

1 **INFM**
2 **ADAM PAUL LAXALT**
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13 **Attorneys for State of Nevada**
14 **(I.A. 09/04/18, 10:00 A.M.)**

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

17 **THE STATE OF NEVADA,**

18 **Plaintiff,**

19 **vs.**

20 **SHANIQUE SHANTA POOLE,**
21 **I.D. No. 7061431,**

22 **Defendant.**

23 **Case No. C-18-334375-1**

24 **Dept. No. XIX**

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 SHANIQUE SHANTA POOLE, the Defendant above named, has**
29 **committed the offense of INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**
30 **RECORDS, a gross misdemeanor violation of NRS 422.570(1), one (1) count, in Clark**
31 **County, State of Nevada, as follows:**

32 **COUNT ONE**
33 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
34 **[NRS 422.570(1) Gross Misdemeanor]**

35 **Defendant upon submitting a claim for or upon receiving payment for goods or**
36 **services pursuant to Medicaid, intentionally failed to maintain such records, for at least 5**
37 **years after the date on which payment was received, as are necessary to disclose fully the**


1 nature of the goods or services for which the claims were submitted or payment received,
2 to wit:

3 From about June 2016 through October 2016, in Clark County, Nevada, Southern
4 Comfort PCA LLC ("Southern Comfort") submitted claims to Medicaid for payment of
5 Personal Care services Defendant purportedly provided from on or about June 19, 2016
6 through October 1, 2016 to Medicaid recipient C.T. (Medicaid ID 186XXXXX003).
7 Defendant did not actually provide these services, yet she signed timesheets and submitted
8 timesheets to Southern Comfort falsely stating she did. Accordingly, for those claims,
9 Defendant intentionally failed to maintain accurate or true records as are necessary to
10 disclose fully the nature of services for which Southern Comfort relied on for its submission
11 of claims to Medicaid.

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

15 DATED this 24th day of August, 2018.

16 ADAM PAUL LAXALT
17 Attorney General

18 By: 
19 STEVEN SIDHU (Bar. No. 7516)
20 Senior Deputy Attorney General