

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----	X	
THE PEOPLE OF THE STATE OF NEW YORK	X	
	X	INDICTMENT NO. 1106/2026
-against-	X	SEP 03 2026
	X	
X 1. MIGUEL BARON,	X	IND-73445-26/001-
CR-020455-26QN	X	005
X 2. GUARDIOLA PHARMACY, INC.,	X	
CR-020458-26QN	X	
X 3. BARON PHARMACY, INC.,	X	
d/b/a BARON SPECIALTY PHARMACY,	X	
CR-020457-26QN	X	
X 4. PRIME HOME ENTERPRISE, LLC, and	X	
CR-020456-26QN	X	
X 5. BAR&CA, LLC,	X	
	X	
Defendants.	X	
-----	X	

COUNT 1 GRAND LARCENY IN THE FIRST DEGREE, PENAL LAW § 155.42, (Defendants 1 and 2)

COUNT 2 GRAND LARCENY IN THE FIRST DEGREE, PENAL LAW § 155.42, (Defendants 1 and 3)

COUNT 3 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25, (Defendants 1 and 2)

COUNT 4 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25, (Defendants 1 and 2)

COUNT 5 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25, (Defendants 1 and 2)

COUNT 6 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25, (Defendants 1 and 2)

COUNT 7 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25, (Defendants 1 and 2)

COUNT 8 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25, (Defendants 1 and 2)

COUNT 9 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25, (Defendants 1 and 2)

COUNT 10 HEALTH CARE FRAUD IN THE SECOND DEGREE, PENAL LAW § 177.20,
(Defendants 1 and 2)

COUNT 11 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25,
(Defendants 1 and 3)

COUNT 12 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25,
(Defendants 1 and 3)

COUNT 13 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25,
(Defendants 1 and 3)

COUNT 14 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25,
(Defendants 1 and 3)

COUNT 15 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25,
(Defendants 1 and 3)

COUNT 16 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25,
(Defendants 1 and 3)

COUNT 17 HEALTH CARE FRAUD IN THE FIRST DEGREE, PENAL LAW § 177.25,
(Defendants 1 and 3)

COUNT 18 HEALTH CARE FRAUD IN THE SECOND DEGREE, PENAL LAW § 177.20,
(Defendants 1 and 3)

COUNT 19 MONEY LAUNDERING IN THE FIRST DEGREE, PENAL LAW §
470.20(1)(b)(ii)(A) & (iii), (Defendants 1 and 2)

COUNT 20 MONEY LAUNDERING IN THE FIRST DEGREE, PENAL LAW §
470.20(1)(b)(ii)(A) & (iii), (Defendants 1 and 3)

COUNT 21 MONEY LAUNDERING IN THE FIRST DEGREE, PENAL LAW §
470.20(1)(b)(ii)(A) & (iii), (Defendants 1 and 4)

COUNT 22 MONEY LAUNDERING IN THE SECOND DEGREE, PENAL LAW §
470.15(1)(b)(ii)(A) & (iii), (Defendants 1 and 5)

COUNT 23 MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES,
SOCIAL SERVICES LAW § 366-d(2)(b)(ii),
(Defendants 1 and 2)

COUNT 24 MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES,
SOCIAL SERVICES LAW § 366-d(2)(b)(ii),
(Defendants 1 and 3)

A TRUE BILL



GRAND JURY FOREPERSON

LETITIA JAMES
ATTORNEY GENERAL
STATE OF NEW YORK
Medicaid Fraud Control Unit
28 Liberty St., 13th Floor
New York, NY 10005

Dated: September 3, 2026
Queens, New York

COUNT ONE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC. of the crime GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law §155.42, committed as follows:

From on or about and between January 1, 2023 and April 29, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and others known and unknown, stole property from the New York State Medical Assistance program ("Medicaid"), and the value of said property exceeded one million dollars (\$1,000,000.00).

COUNT TWO

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law § 155.42, committed as follows:

From on or about and between January 1, 2023 and March 12, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and others known and unknown, stole property from the New York State Medical Assistance program ("Medicaid"), and the value of said property exceeded one million dollars (\$1,000,000.00).

COUNT THREE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2023 and December 31, 2023, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT FOUR

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2023 and December 31, 2023, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and

unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT FIVE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2024 and December 31, 2024, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT SIX

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2024 and December 31, 2024, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT SEVEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2025 and December 31, 2025, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and

unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT EIGHT

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2025 and December 31, 2025, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT NINE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2026 and March 12, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT TEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime HEALTH CARE FRAUD IN THE SECOND DEGREE, in violation of Penal Law § 177.20, committed as follows:

From on or about and between January 1, 2026 and March 12, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and

unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding fifty thousand dollars (\$50,000.00) in the aggregate.

COUNT ELEVEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2023 and December 31, 2023, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT TWELVE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2023 and December 31, 2023, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT THIRTEEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2024 and December 31, 2024, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high

managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., and BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT FOURTEEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2024 and December 31, 2024, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT FIFTEEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2025 and December 31, 2025, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT SIXTEEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2025 and December 31, 2025, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high

managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT SEVENTEEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE FIRST DEGREE, in violation of Penal Law § 177.25, committed as follows:

From on or about and between January 1, 2026 and March 12, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the New York State Medical Assistance program ("Medicaid"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from Medicaid for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from Medicaid, in a period of not more than one year, exceeding one million dollars (\$1,000,000.00) in the aggregate.

COUNT EIGHTEEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime HEALTH CARE FRAUD IN THE SECOND DEGREE, in violation of Penal Law § 177.20, committed as follows:

From on or about and between January 1, 2026 and March 12, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, with intent to defraud the AIDS Drug Assistance Program ("ADAP"), a health plan, knowingly and willfully provided materially false information and omitted material information for the purpose of requesting payment from ADAP for a health care item and service, and as a result of such false information and omission the Defendants wrongfully received payment or a portion of the payment, as the case may be, from ADAP, in a period of not more than one year, exceeding fifty thousand dollars (\$50,000.00) in the aggregate.

COUNT NINETEEN

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC., of the crime MONEY LAUNDERING IN THE FIRST DEGREE, in violation of Penal Law § 470.20(1)(b)(ii)(A) and (iii), committed as follows:

From on or about and between January 1, 2023 and July 10, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial

agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and others known and unknown, knowing that property involved in one or more financial transactions represented the proceeds of a class B or C felony, namely Grand Larceny in the First Degree (Count One) and Health Care Fraud in the First and Second Degrees (Counts Three through Ten), they conducted one or more financial transactions, which in fact involved the proceeds of any such felony, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of specified criminal conduct; and the total value of the property involved in such financial transaction or transactions exceeded one million dollars (\$1,000,000.00).

COUNT TWENTY

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC., d/b/a BARON SPECIALTY PHARMACY, of the crime MONEY LAUNDERING IN THE FIRST DEGREE, in violation of Penal Law § 470.20(1)(b)(ii)(A) and (iii), committed as follows:

From on or about and between January 1, 2023 and July 10, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and others known and unknown, knowing that property involved in one or more financial transactions represented the proceeds of a class B or C felony, namely Grand Larceny in the First Degree (Count Two) and Health Care Fraud in the First and Second Degrees (Counts Eleven through Eighteen), they conducted one or more financial transactions, which in fact involved the proceeds of any such felony, knowing that

the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of specified criminal conduct; and the total value of the property involved in such financial transaction or transactions exceeded one million dollars (\$1,000,000.00).

COUNT TWENTY-ONE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and PRIME HOME ENTERPRISE, LLC, of the crime MONEY LAUNDERING IN THE FIRST DEGREE, in violation of Penal Law § 470.20(1)(b)(ii)(A) and (iii), committed as follows:

From on or about and between January 1, 2023 and July 10, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting in behalf of corporate defendant PRIME HOME ENTERPRISE, LLC, acting in concert with each other and others known and unknown, knowing that property involved in one or more financial transactions represented the proceeds of a class B or C felony, namely Grand Larceny in the First Degree (Counts One and Two) and Health Care Fraud in the First and Second Degrees (Counts Three through Eighteen), they conducted one or more financial transactions, which in fact involved the proceeds of any such felony, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of specified criminal conduct; and the total value of the property involved in such financial transaction or transactions exceeded one million dollars (\$1,000,000.00).

COUNT TWENTY-TWO

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BAR&CA, LLC, of the crime MONEY LAUNDERING IN THE SECOND DEGREE, in violation of Penal Law § 470.15(1)(b)(ii)(A) and (iii), committed as follows:

From on or about and between January 1, 2023 and July 10, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting in behalf of corporate defendant BAR&CA, LLC, acting in concert with each other and others known and unknown, knowing that property involved in one or more financial transactions represented the proceeds of specified criminal conduct, namely Grand Larceny in the First Degree (Counts One and Two) and Health Care Fraud in the First and Second Degrees (Counts Three through Eighteen), they conducted one or more financial transactions, which in fact involved the proceeds of specified criminal conduct, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of specified criminal conduct; and the total value of the property involved in such financial transaction or transactions exceeded one hundred thousand dollars (\$100,000.00).

COUNT TWENTY-THREE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and GUARDIOLA PHARMACY, INC. of the crime MEDICAL ASSISTANCE PROVIDER, PROHIBITED PRACTICES, in violation of Social Services Law § 366-d(2)(b)(ii), committed as follows:

From on or about and between January 1, 2023 and March 12, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant GUARDIOLA PHARMACY, INC., acting in concert with each other and with others known and unknown, each being a medical assistance provider, offered, agreed to give and gave payment and other consideration to another person to the extent such payment and other consideration was given for the referral of services for which payment was made under Title eleven of Article Five of the Social Services Law and thereby obtained money and property having a value in excess of seven thousand five hundred dollars (\$7,500).

COUNT TWENTY-FOUR

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses MIGUEL BARON and BARON PHARMACY, INC. of the crime MEDICAL ASSISTANCE PROVIDER, PROHIBITED PRACTICES, in violation of Social Services Law § 366-d(2)(b)(ii), committed as follows:

From on or about and between January 1, 2023 and March 12, 2026, in the County of QUEENS and elsewhere in the State of New York, MIGUEL BARON, individually and as a high managerial agent acting within the scope of his employment and in behalf of corporate defendant BARON PHARMACY, INC., acting in concert with each other and with others known and unknown, each being a medical assistance provider, offered, agreed to give and gave payment and other consideration to another person to the extent such payment and other consideration was given for the referral of services for which payment was made under Title eleven of Article Five of the

Social Services Law and thereby obtained money and property having a value in excess of seven thousand five hundred dollars (\$7,500).

LETITIA JAMES
ATTORNEY GENERAL