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CLERK
BY G. O. O. DEPUTY

7 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
8 IN AND FOR CARSON CITY

9
10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 ELIZABETH ANNE GERTON,

14 Defendant.

Case No. *16CR120.001*

Dept. No. II

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16 INFORMATION

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18 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Attorney
19 General, and MARK J. KRUEGER, Senior Deputy Attorney General, in the name and
20 authority of the State of Nevada, informs the court that ELIZABETH ANNE GERTON, the
21 Defendant, above-named, in Carson Township, Carson City, State of Nevada, has
22 alternatively committed the crime of **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a
23 category D felony in violation of NRS 422.540(1) and 422.540(2)(a) (Count I) or **ATTEMPT TO**
24 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a category E felony or Gross
25 Misdemeanor in violation of NRS 422.540(1), NRS 422.540(2)(a) and NRS 193.330(1)(a)(5)
26 (Count II); in the manner following:
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Count I

SUBMITTING FALSE CLAIMS: MEDICAID FRAUD

("D" Felony – NRS 422.540(1) and 422.540(2)(a))

That the Defendant, ELIZABETH ANNE GERTON, on or between September 1, 2014 and February 28, 2015, did, with the intent to defraud, commit an offense with respect to the State Plan for Medicaid, by making a claim or caused a claim to be made, knowing the claim to be false, in whole or in part, by commission or omission, and/or making or causing to be made a statement or representation for use by another in obtaining goods or services pursuant to the State Plan for Medicaid, knowing the statement or representation to be false, in whole or in part, by commission or omission, all of which occurred in the manner following, to wit: Defendant used information, including information of Medicaid recipients and/or their Medicaid recipient identification numbers, of L.S. (Medicaid ID No. XXXXXX48832) and/or M.L. (Medicaid ID No. XXXXXX58063) and submitted or caused to be submitted, claims to the State Plan for Medicaid for reimbursement while representing she had provided certain Medicaid approved services to the Medicaid recipients which were not provided by Defendant, and the amount of the claims or value of the goods or services obtained or sought to be obtained was greater than \$650.00.

Count II

ATTEMPT TO SUBMITTING FALSE CLAIMS: MEDICAID FRAUD

("E" Felony or Gross Misdemeanor – NRS 422.540(1), NRS 422.540(2)(a) and NRS 193.330(1)(a)(5))

That the Defendant, ELIZABETH ANNE GERTON, on or between September 1, 2014 and February 28, 2015, did attempt to commit, with the intent to defraud, an offense with respect to the State Plan for Medicaid, by making a claim or caused a claim to be made, knowing the claim to be false, in whole or in part, by commission or omission, and/or making or causing to be made a statement or representation for use by another in obtaining goods or services pursuant to the State Plan for Medicaid, knowing the statement or representation to be false, in whole or in part, by commission or omission, all of which occurred in the manner

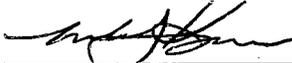
1 following, to wit: Defendant attempted to use information, including information of Medicaid
2 recipients and/or their Medicaid recipient identification numbers, of L.S. (Medicaid ID No.
3 XXXXXX48832) and/or M.L. (Medicaid ID No. XXXXXX58063) and attempted to submit or
4 caused to be submitted, claims to the State Plan for Medicaid for reimbursement while
5 representing she had provided certain Medicaid approved services to the Medicaid recipients
6 which were not provided by Defendant, and the amount of the claims or value of the goods or
7 services obtained or sought to be obtained was greater than \$650.00.

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

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

12 DATED this 22ND day of JUNE, 2016.

13
14 ADAM PAUL LAXALT
Attorney General

15
16 By: 

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