



1 **INFM**
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13 Attorneys for State of Nevada
14 (I.A. 07/31/2019, 10:00 A.M.)

15 **DISTRICT COURT**

16 **CLARK COUNTY, STATE OF NEVADA**

17 **THE STATE OF NEVADA,**

18 Plaintiff,

19 vs.

20 **BETTY A. WILLIAMS,**

21 Defendant.

Case No. C19-341972-1

Dept. No. XXI

22 **INFORMATION**

23 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
24 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
25 Honorable Court that BETTY A WILLIAMS, the Defendant above named, has committed
26 the offense of: **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**, a
27 gross misdemeanor violation of NRS 422.570, one (1) count, in Clark County, State of
28 Nevada, as follows:

COUNT I

**INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS
[NRS 422.570, Gross Misdemeanor]**

Defendant, through a scheme or continuous course of conduct, without lawful
authority, upon submitting a claim for or upon receiving payment for goods or services
pursuant to Medicaid, intentionally failed to maintain such records, for at least 5 years

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1 after the date on which payment was received, as are necessary to disclose fully the nature
2 of the goods or services for which the claims were submitted or payment received, to wit:

3 Defendant intentionally failed to maintain accurate documentation concerning the
4 services or quantities of services actually provided to Medicaid recipients. Defendant knew
5 these records were used as a basis for claims submitted for reimbursement from Medicaid.
6 Defendant subsequently obtained payment for such claimed services.

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

10 DATED this **25th** day of **July**, 2019.

11 AARON D. FORD
12 Attorney General

13 By: /s/ Steven Sidhu
14 STEVEN SIDHU (Bar. No. 7516)
15 Senior Deputy Attorney General
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