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6 Attorneys for Plaintiff

7 **IN THE SECOND JUDICIAL DISTRICT COURT OF**
8 **THE STATE OF NEVADA IN AND FOR THE**
9 **COUNTY OF WASHOE**

10 STATE OF NEVADA,

Case No.: CR15-1432

11 Plaintiff,

Dept. No.: 10

12 v.

13 JESSYCA GIBSON aka
14 JESSYCA GEESAMAN,

15 Defendant.

16 **CRIMINAL INFORMATION**

17 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada
18 Attorney General, and MARK J. KRUEGER, Senior Deputy Attorney General, in the name
19 and by the authority of the State of Nevada, informs the court that JESSYKA GIBSON aka
20 JESSYCA GEESAMAN, the above named defendant, has committed the criminal offense of
21 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**, a gross misdemeanor in
22 violation of NRS 422.570 (Count 1); within Washoe County, State of Nevada, as follows:

23 Nova Behavioral Services, LLC ("Nova") maintained an agreement with Medicaid to be
24 a provider of mental health services to Medicaid recipients. At all times relevant to these
25 allegations, Nova maintained an office location at 4860 Vista Blvd., Suite 200, Sparks,
26 Nevada. Defendant was Nova's case manager and program director.

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1 From on or about January 2013 through May 2014, Nova submitted several claims to
2 Medicaid for reimbursement under the Medicaid number of several Medicaid recipients.
3 Through these claims, Nova represented that it had provided certain mental health services
4 these recipients.

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

10 Defendant, upon causing claims to be submitted or payment received pursuant to the
11 Nevada State Medicaid plan, intentionally failed to maintain such records as are necessary to
12 disclose fully the nature of the goods or services for which the claims were submitted or
13 payment was received for at least 5 years after the date on which payment was received, to
14 wit:

15 Defendant knowingly failed to maintain accurate documentation, including progress
16 notes, service activity logs, and claims documents, concerning the services actually provided
17 to Medicaid recipients. Defendant created, or directed others to create, documentation
18 asserting that certain services were provided to Medicaid recipients, knowing such services
19 were not provided. Defendant knew these records were used as a basis for claims submitted
20 for reimbursement from Medicaid, and Nova received payment for such claimed services.
21 Many of Nova's records were missing or did not accurately and truthfully note services
22 provided.

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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.

3 Dated this 27th day of September, 2015.

4 ADAM PAUL LAXALT
5 Attorney General

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7 By: 
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