

CLERK OF THE COURT

1 **INFM**  
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14 (I.A. 10/21/2013, 10:30 A.M.)

9 **DISTRICT COURT**  
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA, )  
12 )  
13 Plaintiff, )  
14 )  
15 v. )  
16 YOLANDA RODRIGUEZ, )  
17 aka YOLANDA RODRIGUEZ-FERNANDEZ )  
18 )  
19 Defendant. )

Case No.: C-13-293277-1  
Dept. No.: III

17 **INFORMATION**

18 The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO,  
19 Nevada Attorney General, and Andrew Schulke, Sup. Senior Deputy Attorney General,  
20 informs this Honorable Court that YOLANDA RODRIGUEZ aka YOLANDA RODRIGUEZ-  
21 FERNANDEZ, the Defendant above named, has committed the offense of Failure to Maintain  
22 Adequate Records, a gross misdemeanor violation of NRS 422.570(1), one (1) count, in Clark  
23 County, State of Nevada as follows:

24 **COUNT ONE**  
25 **FAILURE TO MAINTAIN ADEQUATE RECORDS**  
26 **[NRS 422.570(1) Gross Misdemeanor]**

27 Defendant, upon causing claims to be submitted or payment received pursuant to the  
28 Nevada State Medicaid plan, did knowingly and intentionally fail to maintain such records as  
are necessary to disclose fully the nature of the goods or services for which the claims were

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1 submitted or payment was received for at least 5 years after the date on which payment was  
2 received. The actions occurred as part of Defendant's routine business practices/scheme or  
3 continuous course of conduct, to wit:

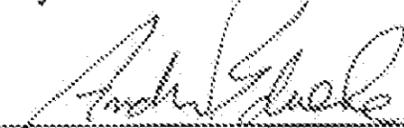
4 On or about November 2010 through September 2011, Defendant was employed as a  
5 personal care aide by High Class Personal Care (High Class). During times stated herein,  
6 High Class was located at 5000 W. Oakey Blvd. Suite E1, Las Vegas, Nevada. High Class  
7 assigned Medicaid recipient L.N. (Medicaid No. 32XXXXXX004) as a patient/client for  
8 Defendant to provide home care services. While so employed, Defendant did knowingly fail  
9 to maintain accurate documentation, including time and attendance documents concerning  
10 the home care actually provided to Medicaid recipient L.N. Defendant knew these records  
11 were used as a basis for claims submitted for reimbursement from Medicaid. Defendant  
12 subsequently received payment for such claimed services. Defendant intentionally failed to  
13 maintain accurate records that are necessary to fully disclose the nature of the service for  
14 those claims. Many of Defendant's records did not note accurate or true dates, times or  
15 length of services provided.

16 All of which was committed in the County of Clark, and constitutes a gross  
17 misdemeanor violation of NRS 422.570(1).

18 All of which is contrary to the form, force and effect of the statutes in such cases  
19 made and provided, and against the peace and dignity of the State of Nevada. Furthermore,  
20 complainant makes this declaration subject to the penalty of perjury.

21 Dated this 11<sup>th</sup> day of October, 2013.

22 CATHERINE CORTEZ MASTO  
23 Attorney General

24 By:   
25 ANDREW SCHULKE  
26 Sup. Senior Deputy Attorney General  
27 Medicaid Fraud Control Unit  
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