
CLERK OF THE COURT

1 **INFM**
2 **ADAM PAUL LAXALT**
3 **Attorney General**
4 **Andrew Schulke (Bar. No. 10218)**
5 **Sup. Senior Deputy Attorney General**
6 **State of Nevada**
7 **Office of the Attorney General**
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13 **Attorneys for State of Nevada**
14 **(I.A. 02/01/2017, 10:00 A.M.)**

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 **The State of Nevada,**
12 **Plaintiff(s),**

Case No. C17-320802-1
Dept. No. IX

13 **vs.**

14 **SHAWNNYCE DEONNE DAWSON**
15 **aka SHAWNNYCE DEONNE NUTT,**
16 **I.D. #1510251**

16 **Defendant(s).**

17 **CRIMINAL INFORMATION**

18 **The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada**
19 **Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,**
20 **informs this Honorable Court that SHAWNNYCE DEONNE DAWSON aka SHAWNNYCE**
21 **DEONNE NUTT, the Defendant above named, has committed the offense of SUBMITTING**
22 **FALSE CLAIMS, a category D felony violation of NRS 422.540(1) and NRS 422.540(2)(a),**
23 **in Clark County, State of Nevada as follows:**

24 **COUNT I**
25 **SUBMITTING FALSE CLAIMS**
26 **[NRS 422.540(1) and NRS 422.540(2)(a) Felony, Category D]**

26 **Defendant, through a scheme or continuous course of conduct, intentionally caused**
27 **claims to be made for payment from Medicaid that Defendant knew were false, to wit:**

28 **///**

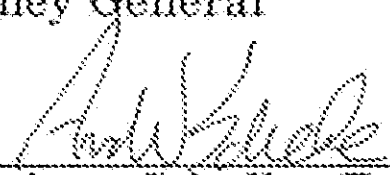
1 From on or about January 2013 to March 2015, Defendant did knowingly
2 create/write fictitious documentation, including progress notes and time and attendance
3 documents, concerning the Rehabilitative Mental Health (RMH) services she allegedly
4 provided to Medicaid recipients. Defendant intentionally provided the fraudulent
5 documentation to Sankofa knowing it would be used to generate false bills/claims
6 submitted for reimbursement from Medicaid. The Medicaid recipients denied that they had
7 received the amount of services allegedly provided by Defendant. The documentation
8 prepared by Defendant to substantiate the Medicaid claims was false as many of
9 Defendant's records did not note the actual dates, times, or services allegedly provided to
10 the Medicaid recipients.

11 All of which was committed in Clark County and constitutes a category D felony in
12 violation of NRS 422.540.

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

16 DATED this 24th day of January, 2017.

17 ADAM PAUL LAXALT
18 Attorney General

19 By: 
20 Andrew Schulke (Bar. No. 10218)
21 Sup. Senior Deputy Attorney General
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