



CLERK OF THE COURT

**INFM**

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7 **(I.A. 04/22/2014, 9:30 A.M.)**

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA, )

11 Plaintiff, )

12 v. )

13 **ROMEKA NAYTESA RICHARDSON** )  
ID No. 1756058, )

14 Defendant. )  
15

Case No.: C14-297142-1

Dept. No.: XII

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO,  
18 Nevada Attorney General, and Andrew Schulke, Sup. Senior Deputy Attorney General,  
19 informs this Honorable Court that ROMEKA NAYTESA RICHARDSON, the Defendant  
20 above named, has committed the offense of Failure to Maintain Adequate Records, a gross  
21 misdemeanor violation of NRS 422.570(1), one (1) count, in Clark County, State of Nevada as  
22 follows:

23 **COUNT ONE**

24 **FAILURE TO MAINTAIN ADEQUATE RECORDS**  
**(NRS 422.570(1) Gross Misdemeanor)**

25 Defendant, upon causing claims to be submitted or payment received pursuant to the  
26 Nevada State Medicaid plan, did knowingly and intentionally fail to maintain such records as  
27 are necessary to disclose fully the nature of the goods or services for which the claims were  
28 submitted or payment was received for at least 5 years after the date on which payment was

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1 received. The actions occurred as part of Defendant's routine business practices/scheme or  
2 continuous course of conduct, to wit:

3 On or about January 2012 through May 2012, Defendant owned and operated All  
4 About You Behavioral Health Services, Inc. (AAY). During times stated herein, AAY was  
5 located at 7473 W. Lake Mead Blvd. Suite 223, Las Vegas, NV and 8916 Attic Grace Avenue,  
6 North Las Vegas, Nevada. While operating and submitting Medicaid claims for AAY,  
7 Defendant did knowingly fail to maintain accurate documentation, including progress notes  
8 and time and attendance documents, concerning the behavioral health services allegedly  
9 provided to Medicaid recipients M.W. (Medicaid ID# 000XXX613), I.C. (Medicaid ID#  
10 000XXXXX647), E.C. (Medicaid ID# 000XXXXX650), A.M. (Medicaid ID# 000XXXXX828),  
11 D.B. (Medicaid ID #000XXXXX617), and T.H. (Medicaid ID # 000XXXXX896). Defendant  
12 knew these records were used as a basis for claims submitted for reimbursement from  
13 Medicaid. Defendant subsequently received payment for such claimed services. Defendant  
14 intentionally failed to maintain accurate records that are necessary to fully disclose the nature  
15 of the service for those claims. The documentation was inaccurate as many of Defendant's  
16 records did not note the actual provider of services, dates or service, or types of services  
17 provided to the Medicaid recipients.

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

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

23 Dated this 8<sup>th</sup> day of April, 2014.

24 CATHERINE CORTEZ MASTO  
25 Attorney General

26 By:   
27 ANDREW SCHULKE  
28 Sup. Senior Deputy Attorney General  
Medicaid Fraud Control Unit