

1 ADAM PAUL LAXALT
Attorney General
2 MARK J. KRUEGER
Senior Deputy Attorney General
Nevada Bar No. 7410
3 Office of the Attorney General
Medicaid Fraud Control Unit
4 100 North Carson Street
Carson City, Nevada 89701
5 P: (775) 684-1185
6 F: (775) 684-1192

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

9
10 STATE OF NEVADA,

11 Plaintiff,

Case No. CR16-0317

12 v.

Dept. No. 6

13 KENNETH BLAKE, JR.,

14 Defendants.

15
16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Attorney
18 General, and MARK J. KRUEGER, Senior Deputy Attorney General, in the name and
19 authority of the State of Nevada, informs the court that KENNETH BLAKE, JR., the
20 Defendant, above-named, has committed the criminal offense of **STATEMENTS**
21 **REGARDING TRUTH AND ACCURACY: MEDICAID FRAUD** a category D felony in violation
22 of NRS 422.550(1) and NRS 422.550(2) (Count I), within Washoe County, State of Nevada, in
23 the manner following:

24 **Count I**

25 **STATEMENTS REGARDING TRUTH AND ACCURACY: MEDICAID FRAUD**

26 **("D" Felony – NRS 422.550(1) and NRS 422.550(2))**

27 That the Defendant, KENNETH BLAKE, JR., on or between July 28, 2011 and
28 February 6, 2012, and/or on or between September 16, 2012 and July 31, 2015, did, sign or

1 submit, or caused to be signed or submitted, a statement, for an application or report
2 submitted to participate as a provider, that all matters stated therein are true and accurate,
3 signed by a natural person who is the provider or is authorized to act for the provider, under
4 the pains and penalties of perjury, knowing that the application or report contains information
5 which is false, in whole or in part, by commission or by omission, all of which occurred in the
6 manner following, to wit: Defendant, a natural person, signed and/or submitted a Medicaid
7 application packet containing the statement that all matters stated therein are true and
8 accurate under the pains and penalties of perjury, using false information, including
9 information that Defendant had the required education and/or indicated that Defendant was
10 not a felon, knowing the information was false.

11 All of which is contrary to the form, force and effect of the Statutes in such cases made
12 and provided and against the peace and dignity of the State of Nevada.

13 Pursuant to NRS 239B.030, the undersigned hereby affirms that this document does
14 not contain personal information about any person.

15 DATED this 14th day of MARCH, 2016.

17 ADAM PAUL LAXALT
18 Attorney General

19 By: 

20 MARK J. KRUEGER
21 Senior Deputy Attorney General
22 Nevada Bar No. 7410
23 Office of the Attorney General
24 Medicaid Fraud Control Unit
25 100 North Carson Street
26 Carson City, NV. 89701-4717
27 (775) 684-1185
28 (775) 684-1192 Fax
mkrueger@ag.nv.gov