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7 Attorneys for State of Nevada

8 IN THE SECOND JUDICIAL DISTRICT COURT, STATE OF NEVADA

9 IN AND FOR THE COUNTY OF WASHOE

10 THE STATE OF NEVADA,

11 Plaintiff(s),

12 vs.

13 JEANICE RAE MOORE  
14 aka JEANICE RAE EWING,

15 Defendant(s).

Case No. CR17-0021

Dept. No. 4

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada  
18 Attorney General, and MARK J. KRUEGER, Senior Deputy Attorney General, in the name  
19 and authority of the State of Nevada, informs the court that JEANICE RAE MOORE aka  
20 JEANICE RAE EWING (hereinafter "JEANICE MOORE"), the Defendant, above-named,  
21 has committed the criminal offenses of **SUBMITTING FALSE CLAIMS: MEDICAID**  
22 **FRAUD**, a category D felony in violation of NRS 422.540(1) and 422.540(2)(a) (Count I);  
23 and **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**, a gross  
24 misdemeanor in violation of NRS 422.570(1) (Count II), within Washoe County, State of  
25 Nevada, in the manner following:

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Count I  
**SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**  
**["D" Felony – NRS 422.540(1) and 422.540(2)(a)]**

That the Defendant, JEANICE MOORE, on or between June 12, 2015 and January 31, 2016, did, with the intent to defraud, commit an offense with respect to the State Plan for Medicaid, by making a claim or caused a claim to be made, knowing the claim to be false, in whole or in part, by commission or omission, and/or by making or causing to be made a statement or representation for use in obtaining or seeking to obtain authorization to provide specific goods or services, knowing the statement or representation to be false, in whole or in part, by commission or omission, the Defendant being responsible by the Defendant directly committing the offense and/or through JayLaray Caregiving Place, LLC, all of which occurred in the manner following, to wit: Defendant used identifying information, including the Medicaid provider identification number of Cyril Lewis (Medicaid ID XXXX36930), to represent that Defendant, through JayLaray Caregiving Place, LLC, had provided certain Medicaid approved services to Medicaid recipients which services were not provided, and/or Defendant, through JayLaray Caregiving Place, LLC, had provided certain Medicaid approved services to Medicaid recipients which services were not provided because, in part, the services were reported to have been provided at the same time Defendant was gambling at a casino, and Defendant submitted claims or caused claims to then be submitted to the State Plan for Medicaid for reimbursement, and the amount of the claims or value of the goods or services obtained or sought to be obtained was greater than \$650.00, all of which occurred at or near 1285 Crown Drive, Reno, Nevada and/or 2470 Wrondel Way, Suite 275, Reno, Nevada.

Count II  
**INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**  
**[Gross Misdemeanor – NRS 422.570(1)]**

Defendant, JEANICE MOORE, on or between June 12, 2015 and January 31, 2016, did, upon submitting a claim for or upon receiving payment for goods or services pursuant to the State Plan for Medicaid, intentionally fail to maintain such records as are necessary to disclose fully the nature of the goods or services for which a claim was submitted or

1 payment was received, or such records as are necessary to disclose fully all income and  
2 expenditures upon which rates of payment were based, for at least 5 years after the date  
3 on which payment was received, the Defendant being responsible by the Defendant directly  
4 committing the offense and/or through JayLaray Caregiving Place, LLC, all of which  
5 occurred in the manner following, to wit: Defendant, for claims submitted to Medicaid and  
6 received on behalf of Medicaid recipients, failed to maintain accurate records, including but  
7 not limited to progress notes, concerning the services actually provided to the Medicaid  
8 recipients and/or created, or directed others, including Gerald Cunningham and/or Cyril  
9 Lewis, to create documentation concerning the services actually provided or claims  
10 submitted or payment received, and/or failed to maintain such records, for a period of 5  
11 years after the each date the payments were received, all of which occurred at or near 2125  
12 Keystone Avenue, Reno, Nevada and/or 1285 Crown Drive, Reno, Nevada and/or 2470  
13 Wrondel Way, Suite 275, Reno, Nevada.

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

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

18 DATED this 9<sup>th</sup> day of JANUARY, 2017.

19 ADAM PAUL LAXALT  
20 Attorney General

21 By:   
22 MARK J. KRUEGER (Bar. No. 7410)  
23 Senior Deputy Attorney General  
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