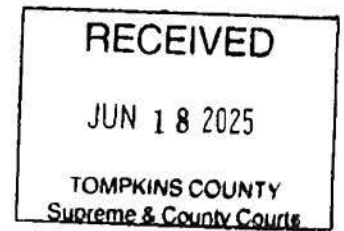


STATE OF NEW YORK  
SUPERIOR COURT

HON. MAURA KENNEDY-SMITH  
COUNTY OF TOMPKINS



---

THE PEOPLE OF THE STATE OF NEW YORK

-versus-

DAVID MOORE

---

SUPERIOR COURT  
INFORMATION

SC1-70224-25

FIRST COUNT

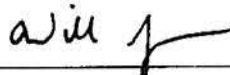
BE IT KNOWN THAT I, WILLIAM GARGAN, Special Assistant Attorney General in the Medicaid Fraud Control Unit, appearing of counsel to LETITIA JAMES, Attorney General of the State of New York, by this Superior Court Information, do hereby accuse the above-named defendant, DAVID MOORE, of Grand Larceny in the Second Degree, a class C Felony, in violation of § 155.40(1) of the Penal Law of the State of New York, committed as follows:

The defendant, DAVID MOORE, on or about and between January 1, 2019, and August 31, 2023, in the Town of Enfield, County of Tompkins, and elsewhere in the State of New York, with the intent to deprive another of property and to appropriate the same to himself, wrongfully took, obtained, or withheld such property valued in excess of fifty thousand dollars (\$50,000.00) from an owner thereof, to wit, the State of New York, in that: as the owner of ASAP 2, an enrolled transportation provider in the New York State Medical Assistance Program ("Medicaid"), acting in concert with others known and unknown, Defendant knowingly submitted and caused to be submitted, with the intent to defraud, claims for payment to Medicaid that falsely represented ASAP 2's full compliance with all applicable law, rules, and regulations of the Medicaid program for medical

transportation services. These claims were false and invalid because the claimed transportation services were never provided, not provided as claimed, or they were predicated on unlawful kickback payments to at least seven Medicaid recipients whose names are known to your Deponent. Relying on those false claims, Medicaid, through its fiscal agent, paid ASAP 2 and the defendant in excess of \$50,000 to which the defendant and ASAP 2 were not entitled.

Dated: Ithaca, New York  
June 18, 2025

LETITIA JAMES  
New York State Attorney General  
By:

  
\_\_\_\_\_  
William Gargan  
Special Assistant Attorney General