



1 **INFM**
AARON D. FORD
2 Attorney General
Andrew Schulke (Bar. No. 10218)
3 Chief Deputy Attorney General
State of Nevada
4 Office of the Attorney General
5175 South Durango Drive
5 Las Vegas, NV 89113
(702) 486-3420 (phone)
6 (702) 486-0460 (fax)
SSidhu@ag.nv.gov

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8 Attorneys for State of Nevada
(I.A. 06/15/2023, 8:30 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 Plaintiff,

13 vs.

14 **JOY BEHAVIORAL HEALTH, LLC,**

15 Defendant.

Case No. C-23-374528-1

Dept. No. XX

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
18 Attorney General, and ANDREW SCHULKE, Chief Deputy Attorney General, informs this
19 Honorable Court that JOY BEHAVIORAL HEALTH, LLC, the Defendant above named,
20 has committed the offense of **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**
21 **RECORDS**, a gross misdemeanor violation of NRS 422.570, one (1) count, as follows:

22 **COUNT I**

23 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
24 **[NRS 422.570(1), Gross Misdemeanor]**

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

1 to wit:

2 Defendants Joy Behavioral intentionally failed to maintain accurate documentation,
3 including progress notes and service documentation, concerning the services or quantities
4 of services actually provided by its healthcare professionals to Medicaid recipients.
5 Defendant Joy Behavioral knew these records were used as a basis for claims submitted
6 from on or about February 2020 to July 2022 for reimbursement from Medicaid. Defendant
7 Joy Behavioral subsequently obtained payment for such claimed services.

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

11 DATED this 9th day of June, 2023.

12 AARON D. FORD
13 Attorney General

14 By: /s/ Andrew Schulke
15 ANDREW SCHULKE (Bar. No. 10218)
16 Chief Deputy Attorney General
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