



CLERK OF THE COURT

1 **INFM**
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Attorneys for Plaintiff
8 **(I.A. 06/22/2015, 10:00 A.M.)**

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA,)

12 Plaintiff,)

13 v.)

14 GRACE MCKINLEY,)

15 Defendant.)

CASE NO.: C-15-307264-1

DEPT NO.: XXIII

16
17 **INFORMATION**

18 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada
19 Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General, informs
20 this Honorable Court that GRACE MCKINLEY, the Defendant above named, committed the
21 offense of INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS, a gross
22 misdemeanor violation of NRS 422.570(1), one (1) count; as follows:

23
24 **COUNT ONE**
INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS
25 **(NRS 422.570(1) Gross Misdemeanor)**

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

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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 From on or about November 2011 to June 2013, Defendant owned, operated, and was
5 a service provider for Grace and Wellness, LLC (Grace and Wellness). During times stated
6 herein, Grace and Wellness was located at 9175 S. Las Vegas Blvd, Las Vegas, Nevada, and
7 3551 E. Bonanza Road, Suite 101, Las Vegas, Nevada. All locations were located in Clark
8 County, Nevada.

9 While working for Grace and Wellness, Defendant allegedly provided Rehabilitative
10 Mental Health (RMH) services to Medicaid recipients. While allegedly providing such
11 services, Defendant did knowingly fail to maintain accurate documentation, including progress
12 notes and time and attendance documents, concerning the RMH services provided to the
13 Medicaid Recipients. Defendant knew these records were used as a basis for claims
14 submitted for reimbursement from Medicaid. Defendant subsequently received payment for
15 such claimed services. Defendant intentionally failed to maintain accurate records that are
16 necessary to fully disclose the nature of the service for those claims. Many of Defendant's
17 records did not note the actual dates, times, or services provided to the Medicaid Recipients.

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

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

23 DATED this 19th day of June, 2015.

24 ADAM PAUL LAXALT
25 Attorney General

26 By: /s/ Andrew Schulke
27 ANDREW SCHULKE
28 Sup. Senior Deputy Attorney General