

|   |                                   |  |
|---|-----------------------------------|--|
| <b>STATE OF MICHIGAN</b><br><b>54B JUDICIAL DISTRICT</b><br><b>30L JUDICIAL CIRCUIT</b> | <b>COMPLAINT</b><br><b>FELONY</b> | <b>DISTRICT:</b><br><b>CIRCUIT:</b><br><b>CTN: 97-25900797-01</b><br><b>AGHC #: 2024-0412065</b> |
|---|-----------------------------------|--|

|  |  |                            |
|--|--|----------------------------|
| District Court ORI: <b>MI330065J</b><br>101 Linden Street East Lansing, MI 48823<br>517-351-7000 | Circuit Court ORI: <b>MI330055J</b><br>313 W. Kalamazoo P.O. Box 40771 Lansing, MI 48901<br>517-483-6500 | AGHC ORI: <b>MI330035A</b> |
|--|--|----------------------------|

|  |  |  |
|--|--|--|
| <b>THE PEOPLE OF THE</b><br><b>STATE OF MICHIGAN</b> | Defendant's name and address<br><b>V JAMES ALEXANDER CARTHON</b><br>[REDACTED]<br>[REDACTED] | Victim or complainant<br><b>STATE OF MICHIGAN</b><br>Complaining Witness<br><b>SA SCOTT DAWSON</b> |
|--|--|--|

|                            |  |
|----------------------------|--|
| Co-defendant(s) (If known) | Date: On or about<br><b>MAY 31, 2024 - SEPT 27, 2024</b> |
|----------------------------|--|

|  |  |                                     |                             |                             |                            |
|--|--|-------------------------------------|-----------------------------|-----------------------------|----------------------------|
| City/Twp./Village<br><b>Ingham County</b>                  | County in Michigan<br><b>INGHAM</b>                        | Defendant TCN                       | Defendant CTN<br>[REDACTED] | Defendant SID<br>[REDACTED] |                            |
| Defendant DOB<br><b>Put DOB in Ref. No. row 1 on MC 97</b> | Defendant DLN<br><b>Put DLN in Ref. No. row 3 on MC 97</b> | DLN Type:<br><b>Oper./Chauf</b>     | Vehicle Type                | Defendant Sex<br><b>M</b>   | Defendant Race<br><b>B</b> |
| Police agency report no.<br><b>HC [REDACTED]</b>           | Charge<br><b>See below</b>                                 | Maximum penalty<br><b>See below</b> |                             |                             |                            |

[ ] 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 06/24/2025 by:  

Date

Timothy C. Erickson (P72071)  
Assistant Attorney General, Health Care Fraud Division  
P.O. Box 30218, Lansing, MI 48909 (517) 241-6500

☐ 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