



1 **INFM**
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14 (I.A. 08/04/2021, 10:00 A.M.)

15 **DISTRICT COURT**

16 **CLARK COUNTY, STATE OF NEVADA**

17 **THE STATE OF NEVADA,**

18 Plaintiff,

19 vs.

20 **PHENOMENAL ANGELS, LLC,**

21 Defendant.

Case No. C21-357741-1

Dept. No. I

22 **INFORMATION**

23 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
24 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
25 Honorable Court PHENOMENAL ANGELS, LLC (“PHENOMENAL”), a Nevada limited
26 liability company, the Defendant above named, has committed the offenses of:
27 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a category D felony violation of
28 NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) count; **OBTAINING AND USING THE**
PERSONAL IDENTIFYING INFORMATION OF ANOTHER PERSON FOR
UNLAWFUL PURPOSES, a category B felony violation of NRS 205.463(1) and NRS
205.463(3), one (1) count; and **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**
RECORDS, a gross misdemeanor violation of NRS 422.570, one (1) count, as follows:

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1 reimbursement for provision of services. Defendant knew that such services were not
2 actually provided.

3 Defendant used the personal identifying information in order to submit false
4 Medicaid claims and obtain payment by these material misrepresentations. Defendant
5 obtained payment through communication of these material misrepresentations in excess
6 of \$3,000.

7 **COUNT III**
8 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
9 **[NRS 422.570(1), Gross Misdemeanor]**

10 Defendant, upon submitting a claim for or upon receiving payment for goods or
11 services pursuant to Medicaid, intentionally failed to maintain such records, for at least 5
12 years after the date on which payment was received, as are necessary to disclose fully the
13 nature of the goods or services for which the claims were submitted or payment received,
14 to wit:

15 Defendant intentionally failed to maintain accurate documentation, including
16 progress notes and service documentation, concerning the services or quantities of services
17 actually provided by its healthcare professionals to the Medicaid recipients. Defendant
18 knew these records were used as a basis for claims submitted for reimbursement from
19 Medicaid. Defendant subsequently obtained payment for such claimed services.

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

23 DATED this 28th day of July, 2021.

24 AARON D. FORD
25 Attorney General

26 By: /s/Steven Sidhu
27 STEVEN SIDHU (Bar. No. 7516)
28 Senior Deputy Attorney General