

1 **INFM**
2 **ADAM PAUL LAXALT**
3 Attorney General
4 Andrew Schulke (Bar. No. 10218)
5 Sup. Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 555 East Washington Avenue #3900
9 Las Vegas, NV 89101
10 (702) 486-3420 (phone)
11 (702) 486-3768 (fax)
12 ASchulke@ag.ng.gov

13 Attorneys for State of Nevada
14 (I.A. 01/07/2019, 10:00 A.M.)

15 **DISTRICT COURT**
16 **CLARK COUNTY, NEVADA**

17 **THE STATE OF NEVADA,**
18 **Plaintiff,**

19 Case No. C18-337106-1

20 vs.

21 Dept. No. 17

22 **MOVING FORWARD COUNSELING**
23 **SOLUTIONS, LLC,**
24 **Defendant.**

25 **CRIMINAL INFORMATION**

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

29 Count I
30 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
31 **[NRS 422.570(1), Gross Misdemeanor]**

32 Defendant, upon causing claims to be submitted or payment received pursuant to
33 the Nevada State Medicaid plan, did intentionally fail to maintain such records as are
34 necessary to disclose fully the nature of the goods or services for which the claims were

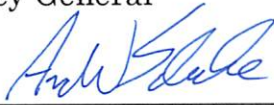
1 submitted or payment was received for at least 5 years after the date on which payment
2 was received. The actions occurred as part of Defendant's routine business
3 practices/scheme or continuous course of conduct, to wit:

4 From on or about January 2016 to December 2016, Moving Forward Counseling
5 Solutions, LLC (Moving Forward), located in Clark County, Nevada, submitted claims to
6 Medicaid for reimbursement for services allegedly provided by Defendant Moving Forward
7 to Medicaid recipients. Defendant Moving Forward intentionally failed to maintain
8 accurate documentation, including progress notes, concerning the services actually
9 provided to the Medicaid recipients. Many of Defendant Moving Forward's records did not
10 note accurate or true dates or types of services purportedly provided to Medicaid recipients.

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 2nd day of January, 2019.

15 ADAM PAUL LAXALT
16 Attorney General

17 By: 
18 ANDREW SCHULKE (Bar. No. 10218)
19 Sup. Senior Deputy Attorney General
20
21
22
23
24
25
26
27
28