



1 **INFM**
AARON D. FORD
2 Attorney General
Steven Sidhu (Bar. No. 7516)
3 Senior Deputy Attorney General
State of Nevada
4 Office of the Attorney General
5175 South Durango Drive
5 Las Vegas, NV 89113
(702) 486-3420 (phone)
6 (702) 486-0460 (fax)
SSidhu@ag.nv.gov

7
8 Attorneys for State of Nevada
(I.A. 11/19/2020, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 **Plaintiff,**

13 **vs.**

14 **DYNAMIC MINDS FAMILY SERVICES
15 LLC,**

16 **Defendant.**

Case No. C20-352129-1

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 DYNAMIC MINDS FAMILY SERVICES, LLC (“DMFS”), a Nevada
21 limited liability company, 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 submitted claims to Medicaid asserting that specific services or quantities of
3 services were provided to the Medicaid recipients by Defendant and requested
4 reimbursement for provision of services. Defendant knew that such services were not
5 actually provided to the Medicaid recipients and that Defendant had not provided these
6 services. The Medicaid recipients did not receive the specific services or quantities of
7 services from DMFS that Defendant claimed were delivered to the Medicaid recipients.

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

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

13 DATED this 17th day of November, 2020.

14 AARON D. FORD
15 Attorney General

16 By: /s/ Steven Sidhu
17 STEVEN SIDHU (Bar. No. 7516)
18 Senior Deputy Attorney General
19
20
21
22
23
24
25
26
27
28