

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS, CRIMINAL TERM

-----X
THE PEOPLE OF THE STATE OF NEW YORK

- against -

INDICTMENT NO. _____
GRAND JURY NO. JD 00689-2026

1. **MAKSIM GRINBERG**
2. **FAMILY EYE CARE OPHTHALMOLOGY, P.C.**
3. **9TH STREET VISION CARE, INC.**
4. **HARLEM EYE CARE, INC.**
5. **PARKSLOPE EYE CARE, INC.**
6. **GRAHAM EYE CARE, LLC**
7. **FLATBUSH EYE CARE, INC.**
8. **MGBK MANAGEMENT, LLC**
9. **EYEPIC, INC.**

Defendants.

-----X

- COUNT 1 GRAND LARCENY IN THE FIRST DEGREE,
PENAL LAW §155.42(1)
[Defendants 1, 2, 4, 5, 6, and 7]
- COUNT 2 GRAND LARCENY IN THE FIRST DEGREE,
PENAL LAW §155.42(1)
[Defendants 1, 4, 5, 6, and 7]
- COUNT 3 GRAND LARCENY IN THE SECOND DEGREE
PENAL LAW §155.42(1)
[Defendants 1 and 3]

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- COUNT 4 HEALTH CARE FRAUD IN THE FIRST DEGREE,
PENAL LAW §177.25
[Defendants 1, 2, 3, 4, 5, 6, and 7]
- COUNT 5 HEALTH CARE FRAUD IN THE FIRST DEGREE,
PENAL LAW §177.25
[Defendants 1, 2, 3, 4, 5, 6, and 7]
- COUNT 6 SCHEME TO DEFRAUD IN THE FIRST DEGREE,
PENAL LAW §190.65(1)(b)
[Defendants 1, 2, 3, 4, 5, 6, 7, 8, and 9]
- COUNT 7 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE,
PENAL LAW §175.10
[Defendants 1 and 6]
- COUNT 8 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE,
PENAL LAW §175.10
[Defendants 1 and 6]
- COUNT 9 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE,
PENAL LAW §175.10
[Defendants 1 and 4]
- COUNT 10 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE,
PENAL LAW §175.10
[Defendants 1 and 4]
- COUNT 11 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE,
PENAL LAW §175.10
[Defendants 1 and 6]
- COUNT 12 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE,
PENAL LAW §175.10
[Defendants 1 and 6]
- COUNT 13 OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PENAL LAW §175.35
[Defendants 1 and 6]
- COUNT 14 OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PENAL LAW §175.35
[Defendants 1 and 4]

COUNT 15 OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PENAL LAW §175.35
[Defendants 1 and 6]

M Panel, 3rd Term
June 4, 2026

A TRUE BILL



GRAND JURY FOREPERSON

Dated: 6-4-26
KINGS, New York

LETITIA JAMES
ATTORNEY GENERAL
STATE OF NEW YORK

Medicaid Fraud Control Unit
28 Liberty Street, 13th floor
New York, NY 10005

COUNT ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG, FAMILY EYE CARE OPHTHALMOLOGY, P.C., HARLEM EYE
CARE, INC., PARKSLOPE EYE CARE, INC., GRAHAM EYE CARE, LLC, and FLATBUSH
EYE CARE, INC. of committing the crime of **GRAND LARCENY IN THE FIRST
DEGREE**, in violation of Penal Law §155.42(1), committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendants FAMILY EYE CARE OPHTHALMOLOGY, P.C., HARLEM EYE CARE, INC., PARKSLOPE EYE CARE, INC., GRAHAM EYE CARE, LLC, and FLATBUSH EYE CARE, INC., acting in concert with each other and others known and unknown to the Grand Jury, from on or about and between January 1, 2024 and July 31, 2025, in the County of KINGS and elsewhere in the State of New York, stole property from Fidelis Care New York ("Fidelis"), a managed care organization funded by the New York State Medical Assistance Program ("Medicaid"), and the value of said property exceeded one million dollars (\$1,000,000.00), to wit: the defendants submitted, and caused to be submitted, claims for reimbursement to Fidelis, which falsely represented that Defendants provided ophthalmology services to numerous Medicaid recipients consistent with Medicaid rules and regulations, when in fact those services were not provided or not provided as claimed, and in reliance on Defendants' false claims, Fidelis paid defendants in excess of one-million dollars (\$1,000,000.00) to which they were not entitled.

COUNT TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG, HARLEM EYE CARE, INC., PARKSLOPE EYE CARE, INC.,
GRAHAM EYE CARE, LLC, and FLATBUSH EYE CARE, INC. of committing the crime of
GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law §155.42(1),
committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting
within the scope of his employment and in behalf of corporate defendants HARLEM EYE
CARE, INC., PARKSLOPE EYE CARE, INC., GRAHAM EYE CARE, LLC, and FLATBUSH
EYE CARE, INC. acting in concert with each other and others known and unknown to the Grand
Jury, from on or about and between January 1, 2024 and July 31, 2025 in the County of KINGS
and elsewhere in the State of New York, stole property from Healthfirst PHSP, Inc.
("Healthfirst"), a managed care organization funded by the New York State Medical Assistance
Program ("Medicaid"), and the value of said property exceeded one million dollars
(\$1,000,000.00), to wit: the defendants submitted, and caused to be submitted, claims for
reimbursement to Healthfirst, which falsely represented that Defendants provided ophthalmology
services to numerous Medicaid recipients consistent with Medicaid rules and regulations, when
in fact those services were not provided or not provided as claimed, and in reliance on
Defendants' false claims, Healthfirst paid defendants in excess of one-million dollars
(\$1,000,000.00) to which they were not entitled.

COUNT THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and 9TH STREET VISION CARE, INC. of committing the crime of
GRAND LARCENY IN THE SECOND DEGREE, in violation of Penal Law §155.40(1),
committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting
within the scope of his employment and in behalf of corporate defendant 9TH STREET VISION
CARE, INC., acting in concert with each other and others known and unknown to the Grand
Jury, from on or about and between January 1, 2024 and July 31, 2025, in the County of KINGS
and elsewhere in the State of New York, stole property from Molina Healthcare of New York
("Molina"), a managed care organization funded by the New York State Medical Assistance
Program ("Medicaid"), and the value of said property exceeded fifty thousand dollars
(\$50,000.00), to wit: the defendants submitted, and caused to be submitted, claims for
reimbursement to Molina, which falsely represented that Defendants provided ophthalmology
services to numerous Medicaid recipients consistent with Medicaid rules and regulations, when
in fact those services were not provided or not provided as claimed, and in reliance on
Defendants' false claims, Molina paid defendants in excess of fifty-thousand dollars
(\$50,000.00) to which they were not entitled.

COUNT FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG, FAMILY EYE CARE OPHTHALMOLOGY, P.C., 9TH STREET
VISION CARE, INC., HARLEM EYE CARE, INC., PARKSLOPE EYE CARE, INC.,
GRAHAM EYE CARE, LLC, and FLATBUSH EYE CARE, INC. of committing the crime of
HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law §177.25,
committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting
within the scope of his employment and in behalf of corporate defendants FAMILY EYE CARE
OPHTHALMOLOGY, P.C., 9TH STREET VISION CARE, INC., HARLEM EYE CARE, INC.,
PARKSLOPE EYE CARE, INC., GRAHAM EYE CARE, LLC, and FLATBUSH EYE CARE,
INC., acting in concert with each other and others known and unknown to the Grand Jury, from on
or about and between January 1, 2024 and December 31, 2024, in the County of KINGS and
elsewhere in the State of New York, with intent to defraud a health plan, knowingly and willfully
provided materially false information and omitted material information for the purpose of
requesting payment from a health plan for a health care item and service, and as a result of such
information and omission, the defendants wrongfully received payment or the payment of a
portion of the payment, as the case may be, from a single health plan, in a period of not more
than one year, exceeded one million dollars (\$1,000,000.00) in the aggregate, to wit: the
defendants knowingly and willfully submitted false claims and omitted material information
from claims for reimbursement submitted to Fidelis Care New York, Healthfirst PHSP, Inc., and
Molina Healthcare of New York, managed care organizations funded by the New York State

Medical Assistance Program ("Medicaid"), and as a result, the defendants wrongfully received in excess of one million dollars (\$1,000,000.00) in the aggregate to which they were not entitled.

COUNT FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG, FAMILY EYE CARE OPHTHALMOLOGY, P.C., 9TH STREET
VISION CARE, INC., HARLEM EYE CARE, INC., PARKSLOPE EYE CARE, INC.,
GRAHAM EYE CARE, LLC, and FLATBUSH EYE CARE, INC. of committing the crime of
HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law §177.25,
committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendants FAMILY EYE CARE OPHTHALMOLOGY, P.C., 9TH STREET VISION CARE, INC., HARLEM EYE CARE, INC., PARKSLOPE EYE CARE, INC., GRAHAM EYE CARE, LLC, and FLATBUSH EYE CARE, INC. acting in concert with each other and others known and unknown to the Grand Jury, from on or about and between January 1, 2025 and July 31, 2025, in the County of KINGS and elsewhere in the State of New York, with intent to defraud a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from a health plan for a health care item and service, and as a result of such information and omission, the defendants wrongfully received payment or the payment of a portion of the payment, as the case may be, from a single health plan, in a period of not more than one year, exceeded one million dollars (\$1,000,000.00) in the aggregate, to wit: the defendants knowingly and willfully submitted false claims and omitted material information from claims for reimbursement submitted to Fidelis Care New York, Healthfirst PHSP, Inc., and Molina

Healthcare of New York, managed care organizations funded by the New York State Medical Assistance Program ("Medicaid"), and as a result, the defendants wrongfully received in excess of one million dollars (\$1,000,000.00) in the aggregate to which they were not entitled.

COUNT SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses MAKSIM GRINBERG, FAMILY EYE CARE OPHTHALMOLOGY, P.C., 9TH STREET VISION CARE, INC., HARLEM EYE CARE, INC., PARKSLOPE EYE CARE, INC., GRAHAM EYE CARE, LLC, FLATBUSH EYE CARE, INC., MGBK MANAGEMENT, LLC, and EYEPIC, INC. of committing the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE**, in violation of Penal Law §190.65(1)(b), committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendants FAMILY EYE CARE OPHTHALMOLOGY, P.C., 9TH STREET VISION CARE, INC., HARLEM EYE CARE, INC., PARKSLOPE EYE CARE, INC., GRAHAM EYE CARE, LLC, FLATBUSH EYE CARE, INC., MGBK MANAGEMENT, LLC, and EYEPIC, INC. acting in concert with each other and others known and unknown to the Grand Jury, from on or about and between January 1, 2024 and July 31, 2025, in the County of KINGS and elsewhere in the State of New York, engaged in a scheme constituting a systematic ongoing course of conduct with the intent to defraud more than one person and to obtain property from more than one person by false and fraudulent pretenses, representations and promises and so obtained property with a value in excess of one thousand dollars (\$1,000) from one or more such persons.

COUNT SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and GRAHAM EYE CARE, LLC of committing the crime of
FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law
§175.10, committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting
within the scope of his employment and in behalf of corporate defendant GRAHAM EYE CARE,
LLC, acting in concert with each other and others known and unknown to the Grand Jury, from on
or about and between February 1, 2025 and March 4, 2025, in the County of KINGS and elsewhere
in the State of New York, with the intent to defraud, which included an intent to commit another
crime and to aid and conceal the commission thereof, made and caused to be made false entries
in the business records of GRAHAM EYE CARE, LLC, a business enterprise, to wit: a superbill
related to services purportedly rendered on or about January 24, 2024 to M.K., a New York State
Medical Assistance Program ("Medicaid") recipient whose full name is known to the Grand
Jury.

COUNT EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and GRAHAM EYE CARE, LLC of committing the crime of
FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law
§175.10, committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting
within the scope of his employment and in behalf of corporate defendant GRAHAM EYE CARE,

LLC, acting in concert with each other and others known and unknown to the Grand Jury, from on or about and between February 1, 2025 and March 4, 2025, in the County of KINGS and elsewhere in the State of New York, with the intent to defraud, which included an intent to commit another crime and to aid and conceal the commission thereof, made and caused to be made false entries in the business records of GRAHAM EYE CARE, LLC, a business enterprise, to wit: electronic health records related to services purportedly rendered on or about January 24, 2024 to M.K., a New York State Medical Assistance Program ("Medicaid") recipient whose full name is known to the Grand Jury.

COUNT NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses MAKSIM GRINBERG and HARLEM EYE CARE, INC. of committing the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant HARLEM EYE CARE, INC., acting in concert with each other and others known and unknown to the Grand Jury, from on or about and between February 1, 2025 and March 4, 2025, in the County of KINGS and elsewhere in the State of New York, with the intent to defraud, which included an intent to commit another crime and to aid and conceal the commission thereof, made and caused to be made false entries in the business records of HARLEM EYE CARE, INC., a business enterprise, to wit: a superbill related to services purportedly rendered on or about February 9, 2024 to C.V., a New York State Medical Assistance Program ("Medicaid") recipient whose full name is known to the Grand Jury.

COUNT TEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and HARLEM EYE CARE, INC. of committing the crime of
FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law
§175.10, committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting
within the scope of his employment and in behalf of corporate defendant HARLEM EYE CARE,
INC., acting in concert with each other and others known and unknown to the Grand Jury, from on
or about and between February 1, 2025 and March 4, 2025, in the County of KINGS and elsewhere
in the State of New York, with the intent to defraud, which included an intent to commit another
crime and to aid and conceal the commission thereof, made and caused to be made false entries
in the business records of HARLEM EYE CARE, INC., a business enterprise, to wit: electronic
health records related to services purportedly rendered on or about February 9, 2024 to C.V., a
New York State Medical Assistance Program ("Medicaid") recipient whose full name is known
to the Grand Jury.

COUNT ELEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and GRAHAM EYE CARE, LLC of committing the crime of
FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law
§175.10, committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting
within the scope of his employment and in behalf of corporate defendant GRAHAM EYE CARE,

LLC, acting in concert with each other and others known and unknown to the Grand Jury, from on or about and between February 1, 2025 and March 4, 2025, in the County of KINGS and elsewhere in the State of New York, 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 false entries in the business records of GRAHAM EYE CARE, LLC, a business enterprise, to wit: a superbill related to services purportedly rendered on or about June 13, 2024 to M.V., a New York State Medical Assistance Program ("Medicaid") recipient whose full name is known to the Grand Jury.

COUNT TWELVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and GRAHAM EYE CARE, LLC of committing the crime of
FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law
§175.10, committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GRAHAM EYE CARE, LLC, acting in concert with each other and others known and unknown to the Grand Jury, from on or about and between February 1, 2025 and March 4, 2025, in the County of KINGS and elsewhere in the State of New York, 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 false entries in the business records of GRAHAM EYE CARE, LLC, a business enterprise, to wit: electronic medical records related to services purportedly rendered on or about June 13, 2024 to M.V., a New York State Medical Assistance Program ("Medicaid") recipient whose full name is known to the Grand Jury.

COUNT THIRTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and GRAHAM EYE CARE, LLC of committing the crime of
OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in
violation of Penal Law §175.35 (1), committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GRAHAM EYE CARE, LLC, acting in concert with each other and others known and unknown to the Grand Jury, on or about February 9, 2024, in the County of KINGS and elsewhere in the State of New York, knowing that a written instrument contained a false statement and false information, and with the intent to defraud the state of New York, the defendants offered and presented that written instrument to a public office with the knowledge and belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, to wit: a New York State Medical Assistance Program ("Medicaid") claim for reimbursement with the assigned Original Claim Number 24054P6655620301 related to services purportedly rendered on or about January 24, 2024 to M.K., a Medicaid recipient whose full name is known to the Grand Jury, with knowledge that the claim would become a part of the records of the New York State Department of Health.

COUNT FOURTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and HARLEM EYE CARE, INC. of committing the crime of
OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in
violation of Penal Law §175.35(1), committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant HARLEM EYE CARE, INC., acting in concert with each other and others known and unknown to the Grand Jury, on or about April 9, 2024, in the County of KINGS and elsewhere in the State of New York, knowing that a written instrument contained a false statement and false information, and with the intent to defraud the state of New York, the defendants offered and presented that written instrument to a public office with the knowledge and belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, to wit: a New York State Medical Assistance Program ("Medicaid") claim for reimbursement with the assigned Original Claim Number 24114P8795066001 related to services purportedly rendered on or about February 9, 2024 to C.V., a Medicaid recipient whose full name is known to the Grand Jury, with knowledge that the claim would become a part of the records of the New York State Department of Health.

COUNT FIFTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses
MAKSIM GRINBERG and GRAHAM EYE CARE, LLC of committing the crime of
OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE, in
violation of Penal Law §175.35(1), committed as follows:

Defendant MAKSIM GRINBERG, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GRAHAM EYE CARE, LLC, acting in concert with each other and others known and unknown to the Grand Jury, on or about July 16, 2024, in the County of KINGS and elsewhere in the State of New York, knowing that a written instrument contained a false statement and false information, and with the intent to defraud the state of New York, the defendants offered and presented that written instrument to a public office with the knowledge and belief that it would be filed with, registered or recorded in or otherwise become a part of the records of such public office, to wit: a New York State Medical Assistance Program ("Medicaid") claim for reimbursement with the assigned Original Claim Number 24214P3752440501 related to services purportedly rendered on or about June 13, 2024 to M.V., a Medicaid recipient whose full name is known to the Grand Jury, with knowledge that the claim would become a part of the records of the New York State Department of Health.