



1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 07/22/2019, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 **Plaintiff,**

13 **vs.**

14 **JASON ANDRE PEARSON,**

15 **Defendant.**

Case No. C-19-341795-3

Dept. No. V

16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
18 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
19 Honorable Court that JASON ANDRE PEARSON (“PEARSON”), the Defendant above
20 named, has committed the offense of: **SUBMITTING FALSE CLAIMS: MEDICAID**
21 **FRAUD**, a category D felony violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1)
22 count, in Clark County, State of Nevada, as follows:

23 **COUNT I**

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

26 Defendant PEARSON, through a scheme or continuous course of conduct, with
27 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:

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1 From about July 1, 2017 through May 1, 2018, in Clark County, Nevada, Defendant
2 PEARSON through Emerald Vision Services LLC, a Nevada limited liability company
3 (“EMERALD”) submitted claims to Medicaid asserting that specific services or quantities
4 of services were provided to the Medicaid recipients by healthcare professionals employed
5 by EMERALD and requested reimbursement for provision of services. Defendant knew
6 that such services were not actually provided. The Medicaid recipients did not receive the
7 specific services or quantities of services from EMERALD that Defendant claimed were
8 delivered to the Medicaid recipients.

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

12 DATED this ___ day of July, 2019.

13 AARON D. FORD
14 Attorney General

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