

CLERK OF THE COURT

1 **INFM**
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8 **(I.A. 03/26/2015, 9:30 A.M.)**

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

11 STATE OF NEVADA,)
12 Plaintiff,) Case No.: C15-304783-1
13 v.) Dept. No.: XVII
14 JEREMY SEAN LONG,)
15 ID No. 1448518,)
16 Defendant.)

17 **CRIMINAL INFORMATION**

18 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada
19 Attorney General, and MATTHEW L. JENSEN, Senior Deputy Attorney General, hereby
20 informs the Court that JEREMY SEAN LONG, the above-named Defendant, has committed
21 the criminal offense of INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS, a
22 gross misdemeanor violation of NRS 422.570, within Clark County, State of Nevada as
23 follows:

24 From on or about June 2012 through August 2012, Serenity Mental Health LLC
25 ("Serenity"), located at 1901 S. Jones Boulevard, Las Vegas, Nevada, 89146, submitted
26 several claims to Medicaid for reimbursement for services provided to several Medicaid
27 recipients. Defendant was employed or contracted as a service provider with Serenity, and
28 Serenity identified Defendant as having provided the services for which reimbursement was

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1 sought. Medicaid recipients under whose identities Serenity submitted claims are exemplified
2 by recipients J.B. (Medicaid no. 00*****890), P.B. (Medicaid no. 00*****871), J.J. (Medicaid
3 no. 00*****059), N.J. (Medicaid no. 00*****393), C.R. (Medicaid nos. 00*****157 and
4 00*****057), D.R. (Medicaid nos. 00*****058 and 00*****222), R.R. (Medicaid nos.
5 74*****010 and 00*****056), K.S. (Medicaid no. 00*****317) and B.H. (Medicaid no.
6 00*****732) (collectively, the "Medicaid Recipients").

7 **COUNT 1**
8 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
9 **NRS 422.570(1)**
10 **Gross Misdemeanor**

11 Defendant, upon causing claims to be submitted or payment received pursuant to the
12 Nevada State Medicaid plan, did intentionally fail to maintain such records as are necessary to
13 disclose fully the nature of the goods or services for which the claims were submitted or
14 payment was received for at least 5 years after the date on which payment was received. The
15 actions occurred as part of Defendant's routine business practices/scheme or continuous
16 course of conduct, to wit:

17 Defendant intentionally failed to maintain accurate documentation, including progress
18 notes and claims documents, concerning the services actually provided to the Medicaid
19 Recipients. Defendant created documentation asserting that certain services were provided to
20 the Medicaid Recipients by him, but such services were not actually provided. Defendant
21 knew these records were used as a basis for claims submitted for reimbursement from
22 Medicaid. Defendant obtained payment from Medicaid to Serenity for such claimed services.
23 Many of Defendant's and Serenity's records did not note accurate or true dates or types of
24 services purportedly provided to the Medicaid Recipients.

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

27 *///*

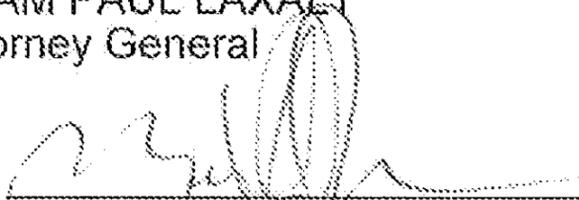
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1 All of which is contrary to the form, force and effect of the statutes in such cases made
2 and provided, and against the peace and dignity of the State of Nevada. Furthermore,
3 complainant makes this declaration subject to the penalty of perjury.

4 DATED this 5th day of March, 2015.

5 ADAM PAUL LAXALT
6 Attorney General

7 By: 
8 Matthew L. Jensen
9 Sr. Deputy Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **CRIMINAL INFORMATION** with the Clerk of the Court by using the electronic filing system on the 6th day of March, 2015.

I certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage prepaid, to the following unregistered participants:

Andrew M. Leavitt, Esq.
633 S. Seventh Street
Las Vegas, NV 89101

/s/ Patricia McCoy
An Employee of the Office of the Attorney General