

STATE OF NEW YORK
COUNTY OF MADISON

TOWN OF EATON COURT

THE PEOPLE OF THE STATE OF NEW YORK :

-against- :

CRYSTAL L. MILLER, :

Defendant. :

FELONY COMPLAINT

Case No.: SY/19-0470

STATE OF NEW YORK)

) ss.:

COUNTY OF MADISON)

Timothy Bates, Shield # [REDACTED], a Detective Investigator assigned to the Office of the New York State Attorney General Medicaid Fraud Control Unit, being duly sworn, deposes and states upon personal knowledge and upon information and belief, based upon sources including the ones described herein, as follows:

That on or about and between June 1, 2017, and August 21, 2019, at [REDACTED] in the [REDACTED] the Defendant, CRYSTAL MILLER, committed the offenses of:

Penal Law § 155.35(1) Grand Larceny in the Third Degree
D Felony
(1 count)

Penal Law § 175.35(1) Offering a False Instrument for Filing in the First Degree
E felony
(1 count)

Penal Law § 175.10 Falsifying Business Records in the First Degree
E felony
(1 count)

IN THAT THE DEFENDANT stole property with the intent to appropriate the property to herself, and the value of the property exceeded \$3,000.00 (Three Thousand Dollars); knowing that a written instrument contained a false statement or false information, and with intent to defraud the state or public benefit corporation of the state she offered or presented it to a public benefit corporation with the knowledge or belief that it will be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation; and with intent to defraud that includes an intent to commit another crime or to aid or conceal the

commission thereof, she made or caused a false entry in the business records of an enterprise.

The offenses were committed under the following circumstances:

Background

Defendant, a Licensed Practical Nurse enrolled as a provider of services in the New York State Medical Assistance Program ("Medicaid"), was employed as a private-duty nurse ("PDN") to provide nursing services to Medicaid Recipient John Doe, whose date of birth is [REDACTED] and whose identity is known to the Court and Defendant, from on or about and between August 25, 2015, and August 21, 2019.

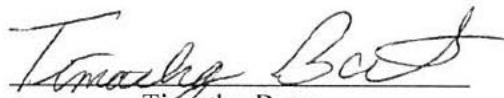
The Defendant Offered a False Instrument and Falsified Business Records Resulting in the Payment of Over Three-Thousand Dollars (\$3,000.0) the Defendant Was Not Entitled To.

The defendant offered for filing and submitted New York State Medical Assistance (Title XIX) claims, to the New York State Department of Health ("DOH"), on August 14, 2019 (claim 1922600229498230) for \$2,110.37 and on August 21, 2019 (claim 1923300230940030) for \$1,055.19. These claims were predicated on the assertion by the defendant that PDN services were provided, when in fact no such services were performed which caused a false entry in DOH business records. Relying on the accuracy of those claims, Medicaid, through its fiscal agent, paid the defendant \$3,165.56, to which she was not entitled.

In total, it was discovered that Defendant defrauded Medicaid in the amount of \$20,000.00 (Twenty Thousand Dollars). On August 23, 2019, your deponent interviewed and obtained a voluntary statement from Defendant who confirmed she was hired as a PDN to care for John Doe for 40 hours a week, yet she falsely submitted claims for 78 hours of work per week during the subject period.

The above allegations of fact are made by the Complainant herein based upon direct knowledge and upon information and belief, with the sources of the Complainant's information and grounds for his belief being the investigation conducted by members of and the files maintained by the Office of the New York State Attorney General, Medicaid Fraud Control Unit; a review of surveillance footage and logs from July 15, 2019, through July 31, 2019, from the location of John Doe's residence; the interview and the signed supporting deposition of Hilary Rounds, dated September 27, 2019, annexed hereto; and Complainant's interview of Defendant and Defendant's signed statement to the Office of the New York State Attorney General, dated August 23, 2019, annexed hereto.

Dated: June 16, 2025


Timothy Bates
Detective Investigator, Shield [REDACTED]

**False Statements Made Herein are Punishable as A Class A Misdemeanor
Pursuant to Section 210.45 of the Penal Law**