

CLERK OF THE COURT

INFM  
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8 **IN THE EIGHTH JUDICIAL DISTRICT COURT**

9 **IN AND FOR THE COUNTY OF CLARK, STATE OF NEVADA**

10 THE STATE OF NEVADA, )  
11 Plaintiff, )  
12 v. )  
13 MAMIE REE HUBBARD-WASHINGTON )  
14 aka MAMIE R. HUBBARD-WASHINGTON )  
15 ID No. 2646758, )  
Defendant.)

Case No.: C16-316977-1  
Dept. No.: XII

16 **CRIMINAL INFORMATION**

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 MAMIE REE HUBBARD-  
20 WASHINGTON aka MAMIE R. HUBBARD-WASHINGTON, the Defendant, above-named, in  
21 Clark County, State of Nevada, has committed the crime of **CONSPIRACY TO SUBMIT**  
22 **FALSE CLAIMS: MEDICAID FRAUD**, a gross misdemeanor in violation of NRS  
23 199.480(3)(d) and 422.540(1) (Count I); in the manner following:

24  
25 **COUNT I**  
**CONSPIRACY TO SUBMIT FALSE CLAIMS: MEDICAID FRAUD**  
26 **NRS 199.480(3)(d) and NRS 422.540(1)**  
**Gross Misdemeanor**

27 That the Defendant, MAMIE REE HUBBARD-WASHINGTON aka MAMIE R.  
28 HUBBARD-WASHINGTON, on or about April 4, 2012, did conspire with another to cheat or

1 defraud another out of any property by unlawful or fraudulent means, and with the intent to  
2 defraud, did commit an offense with respect to the State Plan for Medicaid, make or cause to  
3 be made a statement or representation for use in qualifying as a provider, knowing the  
4 statement or representation to be false, in whole or in part, by commission or omission and/or  
5 make or cause to be made a statement or representation for use in obtaining or seeking to  
6 obtain authorization to provide specific goods or services, knowing the statement or  
7 representation to be false, in whole or in part, by commission or omission, all of which  
8 occurred in the manner following, to wit:

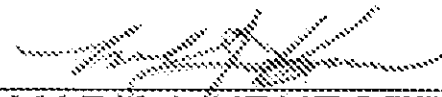
9 Defendant conspired with another and did complete an application to Nevada Medicaid  
10 to become an enrolled provider for Medicaid services using false information that Defendant  
11 had not been convicted of one or more felonies and/or that Defendant did not have any  
12 pending court cases, and knowing the statement(s) to be false, obtained or sought to be  
13 obtained authorization to provide services under the State Plan for Medicaid, and the amount  
14 of the claims or value of the services obtained or sought to be obtained as a result was  
15 greater than \$650.00, all of which occurred at or near 8837 Lauderhill Street, Las Vegas,  
16 Nevada 89131 and/or 2780 S. Jones Boulevard, Suite 105, Las Vegas, Nevada 89146.

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

19 Pursuant to NRS 239B.030, the undersigned hereby affirms that this document does  
20 not contain personal information about any person.

21 DATED this 5<sup>th</sup> day of AUGUST, 2016.

22 ADAM PAUL LAXALT  
23 Attorney General

24 By:   
25 MARK J. KRUEGER  
26 Senior Deputy Attorney General  
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