

STATE OF NEW YORK
COUNTY OF ORANGE

ORANGE COUNTY COURT
2024 JUN 27 PM 3: 32

PEOPLE OF THE STATE OF NEW YORK,

INDICTMENT

– against –

Indictment No.: 24-237

1. DYD UNIVERSE INC.,
2. DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN
3. DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, and a/k/a DAVE
4. NIGINA ISKANDAROVA

Defendants.

COUNTS

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

COUNT 2 HEALTH CARE FRAUD IN THE SECOND DEGREE, PL § 177.20
(Defendants 1, 2, and 3)

COUNT 3 HEALTH CARE FRAUD IN THE SECOND DEGREE, PL § 177.20
(Defendants 1, 2, and 3)

COUNT 4 MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES,
Social Services Law § 366-d(2)(b)(ii), (4)
(Defendants 1, 2, 3, and 4)

COUNT 5 MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES,
Social Services Law § 366-d(2)(b)(ii), (4)
(Defendants 1, 2, 3, and 4)

COUNT 6 MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES,
Social Services Law § 366-d(2)(b)(ii), (4)
(Defendants 1, 2, 3, and 4)


COUNT 7 MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES,
Social Services Law § 366-d(2)(b)(ii), (4)
(Defendants 1, 2, 3, and 4)

COUNT 8 MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES,
Social Services Law § 366-d(2)(b)(ii), (4)
(Defendants 1, 2, and 3)

- COUNT 9** OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PL § 175.35(1)
(Defendants 1, 2, and 3)
- COUNT 10** OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PL § 175.35(1)
(Defendants 1, 2, and 3)
- COUNT 11** OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PL § 175.35(1)
(Defendants 1, 2, and 3)
- COUNT 12** OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PL § 175.35(1)
(Defendants 1, 2, and 3)
- COUNT 13** OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PL § 175.35(1)
(Defendants 1, 2, and 3)
- COUNT 14** OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE,
PL § 175.35(1)
(Defendants 1, 2, and 3)

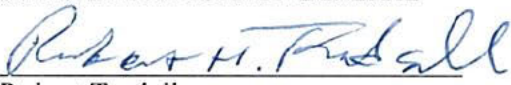
A TRUE BILL

Dated: June 27, 2024



Grand Jury Foreperson
Orange County Courthouse
285 Main Street
Goshen, New York 12180

LETITIA JAMES
NEW YORK STATE ATTORNEY GENERAL

By: 
Robert Trudell
Special Assistant Attorney General
New York State Attorney General
Medicaid Fraud Control Unit
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COUNT ONE

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law § 155.42, committed as follows:

On, or about and between, April 18, 2018 to March 20, 2023, in the County of Orange and elsewhere in the State of New York, Defendants DALER YULDASHEV and DAMIR YULDASHEV, individually and as high managerial agents, acting within the scope of their employment with and in behalf of corporate Defendant DYD UNIVERSE, INC., each acting in concert with each other and others known and unknown to the grand jury, stole property and the total value of the property exceeded one million dollars (\$1,000,000), *to wit*: on said dates and locations, Defendants DALER YULDASHEV and DAMIR YULDASHEV, individually and by directing employees of corporate Defendant DYD UNIVERSE, INC. who were under their supervision, pursuant to a single ongoing intent, knowingly submitted and caused to be submitted to the New York State Medical Assistance Program ("Medicaid"), claims for reimbursement for transportation services that falsely represented Defendant DYD UNIVERSE, INC.'s full compliance with all applicable laws, rules and regulations of Medicaid when, in fact, those claims were invalid for reimbursement due to the payment of unlawful kickbacks to Medicaid recipients, false representations that the transportation services were provided at all or as claimed, and false representations that claimed toll amounts were incurred. In reliance on the Defendants' false

claims, Medicaid, through its fiscal agent, paid DYD UNIVERSE INC. in excess of one million dollars (\$1,000,000) to which it was not entitled.

COUNT TWO

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter “DALER YULDASHEV”) and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter “DAMIR YULDASHEV”) of **HEALTH CARE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §177.20, committed as follows:

On or about and between January 3, 2022 to December 26, 2022, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment with and in behalf of corporate Defendant DYD UNIVERSE, INC., each acting in concert with each other and others known and unknown to the Grand Jury, with intent to defraud a single health plan, that is Medicaid, 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 or service and, as a result of such information and omission, received payment or a portion of the payment, as the case may be, from a single health plan, that is Medicaid, in a period of not more than one year, exceeding fifty thousand dollars (\$50,000) in the aggregate, which they were not entitled under the circumstances, *to wit*: on said dates and locations, DALER YULDASHEV and DAMIR YULDASHEV, individually and by directing employees of corporate Defendant DYD UNIVERSE INC. who were under their supervision, pursuant to a single ongoing intent, knowingly submitted and caused to be submitted to Medicaid, on more than one occasion,

claims for reimbursement for transportation services that falsely represented and omitted DYD UNIVERSE, INC.'s full compliance with all applicable laws, rules and regulations of Medicaid when, in fact, those claims were invalid for reimbursement due to the payment of unlawful kickbacks to Medicaid recipients, false representations that the transportation services were provided at all or as claimed, and false representations that claimed toll amounts were incurred. As a result of such information and omissions, corporate Defendant DYD UNIVERSE, INC., wrongfully received from Medicaid, through Medicaid's fiscal agent, in excess of fifty thousand dollars (\$50,000) in the aggregate, to which it was not entitled under the circumstances.

COUNT THREE

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") of **HEALTH CARE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §177.20, committed as follows:

On or about and between January 3, 2023 to March 20, 2023, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment with and in behalf of corporate Defendant DYD UNIVERSE, INC., each acting in concert with each other and others known and unknown to the Grand Jury, with intent to defraud a single health plan, that is Medicaid, 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 or service and, as a result of such information and omission, received

payment or a portion of the payment, as the case may be, from a single health plan, that is Medicaid, in a period of not more than one year, exceeding fifty thousand dollars (\$50,000) in the aggregate, which they were not entitled under the circumstances, *to wit*: on said dates and locations, DALER YULDASHEV and DAMIR YULDASHEV, individually and by directing employees of corporate Defendant DYD UNIVERSE INC. who were under their supervision, pursuant to a single ongoing intent, knowingly submitted and caused to be submitted to the New York State Medical Assistance Program (“Medicaid”), on more than one occasion, claims for reimbursement for transportation services that falsely represented and omitted DYD UNIVERSE, INC.’s full compliance with all applicable laws, rules and regulations of Medicaid when, in fact, those claims were invalid for reimbursement due to the payment of unlawful kickbacks to Medicaid recipients, false representations that the transportation services were provided at all or as claimed, and false representations that claimed toll amounts were incurred. As a result of such information and omissions, corporate Defendant DYD UNIVERSE, INC., wrongfully received from Medicaid, through Medicaid’s fiscal agent, in excess of fifty thousand dollars (\$50,000) in the aggregate, to which it was not entitled under the circumstances.

COUNT FOUR

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter “DALER YULDASHEV”) and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter “DAMIR YULDASHEV”) and NIGINA ISKANDAROVA of **MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES (KICKBACKS)** in violation of Social Services Law § 366-d(2)(b)(ii), (4) committed as follows:

That on or about and between December 23, 2020 and March 20, 2023, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV, DAMIR YULDASHEV, and NIGINA ISKANDAROVA, individually and as high managerial agents acting within the scope of their employment and in behalf of corporate Defendant DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, each being a medical assistance provider, offered, agreed to give and gave payment and other consideration in any form to another person to the extent such payment and other consideration was given to purchase, lease and order any good, facility, service or item for which payment was made under Title Eleven of Article Five of the Social Services Law and thereby obtained money or property having a value in excess of Seven Thousand Five Hundred Dollars (\$7,500), *to wit*: on said dates and locations, Defendants paid and caused others in Defendants' control to pay J.B., a Medicaid recipient whose full name is known to the Grand Jury, to order taxi services from DYD UNIVERSE INC., an enrolled Medicaid provider, and, as a result, Defendants received in excess of Seven Thousand Five Hundred Dollars (\$7,500) paid under Title Eleven of Article Five of the Social Services Law.

COUNT FIVE

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") and NIGINA ISKANDAROVA of **MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES (KICKBACKS)** in violation of Social Services Law § 366-d(2)(b)(ii), (4) committed as follows:

That on or about and between, September 17, 2020 and March 20, 2023, in the County of Orange and elsewhere in the State of New York, Defendants DALER YULDASHEV, DAMIR YULDASHEV, and NIGINA ISKANDAROVA, individually and as high managerial agents acting within the scope of their employment with and in behalf of corporate Defendant DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, each being a medical assistance provider, offered, agreed to give and gave payment and other consideration in any form to another person to the extent such payment and other consideration was given to purchase, lease and order any good, facility, service or item for which payment was made under Title Eleven of Article Five of the Social Services Law and thereby obtained money or property having a value in excess of Seven Thousand Five Hundred Dollars (\$7,500), *to wit*: on said dates and locations, Defendants paid and caused others in Defendants' control to pay A.S., a Medicaid recipient whose full name is known to the Grand Jury, to order taxi services from DYD UNIVERSE INC., an enrolled Medicaid provider, and, as a result, Defendants received in excess of Seven Thousand Five Hundred Dollars (\$7,500) paid under Title Eleven of Article Five of the Social Services Law.

COUNT SIX

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") and NIGINA ISKANDAROVA of **MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES (KICKBACKS)** in violation of Social Services Law § 366-d(2)(b)(ii), (4) committed as follows:

That between, on or about, September 8, 2020 and March 20, 2023, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV, DAMIR YULDASHEV, and NIGINA ISKANDAROVA, individually and as high managerial agents acting within the scope of their employment with and in behalf of corporate Defendant DYD UNIVERSE INC. each acting in concert with each other and others known and unknown to the Grand Jury, each being a medical assistance provider, offered, agreed to give and gave payment and other consideration in any form to another person to the extent such payment and other consideration was given to purchase, lease and order any good, facility, service or item for which payment was made under Title Eleven of Article Five of the Social Services Law and thereby obtained money or property having a value in excess of Seven Thousand Five Hundred Dollars (\$7,500), *to wit*: on said dates and locations, Defendants paid and caused others in Defendants' control to pay S.O., a Medicaid recipient whose full name is known to the Grand Jury, to order taxi services from DYD UNIVERSE INC., an enrolled Medicaid provider, and, as a result, Defendants received in excess of Seven Thousand Five Hundred Dollars (\$7,500) paid under Title Eleven of Article Five of the Social Services Law.

COUNT SEVEN

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") and NIGINA ISKANDAROVA of **MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES (KICKBACKS)** in violation of Social Services Law § 366-d(2)(b)(ii), (4) committed as follows:

That on or about and between, September 9, 2020 and March 20, 2023, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV, DAMIR YULDASHEV, and NIGINA ISKANDAROVA, individually and as high managerial agents acting within the scope of their employment with and in behalf of corporate Defendant DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, each being a medical assistance provider, offered, agreed to give and gave payment and other consideration in any form to another person to the extent such payment and other consideration was given to purchase, lease and order any good, facility, service or item for which payment was made under Title Eleven of Article Five of the Social Services Law and thereby obtained money or property having a value in excess of Seven Thousand Five Hundred Dollars (\$7,500), *to wit*: on said dates and locations, Defendants paid and caused others in Defendants' control to pay M.G., a Medicaid recipient whose full name is known to the Grand Jury, to order taxi services from DYD UNIVERSE INC., an enrolled Medicaid provider, and, as a result, Defendants received in excess of Seven Thousand Five Hundred Dollars (\$7,500) paid under Title Eleven of Article Five of the Social Services Law.

COUNT EIGHT

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") of **MEDICAL ASSISTANCE PROVIDER; PROHIBITED PRACTICES (KICKBACKS)** in violation of Social Services Law § 366-d(2)(b)(ii), (4) committed as follows:

That on or about and between, May 25, 2018 and August 19, 2019, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment with and in behalf of corporate Defendant DYD UNIVERSE INC. each acting in concert with each other and others known and unknown to the Grand Jury, each being a medical assistance provider, offered, agreed to give and gave payment and other consideration in any form to another person to the extent such payment and other consideration was given to purchase, lease and order any good, facility, service or item for which payment was made under Title Eleven of Article Five of the Social Services Law and thereby obtained money or property having a value in excess of Seven Thousand Five Hundred Dollars (\$7,500), *to wit*: on said dates and locations, Defendants paid and caused others in Defendants' control to pay L.P., a Medicaid recipient whose full name is known to the Grand Jury, to order taxi services from DYD UNIVERSE INC., an enrolled Medicaid provider, and, as a result, Defendants received in excess of Seven Thousand Five Hundred Dollars (\$7,500) paid under Title Eleven of Article Five of the Social Services Law.

COUNT NINE

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law §175.35 (1), committed as follows:

That on or about October 16, 2020 in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV and DAMIR YULDASHEV, individually and as

high managerial agents acting within the scope of their employment and in behalf of corporate Defendant, DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, knowing that a written instrument contained a false statement and false information, with intent to defraud the State of New York, offered and presented the written instrument to a public office or public servant with the knowledge or belief that it would be filed with, registered, or recorded in or otherwise become a part of the records of such public office or public servant, *to wit*: a trip attestation submitted to Medical Answering Services, an agent of the New York State Medical Assistance Program, with assigned prior approval number 41163734625.

COUNT TEN

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter “DALER YULDASHEV”) and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter “DAMIR YULDASHEV”) of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law §175.35 (1), committed as follows:

That on or about October 20, 2020, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV, and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment and in behalf of corporate Defendant, DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, knowing that a written instrument contained a false statement and false information, with intent to defraud the State of New York, offered and presented the written instrument to a public office or public servant with the knowledge or belief that it would be filed with, registered, or recorded in or otherwise become a part of the records of such public office or

public servant, *to wit*: a claim for payment, submitted to GDIT, a fiscal agent of the New York State Medical Assistance Program, through the eMedNY system, with assigned TCN 2029400107312530.

COUNT ELEVEN

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, D Y D UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law §175.35 (1), committed as follows:

That on or about July 6, 2021, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment and in behalf of corporate Defendant, D Y D UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, knowing that a written instrument contained a false statement and false information, with intent to defraud the State of New York, offered and presented the written instrument to a public office or public servant with the knowledge or belief that it would be filed with, registered, or recorded in or otherwise become a part of the records of such public office or public servant, *to wit*: a trip attestation submitted to Medical Answering Services, an agent of the New York State Medical Assistance Program, with assigned prior approval number 51171034030.

COUNT TWELVE

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, D Y D UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN

(hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law §175.35 (1), committed as follows:

That on or about July 13, 2021, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV, and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment and in behalf of corporate Defendant, DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, knowing that a written instrument contained a false statement and false information, with intent to defraud the State of New York, offered and presented the written instrument to a public office or public servant with the knowledge or belief that it would be filed with, registered, or recorded in or otherwise become a part of the records of such public office or public servant, *to wit*: a claim for payment, submitted to GDIT, a fiscal agent of the New York State Medical Assistance Program, through the eMedNY system, with assigned TCN 2119400238418830.

COUNT THIRTEEN

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter "DALER YULDASHEV") and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter "DAMIR YULDASHEV") of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE** in violation of Penal Law § 175.35(1) committed as follows:

That on or about May 2, 2022. in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment and in behalf of corporate Defendant, DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, knowing that a written instrument contained a false statement and false information, with intent to defraud the State of New York, offered and presented the written instrument to a public office or public servant with the knowledge or belief that it would be filed with, registered, or recorded in or otherwise become a part of the records of such public office or public servant, *to wit*: a trip attestation submitted to Medical Answering Services, an agent of the New York State Medical Assistance Program, with assigned prior approval number 61179697413.

COUNT FOURTEEN

The Grand Jury of the County of Orange, State of New York, by this Indictment, accuses the Defendants, DYD UNIVERSE INC., DALER YULDASHEV, a/k/a JOHNNIE, a/k/a JOHN (hereinafter “DALER YULDASHEV”) and DAMIR YULDASHEV, a/k/a RUSSIA, a/k/a DEMETRI, a/k/a DEMETRIUS, a/k/a DAVE (hereinafter “DAMIR YULDASHEV”) of **OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE**, in violation of Penal Law §175.35 (1), committed as follows:

That on or about May 10, 2022, in the County of Orange and elsewhere in the State of New York, Defendants, DALER YULDASHEV, and DAMIR YULDASHEV, individually and as high managerial agents acting within the scope of their employment and in behalf of corporate Defendant, DYD UNIVERSE INC., each acting in concert with each other and others known and unknown to the Grand Jury, knowing that a written instrument contained a false statement and false information, with intent to defraud the State of New York, offered and presented the written

instrument to a public office or public servant with the knowledge or belief that it would be filed with, registered, or recorded in or otherwise become a part of the records of such public office or public servant, *to wit*: a claim for payment, submitted to GDIT, a fiscal agent of the New York State Medical Assistance Program, through the eMedNY system, with assigned TCN 2213000234623530.