



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 TONDA RENEE WARD,
14 Defendant.

Case No. C-22-369697-2
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 TONDA RENEE WARD, the defendant above named,
20 has committed the offense of: one (1) count of **INTENTIONAL FAILURE TO MAINTAIN**
21 **ADEQUATE RECORDS**, a Gross Misdemeanor in violation of NRS 422.570(1) [NOC
22 51568], in Clark County, Nevada.

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

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1 From on or about December 31, 2017, to on or about December 26, 2018,
2 Southwestern Health Solutions L.L.C. (SOUTHWESTERN) maintained an agreement
3 with Medicaid to be a provider of services or goods. At all times pertinent to these
4 allegations, SOUTHWESTERN maintained business and/or practice locations at 5410 Blue
5 Oat Avenue, Las Vegas, Nevada 89141, and/or off of Jones Boulevard in Las Vegas, which
6 are both in Clark County. At all times pertinent to these allegations, SOUTHWESTERN
7 was where: (1) services were purportedly provided to Medicaid recipients through
8 SOUTHWESTERN; (2) claims with Medicaid recipients' information were submitted to
9 Medicaid for payment for services purportedly provided through SOUTHWESTERN; (3)
10 records for services purportedly provided to Medicaid recipients through
11 SOUTHWESTERN were allegedly maintained; and/or (4) TONDA RENEE WARD
12 (WARD), through the operation of SOUTHWESTERN, directed or caused the submission
13 of false claims to Medicaid for payment.

14 At all times pertinent to these allegations, WARD was the sole owner of
15 SOUTHWESTERN and had the requisite authority and/or responsibility pursuant to NRS
16 422.530.

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

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

26 From on or about December 31, 2017, to on or about December 26, 2018, in Clark
27 County, Nevada, Defendant WARD, through the operation of SOUTHWESTERN,
28 intentionally failed to maintain accurate documentation, including progress notes and
service documentation, concerning the services, quantity of services, and/or names of

1 rendering service providers who actually provided services to Medicaid recipients.
2 Defendant knew these records were used as a basis for claims submitted for reimbursement
3 from Medicaid. Defendant subsequently obtained payment for such claimed services.

4 All of which was committed in Clark County, Nevada, and constitutes a Gross
5 Misdemeanor in violation of NRS 422.570(1).

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

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

10 AARON D. FORD
11 Attorney General

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