

CLERK OF THE COURT

**INFM**

CATHERINE CORTEZ MASTO  
Attorney General  
ANDREW SCHULKE  
Sup. Senior Deputy Attorney General  
Nevada Bar No. 10218  
Office of the Attorney General  
555 E. Washington Ave., Ste. 3900  
Las Vegas, Nevada 89101-1068  
P: (702) 486-3420  
F: (702) 486-3768  
ASchulke@ag.nv.gov  
Attorneys for Plaintiff  
**(I.A. 01/08/2015, 9:30 A.M.)**

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

STATE OF NEVADA,

Plaintiff,

vs.

MICHIKO NICOLE MARTIN  
I.D. NO. 1989472,

Defendant.

CASE NO.: C14-303157-1

DEPT NO.: XXI

**INFORMATION**

The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO, Nevada Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General, informs this Honorable Court that MICHIKO NICOLE MARTIN, the Defendant above named, has committed the offense of INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS, a gross misdemeanor violation of NRS 422.570(1), one (1) count, as follows:

**COUNT ONE**

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

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 are necessary to disclose fully the nature of the goods or services for which the claims were submitted or payment was received for at least 5 years after the date on which payment was

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Attorney General's Office  
555 E. Washington, Suite 3900  
Las Vegas, NV 89101

1 received. The actions occurred as part of Defendant's routine business practices/scheme or  
2 continuous course of conduct, to wit:

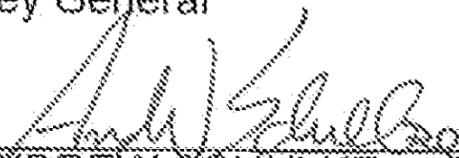
3 From on or about May 2012 to July 2013, Defendant allegedly provided Rehabilitative  
4 Mental Health (RMH) services to the Medicaid recipients. While so employed, Defendant did  
5 knowingly fail to maintain accurate documentation, including progress notes and time and  
6 attendance documents, concerning the RMH services provided to the Medicaid Recipients.  
7 Defendant knew these records were used as a basis for claims submitted for reimbursement  
8 from Medicaid. Defendant subsequently received payment for such claimed services.  
9 Defendant intentionally failed to maintain accurate records that are necessary to fully disclose  
10 the nature of the service for those claims. Many of Defendant's records contained conflicting  
11 times and did not note accurate or true dates, times or length of services provided.

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

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

17 Dated this 21<sup>st</sup> day of December, 2014.

18 CATHERINE CORTEZ MASTO  
19 Attorney General

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