

CLERK OF THE COURT

INFM

ADAM PAUL LAXALT
Attorney General
ANDREW SCHULKE
Sup. Senior Deputy Attorney General
Nevada Bar No. 10218
Office of the Attorney General
Medicaid Fraud Control Unit
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. 05/04/2016, 10:00A.M.)

DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

v.

ADVANCED COUNSELING GROUP, LLC
dba ADVANCED BEHAVIORAL CARE,

Defendant.

Case No.: C16-314417-1

Dept. No.: 9

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 ADVANCED COUNSELING GROUP, LLC dba ADVANCED BEHAVIORAL CARE (ABC), 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, in Clark County, State of Nevada as follows:

COUNT ONE
INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS
(NRS 422.570(1) Gross Misdemeanor)

Defendant ABC, 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

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

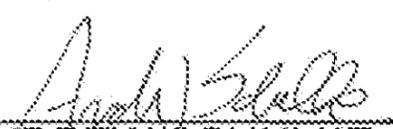
3 From on or about April 2014 to July 2014, Defendant ABC was located at 6895 West
4 Charleston Boulevard, Las Vegas located in Clark County, Nevada. Defendant ABC did
5 knowingly fail to maintain accurate documentation, including progress notes, for services
6 allegedly provided to Medicaid recipients. Defendant ABC knew these records were used as
7 a basis for claims submitted for reimbursement from Medicaid. Defendant ABC subsequently
8 received payment for such claimed services. The documentation required to be maintained by
9 Defendant ABC to substantiate the Medicaid claims was missing.

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

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

15 DATED this 3rd day of May, 2016.

16 ADAM PAUL LAXALT
17 Attorney General

18 By: 
19 ANDREW SCHULKE
20 Sup. Senior Deputy Attorney General
21
22
23
24
25
26
27
28