



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 JESSICA CELESTE BROWN,
14 I.D. #2845951,

15 Defendant.

Case No. C-21-357243-1

Dept. No. XX

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 JESSICA CELESTE BROWN, the defendant above
20 named, through Nevada Healing Services L.L.C. (Nevada Healing), has committed the
21 offense(s) of: One (1) Count of **ATTEMPTED SUBMITTING FALSE CLAIMS:**
22 **MEDICAID FRAUD (Category E Felony or Gross Misdemeanor – NRS**
23 **422.540(1)(a), 422.540(2)(a), and 193.330(1)(a)(5) – NOC 56145 or 56146),** and One (1)
24 Count of **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS (Gross**
25 **Misdemeanor – NRS 422.570(1) – NOC 51568),** in Clark County, Nevada.

26 ///

27 ///

28 ///

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 on or about October 22, 2017, to on or about February 2, 2018, Nevada Healing
5 maintained an agreement with Medicaid to be a provider of services. At all times pertinent
6 to these allegations, Nevada Healing maintained a business location at 1875 Verde Mirada
7 Drive, Las Vegas, Nevada 89115, which is located in Clark County. During said time,
8 Defendant was the owner of Nevada Healing and was responsible for submitting claims to
9 Medicaid on behalf of Nevada Healing. Accordingly, Defendant had the requisite authority
10 and/or responsibility pursuant to NRS 422.530.

11
12 **COUNT 1**
13 **ATTEMPTED SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
14 **Category E Felony or Gross Misdemeanor**
15 **NRS 422.540(1)(a), 422.540(2)(a), and 193.330(1)(a)(5)**

16 Defendant, pursuant to a scheme or continuing course of conduct and with the intent
17 to defraud, did attempt to make false claims for payment from Medicaid that Defendant
18 knew were false, to wit:

19 From on or about October 22, 2017, to on or about February 2, 2018, Defendant
20 JESSICA CELESTE BROWN, through Nevada Healing, did knowingly attempt to submit
21 false claims to Medicaid concerning the mental health services allegedly provided to
22 Medicaid recipients in order to receive payment from Medicaid for those services. The
23 Medicaid recipients who purportedly received services from these providers on behalf of
24 Nevada Healing denied receiving said type and/or quantity of services for which Nevada
25 Healing billed Medicaid and subsequently received payment.

26 All of which was committed in Clark County, aggregating an amount greater than
27 \$650, and constitutes a Category E Felony or Gross Misdemeanor in violation of NRS
28 422.540(1)(a), 422.540(2)(a), and 193.330(1)(a)(5).

///

///

1 **COUNT 2**
2 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
3 **Gross Misdemeanor – NRS 422.570(1)**

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

10 From on or about October 22, 2017, to on or about February 2, 2018, Defendant
11 JESSICA CELESTE BROWN, through Nevada Healing, intentionally failed to maintain
12 accurate documentation, including progress notes and service documentation, concerning
13 the services or quantity of services actually provided to Medicaid recipients. Defendant
14 knew these records were used as a basis for claims submitted for reimbursement from
15 Medicaid and that she was required to maintain these records. Defendant subsequently
16 obtained payment for such claimed services.

17 All of which was committed in Clark County and constitutes a Gross Misdemeanor
18 in violation of NRS 422.570(1).

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

22 DATED this 7th day of **July** 2021.

23 AARON D. FORD
24 Attorney General

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