



CLERK OF THE COURT

1 **INFM**
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14 (I.A. 08/12/2014, 9:30 A.M.)

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

10 STATE OF NEVADA,)
11) Plaintiff,) Case No.: C14-299570-1
12) v.) Dept. No.: 18
13) SOLANGE PHILLIPS,)
14) Defendant.)

15 _____)
16 **INFORMATION**

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 informs this Honorable Court that SOLANGE PHILLIPS, the Defendant above named, has
20 committed the offense of FAILURE TO MAINTAIN ADEQUATE RECORDS, a gross
21 misdemeanor violation of NRS 422.570(1), one (1) count, in Clark County, State of Nevada as
22 follows:

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

26 Defendant, upon causing claims to be submitted or payment received pursuant to the
27 Nevada State Medicaid plan, did knowingly and intentionally fail to maintain such records as
28 are necessary to disclose fully the nature of the goods or services for which the claims were
submitted or payment was received for at least 5 years after the date on which payment was

1 received. The actions occurred as part of Defendant's routine business practices/scheme or
2 continuous course of conduct, to wit:

3 On or about September 2012 through May 2013, Defendant was employed as a
4 service provider by Nevada Behavioral Solutions, LLC (NBS). During times stated herein,
5 NBS was located at 6889 S. Eastern Ave., Las Vegas, Nevada inside Clark County. While
6 employed at NBS, Defendant allegedly provided Basic Skills Training (BST) services to
7 Medicaid recipients D.E. (Medicaid No. 00XXXXXX976) and A.J. (Medicaid No.
8 86XXXXXX010). While so employed, Defendant did knowingly fail to maintain accurate
9 documentation, including time and attendance documents, concerning the BST services
10 provided to Medicaid recipients D.E. and A.J. Defendant knew these records were used as a
11 basis for claims submitted for reimbursement from Medicaid. Defendant subsequently
12 received payment for such claimed services. Defendant intentionally failed to maintain
13 accurate records that are necessary to fully disclose the nature of the service for those claims.
14 Many of Defendant's records did not note accurate or true dates, times or length of services
15 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 made
19 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 22nd day of July, 2014.

22 CATHERINE CORTEZ MASTO
23 Attorney General

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