



1 **INFM**  
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8 Attorneys for State of Nevada  
(I.A. 11/30/2020, 10:00 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

12 Plaintiff,

13 vs.

14 **KRYSTLE PRITCHETT aka**  
**KRYSTLE DELEON, I.D. #2566408**

15 Defendant.

Case No. C20-352326-2

Dept. No. III

16  
17 **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 KRYSTLE PRITCHETT aka KRYSTLE DELEON, the Defendant  
21 above named, has committed the offense of **SUBMITTING FALSE CLAIMS: MEDICAID**  
22 **FRAUD**, a category D felony violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1)  
23 count, as follows:

24 **COUNT I**

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

26 Defendant, through a scheme or continuous course of conduct, with intent to defraud,  
27 knowingly and intentionally made false claims or caused false claims to be made for  
28 payment from Medicaid, in an aggregate amount greater than or equal to \$1,200.00:

1 From about August 17, 2015 through August 13, 2018, in Clark County, Nevada,  
2 Defendant, through JAK Counseling Services, Inc. (“JAK”), Better Life Counseling Services  
3 (“Better Life”) and A3 Konsulting (“A3”), submitted claims to Medicaid asserting that  
4 specific services or quantities of services were provided to the Medicaid recipients by  
5 healthcare professionals purportedly employed by JAK, Better Life and A3 and requested  
6 reimbursement for provision of services. Defendant knew that such services were not  
7 actually provided. The Medicaid recipients did not receive the specific services or  
8 quantities of services from JAK, Better Life and A3 that Defendant claimed were delivered  
9 to the Medicaid recipients.

10 Defendant did in fact make false claims to Medicaid, resulting in payment from  
11 Medicaid in an amount greater than or equal to \$1,200.00.

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

15 DATED this 24th day of November, 2020.

16 AARON D. FORD  
17 Attorney General

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