

INFM
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DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

VS.

DOMINICK TERRELL MUHAMMAD
a/k/a DOMINICK HURD,
ID No. 1022195,

Defendant.

Case No. C-23-373964-1

Dept. No. XXXII

INFORMATION

The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this Honorable Court that DOMINICK TERRELL MUHAMMAD, the Defendant above named, has committed the offense of **SUBMITTING FALSE MEDICAID CLAIMS**, a category D felony violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) count, as follows.

COUNT ONE

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

Defendant, through a scheme or continuous course of conduct, with intent to defraud, 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 \$650:

From on or about January 1, 2018 through December 31, 2019, in Clark County,

1 Nevada, Defendant submitted claims to Medicaid asserting that specific services or
2 quantities of services were provided to the Medicaid recipients by healthcare professionals
3 employed by Doska Project Wellness Center, LLC (“Doska”) and requested reimbursement
4 for provision of services. Defendant knew that such services were not actually provided.
5 The Medicaid recipients did not receive the specific services or quantities of services from
6 Doska that Defendant claimed were delivered to the Medicaid recipients.

7 Defendant did in fact make false claims to Medicaid, resulting in payment from
8 Medicaid in an amount greater than or equal to \$650.

9 All of which was committed in Clark County, aggregating in an amount greater than
10 or equal to \$650.00, and constitutes a category D felony in violation of NRS 422.540.

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 17th day of May, 2023.

15 AARON D. FORD
16 Attorney General

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