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LISA C. LLOYD  
LINCOLN COUNTY CLERK

DEPUTY

1 Case No. CR0717016

2 Dept. No.

6 **IN THE SEVENTH JUDICIAL DISTRICT OF THE STATE OF NEVADA**

7 **IN AND FOR THE COUNTY OF LINCOLN**

9 THE STATE OF NEVADA, )  
 )  
 10 Plaintiff, )  
 )  
 11 vs. )  
 )  
 12 ADAM PAUL KATSCHKE, )  
 )  
 13 Defendant. )

**CRIMINAL INFORMATION**

14 The undersigned, ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and  
 15 through his Deputies, RONDA CLIFTON and ANDREW SCHULKE, in the name and by the authority of  
 16 the State of Nevada, informs the above-entitled court that ADAM PAUL KATSCHKE, the defendant  
 17 above named, has committed the offenses of:

18 **COUNT I**

19 **INSURANCE FRAUD**

20 **(Category D Felony - NRS 686A.2815(2))**

21 DEFENDANT ADAM PAUL KATSCHKE, on or about November 14, 2013, to on or about April  
 22 9, 2015, within the County of Lincoln, State of Nevada, did knowingly, willfully and unlawfully present  
 23 or cause to be presented statements as part of, or in support of, claims for payment or other benefits under  
 24 policies of insurance licensed by this state, known by him to conceal or omit facts, or contain false or  
 25 misleading information concerning any fact material to those claims, to wit: DEFENDANT, a pharmacist,  
 26 and owner of Meadow Valley Pharmacy, submitted claims or caused claims to be filed with numerous  
 27 insurance companies of recipients for compound medication. DEFENDANT knowingly, willfully and  
 28 unlawfully provided false information in support of claims resulting in voluminous amounts of

1 compounds being billed to insurance companies that were not prescribed by a physician and/or were not  
2 requested by the recipients, and in many instances, the compounds were never received by the recipients.

3 **COUNT II**

4 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**

5 **(Category D Felony - NRS 422.540(1) and 422.540(2)(a))**

6 DEFENDANT ADAM PAUL KATSCHKE, through a scheme or continuous course of conduct,  
7 intentionally caused claims to be made for payment from Medicaid that DEFENDANT knew were false,  
8 to wit:

9 From on or about April 2013 to April 2015, DEFENDANT, a pharmacist and owner of Meadow  
10 Valley Pharmacy, did knowingly maintain fictitious documentation, including prescriptions, for products  
11 allegedly provided to Medicaid recipients. The documentation was used to generate false bills/claims  
12 submitted for reimbursement from Medicaid. The documentation maintained by DEFENDANT to  
13 substantiate the Medicaid claims was false as many of DEFENDANT'S records did not note the actual  
14 quantity or products allegedly provided to the Medicaid recipients. Also, the Medicaid recipients denied  
15 that they had received the amount of products allegedly provided by DEFENDANT.

16 All of which was committed in the County of Lincoln, aggregating an amount in excess of  
17 \$650.00, and constitutes a category D felony in violation of NRS 422.540.

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1 All of which is contrary to the form, force and effect of the statutes in such cases, made and  
2 provided, and against the peace and dignity of the State of Nevada. Therefore, the defendant may be dealt  
3 with according to law.

4 **AFFIRMATION PURSUANT TO NRS 239B.030**

5 The undersigned does hereby affirm that the preceding document, CRIMINAL INFORMATION,  
6 filed in the Seventh Judicial District Court, State of Nevada v. Adam Paul Katschke, does not contain the  
7 social security number of any person.

8 RESPECTFULLY SUBMITTED this 12<sup>th</sup> day of July, 2016.

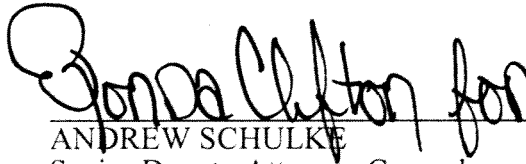
9 ADAM PAUL LAXALT  
10 Attorney General

11 By:



12 RONDA CLIFTON  
13 Senior Deputy Attorney General  
14 Nevada Bar No. 4733  
15 Criminal Justice Bureau  
16 5420 Kietzke Lane, Suite 202  
17 Reno, Nevada 89511  
18 (775) 687-1208  
19 rclifton@ag.nv.gov

20 By:



21 ANDREW SCHULKE  
22 Senior Deputy Attorney General  
23 Nevada Bar No. 10218  
24 Criminal Justice Bureau  
25 555 E. Washington Avenue, Suite 3900  
26 Las Vegas, Nevada 89101  
27 (775) 486-3218  
28 aschulke@ag.nv.gov

29 The following list contains the names and addresses of all witnesses in the matter specified above;  
30 known to the Office of the Attorney General at the time the accompanying criminal information was filed.

- 31 1. Investigator Dainelle Harris  
32 Office of the Attorney General  
33 100 N. Carson Street  
34 Carson City, NV 89701
- 35 2. Investigator Nevada Rhodes  
36 Office of the Attorney General  
37 5420 Kietzke Lane, Suite 202  
38 Reno, NV 89511

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3. Investigator Matthew Ross  
Office of the Attorney General  
555 E. Washington Avenue, Suite 3900  
Las Vegas, NV 89101
4. Investigator Maggie Figueroa  
Office of the Attorney General  
555 E. Washington Avenue, Suite 3900  
Las Vegas, NV 89101
5. Detective John Cessford  
Nevada Division of Investigation
6. Christopher Brewer  
Nevada Division of Investigation
7. Tina Italiano  
Medco/Express Scripts  
One Express Way  
St. Louis, MO 63121
8. Fran Shirek  
Anthem Blue Cross Blue Shield  
700 Broadway  
Denver, CO 80273
9. Tammy Nash  
OptumRX  
2300 Main Street, Ca134-0507  
Irvine, CA 92614
10. Special Agent Maxwell Moloney  
Dept. of Defense, Inspector General  
One North Central Avenue, Suite 1020  
Phoenix, AZ 85004
11. Special Agent Jenny Hahn  
Office of the Inspector General, Health and Human Services  
Las Vegas Office

