



1 **INFM**  
2 AARON D. FORD  
3 Attorney General  
4 BEHNAZ SALIMIAN MOLINA (Bar. No. 13752)  
5 Senior Deputy Attorney General  
6 State of Nevada  
7 Office of the Attorney General  
8 5175 South Durango Drive  
9 Las Vegas, NV 89113  
10 (702) 486-3420 (phone)  
11 (702) 486-0460 (fax)  
12 BMolina@ag.nv.gov  
13 *Attorneys for State of Nevada*

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

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 LARRY LANCE CRAWFORD,  
14 I.D. #2791544,

15 Defendant.

Case No. C-21-355646-1

Dept. No. XXVIII

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada  
18 Attorney General, and BEHNAZ SALIMIAN MOLINA, Senior Deputy Attorney General,  
19 informs this Honorable Court that LARRY LANCE CRAWFORD, the defendant above  
20 named, has committed the offense of: one (1) count of **INTENTIONAL FAILURE TO**  
21 **MAINTAIN ADEQUATE RECORDS**, a gross misdemeanor in violation of NRS  
22 422.570(1), in Clark County, Nevada.

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

26 From on or about January 1, 2017, to on or about September 14, 2018, Dynamic  
27 Future maintained an agreement with Medicaid to be a provider of services. At all times  
28 pertinent to these allegations, Dynamic Future maintained a business location in Clark

1 County at 8670 West Cheyenne Avenue, Suite 120, Las Vegas, Nevada 89129. During said  
2 time, Defendant was the sole owner and operator of Dynamic Future and had the requisite  
3 authority and/or responsibility pursuant to NRS 422.530.

4 **COUNT I**  
5 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
6 **Gross Misdemeanor – NRS 422.570(1)**

7 Defendant, upon submitting a claim for or upon receiving payment for goods or  
8 services pursuant to the State Plan for Medicaid (Plan), did intentionally fail to maintain  
9 such records as are necessary to disclose fully the nature of the goods or services for which  
10 the claim was submitted or payment was received for at least five (5) years after the date  
11 on which payment was received. The actions occurred as part of Defendant’s routine  
12 business practices/scheme or continuing course of conduct, to wit:

13 From on or about January 1, 2017, to on or about September 14, 2018, Defendant,  
14 LARRY LANCE CRAWFORD, through Dynamic Future, intentionally failed to maintain  
15 accurate documentation, including progress notes and service documentation, concerning  
16 the services or quantity of services actually provided to Medicaid recipients. Defendant  
17 knew these records were used as a basis for claims submitted for reimbursement from  
18 Medicaid and that he was required to maintain these records. Defendant subsequently  
19 obtained payment for such claimed services.

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

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

25 DATED this **3rd** day of **May** 2021.

26 AARON D. FORD  
27 Attorney General

28 By: /s/ Behnaz Salimian Molina  
BEHNAZ SALIMIAN MOLINA (Bar. No. 13752)  
Senior Deputy Attorney General