



1 **AINF**
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14 (I.A. 05/27/2021, 10:00 A.M.)
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9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 THE STATE OF NEVADA,
12 Plaintiff,

13 vs.

14 AARON TYRONE WILLIAMS
15 aka AARON KAREEM WILLIAMS
16 aka KAREEM WILLIAMS,
17 I.D. #1642104;
18 Defendant.

Case No. C-21-356155-1

Dept. No. XVII

18 **AMENDED INFORMATION**

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 AARON TYRONE WILLIAMS aka AARON KAREEM
22 WILLIAMS aka KAREEM WILLIAMS, the defendant above named, through Aaron
23 Williams Therapy (AWT), in Clark County, Nevada, has committed the offense(s) of: one
24 (1) count of **ATTEMPTED SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a
25 category E felony or gross misdemeanor in violation of NRS 422.540(1)(a), NRS
26 422.540(2)(a), and NRS 193.330(1)(a)(5).

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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 Medicaid
3 (Medicaid) in the following manner:

4 From on or about May 1, 2016, to September 26, 2017, AWT maintained an
5 agreement with Medicaid to be a provider of services. At all times pertinent to these
6 allegations, AWT maintained a business location at 801 South Rancho Drive, Suite D-2,
7 Las Vegas, Nevada 89106, which is located in Clark County. During said time, Defendant
8 was the sole owner of AWT and the only person responsible for billing and submitting all
9 claims to Medicaid on behalf of AWT. Accordingly, Defendant had the requisite authority
10 and/or responsibility pursuant to NRS 422.530.

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12 **COUNT I**
13 **ATTEMPTED SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
14 **Category E felony or Gross Misdemeanor**
15 **NRS 422.540(1)(a), NRS 422.540(2)(a), and NRS 193.330(1)(a)(5)**

16 Defendant, pursuant to a scheme or continuing course of conduct and with the intent
17 to defraud, attempted to make or cause to be made false claims for payment from Medicaid
18 that Defendant knew were false, to wit:

19 From on or about May 1, 2016, to September 26, 2017, Defendant, through AWT, did
20 knowingly attempt to submit false claims to Medicaid concerning the mental health
21 services allegedly provided to Medicaid recipients in order to receive payment from
22 Medicaid for those services. The Medicaid recipients who purportedly received services
23 from these providers on behalf of AWT denied receiving said type and/or quantity of
24 services for which AWT billed Medicaid.

25 All of which was committed in Clark County, aggregating an amount greater than
26 \$650, and constitutes a category E felony or gross misdemeanor in violation of NRS 422.540
27 and NRS 193.330.

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

4 DATED this **20th** day of **May** 2021.

5 AARON D. FORD
6 Attorney General

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