

COPY

Original Filed

JUN 18 2026

TIMOTHY W. FITZGERALD
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STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

NICOLE PRESNELL,
[REDACTED]

Defendant.

NO. **26110176-32**
INFORMATION

Count I: Conspiracy to Commit
Theft in the First Degree
RCW 9A.28.040 and RCW
9A.56.030(1)(a)

Count II: False Statement-Medicaid
RCW 74.09.230(1)

Count III: Theft in the First Degree
RCW 9A.56.030(1)(a)

I, NICHOLAS W. BROWN, Attorney General for the State of Washington, with the concurrence of Spokane County Prosecuting Attorney Preston McCollam pursuant to RCW 43.10.232, through Assistant Attorney General Rachel Sterett, do accuse NICOLE PRESNELL of the crime of CONSPIRACY TO COMMIT THEFT IN THE FIRST DEGREE (CLASS C), FALSE STATEMENT-MEDICAID (CLASS C FELONY) and THEFT IN THE FIRST DEGREE (CLASS B FELONY), committed as follows:

COUNT I – CONSPIRACY TO COMMIT THEFT IN THE FIRST DEGREE

On, about, or between September 7, 2023 in the County of Spokane, State of Washington, the above named defendant, NICOLE PRESNELL, with intent that conduct constituting the crime of Theft in the First Degree, to wit: in a series of transactions which are part of a common

1 scheme or plan, did wrongfully obtain or exert unauthorized control over property or services of
2 another, to wit: Medicaid funds, of an aggregate value exceeding \$5,000, with intent to deprive
3 such other of such property or services, did agree with one or more persons to engage in or cause
4 the performance of that crime, and any one of such persons did take a substantial step in
5 pursuance of such agreement; contrary to RCW 9A.28.040 and RCW 9A.56.030(1)(a).

6 **COUNT II – FALSE STATEMENT – MEDICAID**

7 That the defendant, NICOLE PRESNELL, in the county of Spokane, State of
8 Washington, on, about, or between September 15, 2023 through August 20, 2024, knowingly
9 made or caused to be made any false statement or representation of a material fact in any
10 application for any payment under any medical care program authorized under RCW 74.09;
11 contrary to RCW 74.09.230(1).

12 **COUNT III – THEFT IN THE FIRST DEGREE**

13 On, about, or between September 15, 2023 through August 20, 2024, in the County of
14 Spokane, State of Washington, the above named defendant, NICOLE PRESNELL, in a series of
15 transactions which are part of a common scheme or plan, did wrongfully obtain or exert
16 unauthorized control over property or services of another, to wit: Medicaid funds, of an aggregate
17 value exceeding \$5,000, with intent to deprive such other of such property or services; contrary
18 to RCW 9A.56.020(1)(a)(b), RCW 9A.56.010, RCW 9A.56.030(1)(a); and/or was an
19 accomplice to the crime pursuant to RCW 9A.080.020.

20 DATED this 18th day of June 2026.

21 Nicholas W. Brown
22 Attorney General

23
24 BY:



25 Rachel Sterett WSBA #27141
26 Assistant Attorney General
509-225-3873