



CLERK OF THE COURT

1 **INFM**
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15 (I.A. 12/01/15, 10:00 A.M.)

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

11 THE STATE OF NEVADA,
12 Plaintiff,
13 v.
14 JOHN JEROME BANKS,
15 ID No. 1264612
16 Defendant.

CASE NO.: C15-310926-1
DEPT NO.: XXI

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 JOHN JEROME BANKS, the Defendant above named, has
21 committed the offense of INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS, a
22 gross misdemeanor violation of NRS 422.570(1), one (1) count, in Clark County, State of
23 Nevada as follows:

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

28 Defendant, upon causing claims to be submitted or payment received pursuant to the
Nevada State Medicaid plan, did intentionally fail to maintain such records as are necessary to

1 disclose fully the nature of the goods or services for which the claims were submitted or
2 payment was received for at least 5 years after the date on which payment was received. The
3 actions occurred as part of Defendant's routine business practices/scheme or continuous
4 course of conduct, to wit:

5 From on or about June 2012 through January 2015, Serenity Mental Health LLC
6 ("Serenity"), located in Las Vegas, Nevada, submitted several claims to Medicaid for
7 reimbursement for services allegedly provided by Defendant to Medicaid recipients.

8 Defendant intentionally failed to maintain accurate documentation, including progress
9 notes and claims documents, concerning the services actually provided to Medicaid
10 recipients. Defendant created documentation asserting that certain services were provided to
11 Medicaid recipients, but such services were not actually provided. Defendant knew these
12 records were used as a basis for claims submitted for reimbursement from Medicaid.
13 Defendant obtained payment from Medicaid through Serenity for such claimed services. Many
14 of Defendant's records did not note accurate or true dates or types of services purportedly
15 provided to Medicaid recipients.

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

19 DATED this 20th day of November, 2015.

20 ADAM PAUL LAXALT
21 Attorney General

22 By: 
23 ANDREW SCHULKE
24 Sup. Senior Deputy Attorney General
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