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7	Attorneys for State of Nevada	
8	JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP	
9	CLARK COUNTY, STATE OF NEVADA	
10	THE STATE OF NEVADA,	Case No. 19FN2579X
11	Plaintiff,	Dept. No.
12	vs.	Dept. No.
13	BRANDY LATOYA WILLIAMS aka BRANDY LATOYA MITCHELL,	
14	I.D. #1936521,	19CRN00 2441
15	Defendant.	
15 16		COMPLAINT
0050000	CRIMINAL	COMPLAINT gh legal counsel, AARON D. FORD, Nevada
16	CRIMINAL The State of Nevada, by and through	
16 17	CRIMINAL The State of Nevada, by and through	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General,
16 17 18	CRIMINAL The State of Nevada, by and through Attorney General, and BEHNAZ F. SAl complains and declares, upon information, by	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General,
16 17 18 19	CRIMINAL The State of Nevada, by and through Attorney General, and BEHNAZ F. SAl complains and declares, upon information, by BRANDY LATOYA WILLIAMS aka	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General, pelief and/or personal knowledge that:
16 17 18 19 20	CRIMINAL The State of Nevada, by and throug Attorney General, and BEHNAZ F. SAl complains and declares, upon information, b BRANDY LATOYA WILLIAMS aka named defendant, through Busy Bee Beha	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General, belief and/or personal knowledge that: BRANDY LATOYA MITCHELL, the above-
16 17 18 19 20 21	CRIMINAL The State of Nevada, by and through Attorney General, and BEHNAZ F. SAI complains and declares, upon information, by BRANDY LATOYA WILLIAMS akan named defendant, through Busy Bee Behaves Township, County of Clark, State of	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General, belief and/or personal knowledge that: BRANDY LATOYA MITCHELL, the above- vioral Health LLC (Busy Bee), in North Las
16 17 18 19 20 21 22	CRIMINAL The State of Nevada, by and through Attorney General, and BEHNAZ F. SAll complains and declares, upon information, be BRANDY LATOYA WILLIAMS akan named defendant, through Busy Bee Behaves Township, County of Clark, State of count of SUBMITTING FALSE CLAIMS:	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General, belief and/or personal knowledge that: BRANDY LATOYA MITCHELL, the above-vioral Health LLC (Busy Bee), in North Last Nevada, committed the offense(s) of: one (1)
16 17 18 19 20 21 22 23	CRIMINAL The State of Nevada, by and through Attorney General, and BEHNAZ F. SAll complains and declares, upon information, be BRANDY LATOYA WILLIAMS akan named defendant, through Busy Bee Behaves Township, County of Clark, State of count of SUBMITTING FALSE CLAIMS: violation of NRS 422.540(1)(a) and NRS 42	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General, belief and/or personal knowledge that: BRANDY LATOYA MITCHELL, the above-vioral Health LLC (Busy Bee), in North Las Nevada, committed the offense(s) of: one (1) MEDICAID FRAUD, a category D felony in
16 17 18 19 20 21 22 23 24	CRIMINAL The State of Nevada, by and through Attorney General, and BEHNAZ F. SAll complains and declares, upon information, by BRANDY LATOYA WILLIAMS akan named defendant, through Busy Bee Behaved Vegas Township, County of Clark, State of count of SUBMITTING FALSE CLAIMS: violation of NRS 422.540(1)(a) and NRS 422.541 FAILURE TO MAINTAIN ADEQUATE 1	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General, belief and/or personal knowledge that: BRANDY LATOYA MITCHELL, the above-vioral Health LLC (Busy Bee), in North Lase Nevada, committed the offense(s) of: one (1) MEDICAID FRAUD, a category D felony in (2.540(2)(a); one (1) count of INTENTIONAL
16 17 18 19 20 21 22 23 24 25	CRIMINAL The State of Nevada, by and through Attorney General, and BEHNAZ F. SAll complains and declares, upon information, be BRANDY LATOYA WILLIAMS akan named defendant, through Busy Bee Behaves Township, County of Clark, State of count of SUBMITTING FALSE CLAIMS: violation of NRS 422.540(1)(a) and NRS 42 FAILURE TO MAINTAIN ADEQUATE In of NRS 422.570(1); and one (1) count of Taxonia and State of Submitted States and States are submitted.	gh legal counsel, AARON D. FORD, Nevada LIMIAN, Senior Deputy Attorney General, belief and/or personal knowledge that: BRANDY LATOYA MITCHELL, the above-vioral Health LLC (Busy Bee), in North Last Nevada, committed the offense(s) of: one (1) MEDICAID FRAUD, a category D felony in (2.540(2)(a); one (1) count of INTENTIONAL RECORDS, a gross misdemeanor in violation

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III

Defendant committed said offenses against the State of Nevada, Department of Health & Human Services, Health Care Financing and Policy Division – Nevada Medicaid (Medicaid) in the following manner:

From on or about January 4, 2015, to February 25, 2017, Busy Bee maintained an agreement with Medicaid to be a provider of services. At all times pertinent to these allegations, Busy Bee maintained business locations at 4345 Corporate Center Drive, Suite 204, North Las Vegas, Nevada 89030, and 6649 North McCarran Street, North Las Vegas, Nevada 89086, both of which were located in Clark County. During said time, Defendant was the sole owner responsible for billing and submitting all claims to Medicaid on behalf of Busy Bee and had the requisite authority or responsibility pursuant to NRS 422.530.

SUBMITTING FALSE CLAIMS: MEDICAID FRAUD Category D felony – NRS 422.540(1)(a) and NRS 422.540(2)(a)

Defendant, pursuant to a scheme or continuing course of conduct and with the intent to defraud, made or caused to be made false claims for payment from Medicaid that Defendant knew were false, to wit:

From on or about January 4, 2015, to February 25, 2017, Defendant, through Busy Bee, did knowingly submit false claims to Medicaid concerning the Rehabilitative Mental Health (RMH) services allegedly provided to Medicaid recipients in order to receive payment from Medicaid for those services. The service providers denied providing the type and/or quantity of services on behalf of Busy Bee to the Medicaid recipients, and the Medicaid recipients who purportedly received services from these providers on behalf of Busy Bee denied receiving said type and/or quantity of services for which Busy Bee billed Medicaid.

All of which was committed in Clark County, aggregating an amount greater than \$650, and constitutes a category D felony in violation of NRS 422.540.

COUNT II

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

Defendant, upon submitting a claim for or upon receiving payment for goods or services pursuant to the State Plan for 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 claim was submitted or payment was received for at least five (5) years after the date on which payment was received. The actions occurred as part of Defendant's routine business practices/scheme or continuing course of conduct, to wit:

From on or about January 4, 2015, to February 25, 2017, Defendant, through Busy Bee, intentionally failed to maintain accurate documentation, including progress notes and service documentation, concerning the services and/or quantity of services actually provided to Medicaid recipients. Defendant knew these records were used as a basis for claims submitted for reimbursement from Medicaid. Defendant subsequently obtained payment for such claimed services.

All of which was committed in Clark County and constitutes a gross misdemeanor in violation of NRS 422.570(1).

COUNT III

THEFT IN THE AMOUNT OF \$3,500 OR MORE Category B Felony – NRS 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(4)

Defendant did, without lawful authority and pursuant to a scheme or continuing course of conduct, knowingly obtain personal property of another person by a material misrepresentation with intent to deprive that person of the property, where the aggregate value of said property was \$3,500 or more, to wit:

From on or about January 4, 2015, to February 25, 2017, Defendant, through Busy Bee, knowingly and unlawfully made material misrepresentations to Medicaid concerning the services allegedly provided to Medicaid recipients with the intent to deprive Medicaid of payment for services that were not actually provided. Medicaid recipients and Medicaid service providers denied that services had been provided as listed on claims submitted to Medicaid for payment. Medicaid recipients did not receive nor did Medicaid service