

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

-against-

FRANCIA AGUILA (F 53),

STEINWAY HOPE MEDICAL, LLC

Defendants.

FELONY

Docket No.

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

Detective Nefertiti Clarke, Shield # 2398, of the New York State Office of the 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 March 16, 2021 and November 12, 2024, at or near Steinway Hope Medical LLC ("Defendant Steinway"), located at [REDACTED] in the County of Queens, and elsewhere in the State of New York, the defendant, Francia Aguila ("Defendant Aguila"), acting in concert with, and as a part-owner and high managerial agent of Defendant Steinway, an outpatient general practice, and others known and unknown, committed the offenses of:

Count 1: Education Law § 6512(1) Unauthorized Practice of a Profession (*E Felony*)

Count 2: Penal Law § 175.10 Falsifying Business Records in the First Degree (*E Felony*)

Count 3: Education Law § 6513(1) Unauthorized Use of a Professional Title (*A Misdemeanor*)

IN THAT DEFENDANT AGUILA, individually and as a part-owner and high managerial agent acting within the scope of her employment and in behalf of Defendant Steinway acting in concert with others known and unknown: (1) not being authorized to practice medicine for which a license was a prerequisite, practiced, offered to practice, and held herself out as being able to practice medicine, by diagnosing, treating, operating, and prescribing medication to patients for human disease, pain, injury, deformity and physical condition for which she was not authorized; (2) with the intent to defraud, which included an intent to commit another crime and to aid and conceal the commission thereof, made or caused to be made a false entry in the business records of Defendant Steinway; and (3) on one or more occasions, not being authorized to use a professional title regulated under Article 130 of the New York State Education Law, used such professional title.

The offenses were committed under the following circumstances:

Background

Defendant Aguila was a member, part-owner and employee of Defendant Steinway, a purported medical clinic. Gifty Appiah ("Appiah"), a licensed Nurse Practitioner in the State of New York charged in a separate felony complaint filed in this Court, was contracted by Defendant Steinway as the sole provider of medical services to patients at Defendant Steinway. Appiah was an enrolled provider in the New York State Medical Assistance Program ("Medicaid"), a health plan. Defendant Steinway, utilizing Appiah's name and credentials, contracted with multiple Medicaid-funded Managed Care Organizations ("MCOs"), including Fidelis Care, Healthfirst, and MetroPlus, which allowed Defendant Steinway to submit claims for reimbursement to, and to be paid by MCOs with Medicaid funds.

During the relevant time period, Defendant Aguila did not possess a license to practice any profession in any capacity, including the professions of medicine and nursing, in the State of New York.

Defendant Aguila's Unauthorized Practice of Medicine and Unauthorized Use of a Title

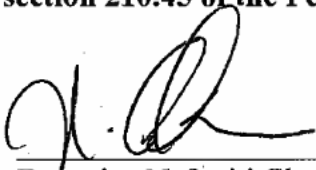
Defendant Aguila, on one or more occasions during the above time period, held herself out as a Medical Doctor at Steinway by referring to herself and having others refer to her as "Dr. Fran" and physically examined patients who went to Steinway for bona fide medical treatment. During these examinations, on one or more occasions, wearing a white coat, Defendant Aguila, among other aspects of a medical exam, utilized a stethoscope to listen to patients' heart and lungs and a penlight to examine patients' eyes. Further, Defendant Aguila prescribed medications to patients after her purported examinations utilizing Appiah's identity and professional credentials.

Defendant Steinway's Falsifying Business Records

Defendant Aguila, on one or more occasions, on or about and between March 16, 2021 and November 12, 2024, entered and caused to be entered into Defendant Steinway's electronic medical record system, entries that falsely documented that Appiah, a licensed Nurse Practitioner, examined patients, including patients enrolled in Medicaid, when in fact Defendant knew that she examined those patients even though she did not possess a license to practice medicine. Those false entries were utilized to submit or cause to be submitted claims for payment to MCOs, and in reliance of those false entries, MCOs paid Defendant Steinway in excess of ten thousand dollars (\$10,000.00) for which neither Defendant Aguila, nor Defendant Steinway, were 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 her belief being her 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 Education Department, and upon conversations with other members of MFCU assigned to this matter and interviews of witnesses known to the deponent.

False statements made in this written instrument are punishable as a class A misdemeanor pursuant to section 210.45 of the Penal Law, and as other crimes.



Detective Nefertiti Clarke

6/18/26
Date

16 45
Time