 2008, SHCHERBAKOV and NOVIKOVA purchased and paid for approximately \$26,700 of goods and services using the SHCHERBAKOV Credit Card-1, including: (i) over approximately \$2,500 at bicycle stores, and (ii) approximately \$1,200 at Burberry, among others. In 2009, SHCHERBAKOV and NOVIKOVA made and paid for approximately \$30,700 in purchases on the SHCHERBAKOV Credit Card-1.

b. Beginning in June 2011 and ending in November 2011, during the time that OLESYA NOVIKOV, the defendant, and her children received Medicaid benefits, SERGEY SHCHERBAKOV the defendant, received payroll deposits from the Russian government totaling over \$46,632 for that approximately six month period, including a large deposit in November 2011.

c. In August 2009, during the time that NOVIKOVA and her first child were collecting Medicaid benefits, NOVIKOVA made a purchase from Tiffany & Co. for approximately \$1,340.

93. Based on my review of NYDOH Medicaid eligibility materials for the year 2007 and 2009, I know that OLESYA NOVIKOVA, the defendant, would not have been eligible for Medicaid benefits, had SERGEY SHCHERBAKOV and OLESYA NOVIKOVA,

the defendants, truthfully reported SHCHERBAKOV's salary at the Mission.

DENIS ARINUSHKIN and EVGENIA ARINUSHKINA

94. Based on my review of State Department records, I know the following:

a. DENIS ARINUSHKIN and EVGENIA ARINUSHKINA, the defendants, have been married since at least in or about January 2007, the month and year that the State Department issued diplomatic visas for them.

b. ARINUSHKIN was employed as a Third Secretary at the Mission and was in the United States pursuant to a diplomatic visa. As ARINUSHKIN's wife, ARINUSHKINA also resided in the United States on a diplomatic visa. ARINUSHKIN and ARINUSHKINA lived in the Bronx, New York, in housing owned and paid for by the Russian government. ARINUSHKIN and ARINUSHKINA no longer work or reside in the United States.

c. During the time that she resided in the United States, ARINUSHKINA gave birth to a child. The child did not acquire United States citizenship.

95. Based on my review of NYCHRA documents, I know the following:

a. In or about May 2008, EVGENIA ARINUSHKINA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On the application, ARINUSHKINA represented the information she provided to be true under penalty of perjury. At the time of ARINUSHKINA's application, the Medicaid eligibility income monthly limit was \$3,534 for their reported household size. ARINUSHKINA also applied for WIC benefits.

b. In the application, ARINUSHKINA falsely stated that her husband, DENIS ARINUSHKIN, the defendant, earned only \$3,000 a month in income.

c. In support of ARINUSHKINA's application, ARINUSHKINA and ARINUSHKIN submitted a letter dated April 30, 2008, signed by CC-1, in which CC-1 falsely reported that ARINUSHKIN made \$3,000 a month in income at the Mission as a Third Secretary.

d. Based on the misrepresentations in the application, ARINUSHKINA and her child received almost \$24,000 from May 2008 to March 2011 in Medicaid benefits that they would not otherwise have been entitled to.

96. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. In or about 2008, over \$44,000 of cash, interest, and transfers were deposited into a particular bank account in the name of DENIS ARINUSHKIN, the defendant (the "ARINUSHKIN Account"). In 2009, over \$51,000 of cash, interest, and transfers were deposited into the ARINUSHKIN Account.

b. In or about March or April 2007, prior to the time that ARINUSHKINA applied for Medicaid benefits, ARINUSHKIN applied for a credit card from a particular bank ("ARINUSHKIN Credit Card-1") and represented his salary to be \$50,000 a year as a Third Secretary. A salary of \$50,000 a year results in a monthly salary of approximately \$4,166, which is over \$1,100 a month more than EVGENIA ARINUSHKINA, the defendant, and ARINUSHKIN reported on the Medicaid application. In 2007, ARINUSHKIN and ARINUSHKINA made and paid for over approximately \$20,800 in purchases on ARINUSHKIN Credit Card-1. In 2008, ARINUSHKIN and ARINUSHKINA made and paid for over approximately \$43,900 in purchases on ARINUSHKIN Credit Card-1, including purchases at Giorgio Armani and a purchase of Madonna concert tickets.

97. Based on my review of NYDOH Medicaid eligibility materials for the year 2008, I know that EVGENIA ARINUSHKINA, the defendant, would not have been eligible for Medicaid benefits, had DENIS ARINUSHKIN and ARINUSHKINA, the defendants, truthfully reported ARINUSHKIN's salary at the Mission.

ANDREY SHAMIN and EKATERINA SHAMINA

98. Based on my review of State Department records, I know the following:

a. ANDREY SHAMIN and EKATERINA SHAMINA, the defendants, have been married since at least in or about February 2009, the month and year that SHAMIN's diplomatic visa was issued by the State Department.

b. SHAMIN was employed as a Staff Member at the Mission and was in the United States pursuant to a diplomatic visa. As SHAMIN's wife, SHAMINA also resided in the United States on a diplomatic visa. SHAMIN and SHAMINA lived in the Bronx, New York, in housing owned and paid for by the Russian government. SHAMIN and SHAMINA no longer work or reside in the United States.

c. During the time that she resided in the United States, SHAMINA gave birth to a child. The child did acquire United States citizenship.

99. Based on my review of NYCHRA documents, I know the following:

a. In or about November 2010, EKATERINA SHAMINA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On the application, SHAMINA represented the information she provided to be true under penalty of perjury. At the time of SHAMINA's application, the Medicaid eligibility income monthly limit was \$3,675 for the household size she reported.

b. In the application, SHAMINA falsely stated that her husband, ANDREY SHAMIN, the defendant, earned only \$2,900 a month.

c. In support of SHAMINA's application, SHAMINA and SHAMIN submitted a letter dated November 2, 2010, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that SHAMIN made \$2,900 a month in salary at the Mission.

d. Based on the misrepresentations in the application, SHAMINA and her child received over \$21,500 from November 2010 to July 2012 in Medicaid benefits that they would not otherwise have been entitled to.

100. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. Beginning in June 2011 and ending in December 2011, during the time that EKATERINA SHAMINA, the defendant, and her child received Medicaid benefits, ANDREY SHAMIN, the defendant, received payroll deposits from the Russian government totaling over \$33,000. SHAMIN's monthly salary therefore would be

approximately \$4,717 a month, which is approximately \$1,800 a month more than SHAMIN and SHAMINA reported to Medicaid in November 2010. In addition, SHAMIN received payroll deposits of over \$56,600 from January 2012 to December 2012, during the time that SHAMINA and her child received Medicaid benefits.

b. In or about November 2010, around the same time that SHAMINA applied for Medicaid, SHAMIN applied for a credit card from a particular bank and reported his income to be \$60,000.

c. In 2010, SHAMIN and SHAMINA made and paid for approximately \$22,700 in purchases on a particular credit card ("SHAMIN Credit Card-1"). These purchases included: (i) over \$3,100 from a camera store, and (ii) over \$1,700 from J&R Music World.

101. Based on my review of NYDOH Medicaid eligibility materials for the year 2010, I know that EKATERINA SHAMINA, the defendant, would not have been eligible for Medicaid benefits, had ANDREY SHAMIN and EKATERINA SHAMINA, the defendants, truthfully reported SHAMIN's salary at the Mission.

ANDREY KALININ and IRINA SHIRSHOVA

102. Based on my review of State Department records, I know the following:

a. ANDREY KALININ and IRINA SHIRSHOVA, the defendants, have been married since at least December 2008, the month and year that SHIRSHOVA was issued a diplomatic visa.

b. KALININ was employed most recently as a First Secretary at the Mission and resided in the United States on a diplomatic visa. As KALININ's wife, SHIRSHOVA also resided in the United States on a diplomatic visa. While residing in the United States pursuant to diplomatic visas, KALININ and SHIRSHOVA lived in the Bronx, New York, in housing owned by and paid for by the Russian government. KALININ and SHIRSHOVA no longer work or reside in the United States.

c. During the time that she resided in the United States, SHIRSHOVA gave birth to two children. Neither child acquired United States citizenship at birth.

103. Based on my review of NYCHRA documents, I know the following:

a. On or about March 9, 2009, IRINA SHIRSHOVA, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On her application, SHIRSHOVA represented the information she provided to be true under penalty of perjury. At the time of SHIRSHOVA's application, the Medicaid eligibility income monthly limit was \$3,675 for a household of the size that she reported.

b. In the application, SHIRSHOVA falsely stated that her husband, ANDREY KALININ, the defendant, earned only \$2,900 a month in income. In her application, SHIRSHOVA also applied for WIC benefits.

c. In support of SHIRSHOVA's application, KALININ and SHIRSHOVA submitted a letter dated March 9, 2009, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that KALININ, a Second Secretary at the Mission, made \$2,900 a month in income at the Mission.

d. On or about November 25, 2009, KALININ and SHIRSHOVA submitted a Medicaid renewal application via the mail. At the time of the renewal application, the Medicaid eligibility income monthly limit was \$3,675 for a household of the size that KALININ and SHIRSHOVA reported.

e. In the renewal application, SHIRSHOVA and KALININ falsely claimed that KALININ made \$3,000 a month in income at the Mission.

f. In support of the November 25, 2009 renewal application, KALININ and SHIRSHOVA submitted a letter dated November 11, 2009, signed by MIKHAIL KORNEEV, the defendant, in which KORNEEV falsely reported that KALININ, a Second Secretary at the Mission, made \$3,000 a month in salary at the Mission.

g. On or about November 19, 2010, KALININ and SHIRSHOVA submitted another Medicaid renewal application via the mail. At the time of the November 19, 2010 renewal application, the Medicaid eligibility income monthly limit was \$3,675 for a household of the size that KALININ and SHIRSHOVA reported.

h. In the November 19, 2010 renewal application, SHIRSHOVA and KALININ falsely claimed that KALININ made \$3,900 a month in income at the Mission.

i. In support of the November 19, 2010 renewal application, KALININ and SHIRSHOVA submitted a letter dated November 11, 2010, signed by KORNEEV, in which KORNEEV falsely reported that KALININ, a First Secretary at the Mission, made \$3,900 a month in salary at the Mission. KALININ and SHIRSHOVA also reported \$225 in monthly housing payments (which, when subtracted from \$3,900, totaled \$3,675, at the eligibility cutoff described in paragraph g, above).⁴

j. On or about September 8, 2011, SHIRSHOVA, completed another initial "Access NY Healthcare" application for pregnancy benefits (the "September 2011 SHIRSHOVA Application"). On her application, SHIRSHOVA represented the information she provided to be true under penalty of perjury. At the time of SHIRSHOVA's application, the Medicaid eligibility income monthly limit was \$4,362 for a household of the size that she reported.

k. In the September 2011 SHIRSHOVA Application, SHIRSHOVA falsely stated that her husband, KALININ, the defendant, earned \$5,700 a month in income. SHIRSHOVA also reported \$900 in monthly housing payments and \$800 in childcare expenses (which, when subtracted from \$5,700, totaled \$4,000, below the eligibility cutoff described in paragraph j, above). In her application, SHIRSHOVA also applied for WIC benefits.

l. In support of the September 2011 SHIRSHOVA Application, KALININ and SHIRSHOVA submitted a letter dated September 12, 2011, signed by KORNEEV, in which KORNEEV falsely reported that KALININ, an employee at the Mission, made \$5,700 a month in salary at the Mission. KORNEEV also stated in the letter that KALININ's family is charged \$900 a month for rent and utility services at the Mission's premises, and that the family is charged \$800 a month in child nursery expenses.

m. Based on the misrepresentations in the applications described above, SHIRSHOVA and her children received more than \$23,200 from March 2009 to January 2012 in Medicaid benefits that they would not otherwise have been entitled to.

104. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

⁴ On a January 2013 credit card application, KALININ reported that rent payments were "not applicable" to him, reflecting the fact that KALININ and SHIRSHOVA do not pay rent.

a. Beginning in June 2011 and ending in December 2011, during the time that his family continued to receive Medicaid benefits, ANDREY KALININ, the defendant, received payroll deposits from the Russian government totaling over \$40,701. KALININ's monthly salary during that time was therefore approximately \$5,810 a month, over \$2,900 a month more than KALININ and IRINA SHIRSHOVA, the defendant, reported to Medicaid on their initial application, over \$1,900 a month more than KALININ and SHIRSHOVA reported on their renewal application only seven months earlier, and over one hundred dollars a month more than the \$5,700 reported in the September 2011 SHIRSHOVA Application. From approximately January 2012 to June 2013, KALININ received payroll deposits from the Russian government totaling over \$141,000.

b. In or about May and August 2008, prior to the date on the initial March 2009 SHIRSHOVA Application was submitted, KALININ applied for a credit card ("KALININ Credit Card-1") from a particular financial institution and represented that he was employed as a Second Secretary to the Mission and that his yearly salary was \$50,000, or more than \$4,166 a month. In 2008, KALININ and SHIRSHOVA made and paid for purchases totaling over \$13,800 on KALININ Credit Card-1. In 2009, the year in which KALININ and SHIRSHOVA initially applied for Medicaid benefits, KALININ and SHIRSHOVA made and paid for over \$31,800 of purchases on KALININ Credit Card-1.

c. On or about January 2013, KALININ applied for another credit card ("KALININ Credit Card-2") from a different bank and represented that he was employed as a staff member at the Mission. In this application, KALININ represented that his total annual income was \$75,000 a year, or \$6,250 a month.

105. Based on my review of NYDOH Medicaid eligibility materials for the years 2009, 2010, and 2011, I know that IRINA SHIRSHOVA, the defendant, would not have been eligible for Medicaid benefits, had ANDREY KALININ and SHIRSHOVA, the defendants, truthfully reported KALININ's salary at the Mission.

OLEG KRAVCHENKO and OLESYA KRAVCHENKO

106. Based on my review of State Department records, I know the following:

a. OLEG KRAVCHENKO and OLESYA KRAVCHENKO, the defendants, have been married since at least in or about April

2007, the month and year that the State Department issued diplomatic visas to them.

b. OLEG KRAVCHENKO was employed as a Counselor at the Mission and was in the United States pursuant to a diplomatic visa. As OLEG KRAVCHENKO's wife, OLESYA also resided in the United States on a diplomatic visa. OLEG KRAVCHENKO and OLESYA KRAVCHENKO lived in the Bronx, New York, in housing owned and paid for by the Russian government. OLEG KRAVCHENKO and OLESYA KRAVCHENKO no longer work or reside in the United States.

c. During the time that she resided in the United States, OLESYA KRAVCHENKO gave birth to a child. The child did not acquire United States citizenship.

107. Based on my review of NYCHRA documents, I know the following:

a. In or about April 2008, OLESYA KRAVCHENKO, the defendant, applied for pregnancy Medicaid benefits at the Hospital by completing an "Access NY Healthcare" application. On the application, OLESYA KRAVCHENKO represented the information she provided to be true under penalty of perjury. At the time of OLESYA KRAVCHENKO's application, the Medicaid eligibility income monthly limit was \$2,934 for the household size she reported.

b. In the application, OLESYA KRAVCHENKO falsely stated that her husband, OLEG KRAVCHENKO, the defendant, earned only \$2,900 a month in income.

c. In support of OLESYA KRAVCHENKO's application, OLEG KRAVCHENKO and OLESYA KRAVCHENKO submitted a letter dated April 4, 2008, signed by CC-1, in which CC-1 falsely reported that OLEG KRAVCHENKO made \$2,900 a year in salary at the Mission.

d. Based on the misrepresentations in the application, OLESYA KRAVCHENKO and her child received over \$23,200 from April 2008 to January 2010 in Medicaid benefits that they would not otherwise have been entitled to.

108. Based on my review of bank records, credit card records, store receipts, and other documents, I know the following:

a. In or about May 2007, about one year before OLESYA KRAVCHENKO, the defendant, applied for Medicaid benefits, OLEG

KRAVCHENKO, the defendant, applied for a credit card from a particular bank ("KRAVCHENKO Credit Card-1") and represented his salary to be \$60,000. A salary of \$60,000 a year would average out to \$5,000 a month, which is \$2,100 a month more than OLESYA KRAVCHENKO and OLEG KRAVCHENKO represented OLEG KRAVCHENKO's salary to be in OLESYA KRAVCHENKO's April 2008 Medicaid application. In 2008, the year that OLESYA KRAVCHENKO applied for Medicaid benefits, OLEG and OLESYA KRAVCHENKO made and paid for approximately \$12,700 in purchases on KRAVCHENKO Credit Card-1.

b. In 2008, prior to the time that the Russian government began direct deposits of payroll, OLEG KRAVCHENKO and OLESYA KRAVCHENKO maintained checking and savings accounts at a particular bank (the "KRAVCHENKO Accounts"). In 2008, almost \$51,000 of cash, transfers, and interest was deposited into the KRAVCHENKO Accounts.

109. Based on my review of NYDOH Medicaid eligibility materials for the year 2008, I know that OLESYA KRAVCHENKO, the defendant, would not have been eligible for Medicaid benefits, had OLEG KRAVCHENKO and OLESYA KRAVCHENKO, the defendants, truthfully reported OLEG KRAVCHENKO's salary at the Mission.

VITALY KONDRATENKO and NATALIYA KONDRATENKO

110. Based on my review of State Department and NYCHRA records, I know the following:

a. VITALY KONDRATENKO and NATALIYA KONDRATENKO, the defendants, have been married since at least in or about October 2002, the month and year that the State Department issued diplomatic visas for them.

b. VITALY KONDRATENKO was employed at the Trade Representation and Consulate and resided in the United States pursuant to a diplomatic visa. As VITALY KONDRATENKO's wife, NATALIYA KONDRATENKO also resided in the United States on a diplomatic visa. VITALY KONDRATENKO and NATALIYA KONDRATENKO no longer work or reside in the United States.

c. During the time that she resided in the United States, NATALIYA KONDRATENKO gave birth to a child (the "KONDRATENKO Child"). The KONDRATENKO Child did not acquire United States citizenship at birth. In or about May 2006, the State Department notified VITALY and NATALIYA KONDRATENKO that their child did not acquire United States citizenship. In or

about June 2006, the State Department issued a diplomatic visa for the KONDRATENKO Child, allowing the KONDRATENKO Child, a Russian citizen, to remain in the United States.

111. Based on my review of NYCHRA documents, I know the following:

a. In or about July 2006, VITALY and NATALIYA KONDRATENKO, the defendants, completed a Medicaid application for the KONDRATENKO Child. In the application, VITALY and NATALIYA KONDRATENKO represented the information they provided to be true under penalty of perjury. In the application, VITALY and NATALIYA KONDRATENKO falsely represented the KONDRATENKO Child to be a United States citizen and a United States social security card was provided for the KONDRATENKO Child.

b. On or about May 3, 2007, VITALY and NATALIYA KONDRATENKO, the defendants, completed a renewal of Medicaid benefits application (the "May 2007 Application"). In the May 2007 Application, VITALY and NATALIYA KONDRATENKO falsely stated that the KONDRATENKO Child was a United States citizen.

c. Following the date of the July 2006 application, the KONDRATENKO Child received approximately \$7,650 in Medicaid benefits.

112. Based on my discussions with an employee of the NYDOH, I know that the KONDRATENKO Child would not have been eligible for Medicaid benefits, had VITALY KONDRATENKO and NATALIYA KONDRATENKO, the defendants, truthfully reported that the KONDRATENKO Child was not a United States citizen.

ALEXEY SKORODUMOV

113. Based on my review of State Department records, I know the following:

a. ALEXEY SKORODUMOV, the defendant, has been married to a co-conspirator not named as a defendant herein ("CC-6") since at least in or about October 2002, the month and year that the State Department issued diplomatic visas to them.

b. SKORODUMOV was employed as an Attaché at the Mission and was in the United States pursuant to a diplomatic visa. As SKORODUMOV's wife, CC-6 also resided in the United States on a diplomatic visa. SKORODUMOV and CC-6 lived in the

Bronx, New York, in housing owned and paid for by the Russian government. SKORODUMOV and CC-6 no longer work or reside in the United States.

c. During the time that she resided in the United States, CC-6 gave birth to a child. The child did not acquire United States citizenship (the "SKORODUMOV Child"). In or about December 2004, the State Department issued a diplomatic visa for the SKORODUMOV child, allowing the SKORODUMOV Child, a Russian citizen, to remain in the United States.

114. Based on my review of NYCHRA documents, I know the following:

a. In or about February 2005, approximately three months after the State Department issued a United States visa for the SKORODUMOV Child, ALEXEY SKORODUMOV, the defendant, completed an application for benefits at the Hospital's pediatric department. On the application, SKORODUMOV represented the information he provided to be true under penalty of perjury.

b. In the application, SKORODUMOV falsely stated that the SKORODUMOV Child was a United States citizen and provided a copy of the SKORODUMOV Child's United States social security card and a United States birth certificate for the SKORODUMOV Child issued by the New York City Department of Mental Health and Hygiene.

c. From the date of the renewal application, the SKORODUMOV Child received over approximately \$1,300 in Medicaid benefits.

115. Based on my discussions with an employee of the NYDOH, I know that the SKORODUMOV Child would not have been eligible for Medicaid benefits, had ALEXEY SKORODUMOV, the defendant, truthfully reported that the SKORODUMOV Child was not a United States citizen.

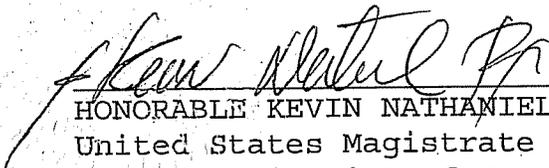
* * * *

WHEREFORE, deponent prays that arrest warrants be issued for MIKHAIL KULESHOV, ANNA KULESHOVA, TIMUR SALOMATIN, NAILYA BABAEVA, MIKHAIL KORNEEV, NATALIYA KORNEEVA, ANDREY ARTASOV, NATALIYA ARTASOVA, SERGEY OGURTSOV, TATIANA OGURTSOVA, ALEXEY KOKHANOV, OLGA KOKHANOVA, ANDREY BOBYLEV, EKATERINA BOBYLEVA, VITALY SAGURA, YAROSLAVA LAZAREVA, ROMAN LYUBUSHKIN, ELENA LYUBUSHKINA, ANDREY SOKOLOV, MARINA BARYSHNIKOVA, KONSTANTIN

BELYAEV, DARIA BELYAEVA, VYACHESLAV SERGEEV, OLGA TRUBNIKOVA, YURIY SPIRIN, ANNA SPIRINA, VICTOR VINOGRADOV, ALEXANDRA VINOGRADOVA, DANIIL MOKIN, ANNA MOKINA, ALEXANDER BEYKUN, ELENA BEYKUN, SERGEY SHCHERBAKOV, OLESYA NOVIKOVA, ANDREY DEMIN, ALLA DEMINA, DENIS ARINUSHKIN, EVGENIA ARINUSHKINA, ANDREY SHAMIN, EKATERINA SHAMINA, ANDREY KALININ, IRINA SHIRSHOVA, OLEG KRAVCHENKO, OLESYA KRAVCHENKO, VITALY KONDRATENKO, NATALIYA KONDRATENKO, ANDREY SAVUSHKIN, EKATERINA SAVUSHKINA, and ALEXEY SKORODUMOV, the defendants, and that he or she be arrested and imprisoned, or bailed, as the case may be.


Jeremy Robertson
Special Agent
Federal Bureau of Investigation

Sworn to before me this
___ day of November, 2013:


HONORABLE KEVIN NATHANIEL FOX
United States Magistrate Judge
Southern District of New York

NOV 18 2013