



1 **INFM**
ADAM PAUL LAXALT
2 Attorney General
Andrew Schulke (Bar. No. 10218)
3 Sup. Senior Deputy Attorney General
State of Nevada
4 Office of the Attorney General
555 East Washington Avenue #3900
5 Las Vegas, NV 89101
(702) 486-3420 (phone)
6 (702) 486-3768 (fax)
ASchulke@ag.ng.gov

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8 Attorneys for State of Nevada
(I.A. 05/16/2018, 10:00 A.M.)

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

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

Case No. C18-331848-1

Dept. No. IX

13 vs.

14 **WE CARE BEHAVIORAL HEALTH**
AGENCY, LLC
15 **I.D. #X0163120,**

16 **Defendant(s).**

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 WE CARE BEHAVIORAL HEALTH AGENCY, LLC,
21 the Defendant above named, has committed the offense of: INTENTIONAL FAILURE TO
22 MAINTAIN ADEQUATE RECORDS, a gross misdemeanor violation of NRS 422.570(1),
23 one (1) count, 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, upon causing claims to be submitted or payment received pursuant to
27 the Nevada State Medicaid plan, did intentionally fail to maintain such records as are
28 necessary to disclose fully the nature of the goods or services for which the claims were

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 April 2016 to August 2017, We Care Behavioral Health Agency,
5 LLC (We Care), located in Clark County, Nevada, submitted claims to Medicaid for
6 reimbursement for services allegedly provided by Defendant We Care to Medicaid
7 recipients. Defendant We Care intentionally failed to maintain accurate documentation,
8 including progress notes, concerning the services actually provided to the Medicaid
9 recipients. Many of Defendant We Care's records did not note accurate or true dates or
10 types of services purportedly provided to the Medicaid recipients.

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

14 DATED this 10th day of May, 2018.

15 ADAM PAUL LAXALT
16 Attorney General

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