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7 IN THE SECOND JUDICIAL DISTRICT COURT
8 IN AND FOR THE COUNTY OF WASHOE, STATE OF NEVADA

9
10 STATE OF NEVADA,

11 Plaintiff,

Case No. CR16-0297B

12 v.

Dept. No. 10

13 MALAYLA, INC. d/b/a NO CHILD LEFT
14 BEHIND BEHAVIORAL HEALTH
SERVICES,

15 Defendants.

16 INFORMATION

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18 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Attorney
19 General, and MARK J. KRUEGER, Senior Deputy Attorney General, in the name and
20 authority of the State of Nevada, informs the court that MALAYLA, INC. d/b/a NO CHILD
21 LEFT BEHIND BEHAVIORAL HEALTH SERVICES, the Defendant, above-named, has
22 committed the criminal offense of **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**, a
23 category D felony in violation of NRS 422.540(1) and 422.540(2)(a) (Count I), within Washoe
24 County, State of Nevada, in the manner following:

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Count I
SUBMITTING FALSE CLAIMS: MEDICAID FRAUD
(“D” Felony – NRS 422.540(1) and 422.540(2)(a))


That the Defendant, MALAYLA, INC. d/b/a NO CHILD LEFT BEHIND BEHAVIORAL HEALTH SERVICES, on or between January 2012 and July 2014, did, with the intent to defraud, commit an offense with respect to the State Plan for Medicaid, by making a claim or caused a claim to be made, knowing the claim to be false, in whole or in part, by commission or omission, and/or by making or causing to be made a statement or representation for use in obtaining or seeking to obtain authorization to provide specific goods or services, knowing the statement or representation to be false, in whole or in part, by commission or omission, all of which occurred in the manner following, to wit: Defendant used information of Medicaid Recipients, including Medicaid recipient identification numbers, while representing they had provided certain Medicaid approved services to Medicaid Recipients which were not provided by Defendant, and/or used information of Medicaid contracted service providers, which providers did not provide the service, in place of employees who were not qualified and/or did not have a Medicaid provider number and/or qualified but not reported as providing the service, and Defendant submitted claims or caused claims to then be submitted to the State Plan for Medicaid for reimbursement, and the amount of the claims or value of the goods or services obtained or sought to be obtained was greater than \$650.00, all of which occurred at or near 895 Roberta Lane, Suite 101, Sparks, Nevada 89431.

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1 All of which is contrary to the form, force and effect of the Statutes in such cases made
2 and provided and against the peace and dignity of the State of Nevada.

3 DATED this 7th day of MARCH, 2016.

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5 ADAM PAUL LAXALT
6 Attorney General

7 By: 
8 MARK J. KRUEGER
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