

1 INFM
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8 Attorneys for State of Nevada
(I.A. 02/22/2018, 10:00 A.M.)

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 THE STATE OF NEVADA,
12 Plaintiff,

Case No. C18-329875-1
Dept. No. IX

13 vs.

14 BECAUSE WE CARE, LLC
I.D. #X0161296,
15 Defendant.

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17 CRIMINAL INFORMATION

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

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

26 Defendant Because We Care LLC, upon submitting a claim for or upon receiving
27 payment for goods or services pursuant to Medicaid, intentionally failed to maintain such
28 records as are necessary to disclose fully the nature of the goods or services for which the

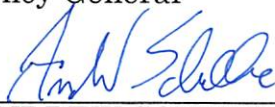
1 claims were submitted or payment received, for at least 5 years after the date on which
2 payment was received, to wit:

3 From about November 3, 2013 through September 25, 2015, in Clark County,
4 Nevada, Defendant Because We Care LLC (BWC) submitted claims to Medicaid for
5 payment of services purportedly rendered. Defendant BWC failed to maintain accurate or
6 true records, including: dates, times or length of services provided; provider names; or types
7 of services that were purportedly provided to Medicaid recipients.

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

11 DATED this 21st day of February, 2018.

12 ADAM PAUL LAXALT
13 Attorney General

14 By: 
15 ANDREW SCHULKE (Bar. No. 10218)
16 Sup. Senior Deputy Attorney General
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