

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

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THE PEOPLE OF THE STATE OF NEW YORK

FELONY COMPLAINT
Docket No.

-against-

SULEMAN NASIMI D/O/B 05/08/1980
4 Liberty Avenue
Hicksville, New York 11801
Defendant.

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STATE OF NEW YORK)
) ss.:
COUNTY OF QUEENS)

Detective Robert Hatt, Shield Number 2369, of the Office of the New York State Attorney General's Medicaid Fraud Control Unit ("MFCU"), 300 Motor Parkway, Hauppauge, New York, being duly sworn, deposes and says the following:

That from on or about and between January 1, 2020, and August 31, 2024, at 61-07 Utopia Parkway, Fresh Meadows, Queens County, New York 11365, and elsewhere in the State of New York, acting in concert with, and as a high managerial agent of, Tooth Fresh Meadows Dental, PLLC ("Tooth Fresh Meadows"), a dental practice, and others known and unknown, the defendant, Suleman Nasimi ("Defendant Nasimi"), and others known and unknown, committed the crimes of:

Penal Law § 155.40 (1) Grand Larceny in the Second Degree
 (class C felony) (1 count)

Penal Law § 177.20 Health Care Fraud in the Second Degree
 (class C felony) (2 counts)

Penal Law § 177.15 Health Care Fraud in the Third Degree
 (class D felony) (2 counts)

Penal Law § 175.35 (1) Offering a False Instrument for Filing in the First Degree
 (class E Felony) (35 counts)

IN THAT DEFENDANT NASIMI, individually and as an owner and high managerial agent acting within the scope of his ownership and in behalf of Tooth Fresh Meadows, acting in concert with others known and unknown: (1) with intent to deprive another of property and to appropriate the same to themselves and to a third person, did wrongfully take, obtain and withhold such

property valued in excess of fifty thousand dollars (\$50,000.00); (2) on one or more occasions, 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 single health plan for a health care item and service and, as a result of such information or omission, they or another person received payment exceeding fifty thousand dollars (\$50,000.00) in the aggregate, from a single health plan, in a period of not more than one year, to which they or such other person were not entitled under the circumstances; (3) on one or more occasions, 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 single health plan for a health care item and service and, as a result of such information or omission, they or another person received payment exceeding ten thousand dollars (\$10,000.00) in the aggregate, from a single health plan, in a period of not more than one year, to which they or such other person were not entitled under the circumstances; and, (4) with intent to defraud the state and a political subdivision thereof, knowing that a written instrument contained false statements and false information, offered and presented it to a public office and public servant with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office and public servant.

These offenses were committed under the following circumstances:

Defendant Nasimi, Individually and as a High Managerial Agent of Tooth Fresh Meadows, Stole Over \$50,000 for Dental Procedures that Never Occurred

At all times relevant to the charges, Defendant Nasimi was a dentist licensed by the New York State Education Department and the sole owner and high managerial agent of Tooth Fresh Meadows, and an enrolled provider in the New York State Medical Assistance Program ("Medicaid"). As the sole dentist, owner, and high managerial agent of Tooth Fresh Meadows, Defendant Nasimi was responsible for ensuring that Tooth Fresh Meadows conformed with all applicable laws and regulations for the operation of a dental practice in the state of New York. As an enrolled Medicaid provider, to be paid for services with Medicaid funds, Defendant and Tooth Fresh Meadows were authorized to submit claims for reimbursement to Medicaid for services provided to Medicaid recipients, either directly or through state-contracted Medicaid-funded Managed Care Organizations ("MCOs").

Defendant Nasimi, individually and acting in concert with and as a high managerial agent of Tooth Fresh Meadows, acting in concert with others known and unknown, engaged in a scheme constituting a systematic ongoing course of conduct with the intent to defraud Medicaid in that he submitted and caused to be submitted false claims for reimbursement to Medicaid for dental procedures that he knew he never provided, including claims during periods when he was outside the country traveling in London, France, and Greece. In reliance on the false claims submitted by Defendant Nasimi, Medicaid paid Defendant Nasimi and Tooth Fresh Meadows approximately \$381,543 to which neither were entitled. As a consequence of Defendant Nasimi's fraudulent claims, certain Medicaid recipients, known to Deponent, were unable to obtain necessary dental care from other providers, because Medicaid had already paid Defendant Nasimi for those procedures.

Health Care Fraud

Relying on the accuracy of the fraudulent claims, Medicaid, either directly or through MCOs, paid Defendant Nasimi and Tooth Fresh Meadows the following amounts, listed chronologically, to which Defendant Nasimi knew neither he nor Tooth Fresh Meadows were entitled:

1. From on or about and between October 24, 2020, and October 23, 2021, Tooth Fresh Meadows received in excess of ten thousand dollars (\$10,000.00) in the aggregate from Medicaid and Medicaid-funded MCOs to which neither Defendant Nasimi nor Tooth Fresh Meadows were entitled;
2. From on or about and between November 20, 2021, and November 19, 2022, Tooth Fresh Meadows received in excess of fifty thousand dollars (\$50,000.00) in the aggregate from Medicaid and Medicaid-funded MCOs to which neither Defendant Nasimi nor Tooth Fresh Meadows were entitled;
3. From on or about and between November 20, 2022, and November 19, 2023, Tooth Fresh Meadows received in excess of fifty thousand dollars (\$50,000.00) in the aggregate from Medicaid and Medicaid-funded MCOs to which neither Defendant Nasimi nor Tooth Fresh Meadows were entitled; and,
4. From on or about and between November 25, 2023, and January 20, 2024, Tooth Fresh Meadows received in excess of ten thousand dollars (\$10,000.00) in the aggregate from Medicaid and Medicaid-funded MCOs to which neither Defendant Nasimi nor Tooth Fresh Meadows were entitled.

Offering a False Instrument for Filing

On or about and between January 1, 2020, and August 31, 2024, Defendant Nasimi, individually and acting in concert with and as a high managerial agent of Tooth Fresh Meadows, acting in concert with others known and unknown, knowingly submitted and caused to be submitted, either directly or through MCOs, false claims for reimbursement to Medicaid for the following Medicaid recipients whose full names and identities are known to your Deponent and for whom corresponding claims for payment are identified by unique Transaction Control Numbers ("TCN"), as follows:

- Medicaid Recipient #1
 - 8/24/2021
 - TCN: 202225526674600
- Medicaid Recipient #2
 - 9/23/2021
 - TCN: 202127010097500

- Medicaid Recipient #3
 - 2/10/2022
 - TCN: 202204920141700
- Medicaid Recipient #4
 - 3/24/2022
 - TCN: 202208723617100
- Medicaid Recipient #5
 - 4/9/2022
 - TCN: 202210826173600
- Medicaid Recipient #6
 - 5/6/2022
 - TCN: 202213626093000
- Medicaid Recipient #7
 - 5/6/2022
 - TCN: 202212926415200
- Medicaid Recipient #8
 - 5/9/2022
 - TCN: 202213623523000
- Medicaid Recipient #9
 - 6/24/2022
 - TCN: 202217926092200
- Medicaid Recipient #10
 - 6/24/2022
 - TCN: 202217926092000
- Medicaid Recipient #11
 - 6/30/2022
 - TCN: 202218623386700
- Medicaid Recipient #12
 - 7/11/2022
 - TCN: 202221323768900
- Medicaid Recipient #13
 - 7/11/2022
 - TCN: 202221326306500

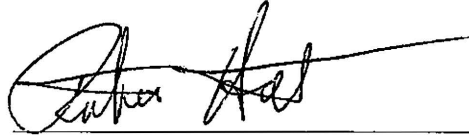
- **Medicaid Recipient #14**
 - 7/11/2022
 - TCN: 202221326303700
- **Medicaid Recipient #15**
 - 7/11/2022
 - TCN: 202221323788900
- **Medicaid Recipient #16**
 - 7/11/2022
 - TCN: 202221323788400
- **Medicaid Recipient #17**
 - 7/18/2022
 - TCN: 202221326531400
- **Medicaid Recipient #18**
 - 7/21/2022
 - TCN: 202221326730500
- **Medicaid Recipient #19**
 - 7/21/2022
 - TCN: 202221326531700
- **Medicaid Recipient #20**
 - 9/1/2022
 - TCN: 202224926227900
- **Medicaid Recipient #21**
 - 9/6/2022
 - TCN: 202225526674600
- **Medicaid Recipient #22**
 - 9/8/2022
 - TCN: 202225720038300
- **Medicaid Recipient #23**
 - 9/22/2022
 - TCN: 202226920335400
- **Medicaid Recipient #24**
 - 9/22/2022
 - TCN: 202226920334200

- Medicaid Recipient #25
 - 10/10/2022
 - TCN: 202229020117300
- Medicaid Recipient #26
 - 11/16/2022
 - TCN: 202232523836700
- Medicaid Recipient #27
 - 1/5/2023
 - TCN: 202301120152500
- Medicaid Recipient #28
 - 1/30/2023
 - TCN: 202303920385100
- Medicaid Recipient #29
 - 3/2/2023
 - TCN: 202306526488300
- Medicaid Recipient #30
 - 3/21/2023
 - TCN: 202308623351400
- Medicaid Recipient #31
 - 5/11/2023
 - TCN: 202315023192100
- Medicaid Recipient #32
 - 6/13/2023
 - TCN: 202317123628500
- Medicaid Recipient #33
 - 6/20/2023
 - TCN: 202317726354700
- Medicaid Recipient #34
 - 9/7/2023
 - TCN: 202325426102900

- Medicaid Recipient #35
 - 11/30/2023
 - TCN: 202334626100700

False statements made in this Complaint are punishable as a class A misdemeanor under New York State Penal Law § 210.45.

Date: September 25, 2026
Queens, New York

A handwritten signature in black ink, appearing to read "Robert Hatt", written over a horizontal line.

Detective Robert Hatt
Shield Number 2369

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

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THE PEOPLE OF THE STATE OF NEW YORK

FELONY COMPLAINT
Docket No.

-against-

TOOTH FRESH MEADOWS DENTAL, PLLC,
61-07 Utopia Parkway
Fresh Meadows, New York 11365

Defendant.

-----X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Detective Robert Hatt, Shield Number 2369, of the Office of the New York State Attorney General, Medicaid Fraud Control Unit ("MFCU"), 300 Motor Parkway, Hauppauge, New York, being duly sworn, deposes and says the following:

That from on or about and between January 1, 2020, and August 31, 2024, in the County of Queens and elsewhere in the State of New York, the defendant, Tooth Fresh Meadows Dental, PLLC ("Defendant Tooth Fresh Meadows"), a dental practice solely owned by Suleman Nasimi ("Nasimi"), located at 61-07 Utopia Parkway, Fresh Meadows, New York; and others known and unknown, committed the offenses of:

Penal Law § 155.40 (1) Grand Larceny in the Second Degree
 (class C felony) (1 count)

Penal Law § 177.20 Health Care Fraud in the Second Degree
 (class C felony) (2 counts)

Penal Law § 177.15 Health Care Fraud in the Third Degree
 (class D felony) (2 counts)

Penal Law § 175.35 (1) Offering a False Instrument for Filing in the First Degree
 (class E Felony) (35 counts)

IN THAT DEFENDANT TOOTH FRESH MEADOWS, by and through its high managerial agent, Nasimi, acting within the scope of his ownership and in behalf of Tooth Fresh Meadows, acting in concert with others known and unknown: (1) with intent to deprive another of property

and to appropriate the same to themselves and to a third person, did wrongfully take, obtain and withhold such property valued in excess of fifty thousand dollars (\$50,000.00); (2) on one or more occasions, 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 single health plan for a health care item and service and, as a result of such information or omission, they or another person received payment exceeding fifty thousand dollars (\$50,000.00) in the aggregate, from a single health plan, in a period of not more than one year, to which they or such other person were not entitled under the circumstances; (3) on one or more occasions, 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 single health plan for a health care item and service and, as a result of such information or omission, they or another person received payment exceeding ten thousand dollars (\$10,000.00) in the aggregate, from a single health plan, in a period of not more than one year, to which they or such other person were not entitled under the circumstances; and, (4) with intent to defraud the state and a political subdivision thereof, knowing that a written instrument contained false statements and false information, offered and presented it to a public office and public servant with the knowledge and belief that it would be filed with, registered and recorded in and otherwise become a part of the records of such public office and public servant.

This offense was committed under the following circumstances:

**Defendant Tooth Fresh Meadows, By and Through its High Managerial Agent Nasimi,
Stole Over \$50,000 for Dental Procedures that Never Occurred**

At all times relevant to the charges, Defendant Tooth Fresh Meadows was solely owned by its high managerial agent Nasimi, a dentist licensed by the New York State Education Department and an enrolled provider in the New York State Medical Assistance Program ("Medicaid"). As the sole dentist, owner, and high managerial agent of Defendant Tooth Fresh Meadows, Nasimi was responsible for ensuring that Defendant Tooth Fresh Meadows conformed with all applicable laws and regulations for the operation of a dental practice in the state of New York. As an enrolled Medicaid provider, to be paid for services with Medicaid funds, Defendant and Nasimi were authorized to submit claims for reimbursement to Medicaid for services provided to Medicaid recipients, either directly or through state-contracted Medicaid-funded Managed Care Organizations ("MCOs").

Nasimi, individually and acting in concert with and as a high managerial agent of Defendant Tooth Fresh Meadows, acting in concert with others known and unknown, engaged in a scheme constituting a systematic ongoing course of conduct with the intent to defraud Medicaid in that he submitted and caused to be submitted false claims for reimbursement to Medicaid for dental procedures that he knew he never provided, including claims during periods when he was outside the country traveling in London, France, and Greece. In reliance on the false claims submitted by Nasimi and on behalf of Defendant Tooth Fresh Meadows, Medicaid paid Nasimi and Defendant Tooth Fresh Meadows approximately \$381,543 to which neither were entitled. As a consequence of Defendant Tooth Fresh Meadows and Nasimi's fraudulent claims, certain Medicaid recipients,

known to Deponent, were unable to obtain necessary dental care from other providers, because Medicaid had already paid Defendant Tooth Fresh Meadows and Nasimi for those procedures.

Health Care Fraud

Relying on the accuracy of the fraudulent claims, Medicaid, either directly or through MCOs, paid Nasimi and Defendant Tooth Fresh Meadows the following amounts, listed chronologically, to which Nasimi knew neither he nor Defendant Tooth Fresh Meadows were entitled;

1. From on or about and between October 24, 2020, and October 23, 2021, Defendant Tooth Fresh Meadows received in excess of ten thousand dollars (\$10,000.00) in the aggregate from Medicaid and Medicaid-funded MCOs to which neither Nasimi nor Defendant Tooth Fresh Meadows were entitled;
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Date: September 25, 2026

Queens, New York

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Detective Robert Hatt
Shield Number 2369