

1 **INFM**  
ADAM PAUL LAXALT  
2 Attorney General  
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8 Attorneys for State of Nevada  
(I.A. 09/04/18, 10:00 A.M.)

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

11 **THE STATE OF NEVADA,**  
12 **Plaintiff,**

Case No. C-18-334365-1  
Dept. No. XXIX

13 vs.

14 **MIKISHA RENEE TODD,**  
I.D. No. 1858498,  
15 **Defendant.**

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17 **INFORMATION**

18 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada  
19 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this  
20 Honorable Court that MIKISHA RENEE TODD, the Defendant above named, has  
21 committed the offense of INTENTIONAL FAILURE TO MAINTAIN ADEQUATE  
22 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**  
**INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
25 **[NRS 422.570(1) Gross Misdemeanor]**

26 Defendant upon submitting a claim for or upon receiving payment for goods or  
27 services pursuant to Medicaid, intentionally failed to maintain such records, for at least 5  
28 years after the date on which payment was received, as are necessary to disclose fully the


1 nature of the goods or services for which the claims were submitted or payment received,  
2 to wit:

3 From about October 24, 2016 through March 21, 2017, in Clark County, Nevada, US  
4 National Personal Care, LLC ("US National") submitted claims to Medicaid for payment of  
5 Personal Care services Defendant purportedly provided to Medicaid recipient D.L.  
6 (Medicaid ID 0000xxxxxx800). Defendant did not actually provide these services, yet she  
7 signed time sheets falsely stating she did. Accordingly, for those claims, Defendant  
8 intentionally failed to maintain accurate or true records as are necessary to disclose fully  
9 the nature of services for which US National relied on for its submission of claims to  
10 Medicaid.

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 24<sup>th</sup> day of August, 2018.

15 ADAM PAUL LAXALT  
16 Attorney General

17 By:   
18 STEVEN SIDHU (Bar. No. 7516)  
19 Senior Deputy Attorney General  
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