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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 ARIELL OLIVIA DIX and
14 NNEKA C. GIBNEY,

15 Defendants.

Case No. CR 20-0664A/B

Dept. No. D4

16 **CRIMINAL INFORMATION**

17 AARON D. FORD, Attorney General of the State of Nevada, and AMY K.
18 STEELMAN, Senior Deputy Attorney General, in the name and by the authority of the
19 State of Nevada, inform the above-entitled court that ARIELL OLIVIA DIX and NNEKA
20 C. GIBNEY, contrary to the form, force and effect of statutes in such cases made and
21 provided, and against the peace and dignity of the State of Nevada, committed the following
22 offenses:

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

26 That the Defendants, ARIELL OLIVIA DIX and NNEKA C. GIBNEY, through a
27 scheme or continuous course of conduct, upon causing claims to be submitted or payment
28 received pursuant to the Nevada State Medicaid plan, did intentionally fail to maintain
such records as are necessary to disclose fully the nature of the goods or services for which

1 the claims were submitted or payment was received for at least 5 years after the date on
2 which payment was received, to wit:

3 On or between about July 1, 2017, and September 30, 2017, Defendants were co-
4 owners of Lifetime Assistance LLC (Lifetime), located in Reno, Nevada, and submitted
5 claims to Medicaid for reimbursement for services allegedly provided by Defendants and
6 their employees to Medicaid recipients. Defendants intentionally failed to maintain
7 accurate documentation, including but not limited to notes on the basic skills training or
8 psychosocial rehabilitation services allegedly provided and legible records regarding who
9 provided medication to the recipients. Additionally, Defendants used the same records to
10 support claims with Nevada Medicaid and services paid for by Northern Nevada Adult
11 Mental Health Services.

12 All of which was committed in Washoe County and constitutes a gross misdemeanor
13 in violation of NRS 422.540.

14 **COUNT II**
15 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
16 **Gross Misdemeanor - NRS 422.570(1)**

17 That the Defendants, ARIELL OLIVIA DIX and NNEKA C. GIBNEY, through a
18 scheme or continuous course of conduct, upon causing claims to be submitted or payment
19 received pursuant to the Nevada State Medicaid plan, did intentionally fail to maintain
20 such records as are necessary to disclose fully the nature of the goods or services for which
21 the claims were submitted or payment was received for at least 5 years after the date on
22 which payment was received, to wit:

23 On or between about October 1, 2017, and December 31, 2017, Defendants were co-
24 owners of Lifetime Assistance LLC (Lifetime), located in Reno, Nevada, and submitted
25 claims to Medicaid for reimbursement for services allegedly provided by Defendants and
26 their employees to Medicaid recipients. Defendants intentionally failed to maintain
27 accurate documentation, including but not limited to notes on the basic skills training or
28 psychosocial rehabilitation services allegedly provided and legible records regarding who
provided medication to the recipients. Additionally, Defendants used the same records to

1 support claims with Nevada Medicaid and services paid for by Northern Nevada Adult
2 Mental Health Services.

3 All of which was committed in Washoe County and constitutes a gross misdemeanor
4 in violation of NRS 422.540.

5 **COUNT III**
6 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
7 **Gross Misdemeanor - NRS 422.570(1)**

8 That the Defendant, ARIELL OLIVIA DIX, through a scheme or continuous course
9 of conduct, upon causing claims to be submitted or payment received pursuant to the
10 Nevada State Medicaid plan, did intentionally fail to maintain such records as are
11 necessary to disclose fully the nature of the goods or services for which the claims were
12 submitted or payment was received for at least 5 years after the date on which payment
13 was received, to wit:

14 On or between about January 1, 2018, and January 31, 2018, Defendant was a co-
15 owner of Lifetime Assistance LLC (Lifetime), located in Reno, Nevada, and submitted
16 claims to Medicaid for reimbursement for services allegedly provided by Defendant and her
17 employees to Medicaid recipients. Defendant intentionally failed to maintain accurate
18 documentation, including but not limited to notes on the basic skills training or
19 psychosocial rehabilitation services allegedly provided and legible records regarding who
20 provided medication to the recipients. Additionally, Defendant used the same records to
21 support claims with Nevada Medicaid and services paid for by Northern Nevada Adult
22 Mental Health Services.

23 All of which was committed in Washoe County and constitutes a gross misdemeanor
24 in violation of NRS 422.540.

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

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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. Nichole Maxwell, Henson Family Services
5. Linea Pouono, P6 Family Services
6. Arno Ruymaekers, Maple Star Nevada
7. Zachary M. Birdsell, Able Services
8. Derrick Johnson, Nevada Urban Indians, Inc.

DATED this **3rd** day of **March**, 2020.

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 3rd day of **March**, 2020, 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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