

FILED

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JUL 1 9 51 AM '13

JUSTICE COURT
LAS VEGAS, NEVADA

BY _____ DEPUTY

8 IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP

9 CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,)

11 Plaintiff,)

12 vs.)

13 NIURVIS RODRIGUEZ,)

14 ID No. 3077375)

15 Defendant.)

CASE NO.: 13M17550X

DEPT NO.: 1

16 CRIMINAL COMPLAINT

17 The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO,
18 Nevada Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,
19 under penalty of perjury, and within his knowledge, information and belief, complains and
20 charges that NIURVIS RODRIGUEZ, an individual and responsible person, pursuant to NRS
21 422.530, and a provider of health care services in Clark County, Nevada, at the times stated
22 herein, with having committed the offenses of: Submitting False Claims, a misdemeanor
23 violation of NRS 422.540(1) and NRS 422.540(2)(b), one (1) count. Said offense committed
24 in regard to the State of Nevada, Department of Health & Human Services, Health Care
25 Financing and Policy Division—Nevada Medicaid (hereinafter Medicaid) in the following
26 manner:

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COUNT ONE
SUBMITTING FALSE CLAIMS
(NRS 422.540(1) and NRS 422.540(2)(b) Misdemeanor)

Defendant, through a scheme or continuous course of conduct, intentionally caused claims to be made for payment from Medicaid that Defendant knew were false, to wit:

On or about February 2011 through September 2011, Defendant was employed as a personal care aide by High Class Personal Care (High Class). During times stated herein, High Class was located at 5000 W. Oakey Blvd. Suite E1, Las Vegas, Nevada. High Class assigned Medicaid recipient N.D. (Medicaid No. 00XXXXXX577) as a patient/client for Defendant to provide home care services. While so employed, Defendant did knowingly create/write fictitious documentation, including time and attendance documents concerning the home care actually provided to Medicaid recipient N.D. Defendant intentionally provided the fraudulent documentation to High Class knowing it would be used to generate false bills/claims submitted for reimbursement from Medicaid. The documentation was false as many of Defendant's records did not note the actual dates, times, or services provided to the Medicaid patient/client.

All of which was committed in Clark County, aggregating an amount less than \$650.00, and constitutes a misdemeanor in violation of NRS 422.540.

All of which is contrary to the form, force and effect of the statutes in such cases and provided and against the peace and dignity of the State of Nevada.

Said Complainant therefore requests that a Summons-in-Lieu of arrest be issued in order that the Defendant, NIURVIS RODRIGUEZ, may be dealt with according to the laws of the State of Nevada. Said complainant makes this declaration subject to the penalty of perjury.

Dated this 21st day of JUNE, 2013.

CATHERINE CORTEZ MASTO
Attorney General

By: 
Andrew Schulke
Sup. Senior Deputy Attorney General