



1 **INFM**
2 AARON D. FORD
3 Attorney General
4 BEHNAZ F. SALIMIAN (Bar. No. 13752)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 5175 South Durango Drive
9 Las Vegas, NV 89113
10 (702) 486-3420 (phone)
11 (702) 486-0460 (fax)
12 BSalimian@ag.nv.gov
13 *Attorneys for State of Nevada*

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,
11 Plaintiff,
12 vs.
13 DARRYL JOHN ALLEN,
14 I.D. #1091337,
15 Defendant.

Case No. C-20-346716-1
Dept. No. VI

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
18 Attorney General, and BEHNAZ F. SALIMIAN, Senior Deputy Attorney General, informs
19 this Honorable Court that DARRYL JOHN ALLEN, the Defendant above named, has
20 committed the offense of: one (1) count of **SUBMITTING FALSE CLAIMS: MEDICAID**
21 **FRAUD**, a category D felony in violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), in
22 Clark County, State of Nevada.

23 Defendant committed said offenses against the State of Nevada, Department of
24 Health & Human Services, Health Care Financing and Policy Division – Nevada Medicaid
25 (Medicaid) in the following manner:

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1 From on or about January 4, 2016, to May 14, 2017, Divine Healing Health Services
2 L.L.C. (Divine) maintained an agreement with Medicaid to be a provider of services. At all
3 times pertinent to these allegations, Divine maintained a business location at 1810 East
4 Sahara Avenue, Suite 222, Las Vegas, Nevada 89104. Defendant was the sole owner of
5 Divine and had the requisite authority or responsibility pursuant to NRS 422.530.

6 **COUNT I**
7 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
8 **(Category D Felony – NRS 422.540(1)(a) and NRS 422.540(2)(a))**

9 Defendant, pursuant to a scheme or continuing course of conduct and with the intent
10 to defraud, made or caused to be made false claims for payment from Medicaid that
11 Defendant knew were false, to wit:

12 From on or about January 4, 2016, to May 14, 2017, Defendant, through Divine, did
13 knowingly submit and/or cause the submission of false claims to Medicaid for payment
14 asserting that behavioral health services were provided to Medicaid recipients by various
15 service providers. Said service providers denied providing the services on behalf of Divine
16 and denied ever being employed by Divine. Medicaid recipients who purportedly received
17 services from these providers on behalf of Divine denied receiving said services for which
18 Divine billed Medicaid.

19 All of which was committed in Clark County, aggregating an amount greater than
20 \$650, and constitutes a category D felony in violation of NRS 422.540(1)(a) and NRS
21 422.540(2)(a).

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

25 DATED this 10th day of **February** 2020.

26 AARON D. FORD
27 Attorney General

28 By: /s/ Behnaz F. Salimian
BEHNAZ F. SALIMIAN (Bar. No. 13752)
Senior Deputy Attorney General