



1 **IND**
2 **AARON D. FORD**
3 Attorney General
4 **BEHNAZ SALIMIAN MOLINA** (Bar No. 13752)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 5175 South Durango Drive
9 Las Vegas, Nevada 89113
10 (702) 486-3420 (phone)
11 (702) 486-0460 (fax)
12 BMolina@ag.nv.gov
13 Attorneys for State of Nevada

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

10 STATE OF NEVADA,

Case No. C-24-388181-2

11 Plaintiff,

Dept. No. XV

12 vs.

13 **LAWRENCE WILLIAM CARTER, JR.**
14 (aka Lawrence Carter, Lawrence Wayne
15 Carter, Larry Carter, Lawrence Flowers,
16 Lawrence Harris, Robert Asher,
17 Paris Turner), #7128439; and
18 **LEASA YVONNE CARTER**
19 (aka Leasa Yvonne Sanders, Leasa Yvonne
20 Gonzalez, Leasa Y. Carter, Leasa Sanders),
21 #8738770,

INDICTMENT

22 Defendant(s).

23 STATE OF NEVADA)
24) ss.
25 COUNTY OF CLARK)

26 The above-named defendants, **LAWRENCE WILLIAM CARTER, JR.** (aka
27 Lawrence Carter, Lawrence Wayne Carter, Larry Carter, Lawrence Flowers, Lawrence
28 Harris, Robert Asher, Paris Turner) and **LEASA YVONNE CARTER** (aka Leasa Yvonne
Sanders, Leasa Yvonne Gonzalez, Leasa Sanders), are accused by the Clark County Grand
Jury of the crime(s) of:

- **RACKETEERING**, a Category B Felony in violation of NRS 207.400 [NOC
53190]¹;

¹ One (1) count against each defendant.

- 1 • **RACKETEERING CONSPIRACY**, a Category B Felony in violation of NRS
2 207.400(1)(j) [NOC 60818]²;
- 3 • **SUBMITTING FALSE STATEMENTS: MEDICAID FRAUD**, a Category
4 D Felony in violation of NRS 422.540(1)(d) and NRS 422.540(2)(a) [NOC
5 56141]³;
- 6 • **SUBMITTING FALSE STATEMENTS: MEDICAID FRAUD**, a Category
7 D Felony in violation of NRS 422.540(1)(b) and NRS 422.540(2)(a) [NOC
8 56141]⁴;
- 9 • **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a Category D
10 Felony in violation of NRS 422.540(1)(a) and NRS 422.540(2)(a) [NOC 56141]⁵;
- 11 • **PERJURY**, a Category D Felony in violation of NRS 422.550 [NOC 51565]⁶;
- 12 • **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**, a
13 Gross Misdemeanor in violation of NRS 422.570(1) [NOC 51568]⁷;
- 14 • **THEFT IN THE AMOUNT OF \$100,000 OR MORE**, a Category B Felony
15 in violation of NRS 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e)
16 [NOC 61963]⁸;
- 17 • **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION**
18 **OF AN OLDER PERSON FOR UNLAWFUL PURPOSE**, a Category B
19 Felony in violation of NRS 205.463(1) and 205.463(3)(a) [NOC 50720]⁹;
- 20 • **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION**
21 **OF ANOTHER PERSON FOR UNLAWFUL PURPOSE**, a Category B
22 Felony in violation of NRS 205.463(1) [NOC 50690]¹⁰;

23 ///

24 ² One (1) count against each defendant.

25 ³ Three (3) counts against each defendant.

26 ⁴ Three (3) counts against each defendant.

27 ⁵ Eight (8) counts against each defendant.

28 ⁶ Six (6) counts against each defendant.

⁷ Three (3) counts against each defendant.

⁸ Three (3) counts against each defendant.

⁹ Eleven (11) counts against Defendant LARRY CARTER.

¹⁰ Five (5) counts against Defendant LARRY CARTER.

- 1 • **MONEY LAUNDERING**, a Category C Felony in violation of NRS
2 207.195(1)(a), NRS 207.195(4), and NRS 207.195(5) [NOC 61694]¹¹; and
- 3 • **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN**
4 **COURSE OF ENTERPRISE OR OCCUPATION**, a Category B Felony in
5 violation of NRS 205.377 [NOC 55110]¹².

6 Defendants committed said offenses against the Nevada Medicaid Division
7 (Medicaid) and Medicaid recipients in the following manner:

8 **COUNT 1**
9 **RACKETEERING**

10 **Category B felony – NRS 207.400(1)(c), NRS 207.400(1)(d),**
11 **NRS 207.400(1)(f), and NRS 207.400(1)(i)**

12 1. Defendants **LAWRENCE WILLIAM CARTER, JR. (LARRY CARTER)** and
13 **LEASA YVONNE CARTER (LEASA CARTER)**, within Clark County, Nevada, (1) while
14 employed by or associated with an enterprise, did knowingly, willfully, and feloniously
15 conduct or participate, directly or indirectly, in: (i) the affairs of the enterprise through
16 racketeering activity, or (ii) racketeering activity through the affairs of the enterprise;
17 and/or (2) intentionally organized, managed, directed, supervised, or financed a criminal
18 syndicate; and/or (3) furnished advice, assistance, or direction in the conduct, financing, or
19 management of the affairs of the criminal syndicate with the intent to promote or further
20 the criminal objectives of the syndicate; and/or (4) while knowing that property represents
21 proceeds of, or is directly or indirectly derived from, any unlawful activity, conducted or
22 attempted to conduct any transaction involving the property: (i) with the intent to further
23 racketeering activity, or (ii) with the knowledge that the transaction conceals the location,
24 source, ownership or control of the property; and/or (5) aided or abetted one or more others
25 to engage in said conduct, to wit:

26 2. Counts 2 through 70 are hereby incorporated herein as if fully set forth in this
27 count and described in detail below.

28 ¹¹ Twenty-three (23) counts against Defendant LARRY CARTER.

¹² Three (3) counts against each defendant.

1 **The Enterprise**

2 3. From on or about November 21, 2017, through on or about June 10, 2021, as
3 further specified in the individual counts of this Indictment, Defendants operated and
4 controlled an enterprise known as L & L Investments, also known as “The Umbrella” (“the
5 Enterprise”). The Enterprise directed Medicaid provider enrollment, service authorization,
6 billing, and distribution of Medicaid proceeds across multiple affiliated companies
7 (“Umbrella companies”), including Paradigm Shift Health Services L.L.C. (Paradigm
8 Shift), Aurtism, L.L.C. (Aurtism), and Kae’s Cube of Life L.L.C. (Kae’s), and others.
9 Participants and associates of the Enterprise knowingly made false representations to
10 Medicaid to obtain provider enrollment and service authorizations, submitted false claims
11 for payment, misappropriated provider identities, and used standardized billing templates
12 and coordinated billing practices to facilitate and conceal the scheme. At all relevant times,
13 L & L Investments maintained business locations at (1) 7430 Baroque Court, Sun Valley,
14 Nevada 89433, in Washoe County, Nevada, and/or (2) 6600 West Charleston Boulevard,
15 Las Vegas, Nevada 89146, in Clark County, Nevada. The Umbrella companies conducted
16 operations in Clark County, Nevada, as detailed in the individual counts of this Indictment.

17 4. Defendants LARRY CARTER and LEASA CARTER participated in the
18 Enterprise by engaging in the activities described in Counts 2 through 70 as well as the
19 following activities:

- 20 (a) At all relevant times, Defendants LARRY CARTER and LEASA CARTER
21 (“the Carters”) owned and operated L & L Investments, a Nevada-based
22 company purportedly providing consulting services to Medicaid-contracted
23 companies. Previously, LEASA CARTER was the owner of LC Providers, a
24 Medicaid-contracted company. On or about September 30, 2014, LEASA
25 CARTER’S Medicaid contract was terminated, and she was sanctioned and
26 excluded from participating in Medicaid for 7 years. LARRY CARTER owned
27 50% or more in Silver State Behavioral Health Inc (SSBH), a Medicaid-
28 contracted provider. On or about March 17, 2016, LARRY CARTER had his

1 contract terminated, and he was sanctioned and excluded from participating
2 in Medicaid for 7 years.

3 **(b)** At all relevant times stated herein, LEASA CARTER and LARRY CARTER
4 were sanctioned and excluded from Medicaid and were therefore prohibited
5 from participating in any way with Medicaid-contracted providers.

6 **(c)** Despite explicit prohibition, LARRY CARTER and LEASA CARTER
7 maintained agreements, through L & L Investments, with the Umbrella
8 companies and their respective owners, as detailed in this Indictment,
9 wherein they agreed to and did perform various operational tasks for the
10 Umbrella companies, including:

11 **(i)** facilitating the completion and submission of Medicaid provider
12 applications and other requisite documentation;

13 **(ii)** submitting and/or aiding in the submission of Medicaid billing;

14 **(iii)** linking individual providers within the Medicaid system to Umbrella
15 companies, with and/or without the providers' knowledge;

16 **(iv)** hiring, supervising, and/or directing Umbrella billers to submit
17 Medicaid claims pursuant to instructions provided by LARRY
18 CARTER, LEASA CARTER, and other Umbrella associates;

19 **(v)** obtaining money from Medicaid through Umbrella companies and
20 through material misrepresentations to Medicaid, while intentionally
21 failing to disclose to Medicaid that they were obtaining said money for
22 their involvement with the Umbrella companies;

23 **(vi)** providing financing to Umbrella companies (this pertaining to LARRY
24 CARTER only); and/or

25 **(vii)** intentionally concealing their involvement with the Umbrella
26 companies from Medicaid, disclosure of which is explicitly required by
27 Medicaid.

28 ///

- 1 (d) In exchange for their operation of and assistance with these Umbrella
2 companies, which they characterized as “consultant services,” Umbrella
3 companies agreed to pay LARRY CARTER and LEASA CARTER, through L
4 & L Investments, a percentage of the “Medicaid billing” (the money deposited
5 into the Umbrella company’s bank account by Medicaid).
- 6 (e) At all relevant times, LARRY CARTER was an owner and authorized signer
7 of the Wells Fargo Bank account ending in #8657 in the name of L & L
8 Investments, into which checks written from the Umbrella companies were
9 deposited. Payments from said Umbrella companies were made pursuant to
10 the agreements entered into by LEASA CARTER on behalf of L & L
11 Investments.
- 12 (f) At all relevant times, L & L Investments operated as a criminal syndicate, as
13 it consisted of a combination of persons, so structured that it would continue
14 its operation even if individual members entered or left the organization,
15 which engaged in or had the purpose of engaging in racketeering activity, to
16 include theft, perjury, identity theft, money laundering, and/or multiple
17 transactions involving fraud or deceit in the course of enterprise or occupation,
18 as detailed in Counts 3 through 70 of this Indictment. L & L Investments’
19 associates, including its billers, were replaceable such that L & L Investments
20 would continue to operate if said individual members left the organization.
- 21 (g) At all relevant times, LARRY CARTER and LEASA CARTER intentionally
22 organized, managed, directed, supervised, and/or financed L & L Investments.
23 Defendants were named managing members, per Secretary of State
24 documentation, of L & L Investments with authority to conduct its affairs.
25 Defendants financed L & L Investments and its operations, including loaning
26 money to one or more Umbrella companies, paying for business licenses for
27 one or more Umbrella companies, paying for the office space used by L & L
28 Investments to conduct its affairs, and/or paying Umbrella associates

1 (including Umbrella billers).

2 **(h)** Further, LARRY CARTER, while knowing that property represents proceeds
3 of, or is directly or indirectly derived from, any unlawful activity, namely
4 Medicaid fraud, theft, and/or perjury, as detailed in Counts 3 through 8, 17
5 through 25, and 46 through 56 of this Indictment, conducted or attempted to
6 conduct any transaction involving the property: (i) with the intent to further
7 racketeering activity, or (ii) with the knowledge that the transaction conceals
8 the location, source, ownership or control of the property, as detailed in Counts
9 15, 31 through 44, and 62 through 69. LARRY CARTER intentionally failed
10 to disclose to Medicaid that he was involved in the Umbrella companies while
11 he directed the submission of false claims and/or representations to Medicaid
12 knowing that Medicaid would rely on said material misrepresentation in
13 issuing payments to the Umbrella companies. Then, while knowing that
14 checks or other monetary instruments received from Umbrella companies
15 were proceeds of, or directly or indirectly derived from the aforementioned
16 unlawful activity, LARRY CARTER accepted, deposited, withdrew, issued
17 checks, or otherwise conducted financial transactions involving the
18 unlawfully obtained money from Medicaid with the intent to further the
19 operations of L & L Investments (including paying its associates), with the
20 intent to further other unlawful activities, and/or with the knowledge that the
21 transaction concealed the fact that the money was obtained unlawfully from
22 Medicaid through L & L Investments and the Umbrella companies.

23 **Aurtism L.L.C. (one of the Umbrella companies)**

24 **5.** With respect to Aurtism L.L.C. (Aurtism), LARRY CARTER, and LEASA
25 CARTER:

26 **(a)** From on or about June 25, 2019, through on or about October 18, 2019,
27 Aurtism, a Nevada Limited Liability Company, maintained an agreement
28 with Medicaid to be a provider of services or goods. Under the agreement with

1 Medicaid, Aurtism was a Provider Type 14, which is a Behavioral Health
2 Outpatient Treatment provider.

3 **(b)** At all times pertinent to these allegations, Aurtism maintained business
4 locations at the following, all of which are located in Clark County, Nevada:
5 609 West Adams Avenue, Las Vegas 89106; and/or 4880 East Bonanza Road,
6 Suite 9, Las Vegas 89110. At all times pertinent to these allegations, Aurtism
7 was where and/or the mechanism used by which: (1) Medicaid-contracted
8 service provider Luke Hatch purportedly provided services to Medicaid
9 recipients through Aurtism; (2) claims with Medicaid recipient information
10 were submitted to Medicaid for payment for services purportedly provided by
11 Luke Hatch through Aurtism; (3) false statements or representations were
12 made to obtain authorization to provide services to Medicaid recipients
13 through Aurtism; (4) false statements or representations were made in order
14 to qualify as a Medicaid provider; and/or (5) records for services purportedly
15 provided to Medicaid recipients by Luke Hatch through Aurtism were
16 allegedly maintained.

17 **(c)** At all times relevant to these allegations, Defendants LARRY CARTER and
18 LEASA CARTER were owners, agents, managing employees, and/or persons
19 with controlling interest in Aurtism. During said time, Defendants LARRY
20 CARTER and LEASA CARTER had the requisite authority and/or
21 responsibility pursuant to NRS 422.530. Defendants had the authority or
22 responsibility to: (1) make claims, statements, or representations to Medicaid;
23 (2) supervise another who made claims, statements, or representations to
24 Medicaid; and/or (3) authorized the making of claims, statements, or
25 representations to Medicaid, whether by operation of law, business or
26 professional practice, or office procedure; and exercised that authority or
27 responsibility or failed to do so and, as a direct or indirect result, false claims,
28 statements, and/or representations were made to Medicaid pertaining to

1 Aurtism.

2 (d) When enrolling Aurtism, Defendants failed to disclose requisite criminal
3 histories and exclusion information. Medicaid confirmed that had it known
4 about LEASA CARTER'S involvement with Aurtism, Medicaid would not
5 have approved Aurtism's Medicaid enrollment application. Similarly, LARRY
6 CARTER'S exclusion from Medicaid and/or his criminal history would have
7 prevented Aurtism from becoming a Medicaid-contracted provider and,
8 consequently, would have prevented Defendants from being able to bill
9 Medicaid for any services allegedly rendered to Medicaid recipients through
10 Aurtism. Therefore, all of the approximately **2,274 claims** submitted through
11 Aurtism, and all of the money paid for services allegedly provided through
12 Aurtism, which totaled approximately **\$232,279.72**, were submitted and
13 obtained through concealment of a material fact.

14 (e) Aurtism acted through the actions of LARRY CARTER and LEASA CARTER;
15 and LARRY CARTER and LEASA CARTER intended, at least in part, that
16 their actions benefited Aurtism. As a result of the submission of said false
17 claims, Medicaid deposited payments into Aurtism's Bank of America bank
18 account ending in #9120.

19 **Kae's Cube of Life L.L.C. (one of the Carter Umbrella companies)**

20 **6.** With respect to Kae's Cube of Life L.L.C. (Kae's), LARRY CARTER, and
21 LEASA CARTER:

22 (a) From on or about December 26, 2017, through on or about September 21, 2021,
23 Kae's, a Nevada Limited Liability Company, maintained an agreement with
24 Medicaid to be a provider of services or goods. Under the agreement with
25 Medicaid, Kae's was a Provider Type 14, which is a Behavioral Health
26 Outpatient Treatment provider.

27 (b) At all times pertinent to these allegations, Kae's maintained business
28 locations at the following, all of which are located in Clark County, Nevada:

1 3597 Victory Avenue, Las Vegas 89121; and/or 3903 South Maryland
2 Parkway, Suite 305, Las Vegas 89119. At all times pertinent to these
3 allegations, Kae's was where and/or the mechanism used by which: (1) various
4 service providers purportedly provided services to Medicaid recipients
5 through Kae's; (2) claims with Medicaid recipient information were submitted
6 to Medicaid for payment for services purportedly provided by various service
7 providers through Kae's; (3) false statements or representations were made to
8 obtain authorization to provide services to Medicaid recipients through Kae's;
9 (4) false statements or representations were made in order to qualify as a
10 Medicaid provider; and/or (5) records for services purportedly provided to
11 Medicaid recipients by various service providers through Kae's were allegedly
12 maintained.

13 (c) At all times relevant to these allegations, Defendants LARRY CARTER and
14 LEASA CARTER were owners, agents, managing employees, and/or persons
15 with controlling interest in Kae's. During said time, Defendants LARRY
16 CARTER and LEASA CARTER had the requisite authority and/or
17 responsibility pursuant to NRS 422.530. Defendants had the authority or
18 responsibility to: (1) make claims, statements, or representations to Medicaid;
19 (2) supervise another who made claims, statements, or representations to
20 Medicaid; and/or (3) authorized the making of claims, statements, or
21 representations to Medicaid, whether by operation of law, business or
22 professional practice, or office procedure; and exercised that authority or
23 responsibility or failed to do so and, as a direct or indirect result, false claims,
24 statements, and/or representations were made to Medicaid pertaining to
25 Kae's.

26 (d) When enrolling Kae's, Defendants failed to disclose requisite criminal
27 histories and exclusion information. Medicaid confirmed that had it known
28 about LEASA CARTER'S involvement with Kae's, Medicaid would not have

1 approved Kaes' Medicaid enrollment application. Similarly, LARRY
2 CARTER'S exclusion from Medicaid and/or his criminal history would have
3 prevented Kae's from becoming a Medicaid-contracted provider and,
4 consequently, would have prevented Defendants from being able to bill
5 Medicaid for any services allegedly rendered to Medicaid recipients through
6 Kae's. Therefore, all of the approximately **15,894 claims** submitted through
7 Kae's, and all of the money paid for services allegedly provided through Kae's,
8 which totaled approximately **\$1,031,632.13**, were submitted and obtained
9 through concealment of a material fact.

- 10 (e) Kae's acted through the actions of LARRY CARTER and LEASA CARTER;
11 and LARRY CARTER and LEASA CARTER intended, at least in part, that
12 their actions benefited Kae's. As a result of the submission of said false claims,
13 Medicaid deposited payments into Kaes' Bank of America Business Checking
14 account with account number ending in #3876.

15 **Paradigm Shift Health Services L.L.C. (one of the Carter Umbrella companies)**

16 7. With respect to Paradigm Shift Health Services L.L.C. (Paradigm Shift),
17 LARRY CARTER, and LEASA CARTER:

- 18 (a) From on or about November 15, 2018, through on or about October 16, 2020,
19 Paradigm Shift, a Nevada Limited Liability Company, maintained an
20 agreement with Medicaid to be a provider of services or goods. Under the
21 agreement with Medicaid, Paradigm Shift was a Provider Type 14, which is a
22 Behavioral Health Outpatient Treatment provider.

- 23 (b) At all times pertinent to these allegations, Paradigm Shift maintained
24 business locations at the following, all of which are located in Clark County,
25 Nevada: 102 Gilliflower Avenue, Las Vegas 89183; and/or 1700 East Desert
26 Inn Road, Las Vegas 89169. At all times pertinent to these allegations,
27 Paradigm Shift was where and/or the mechanism used by which: (1) various
28 service providers purportedly provided services to Medicaid recipients

1 through Paradigm Shift; (2) claims with Medicaid recipient information were
2 submitted to Medicaid for payment for services purportedly provided by
3 various service providers through Paradigm Shift; (3) false statements or
4 representations were made to obtain authorization to provide services to
5 Medicaid recipients through Paradigm Shift; (4) false statements or
6 representations were made in order to qualify as a Medicaid provider; and/or
7 (5) records for services purportedly provided to Medicaid recipients by various
8 service providers through Paradigm Shift were allegedly maintained.

9 (c) At all times relevant to these allegations, Defendants LARRY CARTER and
10 LEASA CARTER were owners, agents, managing employees, and/or persons
11 with controlling interest in Paradigm Shift. During said time, Defendants
12 LARRY CARTER and LEASA CARTER had the requisite authority and/or
13 responsibility pursuant to NRS 422.530. Defendants had the authority or
14 responsibility to: (1) make claims, statements, or representations to Medicaid;
15 (2) supervise another who made claims, statements, or representations to
16 Medicaid; and/or (3) authorized the making of claims, statements, or
17 representations to Medicaid, whether by operation of law, business or
18 professional practice, or office procedure; and exercised that authority or
19 responsibility or failed to do so and, as a direct or indirect result, false claims,
20 statements, and/or representations were made to Medicaid pertaining to
21 Paradigm Shift.

22 (d) When enrolling Paradigm Shift with Medicaid, Defendants failed to disclose
23 requisite criminal histories and exclusion information. Medicaid confirmed
24 that had it known about LEASA CARTER'S involvement with Paradigm
25 Shift, Medicaid would not have approved Paradigm Shift's Medicaid
26 enrollment application. Similarly, LARRY CARTER'S exclusion from
27 Medicaid and/or criminal history would have prevented Paradigm Shift from
28 becoming a Medicaid-contracted provider and, consequently, would have

1 prevented Defendants from being able to bill Medicaid for any services
2 allegedly rendered to Medicaid recipients through Paradigm Shift.
3 Accordingly, all of the approximately **8,906 claims** submitted through
4 Paradigm Shift and all of the money paid for services allegedly provided
5 through Paradigm Shift, which totaled approximately **\$915,279.05** were
6 submitted and obtained through concealment of a material fact.

7 (e) Paradigm Shift acted through the actions of LARRY CARTER and LEASA
8 CARTER; and LARRY CARTER and LEASA CARTER intended, at least in
9 part, that their actions benefited Paradigm Shift. As a result of the submission
10 of said false claims, Medicaid deposited payments into Paradigm Shift's JP
11 Morgan Chase bank account ending in #5652 and Wells Fargo Bank account
12 ending in #4645.

13 (f) At all relevant times, LARRY CARTER established the scheme for another
14 Umbrella-associated behavioral health company, Positive Innergy Behavioral
15 Health LLC (PIBH), to bill for services through Paradigm Shift without
16 making requisite disclosures to Medicaid. LARRY CARTER further facilitated
17 the agreements between LEASA CARTER, L & L Investments, and Paradigm
18 Shift. Of the approximately \$915,279.05 paid to Paradigm Shift from
19 Medicaid, approximately \$708,854.91 was paid to PIBH through PIBH's Wells
20 Fargo Bank account ending in #2672.

21 **Racketeering Activity**

22 8. As described in greater detail in the present count and Counts 2 through 70,
23 which charge Defendants with racketeering, racketeering conspiracy, and multiple counts
24 of perjury, theft, identity theft, money laundering, and/or multiple transactions involving
25 fraud or deceit in course of enterprise or occupation, Defendants, either personally or by
26 and through their Umbrella associates, fraudulently obtained money from Medicaid by
27 means of knowingly and falsely representing or failing to disclose their ownership interests
28 in Carter Umbrella companies, submitting or causing the submission of false claims,

1 statements, and/or representation to Medicaid for payment, and/or unlawfully using
2 personal identifying information of Medicaid recipients to submit claims for payment.

3 **9.** Defendants, either personally or by and through their agent(s) or associates,
4 perpetrated said fraudulent acts on Medicaid and/or Medicaid recipients. As detailed in the
5 present count and Counts 2 through 70, Defendants' conduct exhibited the same pattern,
6 intents, result, accomplices, victims, and/or methods of commission, or were otherwise
7 interrelated by distinguishing characteristics and were not isolated incidents.

8 **Property Derived from, Realized Through, or Used or Intended to be Used in the**
9 **Course of the Unlawful Acts**

10 **10.** As a result of said acts, the Defendants obtained at least \$2,000,000.00 from
11 Medicaid.

12 All of which was committed in Clark County, Nevada, and constitutes a Category B
13 Felony in violation of NRS 207.400.

14 **COUNT 2**
15 **RACKETEERING CONSPIRACY**
16 **Category B felony – NRS 207.400(1)(j)**

17 **11.** Defendants LARRY CARTER and LEASA CARTER, from on or about
18 November 21, 2017, through on or about June 10, 2021, within Clark County, Nevada,
19 conspired to commit the crime of racketeering, as set forth in Count 1 of the present
20 charging document. The allegations contained in Count 1 and 3 through 70 are hereby
21 realleged and incorporated herein by reference as if fully set forth in this count and
22 described in detail below.

23 All of which was committed in Clark County, Nevada, and constitutes a Category B
24 Felony in violation of NRS 207.400(1)(j).

25 **COUNT 3**
26 **SUBMITTING FALSE STATEMENTS: MEDICAID FRAUD**
27 **Category D felony – NRS 422.530, NRS 422.540(1)(d), and NRS 422.540(2)(a)**

28 **12.** The allegations contained in Counts 1, 2, and 4 through 70 are hereby
realleged and incorporated herein by reference as if fully set forth in this count and
described in detail below.

1 **13.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
2 Aurtism and pursuant to NRS 422.530, from on or about June 25, 2019, through on or about
3 October 3, 2019, in Clark County, Nevada, pursuant to a continuing course of conduct and
4 with the intent to defraud, made and/or caused false statements or representations to be
5 made for use in qualifying as a provider when Defendants knew said statements or
6 representations were false, in whole or in part, by commission or omission, and which
7 resulted in payment to Defendants in an aggregate amount greater than or equal to \$650,
8 to wit:

9 **14.** Defendants, pursuant to NRS 422.530 and a continuing course of conduct,
10 knowingly and with the intent to defraud Medicaid made and/or caused false statements
11 or representations to be made to Medicaid by:

12 (i) failing to disclose that LARRY CARTER, LEASA CARTER, and/or Kenneth
13 Harrison (Harrison) were owners, agents, managing employees, and/or
14 persons with controlling interest in Aurtism;

15 AND/OR

16 (ii) failing to disclose that three of Aurtism's owners, agents, managing
17 employees, and/or persons with controlling interest in Aurtism had criminal
18 histories and/or were excluded from participating in any Medicaid-contracted
19 companies. Namely, LARRY CARTER and Harrison had criminal histories
20 that were not disclosed on the Medicaid application, and/or LARRY CARTER
21 and LEASA CARTER were excluded and prohibited from participating in
22 Medicaid.

23 **15.** Such information was required to be disclosed in enrollment applications and
24 other documentation to qualify to become a Medicaid-contracted provider. Defendants
25 either submitted or caused the submission of said false information to Medicaid through
26 Aurtism knowing that the application and documentation contained false statements or
27 representations. As a result, Defendants obtained or sought to obtain an aggregate amount
28 greater than or equal to \$650.

1 All of which was committed in Clark County, Nevada, aggregating an amount
2 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
3 422.540(1)(d) and NRS 422.540(2)(a).

4 **COUNT 4**
5 **PERJURY**

6 **Category D Felony – NRS 422.530 and NRS 422.550(2)**

7 **16.** The allegations contained in Counts 1 through 3 and 5 through 70 are hereby
8 realleged and incorporated herein by reference as if fully set forth in this count and
9 described in detail below.

10 **17.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
11 Aurtism and pursuant to NRS 422.530, from on or about June 25, 2019, through on or about
12 October 3, 2019, in Clark County, Nevada, did sign or submit, or cause to be signed or
13 submitted, a statement within an application submitted to Medicaid to participate as a
14 provider indicating that all matters contained therein were true and accurate under the
15 pains and penalties of perjury, knowing that the application, report or invoice contained
16 false information, in whole or in part, by commission or by omission, to wit:

17 **18.** Defendants, pursuant to NRS 422.530, submitted or caused to be submitted
18 an enrollment application to participate as a provider and additional documentation to
19 Medicaid, knowing that the application and documentation failed to disclose requisite
20 information that LARRY CARTER, LEASA CARTER, and/or Harrison were owners,
21 agents, managing employees, and/or persons with controlling interest in Aurtism. The
22 application further failed to disclose the criminal histories of LARRY CARTER and
23 Harrison, and/or it failed to disclose that LARRY CARTER and LEASA CARTER were
24 excluded from participating in Medicaid. The Medicaid application and additional
25 documentation contained a declaration, signed under penalty of perjury, that the
26 information in the application and any attachments were true, accurate, and complete.
27 Defendants signed or submitted, or caused to be signed or submitted, the declaration under
28 penalty of perjury attesting that all matters stated within the application and
documentation were true and accurate knowing that the application and documentation

1 contained false information based on the omission of LARRY CARTER, LEASA CARTER,
2 and/or Harrison, as well as the omissions regarding criminal histories and/or exclusions.
3 Subsequently, and in reliance on the false information contained with the application and
4 documentation submitted by Defendants, Aurtism was approved to be a Medicaid-
5 contracted provider authorized to receive reimbursement from Medicaid for services
6 provided to Medicaid recipients.

7 All of which was committed in Clark County, Nevada, and constitutes a Category D
8 Felony in violation of NRS 422.550(2).

9 **COUNT 5**
10 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
11 **Category D Felony – NRS 422.530, NRS 422.540(1)(a), and NRS 422.540(2)(a)**

12 **19.** The allegations contained in Counts 1 through 4 and 6 through 70 are hereby
13 realleged and incorporated herein by reference as if fully set forth in this count and
14 described in detail below.

15 **20.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
16 Aurtism and pursuant to NRS 422.530, from on or about July 17, 2019, through on or about
17 October 3, 2019, in Clark County, Nevada, pursuant to a scheme or continuing course of
18 conduct and with the intent to defraud, made and/or caused false claims to be made to
19 Medicaid for payment, when Defendants knew said claims were false, and which resulted
20 in payment to Defendants in an aggregate amount greater than or equal to \$650, to wit:

21 **21.** Defendants pursuant to NRS 422.530 and a continuing course of conduct,
22 knowingly and with the intent to defraud Medicaid made and/or caused the submission of
23 false claims to Medicaid for payment asserting that Medicaid-contracted provider Luke
24 Hatch (Hatch) provided various behavioral health services to Medicaid recipients through
25 Aurtism when Defendants knew said services were never provided. Hatch denied providing
26 any services on behalf of Aurtism. Defendants obtained or sought to obtain an aggregate
27 amount greater than or equal to \$650.

28 ///

///

1 All of which was committed in Clark County, Nevada, aggregating an amount
2 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
3 422.540(1)(a) and NRS 422.540(2)(a).

4 **COUNT 6**

5 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**

6 **Category D Felony – NRS 422.530, NRS 422.540(1)(a), and NRS 422.540(2)(a)**

7 **22.** The allegations in Counts 1 through 5 and 7 through 70 are hereby realleged
8 and incorporated herein by reference as if fully set forth in this count and described in
9 detail below.

10 **23.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
11 Aurtism and pursuant to NRS 422.530, from on or about July 17, 2019, through on or about
12 October 3, 2019, in Clark County, Nevada, pursuant to a scheme or continuing course of
13 conduct and with the intent to defraud, made and/or caused false claims to be made to
14 Medicaid for payment, when Defendants knew said claims were false, and which resulted
15 in payment to Defendants in an aggregate amount greater than or equal to \$650, to wit:

16 **24.** Defendants pursuant to NRS 422.530 and a continuing course of conduct,
17 knowingly and with the intent to defraud Medicaid made and/or caused the submission of
18 false claims to Medicaid for payment, asserting that services were provided to Medicaid
19 recipients through Aurtism when those services were never provided. Said claims were for
20 alleged dates of service that took place weeks prior to an email to an Umbrella biller
21 indicating the list of recipients were new clients. Defendants knew the services were not
22 rendered and still submitted or caused the submission of said false claims. The recipients
23 under whose Medicaid ID numbers Defendants submitted false claims included: M.B.
24 (Medicaid ID 704XXXXX001; DOB 12/XX/1956), F.A. (Medicaid ID 000XXXXX432; DOB
25 03/XX/1952), S.P. (Medicaid ID 000XXXXX428; DOB 04/XX/1958), B.C. (Medicaid ID
26 515XXXXX004; DOB 11/XX/1952), C.C. (Medicaid ID 000XXXXX390; DOB 08/XX/1954),
27 and M.C. (Medicaid ID 000XXXXX445; DOB 03/XX/1950). As a result of the submission of
28 the false claims, Defendants obtained and/or sought to obtain \$650 or more from Medicaid.

///'

1 All of which was committed in Clark County, Nevada, aggregating an amount
2 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
3 422.540(1)(a) and NRS 422.540(2)(a).

4 **COUNT 7**
5 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
6 **Gross Misdemeanor – NRS 422.570(1)**

7 **25.** The allegations in Counts 1 through 6 and 8 through 70 are hereby realleged
8 and incorporated herein by reference as if fully set forth in this count and described in
9 detail below.

10 **26.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
11 Aurtism, from on or about July 17, 2019, through on or about June 10, 2021, in Clark
12 County, Nevada, upon submitting a claim for or upon receiving payment for goods or
13 services pursuant to the State Plan for Medicaid (Plan), did intentionally fail to maintain
14 such records as are necessary to disclose fully the nature of the goods or services for which
15 the claim was submitted or payment was received for at least five (5) years after the date
16 on which payment was received. The actions occurred as part of Defendants' routine
17 business practices/scheme or continuing course of conduct, to wit:

18 **27.** Defendants intentionally failed to maintain accurate documentation,
19 including progress notes and service documentation, concerning the services, quantity of
20 services, and/or names of rendering service providers who actually provided services to
21 Medicaid recipients. In many instances, Defendants failed to maintain any records at all to
22 support claims submitted for reimbursement from Medicaid. Defendants knew these
23 records were required to support and substantiate any and all claims submitted for
24 reimbursement from Medicaid. Defendants subsequently obtained payment for such
25 claimed services.

26 All of which was committed in Clark County, Nevada, and constitutes a Gross
27 Misdemeanor in violation of NRS 422.570(1).

28 ///

///

COUNT 8

THEFT IN THE AMOUNT OF \$100,000 OR MORE

Category B Felony – NRS 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e)

1
2
3 **28.** The allegations contained in Counts 1 through 7 and 9 through 70 are hereby
4 realleged and incorporated herein by reference as if fully set forth in this count and
5 described in detail below.

6 **29.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
7 Aurtism, on or about June 25, 2019, through on or about October 3, 2019, in Clark County,
8 Nevada, did, without lawful authority and pursuant to a scheme or continuing course of
9 conduct, knowingly obtain personal property of another person by a material
10 misrepresentation with the intent to deprive that person of the property, where the
11 aggregate value of said property was \$100,000 or more, to wit:

12 **30.** Defendants LARRY CARTER and LEASA CARTER obtained \$100,000 or
13 more from Medicaid, through Aurtism, by knowingly:

14 (i) failing to disclose to Medicaid that LARRY CARTER, LEASA CARTER,
15 and/or Harrison were owners, agents, managing employees, and/or persons
16 with controlling interest in Aurtism. Said information was material to
17 Aurtism being approved by Medicaid to become a Medicaid-contracted
18 provider, as LARRY CARTER and LEASA CARTER were excluded from
19 participating in the Medicaid program, and/or LARRY CARTER and Harrison
20 had criminal convictions that, if properly disclosed, would have prevented
21 Aurtism from becoming a Medicaid-contracted provider;

22 AND/OR

23 (ii) submitting claims or causing the submission of claims to Medicaid for
24 payment under Hatch's NPI for services that were never actually provided.
25 Defendants knew that false claims data showing Aurtism as the billing
26 provider and Hatch as the rendering provider were being transmitted to
27 Medicaid, and subsequent payment for these false claims was being deposited
28 into Aurtism's bank account. The name of the billing provider and rendering

1 provider are material to Medicaid's reimbursing a provider for services
2 allegedly rendered to Medicaid recipients. Medicaid relied on Defendants'
3 material misrepresentations that Hatch was the rendering provider and that
4 services were actually rendered when it reimbursed Aurtism for services
5 allegedly provided to Medicaid recipients through Aurtism;

6 AND/OR

7 (iii) submitting or causing the submission of false back billed claims to
8 Medicaid for payment asserting that services were provided to Medicaid
9 recipients through Aurtism when those services were never provided.
10 Defendants knew the services were not rendered and still submitted or caused
11 the submission of said false claims. The recipients under whose Medicaid ID
12 numbers Defendants submitted false claims included: M.B. (Medicaid ID
13 704XXXXX001; DOB 12/XX/1956), F.A. (Medicaid ID 000XXXXX432; DOB
14 03/XX/1952), S.P. (Medicaid ID 000XXXXX428; DOB 04/XX/1958), B.C.
15 (Medicaid ID 515XXXXX004; DOB 11/XX/1952), C.C. (Medicaid ID
16 000XXXXX390; DOB 08/XX/1954), and M.C. (Medicaid ID 000XXXXX445;
17 DOB 03/XX/1950).

18 **31.** Defendants made or caused to be made said material misrepresentations with
19 the intent to deprive Medicaid of \$100,000 or more. As a result, Defendants obtained
20 \$100,000 or more through Aurtism.

21 All of which was committed in Clark County, Nevada, aggregating an amount
22 greater than or equal to \$100,000, and constitutes a Category B Felony in violation of NRS
23 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e).

24 **COUNTS 9-14**
25 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION**
26 **OF AN OLDER PERSON FOR UNLAWFUL PURPOSE**
27 **Category B Felony – NRS 205.463(1) and NRS 205.463(3)(a)**

28 **32.** The allegations contained in Counts 1 through 8 and 15 through 70 are hereby
reallged and incorporated herein by reference as if fully set forth in this count and

1 described in detail below.

2 **33.** Defendant LARRY CARTER, through the operation of Aurtism, from on or
3 about July 17, 2019, through on or about October 3, 2019, in Clark County, Nevada, either
4 personally or by and through his Umbrella associates, did knowingly and willfully obtain,
5 or directly or indirectly, aid, abet, counsel, encourage, hire, command, induce or otherwise
6 procure another to obtain personal identifying information of another person who is 60
7 years of age or older, and with the intent to commit an unlawful act, used the personal
8 identifying information for an unlawful purpose, to wit:

9 **34.** Defendant knowingly obtained the names, dates of birth, Medicaid account
10 numbers, and/or additional personal identifying information of Medicaid recipients who are
11 60 years of age or older, and with the intent to commit an unlawful act, namely Medicaid
12 fraud and/or theft as detailed in Counts 3 through 6 and 8 of this Indictment, used the
13 personal identifying information of said Medicaid recipients in order to submit false
14 Medicaid claims and to obtain reimbursement from Medicaid for provision of services.
15 Medicaid-contracted service provider Hatch, who LARRY CARTER alleged rendered
16 services to Medicaid recipients, denied rendering said services, and Defendant knew that
17 such services were not actually provided by Hatch on behalf of Aurtism. The Medicaid
18 recipients that were over the age of 60 and whose personal identifying information LARRY
19 CARTER obtained and used for an unlawful purpose, as set forth above, are as follows:

Count	Medicaid Recipient	Medicaid ID #	Date of Birth
9	M.B	704XXXXX001	12/XX/1956
10	F.A.	000XXXXX432	03/XX/1952
11	S.P.	000XXXXX428	04/XX/1958
12	B.C.	515XXXXX004	11/XX/1952
13	C.C.	000XXXXX390	08/XX/1954
14	M.C.	000XXXXX445	03/XX/1950

25
26 **35.** LARRY CARTER directed Umbrella associates to use personal identifying
27 information of Medicaid recipients to back bill for services that he knew were never
28 provided and to bill Medicaid pursuant to a schedule and/or template with the intention

1 that Medicaid would rely on the misrepresentations and make payments to Defendant
2 through Aurtism. At LARRY CARTER'S direction, Umbrella associates submitted said
3 false claims using personal identifying information of Medicaid recipients knowing that the
4 claims were false, which resulted in Medicaid making payments to Defendant through
5 Aurtism.

6 All of which was committed in Clark County, Nevada, and constitutes a Category B
7 Felony in violation of NRS 205.463(1) and NRS 205.463(3)(a).

8 **COUNT 15**
9 **MONEY LAUNDERING**
10 **Category C Felony – NRS 207.195(1)(a) and NRS 207.195(4)**

11 **36.** The allegations contained in Counts 1 through 14 and 16 through 70 are
12 hereby realleged and incorporated herein by reference as if fully set forth in this count and
13 described in detail below.

14 **37.** From on or about August 19, 2019, through on or about October 8, 2019, in
15 Clark County, Nevada, Defendant LARRY CARTER, through L & L Investments, while
16 knowing that a monetary instrument or other property represents the proceeds of or is
17 directly or indirectly derived from any unlawful activity, did conduct or attempt to conduct
18 a financial transaction involving the monetary instrument with (1) the intent to further
19 any unlawful activity; and/or (2) the knowledge that the transaction conceals the location,
20 source, ownership, or control of the instrument or other property, to wit:

21 **38.** Defendant LARRY CARTER, through L & L Investments, while knowing that
22 \$19,003.00 in checks from Aurtism, an Umbrella company, represented proceeds of, or was
23 directly or indirectly derived from, any unlawful activity, namely Medicaid fraud, theft,
24 and/or perjury, as detailed in Counts 3 through 6 and 8 of this Indictment, willfully,
25 unlawfully, and feloniously conducted or attempted to conduct transactions involving the
26 checks by depositing or otherwise accepting the \$19,003.00 in checks that were deposited
27 into Wells Fargo Bank account number ending in #8657, in the name of L & L Investments,
28 in which Defendant LARRY CARTER is the signer and controlling person on the bank
account through which money earned from Medicaid fraud, theft, and/or perjury was

1 moved, knowing that said transactions concealed the source, ownership, or control of the
2 instruments.

3 All of which was committed in Clark County, Nevada, and constitutes a Category C
4 Felony in violation of NRS 207.195(1)(a).

5 **COUNT 16**
6 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**
7 **IN COURSE OF ENTERPRISE OR OCCUPATION**
8 **Category B Felony – NRS 205.377**

9 **39.** The allegations contained in Counts 1 through 15 and 17 through 70 are
10 hereby realleged and incorporated herein by reference as if fully set forth in this count and
11 described in detail below.

12 **40.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
13 Aurtism, from on or about June 25, 2019, through on or about October 3, 2019, in Clark
14 County, Nevada, did, in the course of an enterprise or occupation, knowingly and with the
15 intent to defraud, engage in an act, practice or course of business or employ a device,
16 scheme or artifice which operated or would have operated as a fraud or deceit upon a person
17 by means of a false representation or omission of a material fact that: (a) the person knew
18 to be false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss
19 to any person who relied on the false representation or omission, in at least two
20 transactions that had the same or similar pattern, intents, results, accomplices, victims or
21 methods of commission, or were otherwise interrelated by distinguishing characteristics
22 and were not isolated incidents within four years and in which the aggregate loss or
23 intended loss was more than \$1,200, to wit:

24 **41.** In the course of their enterprise or occupation through Aurtism, Defendants
25 knowingly and with the intent to defraud engaged in a Medicaid fraud operation involving
26 Medicaid fraud, theft, and/or perjury, and which operated as a fraud upon Medicaid.
27 Defendants' continuous course of conduct over the course of approximately three to four
28 months involved at least two instances or transactions of: (1) submitting false statements
or representations to be used in qualifying as a provider when Defendants knew the

1 statements or representations were false; (2) submitting false statements or
2 representations, under penalty of perjury, for use in obtaining authorization to provide
3 services to Medicaid recipients when Defendants knew the statements or representations
4 were false; and/or (3) submitting false claims alleging services were provided to Medicaid
5 recipients, a number of which were over the age of 60, through Aurtism, when Defendants
6 knew the services were never provided. As a result of Defendants' repeated fraudulent
7 conduct involving making false statements, false representations, and/or omissions of
8 material facts that Defendants knew were false and that Defendants intended for Medicaid
9 to rely on, Medicaid ultimately relied on those false statements, false representations, and
10 omissions of material facts and suffered a loss of more than \$1,200.

11 All of which was committed in Clark County, Nevada, and constitutes a Category B
12 Felony in violation of NRS 205.377.

13 **COUNT 17**

14 **SUBMITTING FALSE STATEMENTS: MEDICAID FRAUD**
15 **Category D felony – NRS 422.540(1)(d) and NRS 422.540(2)(a)**

16 **42.** The allegations contained in Counts 1 through 16 and 18 through 70 are
17 hereby realleged and incorporated herein by reference as if fully set forth in this count and
18 described in detail below.

19 **43.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
20 Kae's and pursuant to NRS 422.530, from on or about December 26, 2017, through on or
21 about December 31, 2020, in Clark County, Nevada, pursuant to a continuing course of
22 conduct and with the intent to defraud, made and/or caused false statements or
23 representations to be made for use in qualifying as a provider when Defendants knew said
24 statements or representations were false, in whole or in part, by commission or omission,
25 and which resulted in payment to Defendants in an aggregate amount greater than or equal
26 to \$650, to wit:

27 **44.** Defendants, pursuant to NRS 422.530 and a continuing course of conduct,
28 knowingly and with the intent to defraud Medicaid made and/or caused false statements
or representations to be made to Medicaid by:

1 (i) failing to disclose that LARRY CARTER, LEASA CARTER, and/or Benson
2 Cooks (Cooks) were owners, agents, managing employees, and/or persons with
3 controlling interest in Kae's;

4 AND/OR

5 (ii) failing to disclose that three of Kaes' owners, agents, managing employees,
6 and/or persons with controlling interest in Kae's had criminal histories and/or
7 were excluded from participating in any Medicaid-contracted companies.
8 Namely, LARRY CARTER and Cooks had criminal histories that were not
9 disclosed on the Medicaid application, and/or LARRY CARTER and LEASA
10 CARTER were excluded and prohibited from participating in Medicaid.

11 **45.** Such information was required to be disclosed in enrollment applications and
12 other documentation to qualify to become a Medicaid-contracted provider. Defendants
13 either submitted or caused the submission of said false information to Medicaid through
14 Kae's knowing that the application and documentation contained false statements or
15 representations. As a result, Defendants obtained or sought to obtain an aggregate amount
16 greater than or equal to \$650.

17 All of which was committed in Clark County, Nevada, aggregating an amount
18 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
19 422.540(1)(d) and NRS 422.540(2)(a).

20 **COUNT 18**

21 **PERJURY**

22 **Category D Felony – NRS 422.530 and NRS 422.550(2)**

23 **46.** The allegations contained in Counts 1 through 17 and 19 through 70 are
24 hereby realleged and incorporated herein by reference as if fully set forth in this count and
25 described in detail below.

26 **47.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
27 Kae's and pursuant to NRS 422.530, from on or about December 26, 2017, through on or
28 about December 31, 2020, in Clark County, Nevada, did sign or submit, or cause to be
signed or submitted, a statement within an application submitted to Medicaid to

1 signed or submitted, a statement within an application submitted to Medicaid to
2 participate as a provider indicating that all matters contained therein were true and
3 accurate under the pains and penalties of perjury, knowing that the application, report or
4 invoice contained false information, in whole or in part, by commission or by omission, to
5 wit:

6 **54.** Defendants, pursuant to NRS 422.530, submitted or caused to be submitted
7 an application linking Medicaid-contracted provider Knight to the group provider, Kae's,
8 knowing that the application falsely indicated that Knight authorized Defendants to link
9 her to the group provider. The application contained a declaration, signed under penalty of
10 perjury, that the information in the application and any attachments were true, accurate,
11 and complete. Defendants signed or submitted, or caused to be signed or submitted, the
12 declaration under penalty of perjury attesting that all matters stated within the application
13 and documentation were true and accurate knowing that the application and
14 documentation contained false information. Subsequently, and in reliance on the false
15 information contained within the application and documentation submitted by Defendants,
16 Knight was linked to Kae's, and Kae's was authorized to receive reimbursement from
17 Medicaid for services allegedly provided by Knight to Medicaid recipients.

18 All of which was committed in Clark County, Nevada, and constitutes a Category D
19 Felony in violation of NRS 422.550(2).

20 **COUNT 21**

21 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**

22 **Category D Felony – NRS 422.530, NRS 422.540(1)(a), and NRS 422.540(2)(a)**

23 **55.** The allegations contained in Counts 1 through 20 and 22 through 70 are
24 hereby realleged and incorporated herein by reference as if fully set forth in this count and
25 described in detail below.

26 **56.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
27 Kae's and pursuant to NRS 422.530, from on or about December 26, 2017, through on or
28 about December 31, 2020, in Clark County, Nevada, pursuant to a scheme or continuing
course of conduct and with the intent to defraud, made and/or caused false claims to be

1 made to Medicaid for payment, when Defendants knew said claims were false, and which
2 resulted in payment to Defendants in an aggregate amount greater than or equal to \$650,
3 to wit:

4 **57.** Defendants pursuant to NRS 422.530 and a continuing course of conduct,
5 knowingly and with the intent to defraud Medicaid made and/or caused the submission of
6 false claims to Medicaid for payment asserting that Medicaid-contracted provider Knight
7 provided various behavioral health services to Medicaid recipients through Kae's when
8 Defendants knew said services were never provided. Knight denied providing any services
9 on behalf of Kae's and denied even recognizing the company, Kae's. As a result of the
10 submission of said false claims, Defendants obtained or sought to obtain an aggregate
11 amount greater than or equal to \$650.

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

15 **COUNT 22**

16 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**

17 **Category D Felony – NRS 422.530, NRS 422.540(1)(a), and NRS 422.540(2)(a)**

18 **58.** The allegations contained in Counts 1 through 21 and 23 through 70 are
19 hereby realleged and incorporated herein by reference as if fully set forth in this count and
20 described in detail below.

21 **59.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
22 Kae's and pursuant to NRS 422.530, from on or about December 26, 2017, through on or
23 about December 31, 2020, in Clark County, Nevada, pursuant to a scheme or continuing
24 course of conduct and with the intent to defraud, made and/or caused false claims to be
25 made to Medicaid for payment, when Defendants knew said claims were false, and which
26 resulted in payment to Defendants in an aggregate amount greater than or equal to \$650,
27 to wit:

28 **60.** Defendants pursuant to NRS 422.530 and a continuing course of conduct,
knowingly and with the intent to defraud Medicaid made and/or caused the submission of

1 false claims to Medicaid for payment asserting that Medicaid-contracted provider Genesis
2 Lightbourne (Lightbourne) provided various behavioral health services to Medicaid
3 recipients through Kae's when Defendants knew said services were never provided.
4 Lightbourne denied providing the type and/or quantity of services Defendants alleged that
5 Lightbourne provided on behalf of Kae's. As a result of the submission of said false claims,
6 Defendants obtained or sought to obtain an aggregate amount greater than or equal to
7 \$650.

8 All of which was committed in Clark County, Nevada, aggregating an amount
9 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
10 422.540(1)(a) and NRS 422.540(2)(a).

11 **COUNT 23**

12 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**

13 **Category D Felony – NRS 422.530, NRS 422.540(1)(a), and NRS 422.540(2)(a)**

14 **61.** The allegations contained in Counts 1 through 22 and 24 through 70 are
15 hereby realleged and incorporated herein by reference as if fully set forth in this count and
16 described in detail below.

17 **62.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
18 Kae's and pursuant to NRS 422.530, from on or about December 26, 2017, through on or
19 about December 31, 2020, in Clark County, Nevada, pursuant to a scheme or continuing
20 course of conduct and with the intent to defraud, made and/or caused false claims to be
21 made to Medicaid for payment, when Defendants knew said claims were false, and which
22 resulted in payment to Defendants in an aggregate amount greater than or equal to \$650,
23 to wit:

24 **63.** Defendants pursuant to NRS 422.530 and a continuing course of conduct,
25 knowingly and with the intent to defraud Medicaid made and/or caused the submission of
26 false claims to Medicaid for payment asserting that services were provided to Medicaid
27 recipients through Kae's when those services were never provided. Defendants falsely back
28 billed Medicaid for services allegedly provided to Medicaid recipients weeks or months
before the recipients would have allegedly signed up for services through Kae's. Defendants

1 knew the services were not rendered and still submitted or caused the submission of said
2 false claims. The recipients under whose Medicaid ID numbers Defendants submitted false
3 claims included: R.C. (Medicaid ID 000XXXXX198; DOB 10/XX/1962), B.H. (Medicaid ID
4 000XXXXX586; DOB 12/XX/1958), W.M. (Medicaid ID 672XXXXX005; DOB 09/XX/1949),
5 G.S. (Medicaid ID 000XXXXX010; DOB 11/XX/1959), W.W. (Medicaid ID 000XXXXX468;
6 DOB 09/XX/1958), and C.T. (Medicaid ID 000XXXXX833; DOB 12/XX/1979). As a result of
7 the submission of the false claims, Defendants obtained and/or sought to obtain \$650 or
8 more from Medicaid.

9 All of which was committed in Clark County, Nevada, aggregating an amount
10 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
11 422.540(1)(a) and NRS 422.540(2)(a).

12 **COUNT 24**
13 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
14 **Gross Misdemeanor – NRS 422.570(1)**

15 **64.** The allegations contained in Counts 1 through 23 and 25 through 70 are
16 hereby realleged and incorporated herein by reference as if fully set forth in this count and
17 described in detail below.

18 **65.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
19 Kae's, from on or about December 26, 2017, through on or about May 5, 2021, in Clark
20 County, Nevada, upon submitting a claim for or upon receiving payment for goods or
21 services pursuant to the State Plan for Medicaid (Plan), did intentionally fail to maintain
22 such records as are necessary to disclose fully the nature of the goods or services for which
23 the claim was submitted or payment was received for at least five (5) years after the date
24 on which payment was received. The actions occurred as part of Defendants' routine
25 business practices/scheme or continuing course of conduct, to wit:

26 **66.** Defendants intentionally failed to maintain accurate documentation,
27 including progress notes and service documentation, concerning the services, quantity of
28 services, and/or names of rendering service providers who actually provided services to
Medicaid recipients. In many instances, Defendants failed to maintain any records at all to

1 support claims submitted for reimbursement from Medicaid. Defendants knew these
2 records were required to support and substantiate any and all claims submitted for
3 reimbursement from Medicaid. Defendants subsequently obtained payment for such
4 claimed services.

5 All of which was committed in Clark County, Nevada, and constitutes a Gross
6 Misdemeanor in violation of NRS 422.570(1).

7 **COUNT 25**

8 **THEFT IN THE AMOUNT OF \$100,000 OR MORE**

9 **Category B Felony – NRS 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e)**

10 **67.** The allegations contained in Counts 1 through 24 and 26 through 70 are
11 hereby realleged and incorporated herein by reference as if fully set forth in this count and
12 described in detail below.

13 **68.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
14 Kae's, from on or about December 26, 2017, through on or about December 31, 2020, in
15 Clark County, Nevada, did, without lawful authority and pursuant to a scheme or
16 continuing course of conduct, knowingly obtain personal property of another person by a
17 material misrepresentation with the intent to deprive that person of the property, where
18 the aggregate value of said property was \$100,000 or more, to wit:

19 **69.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
20 Kae's, obtained \$100,000 or more from Medicaid, through Kae's, by knowingly and with the
21 intent to deprive Medicaid:

22 (i) failing to disclose to Medicaid that LARRY CARTER, LEASA CARTER,
23 and/or Cooks were owners, agents, managing employees, and/or persons with
24 controlling interest in Kae's. Said information was material to Kae's being
25 approved by Medicaid to become a Medicaid-contracted provider, as LARRY
26 CARTER and LEASA CARTER were excluded from participating in the
27 Medicaid program, and/or LARRY CARTER and Cooks had criminal
28 convictions that, if properly disclosed, would have prevented Kae's from
becoming a Medicaid-contracted provider;

1 AND/OR

2 (ii) submitting claims or causing the submission of claims to Medicaid for
3 payment under Knight's and Lightbourne's NPIs for services that were never
4 actually provided. Defendants knew that false claims data showing Kae's as
5 the billing provider and Knight and Lightbourne as the rendering providers
6 were being transmitted to Medicaid, and subsequent payment for these false
7 claims was being deposited into Kae's bank account. The name of the billing
8 provider and rendering provider are material to Medicaid's reimbursing a
9 provider for services allegedly rendered to Medicaid recipients. Medicaid
10 relied on Defendants' material misrepresentations that Knight and/or
11 Lightbourne were the rendering providers and that services were actually
12 rendered when it reimbursed Kae's for services allegedly provided to Medicaid
13 recipients through Kae's;

14 AND/OR

15 (iii) submitting or causing the submission of false back billed claims to
16 Medicaid for payment asserting that services were provided to Medicaid
17 recipients through Kae's when those services were never provided.
18 Defendants knew the services were not rendered and still submitted or caused
19 the submission of said false claims. The recipients under whose Medicaid ID
20 numbers Defendants submitted false claims included: R.C. (Medicaid ID
21 000XXXXX198; DOB 10/XX/1962), B.H. (Medicaid ID 000XXXXX586; DOB
22 12/XX/1958), W.M. (Medicaid ID 672XXXXX005; DOB 09/XX/1949), G.S.
23 (Medicaid ID 000XXXXX010; DOB 11/XX/1959), W.W. (Medicaid ID
24 000XXXXX468; DOB 09/XX/1958), and C.T. (Medicaid ID 000XXXXX833;
25 DOB 12/XX/1979).

26 **70.** Defendants made or caused to be made said material misrepresentations with
27 the intent to deprive Medicaid of \$100,000 or more. As a result, Defendants obtained
28 \$100,000 or more through Kae's.

1 All of which was committed in Clark County, Nevada, aggregating an amount
2 greater than or equal to \$100,000, and constitutes a Category B Felony in violation of NRS
3 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e).

4 **COUNTS 26-27**
5 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION**
6 **OF AN OLDER PERSON FOR UNLAWFUL PURPOSE**
7 **Category B Felony – NRS 205.463(1) and NRS 205.463(3)(a)**

8 **71.** The allegations contained in Counts 1 through 25 and 28 through 70 are
9 hereby realleged and incorporated herein by reference as if fully set forth in this count and
10 described in detail below.

11 **72.** Defendant LARRY CARTER, through the operation of Kae's, from on or about
12 December 26, 2017 through on or about December 31, 2020, in Clark County, Nevada,
13 either personally or through his Umbrella associates, did knowingly and willfully obtain,
14 or directly or indirectly, aid, abet, counsel, encourage, hire, command, induce or otherwise
15 procure another to obtain personal identifying information of another person who is 60
16 years of age or older, and with the intent to commit an unlawful act, used the personal
17 identifying information for an unlawful purpose, to wit:

18 **73.** Defendant knowingly obtained the names, dates of birth, Medicaid account
19 numbers, and/or additional personal identifying information of Medicaid recipients who are
20 60 years of age or older, and with the intent to commit an unlawful act, namely Medicaid
21 fraud and/or theft as detailed in Counts 17 through 23 and 25 of this Indictment, used the
22 personal identifying information of said Medicaid recipients in order to submit false
23 Medicaid claims and to obtain reimbursement from Medicaid for provision of services. The
24 Medicaid recipients that were over the age of 60 and whose personal identifying
25 information Defendants, through the operation of Kae's, obtained and used for an unlawful
26 purpose, as set forth above, are as follows:

Count	Medicaid Recipient	Medicaid ID #	Date of Birth
27 26	W.M.	672XXXXX005	09/XX/1949
28 27	W.W.	000XXXXX468	09/XX/1958

Count	Medicaid Recipient	Medicaid ID #	Date of Birth
28	R.C.	000XXXXX198	10/XX/1962
29	B.H.	000XXXXX586	12/XX/1958
30	G.S.	000XXXXX010	11/XX/1959

78. LARRY CARTER directed Umbrella associates to back bill for services that were not rendered and that they knew were not rendered, pursuant to a schedule and/or template, with the intention that Medicaid would rely on the misrepresentations and make payments to Defendant through Kae's.

All of which was committed in Clark County, Nevada, and constitutes a Category B Felony in violation of NRS 205.463(1).

**COUNTS 31-44
MONEY LAUNDERING**

Category C Felony – NRS 207.195(1)(a), NRS 207.195(4), and NRS 207.195(5)

79. The allegations contained in Counts 1 through 30 and 45 through 70 are hereby realleged and incorporated herein by reference as if fully set forth in this count and described in detail below.

80. From on or about June 18, 2018, through on or about September 11, 2019, in Clark County, Nevada, Defendant LARRY CARTER, through L & L Investments, while knowing that a monetary instrument or other property represents the proceeds of or is directly or indirectly derived from any unlawful activity, did conduct or attempt to conduct a financial transaction involving the monetary instrument with (1) the intent to further any unlawful activity; and/or (2) the knowledge that the transaction conceals the location, source, ownership, or control of the instrument or other property, to wit:

81. While knowing that monetary instruments represented proceeds of, or were directly or indirectly derived from, any unlawful activity, namely Medicaid fraud, theft, and/or perjury, as detailed in Counts 17 through 23 and 25 of this Indictment, and knowing that conducting financial transactions with said instruments concealed the source, ownership, or control of the instruments, Defendant LARRY CARTER, through L & L Investments, willfully, unlawfully, and feloniously conducted or attempted to conduct transactions, nonetheless, involving the instruments by: (1) depositing or accepting money

1 in the form of checks made payable to L & L Investments for Defendant's involvement in
 2 the unlawful activity, and/or (2) writing and/or issuing checks from the L & L Investments
 3 bank account. With each transaction of \$5,000 or more constituting a separate violation,
 4 the transactions are as follows:

COUNT	APPROXIMATE DATE(S)	AMOUNT	DESCRIPTION
31	June 18, 2018	\$6,320.00	Cashier's check deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with "Remitter (Purchased By): "KAES CUBE OF LIFE LLC"
32	July 10, 2018, through September 11, 2019	\$55,201.69	24 checks from Kae's deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657
33	July 27, 2018	\$22,525.58	Cashier's check deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with "Remitter (Purchased By): KAES CUBE OF LIFE LLC"
34	October 9, 2018	\$5,279.15	Cashier's check deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with "Remitter (Purchased By): KAES CUBE OF LIFE LLC"
35	October 26, 2018	\$6,133.17	Cashier's check deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with "Remitter (Purchased By): KAES CUBE OF LIFE LLC"
36	November 23, 2018	\$6,398.38	Check from Kae's deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657
37	December 4, 2018	\$2,790.00	Withdrawal by LARRY CARTER from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657

COUNT	APPROXIMATE DATE(S)	AMOUNT	DESCRIPTION
38	February 23, 2019	\$7,500.00	Check from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 issued to First American Title with Memo: "Deposit Lot 32"
39	March 12, 2019	\$1,562.00	Check from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 issued to 6600 West Charleston LLC
40	March 27, 2019	\$9,083.34	Check from Kae's deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657
41	April 4, 2019	\$25,000.00	Withdrawal by LARRY CARTER from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657
42	April 19, 2019	\$12,500.00	Check from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 issued to Ariell Dix with memo: "Consultant"
43	August 5, 2019	\$13,538.00	Check from Kae's deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657
44	August 31, 2019	\$75,866.72	Check from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 issued to Reno Buick GMC Cadillac with memo: "Transportation"

82. Said transactions involved Wells Fargo Bank account number ending in #8657, of which Defendant LARRY CARTER is the signer and controlling person on the bank account through which money earned from Medicaid fraud was moved.

All of which was committed in Clark County, Nevada, and constitutes a Category C Felony in violation of NRS 207.195(1)(a), NRS 207.195(4), and NRS 207.195(5).

///

1 recipients, a number of which were over the age of 60, through Kae's, when Defendants
2 knew the services were never provided. As a result of Defendants' repeated fraudulent
3 conduct involving making false statements, false representations, and/or omissions of
4 material facts that Defendants knew were false and that Defendants intended for Medicaid
5 to rely on, Medicaid ultimately relied on those false statements, false representations, and
6 omissions of material facts and suffered a loss of more than \$1,200.

7 All of which was committed in Clark County, Nevada, and constitutes a Category B
8 Felony in violation of NRS 205.377.

9 **COUNT 46**

10 **SUBMITTING FALSE STATEMENTS: MEDICAID FRAUD**

11 **Category D felony – NRS 422.530, NRS 422.540(1)(d), and NRS 422.540(2)(a)**

12 **86.** The allegations contained in Counts 1 through 45 and 47 through 70 are
13 hereby realleged and incorporated herein by reference as if fully set forth in this count and
14 described in detail below.

15 **87.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
16 Paradigm Shift and pursuant to NRS 422.530, from on or about November 15, 2018,
17 through on or about March 11, 2020, in Clark County, Nevada, pursuant to a continuing
18 course of conduct and with the intent to defraud, made and/or caused false statements or
19 representations to be made for use in qualifying as a provider when Defendants knew said
20 statements or representations were false, in whole or in part, by commission or omission,
21 and which resulted in payment to Defendants in an aggregate amount greater than or equal
22 to \$650, to wit:

23 **88.** Defendants, pursuant to NRS 422.530 and a continuing course of conduct,
24 knowingly and with the intent to defraud Medicaid made and/or caused false statements
25 or representations to be made to Medicaid by:

- 26 (i) failing to disclose that L & L Investments, LARRY CARTER, LEASA
27 CARTER, Joseph Thomas (Thomas), and/or Corey Whiteside (Whiteside) were
28 owners, agents, managing employees, and/or persons with controlling interest
in Paradigm Shift;

1 AND/OR

2 (ii) failing to disclose that three of Paradigm Shift's owners, agents, managing
3 employees, and/or persons with controlling interest in Paradigm Shift had
4 criminal histories and/or were excluded from participating in any Medicaid-
5 contracted companies. Namely, LARRY CARTER and Thomas had criminal
6 histories that were not disclosed on the Medicaid application, and LARRY
7 CARTER and LEASA CARTER were excluded and prohibited from
8 participating in Medicaid.

9 **89.** Such information was required to be disclosed in enrollment applications and
10 other documentation to qualify to become a Medicaid-contracted provider. Defendants
11 either submitted or caused the submission of said false information to Medicaid through
12 Paradigm Shift knowing that the application and documentation contained false
13 statements or representations. As a result, Defendants obtained or sought to obtain an
14 aggregate amount greater than or equal to \$650.

15 All of which was committed in Clark County, Nevada, aggregating an amount
16 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
17 422.540(1)(d) and NRS 422.540(2)(a).

18 **COUNT 47**
19 **PERJURY**

20 **Category D Felony – NRS 422.530 and NRS 422.550(2)**

21 **90.** The allegations contained in Counts 1 through 46 and 48 through 70 are
22 hereby realleged and incorporated herein by reference as if fully set forth in this count and
23 described in detail below.

24 **91.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
25 Paradigm Shift and pursuant to NRS 422.530, from on or about November 15, 2018,
26 through on or about March 11, 2020, in Clark County, Nevada, did sign or submit, or cause
27 to be signed or submitted, a statement within an application submitted to Medicaid to
28 participate as a provider indicating that all matters contained therein were true and
accurate under the pains and penalties of perjury, knowing that the application, report or

1 **94.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
2 Paradigm Shift, from on or about November 15, 2018, through on or about March 11, 2020,
3 in Clark County, Nevada, did, without lawful authority and pursuant to a scheme or
4 continuing course of conduct, knowingly obtain personal property of another person by a
5 material misrepresentation with the intent to deprive that person of the property, where
6 the aggregate value of said property was \$100,000 or more, to wit:

7 **95.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
8 Paradigm Shift, obtained \$100,000 or more from Medicaid, through Paradigm Shift, by
9 knowingly:

10 (i) failing to disclose to Medicaid that LARRY CARTER, Thomas, and/or
11 LEASA CARTER were owners, agents, managing employees, and/or persons
12 with controlling interest in Paradigm Shift. Said information was material to
13 Paradigm Shift being approved by Medicaid to become a Medicaid-contracted
14 provider, as LARRY CARTER and LEASA CARTER were excluded from
15 participating in the Medicaid program, and/or LARRY CARTER and Thomas
16 had criminal convictions that, if properly disclosed, would have prevented
17 Paradigm Shift from becoming a Medicaid-contracted provider;

18 AND/OR

19 (ii) submitting claims or causing the submission of claims to Medicaid for
20 payment under Paradigm Shift's NPI for services that were not actually
21 provided through Paradigm Shift. Defendants knew that false claims data
22 showing Paradigm Shift as the billing provider were being transmitted to
23 Medicaid, and subsequent payment for these false claims was being deposited
24 into Paradigm Shift's bank account. The name of the billing provider and
25 rendering provider are material to Medicaid's reimbursing a provider for
26 services allegedly rendered to Medicaid recipients. Medicaid relied on
27 Defendants' material misrepresentations that Paradigm Shift was the billing
28 provider when it reimbursed Paradigm Shift for services allegedly provided to

1 Medicaid recipients through Paradigm Shift. Defendants also alleged that
2 Natalie Jaspers (Jaspers) and LaTeisha Morgan (Morgan) provided services
3 through Paradigm Shift when Jaspers and Morgan denied providing said
4 services, denied working for Paradigm Shift, and denied even recognizing the
5 name of the company;

6 AND/OR

7 (iii) submitting or causing the submission of false back billed claims to
8 Medicaid for payment asserting that services were provided to Medicaid
9 recipients through Paradigm Shift when those services were never provided.
10 Defendants knew the services were not rendered and still submitted or caused
11 the submission of said false claims. The recipients under whose Medicaid ID
12 numbers Defendants submitted false claims included: L.B. (Medicaid ID
13 000XXXXX657; DOB 11/XX/1958), T.T. (Medicaid ID 000XXXXX447; DOB
14 02/XX/1957), A.H. (Medicaid ID 000XXXXX282; DOB 06/XX/1958), M.A.
15 (Medicaid ID 000XXXXX182; DOB 07/XX/1973), and L.K. (Medicaid ID
16 674XXXXX010; DOB 01/XX/1998).

17 **96.** Defendants made or caused to be made said material misrepresentations with
18 the intent to deprive Medicaid of \$100,000 or more. As a result, Defendants obtained
19 \$100,000 or more through Paradigm Shift

20 All of which was committed in Clark County, Nevada, aggregating an amount
21 greater than or equal to \$100,000, and constitutes a Category B Felony in violation of NRS
22 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e).

23 **COUNT 49**

24 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**

25 **Category D Felony – NRS 422.530, NRS 422.540(1)(a), and NRS 422.540(2)(a)**

26 **97.** The allegations contained in Counts 1 through 48 and 50 through 70 are
27 hereby realleged and incorporated herein by reference as if fully set forth in this count and
28 described in detail below.

///

1 representations to be made for use in obtaining or seeking to obtain authorization to
2 provide specific goods or services, knowing the statements or representations to be false, in
3 whole or in part, by commission or omission, and which resulted in payment to Defendants
4 in an aggregate amount greater than or equal to \$650, to wit:

5 **102.** Defendants, pursuant to NRS 422.530 and a continuing course of conduct,
6 knowingly and with the intent to defraud Medicaid made and/or caused false statements
7 or representations to be made to Medicaid that Medicaid-contracted provider Jaspers
8 agreed to be linked to the group provider, Paradigm Shift, when Jaspers denied ever
9 working for or even recognizing the name of the company, Paradigm Shift. Defendants
10 knew Jaspers did not authorize Defendants to submit said documentation because Jaspers
11 never worked for Paradigm Shift. As a result, Defendants obtained or sought to obtain an
12 aggregate amount greater than or equal to \$650.

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

16 **COUNT 51**
17 **PERJURY**

18 **Category D Felony – NRS 422.530 and NRS 422.550(2)**

19 **103.** The allegations contained in Counts 1 through 50 and 52 through 70 are
20 hereby realleged and incorporated herein by reference as if fully set forth in this count and
21 described in detail below.

22 **104.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
23 Paradigm Shift and pursuant to NRS 422.530, from on or about November 15, 2018,
24 through on or about March 11, 2020, in Clark County, Nevada, did sign or submit, or cause
25 to be signed or submitted, a statement within an application submitted to Medicaid to
26 participate as a provider indicating that all matters contained therein were true and
27 accurate under the pains and penalties of perjury, knowing that the application, report or
28 invoice contained false information, in whole or in part, by commission or by omission, to
wit:

1 agreed to be linked to the group provider, Paradigm Shift, when Morgan denied ever
2 working for or even recognizing the name of the company, Paradigm Shift. Defendants
3 knew Morgan did not authorize Defendants to submit said documentation because Morgan
4 never worked for Paradigm Shift. As a result, Defendants obtained or sought to obtain an
5 aggregate amount greater than or equal to \$650.

6 All of which was committed in Clark County, Nevada, aggregating an amount
7 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
8 422.540(1)(b) and NRS 422.540(2)(a).

9 **COUNT 54**

10 **PERJURY**

11 **Category D Felony – NRS 422.530 and NRS 422.550(2)**

12 **112.** The allegations contained in Counts 1 through 53 and 55 through 70 are
13 hereby realleged and incorporated herein by reference as if fully set forth in this count and
14 described in detail below.

15 **113.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
16 Paradigm Shift and pursuant to NRS 422.530, from on or about November 15, 2018,
17 through on or about March 11, 2020, in Clark County, Nevada, did sign or submit, or cause
18 to be signed or submitted, a statement within an application submitted to Medicaid to
19 participate as a provider indicating that all matters contained therein were true and
20 accurate under the pains and penalties of perjury, knowing that the application, report or
21 invoice contained false information, in whole or in part, by commission or by omission, to
22 wit:

23 **114.** Defendants, pursuant to NRS 422.530, submitted or caused to be submitted
24 an application linking Medicaid-contracted provider Morgan to the group provider,
25 Paradigm Shift, knowing that the application falsely indicated that Morgan authorized
26 Defendants to link her to the group provider. The application contained a declaration,
27 signed under penalty of perjury, that the information in the application and any
28 attachments were true, accurate, and complete. Defendants signed or submitted, or caused
to be signed or submitted, the declaration under penalty of perjury attesting that all

1 matters stated within the application and documentation were true and accurate knowing
2 that the application and documentation contained false information. Subsequently, and in
3 reliance on the false information contained within the application and documentation
4 submitted by Defendants, Morgan was linked to Paradigm Shift, and Paradigm Shift was
5 authorized to receive reimbursement from Medicaid for services allegedly provided by
6 Morgan to Medicaid recipients.

7 All of which was committed in Clark County, Nevada, and constitutes a Category D
8 Felony in violation of NRS 422.550(2).

9 **COUNT 55**
10 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
11 **Category D Felony – NRS 422.530, NRS 422.540(1)(a), and NRS 422.540(2)(a)**

12 **115.** The allegations contained in Counts 1 through 54 and 56 through 70 are
13 hereby realleged and incorporated herein by reference as if fully set forth in this count and
14 described in detail below.

15 **116.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
16 Paradigm Shift and pursuant to NRS 422.530, from on or about November 15, 2018,
17 through on or about March 11, 2020, in Clark County, Nevada, pursuant to a scheme or
18 continuing course of conduct and with the intent to defraud, made and/or caused false
19 claims to be made to Medicaid for payment, when Defendants knew said claims were false,
20 and which resulted in payment to Defendants in an aggregate amount greater than or equal
21 to \$650, to wit:

22 **117.** Defendants pursuant to NRS 422.530 and a continuing course of conduct,
23 knowingly and with the intent to defraud Medicaid made and/or caused the submission of
24 false claims to Medicaid for payment asserting that services were provided to Medicaid
25 recipients through Paradigm Shift when those services were never provided. Defendants,
26 through Paradigm Shift, submitted claims to Medicaid for services allegedly provided to
27 Medicaid recipients months before they allegedly became Paradigm Shift clients.
28 Defendants knew the services were not rendered and still submitted or caused the
submission of said false claims. The recipients under whose Medicaid ID numbers

1 Defendants submitted false claims included: L.B. (Medicaid ID 000XXXXX657; DOB
2 11/XX/1958), T.T. (Medicaid ID 000XXXXX447; DOB 02/XX/1957), A.H. (Medicaid ID
3 000XXXXX282; DOB 06/XX/1958), M.A. (Medicaid ID 000XXXXX182; DOB 07/XX/1973),
4 and L.K. (Medicaid ID 674XXXXX010; DOB 01/XX/1998). As a result of the submission of
5 the false claims, Defendants obtained and/or sought to obtain \$650 or more from Medicaid.

6 All of which was committed in Clark County, Nevada, aggregating an amount
7 greater than or equal to \$650, and constitutes a Category D Felony in violation of NRS
8 422.540(1)(a) and NRS 422.540(2)(a).

9 **COUNT 56**
10 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
11 **Gross Misdemeanor – NRS 422.570(1)**

12 **118.** The allegations contained in Counts 1 through 55 and 57 through 70 are
13 hereby realleged and incorporated herein by reference as if fully set forth in this count and
14 described in detail below.

15 **119.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
16 Paradigm Shift, from on or about November 15, 2018, through on or about January 28,
17 2021, in Clark County, Nevada, upon submitting a claim for or upon receiving payment for
18 goods or services pursuant to the State Plan for Medicaid (Plan), did intentionally fail to
19 maintain such records as are necessary to disclose fully the nature of the goods or services
20 for which the claim was submitted or payment was received for at least five (5) years after
21 the date on which payment was received. The actions occurred as part of Defendants'
22 routine business practices/scheme or continuing course of conduct, to wit:

23 **120.** Defendants intentionally failed to maintain accurate documentation,
24 including progress notes and service documentation, concerning the services, quantity of
25 services, and/or names of rendering service providers who actually provided services to
26 Medicaid recipients. In many instances, Defendants failed to maintain any records at all to
27 support claims submitted for reimbursement from Medicaid. Defendants knew these
28 records were required to support and substantiate any and all claims submitted for
reimbursement from Medicaid. Defendants subsequently obtained payment for such

1 claimed services.

2 All of which was committed in Clark County, Nevada, and constitutes a Gross
3 Misdemeanor in violation of NRS 422.570(1).

4 **COUNTS 57-59**
5 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION**
6 **OF AN OLDER PERSON FOR UNLAWFUL PURPOSE**
7 **Category B Felony – NRS 205.463(1) and NRS 205.463(3)(a)**

8 **121.** The allegations contained in Counts 1 through 56 and 60 through 70 are
9 hereby realleged and incorporated herein by reference as if fully set forth in this count and
described in detail below.

10 **122.** LARRY CARTER, through the operation of Paradigm Shift, from on or about
11 November 15, 2018, through on or about March 11, 2020, in Clark County, Nevada, either
12 personally or through his Umbrella associates, did knowingly and willfully obtain, or
13 directly or indirectly, aid, abet, counsel, encourage, hire, command, induce or otherwise
14 procure another to obtain personal identifying information of another person who is 60
15 years of age or older, and with the intent to commit an unlawful act, used the personal
16 identifying information for an unlawful purpose, to wit:

17 **123.** LARRY CARTER knowingly obtained the names, dates of birth, Medicaid
18 account numbers, and/or additional personal identifying information of Medicaid recipients
19 who are 60 years of age or older, and with the intent to commit an unlawful act, namely
20 Medicaid fraud and/or theft as detailed in Counts 46 through 55 of this Indictment, used
21 the personal identifying information of said Medicaid recipients in order to submit false
22 Medicaid claims and to obtain reimbursement from Medicaid for provision of services.
23 Medicaid-contracted service providers, who Defendant alleged rendered services to
24 Medicaid recipients, denied rendering said services, and Defendant knew that such services
25 were not actually provided by the various service providers on behalf of Paradigm Shift.
26 Additionally, Defendant, through Paradigm Shift, submitted claims to Medicaid for
27 services allegedly provided to Medicaid recipients months before they allegedly became
28 Paradigm Shift clients. The Medicaid recipients that were over the age of 60 and whose

1 personal identifying information Defendant obtained and used for an unlawful purpose, as
2 set forth above, are as follows:

Count	Medicaid Recipient	Medicaid ID #	Date of Birth
57	L.B	000XXXXX657	11/XX/1958
58	T.T.	000XXXXX447	02/XX/1957
59	A.H.	000XXXXX282	06/XX/1958

7 124. LARRY CARTER directed his Umbrella associates to use personal identifying
8 information of Medicaid recipients to back bill for services that he knew were never
9 provided, pursuant to a schedule and/or template, with the intention that Medicaid would
10 rely on the misrepresentations and make payments to Defendant through Paradigm Shift.
11 At LARRY CARTER'S direction, Umbrella associates submitted said false claims using
12 personal identifying information of Medicaid recipients knowing that the claims were false,
13 which resulted in Medicaid making payments to Defendant through Paradigm Shift.

14 All of which was committed in Clark County, Nevada, and constitutes a Category B
15 Felony in violation of NRS 205.463(1) and NRS 205.463(3)(a).

16 **COUNTS 60-61**
17 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION**
18 **OF ANOTHER PERSON FOR UNLAWFUL PURPOSE**
19 **Category B Felony – NRS 205.463(1)**

20 125. The allegations contained in Counts 1 through 59 and 62 through 70 are
21 hereby realleged and incorporated herein by reference as if fully set forth in this count and
22 described in detail below.

23 126. Defendant LARRY CARTER, through the operation of Paradigm Shift, from
24 on or about November 15, 2018, through on or about March 11, 2020, in Clark County,
25 Nevada, either personally or through his Umbrella associates, did knowingly and willfully
26 obtain, or directly or indirectly, aid, abet, counsel, encourage, hire, command, induce or
27 otherwise procure another to obtain personal identifying information of another person,
28 and with the intent to commit an unlawful act, used the personal identifying information
for an unlawful purpose, to wit:

1 **130.** From on or about August 6, 2019, through on or about September 6, 2019, in
 2 Clark County, Nevada, Defendant LARRY CARTER, through L & L Investments, while
 3 knowing that a monetary instrument or other property represents the proceeds of or is
 4 directly or indirectly derived from any unlawful activity, did conduct or attempt to conduct
 5 a financial transaction involving the monetary instrument with (1) the intent to further
 6 any unlawful activity; and/or (2) the knowledge that the transaction conceals the location,
 7 source, ownership, or control of the instrument or other property, to wit:

8 **131.** Defendant LARRY CARTER, through L & L Investments, while knowing that
 9 monetary instruments represented proceeds of, or were directly or indirectly derived from,
 10 any unlawful activity, namely Medicaid fraud, theft, and/or perjury, as detailed in Counts
 11 46 through 55 of this Indictment, willfully, unlawfully, and feloniously conducted or
 12 attempted to conduct transactions involving the instruments by: (1) receiving and/or
 13 depositing money in the form of checks made payable to L & L Investments for Defendant's
 14 involvement in the unlawful activity, and/or (2) writing and/or issuing checks from the L &
 15 L Investments bank account, knowing that said transactions concealed the source,
 16 ownership, or control of the instruments. The transactions are as follows:

COUNT	APPROXIMATE DATE	AMOUNT	DESCRIPTION
62	August 6, 2019	\$10,934.81	Cashier's Check deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with Remitter: "Paradigm Shift Health Services L.L.C." (withdrawn from Paradigm Shift Chase Bank account ending in #5652)
63	August 8, 2019	\$9,944.44	Check from Paradigm Shift Wells Fargo Bank account ending #4645 deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with memo: "% Payment"

COUNT	APPROXIMATE DATE	AMOUNT	DESCRIPTION
64	August 8, 2019	\$2,647.28	Check from Paradigm Shift JP Morgan Chase account ending in #5652 deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with memo: "% Payment"
65	August 13, 2019	\$17,300.00	Check from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 issued to Ariell Dix with memo: "Consultant"
66	August 16, 2019	\$2,083.72	Check from Paradigm Shift JP Morgan Chase account ending in #5652 deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with memo: "% Payment"
67	August 23, 2019	\$8,128.47	Check from Paradigm Shift Wells Fargo Bank account ending in #4645 deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657
68	August 27, 2019	\$13,000.00	Check from LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 issued to Dale Henson's Henson Holdings account with memo: "Consulting"
69	September 6, 2019	\$2,748.34	Check from Paradigm Shift JP Morgan Chase bank account ending in #5652 deposited into LARRY CARTER'S L & L Investments Wells Fargo Bank account ending in #8657 with memo: "% Payment (PS)"

132. Said transactions involved Wells Fargo Bank account number ending in #8657, in the name of L & L Investments, in which Defendant LARRY CARTER is a signer and controlling person on the bank account through which money earned from Medicaid fraud was moved.

All of which was committed in Clark County, Nevada, and constitutes a Category C Felony in violation of NRS 207.195(1)(a), NRS 207.195(4), and NRS 207.195(5).

///

1 **COUNT 70**
2 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**
3 **IN COURSE OF ENTERPRISE OR OCCUPATION**
4 **Category B Felony – NRS 205.377**

5 **133.** The allegations contained in Counts 1 through 69 are hereby realleged and
6 incorporated herein by reference as if fully set forth in this count and described in detail
7 below.

8 **134.** Defendants LARRY CARTER and LEASA CARTER, through the operation of
9 Paradigm Shift, from on or about November 15, 2018, through on or about March 11, 2020,
10 in Clark County, Nevada, did, in the course of an enterprise or occupation, knowingly and
11 with the intent to defraud, engage in an act, practice or course of business or employ a
12 device, scheme or artifice which operated or would have operated as a fraud or deceit upon
13 a person by means of a false representation or omission of a material fact that: (a) the
14 person knew to be false or omitted; (b) the person intended another to rely on; and (c)
15 resulted in a loss to any person who relied on the false representation or omission, in at
16 least two transactions that had the same or similar pattern, intents, results, accomplices,
17 victims or methods of commission, or were otherwise interrelated by distinguishing
18 characteristics and were not isolated incidents within four years and in which the
19 aggregate loss or intended loss was more than \$1,200, to wit:

20 **135.** In the course of their enterprise or occupation through Paradigm Shift,
21 Defendants knowingly and with the intent to defraud engaged in a Medicaid fraud
22 operation involving Medicaid fraud, theft, and/or perjury, and which operated as a fraud
23 upon Medicaid. Defendants' continuous course of conduct over the course of approximately
24 16 months involved at least two instances or transactions of: (1) submitting false
25 statements or representations to be used in qualifying as a provider when Defendants knew
26 the statements or representations were false; (2) submitting false statements or
27 representations, under penalty of perjury, for use in obtaining authorization to provide
28 services to Medicaid recipients when Defendants knew the statements or representations
were false; and/or (3) submitting false claims alleging services were provided to Medicaid

1 recipients, a number of which were over the age of 60, through Paradigm Shift, when
2 Defendants knew the services were never provided. As a result of Defendants' repeated
3 fraudulent conduct involving making false statements, false representations, and/or
4 omissions of material facts that Defendants knew were false and that Defendants intended
5 for Medicaid to rely on, Medicaid ultimately relied on those false statements, false
6 representations, and omissions of material facts and suffered a loss of more than \$1,200.

7 All of which was committed in Clark County, Nevada, and constitutes a Category B
8 Felony in violation of NRS 205.377.

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

11 DATED this 22nd day of April 2026.

12 AARON D. FORD
13 Attorney General

14 By:

15 
16 BEHNAZ SALIMIAN MOLINA (Bar No. 13752)
17 Senior Deputy Attorney General

18 ENDORSEMENT: A True Bill

19 
20 _____
21 Foreperson, Clark County Grand Jury
22
23
24
25
26
27
28