



CLERK OF THE COURT

1 **AINF**
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8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,)
11 Plaintiff,)
12 v.)
13 LINDA CRUTCHER-AUSTIN)
aka LINDA FAYE CRUTCHER,)
14 ID No. 965102)
15 Defendant.)

Case No.: C16-312586-1

Dept. No.: VI

16
17 **AMENDED CRIMINAL 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 LINDA CRUTCHER-AUSTIN aka LINDA FAYE CRUTCHER, the
21 Defendant above named, has committed the offenses of INTENTIONAL FAILURE TO
22 MAINTAIN ADEQUATE RECORDS, a gross misdemeanor violation of NRS 422.570(1), one
23 (1) count, in Clark County, State of Nevada as follows:

24 From on or about January 2013 to November 2013, Defendant owned, operated, and
25 was a service provider for Steppin' Out Family Services, LLC (Steppin' Out). During times
26 stated herein, Steppin' Out was located at 2480 North Decatur Blvd, Suite 125, Las Vegas,
27 Nevada and 3624 Russian Olive Street, North Las Vegas, Nevada. All locations were located
28 in Clark County, Nevada.

Office of the Attorney General
555 East Washington Avenue, Suite 3900
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1 COUNT ONE
2 INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS
3 (NRS 422.570(1) Gross Misdemeanor)

4 Defendant, upon causing claims to be submitted or payment received pursuant to the
5 Nevada State Medicaid plan, did knowingly and intentionally fail to maintain such records as
6 are necessary to disclose fully the nature of the goods or services for which the claims were
7 submitted or payment was received for at least 5 years after the date on which payment was
8 received. The actions occurred as part of Defendant's routine business practices/scheme or
9 continuous course of conduct, to wit:

10 From on or about January 2013 to November 2013, Defendant allegedly provided
11 Rehabilitative Mental Health (RMH) services to the Medicaid recipients in Clark County,
12 Nevada. While allegedly providing such services, Defendant did knowingly fail to maintain
13 accurate documentation, including progress notes and time and attendance documents,
14 concerning the RMH services provided to the Medicaid Recipients. Defendant knew these
15 records were used as a basis for claims submitted for reimbursement from Medicaid.
16 Defendant subsequently received payment for such claimed services. Defendant intentionally
17 failed to maintain accurate records that are necessary to fully disclose the nature of the
18 service for those claims. Many of Defendant's records did not note the actual dates, times, or
19 services provided to the Medicaid Recipients.

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

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

25 DATED this 25th day of August, 2016.

26 ADAM PAUL LAXALT
27 Attorney General

28 By: 

ANDREW SCHULKE
Sup. Senior Deputy Attorney General