



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

10 THE STATE OF NEVADA,

11 PLAINTIFF,

12 VS.

13 LESHAY DANAIL HARRIS, AKA
14 LESHAY DANAIL KING, AKA LESHAY
15 DANAIL DANIELS,
16 I.D. #3005549,
17 DEFENDANT.

Case No. C-21-357147-1

Dept. No. XXV

17 AMENDED INDICTMENT

18 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
19 Attorney General, and Steven Sidhu, Senior Deputy Attorney General, informs this
20 Honorable Court that LESHAY DANAIL HARRIS, AKA LESHAY DANAIL KING, AKA
21 LESHAY DANAIL DANIELS, the defendant above named, has committed the offense of
22 INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS, a gross misdemeanor
23 violation of NRS 422.570, one (1) count, in Clark County, State of Nevada.

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

27 From on or about July 2015 forward, Foundation Stone Family Services, Inc.
28 (“Foundation Stone”) maintained an agreement with Medicaid to be a provider of services

1 or goods. Under the agreement with Medicaid, Foundation Stone is considered a Provider
2 Type 14, a Behavioral Health Outpatient Treatment provider. At times pertinent to these
3 allegations, Foundation maintained a business location at 8970 West Cheyenne Avenue,
4 Las Vegas, Clark County, Nevada from which it purportedly provided services to Medicaid
5 recipients. Foundation Stone's Medicaid application lists HARRIS as the 100% owner as
6 well as the contact person for the service address, mail-to address, pay-to address and
7 remittance advice address for Foundation Stone, all identified as 4319 Hera Temple, North
8 Las Vegas, Nevada in Clark County. HARRIS's activities included submitting Foundation
9 Stone's electronic claims to Medicaid for services purportedly provided to recipients for
10 which Medicaid provided funds to Foundation Stone. Foundation Stone acted through the
11 actions of HARRIS and HARRIS intended, at least in part, that her actions benefit
12 Foundation Stone.

13 From on or about January 1, 2018 through about May 31, 2018, HARRIS through
14 Foundation Stone submitted numerous claims to Medicaid for reimbursement under the
15 Medicaid numbers of several Medicaid recipients for services purportedly provided by
16 Foundation Stone's healthcare professionals. Through these claims, Foundation Stone
17 represented that its healthcare professionals had provided certain RMH services to these
18 recipients and had provided these services for certain amounts or time, when in fact the
19 healthcare professionals did not provide such services. Medicaid recipients under whose
20 identities DMFS submitted claims and who denied receiving services from Foundation
21 Stone employees are exemplified by T.B. (Medicaid ID 000xxxxx036) and L.M. (Medicaid
22 ID 000xxxxx487). Further, pursuant to the Medicaid Services Manual, HARRIS and
23 Foundation Stone are required to maintain appropriate records to support the claims
24 submitted to Medicaid. In response to the MFCU's request for records, Foundation Stone
25 and HARRIS provided documents that were inconsistent with the claims for services
26 Foundation Stone submitted to Medicaid.

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

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

Defendant HARRIS intentionally failed to maintain accurate documentation, including progress notes and service documentation, concerning the services or quantities of services actually provided by its healthcare professionals to the Medicaid Recipients from on or about September 1, 2014 through August 26, 2017. Defendant HARRIS knew these records were used as a basis for claims submitted for reimbursement from Medicaid. Defendant HARRIS subsequently obtained payment for such claimed services. Many of Foundation Stone's records were missing or did not note accurate or true dates of services, types of services or persons providing services purportedly provided to the Medicaid Recipients.

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

All of which is contrary to the form, force and effect of the statutes in such cases made and provided, and against the peace and dignity of the State of Nevada.

DATED this 9th day of February, 2022.

SUBMITTED BY
AARON D. FORD
Attorney General

By: /s/Steven Sidhu
Steven Sidhu (Bar No. 7516)
Senior Deputy Attorney General
Attorneys for the State of Nevada