



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

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 LAVELL JAMES WORTHY JR.,  
I.D. #3042331,

14 Defendant.

Case No. C-21-355253-1

Dept. No. 3

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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 LAVELL JAMES WORTHY JR., the defendant above  
20 named, through Spirit of David Behavioral Health, LLC (Spirit of David), has committed  
21 the offense of: one (1) count of **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**  
22 **RECORDS**, a gross misdemeanor in violation of NRS 422.570(1), 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 March 1, 2017, to December 23, 2017, Spirit of David maintained  
2 an agreement with Medicaid to be a provider of services. At all times pertinent to these  
3 allegations, Spirit of David maintained business locations at the following addresses, all of  
4 which are located in Clark County, Nevada: 2113 Sun Avenue, Suite B, North Las Vegas,  
5 Nevada 89030; 4520 South Pecos Road, Suite 3, Las Vegas, Nevada 89121; and 2350 South  
6 Jones Boulevard, Suite 211, Las Vegas, Nevada 89146. During said time, Defendant was  
7 the sole owner of Spirit of David and had the requisite authority and/or responsibility  
8 pursuant to NRS 422.530.

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

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

18 From on or about March 1, 2017, to on or about December 23, 2017, Defendant,  
19 LAVELL JAMES WORTHY JR., through Spirit of David, intentionally failed to maintain  
20 accurate documentation, including progress notes and service documentation, concerning  
21 the services or quantity of services actually provided to Medicaid recipients. Defendant  
22 knew these records were used as a basis for claims submitted for reimbursement from  
23 Medicaid and that he was required to maintain these records. Defendant subsequently  
24 obtained payment for such claimed services.

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

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

4 DATED this 19th day of April 2021.

5 AARON D. FORD  
6 Attorney General

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