



1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 07/22/2019, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 **Plaintiff,**

13 **vs.**

14 **EMERALD VISION SERVICES, LLC,**

15 **Defendant.**

Case No. C-19-341795-1

Dept. No. V

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 EMERALD VISION SERVICES, LLC (“EMERALD”), a Nevada
20 limited liability company, the Defendant above named, has committed the offense of:
21 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a category D felony violation of
22 NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) count, in Clark County, State of Nevada,
23 as follows:

24 **COUNT I**

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

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

1 From about July 1, 2017 through May 1, 2018, in Clark County, Nevada, Defendant
2 EMERALD submitted claims to Medicaid asserting that specific services or quantities of
3 services were provided to the Medicaid recipients and requested reimbursement for
4 provision of services. Defendants knew that such services were not actually provided. The
5 Medicaid recipients did not receive the specific services or quantities of services from
6 EMERALD that Defendant claimed were delivered to the Medicaid recipients.

7 All of which is contrary to form, force and effect of the statutes in such cases made
8 and provided and against the peace and dignity of the State of Nevada. Furthermore,
9 complainant makes this declaration subject to the penalty of perjury.

10 DATED this ___ day of July, 2019.

11 AARON D. FORD
12 Attorney General

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