

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF: LYCOMING



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 29-3-04
MDJ: Hon. William C. Solomon
Address: 2107 Lycoming Creek Road
Williamsport, PA 17701
Telephone: (570) 323-9982

DEFENDANT:

(NAME and ADDRESS):

MICHAEL E. MILLER
First Name Middle Name Last Name Gen.

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States ☐ Distance: _____
☐ 2-Felony Ltd. ☐ 6-Felony Pend. Extradition Determ. ☐ D-Misdemeanor No Extradition
☒ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending
☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number OK. 135-25	Date Filed 6/24/2025	OTN/LiveScan Number K 1012857-6	Complaint Number	Incident Number MFI240355143F	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB [REDACTED]	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name Gen.	
AKA					
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input checked="" type="checkbox"/> Unknown					
HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
EYE COLOR <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				FL. HEIGHT in.	
Fingerprint Classification:				6 0	

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	/	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color			

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG CHRISTOPHER SHERWOOD

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

6/24/2025
(Date)

I, SSA JENNIFER E. SNERR (Name of the Affiant)	[REDACTED] (PSP/MPD/ETC -Assigned Affiant ID Number & Badge #)
of PA OFFICE OF ATTORNEY GENERAL (Identify Department or Agency Represented and Political Subdivision)	[REDACTED] (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above <input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [REDACTED] (Subdivision Code) (Place/Political Subdivision)	
in [REDACTED] County	[41] on or about 7/12/23 THROUGH 2/16/24 (County Code) (Offense Date)

**POLICE CRIMINAL COMPLAINT**

Docket Number: CR-135-25	Date Filed: 6/14/2025	OTN/LiveScan Number	Complaint Number	Incident Number MF1240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated; if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	1407	(a)(1)	of the	Title 62	1	F3	2699	110
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Medicaid Fraud - Submission of False Information

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant did knowingly or intentionally cause false or fraudulent claims to be submitted for furnishing services under the Medical Assistance Program and/or did knowingly submit or caused the submission of false information for the purpose of receiving greater compensation than he was entitled to receive.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	1407	(a)(4)	of the	Title 62	1	F3	2699	110
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Medicaid Fraud - Services Not Rendered

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant did knowingly or intentionally submit claims or cause the submission, of claims for services, supplies or equipment which were not rendered to a recipient.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	1407	(a)(6)	of the	Title 62	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Medicaid Fraud - Below Accepted Medical Treatment Standards

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant did knowingly or intentionally submit claims or cause the submission of claims for services which were not documented in the record in the prescribed manner and are of little or no benefit to the recipient, are below the accepted medical treatment standards, or are unneeded by the recipient.

**POLICE CRIMINAL COMPLAINT**

Docket Number: CR-135-25	Date Filed: 6/24/2025	OTN/LiveScan Number	Complaint Number	Incident Number MF1240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	1407	(a)(7)	of the	Title 62	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance):

Medicaid Fraud - Misrepresentation

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant did knowingly or intentionally submit claims, or cause the submission of claims which misrepresented the description of services, supplies or equipment dispensed or provided; the dates of services; the identity of the recipient; the identity of the attending, prescribing or referring practitioner; or the identity of the actual provider.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	3922	(a)(1)	of the	Title 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance):

Theft by Deception

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant, did intentionally obtain or withhold property of another by creating or reinforcing a false impression, including false impressions as to law, value, intention or other state of mind causing a theft of greater than \$2,000.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	3133	(a)(1)	of the	Title 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance):

Sexual Extortion

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant did knowingly or intentionally coerce a complainant to engage in sexual conduct, by harming or threatening to harm the complainant or the property of the complainant, the reputation of the complainant or any other thing of value of the complainant while acting in a position of trust.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-135-25	Date Filed: 6/24/2025	OTN/LiveScan Number	Complaint Number	Incident Number MF1240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the *specific section(s) and subsection(s) of the statute(s) or ordinance(s)* allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	3133	(a)(1)	of the	Title 18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Sexual Extortion

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant did knowingly or intentionally coerce a complainant to engage in sexual conduct, by holding out, withholding, or threatening to withhold a service, employment, position or other thing of value while acting in a position of trust.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	8	4911	(a)(2)	of the	Title 18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Tampering with Public Records or Information

Acts of the accused associated with this Offense:

From 7/12/23 through 2/16/24, in a continuous course of conduct, the Defendant, with intent to defraud or injure, did knowingly make and present false therapy records with the intent that it be taken as a genuine part of his client's treatment documentation.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-135-25</u>	Date Filed: <u>6/24/2025</u>	OTN/LiveScan Number	Complaint Number	Incident Number MFI240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
4. This complaint consists of the preceding page(s) numbered 1 through 5.
5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

June 24 2025
(Date) (Year)

(Signature of Affiant)

AND NOW, on this date 06/24/2025 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

29.3-04
(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR. 135-25	Date Filed: 6/24/2025	OTN/LiveScan Number K 1012857-6	Complaint Number	Incident Number MF1240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

AFFIDAVIT of PROBABLE CAUSE

1. Your Affiant is Supervisory Special Agent Jennifer E. Snerr, Pennsylvania Office of Attorney General (OAG), Bureau of Criminal Investigations, Medicaid Fraud Control Section, located on the 7th Floor, Strawberry Square, at 320 Market Street, Harrisburg, PA 17101. Your Affiant is a law enforcement officer and as such is authorized to apply for, obtain and serve search warrants, make seizures and effectuate arrests. This affidavit is based on investigative work and an analysis of the documentation obtained during the course of the investigation.

2. The Defendant is Michael E. Miller, who currently resides at [REDACTED]. The Defendant was previously employed by Lycoming Therapeutic Wraparound Services, Inc. (Lycoming) a company which is located at 1521 Washington Boulevard, Williamsport, PA 17701 (Lycoming County) as a therapist. Lycoming is a Medical Assistance Provider through the Pennsylvania Department of Human Services. Community Care Behavioral Health Organization (CCBH), Pittsburgh, PA, is the Medical Assistance behavioral health managed care organization reimbursing with Medical Assistance funds for services for the clients of Lycoming. The Pennsylvania Medical Assistance Program pays CCBH a per capita amount per each member/Medical Assistance recipient and Lycoming bills and receives a fee for service reimbursement from CCBH.

3. This investigation was initiated on 11/21/24 based on a referral from the Pennsylvania Department of State (DOS) that the Defendant engaged in unethical sexual behavior/conduct with his patient ASR, a Medical Assistance Recipient during therapy sessions with her. The identity of ASR is known to your Affiant, but her initials are being used to protect her identity. The Defendant's conduct was originally reported to the Department of State Bureau of Enforcement and Investigations (DOS BEI) by ASR's new therapist and DOS reported it to the OAG.

4. As the Defendant is unlicensed, his counselling sessions were billed under Dr. John Neil, Psy.D. (MA Provider [REDACTED]). A review of the Provider Reimbursement Operations and Management Information System (in electronic format - PROMISE) database revealed there is one claim for procedure code 90791 (psychiatric diagnostic evaluation) on 7/12/23 and subsequent claims for procedure code 90837 (60 minute individual psychotherapy session) for ASR billed under Dr. Neil's provider number.

5. Your Affiant reviewed DOS BEI's investigative reports and investigator Alix Fils-Aime's (Fils-Aime) interview with ASR, during which she described sexual behavior with the Defendant which occurred during therapy sessions and during one home visit. In Fils-Aime's interview with the Defendant, the Defendant admitted to having inappropriate physical contact with ASR during therapy sessions. He explained the conduct evolved slowly from early onset of the first few sessions and increased in frequency or progression during all future sessions from the first session. He acknowledged that the contact and acts he engaged in with ASR was wrong.

6. On 1/16/25, your Affiant interviewed Blaire Neil (Blaire), Administrative Program Director and Dr. John Neil (Dr. Neil), Owner/Partner of Lycoming Therapeutic Wraparound Services, Inc. Blaire provided your Affiant with the Defendant's employment and training records, billing information and the contact and visit progress notes for ASR.

7. The Defendant was hired on 4/13/2020 by Lycoming. He worked both as a Behavior Consultant (BC) for their Intensive Behavioral Health Services clients and as an outpatient therapist. He was required to take multiple trainings through both the Department of Human Services and the University of Pittsburgh. Those trainings included discussions regarding boundaries between therapists and clients. Dr. Neil said that therapists should be very aware of those boundaries and should avoid conflicts or even the appearance of conflicts. After the trainings, the Defendant had to shadow other staff during their sessions. After the Defendant was allowed to see clients,



POLICE CRIMINAL COMPLAINT

Docket Number: CR-135-25	Date Filed: 6/24/2025	OTN/LiveScan Number K 1012857-4	Complaint Number	Incident Number MF1240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

AFFIDAVIT of PROBABLE CAUSE

alone, he still had to undergo periods of supervision. Supervision included both case discussion and observation. The Defendant received and signed for the employee handbook on 4/13/20, which includes a section on "inappropriate conduct." The handbook provides examples of "inappropriate conduct," and lists several things including but not limited to: failing to honor clients and professional boundaries; use, possession, or sale of illegal drugs; and sexual or other unlawful or unwelcomed harassment.

8. As ASR's therapist, the Defendant was supposed to provide outpatient therapy services. These services are to take place either in person at the office or through telehealth where the therapist is in the office and the client is at home. Under no circumstances should outpatient therapy ever take place in person in the client's home. The Defendant was paid based upon his employee agreement for outpatient therapy (procedure code 90837) at the hourly rate of \$30.00. The "Compensation" portion of his employee agreement reads "Staff shall be paid through Agency for services rendered and deemed billable through Pennsylvania's Medial Assistance Fee-for-Service entity, or its managed care company (CCBH) or private insurance."

9. Blaire said that on Thursday, 4/25/24, she was on the phone with CCBH representative Ashley Jackson (Jackson) who told her that CCHB had received a complaint concerning one of Lycoming's outpatient clients and needed to talk to Dr. Neil. Dr. Neil and Blaire called Jackson together and Jackson told them that the complaint came from a therapist who reported the Defendant, alleging that he had inappropriate boundaries with a client (ASR) and went to her house.

10. Blaire and the Defendant, who were both in the office, called Dr. Neil for a three way conversation from Dr. Neil's office. They confronted the Defendant with the allegations, which he initially denied. The Defendant was suspended pending further investigation. Dr. Neil called his company attorney and then spoke again to the Defendant. At that time the Defendant admitted to Dr. Neil that he had been to ASR's house, they did kiss, engaged in sexual activities, but did not have sexual intercourse. Dr. Neil told the Defendant that he had clearly crossed the line and that the Defendant could resign immediately or be terminated. The Defendant told Dr. Neil that he would resign and called Blaire and told her he was resigning. The Defendant told Blaire that he and ASR had a mutual attraction and they had gotten carried away. The Defendant said to Blaire that he lied, he was ashamed and afraid and that Blaire and Dr. Neil deserved better. The Defendant said to Blaire that he "fucked up." In May 2024, the Defendant sent Blaire and Dr. Neil a letter dated 5/9/24 apologizing for his "egregious lapse of judgement" and asking them for a job reference.

11. On 1/16/25 your Affiant interviewed ASR concerning her therapy sessions with the Defendant. ASR sought therapy from Lycoming in June 2023 for her borderline personality disorder and a history of sexual trauma. Lycoming only had one therapist available, the Defendant. Although ASR had never had a male therapist, she said she was open to it. ASR confirmed her first appointment with the Defendant was on 7/12/23, during which they completed paperwork. They discussed her family history and insurance information. ASR said that all of her sessions with the Defendant lasted about an hour as a rule.

12. ASR said the Defendant flirted with her from the very beginning. She stated that about one month or two at the most into her therapy with him, the Defendant started telling ASR things about his own personal life about his past relationships and included intimate sexual details. ASR said she sat on the floor during her sessions and the Defendant would slowly progress in sitting closer and closer to her. There were times she was laying on the floor and he would lay down next to her. She said often the Defendant would ask before he sat/lay down close to her. Equally as often after he got close to her, he'd say he felt "guilty" and that being close to her was "wrong." He also told her that he "wasn't supposed to be doing this." He would move away, but then come back to sit or lay close



POLICE CRIMINAL COMPLAINT

Docket Number: 02.135.25	Date Filed: 6/24/2025	OTN/LiveScan Number K 1012857-0	Complaint Number	Incident Number MF1240365143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

AFFIDAVIT of PROBABLE CAUSE

to her again. The Defendant would text her about appointments from his personal phone.

13. ASR said initially she didn't think anything of the Defendant's behavior. She said that she doesn't "get social cues" and said you have to be "pretty direct" with her. She talked to her friends about the Defendant, and they told her that his behavior was "weird" for a therapist and they suggested to her that the Defendant was "too interested in her." Her friends were concerned because they told her they didn't think she understood what was going on with him.

14. ASR said once the Defendant's sexual behavior started, she felt like it progressed more rapidly. She said that the Defendant smoked marijuana. ASR could tell when the Defendant smoked marijuana before a session, because she could smell it on him and his eyes were red. The Defendant would ask ASR if she "could tell" he'd been smoking. She told him she could. When that happened, he acted like he didn't care about anything she had to say unless it had to do with him and until she was sitting next to him. ASR said that when the Defendant smoked, "he became a self-centered asshole."

15. ASR estimated that the Defendant became more "touchy" going into the winter months and was slowly being less of a therapist. They would sit next to each other and her legs were on the Defendant's lap and he would touch and rub her legs. ASR said that she feels like any therapy that was still going on stopped all together at the end of December, and maybe even before that if she wasn't doing what the Defendant wanted her to do. She would talk or rant and the Defendant wouldn't listen. If he had been smoking, it was worse. She also explained that she was afraid that if she didn't let Miller touch her, she wouldn't get the therapy she needed and he might drop her as a client.

16. In either late December or early January during the latter part of a session in the office, ASR was laying on the couch on her stomach. The Defendant was sitting next to her and he put her legs on his lap. She was wearing leggings and he pulled her leggings down to her thighs and was touching her vagina with his hands. She said that was during the last 10 minutes of the session, and when the session was over, he told her "time's up." She recalled that day that it escalated very quickly. She recalled that the Defendant often escalated when she was questioning her sexuality. She would say to the Defendant, "I don't like men," and the Defendant seemed to be offended by that. He told her that the "right guy" hasn't come around and he could "change her mind."

17. ASR talked about the day that the Defendant came over to her house. It was Monday, 1/15/24. He texted her and told her if she didn't want to walk to her appointment he could just come to her house. She said that it was snowing very badly that day and the temperature was very cold. The Defendant also asked her by text if he could buy "weed" off of her as well. ASR recalled thinking that she would appreciate a ride because it was too cold to walk, and the Defendant said that he could just come over and all he was doing was "chilling" at home.

18. ASR said she was in the process of dying her hair and the Defendant texted that he could help her. Their session wasn't supposed to be until noon that day. When the Defendant offered to help her, she recalled thinking "that's not how this works but agreed to him coming over." She said the Defendant came over and she still had her dye in and was waiting for her hair to be done so she could wash out the dye. The Defendant kept asking if they could smoke. ASR sold the Defendant some of her marijuana and they smoked together.

19. When she needed to wash out the dye, the Defendant kept asking if he could take a shower with her. They showered together and he kept trying to touch her in the shower. The Defendant tried giving ASR oral sex, when they were both high. He told her that he felt "really guilty." ASR asked the Defendant if her insurance was paying



POLICE CRIMINAL COMPLAINT

Docket Number: CR-135-25	Date Filed: 6/24/2025	OTN/LiveScan Number K 1012857-6	Complaint Number	Incident Number MF1240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

AFFIDAVIT of PROBABLE CAUSE

for that day at her home. He told her yes. ASR estimated the Defendant was at her home that day from approximately 10:30 am until approximately 2:00 or 3:00 pm. She reviewed the Defendant's therapy note for 1/15/24. She said that day, when they were at her house, (not on a telehealth visit as documented), they didn't talk about anything at all and wouldn't have had the time to talk about all that he referenced that they discussed in that note. She commented he wrote a summary about her just to fill the space of the note. Also, she commented that at that time she was failing school terribly, yet he wrote that he gave her "validation and praise" concerning her school progress.

20. ASR said that the Defendant told her he had feelings for her, and he was "oddly jealous" when she talked to him about her past experiences with other men. She told him that was weird since the experiences she spoke to him about were not good ones. Pretty often, the Defendant told ASR that he felt like he was "taking advantage of her" and he felt "guilty" and his behavior was "wrong." He told her not to tell anyone about them because he didn't want to go to jail.

21. During ASR's last session with the Defendant, she was laying on the couch and he was sitting next to her. Her legs were on the Defendant's lap. He was rubbing her leg and trying to touch her. He told her that he hadn't had sex in a while. She asked him if he had tried anybody from Tinder and he told her he didn't want anybody from Tinder. He kept feeling up her leg and asked her if they could try having sex. He commented that his boss (who was right across the hall) wouldn't notice.

22. ASR told the Defendant she didn't really feel like it and the Defendant asked her if he could at least get a "blow job." Then he asked if he could "change her mind." Then ASR said the Defendant, just "went for it" and put his hands down her pants. She said that day she was wearing sweats and a crop top. She said when the Defendant put his hands down her pants, she "just froze." And that her body did not react because she was scared and she just "gave up." Seeing that, the Defendant said, "Ok time's up," and kept asking her to go. ASR said that she was crying when she ran out of the office after that last appointment.

23. She called her mom after she left that day and told her everything and then she sent the Defendant a text telling him she didn't want to see him anymore. ASR said the Defendant kept trying to call her after that, but she did not answer. He asked her over text for an appointment to sign off on her discharge papers, but she didn't answer him. After their last visit, the Defendant tried to schedule their discharge appointment (2/19/24) via text, but she didn't respond and did not ever agree to an appointment on that date or any appointments after (2/22/24 or 2/27/24).

24. ASR provided a copy of her text messages with the Defendant which started in October 2023. ASR said that she did not report the Defendant to anyone, other than talking to her friends and to her mother. After she talked to her current therapist about the Defendant, her therapist told her that she was obligated to report the Defendant's conduct. ASR said that most of what she talked to the Defendant about in her past relationships was about sexual interactions that were non-consensual. She said that it was one of the reasons why she had sought therapy.

25. On 2/4/25, I received claims data for ASR's therapy services with the Defendant from Ellie Medved, Senior Director of Compliance and Special Investigations Unit, CCBH. A review of the claims data verifies Lycoming billed for ASR for a clinical evaluation (7/12/23 - procedure code 90791) followed by 58 individual therapy sessions (7/17/23-2/16/24 - procedure code 90837). In total, Lycoming was reimbursed \$7,086.60 for services the Defendant represented were provided to ASR.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-135-25	Date Filed: 6/24/2025	OTN/LiveScan Number: K 1012857-6	Complaint Number	Incident Number MF1240355143F
Defendant Name	First: MICHAEL	Middle: E.	Last: MILLER	

AFFIDAVIT of PROBABLE CAUSE

26. On 2/14/25, your Affiant interviewed the Defendant who acknowledged that he was aware that his clients, and specifically ASR, were Medical Assistance recipients. He stated that he was trained by Lycoming upon hire and throughout his employment. Training included topics on ethics, sexuality, sexual behavior, and fraud, waste, and abuse. The Defendant received and signed for the employee handbook which addresses topics including conflicts of interest, correspondence via email and texting, conversations outside the office, communications on social media, use of phone and mail systems, the use of drugs and alcohol, employee conduct, and documentation. The Defendant acknowledged that he was paid by Lycoming for his sessions and those sessions were then billed for reimbursement through Medical Assistance.

27. The Defendant said ASR sought therapy for an eating disorder, trauma history involving unwanted sexual contact and assault, depression, and chronic suicidal ideation. The Defendant had his intake appointment with ASR on 7/12/23. The recommendation/plan was for outpatient therapy twice a week.

28. The Defendant said he shared personal information with ASR, despite that fact that he said doing so was not clinically relevant and unethical. The Defendant said that his emotional vulnerability led to intimacy which led to physical contact. During sessions, there was a blurring of the therapeutic relationship. They sat next to each other on the couch with ASR's feet on the Defendant's lap and her head on his shoulder. The Defendant said that he massaged her back or butt and put his hand under her leggings or sweatpants during sessions in the office. The Defendant said that he performed oral sex on ASR at the office during her sessions. The Defendant recalled telling ASR he felt guilty and conflicted about his behavior. He recalled telling her to keep it down as he didn't want anyone to walk in while they were in the office.

29. On 1/15/24, the Defendant asked ASR if he could come to her house. The Defendant knew ASR had marijuana and he offered to buy it from her. He went over to her house, hung out in her bedroom, purchased weed from her and smoked it with her, and he helped her dye her hair. They showered together and had oral sex. He described that day as a complete collapse of all ethics and boundaries and said that day was very fraudulent and he did the most legwork to cover it up as he billed that day as a telehealth session with information in the note about generalities of what they normally discussed. He commented that he understands that the other days were fraudulent too. The Defendant said that he and ASR were intimate during their last session (2/16/24). After that session, ASR indicated by text that she didn't want to continue with treatment. The Defendant said that he was selfish and took advantage of ASR's trust and commented sorry doesn't cover it.

30. I believe the facts contained in this Affidavit, are sufficient probable cause to warrant the arrest of the Defendant, Michael E. Miller, for the following crimes: Medicaid Fraud, 62 P.S. §1407(a)(1), (a)(4), (a)(6), (a)(7); Theft by Deception, 18 Pa.C.S. §3922(a)(1); Sexual Extortion, 18 Pa.C.S. §3133(a)(1); and Tampering with Public Records or Information, 18 Pa.C.S. §4911(a)(2).

31. I believe the facts set forth in this complaint are true and correct to the best of my information, knowledge, and belief, and any false statements made therein are made subject to the penalties of Section 4904 of the Crimes Code, 18 Pa.C.S. §4904 relating to Unsworn Falsification to Authorities.



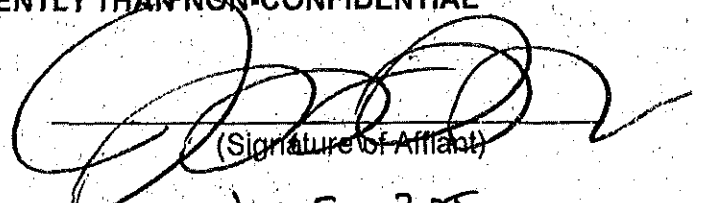
POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-135-25</u>	Date Filed: <u>6/24/2025</u>	OTN/LiveScan Number <u>101012857-0</u>	Complaint Number	Incident Number <u>MF1240355143F</u>
Defendant Name	First: <u>MICHAEL</u>	Middle: <u>E.</u>	Last: <u>MILLER</u>	

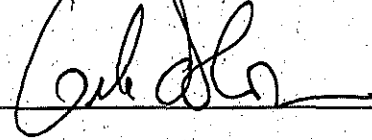
AFFIDAVIT of PROBABLE CAUSE

I, Jennifer E. Snerr, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.


(Signature of Affiant)

Sworn to me and subscribed before me this 24 day of JUNE 2025



Date _____, Magisterial District Judge

My commission expires first Monday of January, 2028

