

CRIMINAL COURT OF THE CITY OF NEW YORK  
COUNTY OF BRONX

-----X	
THE PEOPLE OF THE STATE OF NEW YORK	X
	X
	X
-against-	X
	X
	X
JOSE ORTIZ and	X
AMERICAN BASE NO. 1, INC.	X
	X
Defendants.	X
-----X	

FELONY COMPLAINT  
Docket No.

State of New York     )  
County of Bronx     ) ss.:

Detective Ryan Last, Shield Number [REDACTED] of the Office of the New York Attorney General ("OAG"), Medicaid Fraud Control Unit ("MFCU"), 28 Liberty Street, New York, New York, being duly sworn, deposes and says the following:

That from on or about and between January 1, 2018, and November 20, 2020, at or near American Base No. 1, located at 3077 Third Avenue, Bronx, NY, 10451 and elsewhere in the State of New York, the defendants, acting in concert with, and aided and abetted by others known and unknown, committed the offenses of:

Count 1: Penal Law § 155.30(1)	Grand Larceny in the Fourth Degree (E Felony)
Count 2: Penal Law § 175.30(1)	Offering a False Instrument for Filing in the Second Degree (A Misdemeanor)

**IN THAT DEFENDANTS, JOSE ORTIZ and AMERICAN BASE NO. 1, acting in concert stole property in excess of one thousand dollars (\$1,000.00), and knowing that a written instrument contained a false statement and false information, knowingly offered and presented it to a public servant with the knowledge and belief that it would be filed with, registered or recorded in or otherwise become part of the records of such public office or public servant.**

This offense was committed under the following circumstances:

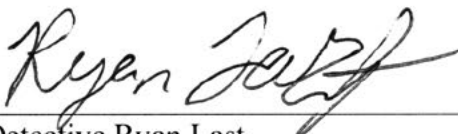
Defendant Jose Ortiz ("Defendant Ortiz"), was the high managerial agent of American Base No. 1 ("Corporate Defendant American Base"), a transportation company located at 3077 Third Avenue, Bronx, New York. Defendant American Base was an enrolled taxi provider in the New York State Medical Assistance

Program ("Medicaid"), which allowed Defendant American Base to submit claims for reimbursement for taxi services provided to Medicaid recipients to Medicaid.

Defendant Ortiz, acting individually and as high managerial agent of Corporate Defendant American Base, within the scope of his employment, knowingly submitted and caused to be submitted claims to Medicaid that falsely represented that Corporate Defendant American Base provided taxi services to Medicaid recipients that complied with all applicable laws, rules, and regulations of Medicaid. Those claims were false and invalid in that the claimed taxi services were predicated on unlawful kickback payments to recipients and/or the taxi services were never provided at all or as claimed. Relying on those false claims, Medicaid, through its fiscal agent, paid Defendants in excess of one thousand dollars (\$1,000.00) to which the Defendants were not entitled.

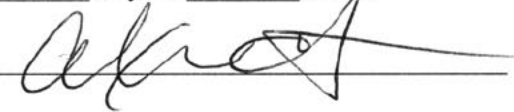
The above allegations of fact are made by the deponent herein upon direct knowledge and upon information and belief, with the sources of deponent's information and the grounds for his belief being his review of the file on this matter maintained by MFCU, including records obtained by the New York State Department of Health, the New York State Department of State, conversations with other members of MFCU, and interviews of witnesses known to the deponent.

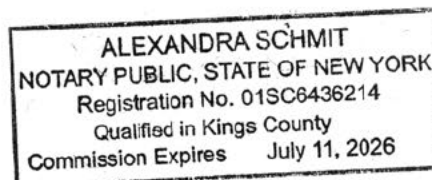
Dated: June 24, 2025  
New York, New York

  
\_\_\_\_\_  
Detective Ryan Last  
Shield Number [REDACTED]

Sworn to before me this

25 day of June, 2025

  
\_\_\_\_\_  
Notary Public



**False Statements Made Herein Are Punishable As A Class A Misdemeanor  
Pursuant To Section 210.45 Of The Penal Law.**