



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

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 SOUTHWESTERN HEALTH
14 SOLUTIONS L.L.C.,

15 Defendant.

Case No. C-22-369697-1

Dept. No. 24

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 SOUTHWESTERN HEALTH SOLUTIONS L.L.C., a
20 Nevada limited liability company and the defendant above named, has committed the
21 offense of: one (1) count of **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a
22 Category D Felony in violation of NRS 422.540(1)(a) and NRS 422.540(2)(a) [NOC 56141],
23 in Clark County, Nevada.

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

27 From on or about December 31, 2017, to on or about December 26, 2018, Defendant
28 SOUTHWESTERN HEALTH SOLUTIONS L.L.C. (SOUTHWESTERN) maintained an

1 agreement with Medicaid to be a provider of services or goods. At all times pertinent to
2 these allegations, SOUTHWESTERN maintained business and/or practice locations at
3 5410 Blue Oat Avenue, Las Vegas, Nevada 89141, and/or off of Jones Boulevard in Las
4 Vegas, which are both in Clark County. At all times pertinent to these allegations,
5 SOUTHWESTERN was where: (1) services were purportedly provided to Medicaid
6 recipients through SOUTHWESTERN; (2) claims with Medicaid recipients' information
7 were submitted to Medicaid for payment for services purportedly provided through
8 SOUTHWESTERN; (3) records for services purportedly provided to Medicaid recipients
9 through SOUTHWESTERN were allegedly maintained; and/or (4) Tonda Renee Ward
10 (Ward), through the operation of SOUTHWESTERN, directed or caused the submission of
11 false claims to Medicaid for payment.

12 **COUNT I**
13 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
14 **Category D felony – NRS 422.540(1)(a) and NRS 422.540(2)(a)**

15 Defendant SOUTHWESTERN, pursuant to a scheme or continuing course of conduct
16 and with the intent to defraud, knowingly and intentionally made false claims or caused
17 false claims to be made for payment from Medicaid, with the amount of the claims obtained
18 or sought to be obtained aggregating \$650 or more, to wit:

19 From on or about December 31, 2017, to on or about December 26, 2018, in Clark
20 County, Nevada, Defendant SOUTHWESTERN submitted and/or caused the submission
21 of claims to Medicaid for payment asserting that specific behavioral health services or
22 quantities of services were provided to Medicaid recipients through SOUTHWESTERN and
23 requested reimbursement for provision of services. Defendant knew that such services were
24 not actually provided. Ultimately, Defendant was paid \$650 or more as a result of the
25 submission of false claims.

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1 All of which was committed in Clark County, Nevada, aggregating an amount
2 greater than \$650, and constitutes a Category D Felony in violation of NRS 422.540.

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

6 DATED this **27th** day of **November** 2022.

7 AARON D. FORD
8 Attorney General

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