



CLERK OF THE COURT

INFM

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(I.A. 03/05/2015, 9:30 A.M.)

**DISTRICT COURT
CLARK COUNTY, NEVADA**

STATE OF NEVADA,

Plaintiff,

v.

NATHANIEL DAVIS,

Defendant.

CASE NO.: C15-304525-1

DEPT NO.: V

INFORMATION

The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General, informs this Honorable Court that NATHANIEL DAVIS, the Defendant above named, has committed the offenses of Submitting False Claims, a category D felony violation of NRS 422.540(1) and NRS 422.540(2)(a), one (1) count; as follows:

COUNT ONE

SUBMITTING FALSE CLAIMS

(NRS 422.540(1) and NRS 422.540(2)(a) Felony, Category D)

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

From on or about October 2011 to October 2013, Defendant co-owned and operated Inspiration Behavioral Management, Inc. (Inspiration). Defendant was also the Administrative

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1 Director of Inspiration. During times stated herein, Inspiration was located at 3900 W.
2 Charleston Blvd., Suite 170, Las Vegas, Nevada and 2001 S. Rainbow Blvd., Suite 130, Las
3 Vegas, Nevada. All locations were located in Clark County, Nevada.

4 From on or about October 2011 to October 2013, Defendant submitted claims, through
5 Inspiration, to Medicaid for services allegedly provided to Medicaid recipients. Medicaid
6 recipients who allegedly received services from Inspiration during this time period are
7 exemplified by: C.C. (Medicaid ID# 602XXXXX001), B.F. (Medicaid ID# 000XXXXX641), and
8 B.C. (Medicaid ID# 000XXXXX832) (collectively, "the Medicaid Recipients"). During this time,
9 Defendant intentionally submitted fraudulent claims to Medicaid. The fraudulent claims were
10 based on fraudulent documentation, or no documentation at all, that was used to generate
11 false bills/claims submitted for reimbursement from Medicaid. The Medicaid Recipients
12 denied that they had received the amount of services or the type of services allegedly
13 provided by Inspiration. Also, the documentation used to substantiate the Medicaid claim was
14 either missing or was false. The documentation was false as many of Inspiration's records
15 did not note the actual dates, times, service provider, or services provided to the Medicaid
16 Recipients.

17 All of which was committed in Clark County, aggregating an amount in excess of
18 \$650.00, and constitutes a category D felony in violation of NRS 422.540.

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

22 DATED this 21st day of February, 2015.

23 ADAM PAUL LAXALT
24 Attorney General

25 By: 
26 ANDREW SCHULKE
27 Sup. Senior Deputy Attorney General
28