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FILED
SEP 12 2019
NORTH LAS VEGAS JUSTICE COURT
BY 

8 JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP
9 CLARK COUNTY, STATE OF NEVADA

10 THE STATE OF NEVADA,


11 Plaintiff,

12 vs.

13 BRANDY LATOYA WILLIAMS
aka BRANDY LATOYA MITCHELL,
14 I.D. #1936521,

15 Defendant.

Case No. 19FN2579X

Dept. No. 



16 CRIMINAL COMPLAINT

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
18 Attorney General, and BEHNAZ F. SALIMIAN, Senior Deputy Attorney General,
19 complains and declares, upon information, belief and/or personal knowledge that:

20 BRANDY LATOYA WILLIAMS aka BRANDY LATOYA MITCHELL, the above-
21 named defendant, through Busy Bee Behavioral Health LLC (Busy Bee), in North Las
22 Vegas Township, County of Clark, State of Nevada, committed the offense(s) of: one (1)
23 count of **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a category D felony in
24 violation of NRS 422.540(1)(a) and NRS 422.540(2)(a); one (1) count of **INTENTIONAL**
25 **FAILURE TO MAINTAIN ADEQUATE RECORDS**, a gross misdemeanor in violation
26 of NRS 422.570(1); and one (1) count of **THEFT IN THE AMOUNT OF \$3,500 OR**
27 **MORE**, a category B felony in violation of NRS 205.0832(1)(c), NRS 205.0834, and NRS
28 205.0835(4).

1 Defendant committed said offenses against the State of Nevada, Department of
2 Health & Human Services, Health Care Financing and Policy Division – Nevada Medicaid
3 (Medicaid) in the following manner:

4 From on or about January 4, 2015, to February 25, 2017, Busy Bee maintained an
5 agreement with Medicaid to be a provider of services. At all times pertinent to these
6 allegations, Busy Bee maintained business locations at 4345 Corporate Center Drive, Suite
7 204, North Las Vegas, Nevada 89030, and 6649 North McCarran Street, North Las Vegas,
8 Nevada 89086, both of which were located in Clark County. During said time, Defendant
9 was the sole owner responsible for billing and submitting all claims to Medicaid on behalf
10 of Busy Bee and had the requisite authority or responsibility pursuant to NRS 422.530.

11 **COUNT I**

12 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
13 **Category D felony – NRS 422.540(1)(a) and NRS 422.540(2)(a)**

14 Defendant, pursuant to a scheme or continuing course of conduct and with the intent
15 to defraud, made or caused to be made false claims for payment from Medicaid that
16 Defendant knew were false, to wit:

17 From on or about January 4, 2015, to February 25, 2017, Defendant, through Busy
18 Bee, did knowingly submit false claims to Medicaid concerning the Rehabilitative Mental
19 Health (RMH) services allegedly provided to Medicaid recipients in order to receive
20 payment from Medicaid for those services. The service providers denied providing the type
21 and/or quantity of services on behalf of Busy Bee to the Medicaid recipients, and the
22 Medicaid recipients who purportedly received services from these providers on behalf of
23 Busy Bee denied receiving said type and/or quantity of services for which Busy Bee billed
24 Medicaid.

25 All of which was committed in Clark County, aggregating an amount greater than
26 \$650, and constitutes a category D felony in violation of NRS 422.540.

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1 providers provide the specified services and/or quantities of services from Busy Bee that
2 Defendant claimed, through Busy Bee, were provided to the Medicaid recipients. Defendant
3 obtained payment through communication of those material misrepresentations in excess
4 of an aggregated amount of \$3,500.

5 All of which was committed in Clark County, aggregating an amount greater than
6 \$3,500.00, and constitutes a category B felony in violation of NRS 205.0832(1)(c), NRS
7 205.0834, and NRS 205.0835(4).

8 All of which is contrary to the form, force and effect of the statutes in such cases
9 made and provided and against the peace and dignity of the State of Nevada.

10 Said complainant declares under penalty of perjury under the laws of the State of
11 Nevada that the foregoing is true and correct and prays that a Summons in Lieu of Arrest
12 may issue for Defendant, BRANDY LATOYA WILLIAMS aka BRANDY LATOYA
13 MITCHELL, and that Defendant may be dealt with according to law.

14 DATED this 11 day of September, 2019.

15 AARON D. FORD
16 Attorney General

17 By: *AmW Salimian for*
18 BEHNAZ F. SALIMIAN (Bar. No. 13752)
19 Senior Deputy Attorney General
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