



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

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 SHONNA NICOLE MARSHALL (a/k/a  
14 SHONNA NICOLE MCKNIGHT, a/k/a  
15 SHONNA NICOLE RODGERS,  
16 a/k/a SHONNA NICOLE HARPER,  
17 a/k/a SHONNA NICOLE NEWMAN),  
18 ID #0840613,

19 Defendant.

Case No. C-19-345595-2

Dept. No. I

18 **AMENDED INDICTMENT**

19 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada  
20 Attorney General, and BEHNAZ SALIMIAN MOLINA, Senior Deputy Attorney General,  
21 informs this Honorable Court that SHONNA NICOLE MARSHALL aka SHONNA  
22 NICOLE MCKNIGHT aka SHONNA NICOLE RODGERS aka SHONNA NICOLE  
23 HARPER aka SHONNA NICOLE NEWMAN, the defendant above named, has committed  
24 the offenses of: One (1) Count of **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**,  
25 a Category D Felony in violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), and Twenty-  
26 Six (26) Counts of **MONEY LAUNDERING**, a Category C Felony in violation of NRS  
27 207.195(2), in Clark County, Nevada.

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

4 From in or around August 2017 through in or around December 2017, Vegas Health  
5 LLC (Vegas Health) maintained an agreement with Medicaid to be a provider of services  
6 or goods. At all times pertinent to these allegations, Vegas Health maintained business  
7 locations at 5220 Green Vine Street, North Las Vegas, Nevada 89031, and 4933 West Craig  
8 Road, Suite 189, North Las Vegas, Nevada 89130, both of which are in Clark County.

9 From in or around October 2017 through in or around December 2017, Defendant  
10 **SHONNA NICOLE MARSHALL (MARSHALL)** was an agent and/or representative of  
11 Vegas Health authorized to act on Vegas Health’s behalf and had the requisite authority  
12 or responsibility pursuant to NRS 422.530. During said time, **MARSHALL** was an  
13 authorized agent and signatory on U.S. Bank Business Checking account ending in #8262,  
14 in the name of Vegas Health, and was authorized to act on behalf of Vegas Health. Said  
15 authority included the ability to open accounts, make deposits, and withdraw funds.

16 **COUNT 1**  
17 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**  
18 **Category D Felony – NRS 422.540(1)(a) and NRS 422.540(2)(a)**

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

22 From in or around October 2017 through in or around December 2017, Defendant  
23 **MARSHALL**, through Vegas Health and pursuant to a continuing course of conduct, made  
24 and/or caused false claims to be made to Medicaid for payment asserting that behavioral  
25 health services were provided to Medicaid recipients by various service providers when  
26 Defendant knew those services were never provided. Medicaid recipients under whose  
27 identities **MARSHALL**, through Vegas Health, submitted claims and/or caused the  
28 submission of claims included M.B. (Medicaid ID 000XXXXX750) and B.B. (Medicaid ID  
000XXXXX335). Service providers under whose Medicaid Provider ID numbers

1 **MARSHALL**, through Vegas Health, submitted claims and/or caused the submission of  
2 claims to Medicaid for payment included Dr. Saleha Baig, Maria Ellis, Jean Fajardo, Nancy  
3 Faye, Jeannie Gaye, Sara Hall, and Trent Hansen. Said service providers denied providing  
4 the services on behalf of Vegas Health and denied ever being employed by Vegas Health.  
5 Said Medicaid recipients who purportedly received services from these providers on behalf  
6 of Vegas Health denied receiving said services for which Vegas Health billed Medicaid and  
7 subsequently received payments.

8 As a result of Defendant's actions regarding submission of false claims to Medicaid,  
9 **MARSHALL** received a total of approximately \$1,161,684.32 from Medicaid. Said funds  
10 were deposited electronically into the Vegas Health Business Checking account ending in  
11 #8262 in or about December 2017.

12 All of which was committed in Clark County, aggregating an amount greater than  
13 \$650, and constitutes a category D felony in violation of NRS 422.540(2)(a).

14 **COUNTS 2-27**

15 **MONEY LAUNDERING**

16 **Category C Felony – NRS 207.195(2), NRS 207.195(4), and NRS 207.195(5)**

17 From in or about October 2017 through in or about August 2018, in Clark County,  
18 Nevada, Defendant **MARSHALL** did conduct or attempt to conduct financial transactions  
19 concerning any monetary instrument or other property that has a value of \$5,000 or more  
20 with the knowledge that the monetary instrument or other property was directly or  
21 indirectly derived from any unlawful activity, namely Medicaid Fraud, as fully alleged in  
22 Count 1 of this Amended Indictment, with each transaction constituting a separate  
violation, as follows:

COUNT	APPROXIMATE DATE	AMOUNT	DESCRIPTION
2	December 1, 2017	\$100,014.00	Counter withdrawal from Vegas Health U.S. Bank Business Checking account ending in #8262
3	December 1, 2017	\$50,000.00	Cashier's check issued to Just a Touch of Love Inc with purpose/remitter: Vegas Health LLC

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<b>COUNT</b>	<b>APPROXIMATE DATE</b>	<b>AMOUNT</b>	<b>DESCRIPTION</b>
4	December 1, 2017	\$50,000.00	Cashier's check issued to Nicoles Closet with purpose/remitter: Vegas Health LLC
5	December 8, 2017	\$215,733.00	Counter withdrawal from Vegas Health U.S. Bank Business Checking account ending in #8262
6	December 8, 2017	\$50,000.00	Cashier's check issued to Lavish Life Ent with purpose/remitter: Vegas Health
7	December 8, 2017	\$20,000.00	Cashier's check issued to Estella Hines with purpose/remitter: Vegas Health
8	December 8, 2017	\$50,000.00	Cashier's check issued to Just a Touch of Love with purpose/remitter: Vegas Health
9	December 11, 2017	\$20,000.00	Cashier's check issued to Shonna Marshall with purpose/remitter: Vegas Health
10	December 12, 2017	\$20,000.00	Online transfer from Wells Fargo account ending in #1310 to Wells Fargo account ending in #4120
11	December 14, 2017	\$20,000.00	Cashier's check issued to Shonna Marshall with purpose/remitter: Vegas Health
12	December 15, 2017	\$20,020.00	Withdrawal from Wells Fargo account ending in #4120
13	December 15, 2017	\$272,098.00	Counter withdrawal from Vegas Health U.S. Bank Business Checking account ending in #8262
14	December 22, 2017	\$50,000.00	Cashier's check issued to Lavish Life Ent with purpose/remitter: Vegas Health
15	December 22, 2017	\$20,530.00	Withdrawal from Wells Fargo account ending in #4120
16	January 4, 2018	\$20,000.00	Online transfer from Wells Fargo account ending in #1310 to Wells Fargo account ending in #4120
17	January 16, 2018	\$20,000.00	Cashier's check issued to Granny's Kitchen LLC with purpose/remitter: Randi Jewel Lewis
18	January 17, 2018	\$20,000.00	Cashier's check issued to Nicole's Closet with remitter: Randi Jewel Lewis

COUNT	APPROXIMATE DATE	AMOUNT	DESCRIPTION
19	January 19, 2018	\$20,000.00	Cashier's check issued to Quick Clean Sweep with purpose/remitter: Randi Jewel Lewis
20	February 5, 2018	\$20,848.55	Withdrawal from Wells Fargo account ending in #8277
21	February 5, 2018	\$50,000.00	Withdrawal from Wells Fargo account ending in #1310
22	February 5, 2018	\$50,000.00	Purchase of Bank Check / Draft from Wells Fargo account ending in #4120
23	February 6, 2018	\$50,000.00	Cashier's check issued to Loving Kindness PCA with purpose/remitter: Vegas Health LLC
24	February 7, 2018	\$50,000.00	Cashier's check issued to Loving Kindness PCA with purpose/remitter: Randi Jewel Lewis
25	February 16, 2018	\$50,000.00	Withdrawal from Wells Fargo account ending in #5721
26	March 16, 2018	\$20,000.00	Withdrawal from Wells Fargo account ending in #5713
27	March 23, 2018	\$10,000.00	Withdrawal from Wells Fargo account ending in #5721

All in violation of NRS 207.195(2), NRS 207.195(4), and NRS 207.195(5).

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

DATED this 30th day of June 2021.

AARON D. FORD  
Attorney General

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