



INFM
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(I.A. 09/25/2024, 9:00 A.M.)

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

vs.

Case No. C-24-385975-1
Dept. No. XVII

MARJORIE VIELKA LANDRON,

Defendant.

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 that MARJORIE VIELKA LANDRON ("LANDRON", the Defendant above named, has committed the offense of **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**, a Gross Misdemeanor violation of NRS 422.570(1), one (1) count, [NOC 51568] as follows:

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

Defendant LANDRON, through the operation of The Healing Tree Wellness Center, LLC ("Healing Tree"), upon submitting a claim for or upon receiving payment for goods or services pursuant to the State Plan for Medicaid (Plan), intentionally failed to maintain such records, for at least 5 years after the date on which payment was received, as are

1 necessary to disclose fully the nature of the goods or services for which the claims were
2 submitted or payment received, to wit:

3 Defendant LANDRON intentionally failed to maintain accurate documentation,
4 including progress notes and service documentation, concerning the services or quantities
5 of services actually provided by Healing Tree's healthcare professionals to Medicaid
6 recipients. Defendant knew these records were used as a basis for claims submitted for
7 reimbursement from Medicaid from on or about November 1, 2018, through on or about
8 October 1, 2020. Defendant subsequently obtained payment for such claimed services.

9 All of which was committed in Clark County and constitutes a gross misdemeanor
10 violation of NRS 422.570(1).

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 18th day of September, 2024.

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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