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IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, STATE OF NEVADA

THE STATE OF NEVADA,

Plaintiff,

vs.

YOSELIN ELIZABETH SORTO MEJIA,
AGID01276,
and
SALVI THERAPEUTICS LTD,
AGID01277

Defendants.

JC CASE NO: 26-CR-055065-001

Case No. JC DEPT NO: 03

Dept. No.

AG Case No.: 103725-053.01

CRIMINAL COMPLAINT

The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada Attorney General, and Steven Sidhu, Senior Deputy Attorney General, complains and declares, upon information, belief and/or personal knowledge that:

Defendants YOSELIN ELIZABETH SORTO MEJIA ("MEJIA") and SALVI THERAPEUTICS LTD ("SALVI"), a Nevada limited liability company, at the times stated herein, in Las Vegas Township, County of Clark, State of Nevada, each committed the offenses of:

- **SUBMITTING FALSE MEDICAID CLAIMS**, a category D felony violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), four (4) counts [NOC 56141]; and
- **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**, a gross

1 misdemeanor violation of NRS 422.570, one (1) count [NOC 51568].

2 MEJIA, at times stated herein, additionally having committed the offenses of:

- 3 • **THEFT IN THE AMOUNT OF \$100,000 OR MORE**, a category B felony
4 violation of NRS 205.0832(1)(c) and NRS 205.0835(2)(e), one (1) count [NOC
5 61963]; and
- 6 • **MONEY LAUNDERING**, a category C felony violation of NRS 207.195(1)(a),
7 NRS 207.195(4), and NRS 207.195(5), four (4) counts [NOC 61694].

8 Defendants committed said offenses against the State of Nevada, Nevada Medicaid
9 Division (hereinafter "Medicaid") in the following manner:

10 From on or about April 20, 2023 forward, SALVI maintained an agreement with
11 Medicaid to be a provider of services or goods. Under the agreement with Medicaid, SALVI
12 is considered a Provider Type 24, an Advanced Practice Registered Nurse ("APRN")
13 provider. SALVI's National Provider Identifier (NPI) is 1578258281. MEJIA was identified
14 as the purported 100% owner of SALVI. MEJIA, was authorized to act on SALVI's behalf,
15 and had the requisite authority and/or responsibility pursuant to NRS 422.530. At all times
16 pertinent to these allegations, Defendant MEJIA was the operator of SALVI.

17 At all times pertinent to these allegations, SALVI maintained a business and/or
18 practice location at 1817 Weldon Place, Las Vegas, Nevada 89104, which is located in Clark
19 County. At all times pertinent to these allegations, the SALVI location was where: (1)
20 services were purportedly provided to Medicaid recipients through SALVI; (2) claims with
21 Medicaid recipient information were submitted to Medicaid for payment for services
22 purportedly provided through SALVI; (3) records for services purportedly provided to
23 Medicaid recipients through SALVI were allegedly maintained; and/or (4) MEJIA, through
24 the operation of SALVI, submitted claims to Medicaid for payment.

25 From on or about May 1, 2023, through on or about February 13, 2025, Defendants
26 SALVI and MEJIA, through the operation of SALVI and pursuant to a continuing course
27 of conduct, made and/or caused false claims to be made to Medicaid for payment under the
28 Medicaid ID numbers of several Medicaid recipients for services purportedly provided by

1 various servicing providers on behalf of SALVI. Through these claims, SALVI and MEJIA
2 represented that its service providers, including Mylene Agreda, rendered certain
3 behavioral health services that the provider denied providing and/or the services
4 represented an impossible number of daily patients.

5 SALVI acted through the actions of MEJIA, and MEJIA intended, at least in part,
6 that their actions benefit SALVI. As a result of the submission of said claims, SALVI and/or
7 MEJIA obtained or sought to obtain payment from Medicaid.

8 Pursuant to the Medicaid Services Manual, SALVI is required to maintain
9 appropriate records to support the claims submitted to Medicaid. In response to the Nevada
10 Attorney General's Office, Medicaid Fraud Control Unit's requests for records SALVI failed
11 to produce client files and other documentation necessary to fully support claims submitted
12 to Nevada Medicaid for payment.

13 Records from Wells Fargo Bank and JP Morgan Chase Bank list MEJIA as a signer
14 on both accounts, having full authority to make deposits, withdrawals, and changes to the
15 SALVI Wells Fargo Bank account ending in 1904 and the JP Morgan Chase Bank account
16 ending in 9378. The foregoing bank accounts are where SALVI and MEJIA requested that
17 Medicaid electronically deposit money.

18 As a result of Defendants' actions regarding submission of false claims to Medicaid,
19 from on or about January 1, 2024, through on or about May 14, 2025, Defendants SALVI
20 and MEJIA received a total of more than \$2,100,000 from Medicaid. Said funds were
21 deposited electronically into the SALVI Wells Fargo Bank account ending in 1904 and the
22 JP Morgan Chase Bank account ending in 9378.

23 Whereas the above-noted allegations being stated against Defendants, the State
24 brings the following charges:

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COUNT ONE
Against MEJIA and SALVI
SUBMITTING FALSE CLAIMS: MEDICAID FRAUD
[NRS 422.540(1)(a) and NRS 422.540(2)(a) Felony, Category D]

Defendants MEJIA and SALVI, and each of them, through a scheme or continuous course of conduct, with intent to defraud, knowingly and intentionally made false claims or caused false claims to be made for payment from Medicaid, in an aggregate amount greater than or equal to \$650:

From on or about May 1, 2023, through on or about February 13, 2025, in Clark County, Nevada, Defendants MEJIA and SALVI submitted claims to Medicaid asserting that specific services were provided to the Medicaid recipients by its service providers, including Mylene Agreda, a healthcare professional employed by SALVI, and requested reimbursement for provision of services. Defendants knew that such services were not actually provided as Mylene Agreda denied providing the services. The Medicaid recipients did not receive the specific services from SALVI that Defendants claimed were delivered to such recipients.

Defendants MEJIA and SALVI did in fact make false claims to Medicaid, resulting in payment from Medicaid in an amount greater than or equal to \$650. All of which was committed in Clark County and constitutes a category D felony in violation of NRS 422.540.

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COUNT TWO
Against MEJIA and SALVI
INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS
[NRS 422.570(1) Gross Misdemeanor]

Defendant SALVI, upon submitting a claim for or upon receiving payment for goods or services pursuant to Medicaid, intentionally failed to maintain such records, for at least 5 years after the date on which payment was received, as are necessary to disclose fully the nature of the goods or services for which the claims were submitted or payment received, to wit:

From on or about May 1, 2023, through on or about February 13, 2025, Defendant SALVI intentionally failed to maintain accurate documentation, including progress notes

1 and service documentation, concerning the services or quantities of services actually
2 provided by its healthcare professionals to the Medicaid recipients. Defendant knew these
3 records were used as a basis for claims submitted for reimbursement from Medicaid.
4 Defendant subsequently obtained payment for such claimed services. All of Defendants'
5 records relating to services purportedly provided to deceased Medicaid recipients were
6 missing.

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

9 **COUNT THREE**
10 **Against MEJIA**
11 **THEFT**

12 **[NRS 205.0832(1)(c) and 205.0835(2)(e) Felony, Category B]**

13 Defendant MEJIA, through a scheme or continuous course of conduct, without lawful
14 authority, knowingly obtained property of another person by a material misrepresentation
15 with the intent to deprive the person of the property, where the aggregate value of said
16 property was \$100,000 or more to wit:

17 From on or about May 1, 2023, through on or about February 13, 2025, Defendant
18 obtained \$100,000 or more by knowingly submitting false claims to Medicaid for payment
19 asserting that specific services were provided to Medicaid recipients when those services
20 were not provided. Said information, namely whether those services were actually
21 provided, was material to Medicaid reimbursing Defendant for said services, and
22 Defendant made such material misrepresentations with the intent to deprive Medicaid of
23 \$100,000 or more by representing that the services were provided by SALVT's healthcare
24 professionals when, in fact, they were not, as the Medicaid recipients were deceased at the
25 time of the alleged services.

26 All of which was committed in Clark County and constitutes a category B felony
27 violation of NRS 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e).

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2 **COUNTS FOUR through SEVEN**

3 **Against MEJIA**

4 **MONEY LAUNDERING**

5 **[NRS 207.195(1)(a), 207.195(4), and 207.195(5) Felony, Category C]**

6 Defendant MEJIA, without lawful authority, did conduct or attempt to conduct a
7 financial transaction involving a monetary instrument knowing the monetary instrument
8 derived from unlawful activity, to wit

9 From on or about May 1, 2023, through on or about February 13, 2025, in Clark
10 County, Nevada, Defendant MEJIA, through SALVI, while knowing that a monetary
11 instrument or other property was directly or indirectly derived from any unlawful activity,
12 did conduct or attempt to conduct a financial transaction involving the monetary
13 instrument, to wit:

14 While knowing that funds in the SALVI bank accounts, for which Defendant MEJIA
15 is the signer, were derived from unlawful activity, namely Medicaid fraud and/or theft, as
16 detailed in Counts 1 and 3 of this Criminal Complaint, Defendant MEJIA, through SALVI,
17 willfully, unlawfully, and feloniously conducted or attempted to conduct transactions
18 involving the instruments by: (1) withdrawing or transferring money in the form of cash
19 withdrawals from the SALVI bank accounts, and/or (2) writing and/or issuing checks from
20 the SALVI bank accounts. With each transaction of \$5,000 or more constituting a separate
21 violation, the transactions are as follows:

COUNT	APPROXIMATE DATE(S)	AMOUNT	DESCRIPTION
4	August 5, 2024 Ex19p98	\$31,000.00	Cash withdrawal – MEJIA
5	August 9, 2024 Ex19p100	\$25,000.00	Cash withdrawal – MEJIA
6	November 1, 2024 p.112	\$38,000.00	Cash withdrawal – MEJIA
7	March 20, 2025 Ex30p20	\$12,000.00	Cash withdrawal – MEJIA

25 Said transactions involved SALVI's America First Credit Union account ending in
26 8645.

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

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

4 The complainant knows that said crimes occurred and that Defendants YOSELIN
5 ELIZABETH SORTO MEJIA and SALVI THERAPEUTICS LTD committed the same
6 based on the following: Because the complainant is an attorney in the employ of the Office
7 of the Nevada Attorney General and is in possession of, among other things, the Affidavit
8 of Probable Cause in Support of Criminal Complaint and Summons in Lieu of Arrest, and
9 said affidavit was filed contemporaneously herewith and supports the foregoing to be true.

10 The complainant therefore requests that a Summons in Lieu of Arrest Warrant be
11 issued for Defendant YOSELIN ELIZABETH SORTO MEJIA, in order that said Defendant
12 may be dealt with according to the laws of the State of Nevada.

13 The complainant further requests that a Summons in Lieu of Arrest be issued for
14 Defendant SALVI THERAPEUTICS LTD, in order that said Defendant may be dealt with
15 according to the laws of the State of Nevada.

16 Said complainant declares under penalty of perjury under the laws of the State of
17 Nevada that the foregoing is true and correct to the best of complainant's knowledge.

18 DATED this 9th day of June, 2026.

19 AARON D. FORD
20 Attorney General

21 By: 
22 STEVEN SIDHU (Bar. No. 7516)
23 Senior Deputy Attorney General
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