



CLERK OF THE COURT

1 **INFM**  
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14 (I.A. 07/14/2014, 1:00 P.M.)

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

10 STATE OF NEVADA, )  
11 )  
12 Plaintiff, )  
13 )  
14 v. )  
15 )  
16 STEPHANIE SIERAD )  
17 aka STEPHANIE ANN NAMOCA, )  
18 ID No.1097598 )  
19 )  
20 Defendant. )  
21 )  
22 )  
23 )  
24 )

Case No.: C14-299263-1  
Dept. No.: 10

17 **INFORMATION**

18 The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO,  
19 Nevada Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,  
20 informs this Honorable Court that STEPHANIE SIERAD aka STEPHANIE ANN NAMOCA, the  
21 Defendant above named, has committed the offense of FAILURE TO MAINTAIN ADEQUATE  
22 RECORDS, a gross misdemeanor in violation of NRS 422.570(1), one (1) count, in Clark  
23 County, State of Nevada as follows:

24 **COUNT ONE**  
25 **FAILURE TO MAINTAIN ADEQUATE RECORDS**  
26 **NRS 422.570(1), Gross Misdemeanor**

27 Defendant, upon causing claims to be submitted or payment received pursuant to the  
28 Nevada State Medicaid plan, did knowingly and intentionally fail to maintain such records as  
are necessary to disclose fully the nature of the goods or services for which the claims were

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

4 On or about July 2012 through October 2012, Defendant was employed as a personal  
5 care aide by High Class Personal Care, LLC (High Class) and New Sunset Personal Care,  
6 LLC (New Sunset). During times stated herein, High Class was located at 5000 W. Oakey  
7 Blvd. Suite E1, Las Vegas, Nevada in Clark County. During times stated herein, New Sunset  
8 was located at 336 S. Jones Blvd. Suite C, Las Vegas, Nevada in Clark County. High Class  
9 and New Sunset assigned Medicaid recipients L.N. (Medicaid No. 32XXXXXX004) and T.B.  
10 (Medicaid No. 00XXXXXX147) as patients/clients for Defendant to provide home care  
11 services. While so employed, Defendant did knowingly fail to maintain accurate  
12 documentation, including time and attendance documents, concerning the home care actually  
13 provided to Medicaid recipient L.N. and T.B. Defendant knew these records were used as a  
14 basis for claims submitted for reimbursement from Medicaid. Defendant subsequently  
15 received payment for such claimed services. Defendant intentionally failed to maintain  
16 accurate records that are necessary to fully disclose the nature of the service for those claims.  
17 Many of Defendant's records did not note accurate or true dates, times or length of services  
18 provided.

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

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

24 Dated this 9<sup>th</sup> day of July, 2014.

25 CATHERINE CORTEZ MASTO  
26 Attorney General

27 By: Andrew Schulke  
28 Andrew Schulke  
Sup. Senior Deputy Attorney General