

STATE OF MICHIGAN 54B JUDICIAL DISTRICT 30L JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 97-25900797-01 AGHC #: 2024-0412065
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District Court ORI: MI330065J 101 Linden Street East Lansing, MI 48823 517-351-7000	Circuit Court ORI: MI330055J 313 W. Kalamazoo P.O. Box 40771 Lansing, MI 48901 517-483-6500	AGHC ORI: MI330035A
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THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address V JAMES ALEXANDER CARTHON [REDACTED]	Victim or complainant STATE OF MICHIGAN
		Complaining Witness SA SCOTT DAWSON

Co-defendant(s) (If known)	Date: On or about MAY 31, 2024 - SEPT 27, 2024
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City/Twp./Village Ingham County	County in Michigan INGHAM	Defendant TCN	Defendant CTN [REDACTED]	Defendant SID [REDACTED]	
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Defendant DLN Put DLN in Ref. No. row 3 on MC 97	DLN Type: Oper./Chauf	Vehicle Type	Defendant Sex M	Defendant Race B

Police agency report no. HC [REDACTED]	Charge See below	Maximum penalty See below
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A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.

Witnesses

State of Michigan SA Scott Dawson

STATE OF MICHIGAN, COUNTY OF INGHAM

The complaining witness says that on the date, the defendant, contrary to law,

COUNT 1: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]

FELONY: 4 Years and/or \$50,000.00

COUNT 2: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]

FELONY: 4 Years and/or \$50,000.00

COUNT 3: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]

FELONY: 4 Years and/or \$50,000.00

COUNT 4: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]

FELONY: 4 Years and/or \$50,000.00

COUNT 5: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]

FELONY: 4 Years and/or \$50,000.00

COUNT 6: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]

FELONY: 4 Years and/or \$50,000.00

COUNT 7: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 8: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 9: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 10: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 11: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 12: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 13: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 14: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 15: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 16: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 17: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 18: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 19: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 20: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 21: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 22: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT 23: MEDICAID FRAUD - FALSE CLAIM

did knowingly make, present, or cause to be made or presented to a state employee or officer a false claim under the social welfare act, being MCL 400.1 et seq; contrary to MCL 400.607(1). [400.6071]
FELONY: 4 Years and/or \$50,000.00

COUNT	BENEFICIARY	DATE OF SERVICE	CPT CODE	STATUS
1	B.A.	05/31/2024	99443	PAID \$110.00
2	B.A.	06/14/2024	99443	PAID \$110.00
3	B.A.	07/02/2024	99443	PAID \$119.82
4	B.A.	07/15/2024	99443	PAID \$110.00
5	B.A.	08/01/2024	99443	PAID \$110.00
6	B.A.	08/16/2024	99443	PAID \$110.00
7	B.A.	09/07/2024	99443	PAID \$110.00
8	B.A.	09/26/2024	99443	PAID \$110.00
9	J.C.	05/31/2024	99443	PAID \$110.00
10	J.C.	06/14/2024	99443	PAID \$110.00
11	J.C.	07/02/2024	99443	PAID \$119.82
12	J.C.	07/15/2024	99443	PAID \$110.00
13	J.C.	08/01/2024	99443	PAID \$110.00
14	J.C.	08/16/2024	99443	PAID \$110.00
15	J.C.	09/07/2024	99443	PAID \$110.00

16	J.C.	09/27/2024	99443	PAID \$110.00
17	K.P.	05/31/2024	99443	PAID \$110.00
18	K.P.	06/13/2024	99443	PAID \$110.00
19	K.P.	06/28/2024	99443	PAID \$119.82
20	K.P.	08/01/2024	99443	PAID \$110.00
21	K.P.	08/16/2024	99443	PAID \$110.00
22	K.P.	09/07/2024	99443	PAID \$110.00
23	K.P.	09/27/2024	99443	PAID \$110.00

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

The complaining witness asks that the defendant be apprehended and dealt with according to law.

Warrant authorized on <u>06/24/2025</u> by:  Date
Timothy C. Erickson (P72071) Assistant Attorney General, Health Care Fraud Division P.O. Box 30218, Lansing, MI 48909 (517) 241-6500
<input type="checkbox"/> Security for costs posted

I declare under the penalties of perjury that this complaint has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Complaining Witness Signature

Date

MC 200w (4/25) FELONY SET, Complaint (PACC-PAAM Replacement)

MCL 764.1 et seq., MCL 766.1 et seq., MCL 767.1 et seq., MCR 6.101
MCR 6.102