



CLERK OF THE COURT

1 **INFM**  
2 **ADAM PAUL LAXALT**  
3 Attorney General  
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13 Attorneys for State of Nevada  
14 (I.A. 05/08/17, 10:00 A.M.)

15 **DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 **THE STATE OF NEVADA,**

18 Plaintiff,

19 vs.

20 **TONYA MARTIN-LOWE,**

21 Defendant.

Case No. C17-322924-1

Dept. No. XII

22 **INFORMATION**

23 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada  
24 Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,  
25 informs this Honorable Court that TONYA MARTIN-LOWE, the Defendant above named,  
26 has committed the offense of: **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**  
27 **RECORDS**, a gross misdemeanor violation of NRS 422.570(1), one (1) count, in Clark  
28 County, State of Nevada, as follows:

**COUNT I**

**INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
**(NRS 422.570(1), Gross Misdemeanor)**

Defendant, upon causing claims to be submitted or payment received pursuant to  
the Nevada State Medicaid plan, did intentionally fail to maintain such records as 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

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

3 From on about July 2014 and October 2014, Because We Care, LLC (BWC), located  
4 in Las Vegas, Nevada, submitted claims to Medicaid for reimbursement for services  
5 allegedly provided by Defendant to a Medicaid recipient. Defendant intentionally failed to  
6 maintain accurate documentation, including progress notes, concerning the services  
7 actually provided to the Medicaid recipient. Defendant created documentation asserting  
8 that certain services were provided to a Medicaid recipient, but such services were not  
9 actually provided. Many of Defendant's records did not note accurate or true dates or types  
10 of services purportedly provided to the Medicaid recipient.

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

14 DATED this 4<sup>th</sup> day of May, 2017.

15 ADAM PAUL LAXALT  
16 Attorney General

17 By:   
18 Andrew Schulke (Bar. No. 10218)  
19 Sup. Senior Deputy Attorney General  
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