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8 IN THE SECOND JUDICIAL DISTRICT COURT  
9 IN AND FOR WASHOE COUNTY, STATE OF NEVADA

10 THE STATE OF NEVADA,  
11 Plaintiff,  
12 vs.  
13 JOHN JOSEPH PANGALLO and  
ROBERTA LYNN PANGALLO,  
14 Defendants.

Case No. CR 19-0736AB  
Dept. No. D8

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16 **CRIMINAL INFORMATION**

17 AARON D. FORD, Attorney General of the State of Nevada, and AMY K.  
18 STEELMAN, Deputy Attorney General, in the name and by the authority of the State of  
19 Nevada, inform the above-entitled court that JOHN JOSEPH PANGALLO and ROBERTA  
20 LYNN PANGALLO, contrary to the form, force and effect of statutes in such cases made  
21 and provided, and against the peace and dignity of the State of Nevada, committed the  
22 following offense:

23 **COUNT I**  
24 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
25 **Gross Misdemeanor - NRS 422.570(1)**

26 That the Defendants, JOHN JOSEPH PANGALLO and ROBERTA LYNN  
PANGALLO, in the County of Washoe, State of Nevada, through a scheme or continuous  
27 course of conduct, upon causing claims to be submitted or payment received pursuant to  
28 the Nevada State Medicaid plan, did intentionally fail to maintain such records as are

1 necessary to disclose fully the nature of the goods or services for which the claims were  
2 submitted or payment was received for at least 5 years after the date on which payment  
3 was received, to wit:

4 On or between about March 21, 2016, and January 28, 2017, Pangallos House of  
5 Care Counseling Center (Pangallos), located in Reno, Nevada, submitted claims to  
6 Medicaid for reimbursement for services allegedly provided by Defendants and their  
7 employees to Medicaid recipients. Defendants intentionally failed to maintain accurate  
8 documentation, including progress notes, concerning the services actually provided to the  
9 Medicaid recipient. Defendants created or directed the creation of documentation asserting  
10 that certain services were provided to a Medicaid recipient, when such services were not  
11 actually provided. Many of Pangallos' records did not note accurate or true times/dates or  
12 types of services purportedly provided to the Medicaid recipients.

13 All of which is contrary to the form, force and effect of the statutes in such cases  
14 made and provided and against the peace and dignity of the State of Nevada.

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

16 The undersigned does hereby affirm that the preceding document, CRIMINAL  
17 INFORMATION, filed in the Second Judicial District Court, does not contain the social  
18 security number of any person.

19 DATED this **6th** day of **May**, 2019.

20 AARON D. FORD  
21 Attorney General

22 By: /s/ Amy K. Steelman  
23 AMY K. STEELMAN (Bar. No. 12927)  
24 Senior Deputy Attorney General  
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**WITNESS LIST**

Pursuant to NRS 173.045, the following people may be called as witnesses at trial:

1. Shellie Shannon, Office of the Attorney General
2. Jared Reed, Office of the Attorney General
3. Christopher Taylor, Office of the Attorney General
4. Tammy Younger, 4800 Kietzke Lane, Apt 106, Reno, NV 89502
5. Christian Younger, 4800 Kietzke Lane, Apt 106, Reno, NV 89502
6. Kristal Wilson, 1148 La Via Way, Sparks, NV 89434
7. Michael Freda, 3460 Warren Way, Reno, NV 89509

DATED this **6th** day of **May**, 2019.

AARON D. FORD  
Attorney General

By: /s/ Amy K. Steelman  
AMY K. STEELMAN (Bar. No. 12927)  
Senior Deputy Attorney General

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General of the State of Nevada, and that on this 6th day of **May**, 2019, I filed the foregoing CRIMINAL INFORMATION via this Court’s electronic filing system. Parties that are registered with this Court’s EFS will be served electronically.

/s/ Patricia McCoy  
An Employee of the  
Office of the Attorney General

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