



1 **INFM**  
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4 BEHNAZ SALIMIAN MOLINA (Bar. No. 13752)  
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8 **DISTRICT COURT**  
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 KEYANA LANICE JAMILL CARTER,

14 Defendant.

Case No. C21-354923-1

Dept. No. XXX

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada  
18 Attorney General, and BEHNAZ SALIMIAN MOLINA, Senior Deputy Attorney General,  
19 informs this Honorable Court that KEYANA LANICE JAMILL CARTER, the defendant  
20 above named, has committed the offense of: two (2) counts of **INTENTIONAL FAILURE**  
21 **TO MAINTAIN ADEQUATE RECORDS**, a gross misdemeanor in violation of NRS  
22 422.570(1), in Clark County, Nevada.

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

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1 From on or about July 2, 2017, through on or about June 7, 2019, Gentle Touch  
2 maintained an agreement with Medicaid to be a provider of services. At all times pertinent  
3 to these allegations, Gentle Touch maintained business locations in Clark County, Nevada,  
4 at 3365 West Craig Road, Las Vegas, Nevada, 89032, and 2285 Renaissance Drive, Suite  
5 A, Las Vegas, Nevada 89119. Defendant was the sole owner of Gentle Touch and had the  
6 requisite authority or responsibility pursuant to NRS 422.530.

7 **COUNT I**  
8 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
9 **Gross Misdemeanor – NRS 422.570(1)**

10 Defendant, upon submitting a claim for or upon receiving payment for goods or  
11 services pursuant to the State Plan for Medicaid (Plan), did intentionally fail to maintain  
12 such records as are necessary to disclose fully the nature of the goods or services for which  
13 the claim was submitted or payment was received for at least five (5) years after the date  
14 on which payment was received. The actions occurred as part of Defendant's routine  
15 business practices/scheme or continuing course of conduct, to wit:

16 From on or about July 2, 2017, through on or about June 7, 2019, Defendant, through  
17 Gentle Touch, intentionally failed to maintain accurate documentation, including progress  
18 notes and service documentation, concerning the services and/or quantity of services  
19 actually provided to Medicaid recipients. Defendant knew these records were used as a  
20 basis for claims submitted for reimbursement from Medicaid. Defendant subsequently  
21 obtained payment for such claimed services.

22 All of which was committed in Clark County and constitutes a gross misdemeanor  
23 in violation of NRS 422.570(1).

24 **COUNT II**  
25 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
26 **Gross Misdemeanor – NRS 422.570(1)**

27 Defendant, upon submitting a claim for or upon receiving payment for goods or  
28 services pursuant to the State Plan for Medicaid (Plan), did intentionally fail to maintain  
such records as are necessary to disclose fully the nature of the goods or services for which  
the claim was submitted or payment was received for at least five (5) years after the date

1 on which payment was received. The actions occurred as part of Defendant's routine  
2 business practices/scheme or continuing course of conduct, to wit:

3 From on or about July 2, 2017, through on or about June 7, 2019, Defendant, through  
4 Gentle Touch, intentionally failed to maintain accurate documentation, including progress  
5 notes and service documentation, concerning the services and/or quantity of services  
6 actually provided to Medicaid recipients. Defendant knew these records were used as a  
7 basis for claims submitted for reimbursement from Medicaid. Defendant subsequently  
8 obtained payment for such claimed services.

9 All of which was committed in Clark County and constitutes a gross misdemeanor  
10 in violation of NRS 422.570(1).

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 5th day of April 2021.

15 AARON D. FORD  
16 Attorney General

17 By: /s/ Behnaz Salimian Molina  
18 BEHNAZ SALIMIAN MOLINA (Bar. No. 13752)  
19 Senior Deputy Attorney General  
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