

STATE OF MICHIGAN 54B JUDICIAL DISTRICT 30L JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 97-26900504-01 AGHC #: 2025-0436894
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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 JOHN ANTHONY KEMPAINEN [REDACTED] OAK PARK, MI [REDACTED]	Victim or complainant STATE OF MICHIGAN Complaining Witness SA RON SKARZNSKI
Co-defendant(s) (If known)		Date: On or about 01/2023 THROUGH 06/2025

City/Twp./Village Lansing	County in Michigan INGHAM	Defendant TCN	Defendant CTN 97-26900504-01	Defendant SID 4440232L
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
Police agency report no. HC 2025-0436894	Charge See below	Defendant Race W	Maximum penalty See below	

☐ A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.

Witnesses: State of Michaign SA Ron Skarznski

STATE OF MICHIGAN, COUNTY OF INGHAM

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

COUNT 1: MEDICAID FRAUD - FALSE CLAIM – (SEE ATTACHED CHART)

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 – (SEE ATTACHED CHART)

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 - (SEE ATTACHED CHART)

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 - (SEE ATTACHED CHART)

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 - (SEE ATTACHED CHART)

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 - (SEE ATTACHED CHART)

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	PROCEDURE CODE	STATUS MEDICAID
1	S. G-K	03/09/2025	H2015 Comprehensive community support services-per 15 minutes	PAID (Area Agency on Aging)
2	S. G-K	03/26/2025	H2015 Comp comm supp svc-15	PAID (Area Agency on Aging)
3	S. G-K	04/25/2025	H2015 Comp comm supp svc-15	PAID (Area Agency on Aging)
4	S. G-K	05/16/2025	H2015 Comp comm supp svc-15	PAID (Area Agency on Aging)
5	S. G-K	05/30/2025	H2015 Comp comm supp svc-15	PAID (Area Agency on Aging)
6	S. G-K	06/10/2025	H2015 Comp comm supp svc-15	PAID (Area Agency on Aging)

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>06/22/2026</u> by:  Date
Dennis Phenev, Jr (P48825) 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