

CLERK OF THE COURT

1 **INFM**
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14 (I.A. 10/21/2013, 1:30 P.M.)
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9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA,)
12) Plaintiff,) Case No.: C-13-293287-1
13) v.) Dept. No.: X
14) SHERICE JOANN WILLIAMS)
15) aka SHERICE JOAN WILLIAMS)
16) aka SHERICE WILLIAMS)
17) ID No. 2662737)
18) Defendant.)

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 SHERICE JOANN WILLIAMS, the Defendant above
22 named, has committed the offense of Submitting False Claims, a category D felony violation
23 of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) count, in Clark County, State of
24 Nevada as follows:

25 **COUNT ONE**
26 **SUBMITTING FALSE CLAIMS**
(NRS 422.540(1)(a) and NRS 422.540(2)(a) Felony, Category D)

27 Defendant, through a scheme or continuous course of conduct, intentionally caused
28 claims to be made for payment from Medicaid that Defendant knew were false, to wit:

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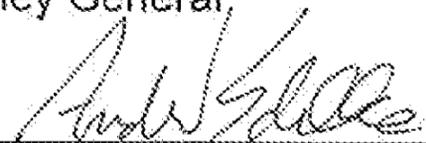
1 On or about February 2012 through May 2012, Defendant was employed as a
2 behavioral health provider by Fresh Start Family Services, LLC (Fresh Start). During times
3 stated herein, Fresh Start was located at 4224 Arcata Way, Suite A, North Las Vegas,
4 Nevada and 3934 La Madre Way, North Las Vegas, Nevada. Fresh Start assigned Medicaid
5 recipient N.L. (Medicaid no. 00XXXXXX880) as a patient/client for Defendant to provide
6 behavioral health services. While so employed, Defendant did knowingly create/write fictitious
7 documentation, including progress notes and time and attendance documents, concerning
8 the behavioral health services she allegedly provided to Medicaid recipient N.L. Defendant
9 intentionally provided the fraudulent documentation to Fresh Start knowing it would be used to
10 generate false bills/claims submitted for reimbursement from Medicaid. The documentation
11 was false as many of Defendant's records did not note the actual dates, times, or services
12 provided to the N.L.

13 All of which was committed in Clark County, aggregating an amount in excess of
14 \$650.00, and constitutes a category D felony in violation of NRS 422.540.

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

18 Dated this 11 day of October, 2013.

19 CATHERINE CORTEZ MASTO
20 Attorney General

21 By: 
22 ANDREW SCHULKE
23 Sup. Senior Deputy Attorney General
24 Medicaid Fraud Control Unit
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