



1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 10/22/2020, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 Plaintiff,

13 vs.

14 **STEFAN RYAN FLOWERS aka**
15 **STEFAN TOWNER**
I.D. #1875757

16 Defendant.

Case No. C20-351527-2

Dept. No. 3

17 **INFORMATION**

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 STEFAN RYAN FLOWERS aka STEFAN TOWNER, the Defendant
21 above named, has committed the offense of **SUBMITTING FALSE CLAIMS: MEDICAID**
22 **FRAUD**, a category D felony violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1)
23 count, as follows:

24 **COUNT I**

25 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
26 **[NRS 422.540(1)(a) and NRS 422.540(2)(a), Felony, Category D]**

27 Defendant, through a scheme or continuous course of conduct, with intent to defraud,
28 knowingly and intentionally made false claims or caused false claims to be made for
payment from Medicaid, in an aggregate amount greater than or equal to \$1,200:

1 From about November 5, 2017 through June 15, 2018, in Clark County, Nevada,
2 Defendant through Go With the Flow Behavioral Health, L.L.C. (“GWTF”) submitted
3 claims to Medicaid asserting that specific services or quantities of services were provided
4 to the Medicaid recipients by GWTF healthcare providers and requested reimbursement
5 for provision of services. Defendant knew that such services were not actually provided as
6 the healthcare providers employed by GWTF did not provide the types of services and/or
7 did not submit records claiming to have provided such services. The Medicaid recipients
8 did not receive the specific services or quantities of services from GWTF that Defendant
9 claimed were delivered to the Medicaid recipients.

10 Defendant did in fact make false claims to Medicaid, resulting in payment from
11 Medicaid in an amount greater than or equal to \$1,200.

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

15 DATED this 19th day of October, 2020.

16 AARON D. FORD
17 Attorney General

18 By: /s/ Steven Sidhu
19 STEVEN SIDHU (Bar. No. 7516)
20 Senior Deputy Attorney General