



1 **AINF**
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8 Attorneys for State of Nevada
(I.A. 05/04/2021, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 Plaintiff,

13 vs.

14 **SENIOR LIFE ADVOCACY GROUP, LLC**
d/b/a F.L.O.R.A.S. PERSONAL CARE
15 **ATTENDANT,**

16 Defendant.

Case No. C21-355481-1

Dept. No. XX

17 **AMENDED INFORMATION**

18 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
19 Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this
20 Honorable Court that SENIOR LIFE ADVOCACY GROUP, LLC d/b/a F.L.O.R.A.S.
21 PERSONAL CARE ATTENDANT (“FLORAS”), a Nevada limited liability company, the
22 Defendant above named, has committed the offense of **INTENTIONAL FAILURE TO**
23 **MAINTAIN ADEQUATE RECORDS**, a gross misdemeanor violation of NRS 422.570,
24 one (1) count, as follows:

25 **COUNT I**
26 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
[NRS 422.570(1), Gross Misdemeanor]

27 Defendant FLORAS, upon submitting a claim for or upon receiving payment for
28 goods or services pursuant to Medicaid, intentionally failed to maintain such records, for

1 at least 5 years after the date on which payment was received, as are necessary to disclose
2 fully the nature of the goods or services for which the claims were submitted or payment
3 received, to wit:

4 From on or about January 2018 through January 2019, Defendant FLORAS
5 intentionally failed to maintain accurate documentation, including progress notes and
6 service documentation, concerning the services or quantities of services actually provided
7 by its healthcare professionals to the Medicaid recipients. Defendant knew these records
8 were used as a basis for claims submitted for reimbursement from Medicaid. Defendant
9 subsequently obtained payment for such claimed services.

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

13 DATED this 28th day of April, 2021.

14 AARON D. FORD
15 Attorney General

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