



1 **INFM**  
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14 (I.A. 02/25/2019, 10:00 A.M.)

15 **DISTRICT COURT**

16 **CLARK COUNTY, STATE OF NEVADA**

17 **THE STATE OF NEVADA,**

18 Plaintiff,

19 vs.

20 **FELECIA BLUNTSON,**  
21 I.D. No. 2623980

22 Defendant.

23 Case No. C-19-338156-1

24 Dept. No. XIX

25 **INFORMATION**

26 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada  
27 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this  
28 Honorable Court that FELECIA BLUNTSON, 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 ONE**  
30 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
31 **[NRS 422.570(1) Gross Misdemeanor]**

32 Defendant upon submitting a claim for or upon receiving payment for goods or  
33 services pursuant to Medicaid, intentionally failed to maintain such records, for at least 5  
34 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 May 29, 2016 through September 10, 2016, in Clark County, Nevada,  
4 ISU, Inc. d/b/a Triple C Personal Care Agency (“Triple C”) submitted claims to Medicaid  
5 for payment of Personal Care Services that Defendant purportedly provided to Medicaid  
6 recipient A.H. (Medicaid ID 0000xxxxxx237). Defendant did not actually provide these  
7 services because A.H. was incarcerated from May 18, 2016 until at least November 30,  
8 2016, in the custody of Nevada Department of Corrections, yet Defendant signed time  
9 sheets falsely stating she did. Accordingly, for those claims, Defendant intentionally failed  
10 to maintain accurate or true records as are necessary to disclose fully the nature of services  
11 for which Triple C relied on for its submission of claims to Medicaid

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

15 DATED this 15<sup>th</sup> day of February, 2019.

16 AARON D. FORD  
17 Attorney General

18 By: /s/ Steven Sidhu  
19 STEVEN SIDHU (Bar. No. 7516)  
20 Senior Deputy Attorney General  
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