



1 **INFM**

2 ADAM PAUL LAXALT  
3 Attorney General  
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14 **(I.A. 10/16/2018, 10:00 A.M.)**

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 DORETHA MARSHALL SCOTT  
14 aka DORETHA MARSHALL,  
15 ID#153912,

15 Defendant.

Case No. C-18-335321-1

Dept. No. VI

16 **CRIMINAL INFORMATION**

17 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada  
18 Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,  
19 informs this Honorable Court that DORETHA MARSHALL SCOTT aka DORETHA  
20 MARSHALL, the Defendant above named, has committed the offenses of: Submitting False  
21 Claims, a category D felony violation of NRS 422.540(1) and NRS 422.540(2)(a), in Clark  
22 County, State of Nevada as follows:

23 **COUNT I**  
24 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**  
25 **[NRS 422.540(1) and NRS 422.540(2)(a), Felony, Category D]**

26 Defendant, through a scheme or continuous course of conduct, intentionally caused  
27 claims to be made for payment from Medicaid that Defendant knew were false, to wit:

28 From on or about December 2015 to January 2017, Defendant was the sole owner of  
Men on the Rise, Inc. (MOTR) located in Clark County, NV. In addition to owning MOTR,

1 Defendant was one of MOTR's individual service providers who allegedly provided services  
2 to Medicaid recipients. During the above mentioned time period, Defendant submitted  
3 and/or caused the submission of claims to Medicaid asserting that behavioral health  
4 services were provided to Medicaid recipients by her personally. Medicaid recipients  
5 denied receiving services from Defendant. Also, Defendant in many instances lacked  
6 documentation to substantiate claims for services allegedly provided by Defendant and  
7 other MOTR servicing providers.

8 All of which was committed in Clark County, aggregating an amount more than  
9 \$650.00, and constitutes a category D felony in violation of NRS 422.540.

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

13 DATED this 11<sup>th</sup> day of October, 2018.

14 ADAM PAUL LAXALT  
15 Attorney General

16 By: /s/ Andrew Schulke  
17 Andrew Schulke (Bar. No. 10218)  
18 Sup. Senior Deputy Attorney General  
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