



1 **INFM**
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14 (I.A. 11/30/2021, 9:30 A.M.)

15 **DISTRICT COURT**

16 **CLARK COUNTY, STATE OF NEVADA**

17 **THE STATE OF NEVADA,**

18 Plaintiff,

19 vs.

20 **KELLY ADDAM GERSTING,**

21 Defendant.

Case No. C-21-360534-2

Dept. No. 32

22 **INFORMATION**

23 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
24 Attorney General, and Steven Sidhu, Senior Deputy Attorney General, informs this
25 Honorable Court that KELLY ADDAM GERSTING, the Defendant above named, has
26 committed the offense of **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**
27 **RECORDS**, a gross misdemeanor violation of NRS 422.570, one (1) count, as follows:

28 **COUNT I**

INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS
[NRS 422.570(1), Gross Misdemeanor]

Defendant GERSTING, upon Behavioral Bilingual Services, Inc. ("BBS") submitting
a claim for or upon receiving payment for goods or services pursuant to Medicaid,
intentionally failed to maintain such records, for at least 5 years after the date on which
payment was received, as are necessary to disclose fully the nature of the goods or services
for which the claims were submitted or payment received, to wit:

1 From on or about April 25, 2015 through on or about April 21, 2019, BBS's healthcare
2 provider, Ingrid Sanchez ("Sanchez"), traveled out of the United States on several
3 occasions. GERSTING, through BBS, submitted numerous claims to Medicaid for
4 reimbursement under the Medicaid numbers of several Medicaid recipients for services
5 purportedly provided by Sanchez during the times she was out of the United States.
6 Through these claims, GERSTING represented that Sanchez had provided certain
7 Rehabilitative Mental Health services to these recipients and had provided these services
8 for certain amounts or time, when in fact Sanchez could not have provided such services.

9 Defendant GERSTING intentionally failed to maintain accurate documentation,
10 including progress notes and service documentation, concerning the services or quantities
11 of services actually provided by BBS' healthcare professionals to the Medicaid recipients.
12 Defendant knew these records were used as a basis for claims submitted for reimbursement
13 from Medicaid. BBS subsequently obtained payment for such claimed services.

14 All of which was committed in Clark County and constitutes a gross misdemeanor
15 violation of NRS 422.570(1).

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

19 DATED this 17th day of November, 2021.

20 AARON D. FORD
21 Attorney General

22 By: /s/ Steven Sidhu
23 STEVEN SIDHU (Bar. No. 7516)
24 Senior Deputy Attorney General
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