



1 **INFM**
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13 Attorneys for State of Nevada
14 (I.A. 06/06/2019, 10:00 A.M.)

15 **DISTRICT COURT**

16 **CLARK COUNTY, STATE OF NEVADA**

17 **THE STATE OF NEVADA,**

18 Plaintiff,

19 vs.

20 **STEPHANY WRIGHT**
21 **aka STEPHANY ANN HANSON,**
22 **ID No. 1002979,**

23 Defendant.

24 Case No. C-19-340546-2

25 Dept. No. VI

26 **INFORMATION**

27 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
28 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
Honorable Court that STEPHANY WRIGHT aka STEPHANY ANN HANSON
("WRIGHT"), the Defendant above named, has committed the offense of **SUBMITTING**
FALSE CLAIMS: MEDICAID FRAUD, a category D felony violation of NRS
422.540(1)(a) and NRS 422.540(2)(a), one (1) count, in Clark County, State of Nevada, as
follows:

29 **COUNT I**

30 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
31 **[NRS 422.540(1)(a) and NRS 422.540(2)(a), Felony, Category D]**

32 Defendant WRIGHT, through a scheme or continuous course of conduct, with intent
33 to defraud, knowingly and intentionally made false claims or caused false claims to be made

1 for payment from Medicaid, in an aggregate amount greater than or equal to \$650:

2 From about October 1, 2017 through December 30, 2017, in Clark County, Nevada,
3 Defendant WRIGHT through Day and Night Behavioral, LLC, a Nevada limited liability
4 company (“DNB”), submitted claims to Medicaid asserting that specific services or
5 quantities of services were provided to the Medicaid recipients and requested
6 reimbursement for provision of services. Defendant knew that such services were not
7 actually provided as the number of hours billed each day vastly exceeded the total number
8 of hours in a day. The Medicaid recipients did not receive the specific services or quantities
9 of services from DNB that Defendant claimed were delivered to the Medicaid recipients.

10 All of which is contrary to 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 24th day of May, 2019.

14 AARON D. FORD
15 Attorney General

16 By: /s/ Steven Sidhu
17 STEVEN SIDHU (Bar. No. 7516)
18 Senior Deputy Attorney General
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