



INFM
AARON D. FORD
Attorney General
Steven Sidhu (Bar. No. 7516)
Senior Deputy Attorney General
State of Nevada
Office of the Attorney General
5175 South Durango Drive
Las Vegas, NV 89113
(702) 486-3420 (phone)
(702) 486-0460 (fax)
SSidhu@ag.nv.gov
Attorneys for State of Nevada
(I.A. 09/25/2024, 9:00 A.M.)

DISTRICT COURT

CLARK COUNTY, STATE OF NEVADA

THE STATE OF NEVADA,

Plaintiff,

vs.

THE HEALING TREE WELLNESS
CENTER, LLC,

Defendant.

Case No. C-24-385975-2

Dept. No. XVII

INFORMATION

The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this Honorable Court THE HEALING TREE WELLNESS CENTER, LLC ("HEALING TREE"), a Nevada limited liability company, 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, [**NOC 56141**] as follows:

COUNT I

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

Defendant HEALING TREE, through a scheme or continuous course of conduct, with 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:

From on or about November 1, 2018, through on or about October 1, 2020, in Clark

1 County, Nevada, Defendant HEALING TREE submitted claims to Medicaid asserting that
2 specific services or quantities of services were provided to the Medicaid recipients by
3 HEALING TREE's service provider Alice Smith, which the service provider denied
4 providing. Defendant knew that such services were not actually provided, yet Defendant
5 requested reimbursement from Medicaid for provision of said services and subsequently
6 received payment.

7 Defendant HEALING TREE did in fact make false claims to Medicaid, resulting in
8 payment from Medicaid in an amount greater than or equal to \$650.

9 All of which was committed in Clark County, aggregating in an amount greater than
10 or equal to \$650, and constitutes a category D felony in violation of NRS 422.540(1)(a) and
11 NRS 422.540(2)(a).

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 18th day of September, 2024.

16 AARON D. FORD
17 Attorney General

18 By: /s/Steven Sidhu
19 STEVEN SIDHU (Bar. No. 7516)
20 Senior Deputy Attorney General
21
22
23
24
25
26
27
28