



1 **INFM**
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14 (I.A. 02/21/2020, 10:00 A.M.)

15 **DISTRICT COURT**

16 **CLARK COUNTY, STATE OF NEVADA**

17 **THE STATE OF NEVADA,**

18 Plaintiff,

19 vs.

20 **KEON SHAVERS**
21 aka **KEON DONNELL SHAVERS,**

22 Defendant.

23 Case No. C-20-346214-2

24 Dept. No. IX

25 **INFORMATION**

26 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
27 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
28 Honorable Court that KEON SHAVERS aka KEON DONNELL SHAVERS (“SHAVERS”),
the Defendant above named, has committed the offense of **SUBMITTING FALSE
CLAIMS: MEDICAID FRAUD**, a category D felony violation of NRS 422.540(1)(a) and
NRS 422.540(2)(a), one (1) count, as follows:

29 **COUNT I**

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

32 Defendant, through a scheme or continuous course of conduct, with intent to defraud,
33 knowingly and intentionally made false claims or caused false claims to be made for
34 payment from Medicaid, in an aggregate amount greater than or equal to \$650:

1 From about January 1, 2018 through July 5, 2018, in Clark County, Nevada,
2 Defendant through Rays of Life Counseling Services, LLC (“RLCS”) submitted claims to
3 Medicaid asserting that specific services or quantities of services were provided to the
4 Medicaid recipients by RLCS’ providers and requested reimbursement for provision of such
5 services. Defendant knew that such services were not actually provided as the providers
6 had never provided these services to the purported Medicaid recipients. The Medicaid
7 recipients did not receive the specific services or quantities of services from RLCS that
8 Defendant claimed were delivered to the Medicaid recipients.

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

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 ___ day of **February**, 2020.

15 AARON D. FORD
16 Attorney General

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