

CLERK OF THE COURT

1 **INFM**
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14 (I.A. 09/26/2013, 9:30 A.M.)

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

11 STATE OF NEVADA,)

12 Plaintiff,)

13 v.)

14 GARREN MORRIS,)
15 aka GARRIN MCCOY MORRIS)
16 ID NO. 1071855)

17 Defendant.)

Case No.: C-13-292553-1

Dept. No.: XXV

18 **INFORMATION**

19 The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO,
20 Nevada Attorney General, and Andrew Schulke, Sup. Senior Deputy Attorney General,
21 informs this Honorable Court that GARREN MORRIS aka GARRIN MCCOY MORRIS, the
22 Defendant above named, has committed the offense of Failure to Maintain Adequate
23 Records, a gross misdemeanor violation of NRS 422.570(1), one (1) count, in Clark County,
24 State of Nevada as follows:

25 **COUNT ONE**
26 **FAILURE TO MAINTAIN ADEQUATE RECORDS**
27 **[NRS 422.570(1) Gross Misdemeanor]**

28 Defendant, upon causing claims to be submitted or payment received pursuant to the
Nevada State Medicaid plan, did knowingly and intentionally fail to maintain such records as

1 are necessary to disclose fully the nature of the goods or services for which the claims were
2 submitted or payment was received for at least 5 years after the date on which payment was
3 received. The actions occurred as part of Defendant's routine business practices/scheme or
4 continuous course of conduct, to wit:

5 On or about February 2011 through July 2012, Defendant was employed as a
6 Contracted Treatment Consultant (CTC) by Unity Family Services, LLC (Unity). During times
7 stated herein, Unity was located at 3985 West Cheyenne Ave #306, North Las Vegas,
8 Nevada and 3840 N. Commerce Street #200, North Las Vegas, Nevada. Unity assigned
9 Medicaid recipients C.C. (Medicaid no. 00XXXXXX163) and A.L. (Medicaid No.
10 00XXXXXX886) as patients/clients for Defendant to provide behavioral health services. While
11 so employed, Defendant did knowingly fail to maintain accurate documentation, including
12 progress notes and time and attendance documents, concerning the behavioral health
13 services he allegedly provided to Medicaid recipients C.C. and A.L. Defendant knew these
14 records were used as a basis for claims submitted for reimbursement from Medicaid.
15 Defendant subsequently received payment for such claimed services. Defendant intentionally
16 failed to maintain accurate records that are necessary to fully disclose the nature of the
17 service for those claims. Many of Defendant's records did not note accurate or true dates,
18 times or length of services provided to the Medicaid recipients during time periods they were
19 incarcerated.

20 All of which was committed in the County of Clark, and constitutes a gross
21 misdemeanor violation of NRS 422.570(1).

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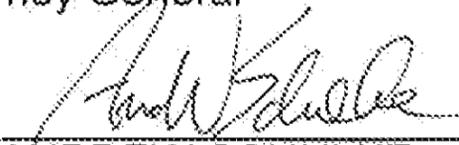
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1 All of which is contrary to the form, force and effect of the statutes in such cases made
2 and provided, and against the peace and dignity of the State of Nevada. Furthermore,
3 complainant makes this declaration subject to the penalty of perjury.

4 Dated this 13th day of September, 2013.

8 CATHERINE CORTEZ MASTO
9 Attorney General

10 By: 
11 ANDREW SCHULKE
12 Sup. Senior Deputy Attorney General
13 Medicaid Fraud Control Unit