



1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 11/17/2020, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 **Plaintiff,**

13 **vs.**

14 **APPRIL LYNN BROWN aka**
15 **APRIL LYNN CARNEY aka**
APRIL LYNN SNYDER, I.D. #1078437,

16 **Defendant.**

Case No. C20-352129-2

Dept. No. 28

17 **INFORMATION**

18 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
19 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
20 Honorable Court that APRIL LYNN BROWN aka APRIL LYNN CARNEY aka APRIL
21 LYNN SNYDER ("BROWN"), the Defendant above named, has committed the offense of
22 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a category D felony violation of
23 NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) count, 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, through a scheme or continuous course of conduct, with intent to defraud,
28 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 \$1,200.00:

1 From about April 24, 2017 through May 17, 2018, in Clark County, Nevada,
2 Defendant through Dynamic Minds Family Services LLC (“DMFS”) submitted claims to
3 Medicaid asserting that specific services or quantities of services were provided to the
4 Medicaid recipients by Defendant and requested reimbursement for provision of services.
5 Defendant knew that such services were not actually provided to the Medicaid recipients
6 and that Defendant had not provided these services. The Medicaid recipients did not
7 receive the specific services or quantities of services from DMFS that Defendant claimed
8 were delivered to the Medicaid recipients.

9 Defendant did in fact make false claims to Medicaid, resulting in payment from
10 Medicaid in an amount greater than or equal to \$1,200.00.

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

14 DATED this 12th day of November, 2020.

15 AARON D. FORD
16 Attorney General

17 By: /s/ Steven Sidhu
18 STEVEN SIDHU (Bar. No. 7516)
19 Senior Deputy Attorney General
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