



TERRITORY OF THE VIRGIN ISLANDS )  
DIVISION OF ST. THOMAS AND ST. JOHN ) SS:

SUPERIOR COURT  
OF THE VIRGIN ISLANDS  
2008 AUG 22 AM 10: 08

AFFIDAVIT OF NICHOLAS PERU

I, Nicholas Peru, being duly sworn, depose and state the following:

1. I am employed by the Office of the Virgin Islands Inspector General as a Special Investigator and have been so employed for six years. I was also employed with the Department of Justice, Office of the Attorney General as a Special Agent from 1992 to 2002.
2. That, from October 2007, I have been investigating possible wrong doing by Rodney Earl Miller, Sr. (MILLER) who from May 2002 to November 2007 was the President and Chief Executive Officer of the Roy Lester Schneider Hospital ("RLSH").
3. That, affiant has reviewed the personnel file of MILLER maintained by the Government of the Virgin Islands, Division of Personnel and noted that under the caption of "VETERAN PREFERENCE INFORMATION (PLEASE PRINT)", in response to the question: "What was your discharge?" MILLER checked the box for "Honorable or General" although there was a box for "Dishonorable" and a box for "Not Applicable".

AFFIDAVIT OF NICHOLAS PERU

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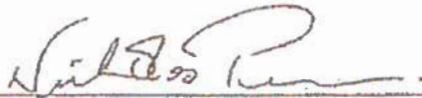
4. That, as part of the investigation, on March 27, 2008, a criminal check was conducted on MILLER through the National Crime Information Center (NCIC), a national database containing criminal records of individuals arrested on criminal violations. This data base is administered by the Federal Bureau of Investigation (FBI).
5. That, the NCIC came back with a positive match for MILLER as being arrested on March 22, 1994.
6. That, at the time of his arrest, MILLER was enlisted in the United States Navy.
7. That, affiant contacted the Naval Criminal Investigative Services (NCIS) and requested confirmation of the criminal charges of MILLER. I was informed that on September 13, 1995, MILLER appeared before a General Court Martial and entered guilty pleas to his charges, which included Larceny and Obstruction of Justice.
8. That, by letter dated July 17, 2008, I was provided with the NCIS file containing ninety six (96) pages.
9. That, among other penalties, MILLER received a bad conduct discharge.

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10. That, MILLER never disclosed to any Board Member of the RLSH his criminal history nor his bad conduct discharge.
11. Based on the foregoing, affiant believes that sufficient probable cause exists to issue a Warrant of Arrest for RODNEY EARL MILLER, SR. and charge him with Fraudulent Claims upon the Government in violation of T 14 VIC § 843 (3).

FURTHER AFFIANT SAYETH NOT



NICHOLAS PERU, SPECIAL INVESTIGATOR

Subscribed and Sworn to before me this 5 day of August, 2008.

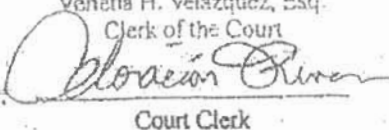
CERTIFIED A TRUE COPY

Date:

08/05/2008

Venetia H. Velazquez, Esq.  
Clerk of the Court

By:

  
Court Clerk  
Judge of the Superior Court of the Virgin Islands