

1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 06/08/17, 10:00 A.M.)

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 **THE STATE OF NEVADA,**
12 **Plaintiff(s),**

Case No. C17-323900-1
Dept. No. XIX

13 vs.

14 **KENNETH HOLLINGSWORTH**
I.D. #1575199,
15 **Defendant(s).**

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada
18 Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,
19 informs this Honorable Court that KENNETH HOLLINGSWORTH, the Defendant above
20 named, has committed the offense of: **INTENTIONAL FAILURE TO MAINTAIN**
21 **ADEQUATE RECORDS**, a gross misdemeanor violation of NRS 422.570(1), one (1) count,
22 in Clark County, State of Nevada, as follows:

23 **COUNT I**
24 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
[NRS 422.570(1), Gross Misdemeanor]

25 Defendant, upon causing claims to be submitted or payment received pursuant to
26 the Nevada State Medicaid plan, did intentionally fail to maintain such records as are
27 necessary to disclose fully the nature of the goods or services for which the claims were
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1 submitted or payment was received for at least 5 years after the date on which payment
2 was received. The actions occurred as part of Defendant's routine business
3 practices/scheme or continuous course of conduct, to wit:

4 From on or about November 2013 to February 2015, Because We Care, LLC (BWC),
5 Men on the Rise, Inc. (MOR) and New Visions Behavioral Health Academy, LLC (New
6 Visions), all located in Clark County, Nevada, submitted claims to Medicaid for
7 reimbursement for services allegedly provided by Defendant to Medicaid recipients.
8 Defendant intentionally failed to maintain accurate documentation, including progress
9 notes, concerning the services actually provided to the Medicaid recipients. Many of
10 Defendant's records did not note accurate or true dates or types of services purportedly
11 provided to the Medicaid recipients.

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 2nd day of June, 2017.

16 ADAM PAUL LAXALT
17 Attorney General

18 By: 
19 ANDREW SCHULKE (Bar. No. 10218)
20 Sup. Senior Deputy Attorney General
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