



1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 06/06/2019, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 **Plaintiff,**

13 **vs.**

14 **DAY AND NIGHT BEHAVIORAL LLC,**

15 **Defendant.**

Case No. C-19-340546-1

Dept. No. VI

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
18 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
19 Honorable Court that DAY AND NIGHT BEHAVIORAL, LLC. (“DNB”), a Nevada limited
20 liability company, the Defendant above named, has committed the offense of
21 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**,), a category D felony violation
22 of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) count, in Clark County, State of
23 Nevada, as follows:

24 **COUNT I**

25 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
26 **[NRS 422.540(1)(a) and NRS 422.540(2)(a), Felony, Category D]**

27 Defendant DNB, through a scheme or continuous course of conduct, with intent to
28 defraud, knowingly and intentionally made false claims or caused false claims to be made
for payment from Medicaid, in an aggregate amount greater than or equal to \$650:

1 From about October 1, 2017 through December 30, 2017, in Clark County, Nevada,
2 Defendant DNB, submitted claims to Medicaid asserting that specific services or quantities
3 of services were provided to the Medicaid recipients and requested reimbursement for
4 provision of services. Defendant knew that such services were not actually provided as the
5 number of hours billed each day vastly exceeded the total number of hours in a day. The
6 Medicaid recipients did not receive the specific services or quantities of services from DNB
7 that Defendant claimed were delivered 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. Furthermore,
10 complainant makes this declaration subject to the penalty of perjury.

11 DATED this 24th day of May, 2019.

12 AARON D. FORD
13 Attorney General

14 By: /s/ Steven Sidhu
15 STEVEN SIDHU (Bar. No. 7516)
16 Senior Deputy Attorney General
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