

ORIGINAL

AARON D. FORD
Attorney General
STEVEN SIDHU (Bar. No. 7516)
Senior Deputy Attorney General
State of Nevada
Office of the Attorney General
555 East Washington Avenue #3900
Las Vegas, NV 89101
(702) 486-3420 (phone)
(702) 486-3768 (fax)
SSidhu@ag.nv.gov

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JUSTICE COURT
LAS VEGAS, NEVADA
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Attorneys for State of Nevada

IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, STATE OF NEVADA

THE STATE OF NEVADA,

Plaintiff,

vs.

BRITTANY LATOYA JACKSON aka
BRITTANY LAYTOYA JACKSON,
ID No. 3009927,

Defendant.

Case No. 19F15572X

Dept. No. 3

CRIMINAL COMPLAINT

The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, under penalty of perjury, and within knowledge, information and belief, complains and charges:

Defendant BRITTANY LATOYA JACKSON aka BRITTANY LAYTOYA JACKSON ("JACKSON"), at the times stated herein, having committed the offenses of: **MAKING FALSE REPRESENTATIONS: MEDICAID FRAUD**, a category D felony violation of NRS 422.540(1)(d) and NRS 422.540(2)(a), one (1) count; and **PERJURY**, a category D felony violation of NRS 422.550(2), one (1) count.

Said offenses were committed against the State of Nevada, Department of Health & Human Services, Health Care Financing and Policy Division – Nevada Medicaid (hereinafter "Medicaid") in the following manner:



1 For the dates mentioned herein, Defendant JACKSON was a provider of mental
2 health services and maintained an agreement with Medicaid to be a provider of services or
3 goods. At times pertinent to these allegations, Defendant JACKSON committed said
4 offenses in Clark County, Nevada.

5 From on or about January 2017 forward, JACKSON maintained an agreement with
6 Medicaid to be a Qualified Mental Health Associate ("QMHA"). Under the agreement with
7 Medicaid, JACKSON purported to have met the qualifications to be a QMHA, which
8 included a Bachelor's Degree. In support of her application to Medicaid, JACKSON
9 included her purported transcript from Georgia College & State University ("GCSU"). Said
10 transcript belonged to Natasha Ringer ("Ringer"). JACKSON presented the altered Ringer
11 transcript as her own in order to qualify as a QMHA with Medicaid.

12 At times pertinent to these allegations, JACKSON sought and obtained employment
13 as a QMHA with various Rehabilitative Mental Health ("RMH") service providers in Clark
14 County, Nevada, including Discovery Mind and Wellness Center, LLC ("Discovery") and
15 Trillity Care Counseling ("Trillity"). Discovery maintained a business location at 2920
16 South Jones Boulevard, Suite 110-B, Las Vegas, Clark County, Nevada from which it
17 provided services to Medicaid recipients. Trillity maintained a business location at 4760
18 South Pecos Road, Las Vegas, Clark County, Nevada from which it provided services to
19 Medicaid recipients.

20 From on or about April 1, 2017 through July 22, 2017, JACKSON, through Discovery
21 and Trillity, submitted numerous claims to Medicaid for reimbursement for services
22 purportedly provided as a QMHA. Through these claims, JACKSON represented that she
23 provided Case Management services and Psychosocial Rehabilitation ("PSR") services to
24 various Medicaid recipients identified as K.B. (Medicaid ID xxxxxxxx011), E.H. (Medicaid
25 ID xxxxxxxx578) and M.P. (Medicaid ID xxxxxxxx697). Specifically, Medicaid claims
26 showed that Discovery and Trillity billed Medicaid in the amount of \$1,839.92 for Case
27 Management and PSR services allegedly provided by JACKSON as a QMHA.

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COUNT I
MAKING FALSE REPRESENTATIONS: MEDICAID FRAUD
[NRS 422.540(1)(d) and NRS 422.540(2)(a), Felony, Category D]

Defendant JACKSON, through a scheme or continuous course of conduct, with intent to defraud, knowingly and intentionally made false representations or statements for use in qualifying as a provider with Medicaid and caused payment from Medicaid, in an aggregate amount greater than or equal to \$650:

From about April 1, 2017 through July 22, 2017, in Clark County, Nevada, Defendant through Discovery Mind and Wellness Center, LLC ("Discovery") and Trillity Care Counseling ("Trillity") caused claims to be submitted to Medicaid asserting that a Qualified Mental Health Associate ("QMHA") had provided specific services to Medicaid recipients identified as K.B. (Medicaid ID xxxxxxxx011), E.H. (Medicaid ID xxxxxxxx578) E.G. (Medicaid ID xxxxxxxx356) and M.P. (Medicaid ID xxxxxxxx697). However, Defendant was not qualified to be a QMHA and used the altered college transcripts of Natasha Ringer as her own with her application to Medicaid purporting to have a Bachelor's Degree from Georgia College & State University. Defendant knew that she needed to have a Bachelor's Degree in order to become a QMHA with Medicaid.

Defendant JACKSON did in fact make a false statement or representation to Medicaid, resulting in payment from Medicaid in an amount greater than or equal to \$650.

All of which was committed in Clark County, aggregating in an amount greater than or equal to \$650.00, and constitutes a category D felony in violation of NRS 422.540.

COUNT II
PERJURY
[NRS 422.550(2), Felony, Category D]

Defendant JACKSON, through a scheme or continuous course of conduct, without lawful authority, signed an application that stated all matters contained therein were true and accurate under the pains and penalties of perjury, knowing it contained information that was false, to wit:

Defendant knew that she needed to have a Bachelor's Degree in order to become a Qualified Mental Health Associate ("QMHA") with Medicaid. Defendant knew she was not

1 qualified to be a QMHA and used the altered college transcripts of Natasha Ringer as her
2 own with her application to Medicaid purporting to have a Bachelor's Degree from Georgia
3 College & State University. The Medicaid application contained a declaration under
4 penalty of perjury that the information in the application and any attachments was true,
5 accurate and complete. Defendant signed the Medicaid application knowing it contained
6 false representations regarding her college degree.

7 All of which was committed in Clark County and constitutes a category D felony
8 violation of NRS 422.550(2).

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

11 Said complainant therefore requests that a Summons in Lieu of Arrest be issued for
12 Defendant BRITTANY LATOYA JACKSON aka BRITTANY LAYTOYA JACKSON in
13 order that said Defendant may be dealt with according to the laws of the State of Nevada.

14 Said complainant makes this declaration subject to the penalty of perjury.

15 DATED this 31st day of July, 2019.

16 AARON D. FORD
17 Attorney General

18 By: 
19 STEVEN SIDHU (Bar. No. 7516)
20 Senior Deputy Attorney General
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