



1 **AIND**  
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8 **DISTRICT COURT**  
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 RANDI JEWEL LEWIS,  
14 ID #5989970,

15 Defendant.

Case No. C-19-345595-1

Dept. No. I

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18 **AMENDED INDICTMENT**

19 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada  
20 Attorney General, and BEHNAZ SALIMIAN MOLINA, Senior Deputy Attorney General,  
21 informs this Honorable Court that RANDI JEWEL LEWIS, the defendant above named,  
22 has committed the offenses of: One (1) Count of **SUBMITTING FALSE CLAIMS:**  
23 **MEDICAID FRAUD**, a Category D Felony in violation of NRS 422.540(1)(a) and NRS  
24 422.540(2)(a) [NOC 56141], and One (1) Count of **MONEY LAUNDERING**, a Category C  
25 Felony in violation of NRS 207.195(2) [NOC 61695], in Clark County, Nevada.

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

4 From in or around August 2017 through in or around December 2017, Vegas  
5 Health LLC (Vegas Health) maintained an agreement with Medicaid to be a provider of  
6 services or goods. At all times pertinent to these allegations, Vegas Health maintained  
7 business locations at 5220 Green Vine Street, North Las Vegas, Nevada 89031, and 4933  
8 West Craig Road, Suite 189, North Las Vegas, Nevada 89130, both of which are in Clark  
9 County.

10 From in or around October 2017 through in or around December 2017, Defendant  
11 **RANDI JEWEL LEWIS (LEWIS)** was an agent and/or representative of Vegas Health  
12 authorized to act on Vegas Health’s behalf and had the requisite authority or  
13 responsibility pursuant to NRS 422.530. During said time, **LEWIS** was an authorized  
14 agent and signatory on U.S. Bank Business Checking account ending in #8262, in the  
15 name of Vegas Health, and was authorized to act on behalf of Vegas Health. Said  
16 authority included the ability to open accounts, make deposits, and withdraw funds.

17 **COUNT 1**  
18 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**  
19 **Category D Felony – NRS 422.540(1)(a) and NRS 422.540(2)(a)**

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

23 From in or around October 2017 through in or around December 2017, Defendant  
24 **LEWIS**, through Vegas Health and pursuant to a continuing course of conduct, made  
25 and/or caused false claims to be made to Medicaid for payment asserting that behavioral  
26 health services were provided to Medicaid recipients by various service providers when  
27 Defendant knew those services were never provided. Medicaid recipients under whose  
28 identities **LEWIS**, through Vegas Health, submitted claims and/or caused the submission  
of claims included M.B. (Medicaid ID 000XXXXX750) and B.B. (Medicaid ID

1 000XXXXX335). Service providers under whose Medicaid Provider ID numbers **LEWIS**,  
2 through Vegas Health, submitted claims and/or caused the submission of claims to  
3 Medicaid for payment included Dr. Saleha Baig, Maria Ellis, Jean Fajardo, Nancy Faye,  
4 Jeannie Gaye, Sara Hall, and Trent Hansen. Said service providers denied providing the  
5 services on behalf of Vegas Health and denied ever being employed by Vegas Health. Said  
6 Medicaid recipients who purportedly received services from these providers on behalf of  
7 Vegas Health denied receiving said services for which Vegas Health billed Medicaid and  
8 subsequently received payments.

9 As a result of Defendant's actions regarding submission of false claims to Medicaid,  
10 **LEWIS** received a total of approximately \$1,161,684.32 from Medicaid. Said funds were  
11 deposited electronically into the Vegas Health Business Checking account ending in  
12 #8262 in or about December 2017.

13 All of which was committed in Clark County, aggregating an amount greater than  
14 \$650, and constitutes a Category D Felony in violation of NRS 422.540(1)(a) and NRS  
15 422.540(2)(a).

16 **COUNT 2**  
17 **MONEY LAUNDERING**  
18 **Category C Felony – NRS 207.195(2), NRS 207.195(4), and NRS 207.195(5)**

19 From in or about October 2017 through in or about August 2018, in Clark County,  
20 Nevada, Defendant **LEWIS** did conduct or attempt to conduct financial transactions  
21 concerning any monetary instrument or other property that has a value of \$5,000 or more  
22 with the knowledge that the monetary instrument or other property was directly or  
23 indirectly derived from any unlawful activity, namely Medicaid Fraud, as fully alleged in  
24 Count 1 of this Amended Indictment, with each transaction constituting a separate  
25 violation, as follows:

COUNT	APPROXIMATE DATE	AMOUNT	DESCRIPTION
2	December 29, 2017	\$349,507.24	Cashier's check issued from Vegas Health U.S. Bank business checking account ending in #8262

1 All of which constitutes a Category C Felony in violation of NRS 207.195(2), NRS  
2 207.195(4), and NRS 207.195(5).

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

6 DATED this 27<sup>th</sup> day of **July** 2021.

7 AARON D. FORD  
8 Attorney General

9 By: /s/ Behnaz Salimian Molina  
10 BEHNAZ SALIMIAN MOLINA (Bar. No. 13752)  
11 Senior Deputy Attorney General  
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