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

9
10 STATE OF NEVADA,

11 Plaintiff,

Case No. CR16-0297A

12 v.

Dept. No. 10

13 CANDIA ALEA TOLBERT,

14 Defendants.

15 INFORMATION

16
17 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Attorney
18 General, and MARK J. KRUEGER, Senior Deputy Attorney General, in the name and
19 authority of the State of Nevada, informs the court that CANDIA ALEA TOLBERT, the
20 Defendant, above-named, has committed the criminal offense of **INTENTIONAL FAILURE TO**
21 **MAINTAIN ADEQUATE RECORDS**, a gross misdemeanor in violation of NRS 422.570(1)
22 (Count I), within Washoe County, State of Nevada, in the manner following:

23 Count I

24 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**

25 **(Gross Misdemeanor – NRS 422.570(1))**


26
27 That the Defendant, CANDIA ALEA TOLBERT, on or between January 2012 and July
28 2014, did, upon submitting a claim for or upon receiving payment for goods or services

1 pursuant to the State Plan for Medicaid, intentionally fail to maintain such records as are
2 necessary to disclose fully the nature of the goods or services for which a claim was submitted
3 or payment was received, or such records as are necessary to disclose fully all income and
4 expenditures upon which rates of payment were based, for at least 5 years after the date on
5 which payment was received, all of which occurred in the manner following, to wit: Defendant
6 submitted claims to and/or received payments for goods or services from the State Plan for
7 Medicaid on behalf of Medicaid Recipients, and failed to maintain accurate documentation,
8 including but not limited to progress notes, concerning the services actually provided to
9 Medicaid Recipients and/or created, or directed others to create, documentation and/or claims
10 asserting that certain services were provided to Medicaid Recipients, knowing such services
11 were not provided or did not disclose fully the claims and/or good or services and/or payments
12 received and/or income and expenditures of rates, for a period of 5 years after the each date
13 the payments were received, all of which occurred at or near 895 Roberta Lane, Suite 101,
14 Sparks, Nevada 89431.

15 All of which is contrary to the form, force and effect of the Statutes in such cases made
16 and provided and against the peace and dignity of the State of Nevada.

17 DATED this 7th day of MARCH, 2016.

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19 ADAM PAUL LAXALT
Attorney General

20
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