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

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 BRADLEY STEVEN MALLORY,

14 Defendant.

Case No. CR 19-0936

Dept. No. D15

15 **CRIMINAL INFORMATION**

16 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
17 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
18 Honorable Court that BRADLEY STEVEN MALLORY, the Defendant above named, has
19 committed the offense of **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**
20 **RECORDS**, a gross misdemeanor violation of NRS 422.570(1), one (1) count, in Washoe
21 County, State of Nevada, as follows:

22 **COUNT I**
23 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
24 **[NRS 422.570(1) Gross Misdemeanor]**

25 Defendant, upon submitting a claim for or upon receiving payment for goods or
26 services pursuant to Medicaid, intentionally failed to maintain such records, for at least 5
27 years after the date on which payment was received, as are necessary to disclose fully the
28 nature of the goods or services for which the claims were submitted or payment received,
to wit:

1 Defendant intentionally failed to maintain accurate documentation, including
2 progress notes and service documentation, concerning the services or quantities of services
3 actually provided to the Medicaid recipients. Defendant knew these records were used as a
4 basis for claims submitted for reimbursement from Medicaid. Defendant subsequently
5 obtained payment for such claimed services. Many of Defendant's records were missing or
6 did not note accurate or true dates or times of services, types of services or persons
7 providing services purportedly provided to the Medicaid recipients.

8 All of which is contrary to form, force and effect of the statutes in such cases made
9 and provided and against the peace and dignity of the State of Nevada.

10 **AFFIRMATION PURSUANT TO NRS 239B.030**

11 The undersigned does hereby affirm that the preceding document, CRIMINAL
12 INFORMATION, filed in the Second Judicial District Court, does not contain the social
13 security number of any person.

14 DATED this 7th day of June, 2019.

15 AARON D. FORD
16 Attorney General

17 By: /s/ Steven Sidhu
18 STEVEN SIDHU (Bar. No. 7516)
19 Senior Deputy Attorney General
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