



CLERK OF THE COURT

1 AINF
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8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 OLUWOLE ADEGBORUWA,

14 Defendant.

Case No.: C-12-281167-1

Dept. No.: XXI

15
16 AMENDED INFORMATION

17 The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO,
18 Nevada Attorney General, and Matthew L. Jensen, Senior Deputy Attorney General, hereby
19 informs the Court that OLUWOLE ADEGBORUWA, the above-named Defendant, has
20 committed the criminal offenses of Submitting False Medicaid Claims, a Category D Felony
21 violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) count; Theft, a Category B
22 Felony violation of NRS 205.0832(1)(c) and NRS 205.0835(4), one (1) count; Intentional
23 Failure to Maintain Records, a Gross Misdemeanor violation of NRS 422.570(1), one (1)
24 count; and Obtaining and Using the Personal Identifying Information of Another Person for
25 Unlawful Purposes, a Category B Felony violation of NRS 205.463(1) and NRS 205.463(3),
26 one (1) count, within Clark County, State of Nevada as follows:

27 From on or about October 2008 through December 2009, Defendant maintained an
28 agreement with Medicaid to be a provider of services or goods and operated a business

1 known as Flotsol, Inc. d/b/a Flotsol Inc. Medical Supplies ("Flotsol") with its principal location
2 at 7390 W. Sahara Ave., Ste 230, Las Vegas, Nevada.

3 **COUNT 1**
4 **SUBMITTING FALSE MEDICAID CLAIMS**
5 **NRS 422.540(1)(a) and NRS 422.540(2)(a)**
6 **Felony, Category D**

7 Defendant, through a scheme or continuous course of conduct, with intent to defraud,
8 intentionally caused claims to be made for payment from Medicaid that defendant knew were
9 false, to wit:

10 While operating Flotsol during the above mentioned dates, Defendant submitted
11 several claims to Medicaid for reimbursement under the Medicaid numbers of several
12 Medicaid recipients. Defendant, through these claims, represented that he had provided
13 certain durable medical equipment to B.F. (Medicaid No. 56-----001), D.H. (Medicaid No. 44--
14 ----001), G.M. (Medicaid No. 33-----001), M.B. (Medicaid No. 45-----002), M.La. (Medicaid
15 No. 56-----001), M.D. Medicaid No. 76-----001) and/or B.W. (Medicaid No. 00-----523).
16 Defendant's claims to Medicaid asserted that certain medical supplies were provided to the
17 aforementioned Medicaid recipients and requested reimbursement for such provision of
18 medical supplies. Instead, the aforementioned Medicaid recipients did not receive the certain
19 medical supplies from Defendant, or through Flotsol, that Defendant claimed to have
20 delivered.

21 All of which was committed in the County of Clark, aggregating an amount in excess of
22 \$650.00, and constitutes a category D felony in violation of NRS 422.540.

23 **COUNT 2**
24 **THEFT**
25 **NRS 205.0832(1)(c) and 205.0835(4)**
26 **Felony, Category B**

27 Defendant did without lawful authority and through a scheme or continuous course of
28 conduct, knowingly obtain personal property of another by a material misrepresentation with
the intent to deprive the person of the property, to wit:

While operating Flotsol during the above mentioned dates, Defendant submitted

1 several claims to Medicaid for reimbursement under the Medicaid numbers of several
2 Medicaid recipients. Defendant, through these claims, represented that he had provided
3 certain durable medical equipment to B.F. (Medicaid No. 56-----001), D.H. (Medicaid No. 44--
4 ----001), G.M. (Medicaid No. 33-----001), M.B. (Medicaid No. 45-----002), M.La. (Medicaid
5 No. 56-----001), M.D. Medicaid No. 76-----001) and/or B.W. (Medicaid No. 00-----523).
6 Defendant's claims to Medicaid asserted that certain medical supplies were provided to the
7 aforementioned Medicaid recipients and requested reimbursement for such provision of
8 medical supplies. Instead, the aforementioned Medicaid recipients did not receive the certain
9 medical supplies from Defendant, or through Flotsol, that Defendant claimed to have
10 delivered.

11 Defendant received remuneration by communication of these material
12 misrepresentations to Medicaid in excess of \$3,500.00.

13 All of which was committed in the County of Clark, and constitutes a category B felony
14 in violation of NRS 205.0832(1)(c) and 205.0835(4).

15 **COUNT 3**
16 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
17 **NRS 422.570(1)**
18 **Gross Misdemeanor**

19 Defendant, upon causing claims to be submitted or payment received pursuant to the
20 Nevada State Medicaid plan, did intentionally fail to maintain such records as are necessary
21 to disclose fully the nature of the goods or services for which the claims were submitted or
22 payment was received for at least 5 years after the date on which payment was received.
23 The actions occurred as part of Defendant's routine business practices/scheme or continuous
24 course of conduct, to wit:

25 While operating Flotsol during the above mentioned dates, Defendant submitted
26 several claims to Medicaid for reimbursement under the Medicaid numbers of several
27 Medicaid recipients. Defendant, through these claims, represented that he had provided
28 certain durable medical equipment to B.F. (Medicaid No. 56-----001), D.H. (Medicaid No. 44--
----001), G.M. (Medicaid No. 33-----001), M.B. (Medicaid No. 45-----002), M.La. (Medicaid

1 No. 56-----001), M.D. Medicaid No. 76-----001) and/or B.W. (Medicaid No. 00-----523).

2 Regarding the aforementioned Medicaid recipients, Defendant did knowingly fail to
3 maintain accurate documentation, including delivery records and claims documents,
4 concerning the medical supplies actually provided to these Medicaid recipients. Defendant
5 knew these records were used as a basis for claims submitted for reimbursement from
6 Medicaid. Flotsol subsequently received payment for such claimed services. Defendant
7 intentionally failed to maintain accurate records that are necessary to fully disclose the nature
8 of the service for those claims. Many of defendant's records did not note accurate or true
9 types and/or quantities of supplies provided or accurate or true dates of delivery of supplies
10 (dates of service).

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

13 **COUNT 4**
14 **OBTAINING AND USING THE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
15 **PERSON FOR UNLAWFUL PURPOSES**
16 **NRS 205.463(1) and NRS 205.463(3)**
17 **Felony, Category B**

18 Defendant did knowingly, willfully and unlawfully obtain personal identifying information
19 of another person; and with the intent to commit an unlawful act, used the personal identifying
20 information for an unlawful purpose, including, without limitation, to obtain credit, a good, a
21 service or anything of value in the name of that other person. Furthermore, Defendant did so
22 by obtaining and using the personal identifying information of five or more persons, to wit:

23 While operating Flotsol during the above mentioned dates, Defendant submitted
24 several claims to Medicaid for reimbursement under the Medicaid account numbers of several
25 Medicaid recipients. Defendant, through these claims, represented that he had provided
26 certain durable medical equipment to B.F. (Medicaid No. 56-----001), D.H. (Medicaid No. 44--
27 ----001), G.M. (Medicaid No. 33-----001), M.B. (Medicaid No. 45-----002), M.La. (Medicaid
28 No. 56-----001), M.D. Medicaid No. 76-----001) and/or B.W. (Medicaid No. 00-----523).
Defendant's claims to Medicaid asserted that certain medical supplies were provided to the
aforementioned Medicaid recipients and requested reimbursement for such provision of

1 medical supplies. Instead, the aforementioned Medicaid recipients did not receive the certain
2 medical supplies from Defendant, or through Flotsol, that Defendant claimed to have
3 delivered.

4 Defendant used the personal identifying information in order to, and did, unlawfully
5 obtain remuneration from Medicaid in the name of the aforementioned Medicaid recipients.

6 All of which was committed in the County of Clark, and constitutes a category B felony
7 violation of NRS 205.463(1) and 205.463(3).

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

11
12 DATED this 12th day of DECEMBER 2013.

13 CATHERINE CORTEZ MASTO
14 Attorney General

15 By: 
16 Matthew L. Jensen
17 Sr. Deputy Attorney General
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on the 12th day of December 2013, I served the foregoing **AMENDED INFORMATION** by depositing a true and correct copy of said document for mailing, first-class U.S. mail, postage prepaid, at Las Vegas, Nevada or via facsimile addressed as follows:

Dean Y. Kajioka, Esq.
8530 W. Charleston Blvd., Ste. 100
Las Vegas, NV 89117
Fax (702) 366-1653


Employee of the Attorney General's Office

Attorney General's Office
555 E. Washington, Suite 3800
Las Vegas, NV 89101

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CATHERINE CORTEZ MASTO
Attorney General

KEITH G. ALVARO
Assistant Attorney General
GREGORY M. SMITH
Chief of Staff

FAX TRANSMITTAL MEMORANDUM

TO: Dean Y. Kajjoka, Esq. DATE: 12/12/2013
FAX #: 702-368-1653
FROM: Patricia McCoy PHONE (702) 486-3760
Legal Secretary II
Medicaid Fraud Control Unit
pmccoy2@ag.nv.gov
SUBJECT: State of Nevada v. Oluwole Adegboruwa, C-12-281187-1

REMARKS: Order and Amended Information attached and filed today.

This fax consists of 8 pages, including this cover sheet.

If you have any difficulties with this transmission, please telephone the sender at the above-referenced phone number. Thank you.

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