



1 **AINF**  
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14 **DISTRICT COURT**

15 **CLARK COUNTY, STATE OF NEVADA**

16 **THE STATE OF NEVADA,**

17 Plaintiff,

18 vs.

19 **KIMBERLY RASHONE BROUSSARD**  
20 **aka KIMBERLY RASHONE SIMPSON,**  
21 **I.D. #850585,**

22 Defendant.

Case No. C21-357741-2

Dept. No. I

23 **AMENDED INFORMATION**

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

**COUNT I**

**INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
**[NRS 422.570(1), Gross Misdemeanor]**

Defendant, 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 after the date on which payment was received, as are necessary to disclose fully the

1 nature of the goods or services for which the claims were submitted or payment received,  
2 to wit:

3 Defendant intentionally failed to maintain accurate documentation, including  
4 progress notes and service documentation, concerning the services or quantities of services  
5 actually provided by its healthcare professionals to the Medicaid recipients. Defendant  
6 knew these records were used as a basis for claims submitted for reimbursement from  
7 Medicaid. Defendant subsequently obtained payment for such claimed services.

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

11 DATED this 28th day of February, 2022.

12 AARON D. FORD  
13 Attorney General

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