

1 **INFM**
2 **ADAM PAUL LAXALT**
3 **Attorney General**
4 **Steven Sidhu (Bar. No. 7516)**
5 **Senior Deputy Attorney General**
6 **State of Nevada**
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13 **Attorneys for State of Nevada**
14 **(I.A. 08/30/18, 10:00 A.M.)**

15 **DISTRICT COURT**
16 **CLARK COUNTY, NEVADA**

17 **THE STATE OF NEVADA,**

17 **Case No. C-18-334278-1**

18 **Plaintiff,**

18 **Dept. No. XXIX**

19 **vs.**

20 **DENISE GALLANT aka DENISE**
21 **WARRENETTE GALLANT aka**
22 **DENISE WARRENETTE DIXON,**
23 **I.D. No. 1565253,**

24 **Defendant.**

25 **INFORMATION**

26 **The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada**
27 **Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this**
28 **Honorable Court that DENISE GALLANT aka DENISE WARRENETTE GALLANT aka**
29 **DENISE WARRENETTE DIXON, the Defendant above named, has committed the offense**
30 **of INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS, a gross**
31 **misdemeanor violation of NRS 422.570(1), one (1) count, in Clark County, State of Nevada,**
32 **as follows:**

33 **///**

34 **///**

35 **///**

1 COUNT ONE
 2 INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS
 3 [NRS 422.570(1) Gross Misdemeanor]


4 Defendant, either by virtue of her own actions, or by and through her agents
 5 operating at her direction, upon submitting a claim for or upon receiving payment for goods
 6 or services pursuant to Medicaid, intentionally failed to maintain such records, for at least
 7 5 years after the date on which payment was received, as are necessary to disclose fully the
 8 nature of the goods or services for which the claims were submitted or payment received,
 9 to wit:

10 From about January 5, 2015 through May 27, 2016, in Clark County, Nevada,
 11 Defendant, either by virtue of her own actions, or by and through her agents operating at
 12 her direction, submitted claims to Medicaid for payment of services purportedly provided
 13 to the Medicaid Recipients, and for those claims, intentionally failed to maintain accurate
 14 or true records, such as: dates, times or length of services provided; provider names; or
 15 types of services that were purportedly provided.

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

19 DATED this 22nd day of August, 2018.

20 ADAM PAUL LAXALT
 21 Attorney General

22 By: 
 23 STEVEN SIDHU (Bar. No. 7516)
 24 Senior Deputy Attorney General